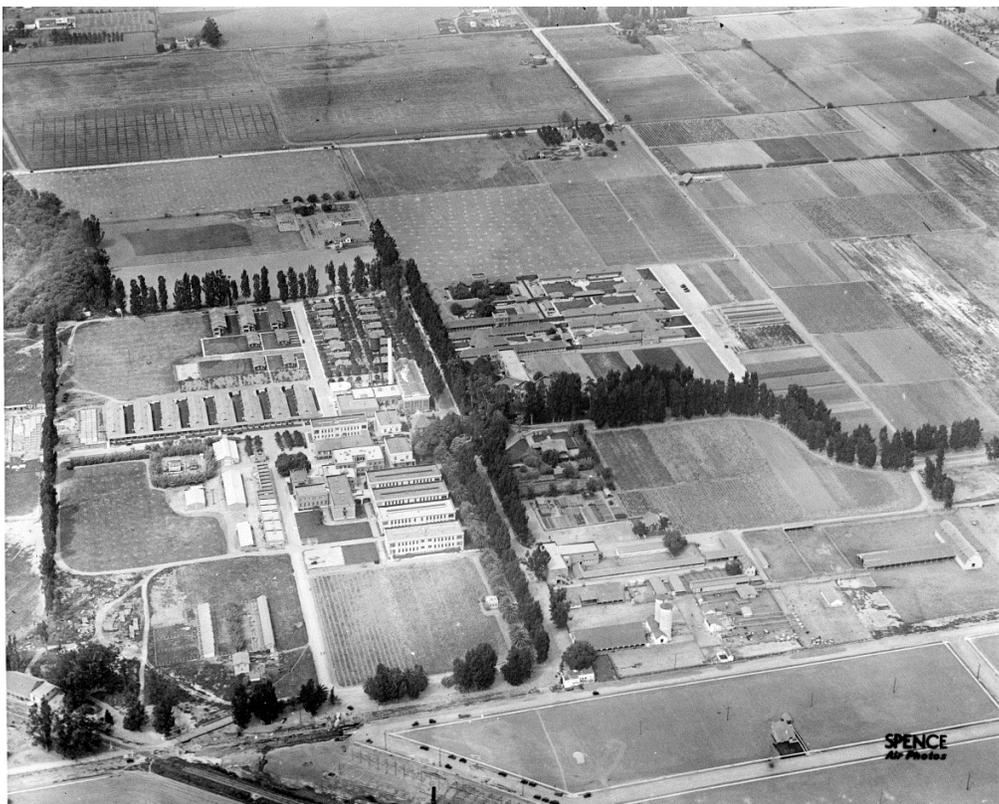


RANCHO LOS AMIGOS SOUTH CAMPUS PROJECT

Final Environmental Impact Report
State Clearinghouse No. 2017081017

Prepared for
County of Los Angeles
Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803

June 2020



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TABLE OF CONTENTS

Rancho Los Amigos South Campus Project Final Environmental Impact Report

	<u>Page</u>
Chapter 1, Introduction	1-1
1.1 Purpose of the Final EIR	1-1
1.2 Project Summary.....	1-1
1.3 Summary of Alternative 4, Scenario 2	1-2
1.4 Overview of the CEQA Public Review Process for the Draft EIR	1-5
1.5 Organization of the Final EIR.....	1-7
Chapter 2, Comments and Responses.....	2-1
Letter A1	2-6
Letter A2.....	2-9
Letter A3.....	2-17
Letter B1.....	2-18
Letter B2.....	2-20
Letter B3.....	2-22
Letter B4.....	2-25
Letter B5.....	2-29
Letter C1.....	2-101
Letter C2.....	2-107
Letter C3.....	2-113
Letter C4.....	2-130
Letter C5.....	2-134
Letter C6.....	2-148
Letter D1.....	2-152
Letter D2.....	2-154
Letter D3.....	2-156
Letter D4.....	2-158
Letter D5.....	2-159
Letter D6.....	2-161
Letter D7.....	2-164
Letter D8.....	2-166
Letter D9.....	2-168
Letter D10	2-170
Letter D11	2-172
Letter D12	2-174
Letter D13	2-176
Letter D14	2-178
Letter D15	2-180
Letter D16	2-183
Letter D17	2-185

	<u>Page</u>
Letter D18	2-187
Letter D19	2-189
Letter D20	2-190
Letter D21	2-191
Letter D22	2-192
Letter D23	2-196
Letter D24	2-200
Letter D25	2-201
Letter D26	2-203
Letter D27	2-206
Letter D28	2-207
Letter D29	2-210
Letter D30	2-213
Letter D31	2-214
Letter D32	2-215
Letter D33	2-216
Letter D34	2-218
Letter D35	2-220
Letter D36	2-224
Letter D37	2-228
Letter D38	2-229
Letter D39	2-230
Letter D40	2-233
Letter D41	2-239
Chapter 3, Revisions, Clarifications, and Corrections to the Draft EIR.....	3-1
Chapter 1, Introduction	3-2
Chapter 2, Project Description	3-3
Chapter 3, Environmental Analysis.....	3-5
Chapter 4, Alternatives	3-17
Chapter 4, Alternative 4 Scenario 2	4-1
4.6 Summary of Project Alternatives	4-1
4.8 Alternatives to the Proposed Project	4-4
Chapter 5, References.....	5-1

Appendices

H-2	Revised Traffic Impact Study
H-3	Supplemental Traffic Analysis
K-1	Character Defining Features Memorandum
L	2020 Feasibility Study
M	Comments on the Draft EIR
N	Additional Cost Information

Page**List of Figures**

2-1	Access To and From the Project Site via Consuelo Street.....	2-71
4-4	Adaptive Reuse/Reduced Project Alternative Scenario 1	4-7
4-5	Adaptive Reuse/Reduced Project Alternative Scenario 2	4-10

List of Tables

2-1	Summary of Comments on the Rancho Los Amigos South Campus Project Draft EIR.....	2-2
C3-1	Comparison of Proposed Project and Alternative 4 Scenario 2 (District Contributors)	2-121
C3-2	Summary of Costs.....	2-125
4-1	Comparison of Features for the Project Alternatives	4-4
4-4	Buildings to be Adaptively Reused and Retained under Alternative 4 Scenario 1	4-6
4-5	Adaptive Reuse/Reduced Alternative - Affected Los Angeles County Departments	4-8
4-6	Buildings to be Adaptively Reused and Mothballed under Alternative 4 Scenario 2	4-9
4-7	Maximum Unmitigated Regional Operational Emissions (pounds per day) for Scenario 1	4-14
4-8	Maximum Mitigated Regional Operational Emissions (pounds per day) for Scenario 1	4-14
4-9	Estimate of Alternative 4 Scenario 2's Average Future Water Demand	4-35
4-10	Estimated Operational Solid Waste Generation under Alternative 4 Scenario 2	4-36
4-11	Comparison of Impacts Associated with the Alternatives and the Project	4-40

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CHAPTER 1

Introduction

1.1 Purpose of the Final EIR

The County of Los Angeles (County), as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared this Final Environmental Impact Report (Final EIR) for the proposed Rancho Los Amigos South Campus Project (or Project). This document, in conjunction with the Draft Environmental Impact Report (Draft EIR), comprises the Final EIR.

As described in CEQA Guidelines Sections 15088, 15089, 15090 and 15132, the Lead Agency must evaluate comments received on the Draft EIR and prepare written responses and consider the information contained in a Final EIR before approving a project. Pursuant to CEQA Guidelines Section 15132, a Final EIR consists of: a) the Draft EIR or a revision of the Draft; b) comments and recommendations received on the Draft EIR either verbatim or in summary; c) a list of persons, organizations, and public agencies commenting on the Draft EIR; d) the responses of the Lead Agency to significant environmental points raised in the review and consultation process; and e) any other information added by the Lead Agency.

1.2 Project Summary

The proposed Project would develop three new County administrative buildings within the 35-acre Development Area on the 74-acre Project Site, including the Internal Services Department (ISD) Headquarters, Probation Headquarters, and the County Office Building, totaling up to approximately 650,000 square feet. The proposed Project would include parking as well as all necessary utilities and points of connection, roadways, curbs and gutters, sidewalks, medians, site structures, hydrants, vaults, manholes, substations, street lights, street signage, landscaping, and irrigation for the Project Site. The proposed Project would also include roadway widening and other street improvements. Demolition of existing buildings, hardscape, and some landscape features throughout the Development Area and larger Project Site would occur.

The ISD Headquarters building to be developed on the Project Site would be up to approximately 315,000 square feet in size. The ISD Headquarters building would have a maximum height of approximately 90 feet or six stories above finished grade. The Project would have the option of combining the Probation Department Headquarters (Probation Headquarters) building and ISD Headquarters building, which would increase the overall building square footage by approximately 168,000 square feet (thus resulting in a total 483,000 square foot building). The proposed Probation Headquarters building would be up to approximately 168,000 square feet in

size with a maximum height of approximately 90 feet or six stories above finished grade. The Probation Headquarters would contain, offices and workstations, meeting spaces, support space, specialty spaces (such as labs, computer repair rooms, and data centers), interior circulation, restrooms, common gathering areas. The County Office Building would house general County office uses. The proposed County Office Building would be up to approximately 167,000 square feet in size. The County Office Building would have a maximum height of approximately 75 feet or five stories above finished grade.

Demolition of existing buildings and structures would occur throughout the Project Site. 105 buildings and landscape features would be demolished. The buildings, structures, and features proposed to be retained on the Project Site include three of the five individually eligible historic buildings, structures, and features (which are all also contributors to the Historic District): LACO Nos. 1100, 1238, 1301, plus the Moreton Bay Fig Tree. Following demolition of the buildings and structures on the remainder of the Project Site, the Site would be graded with irrigation installed, and hydroseeded with a native seed mix, and would remain open until such time future development may be proposed, if it is approved.

Prior USTs on the Project Site have led to subsurface soil and groundwater contamination, and there is currently an open case with the Los Angeles Regional Water Quality Control Board (LARWQCB) which is the regulatory agency responsible for ensuring clean up to state standards. A work plan is currently in development for approval by the LARWQCB to address the cleanup below LACO No. 1276, which would be implemented as part of the proposed Project. Remedial excavation would occur on the Project Site, immediately south of the Development Area, following the demolition of LACO No. 1276. The remedial activities would remove hydrocarbon-bearing soil present at depths ranging from approximately 20 to 45 feet below ground surface (bgs). Soil from the upper 25 feet of soil would be excavated and stockpiled. Then soil from 25 to 45 feet bgs or the depth of groundwater, which contains the highest concentrations of petroleum hydrocarbons identified in the previous site assessments, would be excavated. Contaminated soil from approximately 25 to 45 feet bgs (approximately 5,333 cubic yards of material) would be hauled off-site to an approved and licensed facility. Pending results of laboratory analysis, soil stockpiled from the upper 25 feet bgs would be augmented with clean import soil and used to backfill the resulting excavation. The upper 20 feet of the excavation would be recompact.

1.3 Summary of Alternative 4, Scenario 2

As further detailed in Chapter 4, *Alternative 4 Scenario 2*, of this Final EIR, based on comments received on the Draft EIR during the environmental review process, particularly concerns regarding historical resources, as well as additional efforts undertaken by the County to develop up-to-date information about the feasibility of rehabilitating and reusing existing buildings and structures on the Project Site, the County developed a new Scenario 2 to Alternative 4: Adaptive Reuse/Reduced Project Alternative.

In Scenario 2, a portion of the proposed County uses would be relocated into selected existing Individually Eligible buildings within the District which would be adaptively reused, in addition

to the new construction proposed under the Project. Two individually eligible buildings would be adaptively reused to include various components of the proposed County uses: (1) LACO No. 1238 (Casa Consuelo) and (2) LACO No. 1300 (Power Plant). LACO No. 1100 (Administration Building) would, similar to existing conditions, be retained and occupied by the Los Angeles County Sheriff's Department (LASD) Professional Standards Division. LACO No. 1301 (Water Tower), an individually eligible structure, would be restored, repainted, and seismically upgraded. While the Water Tower would not be operational upon restoration, the Water Tower would remain on the Project Site and continue to serve as a focal point for the South Campus. LACO No. 1302 (Shop & Laundry), an individually eligible primary contributor, would be mothballed for future County use (no funding or uses are identified at this time; the scenario only includes retaining and mothballing the structure).

In addition to the buildings to be retained, adaptively reused where indicated, and mothballed, this scenario would also include new construction in the Development Area as proposed under the Project. Similar to the Project, this scenario would construct up to 650,000 square feet of floor area for the ISD Headquarters, Probation Department Headquarters, and County Office Building. This scenario would also develop the ISD/Probation Parking Structure and County Office Parking Structure, as well as all necessary infrastructure improvements. As stated within Chapter 2, *Project Description*, of the Draft EIR, the new construction on the Project Site would utilize the design-build process, and due to this evolving process, it was determined that the ancillary and support spaces within the ISD and Probation Department Headquarters buildings would be increased to offer more collaborative spaces for the County employees. Therefore, employees under this scenario would be moved to the adaptively reused buildings.

The proposed County uses (ISD Headquarters, Probation Department Headquarters, and County Office Building) would have the same design elements and operational characteristics as described in Chapter 2, *Project Description*. The adaptively reused buildings, in combination with the proposed County uses, would similarly house 3,000 County employees as analyzed under the Project. Therefore, operational characteristics are anticipated to be similar under this scenario as with the Project as analyzed in the Draft EIR. Although additional construction efforts would be needed to rehabilitate the buildings, less demolition would occur and overall, construction phases would be similar. It is assumed for this scenario that the maximum daily construction workers and equipment that would be utilized by phase during construction would be the same as analyzed for the proposed Project. Remedial activities related to the contaminated groundwater plume would occur on the Project Site in the same manner as the Project, following the demolition of LACO No. 1276 (a Secondary Contributor).

A summary and analysis of Alternative 4, Scenario 2, has been included in Chapter 4, *Alternative 4 Scenario 2*, of the Final EIR. Additionally, the Final EIR includes the complete feasibility study (Harlan et al., 2020) prepared to provide the County with up-to-date information on the various resources in the Historic District with regard to cost, architectural considerations, structural considerations, and ability/inability to meet Project Objectives as Appendix L.

The introduction of this scenario does not give rise to recirculation of the Draft EIR because it does not provide significant new information that would give rise to a new significant

environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it. Under *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1993) 6 Cal.4th 112 (*Laurel Heights II*) and CEQA Guidelines Section 15088(a)(3), when information added to a Final EIR consists of a suggested new project alternative or mitigation measure, recirculation is required only if the new alternative or mitigation measure meets all of the following criteria (*South County Citizens for Smart Growth v. County of Nevada* (2013) 22 Cal. 4th 316, 330):

- It is considerably different from the alternatives already evaluated in the Draft EIR;
- It would clearly lessen the project's significant environmental impacts;
- It is feasible; and
- It is not adopted.

While Alternative 4 Scenario 2 results in the retention and/or adaptive reuse of fewer contributing structures than the other alternatives evaluated in the EIR, it is not considerably different from those alternatives in that it evaluates a scenario for demolition and adaptive reuse that would reduce significant impacts compared to the Project evaluated in the Draft EIR. The Project evaluates the demolition of 105 (of 109) building and structures, 57 of which are contributors to the District. The No Project Alternative assumes that no new development or demolition would occur within the Project Site. Alternatives 2 through 4, evaluate varying levels of retention, adaptive reuse, mothballing, and demolition of buildings and structures. Alternative 4 Scenario 2 falls within the range alternatives evaluated in the Draft EIR; therefore, it does not present new information warranting recirculation.

CEQA case law emphasizes that “[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal.” (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 736-737; see also *River Valley Preservation Project v. Metropolitan Transit Development Bd.* (1995) 37 Cal.App.4th 154, 168, fn. 11.) “CEQA compels an interactive process of assessment of environmental impacts and responsive project modification which must be genuine. It must be open to the public, premised upon a full and meaningful disclosure of the scope, purposes, and effect of a consistently described project, with flexibility to respond to unforeseen insights that emerge from the process. In short, a project must be open for public discussion and subject to agency modification during the CEQA process.” (*Concerned Citizens of Costa Mesa, Inc. v. 33rd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 936 (internal citations omitted).) Here, the changes made to the Draft EIR in the Final EIR and the identification of Alternative 4 Scenario 2 are exactly the kind of revisions that the case law recognizes as legitimate and proper.

The County Board of Supervisors will consider Alternative 4 Scenario 2, along with the other Alternatives analyzed in Chapter 4 of the Final EIR before making its final decision on the Project.

1.4 Overview of the CEQA Public Review Process for the Draft EIR

In compliance with the CEQA Guidelines, the County, as the Lead Agency for the Project, has provided opportunities for the public to participate in the environmental review process. As described below, throughout the environmental review process, an effort was made to inform, contact and solicit input from the public and various Federal, State, regional, and local government agencies and other interested parties on the Project.

Notice of Preparation

At the onset of the environmental review process and pursuant to the provisions of Section 15082 of the State CEQA Guidelines, the County of Los Angeles circulated a Notice of Preparation (NOP) to State, regional, and local agencies, and members of the public for a 30-day scoping period, commencing August 9, 2017 and ending September 11, 2017. Early input was sought from other County departments prior to public circulation of the NOP. The purpose of the NOP was to formally convey that the County was preparing a Draft EIR for the proposed Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. The NOP included notification that public scoping meetings would be held in an open house format to inform public agencies and other interested parties of the Project and to solicit input regarding the Draft EIR. The meeting was held on August 30, 2017 between 5:30 P.M. and 7:30 P.M. at the Barbara J. Riley Community and Senior Center. The meeting provided interested individuals, groups, and public agencies the opportunity to provide oral and written comments to the Lead Agency regarding the scope and focus of the Draft EIR, as described in the NOP. The NOP, public comments on the NOP, and Scoping Meeting materials are provided in Appendix A, NOP and Scoping Meeting, of the Draft EIR.

Draft Environmental Impact Report

In accordance with CEQA Guidelines Section 15085, upon completion of the Draft EIR and publication on October 9, 2019, a Notice of Availability (NOA) as well as CD copies of the Draft EIR were submitted to the State Clearinghouse, Governor's Office of Planning and Research, for distribution to State Agencies. The Draft EIR was circulated for a 45-day public review period between October 9, 2019 and November, 22, 2019, in compliance with CEQA Guidelines Section 15105(a). As required under CEQA Guidelines Section 15086, a NOA requesting comments on the Draft EIR and CDs of the Draft EIR were distributed to public agencies, organizations, and interested parties. In addition, copies of the NOA, in both English and Spanish, were mailed to organizations or individuals who had previously requested notice or expressed an interest in the Project, commented on the Project during the public review period, or attended the public scoping meeting conducted for preparation of the Draft EIR. Furthermore, copies of the NOA were mailed to property owners and occupants within a half-mile radius of the Project Site. A newspaper advertisement of the NOA and Draft EIR comment period and information regarding the public meeting was also placed in the Los Angeles Times.

Hard copies of the Draft EIR were placed at the following locations:

- Los Angeles County, Chief Executive Office
754 Kenneth Hahn Hall of Administration
500 W. Temple Street, Room 754
Los Angeles, CA 90012
- Rancho Los Amigos North Campus Public Works Site Office
7402 Leeds Street, Trailer E
Downey, CA 90242
- Downey City Hall
11111 Brookshire Avenue
Downey, CA 90241
- Hollydale Library
1200 South Garfield Avenue
South Gate, CA 90280
- Lynwood Library
11320 Bullis Road
Lynwood, CA 90262
- Leland R. Weaver Library
4035 Tweedy Boulevard
South Gate, CA 90280

During the Draft EIR public review period, the County of Los Angeles received 55 comment letters on the Draft EIR from agencies, organizations, and individuals through written correspondence and emails. A public meeting was held on October 28, 2019 from 6:00 P.M. to 8:30 P.M. at the Barbara J. Riley Community and Senior Center Auditorium to present Project information, provide a summary of the Draft EIR's analysis and findings regarding the Project, give an overview of the CEQA public review process, and provide instructions on how to submit written comments on the Draft EIR. All written comments received during the public review period are presented, and responses are provided in Chapter 2, *Responses to Comments*, of this Final EIR.

Final Environmental Impact Report

Following the close of the Draft EIR public review and comment period, the County of Los Angeles prepared a Final EIR, which includes responses to comments received on the Draft EIR. The comments provided do not provide an indication that the Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded (refer to CEQA Guidelines Section 15088.5(a)(4)).

Consistent with CEQA Guidelines Section 21092.5, responses to agency comments will be provided to each commenting agency at least 10 days prior to the Board of Supervisor's consideration of the EIR. The Draft EIR and this Final EIR will also be publicly available online

at least 10 days prior to the Board's consideration of the EIR at:
<ftp://dpwftp.co.la.ca.us/pub/pmd/Rancho%20Los%20Amigos%20South%20Campus%20EIR/>.

1.5 Organization of the Final EIR

The Final EIR consists of the following four chapters:

Chapter 1, Introduction. This chapter describes the purpose of the Final EIR, provides a summary of the proposed Project, summarizes the Final EIR public review process, and presents the contents of this Final EIR.

Chapter 2, Responses to Comments. This chapter presents all comments received by the County during the 45-day public review period of the Draft EIR (October 9, 2019 and November, 22, 2019) as well as the responses to those comments. A total of 55 comment letters were received. Two comment letters (one from the State Clearinghouse and one from an individual) received after the close of the public review period are also included.

Chapter 3, Revisions, Clarifications and Corrections on the Draft EIR. This chapter includes revisions to the Draft EIR that represent minor changes, clarifications, or additions in response to some of the comments received on the Draft EIR and additional edits to provide clarification. Changes to the Draft EIR are shown with ~~striketrough~~ text for deletions and double underline text for additions. These changes are minor and do not add significant new information that would affect the analysis or conclusions presented in the Draft EIR.

Chapter 4, Alternative 4 Scenario 2. This chapter provides a summary and environmental analysis for Scenario 2 to Alternative 4: Adaptive Reuse/Reduced Project Alternative. This chapter shows changes that have been made to a portion of Chapter 4, *Alternatives*, of the Draft EIR in ~~striketrough~~ text for deletions and double underline text for additions that have been made regarding this scenario.

Chapter 5, References. This chapter sets forth a comprehensive listing of all sources of information used in the preparation of this Final EIR.

Appendices to the Final EIR. The following list sets forth the appendices as referenced throughout the Final EIR.

- Appendix H-2: Revised Traffic Impact Study
- Appendix H-3: Supplemental Traffic Analysis
- Appendix K-1: Character Defining Features Memorandum
- Appendix L: 2020 Feasibility Study
- Appendix M: Comments on the Draft EIR
- Appendix N: Additional Cost Information

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CHAPTER 2

Comments and Responses

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

The letters received during the public comment period are provided within this section and are summarized below in Table 2-1. A total of 55 comment letters were received. As indicated in Table 2-1, the individual letters are organized by State agencies (Group A), local agencies (Group B), organizations (Group C), and then interested parties (Group D). Each comment that requires a response is also assigned a number within their own group. For example, the first State Agency comment letter from the California Department of Toxic Substances Control (DTSC) is labeled Letter No. A1. Accordingly, the first comment from the letter is labeled “Comment No. A1-1” and the corresponding response provided is labeled “Response No. A1-1”. Where responses result in a change to the Draft EIR, it is noted, and the resulting change is identified in Chapter 3, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR.

As required by the CEQA Guidelines Section 15088 (c), the focus of the responses to comments is on “the disposition of significant environmental issues raised.”

**TABLE 2-1
SUMMARY OF COMMENTS ON THE RANCHO LOS AMIGOS SOUTH CAMPUS PROJECT DRAFT EIR**

Comment Letter Number	Date Received	Name	Association	Comment Format	Environmental Category						
					Aesthetics	Air Quality/ GHG	Cultural Resources	Noise	Traffic	Alternatives	Other
State Agencies											
A1	October 29, 2019	Fatima Carrera	California Department of Toxic Substances Control (DTSC)	Letter							X
A2	November 21, 2019	Miya Edmonson	California Department of Transportation (Caltrans)	Letter					X		
A3 ^a	December 4, 2019	Scott Morgan, Director	State of California Governor's Office of Planning and Research	Letter							X
Local Agencies											
B1	November 5, 2019	Michael Y. Takeshita	County of Los Angeles Fire Department	Letter							X
B2	November 21, 2019	Alex Villanueva, Sheriff Tracy Jue, Director Britta S. Steinbrenner, Captain	County of Los Angeles Office of the Sheriff, Facilities Planning Bureau and County Services Bureau	Email							X
B3	November 22, 2019	Adriana Raza, Customer Service Specialist	Sanitation Districts of Los Angeles County, Facilities Planning Department	Email							X
B4	November 22, 2019	John Carver, Planning Director	City of Paramount, Planning Department	Email received on November 22. Letter is dated November 21, 2019.		X			X		
B5	November 22, 2019	Joe Perez, Community Development Director	City of South Gate, Community Development Department	Email received on November 22. Letter is dated November 21, 2019.	X	X	X	X	X	X	X

Comment Letter Number	Date Received	Name	Association	Comment Format	Environmental Category						
					Aesthetics	Air Quality/ GHG	Cultural Resources	Noise	Traffic	Alternatives	Other
Organizations											
C1	November 18, 2019	Cheryl Perry, President Louise Ivers, Vice President for Advocacy Sarah Locke, Executive Director	Long Beach Heritage	Email						X	
C2	November 18, 2019	Susan N. Mossman, Executive Director Andrew Salimian, Preservation Director	Pasadena Heritage	Letter		X	X		X	X	
C3	November 21, 2019	Adrian Scott Fine, Director of Advocacy	Los Angeles Conservancy	Email			X			X	X
C4	November 21, 2019	Michael Morgan, President	Historical Society of the Crescenta Valley	Email						X	
C5	November 21, 2019	Amy Minter	Chatten-Brown, Carstens & Minter LLP (on behalf of the LA Conservancy)	Letter			X			X	X
C6	November 21, 2019	Victor Omelczenko, Board President	West Hollywood Preservation Alliance	Email							X
Interested Parties											
D1	October 15, 2019	James Fountain		Email	X				X		
D2	October 22, 2019	Nancy Webber		Email			X				
D3	October 22, 2019	Carlos Cordoba		Email			X				
D4	October 22, 2019	Chris Nichols		Email							X
D5	October 22, 2019	Chris Nichols		Email			X			X	
D6	October 22, 2019	Denise and Steve Smith		Email			X				
D7	October 22, 2019	Dennis Hill		Email			X				

Comment Letter Number	Date Received	Name	Association	Comment Format	Environmental Category						
					Aesthetics	Air Quality/ GHG	Cultural Resources	Noise	Traffic	Alternatives	Other
D8	October 22, 2019	Marilyn Welch		Email			X				
D9	October 22, 2019	Valerie Ho		Email			X				
D10	October 23, 2019	Eric Stokien		Email			X				
D11	October 23, 2019	Jacklyn Loughbom		Email			X				
D12	October 24, 2019	Leora Glass		Email			X				
D13	October 25, 2019	Heather Sabin		Email			X				
D14	October 28, 2019	Alicia Flores-Rivera		Written Comment Form					X		
D15	October 28, 2019	Andrea Paulino		Written Comment Form		X			X		
D16	October 28, 2019	Briseida Ramirez		Written Comment Form		X		X	X		X
D17	October 28, 2019	Cecilia Tellez		Written Comment Form		X		X	X		
D18	October 28, 2019	David A. Smith		Written Comment Form					X		
D19	October 28, 2019	Jean O. Douglass		Written Comment Form			X				
D20	October 28, 2019	Linda Parsonson		Written Comment Form			X				X
D21	October 28, 2019	Linda Parsonson		Written Comment Form					X		
D22	October 28, 2019	Renee Acero		Written Comment Form			X		X		X
D23	October 28, 2019	Vincinia Johnson		Written Comment Form					X		
D24	October 30, 2019	Gary Hill		Email							X
D25	October 30, 2019	Gary Hill		Email					X		
D26	October 31, 2019	Michael Hayes		Email			X				
D27	November 1, 2019	Donna Siemann		Email							X

Comment Letter Number	Date Received	Name	Association	Comment Format	Environmental Category						
					Aesthetics	Air Quality/ GHG	Cultural Resources	Noise	Traffic	Alternatives	Other
D28	November 1, 2019	Janet Adams		Email			X		X		
D29	November 5, 2019	Alexander B. Yotsov		Letter/ Email		X		X	X		
D30	November 6, 2019	Gary Hill		Written Comment Form Received on 11-6-19							X
D31	November 6, 2019	Jack Russell		Written Comment Form Received on 11-6-19							X
D32	November 6, 2019	Lynda Mahaffey		Written Comment Form Received on 11-6-19							X
D33	November 7, 2019	Walter Sebring		Email			X				X
D34	November 13, 2019	Erica Connelly		Email			X			X	
D35	November 13, 2019	Francesca Anne		Email			X				X
D36	November 19, 2019	Renee Acero		Email	X				X		X
D37	November 19, 2019	Renee Acero		Email	X						
D38	November 21, 2019	Mario Acero		Email	X				X		X
D39	November 21, 2019	Wendy Gish		Email			X				
D40	November 22, 2019	Sandra Perez		Email					X		X
D41 ^a	November 25, 2019	Ron & Jennifer Boren		Written Comment Form Received on 11-25-19	X				X		X

^a Comment was received by the Lead Agency after the close of the public comment period.

SOURCE: ESA, 2020

Letter A1

California Department of Toxic Substances Control (DTSC)
Fatima Carrera
Site Mitigation and Restoration Program – Chatsworth Office
9211 Oakdale Avenue
Chatsworth, California 91311
Letter dated October 16, 2019
Received on October 29, 2019

Response No. A1-1

The County thanks the California Department of Substances Control (DTSC) for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project. In addition, pursuant to CEQA Guidelines Section 15088(b), the County of Los Angeles will provide any public agency that commented on the Draft EIR with a response to the agency's comments (either as a printed copy or in an electronic format) at least 10 days before considering certification of the Final EIR.

This comment acknowledges that the DTSC has received the Notice of Availability for the Project. The remainder of the comment is addressed below in Responses to Comment Nos. A1-2 through A1-5.

Response No. A1-2

This comment states that the Draft EIR should identify whether current or historic uses at the Project Site have resulted in any release of hazardous wastes/substances at the Project area. It should be clarified that the Draft EIR defines the Project Site as the South Campus, and the Development Area as the 35-acre portion on which the new County facilities will be constructed. Even though the comment inquires about the Project area, for the purposes of this comment, it is interpreted to mean the Project Site, not the Development Area. Therefore, the responses to comments will address the broader area as defined by the Project Site and not the Development Area. The comment also requests that the Draft EIR identify any known or potentially contaminated site within the Project Site and whether conditions at the Project Site pose a threat to human health or the environment. The comment does not provide any specific suggestion that the information contained in the Draft EIR is insufficient.

Pages 3.7-2 through 3.7-12 of Section 3.7, *Hazards and Hazardous Materials*, provide details of the existing conditions on the Project Site. As stated in the aforementioned pages, various hazardous materials surveys identify the locations and concentrations of hazardous building materials throughout the Project Site. As stated on pages 3.7-6 through 3.7-12, the County has conducted investigations and cleanup activities to remove known underground storage tanks (USTs), and has analyzed soil and groundwater for various chemicals throughout the Project Site

based on the previous uses. This information was used to form the basis of the impact evaluation related to hazards.

As stated under Impact HAZ-1 on pages 3.7-22 through 3.7-24, the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. As stated under Impact HAZ-2 on pages 3.7-24 through 3.7-25, the proposed Project would not 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. The Project would comply with various regulations that require that demolition and renovation activities that may disturb or require the removal of materials that consist of, or contain hazardous materials, must be inspected and/or tested for the presence of hazardous materials. If present, the hazardous materials must be managed and disposed of in accordance with applicable laws and regulations. Therefore, the information contained within the Draft EIR is sufficient to address this comment, and no revisions are necessary.

Response No. A1-3

This comment states that the Draft EIR should identify mechanisms to initiate required investigation and/or remediation for the Project Site and which government agency will provide appropriate regulatory oversight. As stated on page 3.7-7 of Section 3.7, *Hazards and Hazardous Materials*, the Los Angeles Regional Water Quality Control Board (LARWQCB) is the agency providing regulatory oversight for the investigation and cleanup activities by using Regional Screening Levels (RSLs) established by the USEPA to assess whether closure requirements have been completed and no further action is required. The LARWQCB determined the soil assessments for Areas 6 through 9, and 11 through 13, to be complete because the soil sampling results indicate that the residual levels of chemicals in soil are at concentrations below Regional Screening Levels (RSLs). The LARWQCB is not requiring further action for these areas. However, the assessment for Area 10 is ongoing and includes monitoring groundwater for the South Campus. Consequently, the County has not received No Further Action or Case Closure letters because the LARWQCB considers the site as a whole, and thus the entire South Campus is still active due to ongoing investigation and remedial efforts at Area 10. Once Area 10 has been cleaned up to the satisfaction of the LARWQCB, which is evaluated in the Draft EIR as part of the Project, the County will request that LARWQCB issue a closure letter for the entire site. As stated on page 2-29 of Chapter 2, *Project Description*, of the Draft EIR, there is currently an open case with the LARWQCB, and a work plan is currently in development for approval by the LARWQCB to address the cleanup which would be implemented as part of the Project. The requested information is provided in the Draft EIR and no further revisions are necessary.

Response No. A1-4

This comment states that if soil contamination is suspected and encountered during Project construction, health and safety procedures should be implemented. The comment also requests identification of how investigation or remediation will be conducted and which government agency will provide regulatory oversight. As stated on page 3.7-26 of Section 3.7, *Hazards and Hazardous Materials*, as a part of the proposed Project, contaminated soil and groundwater

associated with the fuel leak under LACO No. 1276 would be removed from the site. The impact of encountering hazardous materials would be reduced to less than significant through the implementation of Mitigation Measures HAZ-1 and HAZ-2 discussed below. These mitigation measures require preparation of site-specific Health and Safety Plans (HASP) and Soil and a Groundwater Management Plan (SGMP). These plans shall be submitted to the County and the Downey Fire Department's Hazardous Materials Section for review and approval prior to construction. The HASP and SGMP would ensure that construction workers are provided appropriate training in the recognition and response to encountering hazardous materials, and that a plan is in place that provides procedures for the testing, handling, and disposal of hazardous materials. The HASP shall specify that in the event of potential soil or groundwater contamination, procedures will require providing notification to the Downey Fire Department Hazardous Materials Section and/or the LARWQCB. This planned removal action described in Section 2.5, *Soil and Groundwater Remediation*, along with implementing Mitigation Measures HAZ-1 and HAZ-2, would remove the hazardous materials and reduce the impact associated with contaminated soil and groundwater to less than significant. The requested information is provided in the Draft EIR and no further revisions are necessary.

Response No. A1-5

This comment provides additional contact information for DTSC for Preliminary Endangerment Assessment preparation and for cleanup oversight. As this comment does not concern any information addressed or contained in the Draft EIR and does not raise significant environmental issues, no further response is provided.

Letter A2

California Department of Transportation (Caltrans)
Miya Edmonson
IGR/CEQA Branch Chief
District 7 – Office of Regional Planning
100 S. Main Street, Suite 100
Los Angeles, CA 90012
Letter dated November 21, 2019
Received on November 21, 2019

Response No. A2-1

The County thanks the California Department of Transportation (Caltrans) for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project. In addition, pursuant to CEQA Guidelines Section 15088(b), the County of Los Angeles will provide any public agency that commented on the Draft EIR with a response to the agency's comments (either as a printed copy or in an electronic format) at least 10 days before considering certification of the Final EIR.

This comment acknowledges receipt of the NOC/NOA and provides a summary of the proposed Project that matches the description as provided in Chapter 2, *Project Description*, of the Draft EIR. It also states the closest State facilities to the proposed Project are Interstate (I)-710 and I-105 Freeways. As this comment does not contain any information that is not already included in the Draft EIR, no further response is required. However, this comment is noted and will be presented to the decision makers for their review and consideration.

Response No. A2-2

This comment suggests that the provided parking under the proposed Project and lack of mixed land uses may induce demand for additional vehicle trips, but provides no specific comments on the project's trip generation rates. The Draft EIR made conservative assumptions regarding the project's trip generation, which are not addressed in the comment. As discussed in Section 7.1, Project Traffic Generation, of Appendix H of the Draft EIR, the Project utilized the Institute for Transportation Engineers trip generation rates based on the number of County employees that would be on the Project Site (3,000 employees total), which results in a higher forecast of trip generation as compared to using trip generation rates based on the proposed 650,000 square feet of building floor area (63 percent higher in the AM, and 31 percent higher in the PM), thus ensuring "a conservative ('worst case') assessment of potential traffic impacts due to the project." As further discussed on page 3.11-13 of Section 3.11, *Transportation*, of the Draft EIR, while these vehicle trips would represent trips being made by existing employees that are being relocated from the other County facilities, the analysis conservatively assumed that all of these trips are new trips, rather than redistributed existing trips. Finally, while the Project Site is well-

served by public transit services, the trip generation estimates took no reductions for potential trips that would be made by public transit, bicycling or other modes in lieu of private automobiles, thus ensuring that the traffic analysis was conservative. (Section 7.1 of Appendix H, Traffic Impact Study, of the Draft EIR)

The commenter also suggests design and management principles that are addressed below in Responses to Comment Nos. A2-3 through A2-6.

Response No. A2-3

The commenter suggests the proposed Project reduce the amount of parking provided and include strategies in a Transportation Demand Management (TDM) program to assist with this reduction, specifically referencing a Federal Highway Administration’s document for guidance.

The Project already includes Mitigation Measure AIR-5 (MM-AIR-5) as provided on page 3.2-40 in Section 3.2, *Air Quality*, of the Draft EIR. MM-AIR-5 requires the County prepare a TDM program to reduce the use of single use vehicles by increasing the number of trips by walking, bicycle, carpool, vanpool and transit. This TDM program includes many of the generic concepts referenced in the FHWA guidance reference in the comment including:

- Provide a transportation information center and on-site TDM coordinator (one for each government building, three total) to educate residents, employers, employees, and visitors of surrounding transportation options;
- Promote bicycling and walking through design features such as exclusive access points, secured bicycle parking or a bicycle valet system, a bicycle sharing or rental program, showers for employees, self-service bicycle repair area, wayfinding signage, etc. around the Project Site
- Provide on-site car share amenities for employees who make only occasional use of a vehicle, as well as others who would like occasional access to a vehicle of a different type than they use day-to-day;
- Promote and support carpool/vanpool/rideshare use through parking incentives and administrative support, such as ride-matching service; and
- Incorporate incentives for using alternative travel modes, such as preferential load/unload areas or convenient designated parking spaces for carpool/vanpool users.

Page 2-26 in Chapter 2, *Project Description*, of the Draft EIR, states that the parking supply of 2,167 spaces is based on 80 percent of the employee “headcount” with an additional one percent of parking supply available for visitors. Consequently, the County has already incorporated the concept recommended by the commenter into the Project. Reducing parking supply further is not required to implement the TDM program proposed for MM-AIR-5. In fact, further reductions in parking supply beyond what has been proposed may result in undesired adverse effects, such as employees and/or visitors associated with the proposed Project seeking parking on nearby local streets if the on-site parking supply is insufficient.

Response No. A2-4

This comment suggests that if parking structures need to be built, they should be designed in a way that is conducive to adaptive reuse. This comment does not relate to the environmental analysis contained in the Draft EIR, and no further response is necessary.

Response No. A2-5

This comment notes that the Project Site is immediately adjacent to a planned light rail station along the West Santa Ana Branch Transit Corridor and states that the Draft EIR did not contain elements that demonstrated that the addition of the light rail station would improve walkability and encourage future light rail users. The proposed West Santa Ana Branch Transit Corridor and associated Gardendale Station, which abuts the southwest corner of the Project Site is included as a related project as provided in Table 2-8, *Cumulative Projects in the Vicinity of the Project Site*, on page 2-39 in Chapter 2, *Project Description*, of the Draft EIR, and was considered in the cumulative analysis of the proposed Project. However, the Gardendale Station has an opening date of 2041. As this related project would become operational 22 years after the proposed Project is occupied, there is uncertainty related to the improvements related to walkability and future light rail users. As such, the Draft EIR conservatively does not rely on the operation of the West Santa Ana Branch Transit Corridor and associated Gardendale Station for determination of impacts and analysis. Page 2-38 of the Draft EIR indicates that Metro is advancing the project as a Public Private Partnership that may potentially accelerate the project opening earlier than 2041. (Refer to pages 2-4 and 2-38 of the Draft EIR.) However, this does not preclude the project from taking advantage of such transportation options if and when they become available. No revisions to the Draft EIR are necessary.

Response No. A2-6

The commenter notes the proposed Project's inclusion of improvements to interior roadways, and indicates the opportunity to create a safe and comfortable streetscape, including reduced speeds and a number of specific improvements in order to minimize pedestrian and bicycle injury. Pages 2-25 through 2-27 in Chapter 2, *Project Description*, of the Draft EIR provide a discussion of the on-site roadways and associated roadway improvements reflecting the commenter's suggestions. The internal streets would be designed to County zoning and design standards, including facilities for vehicles, pedestrians and bicycles. Standard regulatory and warning signs, supplemented with pavement markings as-needed, would be provided to regulate vehicle speeds and urge caution for pedestrian crossings. The implementation of flashing beacons or other indicators as suggested in the indicated are not expected to be required. The comment does not identify a specific question or concern with respect to the analysis of transportation impacts provided in the Draft EIR. Therefore, no revisions to the Draft EIR are required.

Response No. A2-7

The comment concurs with Mitigation Measure TRA-1 (MM-TRA-1) described on page 3.11-16 in Section 3.11, *Transportation*, of the Draft EIR. Mitigation Measure MM-TRA-1 recommends that the County instruct the contractor to prepare a construction traffic management plan (CTMP)

to alleviate construction period impacts. The comment specifically cites the provision in Mitigation Measure MM-TRA-1 related to “Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.” The language incorporated into MM TRA-1 is nearly identical to the language utilized in the *Manual on Uniform Traffic Control Devices* (MUTCD) as suggested in the comment. Therefore, no revisions to Mitigation Measure MM-TRA-1 are required.

Response No. A2-8

This comment refers to the Traffic Impact Study provided in Appendix H of the Draft EIR and states that since Caltrans is responsible for obtaining measures that will off-set significant impacts to State facilities, the Congestion Management Plan (CMP) guidance requiring analysis of freeway monitoring locations if the proposed Project will add 150 or more vehicle trips does not apply. The commenter’s opinion is noted. The County is the Lead Agency for this EIR and therefore determines the scope of analysis related to the assessment of potential Project-related impacts to the roadway network, including the State highway system. The comment refers to the finding on page 3.11-33 in Section 3.11, *Transportation*, of the Draft EIR that the Project’s traffic impacts to the CMP freeway segments would be less than significant. This is because, as stated on page 82 of the Traffic Impact Study provided in Appendix H of the Draft EIR (and page 3.11-6 of the Draft EIR), the Project is not forecast to add more than 150 peak hour vehicles in any direction to a freeway mainline segment in the Project vicinity. The CMP was specifically prepared to analyze impacts under CEQA to state highways. (Gov. Code, § 65089(b)(4) and (c).) As discussed in the CMP: “This CMP Land Use Analysis Program has [] been structured to coincide with and be implemented through the CEQA process.” The CMP further explains that “The objective of this [CMP] process is to identify site-specific impacts and mitigation for the regional *highway, freeway...systems...*” While Caltrans may disagree with this approach, Caltrans’ LOS guidance offers no significance thresholds under CEQA.

This comment also states that the Metropolitan Transportation Authority (MTA) stipulates that Caltrans must be consulted to identify specific locations to be analyzed on the State Highway System. Caltrans was consulted with respect to the preparation of the Draft EIR. The Notice of Preparation (NOP) of the Draft EIR, which is contained in Appendix A of the Draft EIR, was circulated to Caltrans. In response, Caltrans submitted a letter to the County dated September 8, 2017 providing its comments. The Caltrans letter primarily focuses on suggestions to reduce vehicle trips generated by the Project. The Caltrans letter does not request an operations analysis related to the State highway system, nor does it recommend analysis of specific locations. Therefore, no revisions are required to the analysis of transportation impacts to the State highway system as provided in the Draft EIR.

Response No. A2-9

The commenter asserts that “no freeway segment analysis was conducted” and then recommends that a freeway analysis be conducted for the westbound I-105 Freeway. The comment refers to Figure 7-3 provided in the Traffic Impact Study contained in Appendix H of the Draft EIR.

Figure 7-3 provides the forecast of Project-related trips at the study intersections during the PM peak hour.

The commenter is incorrect that no freeway analysis was conducted. The Traffic Impact Study indicates that the 95 PM peak hour trips added to the westbound I-105 Freeway is based on the number of vehicles turning right from southbound Garfield Avenue to the westbound I-105 Freeway on-ramp at Intersection No. 10. As discussed in Response to Comment No. A2-8, above, a screening analysis of the mainline freeways was performed, consistent with the guidance provided in the CMP, but additional more detailed analysis was not warranted because the project would not exceed 150 peak hour trips in any direction. Utilizing such a screening threshold is fully consistent with CEQA. CEQA Guidelines section 15128 explains “The EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant *and were therefore not discussed in detail.*” CEQA Guidelines section 15204(a) also explains that “the adequacy of the EIR is determined in terms of what is reasonably feasible, in light of ...the severity of its likely environmental impacts.” Other public agencies utilize similar screening criteria to determine whether a detailed analysis is warranted. For example, the Bay Area Air Quality Management District (BAAQMD) has established a volume of 44,000 vehicles per hour as a screening threshold to determine whether a more detailed carbon monoxide (CO) analysis is warranted. Refer to page 3-3 of the BAAQMD Guidance (BAAQMD, 2017).

Nevertheless, a Revised Traffic Impact Study (refer to Appendix H-2 to this Final EIR), which updates the Traffic Impact Study provided in Appendix H of the Draft EIR, provides a table summarizing the analysis of mainline freeway segments in the Project vicinity, specifically for the segments of I-105 Freeway west of Garfield Avenue and east of Paramount Boulevard. Tables 17-3 and 17-4 of the Revised Traffic Impact Study have been prepared to provide the mainline freeway segment analysis requested in the comment for Existing and Future conditions, respectively. Note that the mainline freeway segment analysis is provided for informational purposes only. The impact conclusions provided in the Draft EIR related to the Project’s potential impacts to the freeway network, which found impacts to be less than significant, have not changed.

The County further finds that such analysis is not grounds for recirculation. (See *Merced Alliance for Responsible Growth v. City of Merced* (2012 WL 5984917)). The Court in *Merced Alliance* concluded that recirculation was not required when the public agency provided additional traffic analysis requested by the commenter. In *Merced*, petitioners alleged that “...the city’s late-submitted information on traffic impacts triggered the requirement that the EIR be recirculated.” (Slip Opinion at 65.) “[The Lead Agency] prepared a response that explained in detail why the methodologies used in its traffic study were sound. In addition, to allay [Plaintiff’s] concern, [the Lead Agencies’ consultants] conducted an analysis of the study intersections using the baseline [Plaintiffs] suggested - the existing condition plus project-generated trips. This analysis showed that ‘there would be no new findings compared to the DEIR traffic analysis.’ The challengers argue that, because the respondents cited [the Lead Agency’s] analysis to defend the EIR before the superior court, this must have been significant new information that required recirculation. Once again, their recirculation argument fails. The [lead agency’s] response letter and new analysis did not disclose a new significant impact, increase the severity of an impact,

identify a feasible project alternative or mitigation measure, or ‘deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect...’. [Laurel Heights II, supra, 6 Cal.4th at p. 1129.] The letter and analysis were prepared especially to respond to [Plaintiff’s] concerns, not to change any aspect of the project, mitigation measures, or findings and conclusions in the EIR.” (Slip Opinion at 77-78.)

Response No. A2-10

The comment alleges that no threshold of significant for determination of impacts on Caltrans on- and off-ramp terminal intersections was provided and recommends it be provided.

The commenter is incorrect that the EIR did not disclose a significance threshold. The commenter appears to be referencing the analysis included under Impact Threshold TRA-3, which asks whether the project would “substantially increased hazard to a geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).” The EIR goes on to further specify under TRA-3, that for “Caltrans Freeway Off-Ramp Assessment” that the analysis utilized a threshold asking “whether the length of the ramps were sufficient to accommodate vehicle queue lengths.” (Refer to page 3.11-31 of Section 3.11, *Transportation*, of the Draft EIR.) As described in the Draft EIR under Impact TRA-3, because the forecast vehicle queues at the off-ramps both without and with the forecast Project-related vehicle trips are not expected to exceed the storage capacity of the off-ramps, impacts are less than significant.

It should also be noted that the Draft EIR included an LOS analysis for the intersection at the I-710 Off-Ramp and Wright Road (Intersection 2), Intersection 10 (associated with I-710 north and south on-ramps and I-105 west on-ramp), Intersection 11 (associated with the I-105 east off-ramp and the I-710 north and south off-ramps), Intersection 21 (associated with the I-105 west off-ramp), Intersection 22 (which is associated with the I-105 east on-ramp) which were analyzed utilizing the LOS significance thresholds identified in Section 3.11.3. However, as noted in greater detail in the subsequent response, many of these freeway ramps do not directly tie into an intersection, but rather merge with an existing roadway segment before or after entering or exiting the intersections referenced in this paragraph.

Response No. A2-11

This comment alleges that the north bound and southbound on- and off- ramps to and from Imperial Highway were not included in the Traffic Impact Study. Refer to Response to Comment No. A2-10, above, for a discussion of the analysis of freeway off-ramps as provided in the Draft EIR. Furthermore, the Draft EIR included analysis of Intersections 1, 3, 4, 5, 12, 13, and 14 along Imperial Highway which analyze traffic impacts associated within the I-710 ramps.

The I-710 Freeway off-ramps at Imperial Highway cited in the comment are not signalized at their termini; instead, the off-ramps merge onto the respective eastbound or westbound segments of Imperial Highway. Further, traffic from the off-ramps have their own travel lanes when entering Imperial Highway, thereby resulting a negligible amount of queuing on the off-ramps.

Accordingly, no additional analysis is required. (See also *East Sacramento Partnership for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281 [EIR can elect to analyze intersections rather than roadway segments].)

Response No. A2-12

This comment states that data sheets provided in Appendix F of the Traffic Impact Study do not use the actual signal timing plan and recommends that the intersection be reevaluated with the correct cycle length. Refer to Response Nos. A2-10 and A2-11, above, for a discussion of the analysis of freeway off-ramps provided in the Draft EIR. The comment is correct that the analysis for the I-105 Freeway eastbound off-ramp at Garfield Avenue used a 90-second cycle length for the traffic signal operation. As requested in the comment, the queuing analysis has been updated to reflect a 70-second cycle length for the traffic signal operation. Revised Tables 17-1 and 17-2 are provided in the redlined Traffic Impact Study contained in the Final EIR. It is noted that the incorporation of the updated traffic signal cycle length did not change the findings of the Traffic Impact Study related to potential vehicle queues for the off-ramp. Briefly, the updated queuing analysis concludes that the eastbound I-105 Freeway off-ramp provides adequate storage to accommodate the forecast vehicle queuing with Project-related traffic. As this additional analysis does not result in new impacts and does not provide significant new information, recirculation per CEQA Guidelines Section 15088.5 is not required.

Response No. A2-13

This comment states that transportation of heavy construction equipment and/or materials would require a transportation permit from Caltrans. The Project would implement Mitigation Measure MM-TRA-1, which would require a construction traffic management plan (CTMP) to formalize how construction would be carried out and identify specific actions that would be required to reduce the effects on the surrounding community. This measure already includes provisions for scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours. Required permits from Caltrans including provisions for the movement of large trucks and hours of operation, would be sought by the contractor. A revision to the second to last bullet of Mitigation Measure MM-TRA-1 on page 3.11-15 of the Draft EIR is shown below and is included in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of the Final EIR.

- ~~Coordinate~~ Consultation with the City of Downey and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residence.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it. As this comment provides information that is already provided and considered in the Draft EIR, no further response is required. However, this comment is noted and will be presented to the decision makers for their review and consideration.

Response No. A2-14

This comment provides the contact information for the project coordinator. As this comment does not concern any information addressed or contained in the Draft EIR, no further response is required. However, this comment is noted and will be presented to the decision makers for their review and consideration.

Letter A3

State of California Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
Scott Morgan, Director
1400 Tenth Street
P.O. Box 3044
Sacramento, CA 95812-3044
Letter dated November 22, 2019
Received on December 4, 2019

Response No. A3-1

The County thanks the State of California Governor's Office of Planning and Research (OPR) or submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project. In addition, pursuant to CEQA Guidelines Section 15088(b), the County of Los Angeles will provide any public agency that commented on the Draft EIR with a response to the agency's comments (either as a printed copy or in an electronic format) at least 10 days before considering certification of the Final EIR.

This comment acknowledges receipt of the Draft EIR by the State Clearinghouse and that circulation of the Draft EIR to State Agencies has occurred through the State Clearinghouse's distribution process. The comment further states that the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act have been met. The comment does not include statements regarding the content of the Draft EIR, does not raise significant environmental issues, and requires no further response.

Letter B1

County of Los Angeles Fire Department
Michael Y. Takeshita, Acting Chief, Forestry Division
Prevention Services Bureau
1320 North Eastern Avenue
Los Angeles, CA 90063-3294
Letter dated November 5, 2019

Response No. B1-1

The County thanks the County of Los Angeles Fire Department (LACFD) for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment acknowledges the LACFD's receipt of the Notice of Availability. The remainder of the comment is addressed below in Responses to Comment Nos. B1-2 through B1-5.

Response No. B1-2

This comment states that the Project is located within the City of Downey and would therefore not have any impact on the emergency responsibilities of LACFD. As stated within the comment letter and on page 5-8 of Chapter 5, *Other CEQA Considerations*, of the Draft EIR, the City of Downey Fire Department (DFD) would provide fire protection services to the Project Site. As this comment does not concern any information addressed or contained in the Draft EIR and does not raise significant environmental issues, no further response is necessary.

Response No. B1-3

This comment includes a listing of requirements provided by the LACFD Land Development Unit related to the building and construction standards that would be verified through the building fire plan check process with the County. The Project will be designed to meet all applicable requirements identified in this letter and established by regulatory requirements. As stated within the comment letter and on page 5-8 of Chapter 5, *Other CEQA Considerations*, of the Draft EIR, the City of Downey Fire Department (DFD) would provide fire protection services to the Project Site.

Response No. B1-4

This comment requests that erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archaeological and cultural resources, and the County Oak Tree Ordinance should be discussed in the Draft EIR. Each of these topics are adequately addressed throughout the Draft EIR. Erosion control and watershed management are discussed in Section 3.8, *Hydrology and Water Quality*, of the Draft

EIR. Rare and endangered species, vegetation, and the County Oak Tree Ordinance are discussed in Section 3.3, *Biological Resources*, of the Draft EIR. As discussed in Section 3.7, *Hazards and Hazardous Materials*, and on page 5-9 of Chapter 5, *Other CEQA Considerations*, the Project is not located within an area designated as a very high fire hazard severity area. Archaeological and cultural resources are discussed in Section 3.4, *Cultural Resources*, of this Draft EIR. Therefore, all requested areas have been addressed within the Draft EIR.

The comment also states that if oak trees are known to exist in the project area, further field studies should be conducted to determine the presence of oak trees on the Project Site. A comprehensive tree inventory was conducted as part of the Draft EIR (Refer to Appendix C). As described on page 3.3-21 of Section 3.3, *Biological Resources*, that there are seven coast live oak trees (*Quercus agrifolia*) in good condition on the Project Site. As described on pages 3.3-14 and 3.3-21, although the proposed Project is exempt from obtaining a permit under the Los Angeles County Oak Tree Ordinance, any encroachment or removal requests must be approved by the County of Los Angeles Department of Regional Planning prior to commencement of any work on-site. Additionally, the Project would implement mitigation measure MM-BIO-3, which requires any removed oak to tree to be replaced with planting coast live oaks at a 2:1 ration within the Rancho Los Amigos South Campus to mitigate any impacts to oak trees to a less than significant level. The comment finally states that the Forestry Division has no further comments regarding the Project.

Response No. B1-5

This comment states that the Health Hazardous Materials Division of the LACFD advises that the Los Angeles Regional Water Quality Control Board (LARWQCB) oversees the cleanup of the contaminated soil and groundwater at the Project Site. Section 3.7, *Hazards and Hazardous Materials*, of the Draft EIR addresses the contamination on the Project Site and that status of coordination with the LARWQCB. As stated on page 3.7-13 of the Draft EIR, “ongoing remedial activities to address impacted groundwater will continue to be conducted under the oversight of the LARWQCB in order to achieve regulatory closure requirements for this area.” As stated on page 2-29 of Chapter 2, *Project Description*, of the Draft EIR, there is currently an open case with the LARWQCB, and a work plan is currently in development for approval by the LARWQCB to address the cleanup which would be implemented as part of the Project. The requested information is provided in the Draft EIR and no further revisions are necessary.

Letter B2

Los Angeles County Sheriff's Department
Alex Villanueva, Sheriff
Tracy Jue, Director
Letter dated November 21, 2019
Received on November 21, 2019

Response No. B2-1

The County thanks the Los Angeles County Sheriff's Department for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment acknowledges receipt of the NOA and provides a summary of the Project that matches the description as provided in Chapter 2, *Project Description*, of the Draft EIR. As this comment does not contain any information that is not already included in the Draft EIR and does not raise significant environmental issues, no further response is required.

Response No. B2-2

This comment states that the Project Site's law enforcement services would be provided by the Department's County Services Bureau (CSB). This comment also provides an introduction to the attached review letter, responses of which are included in Responses to Comment Nos. B2-4 through B2-7.

Response No. B2-3

This comment provides the contact information for the CSB. As this comment does not concern any information addressed or contained in the Draft EIR and does not raise significant environmental issues, no further response is required.

Response No. B2-4

This comment acknowledges receipt of the NOA and provides a summary of the Project that matches the description as provided in Chapter 2, *Project Description*, of the Draft EIR. As this comment does not contain any information that is not already included in the Draft EIR and does not raise significant environmental issues, no further response is required.

Response No. B2-5

This comment states that the CSB remains concerned that new development on the South Campus will require additional personnel, radio cars, security vehicles, as well as parking spaces. The comment also states that CSB will need office space for existing and additional CSB personnel and

equipment. As stated on page 5-8 of Chapter 5, *Other CEQA Considerations*, of the Draft EIR, the County will continue to coordinate security measures with LASD as needed throughout Project construction and operation. While the comment states that the CSB will need additional space and equipment, these request will not result in substantial adverse physical impacts associated with the provision or need for new or physically altered police protection facilities, as security needs and considerations would be integrated into the final Project design. Therefore, while the County will continue to coordinate security measures with LASD and CSB, impacts related to police protection services would be less than significant.

Response No. B2-6

The commenter states that the CSB continues to be concerned with vandalism and burglaries at the Project Site during construction. As stated on page 5-8, it is likely that with the addition of new buildings and security features, there will be a decrease in the amount of CSB security needed across the Project Site as the Project Site would transition from a largely unoccupied campus to an operational and functional facility. As stated in the comment, CSB appreciates the partnership with the County, City, public safety, and continued coordination of security measures. As stated in Response to Comment No. B2-5, the County will continue to coordinate security measures with LASD and CSB throughout construction and operation of the Project.

Response No. B2-7

This comment states that the CSB has no further comments at the time. The comment further provides contact information for the CSB. As this comment does not contain any information that is not already included in the Draft EIR and does not raise significant environmental issues, no further response is required.

Letter B3

Sanitation Districts of Los Angeles County
Adriana Raza, Customer Service Specialist
Facilities Planning Department
1955 Workman Mill Road
Whittier, CA 90601-1400
Letter dated November 22, 2019
Received on November 22, 2019

Response No. B3-1

The County thanks the Sanitation Districts of Los Angeles County for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment acknowledges receipt of the Notice of Availability and references the Sanitation Districts' comment letter on the NOP, which is provided as part of Appendix A of the Draft EIR and was considered during preparation of the Draft EIR analysis. This comment provides an introduction to the remaining comments on the Draft EIR. Detailed responses are provided in Responses to Comment Nos. B3-2 through B3-8.

Response No. B3-2

The commenter indicates that, based on the land uses provided in the Draft EIR project description, the expected average wastewater flow is 130,000 gallons per day. As stated on page 3.13-12 of Section 3.13, *Utilities and Service Systems*, for purposes of this Draft EIR, the water demand for the Project Site can be approximately translated to the wastewater flows. Therefore, 184.7 acre-feet per year (AFY) for water demand is considered to be a conservative estimate for wastewater generation as this amount would also include irrigation that does not result in wastewater generation. For consistency in the wastewater analysis, the 184.7 AFY is converted to 164,890 gallons per day. Therefore, the Draft EIR's conservative estimate for wastewater flow would continue to be more than the updated wastewater flow estimate provided in the Sanitation Districts of Los Angeles County November 22, 2019 comment, and no revision to the Draft EIR is necessary.

Response No. B3-3

This comment states that the Sheriff's Crime Laboratory, which was described as part of the Project in the Notice of Preparation, is noted on page 3.9-2, *Land Use and Planning*, as being part of the surrounding land uses. The comment is correct in that the laboratory uses would no longer apply to the Project and there is no anticipated expansion for the laboratory. Therefore, no changes are needed.

Response No. B3-4

This comment states that the Districts maintain sewage facilities within the Project Site which may be affected by the Project. Approval to construct improvements would be required before construction may begin. As stated on page 3.13-13 of Section 3.13, *Utilities and Service Systems*, of the Draft EIR, all water and sewer pipeline connections to serve the new buildings would be situated within the Development Area and would directly serve the Project. Final design criteria and specifications for all water and wastewater facilities would comply with all applicable requirements and policies, and all approvals would be sought from the Sanitation Districts prior to construction.

Response No. B3-5

This comment states that the Joint Water Pollution Control Plant (JWPCP) currently provides an average flow of 261.1 million gallons per day (mgd), and that the monthly average effluent dry weather discharge flow rate to the headworks of the JWPCP shall not exceed the dry weather flow capacity of 400 mgd and an instantaneous maximum of 675 mgd during wet weather storm events. This information regarding the dry weather flow capacity and instantaneous maximum during wet weather storm events matches what is provided on page 3.13-2 of Section 3.13, *Utilities and Service Systems*, of the Draft EIR. The Draft EIR used an average flow of 260 mgd of wastewater for the analysis. This revision on page 3.13-2 of the Draft EIR is shown below and in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of the Final EIR. This revision does not constitute significant new information or affect a substantial change in the analysis in the Draft EIR.

In addition to providing wastewater conveyance services...The JWPCP treats approximately ~~260~~ 261.1 million gallons of wastewater per day (mgd) (LACSD, 2017).

Response No. B3-6

This comment requests a revision to the 260 mgd figure that was previously stated under Response to Comment No. B3-5. This revision on page 3.13-2 of the Draft EIR is shown below and in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of the Final EIR. This revision does not constitute significant new information or affect a substantial change in the analysis in the Draft EIR.

In addition to providing wastewater conveyance services...The JWPCP treats approximately 260 261.1 million gallons of wastewater per day (mgd) (LACSD, 2017).

Response No. B3-7

This comment requests a revision to the figures under Impact UTL-3 to reduce the amount of wastewater that would be generated by the Project. As stated under Response to Comment No. B3-2, the number that was used in the Draft EIR is conservative and would not warrant a revision to a smaller figure. However, as requested by the Districts, the percentage calculation used in the analysis will be adjusted to reflect a percentage of the 400 mgd to reflect dry weather low

capacity rather than the 675 mgd for instantaneous maximum capacity during wet weather storm events. This revision on page 3.13-2 of the Draft EIR is shown below and in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of the Final EIR. This revision does not constitute significant new information or affect a substantial change in the analysis in the Draft EIR.

Wastewater generated by the proposed Project...The JWPCP currently processes an average flow of ~~260~~ 261.1 mgd. JWPCP has the capacity to treat up to 675 mgd of primary, ~~and~~ secondary, ~~and~~ tertiary wastewater. The Project would conservatively generate 0.164 mgd of wastewater, or approximately ~~0.024~~ 0.041 percent of JWPCP's dry weather capacity of ~~675~~ 400 mgd of primary, secondary, and tertiary wastewater and ~~0.064~~ 0.063 percent of JWPCP's current average flow.

Response No. B3-8

This comment states that all other information in the Draft EIR is current and provides contact information for the commenter as needed.

Letter B4

City of Paramount Planning Department
 John Carver, Planning Director
 16400 Colorado Avenue
 Paramount, CA 90723-5012
 Letter dated November 21, 2019
 Received on November 22, 2019

Response No. B4-1

The County thanks the City of Paramount Planning Department for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment provides a brief summary of the Project and serves as an introduction to the remainder of the letter. As this comment does not contain any information that is not already included in the Draft EIR, no further response is required. However, this comment is noted and will be presented to the decision makers for their review and consideration. Detailed responses to the remainder of the letter are provided in Responses to Comment Nos. B4-2 through B4-4.

Response No. B4-2

This comment expresses concern regarding the traffic impacts to the neighborhoods south and east of the proposed Project, including the residential neighborhood within the City of Paramount. The Traffic Impact Study, provided in Appendix H of the Draft EIR, analyzed four intersections that are within the jurisdiction of the City of Paramount, including Intersection No. 10, Garfield Avenue/N. Somerset Ranch Road, Intersection No. 11, Garfield Avenue/S. Somerset Ranch Road, Intersection No. 20, Paramount Boulevard/Gardendale Street, and Intersection No. 23, Downey Avenue/Gardendale Street, identified on pages 9-10 in Appendix H.

The comment requests the project incorporate street-widening and traffic signal mitigations. As analyzed and summarized in Section 3.11, *Transportation*, of the Draft EIR, under the Future with Project scenario, significant impacts would not occur at Intersection No. 10, Garfield Avenue/N. Somerset Ranch Road; Intersection No. 11, Garfield Avenue/S. Somerset Ranch Road; and Intersection No. 23, Downey Avenue/Gardendale Street. Because no significant impacts would occur at these intersections, no mitigation measures are required.

However, significant impacts would occur at Intersection No. 20, Paramount Boulevard/Gardendale Street. The commenters' suggestions to incorporate street-widening and traffic signal mitigations are infeasible at this intersection. As discussed on page 3.11-29 in Section 3.11, *Transportation*, of the Draft EIR, Intersection No. 20, Paramount Boulevard/Gardendale Street is completely built-out, meaning that no street improvements would be possible without modifying the existing curb-to-curb street widths. Modifying the existing

curb-to-curb street widths would likely require the acquisition of private property and removal of businesses located adjacent to the intersection, which would be infeasible for economic, legal, and policy reasons. In addition, as noted in footnote 4 on page 3.11-29 of Section 3.1, *Transportation*, of the Draft EIR, Caltrans issued the Local Development Intergovernmental Review Project Interim Guidance Implementing Caltrans Strategic Management Plan 2014-2020 Consistent with Senate Bill (SB) 743, which provided recommendations to reduce vehicle miles traveled (VMT) generation and improve pedestrian, bike, and transit service rather than providing recommendations that primarily accommodate motor vehicle travel. The comment requesting street-widening and traffic signal mitigations would directly conflict with Caltrans's recent guidance. Additional environmental impacts associated with demolition and construction, such as noise and air quality and removal or shortening of existing sidewalks/pedestrian facilities, and inconsistency with policy objectives of providing "a cohesive civic district" make mitigation infeasible. As there are no reasonable or feasible mitigation measures available at this intersection, the impact of the proposed Project would remain significant and unavoidable. No revisions to the EIR are necessary.

The comment also requests to maximize safe pedestrian routes and active transportation elements surrounding the Project. During construction, safety precautions for pedestrians and bicyclists would be implemented through MM-TRA-1, which requires the development of a Construction Traffic Management Plan. During operation, the Project would include development of pedestrian walkways that would be designed to provide safety to the pedestrians. In addition, the Project would be consistent with the County General Plan, which emphasizes the use of bicycles as an alternate mode of transportation, as the Project would provide bicycle parking spaces, which would encourage use of the existing bicycle facilities that surround the Project Site.

Response No. B4-3

This comment states the commenter's concern regarding air quality impacts during construction and operation. Section 3.2, *Air Quality*, of the Draft EIR presents a detailed quantified analysis regarding the potential effects on air quality associated with air emissions generated by the construction and operation of the Project. As provided under Subsection 3.2.4, *Methodology*, of Section 3.2, *Air Quality*, of the Draft EIR, the assessment of construction air quality impacts considered emissions sources including use of heavy-duty construction equipment, vehicle trips generated from workers and haul trucks travelling to the Project Site and fugitive dust emissions from demolition and various soil-handling activities. During operation, the assessment of operational air quality impacts considered Project-generated vehicle trips traveling to and from the Project Site, energy sources on-site such as natural gas combustion, area sources such as landscaping equipment and the use of consumer products, and from the use of on-site diesel-fueled emergency generators. Air quality emissions for both construction and operation were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2. As noted on page 3.2-22 of Section 3.2, *Air Quality*, of the Draft EIR, the South Coast Air Quality Management District (SCAQMD) has established numerical emission indicators and significance for construction and operation, and the analysis provided in Section 3.2, *Air Quality*, of the Draft EIR, is based on these thresholds of significance.

Page 3.2-7 of Section 3.2, *Air Quality*, of the Draft EIR lists sensitive receptors in close proximity (or within 500 feet) of the Project Site. Impacts to sensitive receptors were found to be less than significant with mitigation. In addition, Subsection 3.2.2, Regulatory Framework, of Section 3.2, *Air Quality*, of the Draft EIR, provides a summary of the pertinent air quality regulatory framework affecting the Project at the federal, state, local levels, including a list of applicable California Code of Regulations sections and applicable SCAQMD rules and regulations. In particular, as detailed under Subsection 3.2.5, Regulatory Requirements, of Section 3.2, *Air Quality*, of the Draft EIR, the Project would comply with regulatory requirements including SCAQMD Rule 403, SCAQMD Rule 1113, Section 2485 in Title 13 of the California Code of Regulations, Section 93115 in Title 17 of the California Code of Regulations, and Title 24, Part 11 of the California Code of Regulations. The Project would also be designed to obtain a Leadership in Energy and Environmental Design (LEED) Gold level of certification.

The Draft EIR found that during construction, the inclusion of Mitigation Measure MM-AIR-1, which requires adherence to coating requirements under South Coast Air Quality Management District (SCAQMD) Rule 1113, and Mitigation Measure MM-AIR-2, which requires use of off-road equipment meeting Environmental Protection Agency (EPA) Tier 4 standards, would reduce VOC and NO_x emissions to be below SCAQMD regional thresholds. The reduced regional construction air quality emissions are presented in Table 3.2-5 on page 3.2-36 of Section 3.2, *Air Quality*, of the Draft EIR. In addition, the Health Risk Assessment (HRA) evaluated the potential for increased health risks for off-site sensitive receptors due to the Project construction activities.

During operation, as illustrated in Table 3.2-6 on page 3.2-37 of Section 3.2, *Air Quality*, of the Draft EIR, regional NO_x emissions were conservatively found to exceed the SCAQMD regional thresholds during construction. Mitigation Measures MM-AIR-3 and MM-AIR-4 would both serve to reduce NO_x emissions related to emergency generators as they require only one emergency generator to be maintained on a given day and the emergency generators selected would be new stand by generators meeting EPA Tier 4 standards. These mitigation measures would reduce NO_x emissions from emergency generators by 75 percent. In addition, implementation of a transportation demand management (TMD) program, as required by Mitigation Measure MM-AIR-5, would also reduce NO_x by decreasing mobile trips; however, because it is too speculative to assume the extent of the participation of the TMD program, no reduction of emissions were assumed in the analysis provided in the Draft EIR. As such, even with implementation of mitigation measures, regional operational emissions would be significant and unavoidable, as illustrated in Table 3.2-7 on page 3.2-37 of Section 3.2, *Air Quality*, of the Draft EIR.

As air quality emissions decrease with increasing distance from the emission source, due to wind dispersion (i.e., NO_x and CO) and settling of particulate air pollutants (i.e., PM₁₀ and PM_{2.5}), localized air quality impacts to the City of Paramount during both construction and operation would be less than those disclosed for the Project in the Draft EIR. The proposed Project would comply with all applicable SCAQMD requirements as listed in the SCAQMD Rules and Regulations subsection on page 3.2-18 in Section 3.2, *Air Quality*, of the Draft EIR. No revisions to the EIR are necessary.

Response No. B4-4

This comment serves as a conclusion to the comment letter and provides contact information as needed, and no specific response is required.

Letter B5

City of South Gate Community Development Department
 Joe Perez, Director of Community Development
 8650 California Avenue
 South Gate, CA 90280-3004
 Letter dated November 21, 2019
 Received on November 22, 2019

Response No. B5-1

The County thanks the City of South Gate Community Development Department for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment serves as an introduction to the remainder of the letter. Detailed responses to reach of the comments in this letter are provided in Responses to Comment Nos. B5-2 through B5-100.

Response No. B5-2

This comment states that the Draft EIR understated or ignored many of the Project's impacts and fails to identify effective mitigation for a number of key issue areas. The comment states that the Project would be regionally significant and would result in more than 7,443 new daily vehicle trips being generated within a relatively compact geographic area.

The comment correctly cites the Project's trip generation forecast, which is provided in the Draft EIR in Table 3.11-5 (7,443 daily trips, 1,038 AM peak trips and 884 PM peak trips). The comment does not provide supporting data or further elaboration to support the assertion that "...[t]he Draft EIR understated or ignored many of the proposed project's impacts and completely fails in the identification of effective mitigation for a number of key issue areas."

The Draft EIR provides an analysis of all potential Project-related environmental impacts, and, where potentially significant impacts might occur, feasible mitigation measures are proposed (refer to Chapter 3, *Environmental Impact Analysis*, of the Draft EIR). The Project was evaluated in accordance with those provisions of CEQA. With respect to traffic impacts, the Draft EIR made conservative assumptions regarding the Project's trip generation, which are ignored in the comment. As discussed in Section 7.1 Project Traffic Generation, of the Traffic Impact Study, provided in Appendix H of the Draft EIR, the Project utilized the Institute of Transportation Engineers (ITE) trip generation rates, and then adjusted those numbers upwards by 63 percent in the AM, and 31 percent in the PM, thus ensuring "a conservative ('worst case') assessment of potential traffic impacts due to the Project." (2) As further discussed on page 3.11-13 of Section 3.11, *Transportation*, of the Draft EIR, while these vehicle trips would represent trips being made by existing employees that are being relocated from the other County facilities, the analysis conservatively assumed that all of these trips are new trips, rather than redistributed existing trips.

(3) Additionally, the analysis assumed that the Project's trip generation would occur during the AM and PM Peak commuter hours; however, as noted on page 2-20 of Chapter 2, *Project Description*, of the Draft EIR, most employees in the proposed County ISD building (with up to 2,450 employees) would work a shift between 6:00 AM and 6:00 PM on weekdays. This would result in most employee traffic arriving prior to the AM commuter peak period beginning at 7:00 AM and departing after the end of the PM commuter peak period ending at 6:00 PM. (4) Finally, as discussed in Section 7.1 of the Traffic Impact Study, while the Project Site is well-served by public transit services, the trip generation estimates took no reductions for potential trips that would be made by public transit, bicycling or other modes in lieu of private automobiles, thus ensuring that the traffic analysis was conservative.

The Draft EIR also contains a comprehensive evaluation of existing and future traffic conditions to evaluate the Project's impacts to both the local and regional transportation network. Figure 3.11-1 in the Draft EIR indicates the location of the 27 study intersections evaluated for potential traffic impacts due to the Project, which extend out up to 1.5 miles from the Project Site. As indicated on page 3.11-1 of the Draft EIR, the study intersections were identified in consultation with the County of Los Angeles Department of Public Works, as well as the surrounding adjacent municipalities (including the City of South Gate).

The commenter specifically mentions the arterial roadway corridors of Imperial Highway, Firestone Boulevard, and Atlantic Avenue. Intersections along Imperial Highway and Atlantic Avenue are included as part of the study, and existing conditions for these intersections are presented in Table 3.11-3 (range from level of service [LOS] B to E). The existing traffic conditions at study intersections on Imperial Highway and Atlantic Avenue are considered in the LOS calculations summarized in Tables 3.11-6 and 3.11-8.

Intersections along Firestone Boulevard, located approximately two miles north of the Project Site, were determined not to require quantified LOS evaluation because trip distribution data indicated that Project-related trips would be substantially dispersed prior to utilizing Firestone Boulevard. Therefore, trips located that far north would be negligible. This approach is fully consistent with CEQA. (*South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 341 ["Further from the project site, traffic is dispersed among numerous streets and the project vehicle contributions to the intersections further away are decreased."].)

Atlantic Avenue and Firestone Boulevard intersection would experience only 5 percent of Project trips (52 AM peak hour trips and 44 PM peak hour trips out of an AM peak of 1,391 trips and a PM peak of 1,357 trips), while the Garfield Avenue and Firestone Boulevard intersection would experience only 2 percent of Project trips (21 AM peak hour trips and 18 PM peak hour trips out of an AM peak of 1,413 trips and a PM peak of 1,685 trips). Nevertheless, the Final EIR includes a Supplemental Analysis (Refer to Appendix H-3 to this Final EIR) that specifically evaluates the potential Project-related traffic impacts at two intersections along Firestone Boulevard: Atlantic Avenue/Firestone Boulevard and Garfield Avenue/Firestone Boulevard. This Supplemental Analysis was prepared in response to traffic-related comments received from the City of South Gate on the Draft EIR. As shown in the Supplemental Analysis, the potential traffic impacts at

Atlantic Avenue/Firestone Boulevard and Garfield Avenue/Firestone Boulevard confirm that Project-related impacts in these locations would be less than significant based on the City of South Gate traffic analysis procedures and thresholds of significance. Refer to Figure 1 of the Supplemental Analysis for the location of each of these intersections.

Such additional analysis is not grounds for recirculation. (See *Merced Alliance for Responsible Growth v. City of Merced* (2012 WL 5984917) (*Merced Alliance for Responsible Growth v. City of Merced*, 2012).¹ The Court in *Merced Alliance* concluded that recirculation was not required when the public agency provided additional traffic analysis requested by the commenter. In *Merced*, petitioners alleged that "...the city's late-submitted information on traffic impacts triggered the requirement that the EIR be recirculated." (Slip Opinion at 65.) "[The Lead Agency] prepared a response that explained in detail why the methodologies used in its traffic study were sound. In addition, to allay [Plaintiff's] concern, [the Lead Agencies' consultants] conducted an analysis of the study intersections using the baseline [Plaintiffs] suggested - the existing condition plus project-generated trips. This analysis showed that 'there would be no new findings compared to the DEIR traffic analysis.' The challengers argue that, because the respondents cited [the Lead Agency's] analysis to defend the EIR before the superior court, this must have been significant new information that required recirculation. Once again, their recirculation argument fails. The [lead agency's] response letter and new analysis did not disclose a new significant impact, increase the severity of an impact, identify a feasible project alternative or mitigation measure, or 'deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect...'. [Laurel Heights II, supra, 6 Cal.4th at p. 1129.] The letter and analysis were prepared to respond to [Plaintiff's] concerns, not to change any aspect of the project, mitigation measures, or findings and conclusions in the EIR." (Slip Opinion at 77-78.)

The comment does not provide supporting data or further elaboration to support the assertion that "...[t]he Draft EIR understated or ignored many of the proposed project's impacts and completely fails in the identification of effective mitigation for a number of key issue areas."

Response No. B5-3

This comment states that the trip generation was underestimated for the Project. Furthermore, the comment states that the Draft EIR did not discuss cumulative impacts from nearby related projects that are already approved or being planned.

For clarification, the comment cites an incorrect number of employees expected to work on the Project Site. While the descriptions of each individual department provided within subsection 2.4.2, *Proposed Project*, cite a maximum number of employees on the Project Site that would be over 3,000 employees, as described on page 2-19 of Chapter 2, *Project Description*, of the Draft EIR, the Project proposes to accommodate 3,000 employees on the Project Site, not "more than 3,500 employees" as stated in the comment. The trip generation forecast provided in Table 3.11-5 shows that 3,000 employees were used in the trip generation forecast, which led to the Project's trip generation forecast of 7,443 daily trips.

¹ <https://www.courts.ca.gov/opinions/nonpub/F062602.PDF>

The commenter also incorrectly faults the EIR for utilizing trip generation rates for “general office” as opposed to “governmental offices.” “General Office” rates were utilized instead of governmental office uses, or Government Office Buildings as provided in the *Trip Generation Manual* published by the ITE, because the Project consists primarily of administrative office uses rather than public-serving facilities. Public-serving facilities typically include uses such as City Halls or Department of Motor Vehicles, which have considerable visitor traffic and, therefore, result in greater trip generation.

Furthermore, the Draft EIR made conservative assumptions regarding the Project’s trip generation, which are ignored in the comment. As discussed in Section 7.1, *Project Traffic Generation*, of the Traffic Impact Study, as provided in Appendix H of the Draft EIR, the Project utilized the ITE trip generation rate 710 (General Office Building), and then adjusted those numbers upwards by 63 percent in the AM and 31 percent in the PM, thus ensuring “a conservative (‘worst case’) assessment of potential traffic impacts due to the Project.” The ITE trip rates utilize the Project’s proposed developed floor area (650,000 square feet) as the independent variable, which would result in a forecast of 637 AM peak hour vehicle trips and 674 PM peak hour trips. These floor-area based forecasts would result in fewer vehicle trips as compared to the forecasts based on the proposed number of employees (3,000 employees), which would result in 1,038 AM peak hour trips and 884 PM peak hour trips. Los Angeles County Department of Public Works (LACDPW) Traffic and Lighting Division staff directed that the forecasts using the employee-based trip rates be utilized so as to provide a conservative (“worst case”) assessment of the potential traffic impacts due to the Project.

As further discussed on page 3.11-13 of Section 3.11, *Transportation*, of the Draft EIR, while these vehicle trips would represent trips being made by existing employees that are being relocated from the other County facilities, the analysis conservatively assumed that all of these trips are new trips, rather than redistributed existing trips. (3) Additionally, the analysis assumed that the Project’s trip generation would occur during the AM and PM Peak commuter hours, however as noted on page 2-20 of the Draft EIR, most employees in the proposed County ISD building (with up to 2,450 employees) would work a shift between 6:00 AM and 6:00 PM on weekdays. This would result in most employee traffic arriving prior to the AM commuter peak period beginning at 7:00 AM and departing after the end of the PM commuter peak period ending at 6:00 PM. (4) Finally, while the Project Site is well-served by public transit services, the trip generation estimates took no reductions for potential trips that would be made by public transit, bicycling or other modes in lieu of private automobiles, thus ensuring that the traffic analysis was conservative.

The comment also incorrectly asserts that the traffic analysis provided in the Draft EIR did not consider cumulative traffic impacts due to buildout of related development projects. While this comment is fairly general, more specific comments about the cumulative analysis occur in later portions of this comment letter. Therefore, a robust response to comments about the cumulative analysis is provided here to allow the reader and decisionmakers a single location to understand the approach to the cumulative analysis and is incorporated in the other responses addressing the cumulative impact analysis below.

The traffic analysis uses a “Future with Project²” scenario that includes both a specific list of 31 reasonably foreseeable related projects (i.e., cumulative projects). This approach is considered highly conservative, because a cumulative analysis can rely upon either a list of projects approach or a growth projections approach. (CEQA Guidelines Section 15130(b)(1); *South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 336.) As stated on page 3 of the Traffic Impact Study (provided as Appendix H to the Draft EIR), the cumulative projects were selected because they are located: (1) immediately adjacent or in close proximity to the Project Site; (2) in the vicinity of the Project Site and are documented to have current or projected future operational issues; and/or (3) in the vicinity of the Project Site and are forecast to experience a relatively greater percentage of Project-related vehicular turning movements (e.g., at freeway ramp intersections). The cumulative projects used in the traffic analysis are provided in Table 6-1 of the Traffic Impact Study, and include projects located in the cities of South Gate, Downey, and Paramount, as well as a regional project and other projects on the Rancho Los Amigos Campus (including North and South Campuses).

The list of cumulative projects considered in the Draft EIR (Table 2-8 of the Draft EIR), and the list of cumulative projects considered in the traffic analysis (Table 6-1 of the Traffic Impact Study) were specifically determined as a result of focused inquiries with surrounding jurisdictions (including the City of South Gate³).

In terms of the traffic analysis, the Future with Project analysis also includes an ambient annual growth factor of 1.0 percent that is attributed to overall regional growth both inside and outside of the transportation study area, which accounts for projects that were not known, and could not be known, when this analysis was prepared. As described on page 32 of the Traffic Impact Study, provided in Appendix H of the Draft EIR, the annual growth factor of 1.0 percent annual growth provides a conservative, worst-case forecast of future traffic volumes in the area, which exceeds the 0.61 percent growth factor provided in the Los Angeles County Congestion Management Program (CMP) manual for the Project study area. (See *City of Maywood v. Los Angeles Unified School District* (2012) 208 Cal.App.4th 362, 424 [Upholding cumulative traffic analysis based upon CMP growth factor].)

Table 3.11-8 in the Draft EIR summarizes the intersection levels of service for the Future with Project conditions, which includes the estimated traffic associated with the 31 analyzed cumulative projects and the ambient annual growth factor of 1.0 percent. This information, as compared to the Future without Project conditions, is used to evaluate the cumulative traffic impacts associated with the Project. Therefore, cumulative impacts from nearby cumulative

² Section 3.11, *Transportation*, and Appendix H, Traffic Impact Study, of the Draft EIT interchangeably uses the terms Future with Project and Future Cumulative with Project. Similarly, in the same documents, the terms Future without Project, Future Cumulative without Project, and Future Baseline are also all used interchangeably.

³ The preparers of the Traffic Impact Study, LLG, corresponded with staff from the City of South Gate (Alvaro Betancourt) in September 2017 regarding cumulative projects to consider in the traffic analysis. The City of South Gate provided the list of cumulative projects in an email correspondence dated September 13, 2017, and all cumulative projects identified in this correspondence were included in the cumulative impact analysis. Further, when contacted again by LLG in February 2019 to inquire about any updates to the list of related projects, neither the City of Downey nor the City of South Gate provided any additional information.

projects, including those either planned, under environmental review, approved, or under construction, as well as an annual growth factor, were evaluated in the Draft EIR.

There are two cumulative projects identified in Table 2-8 of Chapter 2, *Project Description*, of the Draft EIR that are qualitatively analyzed in the majority of sections in the Draft EIR, but were not used in the traffic analysis or those analyses that rely on future traffic volumes, including air quality, greenhouse gas emissions, and noise. These include the West Santa Ana Branch Transit Corridor Project (WSAB Transit Corridor Project) and the City of Downey Specific Plan Update.

The WSAB Transit Corridor Project is a proposed 19-mile light rail transit line that would connect downtown Los Angeles with southeast Los Angeles County (Metro, 2019). Metro is currently preparing an Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) for the WSAB Transit Corridor Project, including the evaluation of a potential station located adjacent to Gardendale Street, in the southwest portion of the City of Downey's Specific Plan Update area. Release of the EIS/EIR is anticipated to occur sometime in 2020.

As part of the WSAB Transit Corridor Project, Metro prepared a Transit Oriented Development (TOD) Strategic Implementation Plan to unify the land use and economic development strategies for the 14 communities located along the Transit Corridor and to provide a toolkit of strategies for land use, active transportation and economic development for these communities based on a shared vision for the WSAB Corridor (Metro, 2019). Preparation of the TOD Strategic Implementation Plan became final in May 2019, after the Notice of Preparation for this Project was issued in August 2017. As the TOD Strategic Implementation Plan indicates, the City of Downey's Specific Plan Update (referred to as the Rancho Los Amigos South Campus Specific Plan throughout this Final EIR) is still in preparation (i.e., it has not yet been made publically available, nor has its accompanying EIR).

Development of a TOD by the new Gardendale Station under the WSAB Transit Corridor Project may occur in the future, but is considered speculative at this time. Current plans for the WSAB Transit Corridor show delivery in 2041 (with potential acceleration from a Public Private Partnership), with TOD projects likely occurring after that time. More specifically, no specific plans have been developed for the Gardendale Station. Therefore, uses that would be developed near the Gardendale Station are undetermined at this time and would be considered speculative to assume in a cumulative traffic analysis for this Project. Furthermore, the WSAB Transit Corridor Project would reduce the project's trip generation rate in comparison to the conservative rates analyzed in the Draft EIR.

Neither the WSAB Transit Corridor Project (or the associated TOD Strategic Implementation Plan) are a consequence of the proposed Project; both would be developed separately with separate environmental review; and implementation is contingent on future events outside of the control of the County of Los Angeles. For the foregoing reasons, the WSAB Transit Corridor Project was not used in the traffic analysis or those analyses that rely on future traffic volumes, including air quality, greenhouse gas emissions, and noise. Furthermore, transit projects and transit-oriented development patterns are identified as ways to reduce regional air pollutants and greenhouse gas emissions, and consideration of those projects in the analysis would reduce

cumulative impacts. Legislative findings in SB 743 plainly state that CEQA “can no longer treat vibrant communities, transit, and active transportation options as adverse environmental outcomes.” Similarly, the state has implemented a number of policies to encourage development in proximity to transit and to foster additional transit use to reduce environmental impacts. (SB 375; see also the SCAG 2016 RTP/SCS, which includes expanding access to transit.)

The City of Downey Specific Plan Update (or Rancho Los Amigos South Campus Specific Plan) and its EIR are still under preparation, and began after the preparation of the County’s Rancho Los Amigos project, for which an NOP was issued in August of 2017. The City’s South Campus Specific Plan seeks to update the previous (Rancho Business Center Specific Plan 88-1) Specific Plan for South Campus area (City of Downey, 1989). While a Notice of Preparation was issued for the Rancho Los Amigos South Campus Specific Plan in February 2019, a land use program was not included in the notice (City of Downey, 2019). Instead, it provides general goals of the Specific Plan Update, such as to encourage and promote economic development and revitalization to enhance the City of Downey’s attractiveness to the local and regional marketplace; remove regulatory obstacles to the reuse of existing structures and promote infill development of currently vacant and underutilized properties; and facilitate and encourage enhanced commercial, retail, and mixed-use opportunities, residential development, public and open spaces, an improved pedestrian environment, and a variety of transportation choices that will enhance the potential for a multi-modal transportation center.

As illustrated by Exhibit 2 of the Notice of Preparation for the City’s Rancho Los Amigos South Campus Specific Plan, the Specific Plan’s boundaries include the Project Site, as well as the WSAB Transit Corridor’s Gardendale Station. Therefore, it is assumed that the Rancho Los Amigos South Campus Specific Plan would address development proposed by this Project, which accounts for about one-third of the Specific Plan area, as well development associated with the Gardendale Station.

The proposed Project evaluated in the Draft EIR considers development on a 35-acre site (referred to as the “Development Area”). For purposes of this Draft EIR, the South Campus is defined as a 74-acre site (referred to as the “Project Site”); however, there are currently no other planned or foreseeable County projects or other proposed private development activities where applications have been submitted for the remaining available 39-acres of the 74-acre Project Site, excluding the approximately 35-acre Development Area for the proposed Project and the 5-acres for the Sports Center project. Conversely, the Project site considered in the Rancho Los Amigos South Campus Specific Plan, which is currently in preparation, evaluates a considerably larger area, totaling approximately 172 acres, as indicated in the Notice of Preparation. Development within the Specific Plan site will be guided by the goals previously described, with a more specific land use program provided in the Specific Plan Update, when it is completed, and evaluated in its EIR. This EIR does not consider the 1988 Specific Plan as a cumulative project in this EIR because it proposed phasing out the existing hospital and administrative uses, which is not occurring, and replacing them with light industrial uses with a central open space area, which is also not consistent with the proposed Specific Plan Update’s goals.

Further, while development of the remaining portions of the South Campus is expected to occur, given the timing of development of the Specific Plan and Specific Plan EIR, and the effects the WSAB Transit Corridor Project will have on how the site is ultimately developed, it is not reasonable to assume that any development in the Specific Plan area would occur before the Project as analyzed in the Draft EIR is implemented. It is also reasonable to assume that the Specific Plan EIR will provide the cumulative analysis that considers this Project, which has a defined development program; development at the Gardendale Station; and development of the rest of the South Campus consistent with the land use program that will be provided in the Specific Plan. In summary, because uses that would be developed in the Specific Plan area were undetermined at the time the NOP and the Draft EIR for the County's Project were released (and are still undetermined at the time of the Final EIR), it would be speculative to assume the City's Rancho Los Amigos South Campus Specific Plan in a cumulative traffic analysis for this Project. Further, the Specific Plan project is not a consequence of the proposed Project; it would be developed separately with its own environmental review. The final implementation of the City's Specific Plan is contingent on future events outside of the control of the County of Los Angeles.

A "... revised and recirculated EIR ..." requested in the comment is not necessary because the Draft EIR adequately analyzes and discloses the impacts of the Project, including cumulative impacts. In responding to all comments received on the Draft EIR, including this one, the Lead Agency has not identified "new significant information," such as new significant environmental impacts or a substantial increase in the severity of environmental impacts pursuant to CEQA Guidelines Section 15088.5 that would give rise to the need for recirculation of the Draft EIR.

Response No. B5-4

This comment also serves as an introduction to the remainder of the letter, similar to Comment No. B5-1. Detailed responses to reach of the comments in this letter are provided in Responses to Comment Nos. B5-5 through B5-100.

Response No. B5-5

The comment states that the Lead Agency failed to consider all comments provided by local residents regarding the proposed Project's potential environmental impacts. The comment further states that the Draft EIR did not provide a comprehensive listing of the concerns from the local residents and did not address fire services in the Draft EIR. The comment goes on to state that the significant concerns raised by the City of South Gate and local residents involved traffic impacts.

The comments submitted in response to the Notice of Preparation (NOP) for this Project are provided in Appendix A of the Draft EIR. This includes specific comment letter received by all commenters (the City of South Gate did not submit any NOP comments) (Appendix A-2) and a transcription of comments made at the NOP Scoping Meeting (Appendix A-3). As the comment states, a number of these comments are from local residents and the City of South Gate, with several comments addressing potential traffic impacts. Consequently, and contrary to the allegations in the comment, the Draft EIR provided a verbatim and comprehensive listing of their NOP concerns.

The comment goes on to assert that the "... Lead Agency failed to seriously consider all of the [scoping] comments ...". However, the comment does not provide detail or a listing of the specific comments that it contends were not considered in the Draft EIR. Further, CEQA does not require that the Draft EIR provide a comprehensive listing of each comment submitted in response to the issuance of the NOP or where those comments were addressed in the Draft EIR; however, consistent with CEQA Guidelines Section 15375, the Draft EIR considered each NOP comment to determine the scope and content of the environmental information included in the Draft EIR.

The analysis of potential transportation and traffic impacts related to the Project is provided in Section 3.11, *Transportation*, of the Draft EIR. Section 3.11 was prepared based on information provided in the Project's Traffic Impact Study contained in Appendix H of the Draft EIR. The comment does not state specifically how the traffic analysis fails to address comments submitted in response to the issuance of the NOP; therefore, no further specific response can be provided.

The comment also alleges that NOP public comments on fire service concerns were not addressed in the Draft EIR (the City of South Gate did not submit a comment letter on the NOP). The issue of emergency access for purposes of firefighting and public safety at the Project Site is discussed in Section 5.4.5, *Public Services*, in the Draft EIR. On page 3.11-32, the Draft EIR states that emergency access to the Project Site is available from all major roadways leading to and within the Development Area. The Draft EIR finds the proposed Project will not result in inadequate emergency access and impacts would be less than significant. To the extent the commenter is referencing public NOP comments requesting that the County construct a new Fire Station for the City of South Gate on the project site, such a suggestion would not reduce or avoid an environmental impact, would not accomplish the Project Objectives, and the EIR analyzed a reasonable range of alternatives.

Response No. B5-6

This comment states that the location of the Project Site is unclear. The Project location is properly defined within Chapter 2, *Project Description*, of the Draft EIR, which clearly delineates the differences in terminology when describing the Project Site versus the Development Area. As stated on page 2-18 and shown in Table 2-3, the full build-out of the proposed Project would encompass up to 650,000 square feet of developed floor area within the approximately 35-acre Development Area portion of the larger 74-acre Project Site. No development is proposed in the remaining 39 acres of the Project Site. As stated on page 2-29, remedial excavation would occur on the Project Site, immediately south of the Development Area. Figure 2-2 graphically depicts the geographic extent of the Project terminology (Project Site and Development Area). The commenter is correct that the remediation, building demolition, and infrastructure would be required to accommodate new buildings and parking structures. The use of this terminology is consistently described throughout the EIR, and no revisions are necessary.

Response No. B5-7

The comment indicates that MTA's proposed Gardendale Station is an important cumulative project given its proximity to the Project site.

Refer to Response to Comment No. B5-3 for a discussion of the approach to the cumulative analysis, including the WSAB Transit Corridor Project, which includes the Gardendale Station. Refer also to Response to Comment No. B5-21 for a discussion of probable future projects included in the cumulative impact analysis.

Response No. B5-8

The comment states that the description of the number of buildings, structures, and features that have LACO Numbers is confusing. As stated in the comment and on page 2-4, the Project Site contains 107 buildings and structures that have assigned LACO Numbers. In addition to the 107 buildings and structures, there are two additional features on the Project Site that do not constitute buildings or structures: the Moreton Bay Fig Tree and the *Rancho Los Amigos Site Plan*.⁴ Therefore, there are a total of 109 buildings, structures, and features considered as part of the analysis in the Draft EIR.

Response No. B5-9

The comment references the “City of Downey’s Specific Plan,” which is assumed to refer to the Rancho Los Amigos South Campus Specific Plan that is currently under preparation by the City of Downey. The comment also refers to the City’s 1985 Rancho Los Amigos Specific Plan, which generally includes the South Campus area. As mentioned in Response to Comment No. B5-3, there was a 1988 Specific Plan that also generally included the South Campus (the Rancho Business Park Specific Plan). Neither the 1985 nor 1988 Specific Plans provide relevant and current planning goals and, therefore, are not utilized in the cumulative environmental analyses, given that the City is currently preparing the Rancho Los Amigos South Campus Specific Plan. Refer to Response to Comment No. B5-3 for a thorough discussion of the status of future development in the South Campus area.

Response No. B5-10

This comment requests environmental analysis to support the findings for the Sports Center project CEQA exemption. The Sports Center project is separate from the Project, which was approved by the County Board of Supervisors in November 2016. An analysis was provided at that time in a Memorandum for the Record (MFR) that demonstrated that the Sport Center project was consistent with the provisions of Class 32, “In-fill Development Projects” and that the proposed in-fill development project meets the conditions described in CEQA Guidelines Section 15332(c). Specifically, the County found that the Sports Center project would not result in significant effects related to air quality, noise, traffic or water quality, and that the Sports Center project is adequately served by utilities and public services. A Notice of Exemption for the Sports Center project was adopted on November 22, 2016 by the County of Los Angeles.⁵

⁴ The Rancho Los Amigos Site Plan is a contributing feature that includes the District’s circulation paths, landscaping, and spatial relationships between the contributing buildings. A “feature” is an historic architectural resources, along with buildings, structures, and objects.

⁵ The NOE is provided at: <ftp://dpwftp.co.la.ca.us/pub/pmd/RLASCSportsCntr/>.

The comment also requests that the location and extent of cumulative projects be accurately identified. Refer to Responses to Comment Nos. B5-3 and B5-21 for a detailed discussion of the approach to the cumulative analysis and the list of related projects, including the WSAB Transit Corridor Project, the Sports Center project, and the City of Downey's Rancho Los Amigos Specific Plan. The list of cumulative projects considered in the Draft EIR are provided in Table 2-8 in Section 2, *Project Description*, of the Draft EIR.

Response No. B5-11

As stated on page 2-33 of Chapter 2, *Project Description*, of the Draft EIR, the portion of the Project Site that would not be developed would remain as open space until such time future development is proposed and approved. As further stated on page 2-46, there are currently no other planned or foreseeable County projects or other proposed private development activities where applications have been submitted for the remaining available 39-acres of the 74-acre Rancho Los Amigos South Campus, excluding the 35-acre Development Area for the proposed Project and the 5-acres for the separate previously approved Sports Center project.⁶ Refer to Responses to Comment Nos. B5-3 and B5-21 for a discussion of the approach to the cumulative analysis and the list of cumulative projects, including the WSAB Transit Corridor Project and the City of Downey's Rancho Los Amigos Specific Plan. With respect to the commenter's request for a recirculated Draft EIR, refer to Responses to Comment Nos. B5-3 and B5-46 for a discussion of why recirculation is not necessary.

Response No. B5-12

This comment states that cumulative employment would increase based on the new development adjacent to the South Campus and that this potential new development must be identified and analyzed in a recirculated Draft EIR. The cumulative analysis considers a number of specific projects and if they were employment generators, those were considered in the analysis; however, as stated on page 2-46 of Chapter 2, *Project Description*, of the Draft EIR, "there are currently no other planned or foreseeable County projects or other proposed private development activities where applications have been submitted, for the remaining available 39-acres of the 74-acre area of the Rancho Los Amigos South Campus." In addition, the Future with Project traffic analysis also includes an ambient annual growth factor of 1.0 percent that is attributed to overall regional growth both inside and outside of the transportation study area, which accounts for projects that were not known, and could not be known, when this analysis was prepared (that is, projects where applications were not yet submitted when the cumulative analysis was prepared).

Refer to Responses to Comment Nos. B5-3 and B5-21 for a discussion of the approach to the cumulative analysis and the list of cumulative projects, including the WSAB Transit Corridor Project and the City of Downey's Rancho Los Amigos Specific Plan.

⁶ The South Campus area that will be evaluated in the City of Downey's Rancho Los Amigos South Campus Specific Plan is approximately 172 acres, which is a larger area than the "South Campus" area evaluated in this EIR.

Response No. B5-13

The comment states that the Project will employ over 2,700 persons and generate approximately 7,000 vehicle trips on a daily basis. However, the commenter also indicates the 3,500 employees would be generated in Comment B5-3. As a point of clarification, and as stated in Response to Comment No. B5-3, the Project proposes to accommodate 3,000 employees on the Project Site, which led to the Project's trip generation forecast of 7,443 daily trips. The commenter is correct in that all employees and vehicle trips will be generated by land uses and development located within the Development Area. It is currently unknown what development might occur on the remaining available 39-acres of the 74-acre area of the Rancho Los Amigos South Campus, and any estimate of future development would be purely speculative (refer also to Responses to Comments Nos. B5-3, B5-12, and B5-13). With respect to the commenter's request for a recirculated Draft EIR, refer to Responses to Comment Nos. B5-3 and B5-46 for a discussion of why recirculation is not necessary.

Response No. B5-14

This comment indicates concerns regarding the level of specificity provided in Draft EIR regarding the proposed new development. Specifically, the comment states the number of buildings and their height varies within the Draft EIR.

Maximum building heights are summarized in Table 2-3 of Chapter 2, *Project Description*, of the Draft EIR. While the maximum building heights for each building may vary (e.g., ISD, Probation, County Office, and Parking Structures), the Draft EIR consistently refers to the maximum building height for each building. Further, as stated on page 2-4 of Chapter 2, *Project Description*, of the Draft EIR and as consistently stated throughout the Draft EIR, there are 107 buildings and structures on the Project Site (refer also to Figure 2-3 of the Draft EIR). However, there are two other features on the Project Site, including a Moreton Bay Fig Tree and the Rancho Los Amigos Site Plan, resulting in 109 total building, structures, and features on the Project Site.

As indicated in Section 2.4.1, *Project Overview and Design Build Process*, the Project will be executed through a "design build" contractor, who would be selected when and if the Project is approved. As stated on page 2-18, design-build contracting is a process in which both the design and the construction of a project are procured from a single entity and which allows for a collaborative approach that can result in reduced costs and improved design quality. The Draft EIR evaluates the full potential build out of the County's proposed uses for purposes of identifying the maximum extent of impacts. The information provided in the Project Description is stable and finite and at a sufficient level of detail to meaningfully analyze and disclose the maximum environmental impacts that could occur. The Draft EIR's evaluation of the environmental effects of the Project is consistent with CEQA Guidelines Section 15151, which states that an EIR's sufficiency is analyzed based on what is reasonably foreseeable. In *Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26, the court noted that the CEQA Guidelines require a "general description" of a project's characteristics; this requirement means that the EIR must describe the main features of a project and other information needed for an assessment of the project's environmental impacts. As long as these requirements are met, a

project description may allow for the flexibility needed to respond to unforeseeable events and changing conditions that could affect the project's final design. (*Citizens for a Sustainable Treasure Island v. City & County of San Francisco* (2014) 227 Cal.App.4th 1035, 1053.) The Project Description is clear and allows for meaningful review of the development.

This comment also states that the Draft EIR has a lack of clarity regarding parking structures and surface parking lots. As stated on page 2-26 of Chapter 2, *Project Description*, of the Draft EIR, the parking for the Project would be provided by the ISD/Probation Parking Structure and County Office Parking Structure. No surface parking would be provided; therefore, "surface parking" in the third paragraph under the *Parking* subheading will be removed from the Draft EIR. This revision to page 2-26 of the Draft EIR is shown below and is included in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of this Final EIR.

A minimum of six percent of the required parking spaces would be designated as electric vehicle charging stations for ~~both the surface parking and the~~ parking garages. Eight percent of the required parking spaces shall be assigned to low emitting, fuel efficient, carpool/van pool vehicles.

This revision merely clarifies that surface parking would not be provided, but does not change the total number of parking spaces that would be provided. In fact, the total number of parking spaces would exceed the County's requirement of one parking space per 400 square feet of business and professional office uses (i.e., 1,625 spaces would be required and 2,692 spaces would be provided). This clarification to the Draft EIR does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it.

The comment also states that without a refined site plan, it is difficult to evaluate onsite circulation and parking. Pages 2-25 and 2-26 of Chapter 2, *Project Description*, of the Draft EIR provide details about the access to the Project Site and circulation within the Project Site. Additionally, pages 3.11-30 and 3.11-31 of Section 3.11, *Transportation*, provides analysis of circulation and access from all roadways internal to the Project Site. Refer to Response to Comment No. B5-46 for the detailed discussion on circulation and access.

Response No. B5-15

This comment states that the Draft EIR needs to consider potential future development on the remainder of the South Campus outside of the Development Area and raises a concern regarding deferring a detailed analysis until some future time. Refer to Responses to Comment Nos. B5-3 and B5-21 for a discussion of the approach to the cumulative analysis and the list of cumulative projects, including the WSAB Transit Corridor Project and the City of Downey's Rancho Los Amigos Specific Plan. It is currently unknown how much development, if any, would occur on

the remaining available 39-acres of the 74-acre area of the Rancho Los Amigos South Campus, and any estimate of future development would be purely speculative.

Response No. B5-16

This comment states that the inclusion of electric vehicle (EV) charging stations should be identified as a mitigation measure in the air quality, greenhouse gas (GHG) emissions, and traffic analyses. The CALGreen Code requires inclusion of EV parking and, the Project will comply with that requirement, as discussed on page 3.5-3 under Section 3.5.2, *Regulatory Framework*, of Section 3.5, *Energy*, of the Draft EIR. Therefore, it is appropriate to assume EV parking spaces would be provided as part of the Project, rather than a mitigation measure, for purposes of analyzing air quality and greenhouse gas emissions.

Response No. B5-17

This comment states that the transport of the contaminated soil would require approximately 550 trucks (or more than 1,000 trip ends) and that particulate and NO_x emissions from these trucks and other equipment should be analyzed as part of the Draft EIR.

Truck trips for soil remediation were considered in the construction haul trip assumptions for the air quality analysis. The anticipated 5,333 cubic yards (CY) of contaminated soil export would result in approximately 444 total trucks or 888 total one-way haul truck trips (refer to page 2-29 in Chapter 2, *Project Description*, of the Draft EIR for the cubic yards of soil export and Appendix B, *Air Quality Emissions Calculations*, of the Draft EIR for the truck trips). The Draft EIR provides a conservative analysis, as truck trips for 1,055 CY of soil import for remediation was also included in the soil remediation phase for an additional 88 trucks or 176 one-way haul truck trips (refer to Appendix B, *Air Quality Emissions Calculations*, of the Draft EIR).

As analyzed within the Project's Traffic Impact Study, provided in Appendix H of the Draft EIR, two phases would result in the highest amount of trips: (1) the shoring/excavation phase would result in the highest number of truck trips, and (2) the building construction phase would generate the highest number of workers on the Project Site. The Traffic Impact Study assumes a total of 226 one-way trips per day. Appendix B, *Air Quality Emissions Calculations*, of the Draft EIR assumes 72 one-way trips per day for import and export activities and 154 one-way trips per day for grading activities. It is likely that these activities would not entirely overlap; however, if they did, the truck trips assumed in the air quality analysis (226 one-way trips per day) would equal what is assumed in the traffic analysis (226 one-way trips per day), presenting a conservative analysis. If the phases are sequential, which is likely given that site demolition, soil export, soil import, grading, and/or site preparation do not occur at the same time, the Traffic Impact Study, and the noise and air quality analysis would overstate impacts because such impacts would be spread out over more days than assumed in the EIR. Thus, the amount of truck trips needed during the remediation process would likely be less than what was analyzed for trip generation and air quality emissions in the Draft EIR. Truck trips associated with soil import and export were evaluated in Section 3.2, *Air Quality*, of the Draft EIR.

With respect to the commenter's request for a recirculated Draft EIR, refer to Responses to Comment Nos. B5-3 and B5-46 for a discussion of why recirculation is not necessary.

Response No. B5-18

This comment requests the estimates of the quantities of imported soils that would be required to backfill the excavated areas and indicates that groundwater would be encountered at the base of remedial excavation. The commenter correctly notes that groundwater would be encountered, consistent with what is stated on pages 3.8-3 through 3.8-4 of Section 3.8, *Hydrology and Water Quality*, and analyzed in HYDRO-1, provided on pages 3.8-21 through 3.8-25 of the Draft EIR.

The air quality analysis is based on a total of 4,278 CY of imported soils for backfill during the grading/excavation phase of construction (refer to Appendix B, Air Quality Emissions Calculations, of the Draft EIR). This quantity, plus the 1,055 CY of soil import during the soil remediation phase (refer also to Appendix B, Air Quality Emissions Calculations, of the Draft EIR), totaling 5,333 CY of soil import, balances the contaminated soil export of 5,333 CY mentioned in Response to Comment No. B5-17.

The traffic analysis assumes a total of 226 one-way construction-related truck trips per day. Appendix B, Air Quality Emissions Calculations, of the Draft EIR assumes 72 one-way trips per day for import and export activities and 154 one-way trips per day for grading activities. It is likely that these activities would not entirely overlap; however, if they did, the truck trips assumed in the air quality analysis (226 one-way trips per day) would equal what is assumed in the traffic analysis (226 one-way trips per day), presenting a conservative analysis. If the construction phases are sequential, which is likely, the Traffic Impact Study, and, therefore, both the noise and air quality analysis, would overstate impacts because such impacts would be spread out over more days than assumed in the Draft EIR.

Response No. B5-19

This comment states that the potential development on the remainder of the South Campus should be identified and also states that an NOP was circulated by the City of Downey for the South Campus, but is not mentioned in the Draft EIR. The commenter is referring to the NOP for an EIR for the City of Downey Specific Plan Update (also referred to as the Rancho Los Amigos South Campus Specific Plan), which is identified as cumulative project number 5 in Table 2-8 of Chapter 2, *Project Description*, of the Draft EIR. It is currently unknown how much development, if any, would occur on the remaining available 39-acres of the 74-acre area of the Rancho Los Amigos South Campus, and any estimate of future development would be purely speculative.

Refer also to Responses to Comment Nos. B5-3 and B5-21 for a discussion of the approach to the cumulative analysis and the list of related projects, including the WSAB Transit Corridor Project and the City of Downey's Rancho Los Amigos Specific Plan.

Response No. B5-20

This comment states that the City of South Gate is not included within the geographic scope of the cumulative impact analysis as reflected by Table 2-6, Geographic Scope of Cumulative Impact Analysis, of Chapter 2, *Project Description*. Table 2-6 of the Draft EIR lists resource issues and the geographic area associated with each issue, which explicitly lists the City of South Gate. Additionally, projects within the City of South Gate are included within the geographic scope of the areas listed in the table. For example, the geographic areas of the County of Los Angeles or the South Coast Air Basin includes the City of South Gate.

As Table 2-6 shows, the following resource issues have geographic scopes that include the City of South Gate: (1) agricultural resources, which includes Los Angeles County as the geographic scope; (2) air quality, which includes the South Coast Air Basin as the geographic scope; (3) biological resources, which includes the cities of Downey, South Gate, Lynwood, and Paramount as the geographic scope; (4) historical resources, which includes Los Angeles County as the geographic scope; (5) archaeological and human remains, which includes the traditional use area of the Gabrielino as the geographic scope; (6) paleontological resources, which includes the Los Angeles Basin as the geographic scope; (7) energy resources; which includes the service area of So Cal Edison and SoCalGas as the geographic scope; (8) GHG emissions, which is a global phenomenon; (9) land use and planning, which includes Los Angeles County and the City of Downey as the geographic scope; (10) noise, which includes a 500-foot radius around the Project Site as the geographic scope, which includes the City of South Gate; and (11) transportation and traffic, which includes the cities of Downey, South Gate, Lynwood, and Paramount as the geographic scope. Additionally, three cumulative projects within the City of South Gate are identified within Table 2-8 that could potentially result in cumulative impacts in the Draft EIR.

Response No. B5-21

This comment provides descriptions regarding three cumulative projects that are identified in Table 2-8. The additional information provided in the comment include updated dates of releases for environmental documentation and estimated construction start dates. However, these updates do not affect the cumulative analysis done for these projects in the Draft EIR.

The comment states that the Draft EIR does not include a “meaningful analysis of the cumulative environmental impacts of these critical related projects together with those of the proposed project.” However, Section 3.1.6 of Section 3.1, *Aesthetics*, of the Draft EIR presents a meaningful analysis of the cumulative effects of the proposed Project in combination with other past, present, and reasonably foreseeable future projects that could cause cumulatively considerable impacts. Furthermore, comment does not identify what analysis is missing that could provide a more “meaningful” analysis the commenter requests. Chapter 3, *Environmental Impact Analysis*, of the Draft EIR provides a cumulative impact analysis for every resource section which includes the projects discussed in the comment, except for the traffic analysis. Refer to Response to Comment No. B5-3 for a discussion of the cumulative projects used in the traffic analysis and

why the WSAB Transit Corridor project and City of Downey Rancho Los Amigos Specific Plan were not included in the traffic analysis.

This comment also mentions two cumulative projects within the City of South Gate that were not included within the cumulative analysis: the Former American Legion Site and the Tweedy & Atlantic Site. The County entered into an Exclusive Negotiation Agreement with Abode Communities and PATH Ventures on September 24, 2019, just two weeks before release of this Draft EIR, to discuss the potential terms of the development of a 100-unit affordable housing project on the County-owned Former American Legion Site property located at 11269 Garfield Avenue in the City of Downey (City of South Gate, 2019b). The project located on the Tweedy & Atlantic Site, a 3.84 site located at 9323 Atlantic Avenue in the City of South Gate, would develop 91 residential apartment units and approximately 39,482 square feet of commercial uses (Denley Investment & Management Company, 2018).

These projects (American Legion and Tweedy & Atlantic) would generate limited vehicle trips because the sites are relatively small (2.2 acres and 3.8 acres, respectively). Further, development at the sites is relatively limited, consisting of 100 affordable housing units at the American Legion site and approximately 40,000 square feet of commercial uses and 91 residential apartment uses at the Tweedy & Atlantic site. The American Legion project, located approximately one mile from the Project Site, would be forecast to generate approximately 52 AM peak hour trips and 38 PM peak hour trips. When compared to the total forecast of vehicle trips for the cumulative projects provided in Table 6-1 of the Traffic Impact Study (470 total AM peak hour trips and 748 total PM peak hour trips), the American Legion project would increase the total AM peak hour trips by 11 percent and the total PM peak hour trips by 5 percent. The Tweedy/Atlantic site is located approximately 3 miles from the Project Site. The County's traffic study guidelines document only requires analysis of related projects located within 1.5 miles of the Project Site. However, if these sites are ultimately developed, irrespective of distance from the Project site, any vehicle trips that may be experienced at the study intersections would be captured within the use of the annual ambient growth factor applied to the existing traffic counts. As described on page 32 of the Traffic Impact Study, as well as on page 3.11-14 of Section 3.11, *Transportation*, of the Draft EIR, the inclusion of the ambient traffic factor is intended to account for potential future traffic growth related to development projects not identified in the list of cumulative projects. Also, the City of Downey and the City of South Gate did not identify these projects as reasonably foreseeable future projects when asked by the County in September 2017 when the Draft EIR was being prepared. Further, when contacted again by Linscott, Law, & Greenspan (LLG) in February 2019 to inquire about any updates to the list of related projects, neither the City of Downey nor the City of South Gate provided any additional information.

Refer to Responses to Comment Nos. B5-3 and B5-63 for a detailed discussion of the approach to the cumulative analysis and the County's coordination process with other nearby jurisdictions, including the City of South Gate, for determining the list of cumulative projects. Additionally, as noted in the responses mentioned above, the Traffic Impact Study includes an ambient growth rate of one percent to generate future traffic volumes that accommodate additional cumulative (or related) projects that were not known and could not be known, when the traffic analysis was

prepared. Refer to Response to Comment No. B5-3 for a further discussion of the approach to the Project's cumulative impact analysis.

With respect to the commenter's request for a recirculated Draft EIR, refer to Responses to Comment Nos. B5-3 and B5-46 for a discussion of why recirculation is not necessary.

Response No. B5-22

This comment states that the development is unclear and the Project Description is undefined, and therefore, the aesthetics analysis is too flexible. Page 3.1-23 of Section 3.1, *Aesthetics*, indicates that the ultimate design of the buildings would be determined during the design phase.

As further described in Response to Comment No. B5-14, and as indicated in Section 2.4.1, *Project Overview and Design Build Process*, the Project will be executed through a "design build" contractor, who would be selected when and if the Project is approved. As stated on Draft page 2-18, design-build contracting is a process in which both the design and the construction of a project are procured from a single entity and which allows for a collaborative approach that can result in reduced costs and improved design quality. However, pages 3.1-22 through 3.1-24 of Section 3.1, *Aesthetics*, provide requirements for building design, including, but not necessarily limited to, the following, which provides a detailed framework of building design that was used in the aesthetics impacts analysis: (1) the architectural style of the new buildings would, as mandated in the County's Best Practices for Design Excellence, be modern, efficient, and sustainable (County of Los Angeles, n.d.); (2) the design would not attempt to recreate the former styles represented on the existing subject property and would be differentiated from the remaining historic buildings in order to not present a false sense of history; (3) materials used for the Project would be selected based on durability, minimal maintenance, aesthetic longevity, sustainability, color retention, structural integrity, and ease of upkeep and replacement; (4) while the scale and massing of some of the new construction would be greater than adjacent historic buildings, aggressive setbacks and step-backs, as well as flat roofs with parapets set back from building façades would be used to visually minimize the perceived height of the buildings; and (5) if removed in the future, the essential form and integrity of the adjacent historic buildings would be unimpaired. Therefore, page 3.1-24 concludes that, although the new buildings would not be compatible with the size, scale, and proportion of the existing buildings, the new buildings would provide a landscaped new development with visual variety to the Project Site. Additionally, as also stated on page 3.1-24 and as described further in Section 3.4, *Cultural Resources*, of this Draft EIR, the Project would implement Mitigation Measures MM-CUL-1b and CUL-1c to ensure that significant architectural characteristics would be captured in the Project as informational programming or potentially as restoration or rehabilitation projects on the Project Site.

Page 3.1-23 also indicates that open space comprising of hardscape and landscape would surround the buildings and link the buildings within the larger Project Site; ensure maximum building heights for the ISD Headquarters, Probation Headquarters, and County Office Building of 90 feet (6 stories), 90 feet (6 stories), and 75 feet (5 stories), respectively; the Water Tower (LACO No. 1301) would remain on-site and at 100 feet, providing a unique visual focal point;

and several other visually unique buildings would remain on the Project Site, including LACO Nos. 1238 and 1100 to illustrate the unique visual character of the Project Site as viewers enter to the north from Erickson Avenue.

Therefore, the Draft EIR provides clearly defined designed features that were used in the aesthetics analysis.

Refer to Response to Comment No. 14 for a discussion of the flexibility allowed by CEQA and case law to respond to unforeseen or changing conditions with respect to future Project design.

Response No. B5-23

This comment states that the description of the proposed buildings' design is lacking and suggests a block diagram to illustrate the height and mass of the new buildings. As stated on page 3.1-23 of Section 3.1, *Aesthetics*, of the Draft EIR, the maximum buildings heights for the ISD Headquarters, Probation Headquarters, and County Office Building would be up to 90 feet (6 stories), up to 90 feet (6 stories), and up to 75 feet (5 stories), respectively, from ground level. The ISD/Probation Parking Structure and County Office Parking Structure would be up to 90 feet (9 stories) and up to 36 feet (3 stories), respectively, from ground level. These heights would be substantially taller than the existing mostly one- and two-story buildings. As stated on page 3.1-23, the new construction would be required to be compatible with the massing, size, scale, and architectural features of the adjacent historic resources, yet be differentiated from the old, ensuring that the historic resource remains the focal point. Page 3.1-24 indicates that compatibility would be achieved through the use of aggressive setbacks and step-backs, as well as flat roofs with parapets that are set back from building facades that would be used to visually minimize the perceived height of the buildings. This information, along with the information provided in Responses to Comments Nos. B5-22 and B5-23 provide sufficient Project description details to analyze physical environmental impacts that could occur with implementation of the Project using the thresholds of significant provided in Section 3.1, *Aesthetics*, of the Draft EIR.

Response No. B5-24

This comment requests an explanation regarding how implementation of Mitigation Measures MM-CUL-1b and CUL-1c would mitigate impacts the Project site's visual character. As stated on page 3.1-24 of Section 3.1, *Aesthetics*, of the Draft EIR, the Project would implement Mitigation Measures MM-CUL-1b and CUL-1c to ensure that significant architectural characteristics would be captured in the Project as informational programming or as restoration or rehabilitation projects on the Project Site. Mitigation Measure MM-CUL-1b requires implementation of an Interpretive and Commemorative Program to capture the visual characteristics and significance of the Project Site. This program will feature a variety of informational programming that may include an on-site interpretation program, artifacts, documentary film, and/or commemorative plaques to educate the public on the importance of the site. Mitigation Measure MM-CUL-1c requires creation of an inventory of the character-defining physical features of the buildings to be demolished and salvageable items and materials would be made available for the interpretive program or for use in future restoration/rehabilitation projects developed on the Project Site under

Mitigation Measure MM-CUL-1b. Other materials that would not be reused onsite would be offered for donation to local historical societies, preservation organization, or the like, for curatorial and/or educational purposes, or to the general public for reuse in rehabilitation of historic structures.

As further stated on page 3.1-24, the new buildings would be landscaped to provide visual variety to the Project Site. The Project would enhance and improve the roadways and pedestrian environment, while maintaining a view of the remaining historic buildings on the Project Site. Mitigation Measure MM-CUL-1b would retain historically significant visual characteristics of the Project Site and would present them to the public through the commemorative program. The program would be enhanced by implementation of Mitigation Measure MM-CUL-1c, which would retain salvageable items and materials for the program to use. Therefore, the Project, with implementation of the mitigation measures, would enhance the visual character and would not substantially degrade the existing visual character or quality of the site and its surroundings since the new buildings and/or interpretive program would preserve the visual characteristics of the Project Site.

The comment also states that the Draft EIR should be recirculated to include visual representations of how the site would look before and after development. Visual representations of the Project would be provided at a later date, when final design is complete. However, the information provided in Chapter 2, *Project Description*, is sufficient to analyze the environmental impacts related to aesthetics. Refer to Responses to Comment Nos. B5-3 and B5-46 for a discussion of why recirculation is not necessary.

Response No. B5-25

This comment states that the Draft EIR defers analysis of light and glare and the identification of potential mitigation measures. Impacts associated with light and glare are provided on pages 3.1-25 to 3.1-26 of Section 3.1, *Aesthetics*, of the Draft EIR.

Page 3.1-26 specifically addresses the commenter's concern regarding reflectivity of building materials and nighttime glare as part of the proposed Project design, as follows:

In regards to daytime glare, as stated in Chapter 2, *Project Description* (see specifically Subsection 2.4.3, Architecture and Design), materials for the Project would include low reflectivity glass and/or materials treated with a low-reflective coating, which would limit the amount of glare from the Project. The Project's materials would have low illumination that would reduce spillover and have low glare potential. Prior to issuance of applicable building permits, the Design Builder and the Los Angeles County Department of Public Works would review the exterior building materials to confirm that they do not exceed the reflectivity of standard building materials and would not adversely affect views of motorists or other nearby light-sensitive receptors. For nighttime glare, light emanating from building interiors or lighting from the parking areas could generate glare that would contrast with the dark sky or ambient darkness. However, interior lighting would be more subdued than exterior lighting. The interior lighting would also be

reduced due to the motion sensors and lighting controls that will be installed within the buildings and parking areas. All lighting that would be affixed to poles would be shielded or lensed to mitigate glare and provide soft illumination. All interior building lighting and Project Site lighting would eliminate upwards lighting, which would reduce impacts on nearby receptors. The ISD/Probation Parking Structure would be located closest to the residential uses east of the Development Area. However, the Project would minimize rooftop light spillage onto the surrounding residential properties, and lighting or headlights from the Parking Structure would not spill onto surrounding properties. Environmental impacts from a new source of substantial light or glare during long-term operation of the proposed Project would be less than significant.

Therefore, the Project will utilize low-reflectivity glass and/or materials treated with a low-reflective coating to limit the amount of glare from the Project. The Project will utilize low illumination materials that have low glare potential would reduce spillover. In addition, the Project would abide by a number of codes that also govern light and glare, such as California Building Code (Title 24, Part 1) and California Electrical Code (Title 24, Part 3), which stipulate minimum light intensities for pedestrian pathways, circulation ways, and paths of egress. California Energy Code (Title 4, Part 6) stipulates allowances for lighting power and provides lighting control requirements for various lighting systems, with the aim of reducing energy consumption through efficient and effective use of lighting equipment. Section 147 of the California Energy Code sets forth outdoor lighting allowances in terms of watts per area for lighting sources other than signage. California Green Building Standards Code (CALGreen Code), Part 11 of Title 24, stipulates maximum allowable light levels, efficiency requirements for lighting, miscellaneous control requirements, and light trespass requirements for electric lighting and daylighting.

Also, as stated on page 2-23, the Project would be designed to obtain a LEED Gold level of certification under the most current version of the Leadership in Energy and Environmental Design (LEEDv4) program, or the equivalent. Therefore, the Project would incorporate LEED strategies into the Project scope, including lighting that must be controlled to eliminate illumination spill and reduce light pollution, thereby promoting the Dark Sky principle. The County Office Building and ISD Headquarters/Probation Headquarters would each have their own separate certification submittal. The Project would achieve a minimum of 18 percent energy efficiency beyond the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Standard 90.1, which provides energy standards for commercial buildings.

Compliance with all of these codes would be accomplished through project design and confirmed as part of the building permit process and the LEED certification process and would ensure that impacts would be reduced to a less-than-significant level, as analyzed on pages 3.1-25 to 3.1-26; therefore, no mitigation measures are required. With respect to the commenter's request for a recirculated Draft EIR, refer to Responses to Comment Nos. B5-3 and B5-46 for a discussion of why recirculation is not necessary.

Response No. B5-26

This comment states that the Draft EIR does not include an illustration to demonstrate potential shade and shadow impacts that would result from the Project and suggests that the impact was conclusory.

The analysis of shade and shadow impacts is provided on page 3.1-26, which states that shade-sensitive uses near the Project Site include residential uses, open space, and a school, and commercial and retail uses are not considered shade-sensitive. The maximum building footprint was conservatively used to determine shading impacts. While the Project would include setbacks, sidewalks, and landscape buffers between streets and buildings, it is conservatively assumed that the proposed ISD Headquarters (6 stories), Probation Department Headquarters (6 stories) and/or the ISD/Probation Parking Structure (9 stories) could potentially shade the residential houses east of the Project Site, along portions of the cul-de-sac along Smallwood Avenue. Given the building sizes and heights necessary to accommodate County staff, no mitigation measures would be feasible to reduce impacts to less than significant. Therefore, such shade and shadow impacts would be significant and unavoidable. It should be noted that the Final EIR includes a modified alternative that addresses setbacks to nearby residences. In Alternative 4 Scenario 2, the ISD/Probation Parking Structure would be setback at least 118 feet from the eastern Project Site boundary to provide an increased distance between the new development and the nearby residential neighborhood east of the Project Site as compared to the Project. Please refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and corresponding aesthetic analysis.

Response No. B5-27

This comment states that the effectiveness of the mitigation measures to reduce the impact of VOC and NO_x emissions from construction activities is not identified in the Draft EIR. Regional construction emissions after implementation of the required mitigation measures are calculated quantitatively in Appendix B, Air Quality Emissions Calculations, under the subheading, *Mitigated Regional Construction Emissions*. These results are summarized in Table 3.2-5 of Section 3.2, *Air Quality*, of the Draft EIR. Implementation of Mitigation Measures MM-AIR-1 and MM-AIR-2 during construction would reduce impacts to Project construction VOC and NO_x emissions to below SCAQMD regional thresholds. The SCAQMD thresholds for VOC and NO_x are provided on page 3.2-23 and the conclusion is provided on page 3.2-34. Thus, the Draft EIR concludes that construction impacts related to air quality emissions would be less than significant with mitigation.

Response No. B5-28

This comment requests that impacts related to the use of haul trucks for the transport of construction-related soils (both import and export materials) should be considered in the air quality analysis.

Emissions associated with haul trucks for this use were quantified in the analysis as described in Appendix B, Air Quality Emissions Calculations under the subheading, *Hauling Emissions* of the *Unmitigated Regional Construction Emissions* section. Construction-related NO_x emissions are

discussed in Section 3.2, *Air Quality*, on pages 3.2-25 through 3.2-27 and on page ES-7 (for Impact AIR-2) in the Executive Summary of the Draft EIR. Impacts related to construction-related emissions, including NO_x, were determined to be less than significant with mitigation because implementation of Mitigation Measures MM-AIR-1 and MM-AIR-2 would reduce impacts to Project construction VOC and NO_x emissions to below SCAQMD regional thresholds.

Refer to Responses to Comment Nos. B5-17 and B5-18 for a further discussion of truck trips associated with the import and export of soils associated with construction activities and how that information was used in the Draft EIR's impacts analysis.

Response No. B5-29

The comment states that Table 3.2-8 of the Draft EIR identifies an exceedance for carbon monoxide, but not for nitrogen dioxide. To clarify, Table 3.2-8's third row that displays the exceedance refers to nitrogen dioxide, State 1 hour, ppm. This is further described in Appendix B, *Air Quality Emissions Calculations*, under the subheading, *Unmitigated Localized Construction Emissions*.

Response No. B5-30

This comment indicates support for Draft EIR's Mitigation Measure MM-BIO-3. No further response is necessary.

Response No. B5-31

This comment states that it is unclear whether the necessary AB 52 consultation was completed. The comment also indicates that page 3.4-14 of the Draft EIR referenced "Appendix #," rather than Appendix D. In response to the comment, a text change to the Draft EIR has been provided to refer to Appendix D-1, which contains the Rancho Los Amigos Historic District Analysis Report. This revision to page 3.4-14 of the Draft EIR is shown below and is included in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of the Final EIR.

A full description and evaluation of the District is provided in Appendix # D-1, and the following presents a summary of this information.

This minor clarification does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it.

In terms of AB 52 consultation, pages 3.12-2 and 3.12-3 of the Draft EIR discuss Native American Consultation (in the section entitled "Native American Consultation") and consultation is also addressed in Appendix I, with both discussions indicating that AB 52 consultation was completed.

Response No. B5-32

This comment states that consultation with the Gabrieleno-Kizh Nation should be conducted in order to comply with the requirements of AB 52. Section 3.12, *Tribal Cultural Resources*, of the Draft EIR discusses compliance with AB 52 and states that information contained in that section is based on consultation and information received from the Gabrieleno-Kizh Nation.

Response No. B5-33

The comment correctly presents the Los Angeles County General Plan goals and policies that were identified on page 3.4-28 of Section 3.4, *Cultural Resources*, and questions whether implementation of the Project is in violation of the County's General Plan. The comment specifically identifies six policies under the General Plans' overarching Goal C/NR 14, which refers to "Protected historic, cultural, and paleontological resources."

The following describes how the Project is consistent with each of six policies that the commenter identifies.

- Policy C/NR 14.1: Mitigate all impacts from new development on or adjacent to historic, cultural and paleontological resources to the greatest extent feasible.
 - Consistency Analysis: The proposed Project, as well as the alternatives evaluated in detail in Chapter 4, *Alternatives*, of the Draft EIR, evaluates potential impacts to historic, cultural, and paleontological resources and provides 16 detailed mitigation measures that contain specific performance standards to reduce potential impacts to cultural resources, including historic, archaeological, paleontological, and human remains.

Section 3.4, *Cultural Resources*, provides eight impact statements (and associated impact conclusions) related to cultural resources. The Project will result in no impact or impacts that would be reduced to a less-than-significant level with implementation of the identified mitigation measures for 7 of these 8 impact conclusions addressing construction and operational impacts. Construction impacts to historic archaeological resources would result in a significant and unavoidable impact. Since potential impacts to historical resources could not be mitigated to a less-than-significant level, a range of alternatives were considered in the Draft EIR that would reduce potential impacts. Based upon comments received on the Draft EIR, an additional scenario, Scenario 2, under Alternative 4 – the Adaptive Reuse Alternative – was developed and included in the Final EIR to reduce potential impacts to historical resources to the greatest extent feasible.

In summary, all impacts to historic, cultural, and paleontological resources associated with construction and operation of this Project have been mitigated to the greatest extent feasible.
- Policy C/NR 14.2: Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.
 - Consistency Analysis: This policy communicates a preference of collaboration between the County of Los Angeles and other jurisdictions to protect and enhance certain resources, which are assumed to include entities that protect cultural resources, such as Native American tribes and/or representatives, the Native American Heritage Commission, and the South Central Coastal Information Center. This Project supports

- this policy because implementation of Mitigation Measures MM-CUL-2c and MM-CUL-2e requires preparation of a Cultural Resources Monitoring and Mitigation Program that requires the establishment of communication protocols with the Native American tribal representatives, provisions for Native American monitoring, submittal of an Archaeological Resources Monitoring Report to the South Central Coastal Information Center, and submittal of a confidential report to the NAHC if human remains are encountered.
- Policy C/NR 14.3: Support the preservation and rehabilitation of historic buildings.
 - Consistency Analysis: The Project fully considered and evaluated the preservation and rehabilitation of historic buildings, both in the analysis of the Project and in the evaluation of alternatives to the Project. The EIR analyzed potential impacts to historical resources, which included a survey update of the historic district, analysis of potential project impacts, and development of mitigation measures and alternatives to reduce significant impacts to the extent feasible. In addition, the County conducted a feasibility study that documented and analyzed the current conditions, determined the work necessary to rehabilitate the structures for County use, analyzed the costs involved, and summarized the resulting feasibility of adaptive reuse for each individually eligible building and each of the primary and secondary contributing buildings (Harlan et al., 2020). The feasibility study also examined the feasibility of mothballing these structures. Based upon the analysis provided in the feasibility study, it was determined that a select group of additional historic structures are feasible for adaptive reuse and preservation; therefore, these structures were incorporated into Scenario 2 under Alternative 4 in the Final EIR.
 - Policy C/NR 14.4: Ensure proper notification procedures to Native American tribes in accordance with Senate Bill 18 (2004).
 - Consistency Analysis: The Project complies with this policy because the EIR’s cultural resources investigations included proper notification to Native American tribes in accordance with SB 18, or Assembly Bill (AB) 52 tribal consultation, to provide consultation at the early stages of planning decisions. Appendix I of the Draft EIR documents the Native American Consultation process for the proposed Project conducted between the County of Los Angeles and the Gabrieleno Band of Mission Indians – Kizh Nation (Tribe) in accordance with Public Resources Code Section 21080.3.1(d), pursuant to AB 52. In addition, a summary of the consultation process is provided in the Native American Consultation section of the Draft EIR, which is provided on pages 3.13-3 through 3.13-4 of Section 3.13, *Tribal Cultural Resources*, of the Draft EIR.
 - Policy C/NR 14.5: Promote public awareness of historic, cultural, and paleontological resources.
 - Consistency Analysis: The Final EIR includes two specific mitigation measures that would promote public awareness of historic, cultural, and paleontological resources. Language from these mitigation measures include:
 - **Mitigation Measure MM-CUL-1a (MM-CUL-1a): Recordation of the District’s Site Plan.** Prior to any demolition or ground disturbing activity, the County shall retain a Qualified Preservation Professional to prepare a Historic American Landscape Survey (HALS) Level I Standard Format documentation of the District’s Site Plan and landscape setting, including hardscape and softscape elements and features from the historic period of significance, such as roadways, curbs, sidewalks,

mature trees, fields, gardens, and green spaces. The HALS documentation of the District's Site Plan shall record the history of the contributing elements, as well as important events or other significant contributions to the patterns and trends of history with which the property is associated.

The Qualified Preservation Professional shall submit the HALS documentation to the National Park Service for transmittal to the Library of Congress, and archival copies shall be sent to Rancho Los Amigos, County of Los Angeles Natural History Museum, Rancho Los Amigos Archives at University of Southern California, and Downey History Center. The Qualified Preservation Professional shall submit proof of submittal to the County no less than 30 days prior to the start of demolition of District contributing buildings, structures, and features.

- **Mitigation Measure MM-CUL-1b (MM-CUL-1b): Interpretive and Commemorative Program.** The County shall retain a Qualified Preservation Professional to develop and implement a publicly accessible interpretive and commemorative program (Program), in consultation with the County, that captures and incorporates the important cultural history, associations, and significance of the Rancho Los Amigos Historic District for the public benefit, such that the cultural importance of the Los Angeles County Poor Farm and Rancho Los Amigos is retained for future generations.

In addition, there are two mitigation measures that relate to construction worker cultural resources sensitivity training (MM-CUL-2b and MM-CUL-3b), which also promotes an awareness of cultural resources.

- Policy C/NR 14.6: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.
 - Consistency Analysis: The Final EIR includes mitigation measures in line with this policy that ensures that proper notification and recovery processes are carried out during project construction, with states all recovery processes require notification. Language from these mitigation measures include:
 - **Mitigation Measure MM-CUL-1c (MM-CUL-1c):** Prior to the start of demolition, the County shall retain a Qualified Preservation Professional to prepare a Salvage Plan and Inventory Report outlining salvageable materials and reuse or disposal options.
 - **Mitigation Measure MM-CUL-2c (MM-CUL-2c):** Any historic-period archaeological materials that are not Native American in origin shall be curated at a repository accredited by the American Association of Museums that meets the standards outlined in 36 Code of Federal Regulations (CFR) Section 79.9.

If, based on the recommendation of the Qualified Archaeologist, it is determined that the discovered archaeological resource constitutes a historical resource or unique archaeological resource pursuant to CEQA, avoidance and preservation in place shall be the preferred manner of mitigating impacts to such a resource pursuant to CEQA Guidelines Section 15126.4. Preservation in place maintains the important relationship between artifacts and their archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not

limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement.

In the event that preservation in place is determined by the County to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Data Recovery and Treatment Plan shall be prepared and implemented by the Qualified Archaeologist in coordination with the County that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource.

- **Mitigation Measure MM-CUL-3c (MM-CUL-3c):** Any significant fossils collected during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries.

The Qualified Paleontologist shall prepare weekly status reports detailing activities and locations observed (with maps) and summarizing any discoveries for the duration of monitoring to be submitted to the County via email for each week in which monitoring activities occur. Monthly progress reports summarizing monitoring efforts shall be prepared and submitted to the County for the duration of ground disturbance.

- **Mitigation Measure MM-CUL-3d (MM-CUL-3d):** If construction or other Project personnel discover any potential fossils during construction, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and made recommendations as to the appropriate treatment. If the find is deemed significant, it shall be salvaged following the standards of the SVP (SVP, 2010) and curated with a certified repository.
- **Mitigation Measure MM-CUL-4 (MM-CUL-4):** Human remains discoveries shall be treated in accordance with the California Health and Safety Code Section 7050.5 and PRC Section 5097.98, requiring assessment of the discovery by the County Coroner, assignment of a Most Likely Descendant by the NAHC, and consultation between the Most Likely Descendant and the County (landowner) regarding treatment of the discovery.

Response No. B5-34

This comment states that no mitigation measures to reduce on-site electrical and natural gas consumption were included for Section 3.5, *Energy*, of the Draft EIR. The comment suggests new parking fields and/or parking structures could use solar panels and similar equipment. CEQA Guidelines Section 15126.4 only requires mitigation measures to minimize the significant environmental effects of a Project. The analysis in Section 3.5, *Energy*, of the Draft EIR provides a quantified evaluation of impacts to energy (using CalEEMod), and concludes there are no significant impacts because the Project will comply with specific codes designed to reduce energy consumption, including building energy standards pursuant to the Title 24 Building Standards Code and the CALGreen Code. The Project would also implement additional strategies in order to obtain LEED Gold certification under the most current version of the LEEDv4 program. Each of these codes, the methodology for the approach to the energy analysis, and the energy analysis

itself is provided on pages 3.5-3 to 3.5-4, 3.5-6 to 3.5-8, and 3.5-8 to 3.5-16). set forth within that section. Therefore, mitigation measures are not required.

The CALGreen Code establishes mandatory measures for new residential and non-residential buildings, which include requirements for energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code was most recently updated in 2016 to include new mandatory measures for residential as well as nonresidential use.

Response No. B5-35

This comment states that the Project will add new building floor area which will increase electrical and natural gas consumption and requests an explanation of the relationship between fossil fuel consumption and electrical generation. It is unclear exactly what information the comment requests.

As described on page 3.5-11, the Southern California Gas Company would provide the Project's natural gas supplies, and Southern California Edison would provide the Project's electrical supplies. Table 3.5-2 shows construction-related fossil fuel use. Table 3.5-5 shows that the Project would result in a very small percentage of the total gas and electricity consumption in both Los Angeles County and for the respective utility provider. Based on the Project's estimated natural gas consumption as shown in Draft EIR Table 3.5-5, the Project would account for approximately 0.00072 percent of SoCalGas' 2017 sales by the Project's buildout year.

The Project is estimated to increase natural gas demand by 6.77 million kBtu per year, accounting for approximately 0.00061 percent of SoCalGas' projected natural gas demand for the year 2022. Therefore, it is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the Project's demand for natural gas.

In addition, if the comment questions fossil fuel consumption relative to the generation of electricity, fossil fuel consumption in the electric power sector has declined to 22.5 quadrillion British thermal units (quads) in 2017, the lowest level since 1994. The declining trend in fossil fuel consumption by the power sector has been driven by a decrease in the use of coal and petroleum with a slightly offsetting increase in the use of natural gas. Changes in the fuel mix and improvements in electricity generating technology have also led the power sector to produce electricity while consuming fewer fossil fuels (United States Energy Information Administration, 2018). As the analysis contained within Section 3.5, *Energy*, of the Draft EIR provides the requested analysis by the commenter, no revisions are necessary and recirculation is not required.

Response No. B5-36

This comment requests confirmation that the GHG threshold used in the Draft EIR is the most current approach as required by SCAQMD and CARB. There has not been any additional guidance applicable to any projects, including this Project, from SCAQMD or CARB since the interim GHG screening level significance threshold was recommended for residential and commercial projects in 2008. As detailed on page 3.6-17 of Section 3.6, *Greenhouse Gas*

Emissions, of the Draft EIR, the Governor’s Office of Planning and Research (OPR) released a *Discussion Draft: CEQA and Climate Change Advisory* in December 2018 to provide updates and regulatory changes to a prior 2008 climate change advisory. The discussion draft addresses project-level analyses of greenhouse gas impacts and recognizes, “lead agency discretion in determining the appropriate methodologies, thresholds, and if necessary, mitigation measures” (Governor’s Office of Planning and Research, 2018). As further stated on page 3.6-18 and consistent with the comment’s request to confirm thresholds are current for the Project, Los Angeles County, as the lead agency, has selected a 3,000 MTCO₂e/year quantitative threshold to evaluate significance for GHG emissions. This is the interim GHG screening level significance threshold recommended by SCAQMD in 2008 for residential and commercial (mixed-use) projects (SCAQMD, 2008). In the absence of an applicable Climate Action Plan, a percentage below BAU would be difficult to calculate for a specific project. Efficiency thresholds are most suited to fit projects with a service population consisting of residential units and employees or a larger Master Plan, which is not appropriate for this Project. Therefore, the 3,000 MT CO₂e/year quantitative threshold was determined to be most appropriate quantitative threshold given the current state of guidance for GHG emissions. Therefore, no revisions are necessary.

Response No. B5-37

This comment states that additional mitigation to address GHG impacts are required and suggests ride-sharing, transit use, and charging stations as additional mitigation measures. The comment states that mitigation measures related to emergency generators will have limited utility and cites Mitigation Measure MM-AIR-5 related to a Transportation Demand Management (TDM) program.

The Draft EIR requires the following five mitigation measures to reduce greenhouse gas emissions including one related to the use of emergency generators:

- **MM-AIR-1:** The County shall use coatings that comply with SCAQMD Rule 1113, as applicable. The project will strive to utilize material which is pre-primed or pre-painted. Additionally, the County shall limit daily application of architectural coatings applied onsite to 155 gallons per day during construction with an average of 50 grams VOC per liter of coating, less water and less exempt compounds, or equivalent usage resulting in similar or less VOC emissions. The County shall provide to the SCAQMD a comprehensive inventory of all coating material that will be used during any of the construction phases.
- **MM-AIR-2:** The County shall implement construction equipment features for equipment operating at the Project Site and shall include these features in applicable bid documents. Construction features will generally include off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 Final off-road emissions standards for equipment rated at 50 horsepower (hp) or greater during Project construction; and alternative-fueled generators shall be used when commercial models that have the power supply requirements to meet the construction needs of the Project are commercially available from local suppliers/vendors.
- **MM-AIR-3:** The County shall schedule routine maintenance and testing of the emergency generators installed on the Project Site on different days so that only one generator is being maintained on any given day.

- MM-AIR-4: The County shall select all new standby generators proposed from the South Coast Air-Quality Management District's certified generators list and meet the EPA Tier 4 standard for diesel emissions. For after-treatment of engine exhaust air, the County shall provide diesel particulate filters to meet the emission level requirements of the South Coast Air Quality Management District. The Project would have four generators and would need to be tested monthly to ensure reliability in the case of a power outage.
- MM-AIR-5: The County shall prepare a Transportation Design Management (TDM) program detailing strategies that would reduce the use of single occupant vehicles (SOV) by employees by increasing the number of trips by walking, bicycle, carpool, vanpool and transit. The County shall be responsible for ensuring that the TDM program is acceptable, and the TDM coordinator for each building will be responsible for implementation of the TDM Program.

The full text of Mitigation Measure MM-AIR-5, which is provided on page 3.2-40 of the Draft EIR, more fully describes the use of ride sharing and transit, as suggested by the commenter. Also, refer to Response to Comment No. B5-15 for a description of EV charging stations, which are part of the Project and further described in Chapter 2, *Project Description*, of the Draft EIR.

Response No. B5-38

This comment requests that the Draft EIR identify the quantities of potentially contaminated demolition debris disclosed, the haul routes, and where the materials will be disposed. Table 3.13-5 in Section 3.13, *Utilities and Service Systems*, identifies the total amount of building demolition debris that would result from Project construction. The haul route is identified on page 3.10-28 of Section 3.10, *Noise*, of the Draft EIR.

Impact UTL-4, provided on page 3.13-16, indicates that demolition and construction of the proposed Project would generate 53,827.08 tons of solid waste not accounting for the 50 percent diversion rate mandated by AB 1374. Taking into account the mandatory 50 percent diversion rate, 26,913.54 tons of solid waste would be generated by demolition and construction of the proposed Project, and would account for approximately 0.03 percent of the total remaining capacity of 106.8 million tons at the Frank R. Bowerman Sanitary Landfill. The Project would also implement a construction waste management plan to divert all mixed construction and demolition debris to City-certified construction and demolition waste processors, consistent with Downey Municipal Code Section 5870. 5,333 cy, or 6,399.6 tons, of contaminated soil would be exported from the Project Site during demolition and construction activities, and would account for 0.09 percent of the total remaining capacity of 4.9 million cubic yards or 7.35 million tons at the Kettleman Hills Landfill. Table 3.13-5, *Estimated Construction and Demolition of Solid Waste Generation*, provides a summary of all construction-related solid waste.

Responses to Comments Nos. B5-17 and B5-18 also provide a discussion of the quantity of demolition debris (i.e., export material). These responses also address import material and how this information was used in the Draft EIR's impacts analysis.

In terms of haul routes, refer to Response to Comment No. B5-60. In summary, as stated on page 3.10-28 of the Draft EIR, trucks are expected to travel on the Interstate 710 (I-710) freeway to

Imperial Highway and Erickson Avenue to access the Project Site, which would be the most direct route from the I-710 freeway and would consist of the fewest sensitive receptors. Lastly, as stated on page 3.13-3 of Section 3.13, *Utilities and Service Systems*, of the Draft EIR, contaminated soil and other materials would be hauled off-site and disposed of at the Kettleman Hills Landfill in Kettleman City, California.

Response No. B5-39

The commenter correctly quotes text from Section 3.7, *Hazards and Hazardous Materials*, of the Draft EIR, which indicates that there would be “no lane closures outside of the Project Site.” The commenter requests explanation of how lane closures will not occur when new infrastructure connections and other street improvements will be required.

As stated on page 2-1 of Chapter 2, *Project Description*, of the Draft EIR, new County facilities and associated infrastructure would be constructed within the 35-acre portion of the Project Site referred to as the Development Area. Because all infrastructure improvements would be made internal to the Project Site, which is a self-contained area not directly adjacent to or immediately connected to surrounding public roadways, no road closures would be necessary. All infrastructure connections from the Project Site to offsite locations would be provided via Erickson Avenue and Flores Street; no utilities would connect via Imperial Highway or Gardendale Street. Further, Mitigation Measures TRA-1 provides for implementation of a Construction Traffic Management Plan that requires temporary pedestrian and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways.

Further, the Project does not propose any street improvements that would be implemented by the County as part of the Project; therefore, no street closures would be required. However, the Project does propose two mitigation measures, MM-TRA-2 and MM-TRA-3, that require the County to provide a fair-share contribution towards restriping the eastbound Imperial Highway approach to the Wright Road intersection to provide one additional through lane and the installation of a traffic signal at Erickson Avenue and Gardendale Street. If implemented, these improvements would be made by the City of South Gate and the City of Lynwood (for the Imperial Highway improvement proposed under Mitigation Measure MM-TRA-2) and the City of Downey and the City of South Gate (for the traffic signal improvement proposed under Mitigation Measure MM-TRA-3), and any lane closures, if required, would be proposed by and implemented by those jurisdictions when the improvement takes place.

Response No. B5-40

This comment states that the Draft EIR does not provide comparative analysis indicating the location and extent of impervious surfaces for both pre-Project and post-Project conditions and that without this information, it is not possible to provide quantification for surface water flows, storm water drainage impacts, and necessary improvements. As stated on page 3.8-1 of Section 3.8, *Hydrology and Water Quality*, of the Draft EIR, approximately 70 to 80 percent of the Project Site is currently covered by buildings and impervious surface. Assuming the area of

development is 35 acres, this would be approximately 28 acres of impervious surfaces. Specific locations of impervious surfaces are not required because surface runoff would drain to the existing drainage system as described on page 3.8-2. As stated on page 3.8-27, the proposed Project would have a comparably similar number of impervious surfaces when compared to current conditions. As stated in Chapter 2, *Project Description*, of the Draft EIR, approximately 4.25 acres of the Development Area would be landscaped, which would result in about 30 acres of impervious surfaces. As concluded on page 3.8-24 of the Draft EIR, the proposed Project would have a similar amount of impervious surfaces when compared to current conditions. However, as previously stated, the Project would be designed to obtain a LEED Gold level of certification under the most current version of the Leadership in Energy and Environmental Design (LEEDv4) program, or the equivalent. As part of that process, LEED “points” are given for reducing impervious surfaces (such as concrete) and associated stormwater runoff; therefore, it is likely that the Project would result in more impervious surfaces as compared to current conditions, but to provide a conservative analysis, it is assumed that the conditions would remain the same as under current conditions. Additionally, the Project Site outside of the Development Area, or approximately 39-acres, would be hydroseeded and would remain as open space, unless or until future development occurs. Therefore, this area would generally remain open space and remain pervious.

As stated on page 3.8-26, operation of the proposed Project would not substantially alter the existing drainage pattern of the Project Site.

Response No. B5-41

This comment disagrees with the finding that the Project’s inconsistency with the City of Downey’s Rancho Business Park Specific Plan 88-1 does not result in a significant environmental impact.

As stated on page 3.9-10 of Section 3.9, *Land Use and Planning*, the Project would develop County uses on County-owned land and pursuant to California Government Code Section 65402, the Project is not required to be consistent with SP 88-1. Further, as described in Response to Comment No. B5-3, an updated Specific Plan is currently being prepared (the Rancho Los Amigos South Campus Specific Plan), which would supersede the previous and outdated Specific Plan 88-1. The 1988 Specific Plan proposed to phase out the existing hospital and administrative uses on a 12-acre parcel in the South Campus area and replace those uses with light industrial uses with a central open space area.⁷ The 1988 Specific Plan is not consistent with the goals of the updated Specific Plan that is currently under preparation. The 1988 Specific Plan considered almost 2,250,000 square feet of light industrial uses. According to the NOP, the Rancho Los Amigos Specific Plan considers commercial, retail, and mixed-use opportunities, residential development, public and open spaces, an improved pedestrian environment, and a variety of transportation choices that will enhance the potential for a multi-modal transportation center and

⁷ The 1988 Specific Plan considered three phases of development over a 120.9-acre site generally located south of Amigos Avenue, north of Gardendale Street, West of Rives Avenue, and east of Flores Street: Phase I was previously evaluated and implemented as part of SP 85-1; Phase II was evaluated as the project in SP 88-1; and Phases III and IV were evaluated in a conceptual manner in SP 88-1. SP 88-1 determined that implementation of Phases III and IV would require subsequent studies, public hearings, and amendments of the SP if plans developed.

encourage and promote economic development and revitalization. Therefore, SP 88-1 is currently being updated by the Rancho Los Amigos Specific Plan to reflect the land uses currently anticipated and desired at the 172-acre Specific Plan Project site.

While the proposed Project is inconsistent with the land uses proposed under SP 88-1, an inconsistency with a plan, policy, or regulation does not necessarily equate to a significant physical impact on the environment unless the inconsistency would result in an adverse physical change to the environment that is considered a “significant environmental effect.” The physical environmental effects associated with the proposed change in land uses from those considered in SP 88-1 are evaluated in this EIR for a 35-acre Development Area and will be evaluated in the Rancho Los Amigos Specific Plan EIR for a 172-acre area that includes this Project’s 35-acre Development Area. The Rancho Los Amigos Specific Plan will cover a larger area than SP 88-1.

The comment suggests that the “development standards” from the 1988 Specific Plan would “protect the nearby residential neighborhoods from the proposed large buildings,” but it is unclear which standards the commenter references and what significant environmental effects these standards would reduce. No further response can be provided.

Response No. B5-42

The commenter suggests an inconsistency in language provided on page 3.9-12 of Section 3.9, *Land Use and Planning*, of the Draft EIR with respect to cumulative projects. In response to the comment, the Draft EIR will be revised to eliminate “and the City” in the first sentence, properly referring to the fact that the Project Site is solely governed by the land use controls established by the County of Los Angeles. This revision to page 3.9-12 of the Draft EIR is shown below and is included in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of the Final EIR.

The implementation of the proposed Project is consistent with the applicable policies, plans, regulations, and land use designations set forth by the County ~~and the City~~. Any other cumulative...

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it.

Refer also to Response to Comment No. B5-41 for a discussion of the Project’s relationship to the 1988 Rancho Business Park Specific Plan relative to the Specific Plan that is currently under preparation for the South Campus area.

Response No. B5-43

The comment indicates that no effort was made to model traffic noise from the potential cut-through traffic using local streets within the residential neighborhood located adjacent to the

Project Site on the east. Refer to Responses to Comment Nos. B5-46 and B5-55 for discussion of the traffic impact analysis for the Hollydale neighborhood. As stated on page 3.10-25 of Section 3.10, *Noise*, off-site traffic noise was evaluated based on roadway traffic volume data provided in the Traffic Impact Study and a less-than-significant impact was identified for Intersection No. 18, in the middle of the Hollydale area.

Response No. B5-44

The comment indicates that the analysis of cumulative noise impacts is incomplete because the list of cumulative projects is lacking. The commenter cites the following missing projects from the noise analysis: (1) the Gardendale Station of the WSAB Transit Corridor; (2) the Rancho Los Amigos South Campus Sports Center Project; (3) the City of Downey's Rancho Los Amigos Specific Plan Update; and other related projects adjacent to and in the City of South Gate, including the American Legion Site and the Tweedy and Atlantic Site.

Refer to Responses to Comment Nos. B5-3 and B5-21 for a discussion of the approach to the cumulative analysis; the list of related projects, including the WSAB Transit Corridor Project, the Rancho Los Amigos South Campus Sports Center project, and the City of Downey's Rancho Los Amigos Specific Plan; and why the two projects identified in this comment (American Legion Site and Tweedy and Atlantic Site) were not included in the list of cumulative projects.

According to the anticipated construction schedule for the Sports Center, construction would occur concurrently with the proposed Project and, as stated on page 3.10-38 of Section 3.10, *Noise*, of the Draft EIR, cumulative construction noise would exceed construction thresholds. Therefore, cumulative on-site construction noise is conservatively considered cumulatively significant under Draft EIR Impact NOI-1, and the Project would result in a cumulatively considerable contribution. The proposed Project would be subject to Mitigation Measures MM-NOI-1 through NOI-5. The Sports Center project is also under the jurisdiction of the County and is a County project. Mitigation Measure NOI-10 has been proposed to require the coordination of the two project's construction activities, and it would ensure that construction activities nearest to the residential uses to the east, St. Pius X - St. Matthias Academy, and residential uses to the south of Gardendale Street would not occur. Mitigation Measures NOI-1 through NOI-5 and NOI-10 would reduce the Project's contribution to less than cumulatively considerable at studied sensitive receptor locations.

Response No. B5-45

This comment questions the trip generation assumptions for the proposed Project. Refer to Responses to Comment Nos. B5-2, B5-3, and B5-65 for a discussion of trip generation assumptions.

Response No. B5-46

The comment expresses opposition to any vehicular access from Gardendale Street.

A description of internal access to the Project Site is provided on page 2-25, Section 2.4.6, *Parking, Access, and Circulation* (under subheading “Access”), of Chapter 2, *Project Description*, of the Draft EIR. As described on page 2-25, internal vehicular access to parking areas of the site would be provided from Golondrinas Street, Rives Avenue, Dahlia Street, and Flores Avenue or Laurel Street.

A text change to the Draft EIR has been provided to change the header on page 2-25, under Section 2.4.6, *Parking, Access, and Circulation*, from “Access” to “Internal Access.” Following the two existing paragraphs provided under the new “Internal Access” heading, a new header will be added that says “External Access.” Under “External Access,” a new paragraph will be added to state that 55 percent of Project-related vehicle trips would utilize Erickson Avenue for access to/from Gardendale Street via Intersection No. 16 (Erickson Avenue / Gardendale Street) to the south of the Project site, and 45 percent of Project-related vehicles trips would utilize Erickson Avenue to travel to/from Imperial Highway to the north of the Project Site. This revision to page 2-25 of the Draft EIR is shown below and is included in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of this Final EIR.

Internal Access

A secured Level 1 (ground floor) public entrance to the Project Site would be provided from Golondrinas Street, which is currently gated and does not allow for regular vehicle access. A dedicated entrance from the secured parking area to the ISD and Probation Department Headquarters buildings would also be provided. Off-campus visitors would arrive on campus through the new ISD/Probation Parking Structure. The ISD/Probation Parking Structure would contain two vehicular entry/exit locations from Rives Avenue and Golondrinas Street and two pedestrian access points. Loading docks for the ISD and Probation Department Headquarters Building(s) are proposed to be along the re-aligned Dahlia Street which would extent into Rives Avenue. The loading dock are proposed to be integrated into the building façade and be fully screened.

The County Office Building and County Office Parking Structure would be accessed from Flores Avenue or Laurel Street, and will be fully contained within the security wall with controlled access through ingress and egress gates. The primary access point for the County Office Building would be set back from the street and may include a covered entry.

External Access

With respect to external access, 55 percent of Project-related vehicle trips would utilize Erickson Avenue for access to/from Gardendale Street via Intersection No. 16 (Erickson Avenue / Gardendale Street) to the south of the Project site, and 45 percent of Project-related vehicles trips would utilize Erickson Avenue to travel to/from Imperial Highway to the north of the Project Site.

This revision to the Draft EIR describes information presented in the Traffic Impact Study and is assumed in the entirety of the traffic impact analyses. This clarification to the Draft EIR does not

require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it.

Tables 3.11-6 and 3.11-8 in the Draft EIR summarize the traffic analysis prepared for the Existing with Project and Future with Project conditions, respectively. Table 3.11-9 of the Draft EIR provides a summary of the intersections calculated to be significantly impacted by traffic (LOS) due to the Project after implementation of the identified mitigation measures, some of which are under the control of other agencies/jurisdictions. As shown in Table 3.11-9, four intersections along Gardendale Street are forecast to be significantly impacted by traffic due to the Project: Intersection No. 7 (Garfield Avenue / Monroe Avenue), Intersection No. 15 (Industrial Avenue / Gardendale Street), Intersection No. 16 (Erickson Avenue / Gardendale Street), Intersection No. 17 (Arizona Avenue / Gardendale Street), and Intersection No. 20 (Paramount Boulevard / Gardendale Street).

Potential mitigation measures to alleviate the significant traffic impacts at all of the affected intersections are described in the Draft EIR beginning on page 3.11-27. As described in the Draft EIR (e.g., page 3.11-29), these intersections are outside the jurisdiction of the Lead Agency (the County of Los Angeles) as they are located in the cities of Downey, South Gate, and/or Paramount. For each mitigation measure identified in the Draft EIR, its implementation cannot be guaranteed. Therefore, each of the impacts at the affected intersections along Gardendale Street are considered in the Draft EIR to be significant and unavoidable.

The analysis of potential traffic impacts in the area south of Gardendale Street (the Hollydale area) is provided in the Draft EIR through analysis of Intersection No. 18 (Industrial Avenue-Arizona Avenue / Main Street), which is located in the center of Hollydale area. Impacts at Intersection No. 18 would be less than significant under Existing with Project and Future with Project conditions, as shown in Tables 3.11-6 and 3.11-8 of the Draft EIR. In addition, Intersection No. 9 (Garfield Avenue / Main Street), which is located just west of the Hollydale area, would also result in a less-than-significant impact under both conditions. Therefore, due to the less-than-significant results, an additional analysis of potential traffic impacts in this area or the requirement for additional mitigation measures was not determined to be necessary.

The commenter states that it is unclear what the daily traffic volumes (existing and future) are/will be on Gardendale Street. The traffic analysis is based on an analysis of intersection levels of service during the weekday commuter peak hours (AM and PM) at the study area intersections, rather than daily (24-hour) traffic volume data/forecasts under existing and future conditions (e.g., a VMT analysis), consistent with the traffic analysis procedures and thresholds of significance utilized by the cities of Downey, South Gate, Paramount, Lynwood, and the County of Los Angeles (refer to page 3.11-11 of the Draft EIR). Accordingly, the analysis and forecast of existing 24-hour daily traffic volumes on streets such as Gardendale Street is not required, while AM and PM peak hour analyses are provided. This approach is fully consistent with CEQA.

(*Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal.App.4th 200, 245 [upholding LOS analysis based exclusively upon PM peak hour analysis].)

Recirculation of the Draft EIR, as requested in the comment, is not necessary because the Draft EIR adequately analyzes and discloses the potential impacts of the Project on Gardendale Street. In responding to all comments received on the Draft EIR, including this one, the Lead Agency has not identified new significant environmental impacts or a substantial increase in the severity of environmental impacts pursuant to State CEQA Guidelines Section 15088.5 that would give rise to the need for recirculation of the Draft EIR.

Response No. B5-47

As discussed on page 2-46 of the Draft EIR, aside from the Rancho Los Amigos South Campus Sports Center project (Cumulative Project No. 4 as depicted on Figure 2-8 of the Draft EIR), there are currently no other planned or foreseeable County projects or other proposed private development activities where applications have been submitted for the remaining available 39-acres of the 74-acre Rancho Los Amigos South Campus.

The commenter further states that “The Draft EIR seems to suggest that the mitigation measures are not planned to be implemented/constructed with the project. Instead, the Draft EIR indicates that Los Angeles County shall provide a fair-share contribution towards the installation of the mitigation measures.”

The Draft EIR has identified feasible mitigation that could reduce the impact at Intersection No. 3 (Wright Road / Imperial Highway) and Intersection No. 16 (Erickson Avenue / Gardendale Street), and has proposed fair share contributions towards these improvements. However, as clearly explained on pages 3.11-27 through -29 of the Draft EIR, many of these improvements are under joint jurisdiction with the City of South Gate, the City of Lynwood, and the City of Downey, and the County cannot guarantee that those jurisdictions will agree with their implementation.

As described in the Draft EIR, the effects due to Project-related traffic are measured relative to operations at the study intersections in the Existing and Future Cumulative conditions. Further, consistent with the thresholds of significance listed on page 3.11-11, a significant traffic impact generally occurs for those study intersections already operating at or forecast to operate at congested conditions (e.g., LOS C through F). Many of the proposed physical improvements within the mitigation measures would improve LOS conditions substantially beyond the project’s impact. For example, at Intersection 3 under cumulative conditions, the project would contribute to a change in LOS of 0.042 / 0.048 (Table 3.11-8 of the Draft EIR); however, the proposed physical improvements would result in an improvement in LOS well beyond the Project’s impacts (i.e. an improvement of 0.071 / 0.079 as shown on Table 3.11-9 of the Draft EIR). As CEQA does not require that projects alleviate existing or future traffic conditions not related to the project, it is appropriate that the mitigation measures identified in the Draft EIR are assigned to the Project on a fair share basis, such that Project’s responsibility to mitigate impacts is limited to its incremental effect at each affected study intersection. The timing of the contribution will be

included as part of the Mitigation Monitoring Reporting Program (MMRP), which will be provided to the Board of Supervisors with the Final EIR for consideration of approval.

The City of South Gate has expressly recognized the concepts of fair-share improvements in their own mitigation measures. For example, the July 30, 2012, Mitigated Negative Declaration for a 216-unit affordable housing development located at 2405 Southern Avenue identified Mitigation Measure 19, which requires the installation of a traffic signal at the intersection of Firestone Boulevard and Calden Avenue (as outlined in the Firestone Boulevard Corridor Capacity Enhancement Project) to mitigate project-related impacts. This mitigation measure specifically states that “The project applicant shall be responsible for their fair share of the cost of installing this signal. Currently, the cost of installing the signal is estimated to be \$400,000.00, and the applicant’s fair share would be \$100,000.00 (City of South Gate, 2015).” Similarly, for construction of the same traffic signal at the intersection of Firestone Boulevard and Calden Avenue (also under the Firestone Boulevard Corridor Capacity Enhancement Project), the City of South Gate also accepted fair-share funds in the amount of from the Los Angeles Community College District for project-related impacts associated with the South Gate Educational Center Master Plan Project (City of South Gate, 2019a).

Reliance on fee-based mitigation programs is appropriate if the fees are part of a reasonable plan of mitigation that an agency has committed to implement. A project's contribution of its fair share of fees to such a program will be treated as adequate mitigation if specific mitigation projects have been identified and the implementing agency has agreed to allocate fees to those projects. See *Schenck v County of Sonoma* (2011) 198 CA4th 949.

Response No. B5-48

The comment refers to a potential mitigation measure considered on page 3.11-29 of Section 3.11, *Transportation*, of the Draft EIR for Intersection No. 17 (Arizona Avenue / Gardendale Street), but rejected as infeasible, and questions whether there are any other feasible mitigation measures.

As noted in the comment, the potential installation of a traffic signal at the intersection of Arizona Avenue and Gardendale Street was deemed infeasible in the Draft EIR because the forecast traffic volumes at the intersection did not satisfy the standard signal warrants for the installation of traffic signals at unsignalized intersections, primarily due to an insufficient amount of side-street traffic volumes. Signal warrants are satisfied based on a minimum number of vehicles per hour on both the main roadway and minor roadway approach (or side street), as well as the duration of those traffic volumes.

The comment goes on to state that additional mitigation measures should have been evaluated for this intersection in the Draft EIR, but does not provide specific suggestions or recommendations. The commenter offers no additional suggestions as to potentially feasible LOS mitigation measures. CEQA does not require discussion of mitigation measures which are considered infeasible. As discussed under CEQA Guidelines “The EIR shall describe feasible measures...If the Lead Agency determines that a mitigation measure cannot be legally imposed, the measure

need not be proposed or analyzed.” (CEQA Guidelines § 15126.4(a)(5); see also *San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1, 15.)

The comment suggests that the traffic signal warrants worksheets provided in the Traffic Impact Study, contained in Appendix H of the Draft EIR, are incorrect, but the comment does not identify a specific issue or error. To clarify the signal warrant worksheets, the red asterisks show the Future with Project volumes during the peak hour for each intersection, and the black line (with the red circle) shows the peak hour volumes that would warrant a signal if only considered over a peak-hour period (refer to Figure 4C-3). However, the signal warrant analysis is determined over an 8-hour period. If a signal warrant isn't required for the peak hour, it doesn't meet the requirement for an 8-hour period. In that case, the information for “Warrant 1” isn't provided. None of the studied intersections meet the criteria for a signal. Additionally, the Lead Agency has confirmed the worksheets are legible and technically correct.

Response No. B5-49

The comment suggests that the Draft EIR should have evaluated potential Project-related traffic impacts at the intersections of Atlantic Avenue / Firestone Boulevard and Garfield Avenue / Firestone Boulevard.

The preparers of the Traffic Impact Study (LLG) contacted the City of South Gate during preparation of the Draft EIR to request feedback regarding the potential South Gate intersections to be evaluated in the traffic analysis, and neither of the intersections in Comment No. B5-40 were requested. Steven Itagaki, City Traffic Engineer for the City of South Gate, responded via email on September 12, 2017, with a suggested list of intersections to be evaluated in the Traffic Impact Study. The intersections listed in the email include:

- Gardendale Street / Arizona Avenue
- Gardendale Street / Industrial Avenue
- Gardendale Street / Monroe Avenue
- Garfield Avenue / Monroe Avenue
- Garfield Avenue / Main Street
- Main Street / Industrial Avenue / Arizona Avenue
- Imperial Highway / Garfield Place / Ruchti Road
- Imperial Highway / Wright Road
- Wright Road / Abbott Road / Southbound I-710 Off-Ramp

Each of the requested intersections (and others) were evaluated in the Traffic Impact Study (for example, refer to Table 10-1 in the Traffic Impact Study for the list of South Gate study intersections).

The Draft EIR determined that a quantified LOS analysis of intersections along Firestone Boulevard (e.g. at Atlantic Avenue and Garfield Avenue), which are located approximately two

miles north of the Project Site, were not required. As outlined in Section 7.2 of the Traffic Impact Study, the Project's trip distribution took into account numerous factors to determine how Project traffic volumes entering and exiting the site should be distributed and assigned to the adjacent street system, including: (1) the Site's proximity to major traffic corridors (i.e., Imperial Highway, Gardendale Street, Paramount Boulevard, I-105 Freeway, I-710 Freeway, etc.); (2) expected localized traffic flow patterns based on adjacent roadway channelization and presence of traffic signals; (3) existing intersection traffic volumes (i.e. existing congestion); (4) ingress/egress availability at the Project Site assuming the site access and circulation scheme described in Section 3.0 (of the Traffic Impact Study); (5) the residential zip code data related to current County employees anticipated to work at the Project Site; (6) nearby population and employment centers as well as adjacent residential neighborhoods; and (7) input from LACDPW Traffic and Lighting staff.

The commenter is correct in noting that little Project-related traffic is expected to use Garfield Avenue traveling north from the Project Site. As stated in Response to Comment No. B5-49, no Project-related trips are forecast to travel north on Garfield Avenue from Imperial Highway. As shown on Figure 7-1 in the Traffic Impact Study, Project-related trips on surface streets are primarily assigned to Old River School Road, Paramount Boulevard, and Lakewood Boulevard as these arterials lead to residential neighborhoods to the north of the Project Site, which are expected to be origins and destinations for County employees. By comparison, Garfield Avenue leads to primarily commercial and industrial areas, which would attract fewer Project-related trips. Garfield Avenue generally parallels the I-710 Freeway; therefore, regional trips are assigned to the freeway rather than Garfield Avenue, as shown on Figure 7-1.

As stated in Response to Comment No. B5-2, the Atlantic Avenue and Firestone Boulevard intersection would experience only 5 percent of Project trips (52 AM peak hour trips and 44 PM peak hour trips out of an AM peak of 1,391 trips and a PM peak of 1,357 trips), while the Garfield Avenue and Firestone Boulevard intersection would experience only 2 percent of Project trips (21 AM peak hour trips and 18 PM peak hour trips out of an AM peak of 1,413 trips and a PM peak of 1,685 trips). The trips leaving the Project Site would pass through the Garfield Avenue and Firestone Boulevard intersection traveling west on Firestone Boulevard; as previously mentioned, trips are not assumed to leave the Project Site traveling north on Garfield Avenue.

As shown in Figure 3.11-1 of the Draft EIR (and in Figure 7-1 in the Traffic Impact Study), the two closest intersections evaluated in the Draft EIR to the suggested intersections along Firestone Boulevard are Intersection No. 1 (Atlantic Avenue / Imperial Highway) and Intersection No. 5 (Garfield Avenue / Imperial Highway). From Intersection No. 1, only 5 percent of Project-related trips are forecast to travel north on Atlantic Avenue from Imperial Highway. From Intersection No. 5, no Project-related trips are forecast to travel north on Garfield Avenue from Imperial Highway. In addition, Tables 3.11-6 and 3.11-8 in the Draft EIR indicate that the potential Project-related traffic impacts at Intersection Nos. 1 and 5 would be less than significant in the Existing with Project and Future with Project scenarios. Nevertheless, the Final EIR includes a Supplemental Traffic Analysis (Refer to Appendix H-3 to this Final EIR) that specifically evaluates the potential Project-related traffic impacts at two intersections along Firestone Boulevard: Atlantic Avenue/Firestone Boulevard and Garfield Avenue/Firestone Boulevard. This Supplemental Traffic

Analysis was prepared in response to traffic-related comments received from the City of South Gate on the Draft EIR. As shown in the Supplemental Traffic Analysis, the potential traffic impacts at Atlantic Avenue/Firestone Boulevard and Garfield Avenue/Firestone Boulevard confirm that Project-related impacts in these locations would be less than significant based on the City of South Gate traffic analysis procedures and thresholds of significance. As discussed in Response B5-2, this additional analysis is not grounds for recirculation.

The Draft EIR, the Final EIR, and this response are based upon the expert opinion of LLG, a transportation planning and engineering firm that has been in business domestically and overseas for over 44 years. More specifically, the Traffic Impact Analysis was prepared by David Shender, P.E., who has more than 30 years of experience within the traffic engineering and transportation planning industry, with particular emphasis in the preparation of master planning site access and circulation studies and parking studies and CEQA-related environmental documentation for a variety of projects, with particular focus on the formulation of comprehensive transportation mitigation packages. Mr. Shender is a licensed Civil Engineer with registration in the States of California, Nevada, and the Commonwealth of Pennsylvania. Mr. Shender holds both a Bachelor of Science (BS) degree and a Master of Science (MS) degree in Civil Engineering from Drexel University.

Response No. B5-50

The comment indicates that the Draft EIR did not identify the proposed project's neighborhood traffic impacts on "cut-through traffic" south of Gardendale Street. It also questions trip distribution assumptions and specifically questions trip distribution relative to impacts on Consuelo Street.

Refer to Response to Comment No. B5-46 for a discussion of traffic impacts south of Gardendale Street in the Hollydale area. As also noted in the previous response, the County consulted with the City of South Gate regarding the selection of intersections prior to release of the Draft EIR. Further, the traffic analysis analyzed Project-related trips into and through the Hollydale area by the analysis of Intersections 7 (Garfield Avenue / Monroe Avenue), 8 (Gardendale Street / Monroe Avenue), 9 (Garfield Avenue / Main Street), 15 (Erickson Avenue / Gardendale Street), 17 Arizona Avenue / Gardendale Street), and 18 (Paramount Boulevard / Imperial Highway).

As shown in Figure 7-1 of the Traffic Impact Study, approximately 5 percent of Project-related trips are forecast to utilize Atlantic Avenue north of Imperial Highway (Intersection No. 1) for regional travel. No Project-related trips are forecast to utilize Wright Avenue north of Abbott Road.

Nevertheless, while the County does not believe the trip distribution proposed in the comment is reasonably foreseeable, the Final EIR includes a Supplemental Traffic Analysis that alternatively considers that 15 percent of trips leaving the Project Site would use Consuelo Street. As noted in the comment, a stop sign is provided on the eastbound Consuelo Street approach to its intersection with Paramount Boulevard. As shown in **Final EIR Figure 2-1**, due to a median on Paramount Boulevard in this location, only right-turn lanes from Consuelo Street to Paramount Boulevard southbound are allowed. This median also prohibits left turns into the Project Site

from northbound Paramount Boulevard; the only allowed movement would be a right turn into the Project Site from Paramount Boulevard traveling southbound.

As a result of this alternative trip assignment, the Supplemental Traffic Analysis evaluates potential traffic impacts at the Paramount Boulevard / Puritan Street and Paramount Boulevard / Consuelo Street-Cheyenne Street intersection. In addition, the Supplemental Analysis re-reviews the Paramount Boulevard / Gardendale Street intersection under this alternative assignment. Figure 1 of the Supplemental Analysis shows the alternative trip distribution and assignment under this scenario.

As shown in the Supplemental Traffic Analysis, the potential traffic impacts due to the Project would be less than significant based on the City of South Gate traffic analysis procedures and thresholds of significance at the Paramount Boulevard / Puritan Street and Paramount Boulevard / Consuelo Street-Cheyenne Street intersection, which is the same conclusion for the proposed Project.

This alternative assignment would result in less-than-significant impacts under Future Cumulative with Project conditions at the Paramount Boulevard / Gardendale Street intersection (Intersection No. 20) under the City of South Gate and City of Downey traffic analysis procedures and thresholds of significance, while it would result in significant impacts using the City of Paramount's traffic analysis procedures and thresholds of significance, which were identified as significant for the proposed Project (Draft EIR Tables 3.11-6 and 3.11-8). However, this assignment would require right-only turns into and out of Consuelo Street, a stop-sign controlled intersection, which could result in queuing on eastbound Consuelo Street and southbound Paramount Boulevard, and would also require any traffic traveling northbound on Paramount Boulevard to make a U-turn at Puritan Street to enter the Project site from Consuelo Street, which could also result in queuing. The right-turns from eastbound Consuelo Street to southbound Paramount Boulevard, which is controlled by a stop sign, as well as the U-turn from northbound to southbound Paramount Boulevard at Puritan Street, are traffic movements that rely on motorists to determine sufficient gaps in opposing traffic to complete the turning movement, and may be considered by some drivers to be not as safe as compared to traffic movements made at intersections controlled by traffic signals, which provide protected turning movements. For these reasons, it was assumed that traffic entering and exiting the Project Site would more likely use Erickson Avenue, which will either be a signal-controlled intersection if Mitigation Measure MM-TRA-3 were implemented, as proposed in the Draft EIR, or a stop-sign controlled intersection (without a median on Gardendale Street), which would allow all turning movements into and out of the Project Site, traffic permitting as well complete turning movements at the Paramount Boulevard / Gardendale Street intersection, which is currently controlled by a traffic signal. As discussed in Response to Comment No. B5-2, this additional analysis is not grounds for recirculation. Refer to **Final EIR Figure 2-1** for a figure showing access to and from the Project Site using Consuelo Street and Paramount Boulevard.



SOURCE: Google, 2020; ESA, 2020

Rancho Los Amigos South Campus Project
Final Environmental Impact Report

Final EIR Figure 2-1

Access To and From the Project Site via Consuelo Street



The Traffic Impact Analysis provided in Appendix H to the Draft EIR, as well as the Supplemental Traffic Analysis, provided in Appendix H-3 to this Final EIR, were prepared by LLG, a transportation planning and engineering firm that has been in business domestically and overseas for over 44 years. More specifically, the Traffic Impact Analysis was prepared by David Shender, P.E., who has more than 30 years of experience within the traffic engineering and transportation planning industry, with particular emphasis in the preparation of master planning site access and circulation studies and parking studies and CEQA-related environmental documentation for a variety of projects, with particular focus on the formulation of comprehensive transportation mitigation packages. Mr. Shender is a licensed Civil Engineer with registration in the States of California, Nevada, and the Commonwealth of Pennsylvania. Mr. Shender holds both a Bachelor of Science (BS) degree and a Master of Science (MS) degree in Civil Engineering from Drexel University.

Response No. B5-51

The comment questions why the Project would not produce northbound or southbound trips north of the intersection of Garfield Avenue and Garfield Place or Intersection No. 5 (Garfield Avenue / Imperial Highway).

As stated in Response to Comment No. B5-49, no Project-related trips are forecast to travel north on Garfield Avenue from Imperial Highway. As shown on Figure 7-1 in the Traffic Impact Study, Project-related trips on surface streets are primarily assigned to Old River School Road, Paramount Boulevard, and Lakewood Boulevard as these arterials lead to residential neighborhoods to the north of the Project site, which are expected to be origins and destinations for County employees. By comparison, Garfield Avenue leads to primarily commercial and industrial areas, which would attract fewer Project-related trips. As noted in the comment, Garfield Avenue generally parallels the I-710 Freeway; therefore, regional trips are assigned to the freeway rather than Garfield Avenue, as shown on Figure 7-1.

Refer to Responses to Comment Nos. B5-2, 3 and B5-46 for a discussion of why recirculation of the Draft EIR is not required.

Response No. B5-52

The comment correctly summarizes the impact conclusion for Intersection No. 16 (Erickson Avenue / Gardendale Street) as described in the Draft EIR on pages 3.11-28 and 3.11-29 and shown in Draft EIR Tables 3.11-8 and 3.11-9 (provided on pages 3.11-23 and 3.11-27 of the Draft EIR, respectively).

Refer to Response to Comment No. B5-47 for a detailed discussion of the County's fair share contribution towards the implementation of Mitigation Measures MM TRA-2 and MM TRA-3.

Response No. B5-53

The comment correctly summarizes the impact conclusion for Intersection No. 7 (Garfield Avenue / Monroe Avenue) as described in the Draft EIR on page 3.11-28 and shown in Draft EIR

Tables 3.11-8 and 3.11-9 (provided on pages 3.11-22 and 3.11-27 of the Draft EIR, respectively). To potentially reduce the LOS impact at Intersection 7, the comment also suggests: (1) a raised landscaped median being installed to minimize turning movements; (2) restricting right turn movements from Garfield Avenue (northbound) to Monroe Avenue (eastbound) during AM and PM peak hours; and (3) traffic calming measures on Monroe Avenue (between Garfield Avenue and Gardendale Street).

As stated on page 3.11-28, the potential mitigation measure – the installation of a traffic signal at Garfield Avenue / Monroe Avenue) – was determined not to be required because there are insufficient side-street volumes to warrant the installation of a traffic signal. Traffic signals are considered (or “warranted” for analysis) for unsignalized intersections based on a variety of factors, including multi-hour traffic volumes (4 hour and 8 hour), peak hour traffic volumes, pedestrian traffic, school crossings, coordinated signals, crash experience, roadway networks, and grade crossings. In this case, the traffic warrant would be satisfied if the minor-street traffic suffers undue delay when entering or crossing the major street for a minimum of 1 hour of an average day, expressed as either stopped delay time or traffic volumes. These warrants were not satisfied, and, accordingly, a traffic signal is not required at this location. Therefore, this potential mitigation is considered infeasible due to non-compliance with signal warrants, which represent legal, social, technological and policy factors.

The comment suggests installation of a raised and landscaped median on Garfield Avenue to minimize turning movements, presumably to minimize turning movements from Garfield Avenue traveling south to Monroe Avenue traveling east or from Monroe Avenue traveling west to Garfield Avenue traveling south. Supported by the expert opinion of LLG, this would shift traffic onto other nearby local streets to reach their destination east or west of Garfield Avenue (e.g., Taft Avenue, Jefferson Avenue, and Center Street). In addition, if a raised median were installed, access to Monroe Avenue between Garfield Avenue and Gardendale Street would be restricted, allowing only right-turns from Garfield Avenue traveling northbound or Gardendale Street traveling eastbound. Therefore, this potential mitigation measure is considered infeasible as it would cause secondary adverse impacts by redirecting traffic to other residential streets.

The restriction of right-turn movements from Garfield Avenue (northbound) to Monroe Avenue (eastbound) during the AM and PM peak hour is not considered a feasible mitigation measure because it would similarly cause secondary adverse impacts by redirecting traffic to other residential streets. Further, the installation of speed humps on Monroe Avenue between Garfield Avenue and Gardendale Street would not reduce traffic volumes at the Monroe Avenue / Garfield Avenue intersection; rather, it would potentially reduce the speed of traffic on Monroe Avenue east of Garfield Avenue and potentially adversely affect response times by emergency vehicles.

The measures identified by the commenter are either not feasible and/or would not reduce the significant and unavoidable impact at Intersection No. 7 (Garfield Avenue / Monroe Avenue).

Response No. B5-54

The comment requests a determination as to whether the “road diet” design established by the cities of South Gate and Downey would be adequate for future traffic conditions with the Project and also requests consideration financing requirements of the funding sources to implement the road diet. The comment also requests an analysis of alternative road designs for discussion with the cities of South Gate and Downey.

The “road diet” project referenced in the comment was completed in 2015 and was a joint effort of the cities of Downey, South Gate, and Paramount (Los Angeles Wave Newspapers, 2015). Based on Google Street View photos, Gardendale Street previously provided two through-vehicle travel lanes in each direction. Following implementation of the road diet project, Gardendale Street now provides one through vehicle travel lane in each direction, a center two-way left-turn lane, and one bike lane in each direction. The analysis of traffic impacts associated with implementation of this Project was based on the existing setting at the time the NOP for the Project was issued, which was in August 2017, after implementation of the road diet project (refer to Appendix A of the Draft EIR for a copy of the NOP). Therefore, as noted in the comment and discussed on page 15 of the Traffic Impact Study, Gardendale Street provides one through travel lane in each direction, and the analysis of Project-related traffic impacts is based on this configuration.

Based on the current configuration, Figure 3.11-1 of the Draft EIR indicates the location of the study intersections on Gardendale Street that were evaluated for potential traffic impacts due to the Project, which include Intersection Nos. 6, 8 15, 16, 17, 20, 23, 24 and 26. As shown in Table 3.11-9, four intersections along Gardendale Street are forecast to be significantly impacted by traffic due to the Project: No. 15 (Industrial Avenue / Gardendale Street), No. 16 (Erickson Avenue / Gardendale Street), No. 17 (Arizona Avenue / Gardendale Street), and No. 20 (Paramount Boulevard / Gardendale Street). For all of these intersections, impacts would be significant and unavoidable. Intersection No. 16 (Erickson Avenue / Gardendale Street) provides a feasible mitigation measure; however, its implementation cannot be guaranteed because it involves approval by the cities of South Gate and Downey. For the other intersections along Gardendale Street, no feasible mitigation has been identified that would reduce the level-of-significance impact.

The comment also requests that the Draft EIR “must consider any financing requirements of the funding sources that were used to implement the road diet.” Given that the road diet has been implemented, EIR for this Project is not required to consider financing requirements or funding sources of a separate improvement project that has been implemented.

Refer to Response to Comment No. B5-47 for a detailed discussion of the County’s fair share contribution towards the implementation of Mitigation Measure MM TRA-3 and how the proposed mitigation still results in a significant and unavoidable impact conclusion at Intersection No. 16 (Erickson Avenue / Gardendale Street). Refer also to Responses to Comment Nos. B5-2, B5-3 and B5-46 for a discussion of why recirculation of the Draft EIR is not required.

Response No. B5-55

The comment requests an analysis of impacts to the residential neighborhood to the south of the Project site, including the recommendation for traffic calming measures.

Refer to Response to Comment No. B5-46 for a discussion of the potential traffic effects to the Hollydale area (to the south of the Project Site), as well as the reasons why recirculation of the Draft EIR is not required. Also, the traffic calming measures suggested in the comment are not required because no impact has been identified for Intersection No. 18 (Industrial Avenue-Arizona Avenue / Gardendale Street). Refer also to Response to Comment No. B5-49 for a detailed discussion of how the Project trip distribution and assignment was determined, as well as the Supplemental Traffic Analysis prepared in response to comments provided by the City of South Gate.

Response No. B5-56

The comment asserts that “The County needs to provide safety improvements on Main Street, Arizona Street, and Industrial Avenue such as traffic calming measures. The County must also be responsible for the funding and implementation of the mitigation to repave the streets as a means to mitigate the impacts of traffic.”

The proposed project analyzed traffic safety under Impact TRA-3. Operational impacts under TRA-3 were determined to be less than significant. Refer to Response to Comment No. B5-46 for a discussion of the potential traffic effects to the Hollydale area (to the south of the Project site). Because there are no impacts in this area, no mitigation measures are required, such as safety improvements (e.g., traffic calming measures). Furthermore, the traffic calming measures referenced in the comment would potentially adversely affect response times by emergency vehicles, as discussed in Response to Comment No. B5-53.

Response No. B5-57

The comment mentions the results of an uncited 2018 LOS analysis and requests a revised traffic analysis to account for different trip distribution assumptions.

Table 3.11-6 provides the existing calculated existing LOS at Intersection No. 5 (Garfield Avenue / Imperial Highway). As shown on Table 3.11-6, Intersection No. 5 is calculated to operate at LOS D during the AM peak hour and LOS C during the PM peak hour. As described on page 3.11-2 in the Draft EIR, the existing LOS at the study intersections were determined based on traffic counts conducted in October 2017. The comment does not provide data or analysis to support the assertion that the intersection currently operates at LOS F during the AM and PM peak hours in 2018.

Refer to Response to Comment No. B5-49 for a discussion of the assignment of Project-related trips to Garfield Avenue north of Imperial Highway. The comment does not provide any data or analysis to support its assertion that the trip assignment provided on Figure 7-1 in the Traffic Impact Study is in error.

Response No. B5-58

The comment indicates that a recirculated Draft EIR must include a traffic study that addresses related projects and cumulative traffic impact. Refer to Response to Comment No. B5-3 for a discussion of the related projects and ambient growth factor considered in the cumulative traffic analysis provided in the Draft EIR. The comment does not identify a specific error or flaw regarding the analysis of cumulative traffic impacts provided in the Draft EIR. Therefore, no revisions to the traffic analysis provided in the Draft EIR or a recirculated Draft EIR are required.

With respect to the commenter's request for a recirculated Draft EIR, refer to Responses to Comment Nos. B5-2, B5-3 and B5-46 for a discussion of why recirculation is not necessary.

Response No. B5-59

The comment questions when the construction workers would arrive at the site relative to the AM peak hour of 7:00 AM to 9:00 AM.

As stated on page 3.10-22 of the Draft EIR, construction hours for the Project are assumed to occur between 7:00 AM and 7:00 PM, Monday through Friday, and 8:00 AM to 6:00 PM on Saturday. The comment appears to refer to the discussion of construction trip generation provided in the Draft EIR on pages 3.11-11 and 3.11-12, which states that most construction workers arrive and depart the worksite outside of the commuter peak hours. Most construction workers would arrive at the worksite prior to the start of construction in order to begin work at the earliest permitted time (in this instance, 7:00 AM), prior to the AM peak hour of 7:00 AM to 9:00 AM, and would depart at 7:00 PM, after the peak hour of 4:00 PM to 6:00 PM. To provide a conservative analysis, page 3.10-12 states that the construction analysis assumed that 20 percent of the inbound daily trips would arrive at the Project Site during the AM peak hour and 20 percent of the outbound daily trips would depart the Project Site during the PM peak hour. Therefore, the assumption in the Draft EIR that most construction workers would arrive prior to the start of the morning commuter peak hour is valid.

It should also be noted that while the City of South Gate is challenging the construction traffic analysis, the City of South Gate does not appear to prepare such analyses for its own projects, including the 992 Atlantic Avenue Residential/Commercial Mixed Use Project (LSA, 2018) and the Alta Med Medical Facility Project (Blodgett Baylosis Environmental Planning, 2015).

Refer to Response to Comment Nos. B5-2, B5-3 and B5-46 for a discussion of why recirculation of the Draft EIR is not required.

Response No. B5-60

The comment requests an identification of haul routes within the City of South Gate.

As stated on page 3.10-28 of the Draft EIR, the expected route for haul trucks traveling to and from the Project Site is the I-710 Freeway, Imperial Highway, and Erickson Avenue. Thus, the Draft EIR discloses haul trucks will travel through the City of South Gate via portions of the I-

710 Freeway and Imperial Highway. Page 3.11-15 states that the shoring/excavation phase of Project construction, which includes haul trucks, is forecast to generate far fewer vehicle trips than the operation of the Project following construction and occupancy. Regardless, the Draft EIR determines that construction-related traffic impacts are potentially significant; however, Mitigation Measure MM-TRA-1, provided on page 3.11-16 of the Draft EIR, requires implementation of a construction traffic management plan to alleviate construction period impacts associated with vehicles, pedestrians, and bicyclists in the vicinity of the Project Site. This mitigation measure would reduce construction-related impacts to a less-than-significant level. Further, Mitigation Measure MM-TRA-1 specifically requires regular coordination meetings with the City of South Gate regarding construction activities in the area to address any potential transportation issues that may arise due to concurrent construction activities associated with related projects.

Refer to Responses to Comment Nos. B5-2, B5-3 and B5-46 for a discussion of why recirculation of the Draft EIR is not required.

Response No. B5-61

The comment requests an analysis of left-turn phasing at Garfield Avenue and Paramount Boulevard and further requests that the County is responsible for the funding and implementation of the construction and installation of the traffic signal and mitigation measures.

The comment mentions the intersection of Garfield Avenue and Paramount Boulevard, which do not intersect. The Traffic Impact Study analyzes the intersections of Garfield Avenue / Imperial Highway (Intersection No. 5) and Paramount Boulevard / Imperial Highway (Intersection No. 19). Tables 3.11-6 and 3.11-8 in the Draft EIR summarize the traffic analysis prepared for the Existing with Project and Future with Project conditions, respectively.

To the extent the commenter intended to reference Intersection No. 5 (Garfield Avenue / Imperial Highway) or Intersection No. 19 (Paramount Boulevard / Imperial Highway), as shown in Tables 3.11-6 and 3.11-8, the Project-related traffic impacts at both intersections are determined to be less than significant. Therefore, the traffic signal phasing analysis (to accommodate a signalized left turn), as suggested in the comment, is not required.

Response No. B5-62

The comment questions the date and results of the traffic counts for Intersection No. 27 (Erickson Avenue / Amigos Avenue), which was collected 2018, as compared to the rest of the intersection traffic counts, which were collected in 2017.

Table 5-1 in the Traffic Impact Study, contained in Appendix H of the Draft EIR, provides a summary of the dates of the traffic counts conducted at the study intersections. As shown in Table 5-1, traffic counts at 26 of the 27 intersections were conducted on October 11, 2017. For one intersection – Intersection No. 27 (Erickson Avenue / Amigos Avenue) – the traffic counts were conducted on August 15, 2018.

The comment notes a comparison of traffic arriving and departing at Intersection No. 27 from the nearest study intersection, which is Intersection No. 14 (Erickson Avenue / E. Imperial Highway). The comment suggests that the number of vehicles departing Intersection No. 14 via Erickson Avenue are less than those arriving at Intersection No. 27. However, based on the land uses between the two intersections (e.g., the L.A. County Superior Court building on the west side of Erickson Avenue and an office park on the east side of Erickson Avenue), this is to be expected (i.e., this is a common location to end or start a trip). Figure 5-1 in the Traffic Impact Study, for example, shows 320 AM peak hour vehicles departing Intersection No. 14 via southbound Erickson Avenue and 165 vehicles arriving at Intersection No. 27 via southbound Erickson Avenue. This reduction in vehicles on Erickson Avenue is reasonable based on the relatively high number of vehicles turning into the L.A. County Superior Court and office park driveways. Accordingly, there is no need to adjust the counted traffic volumes at Intersection No. 27 (Erickson Avenue / Amigos Avenue), as suggested in the comment.

Furthermore, as discussed in Response to Comment No. B5-3, the EIR prepared a cumulative analysis, which assumed a one percent annual growth rate, which exceeds the 0.61 percent growth factor provided in the Los Angeles County Congestion Management Program (CMP). Consequently, the cumulative future operational year analysis provides an adjusted analysis similar to that requested in the comment.

Response No. B5-63

The comment mentions four specific items: (1) when were the related projects were approved; (2) why are negative project volumes reflected in Table 6-1 and on figures 6-2 and 6-3; (3) could figures be provided showing the distribution of related projects; and (4) change the word “distribution” to “assignment” in the last sentence.

The approach to the cumulative impact analysis for this Project includes both a list of cumulative projects (or related projects), which are provided in Table 2-7 of Chapter 2, *Project Description*, of the Draft EIR, and an annual growth factor of 1.0 percent annual growth (used specifically for the traffic analysis). (Refer to Response to Comment No. B5-3 for additional details). Pages 2-35 to 2-52 of Chapter 2, *Project Description*, of the Draft EIR describes the approach to the cumulative impact analysis in detail. The list of cumulative (or related) projects was compiled when the NOP was issued, in August 2017. Local agencies, including South Gate, Downey, Paramount, Lynwood, and the County of Los Angeles were also contacted in March 2019 to verify the related projects within their respective jurisdictions and to confirm that no additional projects should be included. No additional projects were added based on the responses received, or in the case of the City of South Gate, no response was received to the query from LLG. This approach is fully consistent with CEQA. (*South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321 [“The City had discretion to determine a reasonable date as a cutoff for which projects to include in the cumulative impacts analysis.”].)

The comment references Table 6-1 and Figures 6-2 and 6-3, which are contained in the Traffic Impact Study provided in Appendix H of the Draft EIR. Table 6-1 provides the trip generation forecast for related projects, and Figures 6-2 and 6-3 display the estimated traffic volumes at the

study intersections attributed to the related projects during the weekday AM and PM peak hours, respectively. The parenthetical numbers shown on Table 6-1 represent the removal of existing peak hour trips on the local street system as a result of the proposed redevelopment of some individual related projects. For example, with related project DO8, 13,405 square feet of commercial uses will be replaced by 12,000 square feet of medical uses, resulting in the elimination of 506 daily trips associated with the commercial uses and the generation of 418 daily trips associated with medical uses. This is notable at related projects LC1 and LC3 shown on Table 6-1, which result in substantial reductions in site-generated vehicle trips. Since these two related projects (i.e., LC1 and LC3) are located close to the Project Site, as shown on Figure 6-1, it is also the reason for negative numbers for some turning movements at the study intersections shown on Figures 6-2 and 6-3. Figures 6-2 and 6-3 provide the distribution of trips for the related projects, for the AM and PM peak hours, respectively, as requested in the comment.

The terms “assignment” and “distribution” used in the Traffic Impact Study to describe the process of transitioning site-generated vehicle traffic for the Project and related projects to the study intersections are interchangeable. While no revision is required, a text change to the Traffic Impact Study has been provided to indicate that the terms “assignment” and “distribution,” as used throughout the report, are interchangeable. This text revision is contained in the Revised Traffic Impact Study, which is provided as Appendix H-2, *Revised Traffic Impact Study*, of this Final EIR. This revision is also provided to page 3.11-14 of the Draft EIR as shown below and is included in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of this Final EIR.

The related projects research was based on information on file at the County of Los Angeles Department of Regional Planning, City of Downey Community Development Department, City of South Gate Community Development Department, and the City of Lynwood Building, Safety and Planning Division. Related project details, including the number of daily and peak hour vehicle trips, for the 31 related projects that would potentially affect traffic conditions in the vicinity of the Project Site are provided in Appendix IH. In total, related projects are estimated to generate 9,232 daily vehicle trip, of which 619 would occur during the AM peak hour and 847 would occur during the PM peak hour. The trip generation, distribution, and assignment for the related projects were estimated using the same methodology described above for the proposed Project. For purposes of this analysis, the terms “distribution” and “assignment” are used interchangeably.

This change merely clarifies the use of two terms, but does not change the analysis or conclusions in the Draft EIR. The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it.

Response No. B5-64

The comment mentions three specific items: (1) identify the existing land uses that will be replaced by new ones; (2) for projects with multiple land uses, provide a subtotal of net project trips; and (3) for project LC1, identify whether the existing hospital open and fully occupied/operational when the traffic counts were collected.

Refer to Response to Comment No. B5-63 for a discussion of the trip generation forecast for the related projects provided in Table 6-1 of the Traffic Impact Study. As requested in the comment, for those related projects that include removal of existing land uses, Table 6-1 indicates the potential reduction of vehicle trips through the use of parenthetical values. The fact that the table does not indicate subtotals of trip generation values for each individual cumulative project does not change the analysis related to the potential trip generation of the cumulative projects. The level of detail demanded by the commenter is not required for cumulative analyses, nor provided in the traffic analyses prepared by the City of South Gate. (Refer to CEQA Guidelines Section 15130(b).)

The comment refers to cumulative project LC1 shown on Table 6-1, which is the Rancho Los Amigos North Campus Site Consolidation project. As discussed in the Traffic Impact Study, the compilation of the list of cumulative projects is done through research conducted with individual jurisdictions, including the County of Los Angeles. The County provided the Ranch Los Amigos North Campus Site Consolidation – Addendum No. 1 to the Environmental Impact Report (October 24, 2012), which provides the basis for the trip generation identified in Table 6-1 of the Traffic Impact Study. The trip generation assumes a reduction of hospital beds by approximately 50 percent (from 396 currently licensed beds to approximately 200 beds), potential Veteran Housing, and a reduction in the overall square footage of development on site. According to the Addendum, the prior hospital building on the LC1 site operated for many years, with construction of the North Campus Site Consolidation project starting around 2015. It is a common analytical approach in a traffic analysis to consider the trip generation associated with existing or allowed uses in determining net new daily trips. As such, no adjustments to the trip generation forecast related to LC1 are required. However, to the extent that the commenter is concerned that the existing trips related to project LC1 might under-represent what could be developed in the future, but is not currently proposed, the Future with Project analysis includes an ambient annual growth factor of 1.0 percent that is attributed to overall regional growth both inside and outside of the transportation study area, which accounts for projects that were not known, and could not be known, when this analysis was prepared.

Response No. B5-65

The comment notes that the trip generation forecast for General Office rates result in fewer trips than the Government Office rates. provided in Table 3.11-5 of the Draft EIR utilizes vehicle trip rates for general office uses. The trip rates for general office uses, or General Office Building, as provided in the *Trip Generation Manual* published by the ITE, were utilized instead of governmental office uses, or Government Office Buildings as provided in the *Trip Generation Manual* published by the ITE, because the Project consists primarily of administrative office uses

rather than public-serving facilities. Public-serving facilities typically include uses such as City Halls or Department of Motor Vehicles, which have considerable visitor traffic and, therefore, result in greater trip generation.

As stated on page 2-22 of the Draft EIR, “While the [Probation Department] Headquarters would serve some visitors, including vendors, contractors, and County staff, the Probation Department’s public-facing services would still occur at other District sites distributed through the County.” Therefore, the use of the General Office Building trip rates provide the most accurate estimation of potential vehicular trip generation of the Project, while Government Office Building trip rates would overstate the trip generation of the Project. In addition, the General Office Building category includes office uses, as well as tenant services, such as restaurant or cafeteria and service retail facilities, and conference spaces. The comment also suggests the use of trip rates from the ITE Trip Generation Manual for the Single Tenant Office Building land use type (Land Use Code 715) instead of the trip rates for the General Office Building land use type (Land Use Code 710) for purposes of forecasting vehicle trips generated by the Project. However, the Project does not match the description of the Single Tenant Office Building described in the Trip Generation Manual. The Trip Generation Manual describes the Single Tenant Office Building as a “... single business or company.” However, as described in Section 2.4.2, Proposed Project, in Chapter 2, *Project Description*, of the Draft EIR, the Project consists of multiple buildings and functions. This includes three separate departments and buildings: ISD Headquarters, Probation Headquarters, and the County Office Building. As further described in Section 2.4.2, there will be multiple functions within each proposed building. The Single Tenant Office Building results in greater densities of employees, resulting in the relatively high trip generation rates noted in the comment.

In addition, the ITE Trip Generation Manual does not provide trip rates under the Single Tenant Office Building land use for the weekday AM and PM peak hours of adjacent street traffic (i.e., 7:00 AM – 9:00 AM and 4:00 PM – 6:00 PM). The trip rates provided in the Trip Generation Manual for the Single Tenant Office Building are for the AM and PM “peak hour of the generator,” which may, or may not, fall within the AM and PM peak hours of 7:00 AM – 9:00 AM and 4:00 PM – 6:00 PM. When applied to this Project, the peak hour of the generator would occur outside of the peak hours of commuter traffic in the adjacent street system. For example, as noted on page 2-20 of the Draft EIR, most employees in the proposed County ISD building (with up to 2,450 employees) would work a shift between 6:00 AM and 6:00 PM on weekdays. This would result in most employee traffic arriving prior to the AM commuter peak period beginning at 7:00 AM and departing after the end of the PM commuter peak period ending at 6:00 PM, which would reduce peak hour impacts. Instead, using the General Office Building land use category, and as noted on page 3.11-2 of the Draft EIR, the traffic analysis evaluates the study intersections during the commuter peak hour periods of 7:00 AM – 9:00 AM and 4:00 PM – 6:00 PM. Therefore, use of the General Office Building land use category would more accurately reflect the trip generation that would occur with a multi-use office building and also allows for an analysis of peak hour impacts.

Refer also to Response to Comment No. B5-3 for a discussion of the use of the General Office Building land use type for the Project’s trip generation.

Response No. B5-66

The comment disputes the interchangeable use of the terms “ICU” (Intersection Capacity Utilization) and “v/c ratio” (volume-to-capacity ratio) as provided in the Traffic Impact Study contained in Appendix H of the Draft EIR. These terms are, in fact, interchangeable because the ICU values provided in the Traffic Impact Study are the result of a calculation of an existing volume of traffic at a study intersection compared to the capacity of the analyzed travel lane group, which is typically assumed to be 1,600 vehicles per lane per hour of traffic signal green time as shown in the appendices provided in the Traffic Impact Study containing the Level of Service calculations. Therefore, no revisions to the use of ICU and v/c terms are required in the Traffic Impact Study. Nevertheless, a text change to the Traffic Impact Study has been provided to indicate that the terms “ICU” and “v/c ratio,” as used throughout the report, are interchangeable. This text revision is contained in the Revised Traffic Impact Study, which is provided as Appendix H-2, *Revised Traffic Impact Study*, of this Final EIR. This revision to page 3.11-2 of the Draft EIR is shown below and is included in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of the Final EIR.

The Intersection Capacity Utilization (ICU) method was used to determine Volume-to-Capacity (v/c) ratios and corresponding Levels of Service (LOS) for the signalized study intersections located within the City of Downey, City of South Gate, City of Paramount, and the County of Los Angeles. For purposes of this traffic impact study, the terms “ICU” and “v/c ratio” are used interchangeably. The Highway Capacity Manual (HCM) method was used to determine Control Delays and corresponding LOS for the unsignalized study intersections.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it. (Refer to CEQA Guidelines Section 15088.5.)

Response No. B5-67

The comment refers to Table 8-2 provided in the Traffic Impact Study contained in Appendix H of the Draft EIR, requesting that the criteria provided in Table 8-2 use the City of Los Angeles’ thresholds for delay, which is for unsignalized intersections. The City of Los Angeles does not have, and has not had, thresholds of significance for unsignalized intersections (i.e., delay). In Table 8-2, the commenter proposes different threshold for determining the significance of impacts for unsignalized intersections, which is not based on thresholds established by the City of Los Angeles. If the Traffic Impact Study had applied the thresholds suggested by Table 8-2 for unsignalized intersections, the same impact conclusions would have been reached for the intersections analyzed for this Project. The ICU thresholds presented in Table 8-2 for signalized intersections are the thresholds used in the Traffic Impact Study for this Project.

As mentioned on page 58 of the Traffic Impact Study, the traffic impact analysis for the 16 study intersections located within the City of South Gate used the ICU methodology for signalized intersections and the Highway Capacity Manual (HCM) methodology (i.e., delay) for unsignalized intersections. For those unsignalized intersections determined by the HCM methodology to operate at LOS E or F, the Intersection Capacity Utilization (ICU) method was used to assess whether Project-related traffic caused a change in the calculated v/c ratio by 0.020 or more. In these instances, a significant traffic impact was identified.

As discussed on page 42 of the Traffic Impact Study, potential traffic impacts at the study intersections were assessed using the traffic analysis and methodologies used in the various jurisdictions within the study area. Thus, intersections located partially or completely within the City of South Gate were analyzed based on the City of South Gate's traffic analysis procedures and thresholds of significance contained in the document entitled Guidelines for Development Traffic Impact Analysis, City of South Gate Department of Public Works, July 13, 2019. There is a footnote provided to Table 8-2 stating that the thresholds of significance applied to intersections located in the City of South Gate are based on this document. Table 10-1 in the Traffic Impact Study provides a summary of the analysis of potential traffic impacts due to Project-related traffic at the study intersections located within the City of South Gate using the City's Guidelines for Development Traffic Impact Analysis.

As the City of South Gate did not suggest specific analysis procedures or thresholds of significance to use in the Draft EIR as part of the NOP, the preparers of the Traffic Impact Study relied on the City's Guidelines document and recent traffic studies prepared for the City of South Gate for other development projects for determining the traffic analysis procedure and thresholds of significance. Specifically, the report entitled Traffic Impact Study - 9325 Long Beach Boulevard Charter School Project, LLG, May 10, 2017, and Traffic Impact Study – 2013 Firestone Educational Center Master Plan, LLG, November 21, 2013, were referenced for the traffic analysis procedures and thresholds of significance to use in the Traffic Impact Study prepared for the Draft EIR.

The Traffic Impact Study contained in the Draft EIR provides an accurate assessment of Project-related traffic impacts at intersections located in the City of South Gate based on recent traffic analyses prepared for the City of South Gate in its own assessment of potential traffic impacts due to a development project within its own jurisdiction, as well as the City of South Gate's Guidelines and commonly accepted practices for the analysis of intersection impacts. Therefore, the suggested revisions provided by the commenter relative to using the City of Los Angeles' thresholds for delay are not required.

Response No. B5-68

The comment refers to the Intersection Capacity Utilization (ICU) worksheets provided in Appendix B through E of the Traffic Impact Study contained in Appendix H of the Draft EIR and requests various revisions.

The study intersection numbers are noted on the ICU worksheets in the heading in the “File” row (e.g., ICU-8 indicates the ICU worksheet for Intersection No. 8). Therefore, the requested information is already provided, and no change is necessary.

Refer to Response to Comment No. B5-66 regarding the interchangeable use of the terms v/c and ICU as used in the Traffic Impact Study.

Refer to Response to Comment No. B5-67 for a discussion of the appropriateness of the methodology used to evaluate Project-related impacts at both signalized and unsignalized intersections.

Response No. B5-69

The comment refers to Table 10-1 provided in Appendix B through E of the Traffic Impact Study contained in Appendix H of the Draft EIR and requests various revisions.

Refer to Response to Comment No. B5-66 regarding the interchangeable use of the terms v/c and ICU as used in the Traffic Impact Study (Items A and B in this comment).

Refer to Response to Comment No. B5-67 for a discussion of the appropriateness of the methodology used to evaluate Project-related impacts at both signalized and unsignalized intersections (Items C and E in this comment).

The comment is correct that Table 10-1 of the Traffic Impact Study shows that the Paramount Boulevard/S. Somerset Ranch Road intersection is mistakenly labeled as Intersection No. 23 instead of Intersection No. 22. This intersection is correctly identified within the Draft EIR (e.g., Table 3.11-8). Nevertheless, a text change to the Traffic Impact Study has been provided to provide the correct intersection number for the Paramount Boulevard/S. Somerset Ranch Road intersection (Item D in this comment). This text revision is contained in the Revised Traffic Impact Study, which is provided as Appendix H-2, *Revised Traffic Impact Study*, of this Final EIR. The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it. (Refer to CEQA Guidelines Section 15088.5.)

The LOS at the study intersections are readily displayed throughout the Traffic Impact Study, as well as in the tables provided in Section 3.11, *Transportation*, of the Draft EIR. Bolding the text for those intersections calculated to operate at LOS E or F is not necessary and would not result in a change in the information conveyed (Item F in this comment). Therefore, no revisions are necessary and would not constitute a significant change in the information conveyed.

Response No. B5-70

The comment references Table 10-1 in the Traffic Impact Study contained in Appendix H to the Draft EIR and requests various revisions.

Table 10-1 provides a summary of the traffic analysis prepared for the study intersections located in the City of South Gate. The comment is correct in that Intersection No. 12 (Old River School Road/Imperial Highway) is incorrectly listed in this table as the intersection is located entirely in the City of Downey. A text change to the Traffic Impact Study has been provided to show the information currently provided in Table 10-1 for Intersection No. 12 (Old River School Road/Imperial Highway) is now provided in Table 9-1, which reflects intersections located in the City of Downey. However, Table 3.11-8 in the Draft EIR correctly notes that Project-related traffic will not cause significant traffic impacts at Intersection No. 12, irrespective of the jurisdiction within which it is located. This text revision is contained in the Revised Traffic Impact Study, which is provided as Appendix H-2, *Revised Traffic Impact Study*, of this Final EIR. The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it.

Response No. B5-71

The comment references the discussion of potential traffic mitigation measures at unsignalized intersections located in the City of South Gate as provided on page 72 of the Traffic Impact Study contained in Appendix H of the Draft EIR. Refer to Response to Comment No. B5-53 for a discussion as to why the limitation of traffic movements as suggested in the comment is not considered a feasible mitigation measure. The suggestion in the comment to limit traffic movements to right-turns in and out from Monroe Avenue is not considered a feasible mitigation measure because it would reduce access to northbound Garfield Avenue, causing secondary adverse impacts by redirecting traffic to other residential streets.

Response No. B5-72

The comment refers to the traffic signal warrants analysis provided in Section 15.0 of the Traffic Impact Study contained in Appendix H of the Draft EIR and suggests a new methodology for traffic signal warrants for new intersections and an analysis that makes it clear at which stage a signal would be warranted, with or without the project.

As stated on page 76 of the Traffic Impact Study, “The traffic signal warrants were prepared based on criteria set forth in Chapter 4C of the *Manual on Uniform Traffic Control Devices (MUTCD)*.” The EIR performed signal warrant analyses for unsignalized intersections using the criteria provided in the MUTCD, with the goal of determining whether signalization might be a required and, further, would be a feasible mitigation measure to reduce potential impacts, if they occurred. As mentioned in Response to Comment No. B5-53, traffic signals are considered (or

“warranted” for analysis) for unsignalized intersections based on a variety of factors, including multi-hour traffic volumes (4 hour and 8 hour), peak hour traffic volumes, pedestrian traffic, school crossings, coordinated signals, crash experience, roadway networks, and grade crossings.

As discussed in Section 15.0 of the Traffic Impact Study, the traffic signal warrants analyses (or calculations) are based on existing traffic volumes and future forecast plus project traffic volumes along all approaches as this represents the highest traffic volume conditions. An analysis of other scenarios with less traffic at the analyzed intersections as suggested in the comment (i.e., existing conditions or future plus Project) is not necessary because if the warrants are not satisfied in the future plus Project condition, they would not be satisfied in scenarios with less traffic.

Furthermore, it is not the purpose of CEQA to fix existing environmental deficiencies (e.g. intersections which already meet existing signal warrants under “existing conditions”).

(*Watsonville Pilots Association v. City of Watsonville* (2010) 183 Cal.App.4th 1059 [“The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope”].)

Response No. B5-73

The comment refers to the intersection of Industrial Avenue/Arizona Avenue/Gardendale Street and then suggests that the County utilize HCM Methodology in lieu of ICU methodology for analysis of traffic congestion at that intersection. However, no such intersection exists. The intersection of Industrial Ave. and Gardendale St. is located approximately 0.20 Miles northwest of the intersection of Gardendale St. and Arizona Ave.

To the extent comment intended to reference Intersection No. 18 (Industrial Avenue-Arizona Avenue/Main Street), the LOS worksheet for Intersection No. 18 (Industrial Avenue-Arizona Avenue/Main Street) is contained in Appendix C of the Traffic Impact Study. Due to the 5-leg configuration of the intersection of Arizona Avenue, Main Street, and Industrial Avenue, as well as the low volumes of traffic, the volumes from the Arizona leg of the intersection were combined with the volumes for the east leg of Main Street in order to conduct the ICU analysis for this multi-street intersection; therefore, the traffic volumes for Arizona Avenue were considered in the ICU analysis. Nevertheless, the County notes the commenters point of disagreement. This methodology is appropriate for these circumstances, based upon the opinion and expertise of LLG, as outlined in Response B5-50.

Refer to Response to Comment No. B5-67 for a discussion of the traffic analysis procedures used for evaluating unsignalized intersections located in the City of South Gate in the Traffic Impact Study.

Response No. B5-74

The commenter asserts that the EIR should be revised and recirculated to add a discussion regarding SB 743, and suggests that discussion note the July 1, 2020 under the revised CEQA Guidelines, and suggests that this EIR should be updated to include such analysis if the project is not approved by that date.

The Draft EIR already includes a discussion of SB 743 on page 3.11-8, which notes the general July 1, 2020 date under CEQA Guidelines Section 15064.3. However, even if the Project is not approved by that date, it has no effect on the applicability of SB743 VMT metrics on the proposed Project. CEQA Guidelines Sections 15064.3(c) and 15007 clearly explain that they apply prospectively (i.e. to “steps in the CEQA process not yet undertaken...If the document meets the content requirements in effect when the document is set out for public review, *the document shall not need to be revised to conform to any new content requirements in guideline amendments taking effect before the document is finally approved.*”).

Response No. B5-75

The comment mentions six specific items: (1) whether LACO Buildings 7000 and 1286 will be demolished; (2) whether “the two other buildings” will be demolished; (3) identify the “third building to remain”; (4) provide a new figure to show the existing and future external site access points/roadways; and (5) reference Figure 4-1 on Page 9. The last comment cross-references Comment #9, which mentions future development within the larger Project area in the comment letter, rather than Intersection No. 12 (Old River School Road / Imperial Highway), which is the header used in this comment.

The commenter appears to be referencing an overview of the existing Project Site and the Project description from the Traffic Impact Study, and not from the Draft EIR. The commenter is referred to the Draft EIR Project Description (Chapter 2 of the Draft EIR), which contains a more in-depth discussion of the existing Project Site and the Project description. More specifically, regarding issues 1 and 2 in the comment, Figure 2-8 of the Draft EIR shows the four buildings and features that would remain after implementation of the proposed Project, which include Buildings 1100, 1238, and 1301, as well as the Moreton Bay Fig Tree; therefore, Buildings 1286 and 7000 would be demolished.

The comment refers to the description of vehicular access to the Project Site as provided on page 8 of the Traffic Impact Study. Figure 2-1 in the Traffic Impact Study provides the site plan for the Project and labels the streets that will provide vehicular access to the Project Site. In addition, refer to Response to Comment No. B5-46 provides a detailed description of access to the Project Site.

The comment suggests adding a reference to Figure 4-1 (of the Traffic Impact Study) on page 9 (of the Traffic Impact Study). A reference to Figure 4-1 is provided in the Traffic Impact Study on page 10; therefore, no text change is required.

To the extent that the commenter’s reference to “Comment #9” refers to Comment B5-70, please refer to Response to Comment No. B5-70 for a discussion regarding the location of the Old River School Road/Imperial Highway intersection in the City of Downey as provided on page 9 of the Traffic Impact Study.

Response No. B5-76

The comment refers to Figure 4-1 in the Traffic Impact Study contained in Appendix H of the Draft EIR and requests several changes.

The first comment suggests that Figure 4-1 be revised to “extend Atlantic Avenue to the north beyond Abbott Road. Figure 4-1 was not intended to provide a full figure roadway map as assumed in the comment, rather Figure 4-1 is intended to show the “Existing Lane Configurations” of the intersections analyzed in the study. The commenter is referred to Figure 1-1 of Appendix H, which shows Atlantic Ave. north of Abbott Road. Additionally, there are no study area intersections on Atlantic Avenue, north of Abbott Road. Further, Somerset Ranch Roads (North and South) do not extend west of Garfield Avenue, and there are no study area intersections North and South of Somerset Ranch Road east of Paramount Boulevard. Refer to Figure 1-1 in the Traffic Impact Study, which provides a detailed map of local streets in the Project vicinity.

The comment also refers to minor changes to intersection configurations or operations at Intersection No. 5 (Garfield Avenue/Imperial Highway) and Intersection No. 8 (Gardendale Street/Monroe Avenue) that have occurred since preparation of the Traffic Impact Study. The traffic analysis was prepared based on conditions that existed at the time the Notice of Preparation was published, which is August 2017 (the NOP is provided in Appendix A of the Draft EIR.) Also, the comment refers to Imperial Highway, but it is likely intended to refer to Gardendale Street.

For Intersection No. 16 (Erickson Avenue/Gardendale Street), the comment states that a de-facto right-turn lane should not be assumed. The traffic analysis does not assume a de-facto right-turn lane on westbound Gardendale Street under existing conditions, as illustrated by Figure 4-1 of the Traffic Impact Study provided in Appendix H to the Draft EIR; however, it is assumed under Future Cumulative With Project Conditions for westbound Gardendale Street at Erickson Avenue. The assumption regarding the de-facto right-turn lane for the westbound Gardendale Street approach to the reopened Erickson Avenue intersection under Future Cumulative With Project Conditions is reasonable because this would be the same operating conditions on Gardendale Street (in terms of a de-facto right-turn lane) that occurs for the other nearby intersections at Dakota Avenue, Industrial Avenue, Arizona Avenue, and Hoover Avenue with eastbound Gardendale Street. That is, the eastbound Gardendale Street approaches to these nearby intersections have existing pavement striping, which encourage eastbound traffic to merge out of the through lane to the de-facto right-turn lanes prior to completing the right-turns onto the aforementioned streets. Therefore, it would be expected that the roadway striping on the westbound approach of Gardendale Street to the reopened Erickson Avenue intersection would operate in a similar manner.

To provide a conservative analysis, de-facto right-turn lanes were not assumed under Future Cumulative With Project Conditions on the eastbound approaches of Gardendale Street to the Industrial Avenue and Arizona Avenue intersections in the Traffic Impact Study (Intersection Nos. 15 and 17, respectively) because street parking is provided adjacent to the residential units located on the south side of Gardendale Street. However, as there are no residential units on the

north side of Gardendale Street in the vicinity of the Erickson Avenue intersection, street parking would not be needed on the north side of Gardendale Street.

As shown in Table 3.11-8, *Future with Project Conditions Intersection Levels of Service*, of the Draft EIR, and Table 3.11-9, *Mitigated Intersection Levels of Service Intersection*, would result in a significant impact. If the de-facto right-turn lane was not assumed under Future Cumulative With Project Conditions, the significant impact would remain. However, street parking would be prohibited on the Gardendale Street intersection once it is restriped. It is acknowledged on page 3.11-29 of Section 3.11, *Transportation*, of the Draft EIR that modifications to the Erickson Avenue/Gardendale Street intersection are beyond the control of the County of Los Angeles. For this reason, a significant and unavoidable impact is identified at this intersection due to the Project. Therefore, modifying the traffic analysis to not include the de-facto right-turn lane would not change the finding regarding significant traffic impacts due to the Project.

Response No. B5-77

The comment provides various suggested edits to the text provided in Section 4.3, Roadway Descriptions, of the Traffic Impact Study contained in Appendix H of the Draft EIR. The discussion provided in Section 4.3 is for informational purposes only and does not affect the quantitative analysis of potential traffic impacts provided in the Traffic Impact Study. Nevertheless, text changes to the Traffic Impact Study to reflect the correct roadway descriptions have been provided as indicated below. These revisions are contained in the Revised Traffic Impact Study, which is provided as Appendix H-2, *Revised Traffic Impact Study*, of this Final EIR.

- Ruchti Road will be noted as a Local Road.
- Garfield Place will be noted as a Local Road
- The description for Garfield Avenue will note a separate right-turn lane at Imperial Highway.
- Industrial Avenue will be noted as a Local Road
- Arizona Avenue will be noted as a Local Road
- The description for Paramount Boulevard will note a center two-way left-turn lane.
- The description for Imperial Highway will note a center two-way left-turn lane.
- The Imperial Highway/Garfield Avenue intersection will be noted as an Enhanced Intersection in the City of South Gate's Mobility Element.
- Abbott Road will be noted as a Local Road.
- The description for Abbott Road will note a center two-way left-turn lane.
- The correct speed limits for Abbott Road will be noted.
- Gardendale Street will be noted as a Collector Street.
- The description for Gardendale Street will note a center two-way left-turn lane.
- Monroe Avenue will be noted as a Local Road.

- The correct speed limits for Main Street will be noted.
- N. Somerset Ranch Road will be noted as a Local Road.
- The description for N. Somerset Ranch Road will note access to the I-105 Freeway westbound ramps.
- S. Somerset Ranch Road will be noted as a Local Road.
- The description for S. Somerset Ranch Road will note access to the I-105 Freeway westbound ramps.
- Intersection No. 17 will be added to the 2nd paragraph, 1st sentence, in Section 14.2 (page 72) to reflect it is also stop-sign controlled.

The proposed text changes do not require recirculation of the EIR because they do not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it.

Refer to Response to Comment No. B5-66 regarding the interchangeable use of the terms v/c and ICU as used in the Traffic Impact Study.

With respect to the description of Wright Road, the commenter correctly notes that portions of Wright Road are 2 lanes in each direction near the intersection of the I-710 SB Off-Ramp / Abbott Road.

In the commenter's comment #82, they cross-reference their comment #9, which is contained in Response to Comment No. B5-13. Comment #82 mentions Old River School Road. However, comment #9 does not address Old River School Road; instead, that particular comment questions how much development will potentially occur on the remaining 39 acres of the broader Rancho Los Amigos site. To the extent that the commenter's reference to "Comment #9" refers to Comment No. B5-70, please refer to Response to Comment No. B5-70 for a discussion regarding the location of the Old River School Road.

Lastly, in their "comment #95," the commenter cross-references their comment #10, which is contained in Response to Comment No. B5-14. Comment #95 references a section of the Traffic Impact Study that discusses significant and unavoidable Project-related impacts at Intersection Nos. 7, 15, and 17. Comment #10 addresses the specificity of the Project Description. No further response can be provided.

Response No. B5-78

The comment refers to the discussion of the traffic signal warrants analysis provided in Section 15.0 of the Traffic Impact Study contained in Appendix H of the Draft EIR. While the comment suggests various text changes, they do not affect the analysis of traffic signal warrants provided in the Traffic Impact Study. Nevertheless, a text change to the Traffic Impact Study has been provided to add intersection numbers to the intersection names in the discussion of traffic signal

warrants. These revisions are contained in the Revised Traffic Impact Study, which is provided as Appendix H-2, *Revised Traffic Impact Study*, of this Final EIR.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it. With respect to Item B in this comment, the text of the Traffic Impact Study states that the stop signs face the side street approach for Monroe Avenue, Industrial Avenue, Erickson Avenue, and Arizona Avenue, which means that the stop signs are located “on” these side streets.

With respect to Item C, as the commenter notes and as reflected in the text of the Traffic Impact Study, Garfield is the major street.

With respect to Item D, the commenter correctly notes that the side streets (Industrial Avenue, Erickson Avenue, and Arizona Avenue) “T” into Gardendale Street.

Response No. B5-79

While the comment suggests various text changes related to adding intersection numbers to intersection names and changing heading titles, they do not affect quantitative analysis or conclusions provided in the Traffic Impact Study. Nevertheless, text changes to the Traffic Impact Study have been provided to add intersection numbers to the intersection names in the discussion of traffic signal warrants; to revise Section 17.2.1 to add “Project” in the heading title, such that it reads “Future Cumulative Without Project Conditions;” and to revise Section 17.2.2 to change “Without” to “With” and add “Project” in the heading title, such that it reads “Future Cumulative With Project Conditions.” These revisions are contained in the Revised Traffic Impact Study, which is provided as Appendix H-2, *Revised Traffic Impact Study*, of this Final EIR.

The proposed text changes do not require recirculation of the EIR because they do not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it.

The comment refers to Section 16.3, Transit Impact Review, provided in the Traffic Impact Study contained in Appendix H of the Draft EIR. As no changes are proposed to be made to the vehicle trip generation forecast prepared for the Project (Table 3.11-5 of the Draft EIR) in response to comments on the Draft EIR, no revisions are required to the Transit Impact Review section provided in the Traffic Impact Study. Refer to Responses to Comment Nos. B5-3 and B5-65 for a discussion of Project-related trip generation and Response to Comment No. B5-63 for a discussion of trip generation for related (or cumulative) projects.

The comment appears to refer to Section 18.1, Construction Assumptions, contained in Section 18.0, Construction Impact Assessment, provided in the Traffic Impact Study contained in Appendix H of the Draft EIR. As stated on page 90 of the Traffic Impact Study and page 3.10-22 of the Draft EIR, construction hours for the Project would occur between 7:00 AM and 7:00 PM, Monday through Friday, and 8:00 AM to 6:00 PM on Saturday. However, as stated on pages 3.11-11 and 3.11-12, and also discussed in Response to Comment No. B5-69, most construction workers will arrive and depart the worksite outside of the commuter peak hours. Most construction workers would arrive at the worksite prior to the start of construction in order to begin work at the earliest permitted time (in this instance, 7:00 AM), prior to the AM peak hour of 7:00 AM to 9:00 AM, and would depart at 7:00 PM, after the peak hour of 4:00 PM to 6:00 PM. To provide a conservative analysis, page 3.10-12 states that the construction analysis assumed that 20 percent of the inbound daily trips would arrive at the Project Site during the AM peak hour and 20 percent of the outbound daily trips would depart the Project Site during the PM peak hour. As concluded on page 3.11-15, construction of the Project with a start time of 7:00 AM would not result in a significant traffic impact. Therefore, there is no need to delay the start of construction to 8:30 AM or 9:00 AM, as suggested in the comment, to avoid or reduce a significant impact.

Refer to Response to Comment No. B5-60 for a discussion of the construction haul routes assumed in the Draft EIR. In summary, as stated on page 3.10-28 of the Draft EIR, the expected route for haul trucks traveling to and from the Project Site is the I-710 Freeway, Imperial Highway, and Erickson Avenue.

Lastly, the commenter's comment #97, they cross-reference their comment #11, which is contained in Response to Comment No. B5-15. Comment #97 addresses the traffic signal warrant analysis. Comment #11 discusses open space and landscaping. Therefore, while no specific response can be provided, refer to Responses to Comment Nos. B5-48, B5-53, and B5-72 for specific responses to other comments on the traffic signal warrant analysis.

Response No. B5-80

With respect to transit service and bicycles, page 3.11-15 states that "... construction activities could still cause delay and unsafe conditions for vehicles, pedestrians, and bicyclists in the vicinity of the Project Site." In response, the Draft EIR recommends Mitigation Measure TRA-1 on page 3.11-16, which requires the preparation of a Construction Traffic Management Plan to address conditions related to construction parking, traffic controls, safety precautions, and adequate emergency access. The Construction Traffic Management Plan would alleviate potentially adverse effects related to construction of the Project to pedestrians and vehicles, including transit vehicles. In addition, the commenter correctly references page 3.11-25 for the discussion of construction-related impacts to transit and bicycle facilities.

The comment suggests that the construction analysis provided in the Traffic Impact Study is not consistent with the Draft EIR. The Draft EIR provides additional CEQA analysis, including the recommendation of Mitigation Measure TRA-1. Neither CEQA nor case law requires that the text of technical documents precisely match the Draft EIR analysis; in fact, quite often, the analysis in

an EIR is expanded to evaluate CEQA or Lead Agency thresholds of significance and/or feasible mitigation measures. Therefore, changes to the Traffic Impact Study are not required.

The commenter references page 3.11-6, but provides no information on the alleged inconsistencies between Appendix H, and the Draft EIR transportation analysis. Page 3.11-6 addresses operational intersection levels of service under Existing with Project conditions; therefore, it is assumed that the commenter is addressing operational impacts. The conclusions presented on page 94 of the Traffic Impact Study are consistent with Table 3.11-8 of the Draft EIR, provided on pages 3.11-22 to 3.11-24, which show intersection levels of service impact conclusions under the Future with Project Conditions.

The MMRP, which will be provided to the Board of Supervisors when considering approval of the Project, will be based on the mitigation measures presented in the Draft EIR, and is the document that ensures all feasible mitigation measures will be implemented as a condition of development.

Response No. B5-81

Refer to Response to Comment No. B5-67 for a discussion regarding the traffic analysis procedures used for evaluating Project-related traffic impacts at signalized and unsignalized intersections, including those located in the City of South Gate, as provided in the Traffic Impact Study. Further, contrary to the statement in the comment, it is the HCM method (not the ICU method) that is used to establish operations (Levels of Service) at the study intersections, which is what is reported in Table 10-1 of the Traffic Impact Study.

The comment refers to the Intersection Capacity Utilization (ICU) worksheets provided in Appendix B through E in the Traffic Impact Study contained in Appendix H of the Draft EIR. The study intersection numbers are noted on the ICU worksheets in the heading in the “File” row (e.g., ICU-8 indicates the ICU worksheet is for Intersection No. 8).

In addition, the ICU worksheet for Intersection No. 16 are provided in the Traffic Impact Study. It is located on PDF pages 209 and 210, which are in Appendix B of Appendix H.

Response No. B5-82

Refer to Response to Comment No. B5-66 regarding the interchangeable use of the terms v/c and ICU as used in the Traffic Impact Study.

Response No. B5-83

The comment requests a correction to the page 3.11-2 to change the table heading that currently states, “Delay or V/C” to state “Delay, ICU or V/C.” Refer to Response to Comment No. B5-66 regarding the interchangeable use of the terms v/c and ICU as used in the Traffic Impact Study.

Response No. B5-84

The comment requests corrections to the page 3.11-11 and refers to a prior comment provided in its letter (“TIS Comments 5 and 6); however, it is unclear to which comment this refers. Therefore, no further response can be provided.

Refer to Response to Comment No. B5-67 for a discussion regarding the traffic analysis procedures used for evaluating Project-related traffic impacts at signalized and unsignalized intersections, including those located in the City of South Gate, as provided in the Traffic Impact Study.

Response No. B5-85

The comment requests an update based on the Revised Traffic Impact Study and refers to a prior comment provided in its letter (“TIS Comment 4”); however, it is unclear to which comment this refers. Therefore, no further response can be provided.

Response No. B5-86

The comment requests analysis of existing conditions on page 3.11-14 of the Draft EIR. The list provided on pages 3.11-14 and 3.11-15 of the Draft EIR describes the traffic conditions that were evaluated in the traffic analysis (Existing with Project, Future Cumulative without Project, and Future Cumulative with Project). Existing LOS are provided in Table 3.11-6.

Additionally, the comment requests an update to the values under Future Cumulative without Project Conditions based on a Revised Traffic Impact Study. The commenter provides no evidence in this comment, or elsewhere in the comments, that necessitates an update to the Traffic Impact Study.

Lastly, the comment refers to a prior comment provided in its letter (“TIS Comment 2”); however, it is unclear to which comment this refers. Therefore, no further response can be provided.

Response No. B5-87

The comment refers to a prior comment provided in its letter (“TIS Comment 4”); however, it is unclear to which comment this refers. Therefore, no further response can be provided. The commenter also alleges an inconsistency between the TIS construction LOS analysis on page 93 versus the analysis on page 3.11-15 of Section 3.11, Transportation, of the Draft EIR. The commenter misrepresents the significance conclusions, and there is no inconsistency. Appendix H, page 93 analyzes construction trip generation and concludes that “construction activity at the project site would generate significantly fewer trips than the operation of the project following its completion.” This is consistent with page 3.11-15 in the Draft EIR, which also concludes that the construction trip generation would be substantially less than the project’s operational trips. However, the EIR analysis went one step further and considered qualitative factors beyond just LOS. Consequently, both analyses are consistent, although the Draft EIR considered other

factors in reaching its significance conclusion. In order to make the Draft EIR entirely consistent with the Revised Traffic Impact Study, a text change is proposed on page 3.11-15 of the Draft EIR to continue to affirm that construction activities could be significant, but would add text indicating that implementation of TRA-1 would reduce impacts to a less-than-significant level. This revision to page 3.11-15 of the Draft EIR is shown below and is included in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of the Final EIR.

As shown above in Table 3.11-5, operation of the proposed Project is forecast to generate 7,443 vehicle trips during a typical weekday, including 1,038 AM peak hour trips and 884 PM peak hour trips. By comparison, the shoring/excavation phase is estimated to generate 160 daily trips, 28 AM peak hour trips and six PM peak hour trips, while the building construction phase is estimated to generate 1,420 daily trips, 142 AM peak hour trips and 138 PM peak hour trips. In other words, construction activity at the Project Site would generate far fewer trips than the operation of the proposed Project following its completion. The potential transportation impacts related to construction would be substantially less as compared to the proposed Project's operational trips due to the lower trip generation associated with construction as compared to proposed Project operations. However, despite the lower trip generation, construction activities could still cause delay and unsafe conditions for vehicles, pedestrians, and bicyclists in the vicinity of the Project Site. Impacts to a project plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities could ~~would~~ be potentially significant during construction and demolition activities; however, MM-TRA-1 requires implementation of a Construction Traffic Management Plan, which would, in relevant part, provide pedestrian and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways; implement safety precautions for pedestrians and bicyclists, schedule construction-related deliveries and haul trips to occur outside commuter peak hours; and ensure adequate emergency access. With implementation of MM-TRA-1 construction-related impacts would be reduced to a less-than-significant level.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it.

Refer to Response to Comment No. B5-80 for a discussion of the construction-related analysis of Project traffic impacts provided in the Draft EIR.

Response No. B5-88

The comment states construction mitigation measures are not in the traffic impact study and refers to a prior comment provided in its letter ("Draft EIR Comment 2"); however, it is unclear to which comment this refers. Therefore, no further response can be provided related to

“Comment 2.” Refer to Response to Comment No. B5-80 for a discussion of the construction-related analysis of Project traffic impacts.

Response No. B5-89

The comment refers to page 3.11-19 of the Draft EIR and requests clarification as to whether the section about SB 743 is relevant. The commenter appears to be referencing the language quoted below from page 3.11-1 of the Draft EIR regarding feasibility of intersection improvements/mitigation measures. This language does not state that VMT is an analytical metric for the EIR (Refer to Response to Comment No. B5-74), rather this language acknowledges that the intersection mitigation measures proposed in the EIR pose competing policy interests for the agencies implementing the improvements. This includes policies considered under SB 743 and AB 1358, the Complete Streets Act, which requires General Plan’s to consider all modes of transportation. Consequently, while VMT metrics are not applicable to this Project under CEQA, policy considerations within these Bills will certainly be considered by public agencies when deciding whether they desire to implement the proposed intersection improvements/mitigation measures. (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957 [mitigation measures may be determined to be infeasible if they are “undesirable from a policy standpoint.”].)

As stated on page 3.11-19 of the Draft EIR: Where deemed to be reasonable and feasible, transportation mitigation measures have been proposed to mitigate the intersection impacts identified above. However, due to the County’s lack of authority to implement intersection improvements in the local jurisdictions where the affected intersections are located, and uncertainty as to whether the local jurisdictions will agree to implement the intersection improvements, the intersection impacts would remain significant and unavoidable. Furthermore, there are competing policy interest regarding LOS improvements which must be made by the surrounding jurisdictions, as acknowledged under Senate Bill 743: “It is the intent of the Legislature to balance the need for level of service standards for traffic with the need to build infill housing and mixed use commercial developments within walking distance of mass transit facilities, downtowns, and town centers and to provide greater flexibility to local governments to balance these sometimes competing needs” (Gov. Code § 65088.4(a); see also AB 1358 [2008].) The proposed mitigation measures are described in detail at the end of this chapter.

Response No. B5-90

The comment refers to a prior comment provided in its letter (“DEIR EA Comment 8”); however, it is unclear to which comment this refers. Therefore, no further response can be provided.

Response No. B5-91

The comment requests text edits to Table 3.11-7 on page 3.11-21 of the Draft EIR.

In response to the comment, text changes to the Draft EIR have been provided, as indicated below, to indicate that the sentence refers to Future Cumulative without Project Conditions, rather than existing conditions. These edits would not change the analysis, findings or conclusions provided in

the document. This revision to page 3.11-21 of the Draft EIR is shown below and is included in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of the Final EIR.

As shown in the table, 22 of the study intersections ~~currently~~ operate at LOS D or better under Future Cumulative without Project Conditions, while the following five intersections operate at LOS E or LOS F during one or both evaluated peak hours:

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it.

Response No. B5-92

The comment requests text edits to the paragraph on page 3.11-22 as well as to the column headings of Table 3.11-8 in the Draft EIR.

Refer to Response to Comment No. B5-3 for a discussion of the interchangeability of terms that refer to “future” traffic conditions. Refer to Response to No. B5-66 regarding the interchangeable use of the terms v/c and ICU as used in the Traffic Impact Study.

With respect to the column headings for Table 3.11-8, a text change will be provided to modify the headings to reflect Future Cumulative Without Project and Future Cumulative With Project, rather than Future Baseline Conditions and Future Cumulative With Project. This revision to Table 3.11-8 on page 3.11-22 of the Draft EIR is shown below and is included in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of this Final EIR.

TABLE 3.11-8
FUTURE CUMULATIVE WITH PROJECT CONDITIONS INTERSECTION LEVELS OF SERVICE

No.	Intersection	Peak Hour	Future <u>Cumulative</u> <u>Without Project</u> Baseline Conditions		Future <u>Cumulative</u> <u>with Project</u> Conditions		Change in V/C	Significant Impact
			Delay or V/C	LOS	Delay or V/C	LOS		

This revision to column headings does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it.

Response No. B5-93

The comment requests various edits or clarifications to pages 3.11-25 through 3.11-33.

Refer to Response to Comment No. B5-80 for a discussion of the construction-related analysis of Project traffic impacts provided in the Draft EIR. Please refer to Response to Comment No. B5-80 for discussion of why not all information included in the EIR needs to be incorporated into Appendix H.

With respect to the discussion of transit trips provided on page 3.11-26, the comment does not provide substantial evidence supporting a revision to this analysis; therefore, there are no revisions to the Traffic Impact Study or Draft EIR with respect to this information.

The comment refers to a prior comment provided in its letter (“DEIR EA Comment 12”); however, it is unclear to which comment this refers. Therefore, no further response can be provided.

The commenter correctly indicates the fourth paragraph on page 3.11-31 should be revised to state that all Project roadways and driveways will be designed to comply with County of Los Angeles standards, rather than LADOT standards, since the Project is under the control of the County of Los Angeles. In response to the comment, a text change to the Draft EIR has been provided as indicated below. This revision to page 3.11-31 of the Draft EIR is shown below and is included in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of the Final EIR.

All Project roadways and driveways would be designed to comply with ~~LADOT~~ County of Los Angeles standards. The driveways would not require the removal or relocation of existing transit stops, and would be designed and configured to avoid potential conflicts with transit services and pedestrian traffic.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project proponents decline to adopt it.

Refer to Response to Comment No. B5-3 for a discussion of the related projects considered in the analysis of cumulative traffic impacts provided in the Draft EIR.

Response No. B5-94

This comment states that the Draft EIR does not address the Kizh Nation’s assessment for the site or the recommended mitigation. Consultation conversations with the Kizh Nation indicated that the Project Site has a high sensitivity for the presence of unknown, subsurface archaeological resources. However, the Kizh Nation representatives did not identify any known tribal cultural resources (as defined in Public Resources Code Section 21074) within the Project Site. Following consultation, the County confirmed that no resource potentially qualifying as a “Tribal Cultural Resource” as defined in Public Resources Code Section 21074 has been identified within or adjacent to the Project Site. The potential for encountering archaeological resources is addressed in Section 3.4, *Cultural Resources*), which reflects consultation and information received from the Kizh Nation on mitigation. Please refer to Mitigation Measures MM-CUL-2c and MM-CUL-4, which discusses the preparation of a Cultural Resources Mitigation and Monitoring Program

that accounts for procedures related to cultural resources and the unanticipated discovery of human remains, respectively. Based on information established during the AB 52 consultation, and as documented in the Draft EIR, no further revisions are necessary.

Response No. B5-95

This comment states that the Draft EIR does not accurately list the related projects and the cumulative impacts on water and wastewater systems. As stated on page 3.13-19 of Section 3.13, *Utilities and Service Systems*, of the Draft EIR, all cumulative projects would be required to comply with all applicable laws and regulations related to water and wastewater demand and generation. Adherence to laws and regulations would ensure that neither the proposed Project nor other cumulative projects would result in water demand or wastewater generation. With regard to water demand, projects that would require a Water Supply Assessment (WSA) in conformance with the 2015 Urban Water Management Plan (UWMP) would evaluate the reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed, on a project-by-project basis. Any new water facilities would undergo separate environmental review and require compliance with all applicable County and City water supply ordinances, laws, and regulations. Each applicant also must fund the costs of the water-related infrastructure needed to serve a particular site, including wastewater. Water supply and wastewater service providers would be required to account for both Project-specific and cumulative projects that would utilize the same facilities. Therefore, the information requested is sufficiently addressed in the Draft EIR.

Response No. B5-96

This comment states that the Draft EIR does not include an alternative off-site location for the Project and that no surveys or studies were completed as part of the Draft EIR's preparation.

Page 4-11 of Chapter 4, *Alternatives*, provides an analysis of an off-site alternative and also references the Gensler 2015 Feasibility Study, which describes various existing and off-site County facilities that would not be able to handle expansion or utilization. In summary, and as stated on page 4-11, the probation Department Headquarters could not be relocated to the current ISD Headquarters because the space is not sufficient to accommodate both Departments. Further, the site configuration would not allow a larger facility and adequate parking and the surrounding property is constructed on a landfill, which may pose additional expansion constraints.

With respect to other County-owned land, and as also stated on page 4-11, the County has identified no available County-owned land – other than the Rancho Los Amigos South Campus - sufficient to house the ISD Headquarters, Probation Department Headquarters, and County Office facilities in a single area, consistent with the Project aim to consolidate the three facilities into one location.

Response No. B5-97

This comment states that the alternatives addressed in the Draft EIR do not address shade and shadow impacts through increasing building setbacks and reducing building heights. Alternative 2

(Partial Preservation Alternative) and Alternative 4 (Adaptive Reuse/Reduced Project Alternative) would both eliminate shade and shadow impacts as indicated on pages 4-27 and 4-57, respectively. Refer also to Response to Comment No. B5-26 for a discussion of the shade and shadow analysis completed for the proposed Project. The Final EIR includes a modified alternative that addresses setbacks to nearby residences. In Alternative 4 Scenario 2, the ISD/Probation Parking Structure would be setback at least 118 feet from the eastern Project Site boundary to provide an increased distance between the new development and the nearby residential neighborhood east of the Project Site as compared to the Project. Please refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and corresponding aesthetic analysis.

The comment also reiterates the commenter's concern regarding directing traffic towards Gardendale Street. By restricting access to Gardendale Street, all Project access and egress would need to travel to Imperial Highway via Erickson Avenue and Old River School Road, rather than splitting project access and egress to both Imperial Highway and Gardendale Street. If this alternative were pursued, all traffic leaving the site would need to make a left turn on Erickson Avenue, creating queuing impacts within the Project site; similarly, entering the Project Site, all traffic would need to make a right turn from Erickson into the Project Site, also creating queuing impacts. Any alternative that provides only one point of access and egress would create more and different traffic impacts, which would still require improvements outside of the County's control and would not reduce the number of significant intersection impacts.

Response No. B5-98

This comment requests that the first paragraph of Chapter 5, *Other CEQA Considerations*, should reference the Statement of Findings of Overriding Considerations that must be made as part of the Final EIR's certification by the Board. The mentioned paragraph specifically references the description of significant and unavoidable environmental impacts; therefore, a reference to a Statement of Findings of Overriding Considerations is not appropriate in this location. However, the Findings and Statement of Overriding Considerations will be presented in a separate document that will be submitted to the County with the Final EIR.

Response No. B5-99

This comment states that growth inducing impacts from the City of Downey's Specific Plan Update (also referred to as the City of Downey Rancho Los Amigos South Campus Specific Plan) should be evaluated in the Draft EIR. Refer to Response to Comment No. B5-3 for a thorough discussion of the status of future development in the South Campus area.

Growth inducing impacts are discussed in Section 5.2, *Growth Inducement*, of the Draft EIR on pages 5-4 to 5-5 of the Draft EIR.

Response No. B5-100

This comment also provides a conclusion to the commenter's letter, and no specific response is required.

Letter C1

Long Beach Heritage
Cheryl Perry, President
Louise Ivers, Vice President for Advocacy
Sarah Locke, Executive Director
1837 East 6th Street
Long Beach, CA 90802
Letter dated November 18, 2019

Response No. C1-1

The County thanks Long Beach Heritage for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment serves as an introduction to the remainder of the comment letter. This comment also requests that the County adopt Alternative 4 (Adaptive Reuse/Reduced Project) rather than the proposed Project, citing an interest in adaptively reusing buildings as County offices. The Project and all alternatives analyzed in the Final EIR include a range of options related to new construction, demolition, rehabilitation and reuse, and preservation (e.g., mothballing) and each will be considered by the Los Angeles County Board of Supervisors in determining whether to approve the proposed Project or an alternative to the proposed Project analyzed in the EIR.

The commenter specifically suggests that Alternative 4 Scenario 1 is approved, which would adaptively reuse or mothball additional buildings in the historic district as compared to the proposed Project. In response to various comments provided on the Draft EIR as well as further analysis conducted by the County, this Final EIR includes a modified Alternative 4 (Scenario 2), which would also include the adaptive reuse of additional buildings as compared to the proposed Project (Refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). Under Alternative 4 Scenario 2, a portion of the proposed County uses would be relocated into selected existing Individually Eligible buildings within the District which would be adaptively reused, in addition to the new construction proposed under the Project. Specifically, Alternative 4 Scenario 2 would adaptively reuse two Individually Eligible Primary Contributors to include various components of the proposed County uses: (1) LACO No. 1238 (Casa Consuelo) and (2) LACO No. 1300 (Power Plant). LACO No. 1301 (Water Tower), an Individually Eligible Primary Contributor, would be restored, repainted, and seismically upgraded. While it would not be operational upon restoration, the Water Tower would remain on the Project Site and continue to serve as a focal point for the South Campus. LACO No. 1302 (Shop & Laundry), an Individually Eligible Primary Contributor, would be mothballed for future County use. No funding or uses are identified at this time, and this scenario only includes retaining and mothballing the structure. In addition, the Moreton Bay Fig and LACO No. 1100, which is currently occupied by the LASD Professional Standards Division will continue to remain in operation in the same manner. In

summary, under Alternative 4 Scenario 2, a total of six of 61 District Contributors would be retained either through adaptive reuse, restoration, mothballing, or retention.

In addition to the buildings to be retained, adaptively reused where indicated, and mothballed, this scenario would also build new construction in the Development Area as proposed under the Project. Similar to the Project, this scenario would construct 650,000 square feet of developed floor area for the ISD Headquarters, Probation Department Headquarters, and County Office Building to accommodate 3,000 employees. This scenario would also develop the ISD/Probation Parking Structure and County Office Parking Structure, as well as all necessary infrastructure improvements.

The County Board of Supervisors will consider each of the alternatives presented in the Draft EIR, as well as Alternative 4 Scenario 2 presented in the Final EIR, when making their final decision on Project approval.

Response No. C1-2

This comment states that the proposed Project would construct three high-rise office buildings and two parking structures, which would remove 57 of the 61 contributing structures and result in the demolition of 94 percent of the Rancho Los Amigos Historic District (District). In addition, the commenter suggests that the many of the buildings on the Project Site, can be brought up to current building code standards and adaptively reused, rather than be demolished.

The commenter is correct in the description of the Project characteristics noted, including the number of buildings/structures and the removal of 57 of 61 contributing structures. The commenter also suggests that many of the buildings can be brought up to current building code standards and adaptively reused.

The Draft EIR considered two alternatives that include the adaptive reuse of various buildings. As discussed in Chapter 4, *Alternatives*, of the Draft EIR, adaptive reuse was considered for the Rehabilitation Alternative and two scenarios of an Adaptive Reuse/Reduced Project Alternative. In addition, as further discussed in Response to Comment No. C3-7, a new alternative has been identified that would increase adaptive reuse and preservation opportunities on the Project Site as compared to the proposed Project, while providing for new construction.

With regard to the Rehabilitation Alternative, two scenarios were considered. Under the first scenario, the District's Individually eligible resources and the Primary Contributors would be adaptively reused for County office uses, while the Secondary Contributors would be mothballed. Under the second scenario, the Individual Resources, Primary Contributors, and Secondary Contributors would all be rehabilitated and adaptively reused for office uses.

Scenario 1 of the Rehabilitation Alternative was rejected as infeasible on pages 4-16 and 4-17 of the Draft EIR. While the "spirit and intent" of historic preservation would be met by Scenario 1 of the Rehabilitation Alternative for the some of the District's resources including the Individual Resources and Primary Contributors that are of highest cultural value, none of the Secondary Contributors would be adaptively reused and they would continue to be susceptible to

deterioration, intrusion and vandalism. Furthermore, none of the other County's Project Objectives would be met. In addition, this Rehabilitation Alternative would be extremely costly to implement and would also incur on-going maintenance, repair and security expenses associated with mothballing. As shown below in **Table C3-2**, the cost of adaptively reusing the Primary Contributors would be \$186,781,000, and the cost of mothballing the Secondary Contributors would be \$5,853,000, resulting in a total cost for Scenario 1 of the Rehabilitation Alternative to \$192,634,000.

Scenario 2 of the Rehabilitation Alternative was similarly rejected as infeasible on page 4-17 of the Draft EIR. Like Scenario 1, Scenario 2 would meet the "spirit and intent" of historic preservation. However, Scenario 2 would cost more than \$178 to \$218 million in 2007 dollars (and more now) and would require County uses to be installed in approximately 35 separate rehabilitated historic buildings, which would conflict with the majority of the County's Project Objectives. As shown below in **Table C3-2**, the cost of adaptively reusing both the Primary and Secondary Contributors would be \$462,197,000.

The Adaptive Reuse/Reduced Project (Alternative 4 Scenario 1) would locate a portion of the County uses into 12 selected Primary and Secondary Contributors that may feasibly accommodate the change in use and would be adaptively reused with no new building construction, while all remaining Primary and Secondary Contributors would be mothballed, as described on pages 4-53 to 4-72 of Chapter 4, *Alternatives*, of the Draft EIR.

Since circulation of the Draft EIR, the County has prepared the 2020 Feasibility Study, provided in Appendix L to this Final EIR, which found that all evaluated structures have experienced substantial deterioration since the 2007-2009 Feasibility Studies cited in the Draft EIR due to time, weather, arson-related fires, seismic activity, high winds, water intrusions, soil settlement, and vandalism, which makes rehabilitation and reuse more difficult and costly. In addition, as documented in the 2020 Feasibility Study and discussed above, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural, seismic, and architectural upgrades to bring the historic buildings into serviceable use as required for compliance with Building Codes, as well as seismic, ADA, and Title 24 requirements. Additionally, the majority of the buildings on the South Campus are not good candidates for reuse of County uses because of the lack of sufficient square footage and open floor plans needed to ensure operational efficiency. The County carefully considered whether it would be possible to reuse the two-story wards along Erikson Avenue (LACO Nos. 1184-1188); however, rehabilitating these buildings would result in locating County uses in multiple buildings and thereby fractioning work units, which is contrary to the objective of facilitating proximate and efficient inter-departmental and cross-sector collaboration and providing proximity to other surrounding County facilities. They are also seismically unsafe and lacking infrastructure for elevators, ADA access, and ADA facilities. In addition, unreinforced masonry buildings are inferior structural systems that would require extensive structure upgrades to meet Building Codes. There would also be security and maintenance challenges due to large spread of buildings across the South Campus. Multiple security guards would be required to man multiple buildings, and each building would have multiple entries to monitor, as opposed to the new construction with one secured manned entry per building. Lastly, the daylight in the historic buildings would be restricted to existing small

windows, which would produce a less desirable work space for employees with limited natural lighting, in contrast to the floor to ceiling glass in the new construction, which would produce a more desirable work space for employees with more natural lighting (Hedge, 2018). The 2020 Feasibility Study provided the County with up-to-date information on the various resources in the Historic District to inform findings regarding the feasibility/infeasibility of the various Project alternatives and mitigation measures considered in the EIR with regard to cost, architectural considerations, structural considerations, and ability/inability to meet Project Objectives.

An additional alternative scenario (Alternative 4 Scenario 2) has been evaluated in this Final EIR in response to the Los Angeles Conservancy's comments. This new alternative would relocate a portion of the proposed County uses into selected existing Individually Eligible buildings within the District, which would be adaptively reused, in addition to the new construction proposed under the Project. Refer to Response to Comment No. C3-7 and Chapter 4, *Alternative 4 Scenario 2*, of this Final EIR for a detailed description of this new alternative.

Response No. C1-3

This comment states that even with implementation of mitigation measures, impacts would remain significant and unavoidable. This conclusion is consistent with the analysis provided in Section 3.4, *Cultural Resources*, of the Draft EIR. The commenter also states that it is not sufficient to only retain those buildings that are individually eligible for listing in the National Register, further concluding that any loss of resources will compromise the collective character of the site as a whole.

With respect to the retention of the District, pages 4-5 through 4-6 of Chapter 4, *Alternatives*, of the Draft EIR states that “[t]he demolition of contributors, whether they be primary, secondary, or tertiary, would adversely affect the integrity of the District. While retention of Key Contributors (all Primary and Secondary Contributors) would allow the District to continue to convey its historic significance because representative examples of each building type would remain and the majority of contributors that comprise the District would be preserved, demolition of Tertiary Contributors would still have an adverse impact on the District’s integrity; however, adverse impacts due to demolition of the Tertiary Contributors would not detract substantially from the eligibility of the District as a historical resource.” Therefore, retention of all Primary and Secondary Contributors would allow the District to continue to convey its historic significance. Page 4-9 of the Draft EIR summarizes potentially feasible alternatives to the Project that would preserve all Primary and Secondary Contributors and/or repurpose buildings for new uses, as mentioned by the commenter, and preserve the eligibility of the District as a historical resource. These potentially feasible alternatives include the No Project Alternative, Partial Preservation Alternative (Alternative 2 Scenario 1⁸), and Adaptive Reuse/Reduced Project Alternative (Alternative 4) as described in the Draft EIR.

⁸ Under Alternative 2 Scenario 2, which is also evaluated in the Draft EIR, while all 23 Primary Contributors would be retained, none of the 17 Secondary Contributors would be retained; therefore, under this alternative, the District would not continue to convey its historic significance.

The No Project Alternative would retain the District in its entirety and avoid any new construction or demolition, as described on Draft pages 4-18 to 4-24. Scenario 1 of the Partial Preservation Alternative (Alternative 2) would retain and mothball all Primary and Secondary Contributors as described on pages 4-24 to 4-39 of the Draft EIR. The Adaptive Reuse/Reduced Project (Alternative 4) would locate a portion of the County uses into 12 selected Primary and Secondary Contributors that may feasibly accommodate the change in use and would be adaptively reused with no new building construction, while all remaining Primary and Secondary Contributors would be mothballed, as described on pages 4-53 to 4-72 of the Draft EIR. However, as described in the referenced pages of the Draft EIR, none of these alternatives would meet all or most of the identified Project Objectives.

In addition, three alternatives that would retain the historic significance of the District and/or repurpose buildings were evaluated, but rejected as infeasible, prior to detailed analysis in the Draft EIR. These alternatives include the Offsite Alternative, Full Preservation Alternative, and the Rehabilitation Alternative (both scenarios), each of which is presented and discussed on pages 4-10 through 4-18 of the Draft EIR. However, none of these alternatives were considered feasible for a variety of reasons, as further demonstrated in the referenced pages of the Draft EIR. As defined on page 4-11, feasibility is defined in CEQA as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors” (Public Resources Code Section 21061.1). CEQA Guidelines Section 15126.6(f) specifies factors that may be taken into account when addressing the feasibility of alternatives; these factors include site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries and whether the proponent can reasonably acquire, control, or otherwise have access to an alternative site.

Response No. C1-4

This comment states that the District meets several criteria that are listed in the National Register (Secretary of the Interior) Standards, including Criterion A, Criterion C, and Criterion D. An analysis was provided in Section 3.4, *Cultural Resources*, of the Draft EIR, as supported by the Rancho Los Amigos Historic District Analysis Report, which is included as Appendix D-1 of the Draft EIR. Appendix D-1 indicates that the District was found eligible for listing in the National Register under Criterion A and Criterion C; however, the District did not meet Criterion D, as indicated by this comment. As indicated on page 81 of the Rancho Los Amigos Historic District Analysis Report, provided as Appendix D-1 of the Draft EIR, the District is not eligible under Criterion D as the District has not yielded and is not likely to yield significant information that would expand our current knowledge or theories of design, methods of construction, operation, or other information that is not already documented in other primary or secondary resource material. The architectural types and conditions of all buildings in the District have been adequately evaluated in the Draft EIR, including the Site Plan, which is identified as a contributor to the District. Threshold (a) of the CEQA Guidelines serves as a threshold from which to determine the significance of potential impacts; it is not a requirement that is violated, as indicated by the commenter. However, the commenter is correct in indicating that much of the original landscaping currently exists, at least from the late 1920s/early 1930s.

Response No. C1-5

This comment is a conclusion to the comment letter and reiterates the commenter's support for Alternative 4 (Scenario 1) with respect to the adaptive reuse of contributing structures. Detailed responses to the desire for adaptive reuse are provided in Responses to Comment Nos. C1-2 through C1-4.

Letter C2

Pasadena Heritage
Susan N. Mossman, Executive Director
Andrew Salimian, Preservation Director
651 South St. John Avenue
Pasadena, CA 91105-2913
Letter dated November 18, 2019

Response No. C2-1

The County thanks Pasadena Heritage for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment serves as an introduction to the remainder of the comment letter and indicates that the commenter can only support a development that utilizes adaptive reuse and preservation of the significant historic resources for the Project Site. Specifically, the comment recommends stronger preservation-focused alternatives.

Detailed responses to the remainder of the comment letter are provided in Responses to Comment Nos. C2-2 through C2-6. It should also be noted that, based upon comments received on the Draft EIR, the Final EIR evaluates an additional alternative (Alternative 4 Scenario 2) that would relocate a portion of the proposed County uses into selected existing Individually Eligible buildings within the District, which would be adaptively reused, in addition to the new construction proposed under the Project. Further details regarding the new alternative scenario are provided below and in Responses to Comment Nos. C3-7, C3-11, and Chapter 4, *Alternative 4 Scenario 2*, of this Final EIR.

Response No. C2-2

These comments and the County's responses will be submitted to the Los Angeles County Board of Supervisors for consideration prior to their final decision on the Project.

This comment requests that many of the buildings on the Project Site are excellent candidates for adaptive reuse due to their condition, flexible floor plans, and ample square footage. The commenter also states that the costs for adaptive reuse would be equal to or less than the cost of new construction.

The Draft EIR considered two alternatives that include the adaptive reuse of various buildings. As discussed in Chapter 4, *Alternatives*, of the Draft EIR, adaptive reuse was considered for the Rehabilitation Alternative and two scenarios of an Adaptive Reuse/Reduced Project Alternative. In addition, as further discussed in Response to Comment No. C3-7, a new alternative has been identified that would increase adaptive reuse and preservation opportunities on the Project Site as compared to the proposed Project, while providing for new construction.

With regard to the Rehabilitation Alternative, two scenarios were considered. Under the first scenario, the District's Individually eligible resources and the Primary Contributors would be adaptively reused for County office uses, while the Secondary Contributors would be mothballed. Under the second scenario, the Individual Resources, Primary Contributors, and Secondary Contributors would all be rehabilitated and adaptively reused for office uses.

Scenario 1 of the Rehabilitation Alternative was rejected as infeasible on pages 4-16 and 4-17 of the Draft EIR. While the "spirit and intent" of historic preservation would be met by Scenario 1 of the Rehabilitation Alternative for the some of the District's resources including the Individual Resources and Primary Contributors that are of highest cultural value, none of the Secondary Contributors would be adaptively reused and they would continue to be susceptible to deterioration, intrusion and vandalism. Furthermore, none of the other County's Project Objectives would be met. In addition, this Rehabilitation Alternative would be extremely costly to implement and would also incur on-going maintenance, repair and security expenses associated with mothballing. As shown below in **Table C3-2**, the cost of adaptively reusing the Primary Contributors would be \$186,781,000, and the cost of mothballing the Secondary Contributors would be \$5,853,000, resulting in a total cost for Scenario 1 of the Rehabilitation Alternative to \$192,634,000.

In summary, while the "spirit and intent" of historic preservation would be met by both scenarios one and scenario two of the Rehabilitation Alternative, for the some of the District's resources including the Individual Resources and Primary Contributors that are of highest cultural value, none of the Secondary Contributors would be adaptively reused (under the first scenario), most of the County's Project Objectives would be met. Since this Rehabilitation Alternative, under both scenarios, would be extremely costly to implement, would not achieve most of the County's objectives, and also would incur on-going maintenance, repair and security expenses associated with mothballing (under the first scenario), the Draft EIR determined that the County would not proceed with implementing the project under the Rehabilitation Alternative, for both scenarios. Therefore, scenario one and scenario two of the Rehabilitation Alternative was considered infeasible and was not further analyzed in the Draft EIR.

The Adaptive Reuse/Reduced Project (Alternative 4 Scenario 1) would locate a portion of the County uses into 12 selected Primary and Secondary Contributors that may feasibly accommodate the change in use and would be adaptively reused with no new building construction, while all remaining Primary and Secondary Contributors would be mothballed, as described on pages 4-53 to 4-72 of the Draft EIR. This alternative would retain a total of 40 District Contributors. However, as stated on page 4-71, this alternative would not satisfy some of the Project Objectives, but would meet other Project Objectives, although to a lesser extent than the Project.

Since circulation of the Draft EIR, the County has prepared the 2020 Feasibility Study, provided in Appendix L to this Final EIR, which found that all evaluated structures have experienced substantial deterioration since the 2007-2009 Feasibility Studies cited in the Draft EIR due to time, weather, arson-related fires, seismic activity, high winds, water intrusions, soil settlement, and vandalism, which makes rehabilitation and reuse more difficult and costly. In addition, as

documented in the 2020 Feasibility Study and discussed above, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural, seismic, and architectural upgrades to bring the historic buildings into serviceable use as required for compliance with Building Codes, as well as seismic, ADA, and Title 24 requirements. Additionally, the majority of the buildings on the South Campus are not good candidates for reuse of County uses because of the lack of sufficient square footage and open floor plans needed to ensure operational efficiency. The County carefully considered whether it would be possible to reuse the two-story wards along Erikson Avenue (LACO Nos. 1184-1188); however, rehabilitating these buildings would result in locating County uses in multiple buildings and thereby fractioning work units, which is contrary to the objective of facilitating proximate and efficient inter-departmental and cross-sector collaboration and providing proximity to other surrounding County facilities. They are also seismically unsafe and lacking infrastructure for elevators, ADA access, and ADA facilities. In addition, unreinforced masonry buildings are inferior structural systems that would require extensive structure upgrades to meet Building Codes. There would also be security and maintenance challenges due to large spread of buildings across the South Campus. Multiple security guards would be required to man multiple buildings, and each building would have multiple entries to monitor, as opposed to the new construction with one secured manned entry per building. Lastly, the daylight in the historic buildings would be restricted to existing small windows, which would produce a less desirable work space for employees with limited natural lighting, in contrast to the floor to ceiling glass in the new construction, which would produce a more desirable work space for employees with more natural lighting (Hedge, 2018). The 2020 Feasibility Study provided the County with up-to-date information on the various resources in the Historic District to inform findings regarding the feasibility/infeasibility of the various Project alternatives and mitigation measures considered in the EIR with regard to cost, architectural considerations, structural considerations, and ability/inability to meet Project Objectives.

An additional alternative scenario (Alternative 4 Scenario 2) has been evaluated in this Final EIR in response to the Los Angeles Conservancy's comments. This new alternative would relocate a portion of the proposed County uses into selected existing Individually Eligible buildings within the District, which would be adaptively reused, in addition to the new construction proposed under the Project. Refer to Response to Comment No. C3-7 and Chapter 4, *Alternative 4 Scenario 2*, of this Final EIR for a detailed description of this new alternative.

Under Alternative 4 Scenario 2, a portion of the proposed County uses would be relocated into selected existing Individually Eligible buildings within the District which would be adaptively reused, in addition to the new construction proposed under the Project. Specifically, Alternative 4 Scenario 2 would adaptively reuse two Individually Eligible Primary Contributors to include various components of the proposed County uses: (1) LACO No. 1238 (Casa Consuelo) and (2) LACO No. 1300 (Power Plant). LACO No. 1301 (Water Tower), an Individually Eligible Primary Contributor, would be restored, repainted, and seismically upgraded. While it would not be operational upon restoration, the Water Tower would remain on the Project Site and continue to serve as a focal point for the South Campus. LACO No. 1302 (Shop & Laundry), an Individually Eligible Primary Contributor, would be mothballed for future County use. No funding or uses are identified at this time, and this scenario only includes retaining and mothballing the structure. In addition, the Moreton Bay Fig and LACO No. 1100, which is

currently occupied by the LASD Professional Standards Division will continue to remain in operation in the same manner. In summary, under Alternative 4 Scenario 2, a total of six of 61 District Contributors would be retained either through adaptive reuse, restoration, mothballing, or retention.

In addition to the buildings to be retained, adaptively reused where indicated, and mothballed, this scenario would also build new construction in the Development Area as proposed under the Project. Similar to the Project, this scenario would construct 650,000 square feet of developed floor area for the ISD Headquarters, Probation Department Headquarters, and County Office Building to accommodate 3,000 employees. This scenario would also develop the ISD/Probation Parking Structure and County Office Parking Structure, as well as all necessary infrastructure improvements.

The County Board of Supervisors will consider each of the alternatives presented in the Draft EIR, as well as Alternative 4 Scenario 2 presented in the Final EIR, when making their final decision on Project approval.

Regarding the comment that the Draft EIR “estimates fairly reasonable construction costs for adaptive reuse, which [the commenter] believe[s] are equal to or less than that of new construction,” While the costs of adaptive reuse may be equal to or less than new construction, there are other considerations that render adaptive reuse a less desirable option, including operational inefficiencies (e.g., lack of sufficient square footage and proximate building locations), security and maintenance challenges, ADA access, and Title 24 considerations.

Response No. C2-3

This comment suggests that buildings not adaptively reused should be mothballed. The Draft EIR analyzes three alternatives that consider mothballing: Alternative 2 (Partial Preservation, both scenarios); Alternative 3 (Reduced Demolition); and Alternative 4 (Adaptive Reuse/Reduced Project Alternative, both scenarios). The Draft EIR also considered two alternatives that were rejected as infeasible for the specific reasons set forth on pages 4-15 to 4-18 of the Draft EIR that also included mothballing: the Full Preservation Alternative and the Rehabilitation Alternative (both scenarios).

In addition to and in support of these alternatives that consider mothballing as suggested by the commenter, a Focused Feasibility Study (Harlan et al., 2020), was prepared as part of this Final EIR to address the current requirements and costs of moth balling historical resources. Please refer to Response to Comment No. C3-3 regarding the information obtained from these studies with respect to mothballing.

Response No. C2-4

This comment states that without proper mothballing, widespread deterioration and vandalism have occurred on the Rancho Los Amigos South Campus. The commenter cites the arson of the 1915 Harriman Residence and requests that this building be reconstructed as part of the mitigation included for the Draft EIR.

As shown in Table 3.4-2, Non-Contributing Buildings and Features, in Section 3.4, *Cultural Resources*, of the Draft EIR, evaluation of the Superintendent’s Residence/Harriman Residence (LACO No. 1101) determined that this structure no longer retains integrity due to destruction by fire on June 26, 2017, and as a result, it is an ineligible non-contributing building to the District; therefore, no mitigation specific to its proposed demolition is required. This conclusion is also documented in the Rancho Los Amigos Historic District Analysis Report included in Appendix D-1 of the Draft EIR on pages 110 to 114, which states that the fire substantially damaged and destroyed character-defining features of the Superintendent’s Residence/Harriman Residence (LACO No. 1101) such that it is no longer a distinctive or recognizable example of a Craftsman style residence. However, the Superintendent’s Residence/Harriman Residence (LACO No. 1101) was previously recorded in a Historic American Buildings Survey (HABS) report along with the other contributing buildings in the District. Furthermore, Mitigation Measure MM-CUL-1a requires a Historic American Landscape Survey (HALS) Standard Format documentation of the District’s contributing Site Plan to record the current conditions prior to construction of the Project. In addition, Mitigation Measure MM-CUL-1b requires development and implementation of a publicly accessible Interpretive and Commemorative Program that will capture and incorporate the important cultural history, associations, and significance of the Rancho Los Amigos Historic District. Because of the prior recordation of the Superintendent’s Residence/Harriman Residence (LACO No. 1101) in a HABS report, high quality images and measured drawings documenting the former appearance are available for the Interpretive and Commemorative Program required by Mitigation Measure MM-CUL-1b.

Response No. C2-5

This comment states that the increased number of parking spaces would encourage more drivers to the Project Site. The comment further recommends a shuttle or vanpool service for the employees of the Project to the Lakewood Avenue Metro Station to reduce the amount of required parking, greenhouse gas (GHG) emissions, and traffic.

Project-related trips are generated by the number of employees, rather than the number of parking spaces, as stated on page 3.11-3 in Section 3.11, *Transportation and Circulation*, of the Draft EIR. Nonetheless, the commenter is correct in noting that there will be additional trips as a result of this Project. Section 3.11 describes the Project-related traffic impacts, concluding that there will be significant and unavoidable impacts to 6 of the 22 studied intersections. The commenter specifically notes that traffic along Imperial Highway comes to a “standstill.” Of the 8 intersections studied along Imperial Highway (Intersections Nos. 1, 3, 4, 5, 12, 13, 19, and 25), only one of those intersections would result in a significant and unavoidable impact (Intersection No. 3, Wright Road /Imperial Highway). For Intersection No. 3, MMR-TRA-2 has been identified to reduce the impact to a less-than-significant level. However, because the intersection is under the joint jurisdiction of the City of South Gate and the City of Lynwood, and the improvement involves a policy decision by these agencies, the County cannot guarantee that those jurisdictions will agree with implementation of this mitigation measure. Therefore, the impact was determined to remain significant and unavoidable.

As described in Chapter 2, *Project Description*, of the Draft EIR, the 2,692 parking spaces provided by the proposed Project are based on 80 percent of employee headcounts, with an additional one percent of the headcount for visitor parking, which is the anticipated parking demand for the proposed Project. In addition, as described further in Chapter 2, *Project Description*, of the Draft EIR, a minimum of six percent of the required parking spaces would be designated as electric vehicle charging stations for both the surface parking and the parking garage. Eight percent of the required parking spaces would be assigned to low emitting, fuel efficient, carpool/van pool vehicles. Additionally, the parking structure would provide secure bicycle parking for five percent of the tenant vehicular parking spaces (2,140 spaces) and five percent of the visitor parking spaces (27 spaces) for a total of approximately 108 bicycle parking spaces. The provision of dedicated parking spaces for low emitting, fuel efficient, carpool/van pool vehicles and bicycle parking spaces would serve to reduce emissions of GHG.

In addition, as discussed in Section 3.2, *Air Quality*, of this Draft EIR, the proposed Project would implement Mitigation Measure MM-AIR-5, which requires preparation of a Transportation Design Management (TDM) program detailing a variety of strategies that would reduce the use of single occupant vehicles (SOV) by employees by increasing the number of trips by walking, bicycle, carpool, vanpool, and transit, which would reduce Project-related GHG emissions and traffic impacts.

Response No. C2-6

This comment indicates that adaptive reuse combined with new construction in place of non-contributing buildings could accommodate all necessary programming on the Project site. The commenter also recommends that the County work directly with the Los Angeles Conservancy to come up with viable alternatives that preserve the historic campus while also serving the needs of the County.

Refer above to Response to Comment No. C2-2 for a discussion of the various alternatives that evaluated adaptive reuse opportunities for the Project site. In addition, refer to Response to Comment Nos. C3-1 through C3-14 for responses to comments provided by the Los Angeles Conservancy. In addition, as noted in Responses to Comments Nos. C3-5 and C3-13 to the Los Angeles Conservancy, the County and Los Angeles Conservancy have worked together throughout this environmental review process to develop and evaluate alternatives to the Project.

This comment also expresses support for the Los Angeles Conservancy's position on the Project and indicates a willingness to assist in any discussions that may improve the Project, providing relevant contact information. This comment is noted.

Letter C3

Los Angeles Conservancy
Adrian Scott Fine, Director of Advocacy
523 West Sixth Street, Suite 826
Los Angeles, CA 90014
Letter dated November 21, 2019
Received on November 21, 2019

Response No. C3-1

The County thanks the Los Angeles Conservancy (the Conservancy) for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment serves as an introduction to the accompanying comment letter provided by the Conservancy. It references the attached supporting documents including Exhibits A through C (various photographs and a map), Attachment A (June 27, 2018, correspondence), and Attachment B (December 21, 2017, comments on the Notice of Preparation [NOP] for the Rancho Los Amigos South Campus Project), all of which have been received and reviewed by the County. Detailed responses to the remainder of the comment letter and attachment are provided below in Responses to Comment Nos. C3-2 through C3-14 below.

Response No. C3-2

This comment acknowledges receipt of the Draft EIR and references an additional letter from Chatten-Brown, Carstens & Minter, LLP, which is submitted as the Conservancy's representation and responded to separately as Comment Letter No. C5. This comment provides background regarding the Conservancy's historical involvement in working with the County regarding the future of the Rancho Los Amigos South Campus. The comment further indicates a preference for retention of the Historic District (herein referred to as the District) and repurposing of the buildings for new uses, while also suggesting that there is a "win-win" scenario where both preservation and new construction is possible. It also presents an observation regarding the deteriorated condition of contributing buildings within the District and the challenges that the County has faced regarding the safety and condition of buildings.

With respect to the retention of the District, pages 4-5 through 4-6 of Chapter 4, *Alternatives*, of the Draft EIR states that "[t]he demolition of contributors, whether they be primary, secondary, or tertiary, would adversely affect the integrity of the District. While retention of Key Contributors (all Primary and Secondary Contributors) would allow the District to continue to convey its historic significance because representative examples of each building type would remain and the majority of contributors that comprise the District would be preserved, demolition of Tertiary Contributors would still have an adverse impact on the District's integrity; however, adverse

impacts due to demolition of the Tertiary Contributors would not detract substantially from the eligibility of the District as a historical resource.” Therefore, retention of all Primary and Secondary Contributors would allow the District to continue to convey its historic significance. Page 4-9 of the Draft EIR summarizes potentially feasible alternatives to the Project that would preserve all Primary and Secondary Contributors and/or repurpose buildings for new uses, as mentioned by the commenter, and preserve the eligibility of the District as a historical resource. These potentially feasible alternatives include the No Project Alternative, Partial Preservation Alternative (Alternative 2 Scenario 1⁹), and Adaptive Reuse/Reduced Project Alternative (Alternative 4) as described in the Draft EIR.

The No Project Alternative would retain the District in its entirety and avoid any new construction or demolition, as described on pages 4-18 to 4-24. Scenario 1 of the Partial Preservation Alternative (Alternative 2) would retain and mothball all Primary and Secondary Contributors as described on pages 4-24 to 4-39. The Adaptive Reuse/Reduced Project (Alternative 4) would locate a portion of the County uses into 12 selected Primary and Secondary Contributors that may feasibly accommodate the change in use and would be adaptively reused with no new building construction, while all remaining Primary and Secondary Contributors would be mothballed, as described on pages 4-53 to 4-72. However, as described in the referenced pages of the Draft EIR, none of these alternatives would meet all or most of the identified Project Objectives.

In addition, three alternatives that would retain the historic significance of the District and/or repurpose buildings were evaluated, but rejected as infeasible, prior to detailed analysis in the Draft EIR. These alternatives include the Offsite Alternative, Full Preservation Alternative, and the Rehabilitation Alternative (both scenarios), each of which is briefly presented and discussed on pages 4-10 through 4-18. However, none of these alternatives were considered feasible for a variety of reasons, as further demonstrated in the referenced pages of the Draft EIR. As defined on page 4-11, feasibility is defined in CEQA as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors” (Public Resources Code Section 21061.1). As further described in CEQA Guidelines Section 15126.6(f), among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

Lastly, in response to the commenter’s suggestion that there is a “win-win” scenario that would allow for both preservation and new construction, a new scenario (Scenario 2) of Alternative 4

⁹ Under Alternative 2 Scenario 2, which is also evaluated in the Draft EIR, while all 23 Primary Contributors would be retained, none of the 17 Secondary Contributors would be retained; therefore, under this alternative, the District would not continue to convey its historic significance.

(Adaptive Reuse/Reduced Project Alternative) has been evaluated in this Final EIR and is described below in Response to Comment No. C3-7.

Refer also to Response to Comment No. C3-5 for a further discussion of preservation and reuse alternatives that were evaluated in the Draft EIR.

Response No. C3-3

This comment references the County's expressed concerns regarding the ongoing security and maintenance costs in overseeing the existing facility, going on to state that these are the County's reasons to justify the wholesale demolition of the District. The commenter also asserts that there is no analysis provided in the Draft EIR that substantiates that buildings are beyond repair or reuse and, therefore, must be demolished and that there is no recent analysis that substantiates how infeasibility was ascertained.

As described on page 4-15 of the Draft EIR, a study to determine the feasibility of rehabilitating and adaptively reusing historic buildings, structures, and features within the Rancho Los Amigos Historic District was prepared between 2007 and 2009. This feasibility assessment was prepared in conjunction with a previously proposed County Data Center at Rancho Los Amigos project that was never approved (Sapphos, 2007-2009). As stated on page 49 of Appendix D-1 (Rancho Los Amigos Historic District Analysis Report) of the Draft EIR, the survey also served to update results from two previous historic surveys, in 1995 by HRG, and in 2004 by Post/Hazeltine.

The Rancho Los Amigos Historic District Tier 1- 4 Feasibility Studies (2007-2009 Feasibility Studies) focused on potential reuse of existing buildings and concluded that each of the buildings selected for reuse would require substantial structural and seismic upgrades, as well as the replacement or repair of architectural features and materials. The 2007-2009 Feasibility Studies also noted the presence of debris, mold, and hazardous materials throughout the buildings and recommended a variety of improvements, including replacement of all mechanical, plumbing, and electrical systems, repair or replacement in kind of all windows and doors, renovation of restrooms with ADA accessible male and female facilities, and addition of elevators in compliance with ADA standards.

The 2007-2009 Feasibility Studies evaluated factors including environmental, technological (architectural and structural), social, and cost factors. The relevant conclusions of the 2007-2009 Feasibility Studies are summarized on pages 4-15 through 4-17 of the Draft EIR and demonstrate why it would not be feasible to adaptively reuse the District's individually eligible resources and all of the Primary and/or Secondary Contributors. Specifically, doing so would be extremely costly even based on the 2007-2009 cost estimates, which would be expected to increase significantly over the last approximately ten years, and would frustrate the majority of the County's Project Objectives.

While the information from the 2007-2009 Feasibility Studies provided substantial evidence to support the conclusion in the Draft EIR that it would be infeasible to reuse the District's individually eligible resources and all of the Primary and/or Secondary Contributors, the County recognized that more up-to-date information was necessary to determine whether the alternatives

carried forward for analysis in the Draft EIR would be feasible today given considerations related to architectural and structural conditions, mothballing requirements, and cost. Therefore, the County commissioned a Focused Feasibility Study (2020 Feasibility Study) (Harlan et al., 2020) to address the current requirements and costs of rehabilitating and adaptively reusing historical resources for current County needs, as well as determining the costs for mothballing. The 2020 Feasibility Study is discussed in more detail below and is provided in Appendix L to this Final EIR. The 2020 Feasibility Study focused on the current requirements and costs of rehabilitating and adaptively reusing historical resources for current County needs as well as determining the costs for mothballing. The 2020 Feasibility Study was undertaken by a multidisciplinary team of highly qualified technical professionals, including SMS Architects for the Architectural (Building Condition) Assessment Reports and Mothballing Reports, Coffman Engineers, Inc., for the Structural Assessment Reports, and MGAC for preparation of Cost Plans for both Preservation/Adaptive Reuse and Mothballing, who were engaged as sub-consultants to ESA, under contract to the County of Los Angeles. The technical consultants conducted an intensive pedestrian survey of the Rancho Los Amigos South Campus. The 2020 Feasibility Study also relied upon technical documents prepared by Diamond West Engineering, Inc., and Mollenhauer Group that were prepared for the previous 2007-2009 Feasibility Studies that were found to still be useful for the current study for as-found historic structures/building surveys.

The analysis focuses on Individually Eligible buildings and on representative examples of each building type and includes a summary report of findings organized by building for the Individually Eligible Contributors and the Primary and Secondary Contributors in the District. In total, there are five reports organized by building for both Preservation/Adaptive Reuse and Mothballing approaches: an Architectural Assessment Report, a Structural Assessment Report, a Preservation/Adaptive Reuse Cost Plan, a Mothballing Report, and a Mothballing Cost Plan.

The Architectural Assessment Report found that all evaluated structures have substantially deteriorated since the time of the previous 2007-2009 Feasibility Studies due to vandalism, water damage, arson related fire and general exposure.

The Structural Assessment Report evaluated the feasibility of bringing each building to a Life Safety Performance Level for future use and occupancy, as defined in the 2013 edition of the American Society of Engineers (ASCE) Standard No. 41, entitled Seismic Evaluation and Retrofit of Existing Buildings (ASCE 41-13). As stated in the Structural Assessment Report, time, weather, fires, seismic activity, high winds, water intrusions, soil settlement, and vandalism have worsened the conditions at the site. For example, and as supported by evidence contained in Appendix L of the Final EIR, LACO Nos. 1300, 1302, and 1184 through 1187 have been subject to water damage and vandalism. LACO Nos. 1101, 1186, 1194, 1204, 1267, and 1287 have been subject to arson. As a result, many of these buildings have exposed areas, which causes ongoing damage related to weather (such as winds).

Additionally, higher expected earthquake forces, unknown faults, and damage caused by recent earthquakes (i.e., Northridge earthquake) have necessitated revisions to the building code, resulting in more stringent engineering design and retrofit requirements. Further, in the types of structures on the Project Site, the reinforcement, detailing, material variance, and design would

present a high risk of significant damage and risk to occupants during even a moderate seismic event. Many of the masonry and concrete buildings on the Project Site also have those same risks and concerns. Soil settlement, either caused by or exacerbated by, previous earthquakes have caused damage in LACO Nos. 1189, 1191, 1192, 1262, 1263, and 1301, as discussed in Appendix L of the Final EIR.

The feasibility and/or historic studies that were published between 1995 and 2020 identify historic resources and substantiate a finding of infeasibility for alternatives that assumed full repair or reuse of historic structures. With respect to economic feasibility, the County has determined that as a public agency responsible to tax payers, transitioning the South Campus to a safe, productive, and accessible property is the most efficient use of limited public funds.

With regard to Project Objectives, the EIR includes 12 Project Objectives that indicate the overall purpose and need of the Project, which consider a range of objectives beyond security and maintenance costs. As indicated in Subsection 2.3, *Project Objectives*, of Chapter 2, *Project Description*, of the Draft EIR, the proposed Project aims to consolidate the County's existing ISD and Probation Headquarters, which are currently distributed over various locations for each individual department into one location and maximize use of the underutilized County-owned Rancho Los Amigos South Campus. The proposed Project would create a modernized and revitalized County administrative campus within the Project Site and would create a new civic center within the South Campus that would serve important County functions, as well as improve overall visual and hazard concerns for the larger surrounding community. The purpose of the EIR, as stated in CEQA Guidelines Section 15002(f) is to analyze the significant environmental effects of a proposed project, to identify alternatives, and to disclose the possible ways to reduce or avoid the possible environmental damage, which is achieved in the EIR.

Refer also to Response to Comment No. C3-11 for a discussion of the economic feasibility of each of the Project alternatives.

Response No. C3-4

The commenter indicates that because the District has been left unsecured, it has led to the loss and destruction of some of the contributing historic resources and questions the County's maintenance activities. Page 2-15 of Chapter 2, *Project Description*, of the Draft EIR describes the measures that the County has undertaken to secure the buildings in response to ongoing arson and vandalism and to ensure public safety, which include the following: "fencing off the areas around each of the fire-damaged buildings; installing approximately 2,000 feet of 8-foot high, chain link fence with 200 'No Trespassing' signs around the South Campus; repairing existing fencing; boarding up and/or reinforcing existing boards on all building wall openings in order to secure the buildings; installing 39 strategically-located pole-mounted LED solar lights on aboveground concrete pedestals; installing signage with building numbers on existing structures for ease of identification and to better facilitate emergency response; trimming overgrown trees and bushes along the southwest perimeter of the South Campus; clearing of debris and other potential fire hazards out of the unoccupied buildings; increasing the number of Sheriff's Department deputies patrolling the South Campus; and having the Sheriff's Department Aero Bureau conduct periodic airship patrols day and night over the South Campus to detect

trespassers with infrared cameras.” The annual cost of these ongoing maintenance measures has been approximately \$1.9 million with additional one-time costs of \$1.3 million, and has required considerable Sheriff and County staff resources (County of Los Angeles, 2020a). Despite these efforts, the Project Site and the buildings continue to be subject to unauthorized human occupation and vandalism. This does not indicate any lack of effort on the County’s part, but rather the difficulty of securing such a large, vacant site with numerous structures, and the persistence of trespassers. The deterioration of the Project Site is not a result of intentional or neglectful acts by the County.

The commenter also provides photo-documentation of observed conditions in November 2019 that appear intended to support the commenter’s assertion that the County is neglecting the historic resources through improper maintenance and security measures (see the section of the letter entitled “Exhibit C: Various points of entry and lack of security. Rancho Los Amigos, as photographed by Los Angeles Conservancy on November 20, 2019”). Rather than illustrating any negligence by the County in its attempts to secure the site, the photo-documentation only further highlights the ongoing challenges the County faces in its attempts to secure the site, which continue to be thwarted by trespassers intent on gaining access to both the site and to the buildings that comprise the District. For instance, the photo-documentation shows multiple holes cut into the perimeter fencing, as well as boards illegally removed from the buildings on the site by trespassers in order to gain access to the buildings. Despite the County’s ongoing investment into the security and maintenance of the South Campus, the relatively recent photo-documentation merely illustrates that human-introduced issues continue to prevail.

The commenter also includes a footnote to Los Angeles County Code (LACC) 22.14.080 – H and suggests the County is not in compliance with the Code. The commenter appears to be referencing a definition within this Code section of “demolition by neglect,” which states:

Demolition by neglect. The intentional or neglectful failure by an owner, lessee, or other person with possession, care, or control of a landmark or property in an historic district to provide maintenance and repair to the landmark or property which results in one or both of the following:

1. The severe deterioration of exterior features of the landmark or property which renders the landmark or property unsafe as defined in Section 102.1 of Title 26 (Building Code) of the County Code.
2. The severe deterioration of the exterior or interior features of the landmark or property, including but not limited to walls, roofs, chimneys, doors, windows, porches, structural or ornamental architectural elements, or foundations, that is likely to result in permanent damage or loss of any character-defining elements or historic features of the landmark or historic district.

However, “historic district” as used in this context means “[a] contiguous or noncontiguous geographic area containing one or more contributing properties which has been designated as an historic district by the Board pursuant to Chapter 22.124 (Historic Preservation),” and “landmark” means “Any property, including any structure, site, place, object, tree, landscape, or natural feature, that is designated as a landmark by the Board pursuant to Chapter 22.124 (Historic

Preservation).” (See LACC 22.14.080-H). Although the District is determined eligible to the National Register and is listed on the California Register, the County Board of Supervisors has not designated it as a landmark or an historic district and it is, therefore, not subject to the County’s Historic Preservation Ordinance or this section of the LACC, and it is not currently proposed for designation. In any event, the deterioration of the Project Site is not a result of intentional or neglectful acts by the County, as discussed above.

Response No. C3-5

The commenter references (and attaches) the December 21, 2017, comments the Conservancy provided on the Notice of Preparation for the Rancho Los Amigos South Campus Project, citing concern about the approach to demolition of buildings in the District. The commenter also references additional correspondence provided by the Conservancy on June 27, 2018, during the Draft EIR preparation phase, which followed a focused consultation meeting at the Project Site between the County and the Conservancy. The County was in receipt of both of these letters, and considered them in the development of the Historic District Analysis Report and the Draft EIR (refer to Appendix A-2 to the Draft EIR, which includes the December 2017 Conservancy letter in response to the Notice of Preparation [NOP] that was issued for the EIR). The June 2018 letter included examples of adaptive reuse projects, which the County has considered.

Refer to Response to Comment No. C3-2 for a discussion of alternatives analyzed in the Draft EIR that retain the Historic District and repurpose buildings for new uses. In addition, in terms of preservation and reuse, the Draft EIR considered two scenarios of a Rehabilitation Alternative, which was rejected as infeasible, and an Adaptive Reuse/Reduce Project Alternative, which was evaluated in detail. In addition, as further discussed in Response to Comment No. C3-7, a new alternative has been identified that would increase adaptive reuse and preservation opportunities on the Project Site, while providing for new construction.

The County considered all of the comments provided by the Conservancy, as well as the discussions that occurred during focused meetings and a site tour with the Conservancy, during development of the Draft EIR and the supporting Historic District Analysis Report. As described in this response, as well as Responses to Comments Nos. C3-2 and C3-3, the County has used a number of feasibility studies prepared between 1995 and 2020, as well as technical information provided in the Draft EIR and associated technical appendices, to develop and evaluate alternatives that analyze various options related to retaining the District, as well as the preservation and adaptive reuse of buildings, structures, and features.

Response No. C3-6

The commenter claims that the County is circumventing CEQA by improperly including what it characterizes as a “separate project” (i.e., the Project’s inclusion of demolition of structures outside the Development Area on the Rancho Los Amigos South Campus). As defined in CEQA Guidelines Section 15378(a), a project “means the whole of an action, which has the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the” Page 2-1 of Chapter 2, *Project Description*, of the Draft EIR

describes the “whole of the action” for purposes of this Project, which is both: (1) the construction of new County facilities and associated infrastructure within a 35-acre portion of the Project Site referred to as the Development Area, including the demolition of existing structures; and (2) building demolition, infrastructure construction, and remediation on the remainder of the Project Site, outside of the proposed Development Area. Therefore, the Final EIR appropriately analyzes the whole of the action. Further, the Project Objectives identified on pages 2-17 through 2-18 of Chapter 2, *Project Description*, and pages 4-4 to 4-5 of Chapter 4, *Alternatives*, of the Draft EIR address the County’s need for Project-related activities both within and outside of the Development Area. The objectives include the County’s desire to eliminate public safety concerns associated with the existing unoccupied campus setting including vandalism, arson, theft, structural instability, and habitation by individuals and urban wildlife; to develop County facilities in a safe environment that would increase use of the South Campus by County staff and visitors, and enhance the health and wellbeing of the South Campus as an integral part of the surrounding community; to provide an attractive, uncluttered visible gateway to the South Campus from Imperial Highway and establish a common character and tone for the Campus; and to enable the South Campus to complement and readily adapt to potential future projects in the immediate proximity to the South Campus. Demolition of structures outside the Development Area is necessary to achieve these critical objectives.

Refer also to Responses to Comment Nos. C3-2, C3-3, and C3-5 for a discussion of various potentially feasible preservation alternatives evaluated in the Draft EIR.

Response No. C3-7

The commenter suggests a modified Alternative 4 that would include new construction and the adaptive reuse of select District contributors, which the Conservancy envisions would retain the Historic District and meet most of the Project Objectives. In response to this comment, and as supported by the 2020 Feasibility Study described in Response to Comment No. C3-3, the Final EIR includes a modified Alternative 4 (Scenario 2), as described below (refer to also Chapter 4, *Alternative 4 Scenario 2*, to this Final EIR for a full description and analysis of environmental impacts and applicable mitigation measures).

Under Alternative 4 Scenario 2, a portion of the proposed County uses would be relocated into selected existing Individually Eligible buildings within the District which would be adaptively reused, in addition to the new construction proposed under the Project. Specifically, Alternative 4 Scenario 2 would adaptively reuse two Individually Eligible Primary Contributors to include various components of the proposed County uses: (1) LACO No. 1238 (Casa Consuelo) and (2) LACO No. 1300 (Power Plant). LACO No. 1301 (Water Tower), an Individually Eligible Primary Contributor, would be restored, repainted, and seismically upgraded. While it would not be operational upon restoration, the Water Tower would remain on the Project Site and continue to serve as a focal point for the South Campus. LACO No. 1302 (Shop & Laundry), an Individually Eligible Primary Contributor, would be mothballed for future County use. No funding or uses are identified at this time, and this scenario only includes retaining and mothballing the structure. In addition, the Moreton Bay Fig will remain, and LACO No. 1100, which is currently occupied by the LASD Professional Standards Division, will continue to

remain in operation in the same manner. In summary, under Alternative 4 Scenario 2, a total of six (6) Individually Eligible buildings and structures would be retained either through adaptive reuse, restoration, mothballing, or retention.

In addition to the buildings to be retained, adaptively reused where indicated, and mothballed, this scenario would also build new construction in the Development Area as proposed under the Project. Similar to the Project, this scenario would construct 650,000 square feet of developed floor area for the ISD Headquarters, Probation Department Headquarters, and County Office Building to accommodate 3,000 employees. This scenario would also develop the ISD/Probation Parking Structure and County Office Parking Structure, as well as all necessary infrastructure improvements.

The proposed Project and Alternative 4 Scenario 2 address similar buildings and/or structures, but with important distinctions in terms of their ultimate disposition. **Table C3-1** provides a comparison of the Project and Alternative 4 Scenario 2.

**TABLE C3-1
COMPARISON OF PROPOSED PROJECT AND ALTERNATIVE 4 SCENARIO 2 (DISTRICT CONTRIBUTORS)**

Building No.	Name	Project	Alternative 4 Scenario 2
1238	Casa Consuelo	Mothball	Adaptively Reuse
1300	Power Plant	Demolish	Adaptively Reuse
1301	Water Tower	Mothball	Restore, Repaint, and Seismically Upgrade
1302	Shop & Laundry	Demolish	Mothball
1100	Administration Building	Retain	Retain
N/A	Moreton Bay Fig	Retain	Retain

The commenter suggests a modified Alternative 4 that would pair new construction with the adaptive reuse of select District contributors. In response, the County has developed Alternative 4 Scenario 2, which is evaluated in this Final EIR and is summarized in Response to Comment No. C3-7 and described in detail in Chapter 4, *Alternative 4 Scenario 2*, of the Final EIR. The feasibility of this alternative and whether or not it will be adopted is a decision that will be made by the Board of Supervisors when it makes its final determination on the proposed Project.

Response No. C3-8

This comment correctly summarizes information presented in the Draft EIR and the supporting Rancho Los Amigos Historic District Analysis Report that is provided as Appendix D-1 to the Draft EIR. As this comment does not contain any information that is not already included in the Draft EIR or its supporting technical appendices, no further response is required.

Response No. C3-9

This comment provides a correct summary of Project information and impacts described in Chapter 2, *Project Description*, of the Draft EIR, and Section 3.4, *Cultural Resources*, of the Draft EIR. As this comment does not contain any information that is not already included in the Draft EIR, no further response is required.

Response No. C3-10

The commenter reiterates its position that demolition outside of the Development Area should be evaluated as a separate project. As explained in Response to Comment No. C3-6, demolition of buildings outside the Development Area is not a secondary proposal, but part of the whole of the action that the County is considering to meet specific Project Objectives critical to the success of the Project as a whole. These objectives include, but are not necessarily limited to, eliminating public safety concerns associated with the existing unoccupied campus setting and enabling the South Campus to complement and readily adapt to potential future projects in immediate proximity to the South Campus. Demolition of the structures outside of the Development Area would provide a safer environment for employees and visitors to the proposed Project and would ready the southern portion of the South Campus for future development. Additionally, continuing to expend resources securing the South Campus and/or mothballing the structures outside of the Development Area when there is no viable use for these structures in the foreseeable future would require the use of County funds that could be better spent on other priority projects within the County, particularly given economic uncertainties experienced by the County at the present time as a result of the 2020 COVID-19 pandemic.

Refer also to Responses to Comments Nos. C3-2, C3-3, C3-5, and C3-7 for a discussion of various potentially feasible preservation alternatives evaluated in the Draft EIR and Final EIR.

Response No. C3-11

This comment requests that “reasonable alternatives must be considered even if they substantially impede the project or are more costly.” As required by CEQA Guidelines Section 15126.6(a), and as stated on pages 4-1 and 4-2 of Chapter 4, *Alternatives*, of the Draft EIR and assumed in the Draft EIR alternatives analysis, an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project. CEQA Guidelines Section 15126.6(a) goes on to say that an EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. As more fully described in Response to Comment No. C3-2, feasibility is defined in CEQA as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors” (Public Resources Code Section 21061.1). CEQA Guidelines Section 15126.6(f) specifies factors that may be taken into account when addressing the feasibility of alternatives; these factors include site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional

boundaries and whether the proponent can reasonably acquire, control, or otherwise have access to an alternative site.

Chapter 4, *Alternatives*, of the Draft EIR identifies a reasonable range of alternatives and the reasons for selecting those alternatives, all of which would feasibly attain most of the basic objectives of the Project and would avoid or substantially lessen any of the significant effects of the Project. The range of alternatives included an offsite location, no project, partial preservation, full preservation, two scenarios for rehabilitation, reduced demolition, and adaptive reuse/reduced project. Each of these alternatives, other than the offsite location and no project alternative, provide different assumptions for new construction, demolition, rehabilitation and reuse, and preservation (e.g., mothballing), presenting a reasonable range of alternatives. In addition, as further described in Responses to Comments Nos. C3-2, C3-3, and C3-7, the Final EIR evaluates an additional alternative (Alternative 4 Scenario 2) in response to the Conservancy's comments.

The comment also indicates that the infeasibility of alternatives must be supported by substantial evidence. Chapter 4, *Alternatives*, of the Draft EIR presents substantial evidence regarding the feasibility of the Project alternatives. As discussed above in Response to Comment No. C3-3, the 2020 Feasibility Study found that all evaluated structures have experienced further substantial deterioration since the 2007-2009 Feasibility Studies were prepared due to time, weather, arson-related fires, seismic activity, high winds, water intrusions, soil settlement, and vandalism, which makes rehabilitation and reuse more difficult and costly. For example, and as supported by evidence contained in Appendix L of the Final EIR, LACO Nos. 1300, 1302, and 1184 through 1187 have been subject to water damage and vandalism. LACO Nos. 1101, 1186, 1194, 1204, 1267, and 1287 have been subject to arson. As a result, many of these buildings have exposed areas, which causes further damage related to weather (such as winds and rain). Additionally, and also as stated in Appendix L of the Final EIR, recent earthquakes (i.e., Northridge earthquake) have necessitated revisions to the building code, resulting in more stringent engineering design and retrofit requirements. In the types of structures on the Project Site, the reinforcement, detailing, material variance, and design would present a high risk of significant damage and risk to occupants during even a moderate seismic event. Many of the masonry and concrete buildings on the Project Site also have those same risks and concerns. Soil settlement, either caused by or exacerbated by, previous earthquakes have caused damage in LACO Nos. 1189, 1191, 1192, 1262, 1263, and 1301, as discussed in Appendix L of the Final EIR.

In addition, as documented in the 2020 Feasibility Study and discussed above, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural, seismic, and architectural upgrades to bring the historic buildings into serviceable use as required for compliance with Building Codes, as well as seismic, ADA, and Title 24 requirements. Additionally, the majority of the buildings on the South Campus are not good candidates for housing County uses because of the lack of sufficient square footage and open floor plans needed to ensure operational efficiency. The County carefully considered whether it would be possible to reuse the two-story wards along Erikson Avenue (LACO Nos. 1184-1188); however, rehabilitating these buildings would result in locating County uses in multiple buildings, thereby fractioning work units, which is contrary to the Project Objective of facilitating proximate and efficient inter-departmental and cross-sector collaboration and providing proximity to other

surrounding County facilities. They are also seismically unsafe and lacking infrastructure for elevators, ADA access, and ADA facilities. In addition, unreinforced masonry buildings have inferior structural systems that would require extensive structure upgrades to meet current Building Codes. There would also be security and maintenance challenges due to large spread of buildings across the South Campus. Multiple security guards would be required to man multiple buildings, and each building would have multiple entries to monitor, as opposed to the new construction with one secured manned entry per building. Lastly, the daylight in the historic buildings would be restricted to existing small windows, which would produce a less desirable work space for employees with limited natural lighting, in contrast to the floor to ceiling glass in the new construction, which would produce a more desirable work space for employees with more natural lighting (Hedge, 2018).

In terms of costs, **Table C3-2** provides the estimated costs for preservation/adaptive reuse or mothballing of the Primary Individually Eligible buildings and the Primary and Secondary Contributors as of January 2020, as well as the costs associated with each of the Project alternatives evaluated in the Final EIR. Appendix L of the Final EIR includes additional details about the specific costs related to each individual building and the challenges of rehabilitating these structures to occupational standards. As stated in Response to Comment No. C3-3, Appendix L of the Final EIR evaluates both the preservation/adaptive reuse and mothballing approaches relative to architectural and structural conditions, costs, and mothballing requirements.

The comment also provides a summary of Alternative 2 (Partial Preservation Alternative) and Alternative 4 (Adaptive Reuse/Reduced Project), as found in Chapter 4, *Alternatives*, of the Draft EIR. The comment then states that the analysis for Alternative 4 does not reject the alternative as infeasible, and instead the alternative is capable of meeting nearly all of the objectives. As stated on page 4-71 of Chapter 4, *Alternatives*, of the Draft EIR, Alternative 4 would meet some of the identified Project Objectives, but to a lesser extent than the proposed Project. As stated on page 4-72, the only objective that Alternative 4 would fully meet would be to fulfill the spirit and intent of historic preservation, as set forth in the Secretary of the Interior's Standards, by ensuring the proper care and treatment of the most important historic resources on the South Campus to a greater extent than the proposed Project as more historical buildings would be retained under development of this alternative. Otherwise, all other objectives would be met to a lesser extent than the proposed Project or not met at all.

**TABLE C3-2
SUMMARY OF COSTS**

Summary of Preservation and Mothballing costs by Historic Resource

Components	Preservation/Adaptive Reuse Cost	Mothballing Cost	Demolition and New Construction	TOTAL COST
Primary Individually Eligible buildings and Primary and Secondary District Contributors	\$462,197,000	\$17,103,000	N/A	N/A
Primary Contributors	\$186,781,000	\$7,882,000	N/A	N/A
Secondary Contributors	\$124,778,000	\$5,853,000	N/A	N/A
Individually Eligible Primary buildings including Casa Consuelo (LACO No. 1238), Power Plant, Shop, Laundry & Ice Plant (LACO Nos. 1300, 1302) and Water Tower (LACO No. 1301)	\$65,095,000	\$3,370,000	N/A	N/A

Summary of Costs by Project and Alternative

Components	Preservation/Adaptive Reuse Cost	Mothballing Cost¹	Demolition and New Construction	TOTAL COST
Proposed Project as evaluated in Chapter 2, <i>Project Description</i>	N/A	\$1,427,000	\$587,600,000	\$589,027,000
Alternative 1 (No Project)	\$0	\$0	\$0	\$1,900,000 ²
Alternative 2 Scenario 1 (Partial Preservation)	\$0	\$12,802,000	\$587,600,000	\$600,402,000
Alternative 2 Scenario 2 (Partial Preservation)	\$0	\$8,422,000	\$587,600,000	\$596,022,000
Alternative 3 (Reduced Demolition)	\$0	\$4,747,000	\$587,600,000	\$592,347,000
Alternative 4 Scenario 1 (Adaptive Reuse/Reduced Project)	\$108,773,000	\$5,405,000	\$0	\$114,178,000
Alternative 4 Scenario 2 (Adaptive Reuse/Reduced Project)	\$22,345,000	\$2,519,000	\$587,600,000	\$612,464,000

¹ Mothballing would also have costs associated with securing the building from vandals, break-ins, and natural disasters and developing a maintenance and monitoring plan, which are not reflected here. The mothballing costs include stabilizing and protecting the existing spaces and features including providing temporary roofing materials or roofings system as may be required, as stated in Appendix L, PDF page 126.

² This reflects ongoing (annual) operation and maintenance costs (e.g., security patrols, clearing debris, repairing fencing, and boarding up buildings). It does not include additional one-time costs of \$1.3 million (County of Los Angeles, 2020a).

NOTE: The Cost Plan assumes a construction start date of January 2021 and construction duration of 36 months; Costs are current as of January 2020.

SOURCE: 2020 Feasibility Study, ESA (refer to Appendix L to this Final EIR)

Similarly, as stated on pages 4-38 and 4-39, development of Alternative 2 (Partial Preservation Alternative) would not meet the Project Objective to enable the South Campus to complement and readily adapt to potential future projects for several reasons. The mothballed buildings would continue to deteriorate and would only partially meet the preservation objectives of the Project either now or in the future; in addition, these structures would continue to be a safety hazard to the community and would not meet the County's objective to provide a safe environment. While the retained and mothballed buildings would be preserved intact under the Partial Preservation

Alternative, the buildings would not be publicly accessible and this would negate any possible benefit for meaningful interpretation or education. As a result, the significance of the historical resources would not be fully recognized or celebrated as culturally important historic elements of the South Campus and would not fully meet the objective to recognize unique, culturally important historic elements of the South Campus by retaining and interpreting selected buildings, open spaces, and landscape features for the benefit of the public.

When considering approval of the proposed Project and in making their findings, the County Board of Supervisors will take into account the various economic, environmental, social, legal, technical, and other considerations regarding the feasibility of the Project and each alternative. This includes the cost information provided herein and as detailed in the 2020 Feasibility Study provided in Appendix L to this Final EIR. For any alternatives rejected as infeasible, the supporting reasons will be provided in Findings that would be adopted by the Board of Supervisors at the time of Project approval. The Findings will describe the specific reasons for rejecting any alternatives, supported by substantial evidence in the record.

Response No. C3-12

The commenter states that Alternative 4 should be modified by pairing new construction with the current adaptive reuse proposal, which could potentially either fully or partially meet all of the Project Objectives.

In response to the commenter's suggestion for a modified Alternative 4 that would allow for both preservation, rehabilitate and reuse, and new construction, and in Response to Comment No. C3-7 that also asks for a modified Alternative 4, the County developed a new scenario (Scenario 2) of Alternative 4 (Adaptive Reuse/Reduced Project Alternative). Refer to Response to Comment No. C3-7 for a description of the new Alternative 4 Scenario 2, which is evaluated in Chapter 4, *Alternative 4 Scenario 2*, of the Final EIR.

The commenter also suggests that new construction of the County's proposed uses could occur in three alternate locations on the South Campus: (1) along Erickson Avenue, directly across from the District contributors proposed for adaptive reuse; (2) locations on Aliso Avenue or Laurel Street proposed for new construction in Alternative 2; and (3) the triangle of open space west of Laurel Street as it is undeveloped and outside the Historic District Boundary.

In the first suggestion, the commenter suggests that the County develop new construction along Erickson Avenue across from the District contributors proposed for Adaptive Reuse in Alternative 4. Given the size of the ISD Headquarters, Probation Department Headquarters, and Parking Structure, new construction would likely be required both north and south of Consuelo Street. North of Consuelo Street, the new development would still require demolition of Primary Contributors, which would reduce impacts to historical resources in comparison to the Project because a greater number of contributors would likely be retained, but would still result in a significant unavoidable impact to the District. South of Consuelo Street, new construction would result in the demolition of Non-Contributors, Tertiary Contributors, and Secondary Contributors,

and, likely, Building 1100, an Individually Eligible Building. This would also likely result in a significant and unavoidable impact to the District.

In addition, development outside of the Project Site (or Development Area) would require the extension of infrastructure, which would involve additional costs. For example, it would cost over \$1 million to run high voltage electrical power, telecommunications, sewer, and domestic water to this area and approximately \$175,000 for geotechnical investigations. In addition, there would be additional costs associated with civil surveys, utility surveying, and trenching down Erickson Avenue, which would require repaving the street (County of Los Angeles, 2020b).

Further, given its location relative to the proposed County Office Building and Parking Structure, it would not achieve Project Objectives related to: (1) the construction of facilities that allow the County to provide superior services through proximate and efficient inter-departmental and cross-sector collaboration and providing proximity to other surrounding County facilities and providing an attractive, uncluttered visible gateway to the South Campus from Imperial Highway.

In addition, the Site Plan, which is considered a Contributor to the District, would also be adversely affected through this suggestion by the new construction that would materially impair the Site Plan. As stated on page 3.4-32 of the Draft EIR, the Site Plan is a contributing feature that consists of the District's circulation paths, landscaping, and spatial relationships between the contributing buildings. Removal of contributing buildings, structures, and features and alteration of the Site Plan would affect the integrity and historical significance of the District, while removal of non-contributing buildings, structures, and features would not impact the District's integrity or historical significance. Furthermore, as stated above, the new construction that would be located south of Consuelo Street would require the development of new infrastructure, high voltage electrical power, and utility connections, including telecommunication vaults, sanitary sewer mains, storm sewers, water mains, and additional roadway improvements.

For the second suggestion, the commenter suggests that the County develop new construction on Aliso Avenue and Laurel Street, which is what Alternative 2 (Partial Preservation Alternative, both scenarios) proposes. This suggestion would involve demolition of several Non-Contributors and Tertiary Contributors, along with a few Primary Contributors, in the southwestern corner of the District, while leaving the majority of the Primary and Secondary Contributors in the historic core of the District largely intact. Alternative 2 is addressed in detail on pages 4-24 through 4-39. Alternative 2 is a program for retention of certain buildings using a mothballing approach. As stated on page 4-30, under both scenarios of Alternative 2, there would be adverse impacts to the integrity of the District. However, as stated on page 4-31, impacts under the first scenario of Alternative 2 would be less than significant because a majority (65 percent) of the District would be retained, while impacts under the second scenario of Alternative 2 would be significant and unavoidable because a majority of Contributors would be removed. Further, as concluded on page 4-38, and further discussed on pages 4-38 and 4-39, the Partial Preservation Alternative would meet some of the identified Project Objectives, but to a lesser extent than the proposed Project.

As stated on page 1 of Summary D, Summary of Mothballing Reports, provided in of Appendix L of the Final EIR, mothballing describes a short-term goal, and not a long-term building

rehabilitation effort. Preservation Brief #31, which is published by the U.S. Department of the Interior, describes the steps that are entailed in the process of mothballing a building to protect it for a period of up to ten years (Sharon C. Park, 1993). However, as also described in that publication, the long-term success of any mothballing endeavor “will also depend on continued, although somewhat limited, monitoring and maintenance.” Finally, it is also important to note that mothballing will not provide the longer cycle performance that characterizes a restoration or a rehabilitation project since mothballing is intended to only serve as an interim measure to protect unused buildings until such time that a new use is found for them.

As further stated on page 2 of Summary D, Summary of Mothballing Reports, provided in of Appendix L of the Final EIR, the mothballing process as described in Preservation Brief #31 has four main components that are applicable to the subject property, as follows (1) documentation and recordation of buildings to be mothballed; (2) the preparation of a condition assessment for buildings to be mothballed; 3) the stabilization of buildings to be mothballed; and (4) the actual mothballing of buildings. Each of these components, or steps, is intended to be performed in sequential order in the effort to mothball an individual building or a grouping of buildings.

The third suggestion states that the new development could be located in the triangle of open space west of Laurel Street as it is undeveloped and outside the Historic District boundaries. Since the new construction would be outside of the District, this suggestion would result in no adverse impacts to historical resources. However, similar to the first suggestion, the new construction would require the development of new infrastructure and utility connections that do not currently exist at the suggested locations, which would result in additional and significant costs, as discussed above; it is also located outside of the Project Site; and it would not achieve Project Objectives related to: (1) the construction of facilities that allow the County to provide superior services through proximate and efficient inter-departmental and cross-sector collaboration; (2) avoiding or minimizing land acquisition, entitlement, and other siting costs and avoid potential land use conflicts by prioritizing the reuse of County-owned property; and (3) providing proximity to other surrounding County facilities and providing an attractive, uncluttered visible gateway to the South Campus from Imperial Highway. In addition, vehicular access to the “triangle parcel” is limited, as it is bounded by railroad tracks to the west and an existing building to the north. The only access would be provided by Laurel Street/Aliso Avenue (to the east and south), which is an unmarked and narrow two lane street that connects with Erickson Street to the east (via a 90-degree turn from Laurel Street to Aliso Avenue)) and Flores Street to the north, although Flores Street only travels eastbound to connect to Erickson Avenue.

Response No. C3-13

This comment states that there does not seem to be coordination between the County for this Draft EIR and the City of Downey for its Specific Plan EIR. The County and the City of Downey instituted monthly meetings to coordinate planning efforts beginning in 2017 and until April 28, 2020. While there was a pause in April, meetings have continued and are ongoing. In addition, the City of Downey attended both of the public meetings on this project, and County staff has had several phone conversations with City staff.

The City of Downey Specific Plan Update for the Rancho Los Amigos South Campus is included as a cumulative project on page 2-46 of Chapter 2, *Project Description*, of the Draft EIR and analyzed as part of the Draft EIR. As stated on page 3.9-12 of Section 3.9, *Land Use and Planning*, of the Draft EIR, the County has been coordinating with the City of Downey to provide development standard recommendations for the Specific Plan Update. At the time of release of the Project's Draft EIR, the City of Downey Specific Plan Update and its EIR were still under preparation. While a Notice of Preparation was issued for the Specific Plan Update in February 2019, a land use program was not included in the notice (City of Downey, 2019). Instead, it provides general goals of the Specific Plan Update, such as to encourage and promote economic development and revitalization to enhance the City's attractiveness to the local and regional marketplace; remove regulatory obstacles to the reuse of existing structures and promote infill development of currently vacant and underutilized properties; and facilitate and encourage enhanced commercial, retail, and mixed-use opportunities, residential development, public and open spaces, an improved pedestrian environment, and a variety of transportation choices that will enhance the potential for a multi-modal transportation center. Development within the Specific Plan Update site will be guided by the goals previously described, with a more specific land use program provided in the Specific Plan Update, when it is completed, and evaluated in its EIR. Further, given the timing of development of the Specific Plan and Specific Plan EIR, it is not reasonable to assume that any development in the Specific Plan area would occur before the Rancho Los Amigos South Campus Project (this Project) is implemented, and it would be entirely speculative to anticipate the nature of any such future development, if it were to occur.

Response No. C3-14

This comment provides a brief description about the Los Angeles Conservancy and serves as a conclusion to the comment letter. This comment also provides contact information, as needed.

The remainder of the Comment No. C3 includes exhibits and attachments to supplement the comment letter. No further response is required.

Letter C4

Historical Society of the Crescenta Valley
Michael Morgan, President
2616 Altura Avenue
La Crescenta, CA 91214
Letter dated November 21, 2019
Received on November 21, 2019

Response No. C4-1

The County thanks the Historical Society of the Crescenta Valley for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment states that the commenter opposes the Project as defined in the Draft EIR and supports the Los Angeles Conservancy's recommendations for adaptive reuse of the Project Site.

The Draft EIR considered two alternatives that include the adaptive reuse of various buildings. As discussed in Chapter 4, *Alternatives*, of the Draft EIR, adaptive reuse was considered for the Rehabilitation Alternative and two scenarios of an Adaptive Reuse/Reduced Project Alternative. In addition, as further discussed in Response to Comment No. C3-7, a new alternative has been identified that would increase adaptive reuse and preservation opportunities on the Project Site as compared to the proposed Project, while providing for new construction.

With regard to the Rehabilitation Alternative, two scenarios were considered. Under the first scenario, the District's Individually eligible resources and the Primary Contributors would be adaptively reused for County office uses, while the Secondary Contributors would be mothballed. Under the second scenario, the Individual Resources, Primary Contributors, and Secondary Contributors would all be rehabilitated and adaptively reused for office uses.

Scenario 1 of the Rehabilitation Alternative was rejected as infeasible on pages 4-16 and 4-17 of the Draft EIR. While the "spirit and intent" of historic preservation would be met by Scenario 1 of the Rehabilitation Alternative for the some of the District's resources including the Individual Resources and Primary Contributors that are of highest cultural value, none of the Secondary Contributors would be adaptively reused and they would continue to be susceptible to deterioration, intrusion and vandalism. Furthermore, none of the other County's Project Objectives would be met. In addition, this Rehabilitation Alternative would be extremely costly to implement and would also incur on-going maintenance, repair and security expenses associated with mothballing. As shown below in **Table C3-2**, the cost of adaptively reusing the Primary Contributors would be \$186,781,000, and the cost of mothballing the Secondary Contributors would be \$5,853,000, resulting in a total cost for Scenario 1 of the Rehabilitation Alternative to \$192,634,000.

Scenario 2 of the Rehabilitation Alternative was similarly rejected as infeasible on page 4-17 of the Draft EIR. Like Scenario 1, Scenario 2 would meet the “spirit and intent” of historic preservation. However, Scenario 2 would cost more than \$178 to \$218 million in 2007 dollars (and more now) and would require County uses to be installed in approximately 35 separate rehabilitated historic buildings, which would conflict with the majority of the County’s Project Objectives. As shown below in **Table C3-2**, the cost of adaptively reusing both the Primary and Secondary Contributors would be \$462,197,000.

In summary, while the "spirit and intent" of historic preservation would be met by both scenarios one and scenario two of the Rehabilitation Alternative, for the some of the District’s resources including the Individual Resources and Primary Contributors that are of highest cultural value, none of the Secondary Contributors would be adaptively reused (under the first scenario), most of the County’s Project Objectives would be met. Since this Rehabilitation Alternative, under both scenarios, would be extremely costly to implement, would not achieve most of the County’s objectives, and also would incur on-going maintenance, repair and security expenses associated with mothballing (under the first scenario), the Draft EIR determined that the County would not proceed with implementing the project under the Rehabilitation Alternative, for both scenarios. Therefore, scenario one and scenario two of the Rehabilitation Alternative was considered infeasible and was not further analyzed in the Draft EIR.

The Adaptive Reuse/Reduced Project (Alternative 4 Scenario 1) would locate a portion of the County uses into 12 selected Primary and Secondary Contributors that may feasibly accommodate the change in use and would be adaptively reused with no new building construction, while all remaining Primary and Secondary Contributors would be mothballed, as described on pages 4-53 to 4-72 of the Draft EIR. This alternative would retain a total of 40 District Contributors. However, as stated on page 4-71, this alternative would not satisfy some of the Project Objectives, but would meet other Project Objectives, although to a lesser extent than the Project.

Since circulation of the Draft EIR, the County has prepared the 2020 Feasibility Study, provided in Appendix L to this Final EIR, which found that all evaluated structures have experienced substantial deterioration since the 2007-2009 Feasibility Studies cited in the Draft EIR due to time, weather, arson-related fires, seismic activity, high winds, water intrusions, soil settlement, and vandalism, which makes rehabilitation and reuse more difficult and costly. In addition, as documented in the 2020 Feasibility Study and discussed above, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural, seismic, and architectural upgrades to bring the historic buildings into serviceable use as required for compliance with Building Codes, as well as seismic, ADA, and Title 24 requirements. Additionally, the majority of the buildings on the South Campus are not good candidates for reuse of County uses because of the lack of sufficient square footage and open floor plans needed to ensure operational efficiency. The County carefully considered whether it would be possible to reuse the two-story wards along Erikson Avenue (LACO Nos. 1184-1188); however, rehabilitating these buildings would result in locating County uses in multiple buildings and thereby fractioning work units, which is contrary to the objective of facilitating proximate and efficient inter-departmental and cross-sector collaboration and providing proximity to other surrounding County facilities. They are also

seismically unsafe and lacking infrastructure for elevators, ADA access, and ADA facilities. In addition, unreinforced masonry buildings are inferior structural systems that would require extensive structure upgrades to meet Building Codes. There would also be security and maintenance challenges due to large spread of buildings across the South Campus. Multiple security guards would be required to man multiple buildings, and each building would have multiple entries to monitor, as opposed to the new construction with one secured manned entry per building. Lastly, the daylight in the historic buildings would be restricted to existing small windows, which would produce a less desirable work space for employees with limited natural lighting, in contrast to the floor to ceiling glass in the new construction, which would produce a more desirable work space for employees with more natural lighting (Hedge, 2018). The 2020 Feasibility Study provided the County with up-to-date information on the various resources in the Historic District to inform findings regarding the feasibility/infeasibility of the various Project alternatives and mitigation measures considered in the EIR with regard to cost, architectural considerations, structural considerations, and ability/inability to meet Project Objectives.

An additional alternative scenario (Alternative 4 Scenario 2) has been evaluated in this Final EIR in response to the Los Angeles Conservancy's comments. This new alternative would relocate a portion of the proposed County uses into selected existing Individually Eligible buildings within the District, which would be adaptively reused, in addition to the new construction proposed under the Project. Refer to Response to Comment No. C3-7 and Chapter 4, *Alternative 4 Scenario 2*, of this Final EIR for a detailed description of this new alternative.

Under Alternative 4 Scenario 2, a portion of the proposed County uses would be relocated into selected existing Individually Eligible buildings within the District which would be adaptively reused, in addition to the new construction proposed under the Project. Specifically, Alternative 4 Scenario 2 would adaptively reuse two Individually Eligible Primary Contributors to include various components of the proposed County uses: (1) LACO No. 1238 (Casa Consuelo) and (2) LACO No. 1300 (Power Plant). LACO No. 1301 (Water Tower), an Individually Eligible Primary Contributor, would be restored, repainted, and seismically upgraded. While it would not be operational upon restoration, the Water Tower would remain on the Project Site and continue to serve as a focal point for the South Campus. LACO No. 1302 (Shop & Laundry), an Individually Eligible Primary Contributor, would be mothballed for future County use. No funding or uses are identified at this time, and this scenario only includes retaining and mothballing the structure. In addition, the Moreton Bay Fig and LACO No. 1100, which is currently occupied by the LASD Professional Standards Division will continue to remain in operation in the same manner. In summary, under Alternative 4 Scenario 2, a total of six of 61 District Contributors would be retained either through adaptive reuse, restoration, mothballing, or retention.

In addition to the buildings to be retained, adaptively reused where indicated, and mothballed, this scenario would also build new construction in the Development Area as proposed under the Project. Similar to the Project, this scenario would construct 650,000 square feet of developed floor area for the ISD Headquarters, Probation Department Headquarters, and County Office Building to accommodate 3,000 employees. This scenario would also develop the ISD/Probation

Parking Structure and County Office Parking Structure, as well as all necessary infrastructure improvements.

The County Board of Supervisors will consider each of the alternatives presented in the Draft EIR, as well as Alternative 4 Scenario 2 presented in the Final EIR, when making their final decision on Project approval.

Letter C5

Chatten-Brown, Carstens & Minter LLP
Amy Minter
2200 Pacific Coast Highway, Suite 318
Hermosa Beach, CA 90254
Letter dated November 21, 2019

Response No. C5-1

The County thanks Chatten Brown, Carstens & Minter LLP for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

The introduction to this comment letter indicates that the comments provided (by Chatten-Brown, Carstens & Minter LLP) are provided on behalf of the Los Angeles Conservancy (the Conservancy). The Los Angeles Conservancy also provided its own comment letter (please refer to the comments and responses provided in Letter C3).

This comment provides information regarding the Rancho Los Amigos Historic District and states that the County has failed in its legal duties to act as a steward of the Historic District. Refer to Response to Comment No. C5-4 below, Response to Comment No. C3-4, and page 2-15 of Chapter 2, *Project Description*, of the Draft EIR for a description of the extensive measures the County has undertaken to prevent deterioration of the Project Site by securing the buildings (in response to ongoing arson and vandalism) and to ensure public safety.

As explained below, and in response to the Letter C3 for the Conservancy, the EIR complies with CEQA, including all requirements for analysis of alternatives.

Response No. C5-2

The commenter asserts that the EIR is legally inadequate in its description of existing conditions and that it fails to support claims regarding the condition of resources or disclose what the commenter characterizes as a legal duty to protect those resources.

As required by CEQA Guidelines Section 15125(c), the Draft EIR provides a comprehensive assessment documenting the baseline existing conditions of the Project Site, which allow the project's significant impacts "to be considered in the full environmental context." The description of existing conditions is also supported by numerous technical studies (appendices to the Draft EIR), namely the Rancho Los Amigos Historic District Analysis Report (provided as Appendix D-1 of the Draft EIR), which provides an exhaustive accounting of the existing physical conditions present on the Project Site and is based on site surveys, historical research, and County records. The condition of these resources is well supported in the EIR. The description of the existing conditions meets the requirements as set forth in CEQA Guidelines Section 15125(a)(1),

which requires an EIR to include a description of the physical environmental conditions as they exist at the time the notice of preparation is published. CEQA Guidelines Section 15125(a) goes on to say that the “description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives.” The commenter provides no information as to how the EIR is insufficient in meeting this requirement.

Regarding the disclosure of the County’s legal duty to protect “those resources,” which is assumed to mean cultural resources, pages 3.4-19 to 3.4-28 of Section 3.4.2, *Regulatory Framework*, of Section 3.4, *Cultural Resources*, of the Draft EIR identifies the various laws and regulations that have been enacted to protect historic resources, including, but not necessarily limited to: (1) National Historic Preservation Act and the National Register of Historic Places; (2) California Register of Historic Resources; (3) State Historical Building Code; (4) California Environmental Quality Act; (5) Los Angeles County Historic Preservation Ordinance; and (6) Los Angeles County General Plan (Conservation and Natural Resources Element). The commenter also claims the County uses the EIR as a post hoc rationalization for its predetermination that nearly the entirety of the Rancho Los Amigos Historic District be demolished. This comment has no bearing on the content and sufficiency of the Project as proposed by the County and evaluated in the EIR. As described above, the County has been attempting to redevelop the South Campus for years. As described in Responses to Comment Nos. C3-2, C3-3, and C3-5, the County has developed and evaluated alternatives that analyze various options related to retaining the Historic District, as well as the preservation and adaptive reuse of buildings, structures, and features.

Response No. C5-3

The commenter summarizes the purpose of CEQA as reflected in CEQA Guidelines Section 15002, which is to “inform governmental decision makers and the public and the potential, significant environmental effects of proposed activities.” The comment also references three published court cases regarding the interpretation of the purpose of CEQA and conveys their concern that the EIR does not adequately disclose, analyze, and mitigate significant adverse environmental effects to the Historic District. A detailed evaluation supported by substantial evidence has been provided in order to support the EIR’s conclusion of significant unavoidable impacts to historical resources, even after the implementation of all feasible mitigation measures, through the analysis provided in Section 3.4, *Cultural Resources*, of the Draft EIR and the supporting Rancho Los Amigos Historic District Analysis Report provided in Appendix D-1. No specific comment regarding the deficiency of this analysis has been provided and, therefore, no additional response is warranted.

Response No. C5-4

The commenter quotes two CEQA court cases addressing the requirements for a proper baseline for CEQA analysis and claims that the Draft EIR fails to provide a complete and supported description of the status of the contributing resources in the Historic District. Refer to Response

to Comment No. C5-2 for a discussion of how the Project's baseline was determined and what information supported the description of the baseline conditions.

The commenter claims that the Draft EIR did not adequately document the poor condition of existing structures but does not indicate what specific information about the status or condition of the contributing resources are allegedly missing. The County conducted a thorough evaluation of the status and condition of structures within the Historic District to develop the baseline for the EIR. This includes a detailed technical evaluation of the conditions of historical resources as presented in Section 3.4, *Cultural Resources*, of the Draft EIR and the supporting Rancho Los Amigos Historic District Analysis Report provided in Appendix D-1. This documentation is based on site surveys and investigations, review of historical documentation, and other County records. The status of the Project Site's historical resources is addressed in Appendix D-1 and summarized in Section 3.4, *Cultural Resources*, of the Draft EIR, as follows: (1) the property's historical integrity is addressed on pages 82 to 86 of Appendix D-1; (2) the eligibility of the District contributors is addressed on pages 87 to 108 of Appendix D-1; and (3) the eligibility of individual buildings and features, including the physical condition of the buildings and features, is provided on pages 109 to 123 of Appendix D-1, which includes photographs showing deterioration. In addition, the County commissioned a Focused Feasibility Study (2020 Feasibility Study) (Harlan et al., 2020) to provide the County with up-to-date information on the various resources in the Historic District to inform findings regarding the feasibility/infeasibility of the various Project alternatives and mitigation measures considered in the EIR with regard to cost, and ability/inability to meet Project Objectives. The 2020 Feasibility Study is provided in Appendix L to this Final EIR.

As further discussed in Responses to Comments Nos. C3-3 and C3-11, the 2020 Feasibility Study found that all evaluated structures have continued to substantially deteriorate since the time of the previous 2007-2009 Feasibility Studies due to time, weather, arson-related fires, seismic activity, high winds, water intrusions, soil settlement, and vandalism. For example, and as supported by evidence contained in Appendix L, LACO Nos. 1300, 1302, and 1184 through 1187 have been subject to water damage and vandalism. LACO Nos. 1101, 1186, 1194, 1204, 1267, and 1287 have been subject to arson. As shown below and as revised in Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of this Final EIR, LACO Nos. 1194 and 1267 were also subject to arson.

Most recently, fires were set at various buildings throughout the Project Site in February 2017 (LACO No. 307/308), June 2017 (LACO No. 1101 and 1287), ~~and~~ July 2017 (LACO No. 1262 and 7704), and July 2019 (LACO No. 1267), and October 2019 (LACO No. 1194).

As a result, many of these buildings have exposed areas, which causes further damage related to weather (such as winds and rain). Additionally, and also as stated in Appendix L of the Final EIR, recent earthquakes (i.e., Northridge earthquake) have necessitated revisions to the building code, resulting in more stringent engineering design and retrofit requirements. In the types of structures on the Project Site, the reinforcement, detailing, material variance, and design would present a high risk of significant damage and risk to occupants during even a moderate seismic event.

Many of the masonry and concrete buildings on the Project Site also have those same risks and concerns. Soil settlement, either caused by or exacerbated by, previous earthquakes have caused damage in LACO Nos. 1189, 1191, 1192, 1262, 1263, and 1301, as discussed in Appendix L.

The commenter references LACC 22.14.080 – H, claiming that this Code section prohibits the County from neglecting resources in a manner that results in deterioration. As also explained in Response to Comment No. C3-4, the commenter appears to be referencing a definition within this Code section of “demolition by neglect,” which states:

Demolition by neglect. The intentional or neglectful failure by an owner, lessee, or other person with possession, care, or control of a landmark or property in an historic district to provide maintenance and repair to the landmark or property which results in one or both of the following:

1. The severe deterioration of exterior features of the landmark or property which renders the landmark or property unsafe as defined in Section 102.1 of Title 26 (Building Code) of the County Code.
2. The severe deterioration of the exterior or interior features of the landmark or property, including but not limited to walls, roofs, chimneys, doors, windows, porches, structural or ornamental architectural elements, or foundations, that is likely to result in permanent damage or loss of any character-defining elements or historic features of the landmark or historic district.

However, “historic district” as used in this context means “[a] contiguous or noncontiguous geographic area containing one or more contributing properties which has been designated as an historic district by the Board pursuant to Chapter 22.124 (Historic Preservation),” and “landmark” means “Any property, including any structure, site, place, object, tree, landscape, or natural feature, that is designated as a landmark by the Board pursuant to Chapter 22.124 (Historic Preservation).” (See LACC 22.14.080-H). Although the Rancho Los Amigos Historic District is determined eligible to the National Register and is listed on the California Register, the County Board has not designated it as a landmark or an historic district, and it is not currently proposed for designation. Therefore, it is not subject to the County’s Historic Preservation Ordinance or this section of the LACC.

The commenter also references text on page 2-15 of Chapter 2, *Project Description*, of the Draft EIR that indicates the buildings are “unsecured.” This statement was not meant to imply that the County has left the buildings unsecured, as the commenter claims; it was meant to indicate the buildings are unoccupied, boarded up, and locked. This revision on page 2-15 of the Draft EIR is shown below and is included Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of the Final EIR.

The ~~unsecured~~ unoccupied, boarded up, and locked buildings in their current condition present a public safety concern. Nearly all of the buildings within the Project Site have been determined to be in poor structural condition. The buildings would require moderate to very complex seismic retrofit and extensive structural upgrades to be brought up to current building code standards. In addition, nearly all of the buildings contain some

amount of hazardous materials, including asbestos-containing materials (ACMs), lead-based paint (LBP), and polychlorinated biphenyls (PCBs). These environmental hazards are located within the buildings but have also extended to the external parts of the buildings (decayed building materials), and pose a potential public and environmental health and safety concern. In addition, one open soil and groundwater contamination case has been filed with the Los Angeles Regional Water Quality Control Board (LARWQCB), which is the result of a prior leaking underground storage tank (UST) that has since been removed. The contamination is located below and around LACO No. 1276 on the western part of the Project Site (**Figure 2-5**). In addition, many of the buildings have been subject to vandalism, water damage, arson-related fire and general exposure.

Refer to Response to Comment C3-4 and page 2-15 of Chapter 2, *Project Description*, of the Draft EIR for a description of the extensive measures the County has undertaken to prevent deterioration of the site by securing the buildings (in response to ongoing arson and vandalism) and to ensure public safety including “fencing off the areas around each of the fire-damaged buildings; installing approximately 2,000 feet of 8-foot high, chain link fence with 200 ‘No Trespassing’ signs around the South Campus; repairing existing fencing; boarding up and/or reinforcing existing boards on all building wall openings in order to secure the buildings; installing 39 strategically-located pole-mounted LED solar lights on aboveground concrete pedestals; installing signage with building numbers on existing structures for ease of identification and to better facilitate emergency response; trimming overgrown trees and bushes along the southwest perimeter of the South Campus; clearing of debris and other potential fire hazards out of the unoccupied buildings; increasing the number of Sheriff’s Department deputies patrolling the South Campus; and having the Sheriff’s Department Aero Bureau conduct periodic airship patrols day and night over the South Campus to detect trespassers with infrared cameras.” The cost of ongoing maintenance measures has been approximately \$1.9 million annually, with additional one-time costs of \$1.3 million, and has required considerable Sheriff and County staff resources (County of Los Angeles, 2020a). Despite these efforts, the Project Site and the buildings continue to be subject to unauthorized human occupation and vandalism. This does not indicate any lack of effort on the County’s part, but rather the difficulty of securing such a large, vacant site with numerous structures, and the persistence of trespassers. The deterioration of the Project Site is not a result of intentional or neglectful acts by the County, as also discussed in detail in Response to Comment No. C3-4.

The commenter claims that the asbestos containing materials and lead based paint do not pose a public safety hazard as they are not “disturbed”. Because some of the buildings at the Project Site have experienced various levels of deterioration, such as crumbling drywall, exposed insulation, or chipping paint, it is possible that asbestos and/or lead-based paint are currently exposed. The 2020 Feasibility Study, provided in Appendix L to the Final EIR, indicated that asbestos is contained in the roofing materials for LACO Nos. 1300/1302, 1204, and 1205 (refer to Appendix L, PDF pages 285, 1076, and 1088, respectively). Lead-based paint is assumed to be present in some or all of the buildings since they were constructed prior to 1978, after which the federal government and the State government banned consumer uses of lead-containing paint.

Further, despite County security efforts, the buildings continue to be entered illegally. Individuals who enter these buildings can be exposed to disturbed hazardous materials, including and beyond, those referenced by the commenter (refer also to Section 3.7, *Hazards and Hazardous Materials*). Additionally, other safety hazards persist, such as unstable structures, fire hazards, uneven surfaces, fallen materials, and general public safety hazards related to interaction between trespassers. In fact, as stated on page 2-15 of Chapter 2, *Project Description*, of the Draft EIR, following each of the fire incidents, the County's Department of Public Works conducted safety assessments of the buildings, each resulting in the Department posting the building unsafe and restricting access.

Response No. C5-5

The commenter references two court cases regarding CEQA's requirements for a legally valid EIR. This comment is noted.

The commenter claims the EIR's discussion of the Historic District is misleading and unsupported regarding the condition and safety hazards present in these resources. Refer to Response to Comment No. C5-4 for a discussion of the status and condition of structures within the Historic District and the existing safety hazards present within the Project site. The commenter does not identify any specific information they believe is missing from the document.

The commenter claims that the Draft EIR assumes the historic resources must be demolished to avoid health and safety impacts without fully disclosing the Project's historic resource impacts. Section 3.4, *Cultural Resources*, of the Draft EIR contains a thorough analysis of the Project's impacts on historic resources, which is supported by the Rancho Los Amigos Historic District Analysis Report that is provided as Appendix D-1 to the Draft EIR. This analysis fully discloses the Project's impacts on historic resources. Additionally, Chapter 4, *Alternatives*, of the Draft EIR analyzed a range of alternatives that would reduce or avoid demolition of the historic resources. The commenter does not identify any specific impact they believe is missing from the analysis. While elimination of public safety concerns associated with the existing unoccupied campus setting including vandalism, arson, theft, structural instability, and habitation by individuals and urban wildlife is one important consideration in determining the appropriate extent of demolition, the County's Project Objectives also include developing County facilities in a safe environment that would increase use of the South Campus by County staff and visitors, and enhance the health and wellbeing of the South Campus as an integral part of the surrounding community; providing an attractive, uncluttered visible gateway to the South Campus from Imperial Highway and establishing a common character and tone for the Campus; and enabling the South Campus to complement and readily adapt to potential future projects in the immediate proximity to the South Campus. Pages 2-17 through 2-18 of Chapter 2, *Project Description*, and pages 4-4 to 4-5 of Chapter 4, *Alternatives*, of the Draft EIR identify the full set of Project Objectives. Refer also to Response to Comment Nos. C3-3 and C3-11 for a discussion of the extensive analysis used to determine the feasibility of retaining various structures.

The commenter states the cultural resources analysis is informationally deficient in that a referenced "memorandum" identifying the character-defining features of the contributing

resources to the Rancho Los Amigos Historic District was not made publicly available with the Draft EIR. The County acknowledges that Appendix K-1, the Character-Defining Features Memorandum, was unintentionally left out of the Draft EIR. However, the information in this memorandum was summarized in the Draft EIR (refer to Section 4.5, Character-Defining Features Analysis of the District in Chapter 4, *Alternatives*), and there was no omission of significant information. Additionally, as soon as the County learned of this oversight, it provided the memorandum to the Conservancy by email on November 14, 2019, and, shortly thereafter, made publicly available on the County's website for the Project at <ftp://dpwftp.co.la.ca.us/pub/pmd/Rancho%20Los%20Amigos%20South%20Campus%20EIR/>. Appendix K-1 is also included as part of the Final EIR. The character-defining features of the Historic District are described appropriately in Appendix D-1 to the Draft EIR in the architectural description, significance analysis, and/or integrity analysis describing the eligibility assessment of individual buildings and features. In addition, character-defining features are also addressed in two appendices of Appendix D-1: Appendix D (Record Sheets) and Appendix G (Previous Evaluations). In addition, character-defining features were also described (relative to the development of alternatives to the Project) in Section 4.5, *Character-Defining Features Analysis of the District*, of Chapter 4, *Alternatives*, of the Draft EIR. The Draft EIR and Appendix D-1 of the Draft EIR were both circulated for public review.

Response No. C5-6

The comment includes quotations from and citations to the CEQA Statute and three court cases regarding the purpose of an alternatives analysis in an EIR. Chapter 4, *Alternatives*, of the Draft EIR analyzes a reasonable range of alternatives and complies with all CEQA requirements. As stated on page 4-8 in Subsection 4.6, Summary of Alternatives, of Chapter 4, *Alternatives*, of the Draft EIR, the Draft EIR includes a range of alternatives that consider varying levels of preservation, adaptive reuse, and demolition, both with and without new construction of the proposed new County facilities on the Project Site for the purpose of reducing significant impacts. Page 4-9 summarizes each of the Project alternatives:

- **Partial Preservation Alternative (Alternative 2, Scenarios 1 and 2).** The Partial Preservation Alternative (Alternative 2) includes two scenarios that would minimize the extent of demolition that would occur on the Project Site and the location of the new proposed County facilities in order to maintain the eligibility of the District to the National Register. Under Scenario 1, all 23 Primary (including the 6 Individual Resources) and all 17 Secondary Contributors would be retained and mothballed, for a total of 40 of 61 District Contributors to be retained (65 percent). Under Scenario 2, all 23 Primary Contributors (including the 6 Individual Resources) would be retained and mothballed, but none of the 17 Secondary Contributors would be retained, for a total of 23 of 61 District Contributors to be retained (37 percent).
- **Reduced Demolition Alternative (Alternative 3).** The Reduce Demolition Alternative also minimizes the extent of demolition that would occur on the Project Site and would limit removal of historic buildings in the District, while supporting the proposed County uses. Eleven (11) Primary Contributors (including the Moreton Bay Fig Tree) and five (5) Secondary Contributors that exemplify and convey the significance of the District would be

retained and mothballed, while 24 other Primary and Secondary Contributors would be demolished. A total of 16 of 61 District Contributors would be retained (26 percent).

- **Adaptive Reuse/Reduced Project (Alternative 4 Scenario 1).** The Adaptive Reuse/Reduced Project Alternative, as described in the Draft EIR, would locate a portion of the County uses into 12 selected Primary and Secondary Contributors that potentially may feasibly accommodate the change in use and would be adaptively reused with no new building construction, while all remaining Primary and Secondary Contributors would be mothballed, for a total of 40 District Contributors to be retained (65 percent). Alternative 4 Scenario 2 is a new alternative evaluated in the Final EIR in response to a comment and is described above.

In addition, as further described in Responses to Comments Nos. C3-2, C3-3, and C3-7, the Final EIR evaluates an additional alternative (Alternative 4 Scenario 2) that would relocate a portion of the proposed County uses into selected existing Individually Eligible buildings within the District, which would be adaptively reused, in addition to the new construction proposed under the Project. A summary of this alternative is provided below, and the complete description and analysis of environmental impacts can be found in Chapter 4, *Alternative 4 Scenario 2*, of this Final EIR:

- **Adaptive Reuse/Reduced Project (Alternative 4 Scenario 2).** Under Alternative 4 Scenario 2, a portion of the proposed County uses would be relocated into selected existing Individually Eligible buildings within the District which would be adaptively reused, in addition to the new construction proposed under the Project. Specifically, Alternative 4 Scenario 2 would adaptively reuse two Individually Eligible Primary Contributors to include various components of the proposed County uses: (1) LACO No. 1238 (Casa Consuelo) and (2) LACO No. 1300 (Power Plant). LACO No. 1301 (Water Tower), an Individually Eligible Primary Contributor, would be restored, repainted, and seismically upgraded. While it would not be operational upon restoration, the Water Tower would remain on the Project Site and continue to serve as a focal point for the South Campus. LACO No. 1302 (Shop & Laundry), an Individually Eligible Primary Contributor, would be mothballed for future County use. No funding or uses are identified at this time, and this scenario only includes retaining and mothballing the structure. In addition, the Moreton Bay Fig will remain, and LACO No. 1100, which is currently occupied by the LASD Professional Standards Division will continue to remain in operation in the same manner.

In addition to the buildings to be retained, adaptively reused where indicated, and mothballed, this scenario would also include new construction in the Development Area as proposed under the Project. Similar to the Project, this scenario would construct up to 650,000 square feet of floor area for the ISD Headquarters, Probation Department Headquarters, and County Office Building. This scenario would also develop the ISD/Probation Parking Structure and County Office Parking Structure, as well as all necessary infrastructure improvements, and include remediation of contaminated groundwater. As stated within Chapter 2, *Project Description*, of the Draft EIR, the new construction on the Project Site would utilize the design-build process, and due to this evolving process, it was determined that the ancillary and support spaces within the ISD and Probation Department Headquarters buildings would be increased to offer more collaborative spaces for the County employees. Therefore, employees under this scenario would be moved to the adaptively reused buildings.

In summary, Alternative 4 Scenario 2 would retain a total of six (6) Individually Eligible buildings and structures through either adaptive reuse, restoration, mothballing, or retention.

This alternative has been included in the Final EIR, and will be considered by the Board of Supervisors as an alternative to the Project.

Additionally, the Draft EIR considered three alternatives that would retain the historic significance of the District and/or repurpose buildings but rejected these as infeasible based on substantial evidence in the record and explained on pages 4-10 through 4-18, prior to detailed analysis in the Draft EIR. These alternatives include the Offsite Alternative, Full Preservation Alternative, and the Rehabilitation Alternative (both scenarios). The comment also correctly summarizes the significant and unavoidable impacts of the Project as identified in the EIR and includes additional references to CEQA and relevant case law. The commenter also references California Public Resources Code Section 21081, which provides that if one or more significant impacts of the Project will not be avoided or substantially lessened by adopting mitigation measures, environmentally superior alternatives described in the EIR must be found infeasible if they are not adopted and requires an agency to prepare a statement of overriding considerations for significant impacts that are not mitigated, indicating that the benefits of the project outweigh its significant effects on the environment. Both the findings and statement of overriding considerations must be supported by substantial evidence in the record. The County Board of Supervisors, should they choose to adopt the Project or an alternative, will make (and adopt) the appropriate findings and statement of overriding considerations. Further, the findings will address the feasibility for each of the Project's alternatives that were evaluated in detail in the EIR.

Please also refer to Responses to Comment Nos. C3-2, C3-3, and C3-5 for a discussion of the alternatives the County developed to analyze various options related to retaining the Historic District, as well as the preservation and adaptive reuse of buildings, structures, and features. Refer specifically to Response to Comment No. C3-7 for a discussion of the alternative analyzed in the Final EIR in response to comments provided by the Conservancy.

Response No. C5-7

The commenter questions why buildings to be retained in the Partial Preservation Alternative (Alternative 2) are not proposed for reuse by other County uses or public uses and provides a number of examples. As indicated on page 2-46 of Chapter 2, Project Description, of the Draft EIR, the County has no other planned or foreseeable County projects (or funds available) to develop the remaining parts of the South Campus. The Rancho Los Amigos South Campus is the last remaining County-owned land that could allow construction of new facilities for County uses in the future. By allowing a public private partnership (P3) project or long lease to a developer, the County would lose long-term control over this land for future County uses. Maintaining the land for County uses also eliminates the need for the County to use tax dollar to acquire buildings or land for County facilities in other locations.

It is currently unknown what or when development might occur on the remaining available 39-acres of the 74-acre area of the Rancho Los Amigos South Campus, and any estimate of future development would be purely speculative (refer also to Responses to Comments Nos. B5-3, B5-12, and B5-13). However, the South Campus will be evaluated as part of the Rancho Los Amigos South Campus Specific Plan, which is currently under preparation by the City of Downey. In addition, the Future with Project traffic analysis includes an ambient annual growth factor of 1.0 percent that is attributed to overall regional growth both inside and outside of the transportation study area, which accounts for projects that were not known, and could not be known, when this analysis was prepared (that is, projects where applications were not yet submitted when the cumulative analysis was prepared).

The commenter correctly summarizes the components of the Partial Preservation Alternative (Alternative 2) and the comparative levels of impacts to the Proposed Project. The commenter states that the EIR does not provide any information to support a claim that Alternative 2 would not be economically feasible. CEQA requires an EIR to analyze “potentially feasible” alternatives, but the EIR is not the appropriate place to determine the ultimate feasibility of a project or alternatives other than those rejected as infeasible at the Draft EIR stage and not carried forward for analysis. The purpose of the EIR, as required by CEQA Guidelines Section 15126.6, is to describe a reasonable range of potentially feasible alternatives to the project that could attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The EIR meets these obligations.

Under Scenario 1, all 23 Primary Contributors, including 6 Individually Eligible Resources, and all 17 Secondary Contributors would be retained and mothballed, for a total of 40 of 61 District Contributors to be retained (65 percent). Scenario 1 would maintain the eligibility of the District to the National Register. No buildings or structures would be adaptively reused. Under Scenario 2, all 23 Primary Contributors (37 percent), including 6 Individually Eligible Resources, would be retained and mothballed. However, none of the 17 Secondary Contributors would be retained and mothballed. No buildings or structures would be adaptively reused. Although the historic associations of the District that convey its significance would still be embodied by the individual resources and the Primary Contributors, the overall District context would be materially impaired, and Scenario 2 would not maintain the eligibility of the District to the National Register.

Therefore, Alternative 2 is a program for retention of certain buildings using a mothballing approach. As stated on page 1 of Summary D, Summary of Mothballing Reports, provided in Appendix L of the Final EIR, mothballing describes a short-term goal, and not a long-term building rehabilitation effort. Preservation Brief #31, which is published by the U.S. Department of the Interior, describes the steps that are entailed in the process of mothballing a building to protect it for a period of up to ten years (Sharon C. Park, 1993). However, as also described in that publication, the long-term success of any mothballing endeavor “will also depend on continued, although somewhat limited, monitoring and maintenance.” Finally, it is also important to note that mothballing will not provide the longer cycle performance that characterizes a

restoration or a rehabilitation project since mothballing is intended to only serve as an interim measure to protect unused buildings until such time that a new use is found for them.

As further stated on page 2 of Summary D, Summary of Mothballing Reports, provided in Appendix L of the Final EIR, the mothballing process as described in Preservation Brief #31 has four main components that are applicable to the subject property, as follows (1) documentation and recordation of buildings to be mothballed; (2) the preparation of a condition assessment for buildings to be mothballed; (3) the stabilization of buildings to be mothballed; and (4) the actual mothballing of buildings. Each of these components, or steps, is intended to be performed in sequential order in the effort to mothball an individual building or a grouping of buildings.

In terms of the project approval process, Public Resources Code Section 21081 provides that if one or more significant impacts of the Project will not be avoided or substantially lessened by adopting mitigation measures, environmentally superior alternatives described in the EIR must be found infeasible if they are not adopted and requires an agency to prepare a statement of overriding considerations for significant impacts that are not mitigated, indicating that the benefits of the project outweigh its significant effects on the environment. Therefore, when the County Board of Supervisors considers approval of the Project or an alternative to the Project, considerations related to feasibility of Project alternatives, including economic (or cost), environmental, legal, social, and technological factors will be considered. The EIR does not suggest, as the commenter does, that Alternative 2 is rejected because it does not meet the Project Objectives to the same extent as the proposed Project or fails “to meet the exact design of the proposed Project.” Lastly, the commenter indicates that the County cannot provide alternatives “designed to fail” in order to favor the proposed Project. Section 4.2, *CEQA Requirements for Alternatives Analysis*, of the Draft EIR describes the process by which the alternatives were selected, in compliance with the requirements of CEQA. Section 4.7, *Alternatives Considered but Rejected*, and Section 4.8, *Alternatives to the Proposed Project*, present the alternatives that were evaluated in the EIR, also in compliance with the requirements of CEQA, which are to provide a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. In addition, the Final EIR includes an additional alternative scenario in response to the Conservancy’s comments (Alternative 4 Scenario 2) that would relocate a portion of the proposed County uses into selected existing Individually Eligible buildings within the District which would be adaptively reused, in addition to the new construction proposed under the Project.

Response No. C5-8

The commenter summarizes the components of the Reduced Demolition Alternative (Alternative 3) and the comparative levels of impacts to the Proposed Project. The comment claims that the EIR does not provide sufficient economic information to support a claim that Alternative 3 is economically infeasible (specifically related to mothballing).

While the Alternative 3 would have a reduced level of demolition of Contributors within the District, the integrity of the District would still be substantially changed, resulting in a significant

unavoidable impact. A large part of the District, including a total of 24 Primary and Secondary Contributors inside the Development Area, as well as 21 Tertiary Contributors and all 48 Non-Contributors in the Development Area and throughout the rest of the Project Site, would be removed. A total of 14 District Contributors (24 percent) would be retained and mothballed, including five (5) Primary Contributors within the boundaries of the Development Area and five (5) Primary and four (4) Secondary Contributors outside of the Development Area boundaries. The context of the remaining resources would be altered by removal of a majority of the Contributors in the District, and potential indirect impacts would also result from the proximate presence of the new ISD and Probation Department Headquarters and County Office Building, which would alter the historic setting of the District. Nonetheless, the Individually Eligible buildings would be retained intact and their current status as historical resources would be unchanged. While implementation of Mitigation Measures MM-CUL-1a, CUL-1b, and CUL-1c, would create a publicly accessible historical record of Rancho Los Amigos, impacts to the District under Alternative 3 would remain significant and unavoidable. All remaining Individually Eligible buildings and Primary and Secondary Contributors would require mothballing, including structural stabilization, pest control measures, weatherization, adequate ventilation, and security measures. While implementation of the mothballing process could cause potential damage and the long term vacancy and deterioration could result in loss of integrity, these impacts would be reduced with the implementation of Mitigation Measure MM-CUL-1d, which requires implementation of a Mothballing Plan in accordance with National Park Service guidelines. The potential for inadvertent impacts to the retained District Contributors and Individually Eligible buildings due to the close proximity of construction for the new County buildings would be avoided by conformance with the Secretary of Interior Standards 9 and 10. Clarification in the Draft EIR is necessary to ensure consistency with the Project. Revision on page 4-45 of the Draft EIR is shown below and is included Chapter 3, *Revisions, Clarifications, and Corrections to the Draft EIR*, of the Final EIR.

Initially, the main approach to the property was from the east along Consuelo Street until Imperial Highway was established to the north in 1931. After 1931, the main approach to the South Campus was from the north along Erickson Avenue. Potential impacts to the setting caused by the new construction would be further reduced through compliance with the Secretary of Interior's Standards 9 and 10, by the implementation of mitigation measure MM-CUL-1f, which requires a plan review of the Project ensuring the new construction to ensure it is compatible with the District and its remaining Contributors.

Comparison of the costs of rehabilitation versus mothballing was studied in the 2020 Feasibility Study. Due to the high cost of repurposing and rehabilitating a relatively large number of historic buildings, and because there is no County use proposed for the historic buildings, it was determined that this alternative would only be potentially feasible if the historic buildings would be mothballed. While the costs of mothballing are lower than adaptive reuse or new construction, substantial ongoing maintenance and security costs would still be required, resulting in low value to the County for the overall cost. As mentioned in Response to Comment No. C5-4, the annual cost of these ongoing maintenance and security costs has been approximately \$1.9 million with additional one-time costs of \$1.3 million, and has also required considerable Sheriff and County staff resources (County of Los Angeles, 2020a). Further, as mentioned in Response to Comment

No. C5-7, mothballing is intended to only serve as an interim measure to protect unused buildings until such time that a new use is found for them.

As explained in Response to Comment No. C5-7, an EIR is not required to include determinations regarding the ultimate feasibility of a project or alternatives other than those rejected as infeasible at the Draft EIR stage and not carried forward for analysis. The purpose of Project alternatives is to provide a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, as stated in Response to Comment No. C5-7. As further discussed in Response to Comment No. C3-3, information regarding feasibility is provided in the EIR; however, the findings will be the ultimate document that provides substantial evidence for any findings of infeasibility.

Response No. C5-9

The commenter summarizes the components of the Adaptive Reuse Alternative (Alternative 4) and the comparative levels of impacts to the Proposed Project, including the EIR's determination that it would serve as the Environmentally Superior Alternative. The commenter claims that the EIR does not provide sufficient economic information to support a claim that Alternative 4 would not be economically feasible. Refer to Responses to Comment Nos. C3-3, C3-7, and C3-8 for a discussion of the approval process and the determination of the feasibility of Project alternatives.

In terms of costs, and as discussed in Response to Comment No. C3-11, **Table C3-2** provides the estimated costs for preservation/adaptive reuse or mothballing of the Primary Individually Eligible buildings and the Primary and Secondary Contributors as of January 2020, as well as the costs associated with each of the Project alternatives evaluated in the Final EIR. Appendix L of the Final EIR includes additional details about the specific costs related to each individual building and the challenges of rehabilitating these structures to occupational standards. Appendix L of the Final EIR evaluates both the preservation/adaptive reuse and mothballing approaches relative to architectural and structural conditions, costs, and mothballing requirements.

When considering approval of the proposed Project and in making their findings, the County Board of Supervisors will take into account the various economic, environmental, social, legal, technical, and other considerations regarding the feasibility of the Project and each alternative. This includes the cost information provided herein and as detailed in the 2020 Feasibility Study provided in Appendix L to this Final EIR. The commenter mentions the State Historic Tax Credit bill. This bill creates a 20 percent state tax credit for the rehabilitation of historic structures listed on the California Register of Historic Places. To the extent applicable, the County may consider this and any other financial incentives applicable to the Project; however, this recommendation does not pertain to the environmental effects of the Project. Additionally, the feasibility and costs associated with rehabilitation of each of the Primary and Secondary Contributors for adaptive reuse was studied in the 2020 Feasibility Study, which considered and incorporated financial incentives such as the State Historic Tax Credit that is applicable to the Project.

Alternative 4 (Scenario 1) involves the adaptive reuse and/or mothballing of all Primary and Secondary Contributors, while 21 Tertiary Contributors and 48 Non-Contributors would be demolished, for a total of 40 District Contributors to be retained (65 percent). As explained in Response to Comment No. C3-12, the adaptive reuse of District resources involves multiple complex considerations, including upgrades to meet the requirements of the Building Code, which also includes seismic structural upgrades, the ADA, and Title 24. Furthermore, the adaptive reuse of these buildings is not desirable from an architectural programming and design perspective along with the location of the historic buildings from a programming perspective within the context of the overall County development project (i.e., proximity of buildings to one another).

The commenter also states that the removal of tertiary and non-contributing buildings would leave large areas of the southwest Project Site and along the east side of Erickson Avenue open for new construction. Development in the area east of Erickson Avenue and north of Bonita Street would require the removal of a number of trees and would affect the Site Plan, which is a Contributor to the District. The existing open landscape in this area is a contributing characteristic of the Historic District's Site Plan and is important to preserve the integrity of the selected resources to be retained. In addition, this open space area, which is adjacent to the location of the separate Rancho Los Amigos Sports Center project (cumulative project number 4 in the Draft EIR), is a compatible land use transition and buffer for the future park uses. In addition, development outside of the Project Site (or Development Area) would require the extension of infrastructure, which would involve additional costs. For example, the County indicates that it would cost over \$1 million to run high voltage electrical power, telecommunications, sewer, and domestic water to this area and approximately \$175,00 for geotechnical investigations (County of Los Angeles, 2020b). In addition, there would be additional costs associated with civil surveys, utility surveying, and trenching down Erickson Avenue, which would require repaving the street.

Response No. C5-10

The commenter suggests the EIR consider an alternative that includes both new construction and adaptive reuse. As discussed above, the Final EIR includes an additional alternative scenario in response to the Conservancy's comments (Alternative 4 Scenario 2) that would relocate a portion of the proposed County uses into selected existing Individually Eligible buildings within the District which would be adaptively reused, in addition to the new construction proposed under the Project. As described in Response to Comment No. C3-2, this alternative is being evaluated in the Final EIR and, as such, will be considered by the Board of Supervisors as an alternative to the Project as part of the approval process.

Response No. C5-11

The commenter presents a close to their comment letter. No further response is necessary.

Letter C6

West Hollywood Preservation Alliance
Victor Omelczenko, Board President
Letter dated November 21, 2019

Response No. C6-1

The County thanks the West Hollywood Preservation Alliance for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This introductory comment states the commenter's agreement with the Los Angeles Conservancy's stance for the County to adaptively reuse the historic buildings on the Project Site.

The Draft EIR considered two alternatives that include the adaptive reuse of various buildings. As discussed in Chapter 4, *Alternatives*, of the Draft EIR, adaptive reuse was considered for the Rehabilitation Alternative and two scenarios of an Adaptive Reuse/Reduced Project Alternative. In addition, as further discussed in Response to Comment No. C3-7, a new alternative has been identified that would increase adaptive reuse and preservation opportunities on the Project Site as compared to the proposed Project, while providing for new construction.

With regard to the Rehabilitation Alternative, two scenarios were considered. Under the first scenario, the District's Individually eligible resources and the Primary Contributors would be adaptively reused for County office uses, while the Secondary Contributors would be mothballed. Under the second scenario, the Individual Resources, Primary Contributors, and Secondary Contributors would all be rehabilitated and adaptively reused for office uses.

Scenario 1 of the Rehabilitation Alternative was rejected as infeasible on pages 4-16 and 4-17 of the Draft EIR. While the "spirit and intent" of historic preservation would be met by Scenario 1 of the Rehabilitation Alternative for the some of the District's resources including the Individual Resources and Primary Contributors that are of highest cultural value, none of the Secondary Contributors would be adaptively reused and they would continue to be susceptible to deterioration, intrusion and vandalism. Furthermore, none of the other County's Project Objectives would be met. In addition, this Rehabilitation Alternative would be extremely costly to implement and would also incur on-going maintenance, repair and security expenses associated with mothballing. As shown below in **Table C3-2**, the cost of adaptively reusing the Primary Contributors would be \$186,781,000, and the cost of mothballing the Secondary Contributors would be \$5,853,000, resulting in a total cost for Scenario 1 of the Rehabilitation Alternative to \$192,634,000.

Scenario 2 of the Rehabilitation Alternative was similarly rejected as infeasible on page 4-17 of the Draft EIR. Like Scenario 1, Scenario 2 would meet the "spirit and intent" of historic preservation. However, Scenario 2 would cost more than \$178 to \$218 million in 2007 dollars

(and more now) and would require County uses to be installed in approximately 35 separate rehabilitated historic buildings, which would conflict with the majority of the County's Project Objectives. As shown below in **Table C3-2**, the cost of adaptively reusing both the Primary and Secondary Contributors would be \$462,197,000.

In summary, while the "spirit and intent" of historic preservation would be met by both scenarios one and scenario two of the Rehabilitation Alternative, for the some of the District's resources including the Individual Resources and Primary Contributors that are of highest cultural value, none of the Secondary Contributors would be adaptively reused (under the first scenario), most of the County's Project Objectives would be met. Since this Rehabilitation Alternative, under both scenarios, would be extremely costly to implement, would not achieve most of the County's objectives, and also would incur on-going maintenance, repair and security expenses associated with mothballing (under the first scenario), the Draft EIR determined that the County would not proceed with implementing the project under the Rehabilitation Alternative, for both scenarios. Therefore, scenario one and scenario two of the Rehabilitation Alternative was considered infeasible and was not further analyzed in the Draft EIR.

The Adaptive Reuse/Reduced Project (Alternative 4 Scenario 1) would locate a portion of the County uses into 12 selected Primary and Secondary Contributors that may feasibly accommodate the change in use and would be adaptively reused with no new building construction, while all remaining Primary and Secondary Contributors would be mothballed, as described on pages 4-53 to 4-72 of Chapter 4, *Alternatives*, of the Draft EIR. This alternative would retain a total of 40 District Contributors. However, as stated on page 4-71, this alternative would not satisfy some of the Project Objectives, but would meet other Project Objectives, although to a lesser extent than the Project.

Since circulation of the Draft EIR, the County has prepared the 2020 Feasibility Study, provided in Appendix L to this Final EIR, which found that all evaluated structures have experienced substantial deterioration since the 2007-2009 Feasibility Studies cited in the Draft EIR due to time, weather, arson-related fires, seismic activity, high winds, water intrusions, soil settlement, and vandalism, which makes rehabilitation and reuse more difficult and costly. In addition, as documented in the 2020 Feasibility Study and discussed above, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural, seismic, and architectural upgrades to bring the historic buildings into serviceable use as required for compliance with Building Codes, as well as seismic, ADA, and Title 24 requirements. Additionally, the majority of the buildings on the South Campus are not good candidates for reuse of County uses because of the lack of sufficient square footage and open floor plans needed to ensure operational efficiency. The County carefully considered whether it would be possible to reuse the two-story wards along Erikson Avenue (LACO Nos. 1184-1188); however, rehabilitating these buildings would result in locating County uses in multiple buildings and thereby fractioning work units, which is contrary to the objective of facilitating proximate and efficient inter-departmental and cross-sector collaboration and providing proximity to other surrounding County facilities. They are also seismically unsafe and lacking infrastructure for elevators, ADA access, and ADA facilities. In addition, unreinforced masonry buildings are inferior structural systems that would require extensive structure upgrades to meet Building Codes. There would also be security and

maintenance challenges due to large spread of buildings across the South Campus. Multiple security guards would be required to man multiple buildings, and each building would have multiple entries to monitor, as opposed to the new construction with one secured manned entry per building. Lastly, the daylight in the historic buildings would be restricted to existing small windows, which would produce a less desirable work space for employees with limited natural lighting, in contrast to the floor to ceiling glass in the new construction, which would produce a more desirable work space for employees with more natural lighting (Hedge, 2018). The 2020 Feasibility Study provided the County with up-to-date information on the various resources in the Historic District to inform findings regarding the feasibility/infeasibility of the various Project alternatives and mitigation measures considered in the EIR with regard to cost, architectural considerations, structural considerations, and ability/inability to meet Project Objectives.

An additional alternative scenario (Alternative 4 Scenario 2) has been evaluated in this Final EIR in response to the Los Angeles Conservancy's comments. This new alternative would relocate a portion of the proposed County uses into selected existing Individually Eligible buildings within the District, which would be adaptively reused, in addition to the new construction proposed under the Project. Refer to Response to Comment No. C3-7 and Chapter 4, *Alternative 4 Scenario 2*, of this Final EIR for a detailed description of this new alternative.

Under Alternative 4 Scenario 2, a portion of the proposed County uses would be relocated into selected existing Individually Eligible buildings within the District which would be adaptively reused, in addition to the new construction proposed under the Project (see Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). Specifically, Alternative 4 Scenario 2 would adaptively reuse two Individually Eligible Primary Contributors to include various components of the proposed County uses: (1) LACO No. 1238 (Casa Consuelo) and (2) LACO No. 1300 (Power Plant). LACO No. 1301 (Water Tower), an Individually Eligible Primary Contributor, would be restored, repainted, and seismically upgraded. While it would not be operational upon restoration, the Water Tower would remain on the Project Site and continue to serve as a focal point for the South Campus. LACO No. 1302 (Shop & Laundry), an Individually Eligible Primary Contributor, would be mothballed for future County use. No funding or uses are identified at this time, and this scenario only includes retaining and mothballing the structure. In addition, the Moreton Bay Fig and LACO No. 1100, which is currently occupied by the LASD Professional Standards Division will continue to remain in operation in the same manner. In summary, under Alternative 4 Scenario 2, a total of six of 61 District Contributors would be retained either through adaptive reuse, restoration, mothballing, or retention.

In addition to the buildings to be retained, adaptively reused where indicated, and mothballed, this scenario would also build new construction in the Development Area as proposed under the Project. Similar to the Project, this scenario would construct 650,000 square feet of developed floor area for the ISD Headquarters, Probation Department Headquarters, and County Office Building to accommodate 3,000 employees. This scenario would also develop the ISD/Probation Parking Structure and County Office Parking Structure, as well as all necessary infrastructure improvements.

The County Board of Supervisors will consider each of the alternatives presented in the Draft EIR, as well as Alternative 4 Scenario 2 presented in the Final EIR, when making their final decision on Project approval.

This comment also accurately describes that the Project Site includes buildings that are listed in the California Register of Historical Resources and is eligible for listing as a historic district on the National Register of Historic Places, as stated on pages 3.4-9 through 3.4-15 in Section 3.4, *Cultural Resources*, of the Draft EIR and described further in the *Rancho Los Amigos Historic District Analysis Report*, which is included as Appendix D-1 in the Draft EIR. The comment also correctly states that the proposed Project would demolish over 50 historic buildings, as reflected on page 2-20 of the Draft EIR.

Response No. C6-2

This comment provides examples of other similar historic sites and campuses with historic buildings that were repurposed. The comment does not raise significant environmental issues or address the adequacy of the EIR or CEQA process. Thus, no further response is required.

Response No. C6-3

This comment also provides a conclusion to the commenter's letter, and no specific response is required.

Letter D1

James Fountain
je.fountain@hotmail.com
7814 Adoree Street
Downey, CA 90242
Email dated October 15, 2019

Response No. D1-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment acknowledges receipt of the NOA and provides a background on the commenter. As this comment does not raise significant environmental issues, no further response is required.

Response No. D1-2

This comment restates the commenter's comments received on the NOP regarding "traffic, high-rise buildings, and garage issues." The analysis of potential transportation and traffic impacts related to the Project is provided in Section 3.11, *Transportation*, and Appendix H, Traffic Impact Study, of the Draft EIR.

The analysis of traffic impacts was prepared based on the existing setting at the time the NOP was issued related to the preparation of the Draft EIR (refer to Appendix A of the Draft EIR). As noted in the comment and discussed on page 15 of the Traffic Impact Study, Gardendale Street provides one through travel lane in each direction. Figure 3.11-1 of Section 3.11, *Transportation*, in the Draft EIR indicates the location of the study intersections evaluated for potential traffic impacts due to the Project. As shown on Figure 3.11-1, Intersection Nos. 6, 8 15, 16, 17, 20, 23, 24 and 26 are located along Gardendale Street. Tables 3.11-6 and 3.11-8 in the Draft EIR summarize the traffic analysis prepared for the Existing with Project and Future with Project conditions, respectively. Table 3.11-9 of the Draft EIR provides a summary of the intersections calculated to be significantly impacted by traffic due to the Project. As shown in Table 3.11-9, four intersections along Gardendale Street are forecast to be significantly impacted by traffic due to the Project: No. 15 Industrial Avenue / Gardendale Street, No. 16 Erickson Avenue / Gardendale Street, No. 17 Arizona Avenue / Gardendale Street, and No. 20 Paramount Boulevard / Gardendale Street.

Potential mitigation measures to alleviate the significant traffic impacts at all of the affected intersections are described on page 3.11-27. As described on page 3.11-29 in the Draft EIR, these intersections are outside the jurisdiction of the Lead Agency (the County) as they are located in the cities of Downey, South Gate, and/or Paramount. Therefore, for each mitigation measure identified in the Draft EIR, its implementation cannot be guaranteed. Therefore, each of the

impacts at the affected intersections along Gardendale Street are considered in the Draft EIR to be significant and unavoidable.

The project referenced in the comment that reduced Gardendale Street from the original four lanes to the current two lane configuration was completed in 2015 (Los Angeles Wave Newspapers, 2015) and was a joint effort of the cities of Downey, South Gate and Paramount. Following implementation of the cities' project, Gardendale Street now provides one through vehicle travel lane in each direction, a center two-way left-turn lane, and one bike lane in each direction. The County understands that implementation of the Gardendale Street project involved extensive review and discussion among the affected cities. It is beyond the jurisdiction of the County to reverse the Gardendale Street project and revert the roadway striping to its prior pre-2017 condition. However, the suggestion to return Gardendale Street to providing two travel lanes in each direction will be forwarded to the decision-maker for review and consideration.

Figure 3.11-1 in the Draft EIR demonstrates that westbound and eastbound intersections of Imperial Highway at Erickson Avenue (Nos. 13 and 14, respectively) were evaluated for potential traffic impacts due to the Project. Tables 3.11-6 and 3.11-8 in the Draft EIR summarize the traffic analysis prepared for the Existing with Project and Future with Project conditions, respectively. As shown in Tables 3.11-6 and 3.11-8, the impacts related to Project traffic at Intersection No. 13 Erickson Avenue / W. Imperial Highway and No. 14 Erickson Avenue / E. Imperial Highway are calculated to be less than significant. Therefore, no traffic mitigation measures are required for the Erickson Avenue / Imperial Highway intersections. Thus, the request in the comment to improve access at this location is not required.

Regarding the sightlines for the single-family neighborhood east of the Project Site, as stated on page 3.1-22 of Section 3.1, *Aesthetics*, of the Draft EIR, the single-family homes to the east would be impacted by the construction of the ISD Department Headquarter and Probation Department Headquarter Building(s) and the ISD/Probation Parking Structure even though views of the construction would be only partially visible. Activities and equipment related to demolition, grading, construction of buildings and improvements would be temporary in nature and only partially visible given the interior location of construction within the Project Site and fencing. As such, environmental impacts to existing visual character or quality during temporary construction and demolition of the proposed Project would be less than significant. During Project operation, the new buildings would serve as the core of the Project Site and would be connected by the new landscaping features and zones between the buildings. The Water Tower (LACO No. 1301) would remain on-site and at 100 feet, would still remain a unique visual focal point. Although the new buildings would not be compatible with the size, scale, and proportion of the existing buildings, the new buildings would provide a landscaped new development with visual variety to the Project Site.

Letter D2

Nancy Webber

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Email dated October 22, 2019

Response No. D2-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment recommends preservation of all of the historic buildings in the area. As stated on page 4-8 of Chapter 4, *Alternatives*, of the Draft EIR, a total of six (6) alternatives to the Project, two of which were considered but were not selected for further analysis, and the remaining four of which, including the "no project" alternative and three other "build" alternatives, are comprehensively evaluated. Of the six alternatives, five alternatives (excluding the No Project Alternative) provide some form of preservation as part of the proposed alternative, whether in the form of mothballing or as adaptive reuse. The proposed Project would retain four individually eligible historic buildings, structures, and features including LACO Nos. 1100 (Administration/Safety Police Building), 1238 (Casa Consuelo), 1301 (Water Tower), plus the Moreton Bay Fig Tree. In addition, the County considered a Full Preservation Alternative and a Rehabilitation Alternative, which are discussed in Chapter 4, *Alternatives*, of the Draft EIR. While these alternatives would have preserved more buildings on the Project Site as suggested by the commenter and would meet the spirit and intent of historic preservation, based on the Rancho Los Amigos Historic District Tier 1- 4 Feasibility Studies (2007-2009 Feasibility Studies) referenced therein, these alternatives were determined to be infeasible due to cost, susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures, and inability to meet the Project Objectives. Therefore, these alternatives were initially considered but rejected from further analysis.

Additionally, the Draft EIR evaluates three alternatives with varying levels of retention of the existing structures: Alternative 2, Partial Preservation Alternative (both scenarios), Alternative 3, Reduced Demolition Alternative, and Alternative 4, Adaptive Reuse/Reduced Project Alternative, including an additional scenario under Alternative 4 as revised in this Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for a full description and analysis). All include a scenario in which the some of the buildings within the District are partially retained and mothballed and/or adaptively reused.

Subsequent to the publication of the Draft EIR, the County recognized that more up-to-date information was necessary to determine whether the alternatives carried forward for analysis in the Draft EIR would be feasible today given considerations related to architectural and structural conditions, mothballing requirements, and cost. Therefore, the County commissioned a Focused Feasibility Study (2020 Feasibility Study) (Harlan et al., 2020) to address the current

requirements and costs of rehabilitating and adaptively reusing historical resources for current County needs, as well as determining the costs for mothballing. The 2020 Feasibility Study is provided in Appendix L to this Final EIR. As documented in the 2020 Feasibility Study, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural, seismic, and architectural upgrades to bring the historic buildings into serviceable use as required for compliance with Building Codes, as well as seismic, ADA, and Title 24 requirements. Additionally, the majority of the buildings on the South Campus are not good candidates for reuse because of the lack of sufficient square footage and open floor plans.

Based upon information provided in the 2020 Feasibility Study, it was determined that a select group of additional historic structures are feasible for adaptive reuse and preservation. These structures were incorporated into Scenario 2 under Alternative 4 in the Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). A total of six of 61 District Contributors would be retained either through adaptive reuse, restoration, mothballing, or retention under Alternative 4 Scenario 2. The County Board of Supervisors will consider each of the alternatives, along with information in the record including but not limited to the 2020 Feasibility Study, when making their final decision on Project approval.

The commenter has included the Los Angeles Conservancy in the transmission of their comments to the County. Please refer to responses to the Los Angeles Conservancy in Letter No. C3 for responses to comments provided by this organization.

Letter D3

Carlos Cordoba

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Email dated October 22, 2019

Response No. D3-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment recommends preservation and restoration of Rancho Los Amigos and the need to safeguard its cultural and architectural heritage. The proposed Project would retain four individually eligible historic buildings, structures, and features including LACO Nos. 1100 (Administration/Safety Police Building), 1238 (Casa Consuelo), 1301 (Water Tower), plus the Moreton Bay Fig Tree. In addition, the County considered a Full Preservation Alternative and a Rehabilitation Alternative, which are discussed in Chapter 4, *Alternatives*, of the Draft EIR. While these alternatives would have preserved more buildings on the Project Site as suggested by the commenter and would meet the spirit and intent of historic preservation, based on the Rancho Los Amigos Historic District Tier 1- 4 Feasibility Studies (2007-2009 Feasibility Studies) referenced therein, these alternatives were determined to be infeasible due to cost, susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures, and inability to meet the Project Objectives. Therefore, these alternatives were initially considered but rejected from further analysis.

Additionally, the Draft EIR evaluates three alternatives with varying levels of retention of the existing structures: Alternative 2, Partial Preservation Alternative (both scenarios), Alternative 3, Reduced Demolition Alternative, and Alternative 4, Adaptive Reuse/Reduced Project Alternative, including an additional scenario under Alternative 4 as revised in this Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for a full description and analysis). All include a scenario in which the some of the buildings within the District are partially retained and mothballed and/or adaptively reused.

Subsequent to the publication of the Draft EIR, the County recognized that more up-to-date information was necessary to determine whether the alternatives carried forward for analysis in the Draft EIR would be feasible today given considerations related to architectural and structural conditions, mothballing requirements, and cost. Therefore, the County commissioned a Focused Feasibility Study (2020 Feasibility Study) (Harlan et al., 2020) to address the current requirements and costs of rehabilitating and adaptively reusing historical resources for current County needs, as well as determining the costs for mothballing. The 2020 Feasibility Study is provided in Appendix L to this Final EIR. As documented in the 2020 Feasibility Study, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural, seismic, and architectural upgrades to bring the historic buildings into serviceable use as required

for compliance with Building Codes, as well as seismic, ADA, and Title 24 requirements. Additionally, the majority of the buildings on the South Campus are not good candidates for reuse because of the lack of sufficient square footage and open floor plans.

Based upon information provided in the 2020 Feasibility Study, it was determined that a select group of additional historic structures are feasible for adaptive reuse and preservation. These structures were incorporated into Scenario 2 under Alternative 4 in the Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). A total of six of 61 District Contributors would be retained either through adaptive reuse, restoration, mothballing, or retention under Alternative 4 Scenario 2. The County Board of Supervisors will consider each of the alternatives, along with information in the record including but not limited to the 2020 Feasibility Study, when making their final decision on Project approval.

The commenter has included the Los Angeles Conservancy in the transmission of their comments to the County. Please refer to responses to the Los Angeles Conservancy in Letter No. C3 for responses to comments provided by this organization.

Letter D4

Chris Nichols

nixols@yahoo.com

Email dated October 22, 2019

Response No. D4-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment is incomplete and does not specifically identify an issue with the EIR. However, it will be submitted to the Los Angeles County Board of Supervisors for consideration prior to their final decision on the Project. A more detailed comment from the same commenter is included in Letter D5, to which the County has responded in Response to Comment D5.

Letter D5

Chris Nichols

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Email dated October 22, 2019

Response No. D5-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

The commenter states that the Los Angeles County is considering demolition of 60 historic buildings on the South Campus. As stated on page 3.4-32 of Section 3.4, *Cultural Resources*, of the Draft EIR, construction of the Project would include the demolition of a total of 57 District contributors (not "60 historic buildings" as the comment states) and 46 non-contributors. This includes 66 structures within the Development Area (39 District contributors and 27 non-contributors) and 43 structures on the remaining parts of the Project Site (21 District contributors and 22 non-contributors). Please refer to Figure 3.4-1 on page 3.4-13 for a map of the Rancho Los Amigos Historic District Boundary and the locations of the District contributor and non-contributor structures.

The commenter further recommends that the Draft EIR consider more preservation alternatives on the 74-acre Project Site. As stated on page 4-8 of Chapter 4, *Alternatives*, of the Draft EIR, a total of six (6) alternatives to the Project were contemplated, two of which were considered but were not selected for further analysis. The remaining four alternatives, including the "no project" alternative and three other "build" alternatives, are comprehensively evaluated in the Draft EIR. Of the six alternatives, five alternatives (excluding the No Project Alternative) provides some form of preservation as part of the proposed alternative, whether in the form of mothballing or as adaptive reuse.

The proposed Project would retain four individually eligible historic buildings, structures, and features including LACO Nos. 1100 (Administration/Safety Police Building), 1238 (Casa Consuelo), 1301 (Water Tower), plus the Moreton Bay Fig Tree. In addition, the County considered a Full Preservation Alternative and a Rehabilitation Alternative, which are discussed in Chapter 4, *Alternatives*, of the Draft EIR. While these alternatives would have preserved more buildings on the Project Site as suggested by the commenter and would meet the spirit and intent of historic preservation, based on the Rancho Los Amigos Historic District Tier 1- 4 Feasibility Studies (2007-2009 Feasibility Studies) referenced therein, these alternatives were determined to be infeasible due to cost, susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures, and inability to meet the Project Objectives. Therefore, these alternatives were initially considered but rejected from further analysis.

Additionally, the Draft EIR evaluates three alternatives with varying levels of retention of the existing structures: Alternative 2, Partial Preservation Alternative (both scenarios), Alternative 3, Reduced Demolition Alternative, and Alternative 4, Adaptive Reuse/Reduced Project Alternative, including an additional scenario under Alternative 4 as revised in this Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for a full description and analysis). All include a scenario in which the some of the buildings within the District are partially retained and mothballed and/or adaptively reused.

Subsequent to the publication of the Draft EIR, the County recognized that more up-to-date information was necessary to determine whether the alternatives carried forward for analysis in the Draft EIR would be feasible today given considerations related to architectural and structural conditions, mothballing requirements, and cost. Therefore, the County commissioned a Focused Feasibility Study (2020 Feasibility Study) (Harlan et al., 2020) to address the current requirements and costs of rehabilitating and adaptively reusing historical resources for current County needs, as well as determining the costs for mothballing. The 2020 Feasibility Study is provided in Appendix L to this Final EIR. As documented in the 2020 Feasibility Study, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural, seismic, and architectural upgrades to bring the historic buildings into serviceable use as required for compliance with Building Codes, as well as seismic, ADA, and Title 24 requirements. Additionally, the majority of the buildings on the South Campus are not good candidates for reuse because of the lack of sufficient square footage and open floor plans.

Based upon information provided in the 2020 Feasibility Study, it was determined that a select group of additional historic structures are feasible for adaptive reuse and preservation. These structures were incorporated into Scenario 2 under Alternative 4 in the Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). A total of six of 61 District Contributors would be retained either through adaptive reuse, restoration, mothballing, or retention under Alternative 4 Scenario 2. The County Board of Supervisors will consider each of the alternatives, along with information in the record including but not limited to the 2020 Feasibility Study, when making their final decision on Project approval.

Finally, the commenter opines that the County staff that would be relocated to the proposed Project site would be “happier in restored historic structures with a rich history than in an anonymous new office park.” The comment does not raise significant environmental issues or address the adequacy of the EIR or CEQA process. Thus, no further response is required.

The commenter has included the Los Angeles Conservancy in the transmission of their comments to the County. Please refer to responses to the Los Angeles Conservancy in Letter No. C3 for responses to comments provided by this organization.

Letter D6

Denise and Steve Smith
denise@cosmicmicrotech.com
Email dated October 22, 2019

Response No. D6-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment recommends restoring and reusing the buildings at Rancho Los Amigos. The proposed Project would retain four individually eligible historic buildings, structures, and features including LACO Nos. 1100 (Administration/Safety Police Building), 1238 (Casa Consuelo), 1301 (Water Tower), plus the Moreton Bay Fig Tree. In addition, the County considered a Full Preservation Alternative and a Rehabilitation Alternative, which are discussed in Chapter 4, *Alternatives*, of the Draft EIR. While these alternatives would have preserved more buildings on the Project Site as suggested by the commenter and would meet the spirit and intent of historic preservation, based on the Rancho Los Amigos Historic District Tier 1- 4 Feasibility Studies (2007-2009 Feasibility Studies) referenced therein, these alternatives were determined to be infeasible due to cost, susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures, and inability to meet the Project Objectives. Therefore, these alternatives were initially considered but rejected from further analysis.

Additionally, the Draft EIR evaluates three alternatives with varying levels of retention of the existing structures: Alternative 2, Partial Preservation Alternative (both scenarios), Alternative 3, Reduced Demolition Alternative, and Alternative 4, Adaptive Reuse/Reduced Project Alternative, including an additional scenario under Alternative 4 as revised in this Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for a full description and analysis). All include a scenario in which the some of the buildings within the District are partially retained and mothballed and/or adaptively reused.

Subsequent to the publication of the Draft EIR, the County recognized that more up-to-date information was necessary to determine whether the alternatives carried forward for analysis in the Draft EIR would be feasible today given considerations related to architectural and structural conditions, mothballing requirements, and cost. Therefore, the County commissioned a Focused Feasibility Study (2020 Feasibility Study) (Harlan et al., 2020) to address the current requirements and costs of rehabilitating and adaptively reusing historical resources for current County needs, as well as determining the costs for mothballing. The 2020 Feasibility Study is provided in Appendix L to this Final EIR. As documented in the 2020 Feasibility Study, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural, seismic, and architectural upgrades to bring the historic buildings into serviceable use as required for compliance with Building Codes, as well as seismic, ADA, and Title 24 requirements.

Additionally, the majority of the buildings on the South Campus are not good candidates for reuse because of the lack of sufficient square footage and open floor plans.

Based upon information provided in the 2020 Feasibility Study, it was determined that a select group of additional historic structures are feasible for adaptive reuse and preservation. These structures were incorporated into Scenario 2 under Alternative 4 in the Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). A total of six of 61 District Contributors would be retained either through adaptive reuse, restoration, mothballing, or retention under Alternative 4 Scenario 2. The County Board of Supervisors will consider each of the alternatives, along with information in the record including but not limited to the 2020 Feasibility Study, when making their final decision on Project approval.

The commenter expresses concern over losing architectural history of the Project Site. As stated on pages 3.4-14 and 3.4-15 of Section 3.4, *Cultural Resources*, of the Draft EIR, the District remains eligible for listing in the National Register and the California Register at the local level of significance for its association with the early healthcare of the County's indigent population and later treatment of patients with chronic illnesses or mental disorders. The District was also found eligible for listing in the National Register as a distinguishable entity with multiple components, many of which lack individual distinction, but which together physically express the historic function and significance of the facility. The District also meets Los Angeles County Landmark Criterion 1 for its association with events that have made a significant contribution to the broad patterns of the history of the County and community in which it is located, and Los Angeles County Landmark Criterion 5 as a resource that has been formally determined eligible for listing in the National Register and is listed in the California Register. Therefore, the District as a whole was not listed based on its architectural features, but rather on the aforementioned criteria. Only five buildings and structures were identified as individually eligible under the National Register, California Register, and Los Angeles County Landmark Criteria due to their architectural merit: LACO No. 1100 (Administration Building); LACO No. 1238 (Casa Consuelo); LACO No. 1300 (Power Plant); LACO No. 1301 (Water Tower); and LACO No. 1302 (Shop, Laundry, and Ice Plant). Under the proposed Project, LACO Nos. 1100, 1238, and 1301 would be retained and mothballed. Under Alternatives 1 through 4, all of these buildings would be retained and either left as is (No Project Alternative), mothballed (Partial Preservation and Reduced Demolition Alternatives), or mothballed and adaptively reused (Adaptive Reuse/Reduced Project Alternative).

Because the proposed Project would result in a significant impact to the District, three mitigation measures are proposed to reduce the impact to the extent feasible and are intended to create a historical record of Rancho Los Amigos and provide public access to the historical material removed from the proposed Project Site. Mitigation Measures MM-CUL-1a, 1b, and 1c are described in Section 3.4, *Cultural Resources*, of the Draft EIR. Mitigation Measure MM-CUL-1a requires a Historic American Landscape Survey (HALS) Standard Format documentation of the District's contributing Site Plan, which has been identified as a District contributor. Mitigation Measure MM-CUL-1b requires implementation of an interpretive and commemorative program documenting the historical significance of Rancho Los Amigos and the Los Angeles County Poor Farm. The program will feature a variety of informational programming that may include an on-

site interpretation program, artifacts, documentary film, and/or commemorative plaques to educate the public on the importance of the site. Mitigation Measure MM-CUL-1c requires preparation of an inventory of the 57 District contributors that will be demolished and identification of their key character-defining physical features appropriate for salvage and interpretation. Salvageable material would then be collected and made available for use in restoration or rehabilitation projects on the Project Site, or in the interpretive program to be developed under Mitigation Measure MM-CUL-1b.

The commenter has included the Los Angeles Conservancy in the transmission of their comments to the County. Please refer to responses to the Los Angeles Conservancy in Letter No. C3 for responses to comments provided by this organization.

Letter D7

Dennis Hill Content Creation
Dennis Hill
photos@dennishill.com
Email dated October 22, 2019

Response No. D7-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment suggests implementing adaptive reuse as a way to preserve historic and cultural resources. The Draft EIR evaluates three alternatives with varying levels of retention of the existing structures: Alternative 2, Partial Preservation Alternative (both scenarios), Alternative 3, Reduced Demolition Alternative, and Alternative 4, Adaptive Reuse/Reduced Project Alternative, including an additional scenario under Alternative 4 as revised in this Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). All include a scenario in which the some of the buildings within the District are partially retained and mothballed and/or adaptively reused. Alternative 4 (both scenarios) include adaptive reuse.

This comment states that the Project Site and "this" building and its context be documented to HABS standards as part of mitigation prior to issuing demolition and/or building permits. As stated in a footnote on page 3.4-37 of Section 3.4, *Cultural Resources*, of the Draft EIR, recordation of 61 contributing buildings, structures, and features were previously completed in 2008 and recorded in a HABS report. As further described on pages 3.4-41 and 3.4-42 as part of Mitigation Measure MM-CUL-1a, the landscape and site plan, as contributors to the District, were not part of the HABS recordation. As part of Mitigation Measure MM-CUL-1a, provided below, the District's Site Plan would be recorded in a HABS report:

Mitigation Measure MM-CUL-1a (MM-CUL-1a): Recordation of the District's Site Plan. The buildings in the District were previously recorded in a HABS report; however, one contributing component of the District was not recorded at the time, the landscape and site plan. Prior to any demolition or ground disturbing activity, the County shall retain a Qualified Preservation Professional to prepare a Historic American Landscape Survey (HALS) Level I Standard Format documentation of the District's Site Plan and landscape setting, including hardscape and softscape elements and features from the historic period of significance, such as roadways, curbs, sidewalks, mature trees, fields, gardens, and green spaces. The HALS documentation of the District's Site Plan shall record the history of the contributing elements, as well as important events or other significant contributions to the patterns and trends of history with which the property is associated.

The HALS documentation of the District's Site Plan shall include measured and interpretive drawings, large-format black and white photographs, and written histories documenting the District's evolution over time. Field photographs and notes shall also be included. All

documentation components shall be completed in accordance with the Secretary of the Interior's Standards and Guidelines for Historic American Landscape Survey (HALS standards).

The Qualified Preservation Professional shall submit the HALS documentation to the National Park Service for transmittal to the Library of Congress, and archival copies shall be sent to Rancho Los Amigos, County of Los Angeles Natural History Museum, Rancho Los Amigos Archives at University of Southern California, and Downey History Center. The Qualified Preservation Professional shall submit proof of submittal to the County no less than 30 days prior to the start of demolition of District contributing buildings, structures, and features.

Letter D8

Marilyn Welch

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Email dated October 22, 2019

Response No. D8-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment expresses a desire for the proposed Project to retain the existing buildings within the District that would be demolished under the proposed Project. The proposed Project would retain four individually eligible historic buildings, structures, and features including LACO Nos. 1100 (Administration/Safety Police Building), 1238 (Casa Consuelo), 1301 (Water Tower), plus the Moreton Bay Fig Tree. In addition, the County considered a Full Preservation Alternative and a Rehabilitation Alternative, which are discussed in Chapter 4, *Alternatives*, of the Draft EIR. While these alternatives would have preserved more buildings on the Project Site as suggested by the commenter and would meet the spirit and intent of historic preservation, based on the Rancho Los Amigos Historic District Tier 1- 4 Feasibility Studies (2007-2009 Feasibility Studies) referenced therein, these alternatives were determined to be infeasible due to cost, susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures, and inability to meet the Project Objectives. Therefore, these alternatives were initially considered but rejected from further analysis.

Additionally, the Draft EIR evaluates three alternatives with varying levels of retention of the existing structures: Alternative 2, Partial Preservation Alternative (both scenarios), Alternative 3, Reduced Demolition Alternative, and Alternative 4, Adaptive Reuse/Reduced Project Alternative, including an additional scenario under Alternative 4 as revised in this Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). All include a scenario in which the some of the buildings within the District are partially retained and mothballed and/or adaptively reused. Subsequent to the publication of the Draft EIR, the County recognized that more up-to-date information was necessary to determine whether the alternatives carried forward for analysis in the Draft EIR would be feasible today given considerations related to architectural and structural conditions, mothballing requirements, and cost. Therefore, the County commissioned a Focused Feasibility Study (2020 Feasibility Study) (Harlan et al., 2020) to address the current requirements and costs of rehabilitating and adaptively reusing historical resources for current County needs, as well as determining the costs for mothballing. The 2020 Feasibility Study is provided in Appendix L to this Final EIR. As documented in the 2020 Feasibility Study, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural, seismic, and architectural upgrades to bring the historic buildings into serviceable use as required for compliance with Building Codes, as well as seismic, ADA, and Title 24 requirements.

Additionally, the majority of the buildings on the South Campus are not good candidates for reuse because of the lack of sufficient square footage and open floor plans.

Based upon information provided in the 2020 Feasibility Study, it was determined that a select group of additional historic structures are feasible for adaptive reuse and preservation. These structures were incorporated into Scenario 2 under Alternative 4 in the Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). A total of six of 61 District Contributors would be retained either through adaptive reuse, restoration, mothballing, or retention under Alternative 4 Scenario 2. The County Board of Supervisors will consider each of the alternatives, along with information in the record including but not limited to the 2020 Feasibility Study, when making their final decision on Project approval.

Letter D9

Valerie Ho

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Email dated October 22, 2019

Response No. D9-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment expresses a desire for the proposed Project to retain the existing buildings within the District that would be demolished under the proposed Project. The proposed Project would retain four individually eligible historic buildings, structures, and features including LACO Nos. 1100 (Administration/Safety Police Building), 1238 (Casa Consuelo), 1301 (Water Tower), plus the Moreton Bay Fig Tree. In addition, the County considered a Full Preservation Alternative and a Rehabilitation Alternative, which are discussed in Chapter 4, *Alternatives*, of the Draft EIR. While these alternatives would have preserved more buildings on the Project Site as suggested by the commenter and would meet the spirit and intent of historic preservation, based on the Rancho Los Amigos Historic District Tier 1- 4 Feasibility Studies (2007-2009 Feasibility Studies) referenced therein, these alternatives were determined to be infeasible due to cost, susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures, and inability to meet the Project Objectives. Therefore, these alternatives were initially considered but rejected from further analysis.

Additionally, the Draft EIR evaluates three alternatives with varying levels of retention of the existing structures: Alternative 2, Partial Preservation Alternative (both scenarios), Alternative 3, Reduced Demolition Alternative, and Alternative 4, Adaptive Reuse/Reduced Project Alternative, including an additional scenario under Alternative 4 as revised in this Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for a full description and analysis). All include a scenario in which some of the buildings within the District are partially retained and mothballed and/or adaptively reused. Subsequent to the publication of the Draft EIR, the County recognized that more up-to-date information was necessary to determine whether the alternatives carried forward for analysis in the Draft EIR would be feasible today given considerations related to architectural and structural conditions, mothballing requirements, and cost. Therefore, the County commissioned a Focused Feasibility Study (2020 Feasibility Study) (Harlan et al., 2020) to address the current requirements and costs of rehabilitating and adaptively reusing historical resources for current County needs, as well as determining the costs for mothballing. The 2020 Feasibility Study is provided in Appendix L to this Final EIR. As documented in the 2020 Feasibility Study, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural, seismic, and architectural upgrades to bring the historic buildings into serviceable use as required for compliance with Building Codes, as well as seismic, ADA, and

Title 24 requirements. Additionally, the majority of the buildings on the South Campus are not good candidates for reuse because of the lack of sufficient square footage and open floor plans.

Based upon information provided in the 2020 Feasibility Study, it was determined that a select group of additional historic structures are feasible for adaptive reuse and preservation. These structures were incorporated into Scenario 2 under Alternative 4 in the Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). A total of six of 61 District Contributors would be retained either through adaptive reuse, restoration, mothballing, or retention under Alternative 4 Scenario 2. The County Board of Supervisors will consider each of the alternatives, along with information in the record including but not limited to the 2020 Feasibility Study, when making their final decision on Project approval.

Letter D10

Erik Stokien

stokiene@gmail.com

Email dated October 23, 2019

Response No. D10-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment expresses a desire for the proposed Project to retain the existing buildings within the District that would be demolished under the proposed Project. The proposed Project would retain four individually eligible historic buildings, structures, and features including LACO Nos. 1100 (Administration/Safety Police Building), 1238 (Casa Consuelo), 1301 (Water Tower), plus the Moreton Bay Fig Tree. In addition, the County considered a Full Preservation Alternative and a Rehabilitation Alternative, which are discussed in Chapter 4, *Alternatives*, of the Draft EIR. While these alternatives would have preserved more buildings on the Project Site as suggested by the commenter and would meet the spirit and intent of historic preservation, based on the Rancho Los Amigos Historic District Tier 1- 4 Feasibility Studies (2007-2009 Feasibility Studies) referenced therein, these alternatives were determined to be infeasible due to cost, susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures, and inability to meet the Project Objectives. Therefore, these alternatives were initially considered but rejected from further analysis.

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Subsequent to the publication of the Draft EIR, the County recognized that more up-to-date information was necessary to determine whether the alternatives carried forward for analysis in the Draft EIR would be feasible today given considerations related to architectural and structural conditions, mothballing requirements, and cost. Therefore, the County commissioned a Focused Feasibility Study (2020 Feasibility Study) (Harlan et al., 2020) to address the current requirements and costs of rehabilitating and adaptively reusing historical resources for current County needs, as well as determining the costs for mothballing. The 2020 Feasibility Study is provided in Appendix L to this Final EIR. As documented in the 2020 Feasibility Study, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural, seismic, and architectural upgrades to bring the historic buildings into serviceable use as required

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Letter D11

Jacklyn Loughbom
dianeandbob@roadrunner.com
Email dated October 23, 2019

Response No. D11-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment expresses a desire for the proposed Project to retain the existing buildings within the District that would be demolished under the proposed Project. The proposed Project would retain four individually eligible historic buildings, structures, and features including LACO Nos. 1100 (Administration/Safety Police Building), 1238 (Casa Consuelo), 1301 (Water Tower), plus the Moreton Bay Fig Tree. In addition, the County considered a Full Preservation Alternative and a Rehabilitation Alternative, which are discussed in Chapter 4, *Alternatives*, of the Draft EIR. While these alternatives would have preserved more buildings on the Project Site as suggested by the commenter and would meet the spirit and intent of historic preservation, based on the Rancho Los Amigos Historic District Tier 1- 4 Feasibility Studies (2007-2009 Feasibility Studies) referenced therein, these alternatives were determined to be infeasible due to cost, susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures, and inability to meet the Project Objectives. Therefore, these alternatives were initially considered but rejected from further analysis.

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Letter D12

Leora Glass

leoraglass@me.com

Email dated October 24, 2019

Response No. D12-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

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Based upon information provided in the 2020 Feasibility Study, it was determined that a select group of additional historic structures are feasible for adaptive reuse and preservation. These structures were incorporated into Scenario 2 under Alternative 4 in the Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). A total of six of 61 District Contributors would be retained either through adaptive reuse, restoration, mothballing, or retention under Alternative 4 Scenario 2. The County Board of Supervisors will consider each of the alternatives, along with information in the record including but not limited to the 2020 Feasibility Study, when making their final decision on Project approval.

Letter D13

Heather Sabin
hsabin40@hotmail.com
3844 York Boulevard
Los Angeles, CA 90065
Email dated October 25, 2019

Response No. D13-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment expresses a desire for the proposed Project to retain the existing buildings within the District that would be demolished under the proposed Project. The proposed Project would retain four individually eligible historic buildings, structures, and features including LACO Nos. 1100 (Administration/Safety Police Building), 1238 (Casa Consuelo), 1301 (Water Tower), plus the Moreton Bay Fig Tree. In addition, the County considered a Full Preservation Alternative and a Rehabilitation Alternative, which are discussed in Chapter 4, *Alternatives*, of the Draft EIR. While these alternatives would have preserved more buildings on the Project Site as suggested by the commenter and would meet the spirit and intent of historic preservation, based on the Rancho Los Amigos Historic District Tier 1- 4 Feasibility Studies (2007-2009 Feasibility Studies) referenced therein, these alternatives were determined to be infeasible due to cost, susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures, and inability to meet the Project Objectives. Therefore, these alternatives were initially considered but rejected from further analysis.

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The comment also expresses preference for using the Project Site in line with its original purpose as the Poor Farm to address the lack of housing for the homeless population in Los Angeles County, but does not raise significant environmental issues or address the adequacy of the EIR or CEQA process. Thus, no further response is required.

Letter D14

Alicia Flores-Rivera
10325 Garfield Avenue
South Gate, CA 90280

Written comment received on October 28, 2019

Response No. D14-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

The comment states that the County should take into consideration assisting with street improvements to help with the impact of additional traffic on Gardendale Street, Paramount Boulevard, Garfield Avenue, and Imperial Highway, as well as states whether or not Gardendale will be returned to four streets by removing the bike lanes.

The analysis of potential transportation and traffic impacts related to the Project is provided in Section 3.11, *Transportation*, and Appendix H, Traffic Impact Study, of the Draft EIR.

Figure 3.11-1 in the Draft EIR indicates the location of the study intersections evaluated for potential traffic impacts due to the Project. As shown on Figure 3.11-1, study intersections were evaluated on the roadways cited in the comment: Gardendale Street, Paramount Boulevard, Garfield Avenue and Imperial Highway. Tables 3.11-6 and 3.11-8 in the Draft EIR summarize the traffic analysis prepared for the Existing with Project and Future with Project conditions, respectively. Table 3.11-9 of the Draft EIR provides a summary of the intersections calculated to be significantly impacted by traffic due to the Project. Table 3.11-9 of the Draft EIR lists the six intersections along Gardendale Street, Imperial Highway, and Paramount Boulevard forecast to be significantly impacted by traffic due to the Project (no intersections along Garfield Avenue are forecast to be significantly impacted by the Project).

Potential mitigation measures to alleviate the significant traffic impacts at all of the affected intersections are described on page 3.11-27. As described on page 3.11-29 in the Draft EIR, these intersections are outside the jurisdiction of the Lead Agency (the County) as they are located in the cities of Downey, South Gate, and/or Paramount. Therefore, for each mitigation measure identified in the Draft EIR, its implementation cannot be guaranteed. Therefore, each of the impacts at the affected intersections along Gardendale Street are considered in the Draft EIR to be significant and unavoidable. The suggestion in the comment for the County to assist with street improvements will be forwarded to the decision-maker for review and consideration.

Refer to Response to Comment No. D1-2 for a discussion regarding the suggestion to return the configuration of Gardendale Street to provide two through travel lanes in each direction. It is beyond the jurisdiction of the County to reverse the Gardendale Street project and revert the roadway striping to its prior pre-2017 condition. However, the suggestion to return Gardendale

Street to providing two travel lanes in each direction will be forwarded to the decision-maker for review and consideration.

Letter D15

Andrea Paulino
11625 Utah Avenue
Hollydale, CA 90280

Written comment received on October 28, 2019

Response No. D15-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment states that the commenter's city (Hollydale) should not have to pay for problems that the County creates. The commenter also requests another meeting where they can ask questions and get answers. It is unclear what "problems" the commenter believes the County should pay for in this comment. To the extent the comment refers to payment for road improvements, please refer to Response to Comment No. D15-3, below.

In regard to the meeting request, as noted in the Notice of Availability, the purpose of the public meeting on the Draft EIR, held on October 28, 2019, was to discuss the EIR and to solicit comments on the Draft EIR's analysis. During the meeting, the public was permitted to provide input and comments verbally to the County and the environmental consultants. The purpose of the Final EIR, also, is to respond to comments received on the Draft EIR's analysis. These responses are provided within this Chapter 2, *Comments and Responses*, of the Final EIR.

Response No. D15-2

This comment requests that Gardendale Street be returned to four lanes. The project referenced in the comment that reduced Gardendale Street from the original four lanes to the current two lane configuration was completed in 2015 (Los Angeles Wave Newspapers, 2015) and was a joint effort of the cities of Downey, South Gate and Paramount. Following implementation of the cities' project, Gardendale Street now provides one through vehicle travel lane in each direction, a center two-way left-turn lane, and one bike lane in each direction. The County understands that implementation of the Gardendale Street project involved extensive review and discussion among the affected cities. It is beyond the jurisdiction of the County to reverse the Gardendale Street project and revert the roadway striping to its prior pre-2017 condition. However, the suggestion to return Gardendale Street to providing two travel lanes in each direction will be forwarded to the decision-maker for review and consideration.

Response No. D15-3

This comment states that the County should pay for the necessary road improvements and to ease the significant impacts on the neighborhoods. As stated on page 3.11-28 of Section 3.11, *Transportation*, of the Draft EIR, Mitigation Measure TRA-2 states that Los Angeles County

shall provide a fair-share contribution towards restriping the eastbound Imperial Highway approach to the Wright Road intersection to provide one additional through lane, resulting in one left-turn lane, two through lanes, and one optional through/right-turn lane. The revised lane configurations can be implemented without modifying the existing curb-to-curb roadway width on Imperial Highway. Such payment shall be due after approval of this improvement by both the City of South Gate and the City of Lynwood. As shown in Table 3.11-9, this mitigation measure would mitigate the AM peak hour intersection impact to a less-than-significant level. However, since the intersection is under the joint jurisdiction of the City of South Gate and the City of Lynwood, and the improvement involves a policy decision by these agencies, the County cannot guarantee that those jurisdictions will agree with implementation of this mitigation measure.

Similarly, for Mitigation Measure TRA-3 on page 3.11-29, the mitigation measure states that Los Angeles County shall provide a fair-share contribution towards the installation of a traffic signal. Based on the signal warrant analysis conducted for the proposed Project (refer to Appendix H), there is sufficient side street volume to warrant the installation of a traffic signal at this intersection. Such payment shall be due after approval of such signalization by both the City of Downey and the City of South Gate. As shown in Table 3.11-9, this mitigation measure would mitigate the AM and PM peak hour intersection impact to a less-than-significant level. However, since the intersection is under the joint jurisdiction of the City of Downey and the City of South Gate, and the improvement involves a policy decision by these agencies, the County cannot guarantee that those jurisdictions will agree with implementation of this mitigation measure.

While the impacts are conservatively determined to be significant and unavoidable, the County proposes mitigation measures to provide fair-share contributions to alleviate the particular impacted intersections. However, because those intersections are under joint jurisdiction of other Cities, the County cannot guarantee that the jurisdictions will agree and allow for implementation of the mitigation measures.

Response No. D15-4

This comment states that the traffic created by the Project would lead to poor air quality. As stated on page 3.2-28 of Section 3.2, *Air Quality*, of the Draft EIR, mobile source emissions are estimated based on the predicted number of trips to and from the Project Site determined by the Traffic Impact Study prepared by LLG, provided in Appendix H of the Draft EIR; trip lengths from CalEEMod default data; and emission factors from EMFAC2014. The Traffic Impact Study accounts for trip generation for Project buildout of 3,000 employees.

As stated on page 3.2-34, the majority of operational (unmitigated) NO_x emissions are attributable to mobile emissions from employee trips. Implementation of Mitigation Measure MM-AIR-5 for a Transportation Design Management Program would reduce the amount of Project employee trips; however, because it is speculative to assume the extent of participation in the TDM program by employees, no reductions in emissions has been assumed (as shown in Table 3.2-6 and 3.2-7). There are no additional feasible mitigation measures that would reduce the NO_x emissions from operations to below the SCAQMD regional significance threshold, and impacts related to regional NO_x operational emissions would therefore be significant and

unavoidable with mitigation. However, Project operational emissions would be regional in nature as they would occur over a relatively large area from multiple individual developments associated within the Project Site. In addition, ground-level ozone formation occurs through a complex photo-chemical reaction between NO_x and VOCs in the atmosphere with the presence of sunlight, the impacts of ozone are typically considered on a basin-wide or regional basis.

According to CARB, anthropogenic sources of emissions in the Basin emit a total of approximately 514 tons of NO_x per day. Table 3.2-7 indicates that maximum mitigated operational emissions from the Project could be up to 0.030 tons (59 pounds) of NO_x per day. This represents approximately 0.006 percent of the Basin's NO_x emissions. As noted above, this assumes that all Project emissions are considered net new emissions, which is a highly conservative assumption that likely overestimates the Project's actual incremental increase in regional emissions. Given that the Project's emissions would constitute a very small portion of the Basin's emissions and would occur over a relatively large area (primarily due to motor vehicles traveling on regional roadways) and given that meteorological effects, such as wind, would disperse the pollutants, it is unlikely that the exceedance of the NO_x regional threshold from operations would result in a measurable increase in the ambient pollutant concentrations of ozone in the Basin to a degree that measureable health impacts would result. It is not practical or meaningful to attempt determine regional ozone concentration or health impacts from a Project's relatively small ozone precursor emissions. The accumulation and dispersion of air pollutant emissions within an air basin is dependent upon the size and distribution of emission sources in the region and meteorological factors such as wind, sunlight, temperature, humidity, rainfall, atmospheric pressure, and topography.

As expressed in the amicus curiae brief submitted for the *Sierra Club v. County of Fresno* case (Friant Ranch Case), the air districts established and recommend CEQA air quality analysis of criteria air pollutants use significance thresholds that were set at emission levels tied to the region's attainment status, based on emission levels at which stationary pollution sources permitted by the air district must offset their emissions. Such offset levels allow for growth while keeping the cumulative effects of new sources at a level that will not impede attainment of the NAAQS. The health risks associated with exposure to criteria pollutants are evaluated on a regional level, based on the region's attainment of the NAAQS. The mass emissions significance thresholds used in CEQA air quality analysis are not intended to be indicative of human health impacts that a project may have. Therefore, the Project's exceedance of the mass regional emissions threshold (i.e., Project operational NO_x exceedance) from Project-related activities does not necessarily indicate that the Project would cause or contribute to the exposure of sensitive receptors to ground-level concentrations in excess of health-protective levels.

Letter D16

Briseida Ramirez
7908 Puritan Street
Downey, CA 90242

Written comment received on October 28, 2019

Response No. D16-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment states that the commenter is concerned with construction affecting the structures of their home. Based on the commenter's address provided on the comment card, the commenter resides adjacent to Consuelo Street. As shown throughout Chapter 2, *Project Description*, of the Draft EIR, the development of the new structures would not be located close to Consuelo Street, particularly where the commenter resides. Additionally, as shown in Figure 2-7, there would be no roadway improvements located by the commenter. Nevertheless, Section 3.10, *Noise*, analyzes the potential for groundborne vibration to impact nearby structures. As stated on page 3.10-35, construction activities on the Project Site have the potential to generate low levels of groundborne vibration from the operation of heavy equipment (i.e., dozer, excavator, grader, loader, scraper, and paver, etc.) that propagate through the ground and diminish in intensity with distance from the source. No high-impact activities, such as pile driving or blasting, would be used during Project construction. Single-family residential uses to the east of the existing northeastern surface parking lot by Dahlia Street are the nearest off-site buildings to the Project Site (approximately 15 feet) that could be exposed to vibration levels generated from Project construction. Groundborne vibrations from construction activities very rarely reach the levels that can damage structures, but they may be perceived in buildings very close to a construction site.

Maximum vibration velocities at a distance of 15 feet would exceed the threshold for human annoyance of 0.04 in/sec PPV at single-family residences located to the east of the existing northeastern surface parking lot, which would be demolished as part of the Project. All other sensitive uses are located at distances of 50 feet or more from Project construction activities; therefore, potential impacts are limited to occupants of up to six residences adjacent to the existing northeastern surface parking lot. Implementation of Mitigation Measures NOI-8 and NOI-9 would require that high impact equipment generating high levels of vibration velocity be limited to the extent feasible at distances closer than 25 feet from residential uses. However, limiting the type of equipment that can be used at distances of 25 feet or less could prolong the construction schedule, increasing the number of days that sensitive uses are exposed to construction noise and vibration. Additionally, demolition of the surface parking lot would require the breaking of asphalt surfaces that may not be feasible without the appropriate equipment. Therefore, vibration impacts related to human annoyance cannot be feasibly mitigated to less than significant, and impacts would be significant and unavoidable for the occupants of up

to six residences. However, as specified above, these impacts would only be relevant for the occupants of up to six residences adjacent to the northeastern surface parking lot. Therefore, the commenter's residence would not be affected.

Response No. D16-2

The commenter is inquiring if the empty space on Consuelo Street could be sold or granted to the homeowners on adjacent properties to offset what the commenter identifies as the trouble of taking in increased traffic, noise, and air pollution. The Draft EIR analyzes traffic, noise, and air pollution in Sections 3.11, *Transportation*, 3.10, *Noise*, and 3.2, *Air Quality*, respectively. The County is not considering selling its property as part of this Project. As this comment does not raise significant environmental issues or deficiencies in the Draft EIR, no further response is required.

Response No. D16-3

This commenter states that the City of Downey residents should be able to use the sports complex. It should be noted that the sports complex is not part of the proposed Project. As stated on pages 2-45 and 2-46 of Chapter 2, *Project Description*, of the Draft EIR, the sports center will be constructed by the County and leased to the City of Downey who will operate and maintain it. Questions regarding the operational characteristics of this separate project should be directed to the City of Downey who will maintain the facility once constructed.

Letter D17

Cecilia Tellez
7826 Puritan Street
Downey, CA 90242

Written comment received on October 28, 2019

Response No. D17-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment expresses concern regarding traffic, pollution, and noise that may be experienced along Consuelo Street. With regard to traffic, Consuelo Street has not been identified as a point of ingress/egress to the Project Site. The Project Description indicates that Consuelo Street would be widened and repaved as part of proposed roadway improvements that were analyzed as part of the proposed Project. This is illustrated in Figure 2-7, Proposed Roadway Improvements, in Chapter 2, *Project Description*, of the Draft EIR, which shows the areas of Consuelo Street to be widened and repaved are within the inner most portions of the Project Site. As discussed in Section 3.11, *Transportation*, of the Draft EIR, emergency access would be provided from Consuelo Street. As noted on pages 3.11-13 through 3.11-14 of Section 3.11, *Transportation*, of the Draft EIR, approximately half of the Project trips (55 percent) would leave the Project Site using Gardendale Street, with the other half (45 percent) leaving the site using Imperial Highway. No trips were assumed to enter or exit the site using Consuelo Street. Furthermore, as the portion of Consuelo Street that extends to Paramount Boulevard, directly parallel to the residential neighborhood to the north, would only be used for emergency access and would remain gated as it is under the existing condition, development of the Project is not anticipated to generate a high level of traffic along this portion of Consuelo Street. Additionally, a Supplemental Traffic Analysis (refer to Appendix H-3 to the Final EIR) alternatively considered that 15 percent of trips leaving the Project Site would use Consuelo Street and concluded that even with this change in trip distribution, the potential traffic impacts due to the Project would be less than significant. This was the same conclusion for the proposed Project. As such, the limited number of vehicle trips along Consuelo Street would not generate pollution or traffic noise levels that would exceed air quality or noise thresholds along this portion of the street closest to the residential neighborhood.

Response No. D17-2

The comment, which is handwritten, appears to state, "I concern on the whole impact maybe seeing or unseeing." It is not clear what is meant by this comment and, therefore, no additional response is possible.

Response No. D17-3

The commenter questions what will happen to the empty lot behind her house. It appears that the commenter is referring to the easement of land along Consuelo Street. This area would not be changed as part of the Project. There would be no improvements to Consuelo Street near the residential area. Only Consuelo Street west of Dahlia Street will be repaved and widened.

Letter D18

David A. Smith

10237 Karmont Avenue

South Gate, CA 90280

Written comment received on October 28, 2019

Response No. D18-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment states that while the new buildings proposed under the Project would improve the aesthetics of the area, the Project would also result in an increase in traffic along Gardendale Street and other side streets. The comment also requests that the vehicles be moved from side streets to major streets, such as Paramount Boulevard and Imperial Highway.

The analysis of potential transportation and traffic impacts related to the Project is provided in Section 3.11, *Transportation*, and Appendix H, *Traffic Impact Study*, of the Draft EIR. Vehicular access for the Project is generally described in Section 2.4.6, *Parking, Access, and Circulation*, of Chapter 2, *Project Description*, as well as on pages 3.11-1 and 3.11-13 to -14 in Section 3.11, *Transportation*, of the Draft EIR. Additional details regarding the assumed distribution patterns are provided on Figure 7-1 of the Traffic Impact Study. As shown on Figure 7-1, approximately 10 percent of Project trips are assumed to access Imperial Highway at Old River School Road, approximately 25 percent of Project trips are assumed to access Imperial Highway at Erickson Avenue, and approximately 55 percent of Project trips are assumed to access Gardendale Street via the future restored connection at Erickson Avenue. No Project trips are assumed to use Consuelo Street for access via Paramount Boulevard, in part due to the nature of the existing Paramount Boulevard/Consuelo Street intersection, which is stop sign controlled and provides limited turning movements due to the existing raised median on Paramount Boulevard which limits traffic movements to right-turns from southbound Paramount Boulevard to westbound Consuelo Street and right-turns from eastbound Consuelo Street to southbound Paramount Boulevard.

Nevertheless, while the County does not believe the trip distribution proposed in the comment is reasonably foreseeable, the Final EIR includes a Supplemental Traffic Analysis that alternatively considers that 15 percent of trips leaving the Project Site would use Consuelo Street (refer to Appendix H-3 to this Final EIR). As noted in the comment and as shown in **Final EIR Figure 2-1**, a stop sign is provided on the eastbound Consuelo Street approach to its intersection with Paramount Boulevard. Due to a median on Paramount Boulevard in this location, only right-turn lanes from Consuelo Street to Paramount Boulevard southbound are allowed. This median also prohibits left turns into the Project Site from northbound Paramount Boulevard; the only allowed

movement would be a right turn into the Project Site from Paramount Boulevard traveling southbound.

As a result of this alternative trip assignment, the Supplemental Traffic Analysis evaluates potential traffic impacts at the Paramount Boulevard / Puritan Street and Paramount Boulevard / Consuelo Street-Cheyenne Street intersection. In addition, the Supplemental Analysis re-reviews the Paramount Boulevard / Gardendale Street intersection under this alternative assignment. Figure 1 of the Supplemental Analysis shows the alternative trip distribution and assignment under this scenario.

As shown in the Supplemental Traffic Analysis, the Project's potential traffic impacts would be less than significant based on the City of South Gate traffic analysis procedures and thresholds of significance at the Paramount Boulevard / Puritan Street and Paramount Boulevard / Consuelo Street-Cheyenne Street intersection, which is the same conclusion for the proposed Project.

Figure 3.11-1 in the Draft EIR indicates the location of the study intersections evaluated for potential traffic impacts due to the Project. Table 3.11-9 of the Draft EIR provides a summary of the intersections calculated to be significantly impacted by traffic due to the Project. Potential mitigation measures to alleviate the significant traffic impacts at all of the affected intersections are described in the Draft EIR beginning on page 3.11-27. As described in the Draft EIR (e.g., page 3.11-29), these intersections are outside the jurisdiction of the Lead Agency (the County of Los Angeles) as they are located in the cities of Downey, South Gate, and/or Paramount. For each mitigation measure identified in the Draft EIR, its implementation cannot be guaranteed. Therefore, each of the impacts at the affected intersections are considered in the Draft EIR to be significant and unavoidable.

The County does not control Consuelo Street and thus, the commenter's suggestion to modify Consuelo Street to provide four travel lanes is beyond the scope of analysis of this Draft EIR. Further, the installation of a traffic signal at the Paramount Boulevard/Consuelo Street intersection is also beyond the scope of analysis of this Draft EIR. However, the suggestions in the comment will be forwarded to the decision-maker for review and consideration.

Letter D19

Jean O. Douglass
12878 Dahlia Street
Downey, CA 90242

Written comment received on October 28, 2019

Response No. D19-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project

This comment inquires about the status of LACO No. 3592. The commenter notes that the building invites vandalism and destruction, along with overgrown weeds. As noted on page 2-52 of Table 2-1 in Chapter 2, *Project Description*, of the Draft EIR, LACO No. 3592 is a non-contributor to the Historic District and is not individually eligible for listing as an historic resource. As proposed under the Project and as described on page 2-32, non-contributors would be demolished. Therefore, LACO No. 3592 would be demolished under the Project.

Letter D20

Linda Parsonson
5780 Main Street
South Gate, CA 90280

Written comment received on October 28, 2019

Response No. D20-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment expresses concern regarding the location of a historic cemetery. As discussed in Section 3.4, Cultural Resources, of the Draft EIR, no dedicated cemeteries or human remains were identified within the Project Site as a result of the archival research or pedestrian survey. The archival research revealed that the Los Angeles County Poor Farm Cemetery was located approximately 0.30 miles from the Development Area, and construction of the proposed Project does not have the potential to encounter remains related to the cemetery. The location of the cemetery is adequately addressed in the Draft EIR. Nevertheless, the Draft EIR discusses procedural requirements to be enacted in the event of an inadvertent discovery of human resources; refer to Mitigation Measures MM-CUL-2f and MM-CUL-4, which address the confidentiality of discoveries and safety precautions associated with discovery of cultural resources. Additionally, Mitigation Measure MM-CUL-2c requires a Cultural Resources Mitigation and Monitoring Program (CRMMP) outlining the protocols and procedures in compliance with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 to be followed in the event that human remains and associated funerary objects are encountered during construction.

Response No. D20-2

The comment expresses a desire for the proposed Project to retain the Shop, Laundry, and Ice Plant (LACO No. 1302). The analysis of Alternative 2, Partial Preservation Alternative (both scenarios), Alternative 3, Reduced Demolition Alternative, and Alternative 4, Adaptive Reuse/Reduced Project Alternative, including an additional scenario under Alternative 4 as revised in this Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis), all provide a scenario in which the Shop, Laundry, and Ice Plant (LACO No. 1302) is retained. The County Board of Supervisors will consider each of the alternatives when making their final decision on Project approval and the feasibility of the Project and all alternatives.

Letter D21

Linda Parsonson
5780 Main Street
South Gate, CA 90280

Written comment received on October 28, 2019

Response No. D21-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

The comment states that trains cause traffic backups on Garfield Avenue and Gardendale Street and inquires if the increase in trains on traffic are considered in the analysis. The analysis of potential transportation and traffic impacts related to the Project is provided in Section 3.11, *Transportation*, of the Draft EIR.

Figure 3.11-1 in the Draft EIR indicates the location of the study intersections evaluated for potential traffic impacts due to the Project. The Draft EIR evaluates the Project's impacts at the study intersections due to the potential that vehicular traffic generated by the Project would adversely affect operations at these locations. The comment cites two existing at-grade single track rail crossings in the study area: one on Gardendale Street located west of Intersection No. 15 (Industrial Avenue / Gardendale Street) and a second on Garfield Avenue located south of Intersection No. 5 (Garfield Avenue / Imperial Highway). Train crossings at these locations are highly infrequent during the analyzed AM and PM peak hours and likely do not affect operations at the study intersections. Further, the Project itself will not result in an increase in train crossings. Therefore, no further review or analysis is required related to the existing at-grade train crossings.

Letter D22

Renee Acero

5775 Roosevelt Avenue

South Gate, CA 90280

Written comment received on October 28, 2019

Response No. D22-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment requests that Gardendale Street be reverted to four lanes. This comment also requests to restrict entrance and exits to one-way turns only. The comment then requests a signal at Gardendale Street and Paramount Boulevard.

The analysis of potential transportation and traffic impacts related to the Project is provided in Section 3.11, Transportation, of the Draft EIR. Figure 3.11-1 in the Draft EIR indicates the location of the study intersections evaluated for potential traffic impacts due to the Project. Table 3.11-9 of the Draft EIR provides a summary of the intersections calculated to be significantly impacted by traffic due to the Project. Potential mitigation measures to alleviate the significant traffic impacts at all of the affected intersections are described in the Draft EIR beginning on page 3.11-27. As described in the Draft EIR (e.g., page 3.11-29), these intersections are outside the jurisdiction of the Lead Agency (the County of Los Angeles) as they are located in the cities of Downey, South Gate, and/or Paramount. For each mitigation measure identified in the Draft EIR, its implementation cannot be guaranteed. Therefore, each of the impacts at the affected intersections are considered in the Draft EIR to be significant and unavoidable.

Refer to Response to Comment No. D1-2 for a discussion regarding the suggestion to return the configuration of Gardendale Street to provide two through travel lanes in each direction. It is beyond the jurisdiction of the County of Los Angeles to reverse the Gardendale Street project and revert the roadway striping to its prior pre-2017 condition. However, the suggestion to return Gardendale Street to providing two travel lanes in each direction will be forwarded to the decision-maker for review and consideration.

Figure 7-1 in the Traffic Impact Study, contained in Appendix H of the Draft EIR, provides the assumed assignment of Project-related vehicle trips at the study intersections. It is shown on Figure 7-1 that at Intersection No. 16 (Erickson Avenue / Gardendale Street), full left-turn and right-turn access is assumed to accommodate Project-related vehicle trips. A discussion of the Project's significant traffic impact at this intersection and potential mitigation is provided in the Draft EIR on pages 3.11-28 and 3.11-29. As disclosed in the Draft EIR, the impact would remain significant and unavoidable because the County cannot guarantee implementation of the recommend mitigation measure. The suggestion in the comment to "restrict entrance & exits to

one way turns only” is not clear, but will be forwarded to the decision-maker for review and consideration.

A discussion of the Project’s significant traffic impact at Intersection No. 20 (Paramount Boulevard / Gardendale Street) is provided in the Draft EIR on page 3.11-29. As disclosed in the Draft EIR, there are no reasonable or feasible mitigation measures available at this intersection. Therefore, the impact of the Project would remain significant and unavoidable. There currently is no separate left-turn phasing (i.e., left-turn arrows) on the Paramount Boulevard and Gardendale Street approaches at this intersection. The installation of left-turn phasing at the intersection as suggested in the comment is beyond the scope of the analysis provided in the Draft EIR because it is outside the jurisdiction of the County to implement. Further, while left-turn phasing may better facilitate left-turn operations at the intersection, it does not add “capacity” to the overall intersection because left-turn phasing reduces the amount of “green” time available to through traffic movements. However, the suggestion in the comment to install left-turn phasing at the intersection will be forwarded to the decision-maker for review and consideration.

Response No. D22-2

This comment suggests that the style of the existing buildings be kept and that the building heights be restricted to five stories. In regard to the style of the buildings, as discussed on pages 3.1-22 through 3.1-24 of Section 3.1, *Aesthetics*, of the Draft EIR, the new buildings would replace the dilapidated buildings and provide new views and massing for the surrounding uses. The proposed Project would retain LACO No. 1100 (Administration/Safety Police Building), LACO No. 1238 (Casa Consuelo), and LACO No. 1301 (Water Tower), as well as the Moreton Bay Fig Tree, all of which are individually eligible historic buildings and landscape features. The existing buildings to be retained would continue to be excellent samples of the architectural style, design, workmanship, and integrity of location of the historic setting. These features, which contribute to the overall historic character of the Project Site, would remain. The new buildings would serve as the core of the Project Site and would be connected by the new landscaping features and zones between the buildings. As discussed on pages 3.4-29, 3.4-30, 3.4-40, and 3.4-41 of the Draft EIR, given to proximity to new construction in relation to LACO No. 1238 (Casa Consuelo), new construction would conform to Standards 9 and 10 of the Secretary of Interior Standards, meaning that new construction would be required to be compatible with the massing, size, scale, and architectural features of the adjacent historic resources, yet be differentiated from the old ensuring that the historic resource remains the focal point. Furthermore, the Draft EIR identifies Mitigation Measures MM-CUL-1b and CUL-1c to ensure that significant architectural characteristics would be captured in the Project as informational programming or potentially as restoration or rehabilitation projects on the Project Site. Implementation of an Interpretive and Commemorative Program (Mitigation Measure MM-CUL-1b) would capture the visual characteristics and significance of the Project Site. Therefore, although the visual character of the Project Site would change as a result of the proposed Project, with implementation of Mitigation Measures MM-CUL-1b and CUL-1c, it would not substantially degrade the existing visual character or quality of the site and its surroundings as the visual character would be preserved through the new buildings and/or interpretive program on the Project Site. As such, operational impacts to existing visual character or quality would be less than significant with mitigation.

Response No. D22-3

This comment requests more patrols by the Downey Police Department and the Los Angeles County Sheriff's Department, but does not raise significant environmental issues or address the adequacy of the EIR or CEQA process. Thus, no further response is required.

Response No. D22-4

This comment requests that the County reconsider demolition of a majority of buildings that could be considered historic landmarks. Refer to Response to Comment No. D22-2 above, which discusses the individually eligible historic buildings and landscape features that would be retained under the Project. In addition, the County considered a Full Preservation Alternative and a Rehabilitation Alternative, which are discussed in Chapter 4, *Alternatives*, of the Draft EIR. While these alternatives would have preserved more buildings on the Project Site as suggested by the commenter and would meet the spirit and intent of historic preservation, based on the Rancho Los Amigos Historic District Tier 1- 4 Feasibility Studies (2007-2009 Feasibility Studies) referenced therein, these alternatives were determined to be infeasible due to cost, susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures, and inability to meet the Project Objectives. Therefore, these alternatives were initially considered but rejected from further analysis.

Additionally, the Draft EIR evaluates three alternatives with varying levels of retention of the existing structures: Alternative 2, Partial Preservation Alternative (two scenarios), Alternative 3, Reduced Demolition Alternative, and Alternative 4, Adaptive Reuse/Reduced Project Alternative, including an additional scenario under Alternative 4 as revised in this Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). All include a scenario in which the some of the buildings within the District are partially retained and mothballed and/or adaptively reused.

Response No. D22-5

This comment states that the analysis did not consider a housing development at the American Legion site on Garfield Avenue and Gardendale Street. The comment is in reference to a proposed affordable housing project at 11269 Garfield Avenue in the City of Downey. The County understands that the referenced project would provide approximately 60-80 residential units for persons previously homeless. The list of cumulative projects considered in the Draft EIR (Table 2-8 of the Draft EIR), and the list of cumulative projects considered in the traffic analysis (Table 6-1 of the Traffic Impact Study) were specifically determined as a result of focused inquiries with surrounding jurisdictions (including the City of Downey). This development was not on the list of potential development projects provided by the City of Downey at the time of preparation of the Draft EIR. Therefore, it was not on list of cumulative projects in Table 2-8 of Chapter 2, *Project Description*, of the Draft EIR. However, such a project would likely generate limited vehicle trips because of the nature of the proposed tenants, which would be comprised of residents who typically rely on mass transit and other forms of transit beyond vehicle trips and therefore generate fewer trips than traditional single-family residential

developments. In addition, the Project's Traffic Impact Study, contained in Appendix H of the Draft EIR, describes the inclusion of an ambient growth traffic factor for purposes of forecasting future traffic, in addition to the review and forecast of traffic due to the cumulative projects. As described on page 32 of the Traffic Impact Study, the inclusion of the ambient traffic factor is intended to account for potential future traffic growth related to development projects not identified in the list of cumulative projects. As the consideration of both traffic from the identified cumulative projects in the Draft EIR, as well as the ambient traffic growth factor is highly conservative, additional analysis related to the affordable housing project identified in the comment is not required.

Letter D23

Virginia Johnson
5751 McKinley Avenue
South Gate, CA 90280

Written comment received on October 28, 2019

Response No. D23-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment requests that Consuelo Street become a four-lane street providing project ingress and egress to Paramount Boulevard. Consuelo Street has not been identified as a point of access to the Project Site. As described in Response to Comment No. B5-46, access to and from the Project Site would be provided from Erickson Avenue to either Gardendale Street or Imperial Highway.

The Traffic Impact Study assumed that traffic entering and exiting the Project Site would more likely use Erickson Avenue. Trips that would use Paramount Boulevard / Gardendale Street would require right-only turns into and out of Consuelo Street (see **Final EIR Figure 2-1**), a stop-sign controlled intersection, which could result in queuing on eastbound Consuelo Street and southbound Paramount Boulevard, and would also require any traffic traveling northbound on Paramount Boulevard to make a U-turn at Puritan Street to enter the Project Site from Consuelo Street, which could also result in queuing. The right-turns from eastbound Consuelo Street to southbound Paramount Boulevard, which is controlled by a stop sign, as well as the U-turn from northbound to southbound Paramount Boulevard at Puritan Street, are traffic movements which rely on motorists to determine sufficient gaps in opposing traffic, and may be considered by some drivers to be not as safe as compared to traffic movements made at intersections controlled by traffic signals.

Nevertheless, while the County does not believe the trip distribution proposed in the comment is reasonably foreseeable, the Final EIR includes a Supplemental Traffic Analysis that alternatively considers that 15 percent of trips leaving the Project Site would use Consuelo Street (refer to Appendix H-3 to this Final EIR). As noted in the comment, a stop sign is provided on the eastbound Consuelo Street approach to its intersection with Paramount Boulevard. Due to a median on Paramount Boulevard in this location, only right-turn lanes from Consuelo Street to Paramount Boulevard southbound are allowed. This median also prohibits left turns into the Project Site from northbound Paramount Boulevard; the only allowed movement would be a right turn into the Project Site from Paramount Boulevard traveling southbound.

As a result of this alternative trip assignment, the Supplemental Traffic Analysis evaluates potential traffic impacts at the Paramount Boulevard / Puritan Street and Paramount Boulevard /

Consuelo Street-Cheyenne Street intersection. In addition, the Supplemental Analysis re-reviews the Paramount Boulevard / Gardendale Street intersection under this alternative assignment. Figure 1 of the Supplemental Analysis shows the alternative trip distribution and assignment under this scenario.

As shown in Table B of the Supplemental Traffic Analysis, the potential traffic impacts due to the Project would be less than significant based on the City of Downey traffic analysis procedures and thresholds of significance at the Paramount Boulevard / Puritan Street and Paramount Boulevard / Consuelo Street-Cheyenne Street intersection (as indicated on page 4 of the Supplemental Traffic Analysis). In addition, Project-related trips under the alternative assignment would continue to result in a less than significant impact at the Paramount Boulevard / Gardendale Street (as indicated on page 5 of the Supplemental Traffic Analysis) intersection under the City of Downey traffic analysis procedures and thresholds of significance, which is consistent with the findings of the Traffic Impact Study contained in Appendix H of the Draft EIR.

Response No. D23-2

The commenter expresses concerns regarding traffic and questions whether additional lanes should be provided on Gardendale Street. Pages 3.11-13 through 3.11-14 of Section 3.11, *Transportation and Traffic*, discuss how operational trips were generated and distributed. Approximately half of the Project trips (55 percent) would leave the Project Site using Gardendale Street, with the other half (45 percent) leaving the site using Imperial Highway. As shown in Table 3.11-6 on pages 3.11-16 through 3.16-18 of the Draft EIR, the existing with Project conditions intersection LOS did not identify impacts on Gardendale Street that would require the provision of additional vehicle lanes.

Figure 3.11-1 of the Draft EIR indicates the location of the study intersections on Gardendale Street that were evaluated for potential traffic impacts due to the Project, which include Intersection Nos. 6, 8, 15, 16, 17, 20, 23, 24 and 26. As shown in Table 3.11-9, four intersections along Gardendale Street are forecast to be significantly impacted by traffic due to the Project: No. 15 (Industrial Avenue / Gardendale Street), No. 16 (Erickson Avenue / Gardendale Street), No. 17 (Arizona Avenue / Gardendale Street), and No. 20 (Paramount Boulevard / Gardendale Street). For all of these intersections, impacts would be significant and unavoidable.

However, Section 3.11, *Transportation and Traffic*, determined that mitigation was required for Intersection No. 16 (Erickson Avenue / Gardendale Street) due to significant AM and PM peak hour impact using the significance thresholds established by the City of Downey and the City of South Gate. Mitigation Measure MM-TRA-3 requires the County of Los Angeles to provide a fair-share contribution towards the installation of a traffic signal. Based on the signal warrant analysis conducted for the proposed Project (refer to the Traffic Impact Study provided in Appendix H of the Draft EIR), there is sufficient side street volume to warrant the installation of a traffic signal at this intersection. Such payment shall be due after approval of such signalization by both the City of Downey and the City of South Gate.

As shown in Table 3.11-9, this mitigation measure would mitigate the AM and PM peak hour intersection impact to a less-than-significant level. However, since the intersection is under the joint jurisdiction of the City of Downey and the City of South Gate, and the improvement involves a policy decision by these agencies, the County cannot guarantee that those jurisdictions will agree with implementation of this mitigation measure. Therefore, page 3.11-29 of the Draft EIR concludes that the impact would remain significant and unavoidable.

For the other intersections along Gardendale Street, no feasible mitigation has been identified that would reduce the identified significant impact. Therefore, the addition of lanes on Gardendale Street are not necessary to reduce impacts, and all feasible mitigation, where possible, have been identified within the Draft EIR.

Response No. D23-3

This comment expresses concern for the number of parking spaces provided for the Sports Complex. The Sports Complex is not part of the proposed Project and was previously approved by the County November 2016. Therefore, concerns about the number of parking spaces provided for the Sports Complex are outside the scope of the project considered in the Draft EIR, and no further response is required.

Response No. D23-4

This comment expresses a desire for the County to work with the City of Downey and the City of South Gate to work on the side streets. The Draft EIR includes two Mitigation Measures, MM-TRA-2 and MM-TRA-3, that require the County to provide a fair-share contribution towards restriping the eastbound Imperial Highway approach to the Wright Road intersection to provide one additional through lane and the installation of a traffic signal at Erickson Avenue and Gardendale Street. If implemented, these improvements would be made by the City of South Gate and the City of Lynwood (for the Imperial Highway improvement proposed under Mitigation Measure MM-TRA-2) and the City of Downey and the City of South Gate (for the traffic signal improvement proposed under Mitigation Measure MM-TRA-3), and any lane closures, if required, would be proposed by and implemented by those jurisdictions when the improvement takes place. However, since the intersections are under the joint jurisdiction of the City of South Gate and the City of Lynwood for Mitigation Measure MM-TRA-2, and joint jurisdiction of the City of Downey and the City of South Gate for Mitigation Measure MM-TRA-3, and the improvement involves a policy decision by these agencies, the County cannot guarantee that those jurisdictions will agree with implementation of this mitigation measure. Therefore, the impact would remain significant and unavoidable.

It is unclear what the comment specifically refers to in terms of “side streets.” If the comment is about impacts in the Hollydale area, refer to Responses to Comment Nos. B5-46 and B5-55. As stated therein, the analysis of potential traffic impacts in the Hollydale area is provided in the Draft EIR through analysis of Intersection No. 18 (Industrial Avenue-Arizona Avenue / Main Street), which is located in the center of Hollydale area. Impacts at Intersection No. 18 would be less than significant under Existing with Project and Future with Project conditions.

If the comment is about access to and from the Project Site or impacts to intersections along Garfield Avenue, Gardendale Street, or Main Street, refer to Response to Comment No. B5-46. As stated therein, Intersection No. 9 (Garfield Avenue / Main Street), which is located just west of the Hollydale area, would also result in a less-than-significant impact under both conditions. Refer also to Table 3.11-8, Future with Project Conditions Intersection Levels of Service, and Table 3.11-9, Mitigated Intersection Levels of Service, in Section 3.11, *Transportation and Traffic*, for an identification of impacts to all study area intersections.

Response No. D23-5

This comment asks about the 244 market-rate apartments on Garfield Avenue and Imperial Highway. It is unclear from the comment what specifically is being asked. This apartment project is already identified and included as a cumulative project (refer to Table 2-8, Cumulative Projects in the Vicinity of the Project Site, in Chapter 2, *Project Description*, of the Draft EIR, specifically page 2-42). As a cumulative project, it was assumed in the cumulative analyses for the proposed Project.

Letter D24

Gary Hill

garyhil@prodigy.net

5511 Gardendale Street

South Gate, CA 90280

Letter received on October 30, 2019

Response No. D24-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project

The comment expresses concerns about the urban wildlife that lives on the Project Site. As discussed in Section 3.3, *Biological Resources*, of the Draft EIR, several comment letters received in response to the Notice of Preparation (NOP) requested that the Draft EIR consider impacts to the urban wildlife (e.g., where wildlife will go once their habitat is modified) present on the Project Site, which includes native species such as Botta's pocket gopher (*Thomomys bottae*), coyote (*Canis latrans*), raccoon (*Procyon lotor*), and striped skunk (*Mephitis mephitis*), and non-native species such as Virginia opossum (*Didelphis virginiana*), eastern fox squirrel (*Sciurus niger*), house mouse (*Mus musculus*), Norway rat (*Rattus norvegicus*), black rat (*Rattus rattus*), and feral cat (*Felis catus*). None of these species warrant protection under CEQA or any other law and were not analyzed further in Section 3.3, *Biological Resources*, of the Draft EIR. The discussion under Subsection 2.6, *Demolition and Construction*, within Chapter 2, *Project Description*, of the Draft EIR, provides a description of how wildlife would be cleared from the Project Site. As described therein, feral cats would be captured and relocated to a licensed or permitted cat sanctuary. The County would work with Animal/Pest Control to capture and relocate all other wildlife found on the Project Site to ensure that wildlife would not be a hazard to the Project Site during construction or to nearby residents after demolition. The comment does not raise significant environmental issues or address the adequacy of the EIR or CEQA process. Thus, no further response is required.

Letter D25

Gary Hill

garyhil@prodigy.net

5511 Gardendale Street

South Gate, CA 90280

Letter received on October 30, 2019

Response No. D25-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment expresses concern regarding traffic impacts from the Project as well as other proposed projects in the immediate area, including construction of apartment units, a sports complex, veterans housing and the proposed Metro station. All of the cumulative projects in the vicinity of the proposed Project mentioned in the comment are discussed in Section 2.7.6 of Chapter 2, *Project Description*, of the Draft EIR and analyzed in the cumulative analysis in the Draft EIR. The apartment projects are included as Cumulative Project Nos. 8, 18, 21, 24, 25, 26, 27, 31, and 33; the sports complex as No. 4; the veterans housing as No. 32; and the Metro station as No. 1.

The analysis of transportation impacts is based on the Traffic Impact Study, which is provided in Appendix H of the Draft EIR. The Traffic Impact Study addresses potential Project impacts in the context of existing conditions and future conditions. The Future Cumulative with Project conditions considers the vehicle trips generated by the Project to the future cumulative traffic volumes generated by 31 related projects that would potentially affect traffic conditions in the vicinity of the Project Site, including those related projects raised in this comment and as identified above. As discussed in Section 3.11, *Transportation*, of this Draft EIR, significant impacts would occur at four stop-controlled intersections and two signalized intersections during the peak hours under the Future Cumulative with Project conditions, including Intersection No. 3, Wright Road/Imperial Highway (AM); Intersection No. 7 - Garfield Avenue/Monroe Avenue, (AM/PM); Intersection No. 15 - Industrial Avenue/Gardendale Street, (AM); Intersection No. 16, Erickson Avenue/Gardendale Street, (AM/PM); Intersection No. 17 - Arizona Avenue/Gardendale Street, (AM); and Intersection No. 20 - Paramount Boulevard/Gardendale Street, (AM/PM). Where deemed reasonable and feasible, transportation mitigation measures have been developed to mitigate these impacted intersections.

The County will work with the respective jurisdictions where the impacted intersections are located, including the cities of South Gate, Downey, and Lynwood, to implement these mitigation measures, which include providing a fair-share contribution to intersection improvements for restriping the eastbound Imperial Highway approach to the Wright Road intersection and installation of a traffic signal for the Erickson Avenue/Gardendale Street Intersection. However,

the County lacks authority to implement intersection improvements in the local jurisdictions where the affected intersections are located and there is uncertainty as to whether the local jurisdictions will agree to implement the intersection improvements, Thus, the Draft EIR conservatively concludes that impacts on the affected intersections would be significant and unavoidable.

Letter D26

Michael Hayes

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Received on October 30, 2019

Response No. D26-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment expresses support for preservation and restoration of the historic buildings within the Project Site and indicates the commenter's belief that the site is of historic, cultural, and architectural significance. The County's extensive study of the historic, cultural, and architectural significance of the South Campus is presented in the Rancho Los Amigos Historic District Analysis Report (refer to Appendix D-1 to the Draft EIR) and in Section 3.4, *Cultural Resources*, of the Draft EIR. The comment provides a list of design firms and case studies where historic buildings have been adaptively reused. This information is acknowledged and will be provided to the decision-makers.

The comment also indicates that the structures are worthy of preservation and would be desirable as leasable space. As indicated in Chapter 4, *Alternatives*, of the Draft EIR, the County considered the Full Preservation Alternative as well as two scenarios of a Rehabilitation Alternative (refer to pages 4-12 through 4-18 of the Draft EIR). These alternatives were determined to be infeasible due to cost, susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures, and inability to meet the Project Objectives. Therefore, these alternatives were considered and rejected from further analysis in the Draft EIR.

The County identified three Project alternatives with varying levels of retention of the existing historic structures that are evaluated in Chapter 4 of the Draft EIR. More specifically, Alternative 2, Partial Preservation Alternative; Alternative 3, Reduced Demolition Alternative; and Alternative 4, Adaptive Reuse/Reduced Project Alternative (as revised in this Final EIR to include Scenario 2 as discussed further below), all include a scenario in which some of the buildings within the District are partially retained and mothballed and/or adaptively reused. Refer to Response to Comment Nos. C3-2 and C3-5 for a detailed discussion of alternatives that retain the Historic District and repurpose buildings for new uses. Please also refer to Response to Comment No. C3-3 for a discussion of the Rancho Los Amigos Historic District Tier 1-4 Feasibility Studies that were prepared beginning in 2007 and the Focused Feasibility Study prepared in 2020, that builds upon the previous studies. The 2020 Feasibility Study is discussed in detail in Response to Comment No. C3-3 and is included as Appendix L to the Final EIR.

The County has indicated in the EIR (refer to page 2-46), that there are no other planned or foreseeable County projects (or funds available) to develop the remaining parts of the South

Campus. There are also no other proposed private development activities where applications have been submitted. Additionally, the County has no intention of leasing out portions of the County-owned South Campus. The South Campus is the last remaining available County-owned land that would allow for the construction of needed modernized County facilities. By allowing a long-term lease to private developers (as suggested by the commenter), the County would lose long-term control over this last available space for County use. The use of County-owned property such as the South Campus to develop needed new facilities also eliminates the need for the County to use tax dollars to acquire buildings or land for County facilities.

The County can only retain buildings that are determined to be suitable for future County purposes, of which due to condition, floorplate site, security limitations, and seismic safety concerns, are limited to four buildings: LACO Nos. 1100 (Administration Building), 1238 (Casa Consuelo), 1300 (Power Plant), 1301 (Water Tower), 1302 (1302 (Shop & Laundry)). The retention, restoration, and reuse of these buildings are addressed in a new Alternative 4 Scenario 2 that has been developed and evaluated in this Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). Under Alternative 4 Scenario 2, a portion of the proposed County uses would be relocated into selected existing Individually Eligible buildings within the District which would be adaptively reused, in addition to the new construction proposed under the Project. Two individually eligible buildings would be adaptively reused to include various components of the proposed County uses: (1) LACO No. 1238 (Casa Consuelo) and (2) LACO No. 1300 (Power Plant). LACO No. 1100 (Administration Building) would, similar to existing conditions, be retained and occupied by the Los Angeles County Sheriff's Department (LASD) Professional Standards Division. LACO No. 1301 (Water Tower), an individually eligible structure, would be restored, repainted, and seismically upgraded. While the Water Tower would not be operational upon restoration, the Water Tower would remain on the Project Site and continue to serve as a focal point for the South Campus. LACO No. 1302 (Shop & Laundry), an individually eligible primary contributor, would be mothballed for future County use (no funding or uses are identified at this time; the scenario only includes retaining and mothballing the structure). In addition to the buildings to be retained, adaptively reused where indicated, and mothballed, this scenario would also build new construction in the Development Area as proposed under the Project. Similar to the Project, this scenario would construct 650,000 square feet of developed floor area for the ISD Headquarters, Probation Department Headquarters, and County Office Building. This scenario would also develop the ISD/Probation Parking Structure and County Office Parking Structure, as well as all necessary infrastructure improvements.

Response No. D26-2

This comment suggests how the existing buildings on the Project Site might be used, including placing County offices near the planned Metro Station and using some of the buildings to house agrarian workers and the neglected/disenfranchised, which was the initial use of the South Campus as the "Los Angeles County Poor Farm." The commenter states his suggestion would include restoration of the most feasibly restored/culturally significant buildings as well as the use of open space for community gathering place/park.

This commenter's proposal would result in greater costs to the County because it would involve the development of new buildings as well as the restoration of a greater number of buildings than proposed under the Project. New construction in southern part of the South Campus is considered in the Partial Preservation Alternative (refer to specifically Figure 4-2 of the Draft EIR) and would require the development of new infrastructure and utility connections, including telecommunication vaults, sanitary sewer mains, storm sewers, water mains, and additional roadways that do not currently exist in the larger circulation of the Project Site. However, this comment is noted and will be provided to the Los Angeles County Board of Supervisors for their review and consideration.

Letter D27

Donna Siemann
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10225 Foster Road
Downey, CA 90242
Received on November 1, 2019

Response No. D27-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project

The commenter expresses support for the removal of unoccupied structures, and the County's Project. The comment does not raise significant environmental issues or address the adequacy of the EIR or CEQA process. Thus, no further response is required.

Response No. D27-2

This comment states that there is available literature on the history of the Project Site available at the Administration Building and that there is a book written on the Project Site's history. While it is unclear what specific literature the commenter is referring to, the Draft EIR and the Rancho Los Amigos Historic District Analysis Report, which is provided in Appendix D-1 of the Draft EIR, both include various references and literature on the Project Site. The comment does not raise significant environmental issues or address the adequacy of the EIR or CEQA process. Thus, no further response is required.

Letter D28

Janet Adams

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Received on November 3, 2019

Response No. D28-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

The proposed Project would retain four individually eligible historic buildings, structures, and features including LACO Nos. 1100 (Administration/Safety Police Building), 1238 (Casa Consuelo), 1301 (Water Tower), plus the Moreton Bay Fig Tree. In addition, the County considered a Full Preservation Alternative and a Rehabilitation Alternative, which are discussed in Chapter 4, *Alternatives*, of the Draft EIR. While these alternatives would have preserved more buildings on the Project Site as suggested by the commenter and would meet the spirit and intent of historic preservation, based on the Rancho Los Amigos Historic District Tier 1- 4 Feasibility Studies (2007-2009 Feasibility Studies) referenced therein, these alternatives were determined to be infeasible due to cost, susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures, and inability to meet the Project Objectives. Therefore, these alternatives were initially considered but rejected from further analysis.

Additionally, the Draft EIR evaluates three alternatives with varying levels of retention of the existing structures: Alternative 2, Partial Preservation Alternative (both scenarios), Alternative 3, Reduced Demolition Alternative, and Alternative 4, Adaptive Reuse/Reduced Project Alternative, including an additional scenario under Alternative 4 as revised in this Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for a full description and analysis). All include a scenario in which the some of the buildings within the District are partially retained and mothballed and/or adaptively reused.

Subsequent to the publication of the Draft EIR, the County recognized that more up-to-date information was necessary to determine whether the alternatives carried forward for analysis in the Draft EIR would be feasible today given considerations related to architectural and structural conditions, mothballing requirements, and cost. Therefore, the County commissioned a Focused Feasibility Study (2020 Feasibility Study) (Harlan et al., 2020) to address the current requirements and costs of rehabilitating and adaptively reusing historical resources for current County needs, as well as determining the costs for mothballing. The 2020 Feasibility Study is provided in Appendix L to this Final EIR. As documented in the 2020 Feasibility Study, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural, seismic, and architectural upgrades to bring the historic buildings into serviceable use as required for compliance with Building Codes, as well as seismic, ADA, and Title 24 requirements.

Additionally, the majority of the buildings on the South Campus are not good candidates for reuse because of the lack of sufficient square footage and open floor plans.

Based upon information provided in the 2020 Feasibility Study, it was determined that a select group of additional historic structures are feasible for adaptive reuse and preservation. These structures were incorporated into Scenario 2 under Alternative 4 in the Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). A total of six of 61 District Contributors would be retained either through adaptive reuse, restoration, mothballing, or retention under Alternative 4 Scenario 2. The County Board of Supervisors will consider each of the alternatives, along with information in the record including but not limited to the 2020 Feasibility Study, when making their final decision on Project approval.

Response No. D28-2

The commenter expresses concern regarding the resulting traffic that the 3,000 County employees would bring to the area. The comment references the problem with potential Project-related trips utilizing Consuelo Street for access between the Project Site and Paramount Boulevard. The comment also references the existing condition at the Paramount Boulevard/Consuelo Street intersection whereby a northbound vehicle on Paramount Boulevard destined to westbound Consuelo Street must drive past Consuelo Street (because direct left-turns are not possible from northbound Paramount Boulevard to Consuelo Street due to the configuration of the raised median), complete a U-turn at the Puritan Street intersection, and then proceed southbound on Paramount Boulevard to turn right at Consuelo Street.

The commenter's primary concern are traffic impacts associated with the proposed Project. Traffic-related impacts are analyzed and disclosed in Section 3.11, *Transportation*, of the Draft EIR, and in the Traffic Impact Study, provided as Appendix H to the Draft EIR.

With respect to the commenter's concern about using Paramount Boulevard northbound to Consuelo Street to access the Project Site, pages 3.11-13 through 3.11-14 of Section 3.11, *Transportation*, of the Draft EIR discuss how operational trips were generated and distributed. Approximately half of the Project trips (55 percent) would leave the Project site using Gardendale Street, with the other half (45 percent) leaving the site using Imperial Highway. No trips were assumed to enter or exit the site using Consuelo Street. In fact, the Draft EIR indicated that the use of Consuelo Street is not desirable because of the reason the commenter mentions. As shown in **Final EIR Figure 2-1**, there is an existing median at the Paramount Boulevard/Consuelo Street intersection requiring northbound vehicles on Paramount Boulevard destined to westbound Consuelo Street to drive past Consuelo Street (because direct left-turns are not possible from northbound Paramount Boulevard to Consuelo Street due to the configuration of the raised median), complete a U-turn at the Puritan Street intersection, and then proceed southbound on Paramount Boulevard to turn right at Consuelo Street. Further, for egress, a stop sign is provided on the eastbound Consuelo Street approach to its intersection with Paramount Boulevard, whereas the eastbound approach of Gardendale Street to the Paramount Boulevard intersection is controlled by a traffic signal, thereby providing a preferred route for Project-related vehicles. Finally, if the traffic analysis assumed some Project-related trips using Consuelo Street instead of

Gardendale Street, it may have resulted in the understatement of the potential Project-related traffic impacts on Gardendale Street.

Nevertheless, the Final EIR includes a Supplemental Analysis (provided in Appendix H-3 of this Final EIR) that considers that 15 percent of Project trips leaving the Project Site would use Consuelo Street and 5 percent of Project trips would enter the Project site using Consuelo Street. As previously mentioned, a stop sign is provided on the eastbound Consuelo Street approach to its intersection with Paramount Boulevard. Due to a median on Paramount Boulevard in this location, only right-turn lanes from Consuelo Street to Paramount Boulevard southbound are allowed. This median also prohibits left turns into the Project Site from northbound Paramount Boulevard; the only allowed movement would be a right turn into the Project site from Paramount Boulevard traveling southbound.

As a result of this alternative trip assignment, the Supplemental Analysis evaluates potential traffic impacts at the Paramount Boulevard / Puritan Street and Paramount Boulevard / Consuelo Street-Cheyenne Street intersection. In addition, the Supplemental Analysis re-reviews the Paramount Boulevard / Gardendale Street intersection under this alternative assignment. Figure 1 of the Supplemental Analysis shows the alternative trip distribution and assignment under this scenario.

As shown in the Supplemental Analysis, the potential traffic impacts due to the Project would be less than significant based on the City of South Gate traffic analysis procedures and thresholds of significance at the Paramount Boulevard / Puritan Street and Paramount Boulevard / Consuelo Street-Cheyenne Street intersection. In addition, Project-related trips under the alternative assignment would continue to result in a less than significant impact at the Paramount Boulevard / Gardendale Street intersection under the City of South Gate traffic analysis procedures and thresholds of significance, which is consistent with the findings of the Traffic Impact Study contained in Appendix H of the Draft EIR.

Response No. D28-3

This comment also provides a conclusion to the commenter's letter, and no specific response is required.

Letter D29

Alexander B. Yotsov

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7912 Puritan Street

Downey, CA 90242

Received on November 5, 2019

Response No. D29-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

The commenter indicates they are a homeowner and resident in proximity to the Project Site and expresses concern that the proposed Project would increase traffic noise, and air pollution, overnight parking and speeding.

The commenter also raises concerns regarding rodents, trash, and lack of maintenance of the grass area along Consuelo Street to the north, on the back side of residences on Puritan Street. These issues stem largely from the vacant campus and are expected to be reduced through regular use, maintenance, and increased occupation of the area, as proposed by the County. With regard to rodents, as indicated in Chapter 2, *Project Description*, of the Draft EIR, the County would work with Animal/Pest Control to capture and relocate wildlife that are found on the Project Site to ensure that wildlife would not be a hazard to nearby residents after demolition occurs or during construction on the Project Site.

Section 3.2, *Air Quality*, and Section 3.10, *Noise*, of the Draft EIR provide an analysis of air quality and traffic noise, respectively, that would result from Project implementation. As analyzed therein, localized air quality impacts and noise impacts would both be less than significant with mitigation during construction and operation. Consuelo Street would be used for emergency access under implementation of the proposed Project, resulting in limited traffic along the street. Thus, emissions or traffic noise levels would not exceed air quality or noise thresholds along this street. The County would enforce activities such as overnight parking and speeding as provided for in the County codes.

The commenter also requests an analysis of the intersection of Paramount Boulevard and Consuelo Street. Because Consuelo Street was not identified as a point of ingress/egress to the Project Site, the intersection of Paramount Boulevard and Consuelo Street was not included in the study area intersections that were evaluated in the Traffic Impact Study, provided in Appendix H and summarized in Section 3.11, *Transportation*, of the Draft EIR. As indicated in Chapter 2, *Project Description*, of the Draft EIR, Consuelo Street would be repaved as part of the proposed roadway improvements that were analyzed as part of the Project. However, since the vehicular access pattern, which is described in Subsection 2.4.6, *Parking, Access, and Circulation*, in

Chapter 2 of the Draft EIR, would not include Consuelo Street except for emergency access, the Paramount Boulevard/Consuelo Street intersection was not evaluated. More specifically, as indicated in Subsection 2.4.6, vehicular access to the Project Site would be provided from Golondrinas Street, with access to the ISD/Probation Parking Structure provided from Rives Avenue and Golondrinas Street, and loading dock access provided from the re-aligned Dahlia Street. In addition, the County Office Building and County Office Parking Structure would be accessed from Flores Avenue or Laurel Street.

As discussed in Response to Comment No. B5-50, and as shown in Figure 7-1 of the Traffic Impact Study (Appendix H of the Draft EIR), approximately 15 percent of Project-related vehicle trips are forecast to exit the Project Site via Erickson Avenue, travel east on Gardendale Street, and then travel south on Paramount Boulevard. The Gardendale Street route is preferred as compared to Consuelo Street which is a local roadway with a stop sign provided on the eastbound Consuelo Street approach to its intersection with Paramount Boulevard. The eastbound approach of Gardendale Street to the Paramount Boulevard intersection is controlled by a traffic signal, thereby providing a preferred route for Project-related vehicles. Nevertheless, while the County does not believe the trip distribution through Consuelo Street is reasonably foreseeable, the Final EIR includes a Supplemental Traffic Analysis that alternatively considers that 15 percent of trips leaving the Project Site would use Consuelo Street. As shown in **Final EIR Figure 2-1**, due to a median on Paramount Boulevard at the intersection with Consuelo Street, only right-turn lanes from Consuelo Street to Paramount Boulevard southbound are allowed. This median also prohibits left turns into the Project Site from northbound Paramount Boulevard; the only allowed movement would be a right turn into the Project Site from Paramount Boulevard traveling southbound. As a result of this alternative trip assignment, the Supplemental Traffic Analysis evaluates potential traffic impacts at the Paramount Boulevard / Puritan Street and Paramount Boulevard / Consuelo Street-Cheyenne Street intersection. In addition, the Supplemental Analysis re-reviews the Paramount Boulevard / Gardendale Street intersection under this alternative assignment. Figure 1 of the Supplemental Analysis shows the alternative trip distribution and assignment under this scenario.

As shown in the Supplemental Traffic Analysis, the potential traffic impacts due to the Project would be less than significant based on the City of South Gate traffic analysis procedures and thresholds of significance at the Paramount Boulevard / Puritan Street and Paramount Boulevard / Consuelo Street-Cheyenne Street intersection, which is the same conclusion for the proposed Project. The alternative assignment would result in less-than-significant impacts under Future Cumulative with Project conditions at the Paramount Boulevard / Gardendale Street intersection under the City of South Gate and City of Downey traffic analysis procedures and thresholds of significance, while it would result in significant impacts using the City of Paramount's traffic analysis procedures and thresholds of significance, similar to the proposed Project. However, this assignment would require right-only turns into and out of Consuelo Street, a stop-sign controlled intersection, which could result in queuing on eastbound Consuelo Street and southbound Paramount Boulevard, and would also require any traffic traveling northbound on Paramount Boulevard to make a U-turn at Puritan Street to enter the Project site from Consuelo Street, which could also result in queuing. The right-turns from eastbound Consuelo Street to southbound Paramount Boulevard, which is controlled by a stop sign, as well as the U-turn from northbound to southbound Paramount Boulevard at Puritan Street, are traffic movements which rely on

motorists to determine sufficient gaps in opposing traffic, and may be considered by some drivers to be not as safe as compared to traffic movements made at intersections controlled by traffic signals. For these reasons, it was assumed that traffic entering and exiting the Project site would more likely use Erickson Avenue, which will either be a signal-controlled intersection if Mitigation Measure MM-TRA-3 were implemented, as proposed in the Draft EIR, or a stop-sign controlled intersection (without a median on Gardendale Street), which would allow all turning movements into and out of the Project Site, traffic permitting as well complete turning movements at the Paramount Boulevard / Gardendale Street intersection, which is currently controlled by a traffic signal.

Response No. D29-2

This comment suggests that property owners along Consuelo Street would be adversely affected with resultant decline in property values resulting from the proposed Project. In addition, the comment suggests that the County consider abandoning the right-of-way and granting land to property owners or monetarily compensating property owners for the assumed detrimental economic effects of the development of the proposed Project. The comment concludes by suggesting to arrange a neighborhood meeting with affect property owners, if needed.

The purpose of an EIR is to identify the significant effects on the environment that would result from a project (Public Resources Code Section 21002.1(a)). Environment is defined as including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance (Public Resources Code Section 21060.5). Thus, the commenter's concerns regarding property values are outside the scope of the CEQA analysis. However, they will be shared with the Board of Supervisors prior to its final determination on the Project.

In addition, the Project would result in benefits to the area through the redevelopment of the property. As discussed in Chapter 2, *Project Description*, of the Draft EIR, the Project would create a modernized and revitalized County administrative campus within the Project Site. In doing so, the Project would help eliminate existing blight within the South Campus. In addition, as noted in Chapter 2, *Project Description*, of the Draft EIR, the Project Site has been subject to reoccurring incidents of arson, vandalism, theft, and vagrant occupation. As a result of these incidences, the County has implemented safety measures within the South Campus including: fencing off the areas around each of the fire-damaged buildings; installing approximately 2,000 feet of 8-foot high, chain link fence with 200 "No Trespassing" signs around the South Campus; repairing existing fencing; and boarding up and/or reinforcing existing boards on all building wall openings in order to secure the buildings, among other measures. The demolition of structures under the Project would further efforts to address public health and safety and environmental concerns within the Project Site. Development of the Project would also serve to integrate the South Campus into the surrounding community thereby enhancing the health and wellbeing of the residents in the area. The Project would also recognize unique, culturally important historic elements of the South Campus by retaining selected buildings, open spaces, and landscape features to the extent economically and environmentally feasible. These benefits could result in increases to property values. However, the suggestions provided in the comment are noted and will be provided to the Los Angeles County Board of Supervisors for their review and consideration.

Letter D30

Gary Hill

5511 Gardendale St.

South Gate, CA 90280

Written comment received on November 6, 2019

Response No. D30-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

The comment expresses concern for the urban wildlife that lives on the Project Site and questions whether the wildlife will disperse into the surrounding residential area. Refer to Response to Comment No. D24-1, a comment provided by the same commenter, discussing how the Draft EIR addresses how wildlife will be relocated from the Project Site.

Letter D31

Jack Russell

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Downey, CA 90242-3418

Written comment received on November 6, 2019

Response No. D31-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment expresses concern for preserving the Moreton Bay Fig on the Project Site, and encloses three scanned pages of Donald Hodel's book, *Exceptional Trees of Los Angeles*, regarding three species in particular: Gum Myrtle, Bunya-Bunya, and Moreton Bay Fig. The second and third pages of the attached scanned pages notes the Bunya-Bunya tree (*Araucaria bidwillii*) and Moreton Bay Fig are located on the Project Site.

The comment references the Moreton Bay Fig Tree, which fronts Erickson Avenue near LACO No.1261 (the Auditorium) and is located outside the Development Area. As discussed on pages 2-24 and 2-31, in Chapter 2, *Project Description*, of the Draft EIR, the Moreton Bay Fig is a Landmark Tree and a contributor to the Historic District; the Moreton Bay Fig would not be affected by development of the proposed Project as it is outside of the Development Area and would remain on-site.

The Tree Inventory conducted for the Project Site and provided as Appendix C of the Draft EIR identified 598 trees on the Project Site. The Tree Inventory surveyed 598 trees, but did not identify any Gum Myrtle trees (*Angophora costata*) on the Project Site. The Tree Inventory identified five instances of the Bunya-Bunya tree (*Araucaria bidwillii*) on the Project Site. However, this tree is not a California native tree species. As the County does not require non-native tree species to be protected or retained, it is not required that the Bunya-Bunya tree (*Araucaria bidwillii*) be protected or retained on-site. As discussed in Chapter 2, *Project Description*, of the Draft EIR, existing trees on-site would be retained where possible; however, it is assumed that the majority of trees within the Development Area would require removal, which could include the Bunya-Bunya trees (*Araucaria bidwillii*).

The balance of the comment does not raise environmental issues and, therefore, no further response is required.

Letter D32

Lynda Mahaffey
7839 Kingbee St.
Downey, CA 90242

Written comment received on November 6, 2019

Response No. D32-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

The comment expresses concern for the method of removal of rodents (i.e., urban wildlife) that live on the Project Site prior to construction of the proposed Project, and particular concern regarding the use of poison. The discussion under Subsection 2.6, *Demolition and Construction*, within Chapter 2, *Project Description*, of the Draft EIR, provides a description of how wildlife would be cleared from the Project Site. As described therein, the County will work with Animal/Pest Control to capture and relocate wildlife found on the Project Site to ensure that wildlife would not be a hazard to the Project Site during construction and to nearby residents after demolition. Wildlife found on the Project Site include native species such as Botta's pocket gopher (*Thomomys bottae*), coyote (*Canis latrans*), raccoon (*Procyon lotor*), and striped skunk (*Mephitis mephitis*), and non-native species such as Virginia opossum (*Didelphis virginiana*), eastern fox squirrel (*Sciurus niger*), house mouse (*Mus musculus*), Norway rat (*Rattus norvegicus*), black rat (*Rattus rattus*), and feral cat (*Felis catus*). Consistent with current practice implemented by Animal/Pest Control, poison would not be used as a means to remove animals from the Project Site, including the black rat (*Rattus rattus*), and, as such, would not inadvertently affect pet cats and dogs living in the Project vicinity.

Letter D33

Walter Sebring

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Received on November 7, 2019

Response No. D33-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment questions why many of the buildings on the Project Site cannot be retained. Generally, many of the buildings on-site have been boarded up since roughly 1991 and are in varying degrees of abandonment and deterioration. Subsection 2.2.2, *Rancho Los Amigos South Campus Existing Conditions*, of Chapter 2, *Project Description*, of the Draft EIR, provides a discussion of the conditions of the existing buildings on the Project Site. As discussed therein, nearly all the buildings within the Project Site are in poor structural condition. To bring the buildings up to current building code standards would require moderate to very complex seismic retrofit and extensive structural upgrades. In addition, nearly all the buildings contain some amount of hazardous materials, including asbestos-containing materials (ACMs), lead-based paint (LBP), and polychlorinated biphenyls (PCBs). These environmental hazards are located within the buildings but have also extended to the external parts of the buildings (decayed building materials) and pose a potential public and environmental health and safety concern.

However, the proposed Project would retain four individually eligible historic buildings, structures, and features including LACO Nos. 1100 (Administration/Safety Police Building), 1238 (Casa Consuelo), 1301 (Water Tower), plus the Moreton Bay Fig Tree. In addition, the County considered a Full Preservation Alternative and two scenarios of a Rehabilitation Alternative, which are discussed in Chapter 4, *Alternatives*, of the Draft EIR. While these alternatives would have preserved more buildings on the Project Site as suggested by the commenter and would meet the spirit and intent of historic preservation, based on the Rancho Los Amigos Historic District Tier 1- 4 Feasibility Studies (2007-2009 Feasibility Studies) referenced therein, these alternatives were determined to be infeasible due to cost, susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures, and inability to meet the Project Objectives. Therefore, these alternatives were initially considered but rejected from further analysis.

Additionally, the Draft EIR evaluates three alternatives with varying levels of retention of the existing structures: Alternative 2, Partial Preservation Alternative (both scenarios); Alternative 3, Reduced Demolition Alternative; and Alternative 4, Adaptive Reuse/Reduced Project Alternative, including an additional scenario under Alternative 4 as revised in this Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). All include a scenario in which some of the buildings within the District are partially retained and mothballed and/or adaptively reused.

Subsequent to the publication of the Draft EIR, the County recognized that more up-to-date information was necessary to determine whether the alternatives carried forward for analysis in the Draft EIR would be feasible today given considerations related to architectural and structural conditions, mothballing requirements, and cost. Therefore, the County commissioned a Focused Feasibility Study (2020 Feasibility Study) (Harlan et al., 2020) to address the current requirements and costs of rehabilitating and adaptively reusing historical resources for current County needs, as well as determining the costs for mothballing. The 2020 Feasibility Study is provided in Appendix L to this Final EIR. As documented in the 2020 Feasibility Study, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural, seismic, and architectural upgrades to bring the historic buildings into serviceable use as required for compliance with Building Codes, as well as seismic, ADA, and Title 24 requirements. Additionally, the majority of the buildings on the South Campus are not good candidates for reuse because of the lack of sufficient square footage and open floor plans.

Based upon information provided in the 2020 Feasibility Study, it was determined that a select group of additional historic structures are feasible for adaptive reuse and preservation. These structures were incorporated into Scenario 2 under Alternative 4 in the Final EIR. A total of six of 61 District Contributors would be retained either through adaptive reuse, restoration, mothballing, or retention under Alternative 4 Scenario 2. The County Board of Supervisors will consider each of the alternatives, along with information in the record including but not limited to the 2020 Feasibility Study, when making their final decision on Project approval.

Response No. D33-2

This comment questions whether the County would use any of the land on the Project Site to provide housing to the homeless population. At this time, there are no plans to provide housing on the Project Site. It is currently unknown how much development, if any, would occur on the remaining available 39-acres of the 74-acre area of the Rancho Los Amigos South Campus. It should be noted that the County is addressing homelessness as part of their Homeless Initiative (see <https://homeless.lacounty.gov/>). However, that initiative is separate from the Project analyzed within this EIR. This comment is noted and will be provided to the Los Angeles County Board of Supervisors for their review and consideration.

Letter D34

Erica Connelly

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Received on November 13, 2019

Response No. D34-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment expresses opposition to the demolition of the buildings in the Project Site and suggests preservation and re-use of those buildings instead. The Draft EIR discussion in Section 2.2.2 of Chapter 2, *Project Description*, of the Draft EIR discusses the existing conditions and various concerns regarding preservation of the unoccupied structures on the Project Site. The unsecured buildings in their current condition present a public safety concern and the County has considered these concerns in developing the Project as proposed. The Project Objectives outlined in Section 2.3 articulate the County's need for the South Campus.

However, the proposed Project would retain four individually eligible historic buildings, structures, and features including LACO Nos. 1100 (Administration/Safety Police Building), 1238 (Casa Consuelo), 1301 (Water Tower), plus the Moreton Bay Fig Tree. In addition, the County considered a Full Preservation Alternative and two scenarios of a Rehabilitation Alternative, which are discussed in Chapter 4, *Alternatives*, of the Draft EIR. While these alternatives would have preserved more buildings on the Project Site as suggested by the commenter and would meet the spirit and intent of historic preservation, based on the Rancho Los Amigos Historic District Tier 1- 4 Feasibility Studies (2007-2009 Feasibility Studies) referenced therein, these alternatives were determined to be infeasible due to cost, susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures, and inability to meet the Project Objectives. Therefore, these alternatives were initially considered but rejected from further analysis.

Additionally, the Draft EIR evaluates three alternatives with varying levels of retention of the existing historic structures: Alternative 2, Partial Preservation Alternative (both scenarios); Alternative 3, Reduced Demolition Alternative; and Alternative 4, Adaptive Reuse/Reduced Project Alternative, including an additional scenario under Alternative 4 as revised in this Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis), all include a scenario in which some of the buildings within the District are partially retained and mothballed and/or adaptively reused. Subsequent to the publication of the Draft EIR, the County recognized that more up-to-date information was necessary to determine whether the alternatives carried forward for analysis in the Draft EIR would be feasible today given considerations related to architectural and structural conditions, mothballing requirements, and cost. Therefore, the County commissioned a Focused Feasibility Study (2020 Feasibility Study) (Harlan et al., 2020) to

address the current requirements and costs of rehabilitating and adaptively reusing historical resources for current County needs, as well as determining the costs for mothballing. The 2020 Feasibility Study is provided in Appendix L to this Final EIR. As documented in the 2020 Feasibility Study, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural, seismic, and architectural upgrades to bring the historic buildings into serviceable use as required for compliance with Building Codes, as well as seismic, ADA, and Title 24 requirements. Additionally, the majority of the buildings on the South Campus are not good candidates for reuse because of the lack of sufficient square footage and open floor plans.

Based upon information provided in the 2020 Feasibility Study, it was determined that a select group of additional historic structures are feasible for adaptive reuse and preservation. These structures were incorporated into Scenario 2 under Alternative 4 in the Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). A total of six of 61 District Contributors would be retained either through adaptive reuse, restoration, mothballing, or retention under Alternative 4 Scenario 2. The County Board of Supervisors will consider each of the alternatives, along with information in the record including but not limited to the 2020 Feasibility Study, when making their final decision on Project approval.

Letter D35

Francesca Anne

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Received on November 13, 2019

Response No. D35-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment expresses a desire for the proposed Project to restore/preserve the existing buildings within the District, identifies benefits of restoration/preservation, and provides examples where historic buildings have been retained in various locations across the country. The proposed Project would retain four individually eligible historic buildings, structures, and features including LACO Nos. 1100 (Administration/Safety Police Building), 1238 (Casa Consuelo), 1301 (Water Tower), plus the Moreton Bay Fig Tree. In addition, the County considered a Full Preservation Alternative and a Rehabilitation Alternative, which are discussed in Chapter 4, *Alternatives*, of the Draft EIR. While these alternatives would have preserved more buildings on the Project Site as suggested by the commenter and would meet the spirit and intent of historic preservation, based on the Rancho Los Amigos Historic District Tier 1- 4 Feasibility Studies (2007-2009 Feasibility Studies) referenced therein, these alternatives were determined to be infeasible due to cost, susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures, and inability to meet the Project Objectives. Therefore, these alternatives were initially considered but rejected from further analysis.

Additionally, the Draft EIR evaluates three alternatives with varying levels of retention of the existing structures: Alternative 2, Partial Preservation Alternative (both scenarios), Alternative 3, Reduced Demolition Alternative, and Alternative 4, Adaptive Reuse/Reduced Project Alternative, including an additional scenario under Alternative 4 as revised in this Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis) and further discussed below. All include a scenario in which the some of the buildings within the District are partially retained and mothballed and/or adaptively reused.

Subsequent to the publication of the Draft EIR, the County recognized that more up-to-date information was necessary to determine whether the alternatives carried forward for analysis in the Draft EIR would be feasible today given considerations related to architectural and structural conditions, mothballing requirements, and cost. Therefore, the County commissioned a Focused Feasibility Study (2020 Feasibility Study) (Harlan et al., 2020) to address the current requirements and costs of rehabilitating and adaptively reusing historical resources for current County needs, as well as determining the costs for mothballing. The 2020 Feasibility Study is provided in Appendix L to this Final EIR. As documented in the 2020 Feasibility Study, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural,

seismic, and architectural upgrades to bring the historic buildings into serviceable use as required for compliance with Building Codes, as well as seismic, ADA, and Title 24 requirements. Additionally, the majority of the buildings on the South Campus are not good candidates for reuse because of the lack of sufficient square footage and open floor plans.

Based upon information provided in the 2020 Feasibility Study, it was determined that a select group of additional historic structures are feasible for adaptive reuse and preservation. These structures were incorporated into Scenario 2 under Alternative 4 in the Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). A total of six of 61 District Contributors would be retained either through adaptive reuse, restoration, mothballing, or retention under Alternative 4 Scenario 2. The County Board of Supervisors will consider each of the alternatives, along with information in the record including but not limited to the 2020 Feasibility Study, when making their final decision on Project approval.

Response No. D35-2

The commenter indicates an economic benefit associated with historic preservation and cites a study conducted by the Utah Heritage Foundation finding economic benefits of heritage tourism.

The County has considered the economic feasibility associated with historic preservation, as discussed above in Response to Comment No. D35-1. Potential economic benefits associated with heritage tourism are noted and will be provided to the decision-maker.

Response No. 35-3

The commenter indicates environmental benefits associated with historic preservation such as reduced demolition waste, energy use, and use of new raw materials that require the use of non-renewable resources through manufacturing, transport and demolition. The Draft EIR provides an environmental analysis of the potential impacts associated with the construction and operation of the Project, including the issue areas raised in the comment. As required by CEQA Guidelines Section 15126(c), Subsection 5.2, Significant Irreversible Environmental Changes, of Chapter 5, *Other CEQA Considerations*, of the Draft EIR addresses the use of renewable and non-renewable resources that would occur with Project implementation. As indicated on page 5-4 of the Draft EIR, the Project's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant, and the limited use of nonrenewable resources is justified.

Construction of the proposed Project would retain four individually eligible buildings, structures and features and includes removal of 57 of the 61 District contributors, resulting in a loss of 94 percent (a majority) of the District. The buildings, structures, and features that would be retained as part of the proposed Project include LACO No. 1100 (Administration/ Building), No. 1238 (Casa Consuelo), and No. 1301 (Water Tower). LACO No. 1100 and No. 1238 are contributors to the District and also individually eligible for the National Register and California Register Criteria C/3 and Los Angeles County Landmark Criteria 3. The Project would also retain the Moreton Bay Fig Tree, which is a contributor to the District and eligible under Los Angeles

County Landmark Criteria 6 and 7. The Draft EIR includes discussion of mitigation measures addressing the commenter's concern regarding the preservation of Rancho Los Amigos' history. Specifically, as stated on page 4-45 of Chapter 4, *Alternatives*, of the Draft EIR, Mitigation Measure MM-CUL-1d requires the County to retain a Qualified Preservation Professional to prepare and implement a Mothballing Plan for select buildings/structures that would be retained under the Project in accordance with National Park Service guidelines and Mitigation Measure MM-CUL-1e requires the County develop an avoidance and protection plan for retained historic resources.

In addition, the Draft EIR analyzes alternatives that would retain select buildings/structures under Alternative 2 (Scenarios 1 and 2), Alternative 3, and Alternative 4. Furthermore, the Final EIR includes a new revised Alternative 4 Scenario 2 that would retain all Individually Eligible resources on the Project Site through continued use, restoration, adaptive reuse and mothballing. To mitigate the significant impacts to the retained District Contributors and Individually Eligible buildings, the Draft EIR proposes implementation of Mitigation Measures MM-CUL-1d and MM-CUL-1e to ensure the retained historical resources would be preserved in conformance with the Secretary of Interior Standards, and to reduce impacts to less than significant levels to the retained Individually Eligible resources; however, impacts to historical resources would still be significant and unavoidable to the District (refer to specifically pages 3.4-41 through 3.4-45 for detailed text of mitigation measures).

As discussed above, the County commissioned a 2020 Feasibility Study to address the current requirements and costs of rehabilitating and adaptively reusing historical resources for current County needs, as well as the costs for mothballing. Refer to Appendix L to the Final EIR. The 2020 Feasibility Study found that all evaluated structures have substantially deteriorated due to the passage of time, weather, fires, seismic activity, high winds, water intrusions, soil settlement, and vandalism. Additionally, higher expected earthquake forces, unknown faults, and damage caused by recent earthquakes (i.e., Northridge earthquake) have necessitated revisions to the building code, resulting in more stringent engineering design and retrofit requirements. The reinforcement, detailing, material variance, and design of many of the masonry and concrete buildings on the Project Site would present a high risk of significant damage and risk to occupants during even a moderate seismic event. Consequently, each building would need to be upgraded to current seismic and Building Code. Additionally, hazardous materials such as asbestos and lead would need to be remediated before the buildings could be either adaptively reused or demolished. Generally, as the commenter notes, recycling old buildings often reduces construction waste; however, due to the deteriorated condition and structural characteristics of the historic buildings on the Project Site, rehabilitation and adaptive reuse of the historic buildings would likely require similar energy use and non-renewable resources comparable to what is required for the ground-up construction proposed under the Project to meet current California Green Building Standards (California Code of Regulations, Title 24, Part 11) requirements. Furthermore, one of the Project's objectives includes achievement of a LEED Gold Standard rating, which would be met more efficiently in new construction than in adaptively reused buildings.

CEQA Guidelines section 15064.5 states a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. Section 3.4, *Cultural Resources* of the Draft EIR provides detailed analysis of the Project's potential impacts on historic resources. The Draft EIR proposes mitigation measures to reduce the significant impact that would result from the demolition of historic buildings. As indicated in Section 3.4, Mitigation Measure MM-CUL-1a requires a Historic American Landscape Survey (HALS) Standard Format documentation of the District's contributing Site Plan, which has been identified as a District contributor.¹⁰ Mitigation Measure MM-CUL-1b requires implementation of an interpretive and commemorative program documenting the historical significance of Rancho Los Amigos and the Los Angeles County Poor Farm. The program will feature a variety of informational programming that may include an on-site interpretation program, artifacts, documentary film, and/or commemorative plaques to educate the public on the importance of the site. Mitigation Measure MM-CUL-1c requires preparation of an inventory of the 57 District contributors that will be demolished and identification of their key character-defining physical features appropriate for salvage and interpretation. Salvageable material would then be collected and made available for use in restoration or rehabilitation projects on the Project Site, or in the interpretive program to be developed under Mitigation Measure MM-CUL-1b. While these measures would serve to reduce the significant impact and would document the history of the Project Site, impacts under the Project would remain significant and unavoidable.

¹⁰ Recordation of 61 contributing buildings, structures, and features was previously completed in 2008. However, the Site Plan was omitted as a District contributor in the previous studies and has not been documented.

Letter D36

Renee Acero

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Received on November 19, 2019

Response No. D36-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment serves as an introduction to the remainder of the letter. Detailed responses are provided in Responses to Comment Nos. D36-2 through D36-6.

Response No. D36-2

This comment states that traffic, specifically at the intersections of Paramount Boulevard / Gardendale Street and Erickson Avenue / Gardendale Street, is of concern. These two intersections are identified in Section 3.11, *Transportation*, of the Draft EIR and, as provided in Table 3.11-3, starting on page 3.11-4, Intersection No. 20, Paramount Boulevard/Gardendale Street and would have an existing Level of Service (LOS) of C in both the AM and PM peak hours, and Intersection No. 16, Erickson Avenue/Gardendale Street would have an existing LOS of D in the AM peak hour and C in the PM peak hour. The analysis provided in in Section 3.11, *Transportation*, of the Draft EIR determined that these two intersections would be significantly impacted by Project-generated traffic. Potential mitigation measures to alleviate the significant traffic impacts at all of the affected intersections are described in the Draft EIR beginning on page 3.11-27.

Intersection No. 16, Erickson Avenue/Gardendale Street is discussed beginning on page 3.11-28 of the Draft EIR. A significant AM and PM peak hour impact was identified at this intersection using the significance thresholds established by the City of Downey and the City of South Gate. To address this impact, the Mitigation Measure MM-TRA-3 is proposed. The commenter incorrectly asserts that the County will not take financial responsibility of the traffic impacts caused by the proposed Project, which would be left up to the cities. Mitigation Measure MM-TRA-3 would require the County to provide a fair-share contribution towards the installation of a traffic signal at Erickson Avenue and Gardendale Street. If implemented, these improvements would be made by the City of Downey and the City of South Gate. As shown in Table 3.11-9, Mitigation Measure MM-TRA-3 would mitigate the AM and PM peak hour intersection impact to a less-than-significant level. However, as described in the Draft EIR (e.g., page 3.11-29), these intersections are outside the jurisdiction of the Lead Agency (the County) as they are located in the cities of Downey and South Gate and the improvement involves a policy decision by these agencies. Thus, the County cannot guarantee that those jurisdictions will agree with the

implementation of Mitigation Measure MM-TRA-3. Therefore, the impact would remain significant and unavoidable.

Intersection No. 20, Paramount Boulevard/Gardendale Street is discussed beginning on page 3.11-29 of the Draft EIR. A significant AM and PM peak hour impact was identified at this intersection using the significance thresholds established by the City of Downey and the City of Paramount. The analysis provided in Section 3.11, *Transportation*, of the Draft EIR determined that this intersection is completely built-out, meaning that no street improvements would be possible without modifying the existing curb-to-curb street widths, which would likely require the acquisition of private property and removal of businesses located adjacent to the intersection. This would pose economic and policy infeasibilities. The additional environmental impacts associated with demolition and construction that would require with street improvements, such as noise and air quality and removal or shortening of existing sidewalks/pedestrian facilities, and inconsistency with policy objectives of providing “a cohesive civic district” make mitigation infeasible. Therefore, as there are no reasonable or feasible mitigation measures available at this intersection, the impact of the proposed Project would remain significant and unavoidable.

Response No. D36-3

This comment states that the Draft EIR did not discuss a housing development at the corner of Gardendale and Garfield as part of the cumulative analysis. This response assumes the commenter is referring to the Former American Legion Site. When the Draft EIR was prepared in September 2017, the County asked the City of South Gate for a list of reasonably foreseeable future projects. The City of South Gate did not identify this project as reasonably foreseeable future project. Further, when contacted again by Linscott, Law, & Greenspan (LLG) in February 2019 to inquire about any updates to the list of related projects, neither the City of Downey nor the City of South Gate provided any additional information regarding this project. The County entered into an Exclusive Negotiation Agreement with Abode Communities and PATH Ventures on September 24, 2019, just two weeks before release of the Draft EIR, to discuss the potential terms of the development of a 100-unit affordable housing project on the County-owned Former American Legion Site property located at 11269 Garfield Avenue in the City of Downey (City of South Gate, 2019). Based on this timing, the Draft EIR does not discuss or analyze the Former American Legion site in depth.

The American Legion project, located approximately one mile from the Project Site, would be forecast to generate approximately 52 AM peak hour trips and 38 PM peak hour trips. When compared to the total forecast of vehicle trips for the related projects provided in Table 6-1 of the Traffic Impact Study (470 total AM peak hour trips and 748 total PM peak hour trips), the American Legion project would increase the total AM peak hour trips by 11 percent and the total PM peak hour trips by 5 percent. As described on page 32 of the Traffic Impact Study, as well as on page 3.11-14 in Subsection 3.11.5, *Environmental Impact Analysis*, of Section 3.11, *Transportation*, of the Draft EIR, the inclusion of the ambient traffic factor is intended to account for potential future traffic growth related to development projects not identified in the list of cumulative projects. Thus, the American Legion project’s traffic impacts are accounted for in the proposed Project’s Draft EIR.

In regard to the American Legion project's effect on public safety, as the project would be located within the City of Downey and the City of Downey Fire Department (DFD) and City of Downey Police Department would be the responsible agencies to provide fire and police protection services for that project. As stated on page 5-7 of Chapter 5, *Other CEQA Considerations*, of the Draft EIR, the Project would not result in the need for expanded or additional personnel and equipment from the DFD. As the American Legion project is smaller than the proposed Project as analyzed in the Draft EIR, it is likely that the American Legion project would similarly not result in the need for expanded or additional personnel and equipment from the DFD. As further stated on page 5-7, the Project Site would be served by the Los Angeles County Sheriff's Department (LASD), County Services Bureau (CSB), and therefore would not be relying on the same police protection services from the City of Downey Police Department as the American Legion project. Therefore, the American Legion project would not result in impacts to the police protection services that would be provided for the Project.

The commenter raises the issue of the American Legion project's impacts on public services. This response assumes the commenter is referring to utilities. As stated on page 3.13-19 of Section 3.13, *Utilities and Service Systems*, of the Draft EIR, in regard to wastewater, any project within the City of Downey's service area, including the American Legion project, would be subject to applicable CEQA review and would be required to comply with the other applicable laws and regulations protecting environmental resources. In regard to water, the American Legion project would not trigger the provisions of Senate Bill 610 and would not require a Water Supply Assessment. The American Legion project would be required to fund the cost of water-related infrastructure to serve the site if necessary. In regard to solid waste, the American Legion project would be required to meet the 75 percent diversion rate by 2020 as required by Assembly Bill 341, which would significantly reduce the amount of solid waste generated and distributed to the landfills that serve the County.

Response No. D36-4

This comment expresses concern regarding the proposed design of the buildings and questions why the Project should not keep in character with the remaining historical buildings, which include the Administration/Safety Policy Building (LACO No. 1100), Casa Consuelo (LACO No. 1238), and, Water Tower (LACO No. 1301). The comment incorrectly characterizes the design of the proposed new buildings on the Project Site as "ultra-modern" buildings. Section 3.1, *Aesthetics*, of the Draft EIR, analyzes the effects of the Project's impacts related to aesthetics. As discussed therein, although the designs for the new construction have not been completed, the architectural style of the new buildings would, as mandated in the County's Best Practices for Design Excellence, be modern, efficient, and sustainable. The design would not attempt to recreate the former styles represented on the existing subject property and would be differentiated from the remaining historic buildings in order to not present a false sense of history. Materials used for the Project would be selected based on durability, minimal maintenance, aesthetic longevity, sustainability, color retention, structural integrity, and ease of upkeep and replacement. While the scale and massing of some of the new construction would be greater than adjacent historic buildings, aggressive setbacks and step-backs, as well as flat roofs with parapets set back from building façades would be used to visually minimize the perceived height of the buildings.

Therefore, although the new buildings would not be compatible with the size, scale, and proportion of the existing buildings, the new buildings would provide a landscaped new development with visual variety to the Project Site. The Project would enhance and improve the roadways and pedestrian environment while maintaining a view of the remaining historic buildings on the Project Site. However, as the new buildings would still change the existing visual character of the Project Site, the Draft EIR identifies impacts as potentially significant and includes mitigation that would reduce the impact to less than significant. As discussed on page 3.1-24 in Section 3.1, *Aesthetics*, of the Draft EIR, the Project would implement Mitigation Measures MM-CUL-1b and CUL-1c to ensure that significant architectural characteristics would be captured in the Project as informational programming or potentially as restoration or rehabilitation projects on the Project Site. Implementation of an Interpretive and Commemorative Program (Mitigation Measure MM-CUL-1b) would capture the visual characteristics and significance of the Project Site. Under Mitigation Measure MM-CUL-1c, an inventory of the character-defining physical features of the buildings to be demolished would be conducted, and salvageable items and materials would be made available for the interpretive program or for use in future restoration/rehabilitation projects on the Project Site.

Response No. D36-5

This comment expresses concern regarding public safety and police protection services and requests the reasoning for the Draft EIR's conclusion that "with the addition of new buildings and security features, there will be a decrease in the amount of CSB security needed across the Project Site."

Chapter 5, *Other CEQA Considerations*, provides an analysis of the proposed Project's impacts to the Los Angeles County Sheriff's Department (LASD) County Services Bureau (CSB). As discussed therein, the CSB currently provides security to the Project Site on a 24-hour basis, with one deputy and one security officer assigned to each shift (day, night, and early mornings) seven days a week. While CSB notes that law enforcement service requirements for the South Campus would increase upon Project buildout, it is likely that with the addition of new buildings and security features, there will be a decrease in the amount of CSB security needed across the Project Site. This is due to the nature of the Project as an office development, which would require consistent use of the proposed buildings on the Project Site and would be constantly monitored. Additionally, the potential for vandalism and burglaries at the Project Site during Project construction would be reduced by the inclusion of security fencing and cameras during construction. The County will also continue to coordinate security measures with LASD as needed throughout Project construction and operation.

Response No. D36-6

This comment also provides a conclusion to the commenter's letter, and no specific response is required.

Letter D37

Renee Acero

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Received on November 19, 2019

Response No. D37-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment expresses concern regarding the size of the proposed parking structure on the Project Site, stating the commenter's opinion that the height of the parking structure is excessive. The comment also asks the reasoning for the parking structure when the Project Site is in proximity to bike lanes in the Cities of South Gate and Downey as well as in proximity to the proposed Metro stops.

While the Draft EIR characterizes the size of the ISD/Probation Parking Structure and County Office Parking Structure as being up to 9 stories, the ultimate size of the parking structure will be determined by the final Project design. As described in Section 3.1, *Aesthetics*, of the Draft EIR, parking structures would be connected to the new buildings and the rest of the Project Site through landscaped streetscapes, interior courtyard spaces, and planting areas. This would create a unified Project Site. Additionally, as described on page 2-23 in Chapter 2, *Project Description*, of the Draft EIR, the ISD/Probation Parking Structure will have a landscape buffer on Flores Street between the building and the 10-foot sidewalk, which will result in a total of 22 feet between the buildings and the street. On Erickson Avenue, the ISD/Probation Parking Structure will be set back 25 feet from the street, including a 10-foot building setback, 7-foot sidewalk, and 8-foot landscape buffer. This would serve to reduce the visual massing of the ISD/Probation Parking Structure. Additionally, the Final EIR includes a modified alternative that addresses setbacks to nearby residences. In Alternative 4 Scenario 2, the ISD/Probation Parking Structure would be setback at least 118 feet from the eastern Project Site boundary to provide an increased distance between the new development and the nearby residential neighborhood east of the Project Site as compared to the Project. Please refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and corresponding aesthetic analysis.

As discussed in Section 3.11, *Transportation*, of the Draft EIR, the parking structure would provide a minimum of 2,167 spaces and would serve the ISD and Probation Department Headquarters buildings. The final number of parking spaces would be consistent with the County parking requirements as described in Part 11 (Vehicle Parking Space) of Chapter 22.52 (General Regulations) of the County's Code of Ordinances and is dependent on the ultimate building square footage, and staff counts.

Attachment A of this letter is provided as Comment Letter D36. Responses to this attachment are provided above the Responses to Comment Letter D36.

Letter D38

Mario Acero

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Received on November 21, 2019

Response No. D38-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

Responses to Comment for Letters D36 and D37 provide the responses to Letter D38 and are incorporated by reference into this response.

Letter D39

Wendy Gish

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Received on November 21, 2019

Response No. D39-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment expresses a desire for the retention and adaptive reuse of the existing historic buildings within the District similar to The Presidio in San Francisco rather than the demolition of structures that would occur under the proposed Project.

The proposed Project would retain four individually eligible historic buildings, structures, and features including LACO Nos. 1100 (Administration/Safety Police Building), 1238 (Casa Consuelo), 1301 (Water Tower), plus the Moreton Bay Fig Tree. In addition, the County considered a Full Preservation Alternative and two scenarios of a Rehabilitation Alternative, which are discussed in Chapter 4, *Alternatives*, of the Draft EIR. While these alternatives would have preserved more buildings on the Project Site as suggested by the commenter and would meet the spirit and intent of historic preservation, based on the Rancho Los Amigos Historic District Tier 1- 4 Feasibility Studies (2007-2009 Feasibility Studies) referenced therein, these alternatives were determined to be infeasible due to cost, susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures, and inability to meet the Project Objectives. Therefore, these alternatives were initially considered but rejected from further analysis.

Additionally, the Draft EIR evaluates three alternatives with varying levels of retention of the existing structures: Alternative 2, Partial Preservation Alternative (both scenarios); Alternative 3, Reduced Demolition Alternative; and Alternative 4, Adaptive Reuse/Reduced Project Alternative, including an additional scenario under Alternative 4 as revised in this Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). All include a scenario in which some of the buildings within the District are partially retained and mothballed and/or adaptively reused. Subsequent to the publication of the Draft EIR, the County recognized that more up-to-date information was necessary to determine whether the alternatives carried forward for analysis in the Draft EIR would be feasible today given considerations related to architectural and structural conditions, mothballing requirements, and cost. Therefore, the County commissioned a Focused Feasibility Study (2020 Feasibility Study) (Harlan et al., 2020) to address the current requirements and costs of rehabilitating and adaptively reusing historical resources for current County needs, as well as determining the costs for mothballing. The 2020 Feasibility Study is provided in Appendix L to this Final EIR. As documented in the 2020 Feasibility Study, comprehensive rehabilitation and adaptive reuse would require substantial and costly structural,

seismic, and architectural upgrades to bring the historic buildings into serviceable use as required for compliance with Building Codes, as well as seismic, ADA, and Title 24 requirements. Additionally, the majority of the buildings on the South Campus are not good candidates for reuse because of the lack of sufficient square footage and open floor plans.

Based upon information provided in the 2020 Feasibility Study, it was determined that a select group of additional historic structures are feasible for adaptive reuse and preservation. These structures were incorporated into Scenario 2 under Alternative 4 in the Final EIR (refer to Chapter 4, *Alternative 4 Scenario 2*, for full description and analysis). A total of six of 61 District Contributors would be retained either through adaptive reuse, restoration, mothballing, or retention under Alternative 4 Scenario 2. The County Board of Supervisors will consider each of the alternatives, along with information in the record including but not limited to the 2020 Feasibility Study, when making their final decision on Project approval.

Response No. D39-2

This comment suggests that California State Parks could be interested in purchasing the property from the County and restoring the property's buildings. The Draft EIR discussion in Section 2.2.2 of Chapter 2, *Project Description*, of the Draft EIR indicates the various concerns the County has considered in developing the Project as proposed. The Project Objectives outlined in Section 2.3 articulate the needs of the County for the South Campus. The County is seeking to reuse the property that they own as there is a shortage of available County-owned land with large number of parcels. The underlying purpose of the Project is to consolidate the County's existing ISD and Probation Headquarters, which are currently distributed over various locations for each individual department, into one location and maximize use of the underutilized County-owned Rancho Los Amigos South Campus. The existing County ISD and Probation Department Headquarters buildings are in poor physical condition and lack the capacity to expand to allow for further department consolidation into one location. In addition, as discussed above in Response to Comment No. D39-1, the County considered a Full Preservation Alternative as well as two scenarios of a Rehabilitation Alternative, which are discussed in in Chapter 4, *Alternatives*, of the Draft EIR. However, these alternatives were determined to be infeasible due to cost, and susceptibility to deterioration, intrusion and vandalism of mothballed and unoccupied structures. The South Campus is the last remaining available County-owned land that would allow for the construction of needed modernized County facilities. By allowing a long-term lease to private developers (as suggested by the commenter), the County would lose long-term control over this last available space for County use. The use of County-owned property such as the South Campus to develop needed new facilities also eliminates the need for the County to use tax dollars to acquire buildings or land for County facilities.

Response No. D39-3

This comment suggests that there are other properties in the County that could be used for the development of the proposed Project which would not require removal of historic buildings. Chapter 4, *Alternatives*, of the Draft EIR, provides a discussion regarding the consideration of offsite alternatives. As discussed therein, there are no other available County-owned land other

than the Rancho Los Amigos South Campus sufficient to house the ISD Headquarters, Probation Department Headquarters, and County Office facilities in a single area, consistent with the Project's purpose to consolidate the three facilities into one location. In addition, one of the Project Objectives is to avoid or minimize land acquisition, entitlement, and other siting costs by prioritizing the reuse of County-owned property. Furthermore, the Project as proposed would fulfill the spirit and intent of historic preservation through the proper care and treatment of the most important historical resources on the South Campus. For these reasons, an off-site alternative was considered and rejected as there is no off-site location available that can meet the basic Project Objectives and be feasibly constructed.

Response No. D39-4

This comment also provides a conclusion to the commenter's letter, and no specific response is required.

Letter D40

Sandra Perez

lachandy01@yahoo.com

Received on November 22, 2019

Response No. D40-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment serves as an introduction to the remainder of the letter. Detailed responses are provided in Responses to Comment Nos. D40-2 through D40-8.

Response No. D40-2

This comment requests that Erickson Street be closed after hours and on weekends, as it has been done in the past to help alleviate traffic in nearby neighborhoods.

The Project proposes Erickson Avenue provide the primary point of access to the Project Site and remain open 24-hours a day to accommodate the 24-hour operation of the ISD Headquarters. As stated on page 2-20 of the Draft EIR, "The ISD Headquarters would house a maximum of 2,450 employees who work in three general shift periods from 6:00 a.m. to 6:00 PM, 2:00 PM to 11:00 PM, and 8:00 PM to 6:00 AM. Most of the staff work within the 6:00 AM to 6:00 PM period."

The traffic analysis, provided in both Section 3.11, *Transportation*, of the Draft EIR, and in the Traffic Impact Study provided in Appendix H of the Draft EIR analyzes worst-case traffic impacts, which would occur during AM and PM peak hour conditions (7:00 AM to 9:00 AM and 4:00 PM to 6:00 PM, respectively). Therefore, the commenter's request to close Erickson Avenue after hours and on weekends would neither support the operation of the facility nor reduce significant traffic impacts during peak traffic hour conditions.

While the comment does not identify the specific neighborhood of concern, based on the remainder of the comment, the response assumes the commenter lives south of Gardendale Street. Tables 3.11-6 and 3.11-8 in the Draft EIR summarize the traffic analysis prepared for the Existing with Project and Future with Project conditions, respectively. Table 3.11-9 of the Draft EIR provides a summary of the intersections calculated to be significantly impacted by traffic (LOS) due to the Project after implementation of the identified mitigation measures, some of which are under the control of other agencies/jurisdictions. As shown in Table 3.11-9, four intersections along Gardendale Street are forecast to be significantly impacted by traffic due to the Project: Intersection No. 7 (Garfield Avenue / Monroe Avenue), Intersection No. 15 (Industrial Avenue / Gardendale Street), Intersection No. 16 (Erickson Avenue / Gardendale Street), Intersection No. 17 (Arizona Avenue / Gardendale Street), and Intersection No. 20 (Paramount Boulevard / Gardendale Street).

Potential mitigation measures to alleviate the significant traffic impacts at all of the affected intersections are described in the Draft EIR beginning on page 3.11-27. As described on page 3.11-29 of the Draft EIR, these intersections are outside the jurisdiction of the Lead Agency (the County of Los Angeles) as they are located in the cities of Downey, South Gate, and/or Paramount. For each mitigation measure identified in the Draft EIR, its implementation cannot be guaranteed. Therefore, each of the impacts at the affected intersections along Gardendale Street are considered in the Draft EIR to be significant and unavoidable.

The analysis of potential traffic impacts in the area south of Gardendale Street (the Hollydale area) is provided in the Draft EIR through analysis of Intersection No. 18 (Industrial Avenue-Arizona Avenue / Main Street), which is located in the center of Hollydale area. Impacts at Intersection No. 18 would be less than significant under Existing with Project and Future with Project conditions, as shown in Tables 3.11-6 and 3.11-8 of the Draft EIR. In addition, Intersection No. 9 (Garfield Avenue / Main Street), which is located just west of the Hollydale area, would also result in a less-than-significant impact under both conditions.

Response No. D40-3

This comment requests the County issue grant money to the City of South Gate to help with the traffic issues that would be caused by development of the proposed Project. It should be noted that the Project does propose two mitigation measures, MM-TRA-2 and MM-TRA-3, that would require the County to provide a fair-share contribution towards restriping the eastbound Imperial Highway approach to the Wright Road intersection to provide one additional through lane and towards the installation of a traffic signal at Erickson Avenue and Gardendale Street. However, as described in the Draft EIR (e.g., page 3.11-29), these intersections are outside the jurisdiction of the Lead Agency (the County) as they are located in the cities of Downey, South Gate, and/or Paramount, and therefore, the County cannot guarantee that those jurisdictions will agree with their implementation. If implemented, these improvements would be made by the City of South Gate and the City of Lynwood (for the Imperial Highway improvement proposed under Mitigation Measure MM-TRA-2) and the City of Downey and the City of South Gate (for the traffic signal improvement proposed under Mitigation Measure MM-TRA-3).

Response No. D40-4

This comment suggests that Consuelo Street become a four-lane street (two lanes in each direction) with a traffic signal at Paramount Boulevard that would provide access to the Project Site.

The Draft EIR indicated that the use of Consuelo Street is not desirable because there is an existing median at the Paramount Boulevard/Consuelo Street intersection that prohibits vehicles from turning left from Paramount Boulevard onto Consuelo Street, as shown in **Final EIR Figure 2-1**. This raised median requires northbound vehicles on Paramount Boulevard drive past Consuelo Street, complete a U-turn at the Puritan Street intersection, and proceed southbound on Paramount Boulevard to turn right at Consuelo Street. Further, for egress, a stop sign is provided on the eastbound Consuelo Street approach to its intersection with Paramount Boulevard, whereas the eastbound approach of Gardendale Street to the Paramount Boulevard intersection is controlled by a

traffic signal. A stop sign relies on motorists to determine sufficient gaps in opposing traffic to complete the turning movement, whereas a traffic signal provides a protected turning movement and, therefore, is generally a preferred route for Project-related vehicles. Finally, if the traffic analysis assumed that some Project-related trips would use Consuelo Street instead of Gardendale Street, it may have resulted in the understatement of the potential Project-related traffic impacts on Gardendale Street because individuals would more likely use the signal-controlled intersection of Gardendale Street / Paramount Boulevard as opposed to Consuelo Street.

Nevertheless, the Final EIR includes a Supplemental Traffic Analysis (provided in Appendix H-3 of this Final EIR) that considers that 15 percent of Project trips leaving the Project Site would use Consuelo Street and 5 percent of Project trips would enter the Project Site using Consuelo Street. As previously mentioned, a stop sign is provided on the eastbound Consuelo Street approach to its intersection with Paramount Boulevard.

As a result of this alternative trip assignment, the Supplemental Traffic Analysis evaluates potential traffic impacts at the Paramount Boulevard / Puritan Street and Paramount Boulevard / Consuelo Street-Cheyenne Street intersection. In addition, the Supplemental Traffic Analysis re-reviews the Paramount Boulevard / Gardendale Street intersection under this alternative assignment. Figure 1 of the Supplemental Traffic Analysis shows the alternative trip distribution and assignment under this scenario.

As shown in the Supplemental Traffic Analysis, the potential traffic impacts due to the Project would be less than significant based on the City of South Gate traffic analysis procedures and thresholds of significance at the Paramount Boulevard / Puritan Street and Paramount Boulevard / Consuelo Street-Cheyenne Street intersection. In addition, Project-related trips under the alternative assignment would continue to result in a less than significant impact at the Paramount Boulevard / Gardendale Street intersection under the City of South Gate traffic analysis procedures and thresholds of significance, which is consistent with the findings of the Traffic Impact Study contained in Appendix H of the Draft EIR. Because impacts would be less than significant, mitigation is not required and the comment's suggestions to include four travel lanes on Consuelo Street and install a traffic signal at the Paramount Boulevard/Consuelo Street intersection are not required.

Response No. D40-5

This comment expresses concern regarding the design of the proposed Project buildings in relation to the surrounding neighborhood. Section 3.1, *Aesthetics*, of the Draft EIR, analyzes the effects of the Project's impacts related to aesthetics. As stated on page 3.1-22, development of the Project would concentrate new buildings within the northern part of the Project Site in the Development Area. These buildings would replace the dilapidated buildings that currently exist on the Project Site and would provide new views and massing for the surrounding uses. The Project would include demolition of all but three existing buildings with historic visual elements and would introduce three new buildings (the ISD Headquarters and Probation Headquarters, which may potentially be connected into one building resulting in a total of two new buildings), as well as parking. The existing buildings to be retained would continue to be excellent samples

of the architectural style, design, workmanship, and integrity of location of the historic setting. The Project Site would transition from an entirely closed-off debilitated area into an open and accessible area with new buildings, parking availability, and accessible open space areas.

As discussed on page 3.1-23, the ultimate design of the buildings would be determined during the design phase; however, the intent is that these buildings would be designed to comply with the Secretary of Interior Standards and the County's Best Practices for Design Excellence. The new construction would be required to be compatible with the massing, size, scale, and architectural features of the adjacent historic resources, yet be differentiated from the old ensuring that the historic resource remains the focal point.

With regard to building heights, and as stated on page 3.1-23, the maximum buildings heights for the ISD Headquarters, Probation Headquarters, and County Office Building would be 90 feet (6 stories), 90 feet (6 stories), and 75 feet (5 stories), respectively, from ground level. These heights would continue to be taller than the existing mostly one- and two-story buildings in the surrounding community. Additionally, the new buildings would be of greater massing, with increased square footages from the current buildings. However, the massing would be more compatible with and a continuation of the surrounding offsite mixture of light industrial and other civic uses to the north and west of the Project Site, which are of larger scale and similar use as the proposed buildings. To the south, residential uses are separated by the southern portion of the South Campus and Gardendale Street. The nearest residential uses are located to the east of the Project Site, although there would be a landscaped setback of approximately 70 feet, providing separation between residential uses and the Project. In addition, the Final EIR includes Alternative 4 Scenario 2, which includes an additional setback of 48 feet, for a total setback of 118 feet from the proposed ISD/Probation Parking Structure to the adjacent residential neighborhood (refer to Chapter 4, *Alternative 4 Scenario 2*, of the Final EIR for full description and analysis).

Additionally, as stated on page 3.9-8 of Section 3.9, *Land Use and Planning*, of the Draft EIR, upon buildout, the Project would remove the majority of existing unoccupied structures that currently present a barrier to connectivity with the larger surrounding communities would be removed and replaced with open hydroseeded lots. Upon buildout of the Project, temporary fencing would be provided surrounding the Project Site, but the Development Area would not include fencing. The Development Area would be more open to the public and would allow for employees and visitors to travel through, which is presently not available. The proposed County uses on the northern part of the Project Site would allow for increased connectivity of the Project Site with the surrounding other County uses such as the adjacent Los Angeles County Public Health Laboratory and Downey Courthouse, as well as the Administration Building (LACO No. 1100) located within the Project Site (to remain). The removal of the fences and other barriers to the new buildings and open space areas that would be developed under the Project would allow for connectivity throughout the Project Site and into the surrounding Project vicinity. Additionally, the landscaping and open space areas would be open to the public and would serve as a connective fiber between the buildings throughout the Project Site. The open spaces, landscape corridors, and perimeter streetscapes would encourage pedestrian movement that would optimize human interaction and connect the larger Project Site. These connections would be carried throughout the Project Site.

Response No. D40-6

This comment expresses concern regarding police protection services and suggests the addition of a substation to help with traffic and parking issues related to the proposed Project. Chapter 5, *Other CEQA Considerations*, provides an analysis of the proposed Project's impacts to the Los Angeles County Sheriff's Department (LASD) County Services Bureau (CSB). As discussed therein, the CSB currently provides security to the Project Site on a 24-hour basis, with one deputy and one security officer assigned to each shift (day, night, and early mornings) seven days a week. While CSB notes that law enforcement service requirements for the South Campus would increase upon Project buildout, it is likely that after construction, the addition of new buildings and security features will decrease the amount of CSB security needed across the Project Site. Additionally, the inclusion of security fencing and cameras during construction would likely reduce the potential for vandalism and burglaries at the Project Site during Project construction. However, the County will continue to coordinate security measures with LASD as needed throughout Project construction and operation. Adding police protection facilities, such as a substation, is not necessary because construction or operation of the proposed Project would not impact CSB's police protection services.

Response No. D40-7

This comment expresses concern regarding related projects in the vicinity of the Project Site and provides a list of related projects that need to be taken into consideration in the EIR. Table 2-8, Cumulative Projects in the Vicinity of the Project Site, included in Chapter 2, *Project Description*, of the Draft EIR provides a list of the related projects that were considered in the cumulative analyses included in the Draft EIR. As discussed in Chapter 2, *Project Description*, this list is not intended to be an exhaustive list of projects in the region, but represents those projects in the vicinity of the Project Site that may have some related environmental impact to the proposed Project and are: (1) recently completed, (2) currently under construction or implementation or beginning construction or implementation, (3) proposed and under environmental review, or (4) reasonably foreseeable, i.e., projects for which an application has been submitted and reasonably foreseeable public projects. The PATH 60-unit homeless facility on Imperial Highway and Garfield Boulevard is included in Table 2-8 as Cumulative Project No. 32; the Metro stations at Industrial Avenue and Gardendale Street and at Century Boulevard and Center Street are encompassed as part of the larger West Santa Ana Branch Transit Corridor, included in Table 2-8 as Cumulative Project No. 1; the 244-unit apartment complex at Imperial Highway and Garfield is included in Table 2-8 as Cumulative Project No. 31; and the Downey sports complex is included in Table 2-8 as Cumulative Project No. 4. The projects the commenter mentions are already included in the cumulative analysis provided in the Draft EIR; thus, no changes to the EIR need to be made.

With regard to the 100-unit homeless facility on Gardendale Street and Garfield Avenue, at the time of the release of the Notice of Preparation (NOP) for the proposed Project, the Request for Proposals had not been released for the potential development of the 100-unit homeless facility. The County entered into an Exclusive Negotiation Agreement with Abode Communities and PATH Ventures on September 24, 2019, just two weeks before release of this Draft EIR, to

discuss the potential terms of the development of a 100-unit affordable housing project on the County-owned Former American Legion Site property located at 11269 Garfield Avenue in the City of Downey (City of South Gate, 2019).

The American Legion Project would generate limited vehicle trips because the site is relatively small (2.2 acres). Further, development at the site is relatively limited, consisting of 100 affordable housing units. The American Legion project, located approximately one mile from the Project Site, would be forecast to generate approximately 52 AM peak hour trips and 38 PM peak hour trips. When compared to the total forecast of vehicle trips for the cumulative projects provided in Table 6-1 of the Traffic Impact Study (470 total AM peak hour trips and 748 total PM peak hour trips), the American Legion project would increase the total AM peak hour trips by 11 percent and the total PM peak hour trips by 5 percent. The City of Downey did not identify this project as reasonably foreseeable future project when asked by the County in September 2017 when the Draft EIR was being prepared. Further, when contacted again by Linscott, Law, & Greenspan (LLG) in February 2019 to inquire about any updates to the list of related projects, the City of Downey nor the City of South Gate provided any additional information. However, if this site is ultimately developed, any vehicle trips that may be experienced at the study intersections would be captured within the use of the annual ambient growth factor applied to the existing traffic counts. As described on page 32 of the Traffic Impact Study, as well as on page 3.11-14 of Section 3.11, *Transportation*, of the Draft EIR, the inclusion of the ambient traffic factor is intended to account for potential future traffic growth related to development projects not identified in the list of cumulative projects.

Response No. D40-8

The comment refers to “failing” intersections but does not identify which specific intersections the commenter states will affect her and her neighbors’ quality of life. This response assumes the commenter refers to study intersections calculated to operate at Level of Service F (LOS F) in the Draft EIR. Table 3.11-6 in the Draft EIR lists the calculated Levels of Service (including LOS F) at the study intersections for Existing and Existing with Project conditions during the AM and PM peak hours. Similarly, Table 3.11-8 in the Draft EIR lists the calculated Levels of Service (including LOS F) at the study intersections for Future and Future with Project conditions during the AM and PM peak hours. The comment does not identify a specific concern or flaw with respect to the traffic analysis provided in the Draft EIR; therefore, a more specific response cannot be provided. However, while the comment does not identify the specific neighborhood of concern, based on the commenter’s other concern raised about intersections along Gardendale Street, it is assumed that the commenter lives south of Gardendale Street. In response to potential concerns regarding the neighborhood south of Gardendale Street, refer to Response to Comments No. D40-2, which is provided on the first two pages of this letter, for a discussion of the traffic impact analysis relative to intersections near the Hollydale neighborhood.

This comment also provides a conclusion to the commenter’s letter, and no specific response is required.

Letter D41

Ron & Jennifer Boren
7915 Lyndora Street
Downey, CA 90242
Letter dated November 25, 2019

Response No. D41-1

The County thanks you for submitting written comments on the Draft EIR. The County has prepared written responses to all comments on environmental issues. All comments received, and the County's responses to each comment, will be provided to the Los Angeles County Board of Supervisors as part of the Final EIR when considering approval of the Project.

This comment expresses opposition to the proposed Project, characterizes the Project as unsustainable, and states the proposed Project is out of character with the surrounding area and neighborhoods. Subsection 2.4.3, *Architecture and Design*, of Chapter 2, *Project Description*, of the Draft EIR, indicates that materials used for the proposed Project would be selected based on durability, minimal maintenance, aesthetic longevity, sustainability, color retention, structural integrity, and ease of upkeep and replacement. In addition, the Project would be designed to obtain a LEED Gold level of certification under the most current version of the Leadership in Energy and Environmental Design (LEEDv4) program, or the equivalent, which would serve to further the sustainability of the proposed Project. Thus, the Project would be designed to be modern, efficient, and sustainable pursuant to the County's Best Practices for Design Excellence.

The comment also expresses opposition to the proposed Project because it would be out of character with the surrounding area and neighborhoods. Section 3.1, *Aesthetics*, of the Draft EIR, analyzes the effects of the Project's impacts related to aesthetics and visual character. As discussed therein, the building heights would vary with the maximum building heights for the ISD Headquarters and Probation Headquarters being 90 feet (6 stories), and for the County Office Building 75 feet (5 stories) from ground level. The parking structures would be 90 feet (9 stories) and 36 feet (3 stories) from ground level. While the new buildings would be taller than the existing on-site buildings, which are mostly one- and two-story buildings, the massing would be compatible with and a continuation of the surrounding off-site mixture of light industrial and other civic uses which are of larger scale and similar use as the proposed buildings. The new construction of the on-site structures are required to be compatible with the massing, size, scale, and architectural features of the adjacent historic resources, yet be differentiated from the old to ensure the historic buildings remain the visual focal point. While the scale and massing of some of the new construction would be greater than adjacent historic buildings, setbacks and step-backs, as well as flat roofs with parapets set back from building façades would be used to visually minimize the perceived height of the buildings. Materials used for the Project would be selected based on durability, minimal maintenance, aesthetic longevity, sustainability, color retention, structural integrity, and ease of upkeep and replacement. In addition, the new buildings would provide visual variety to the Project Site. The Project would include open space comprising of hardscape and landscape to surround the buildings and to link the buildings within the larger

Project Site. In addition, the existing courtyards and open space areas would be updated. The Project would also enhance and improve the roadways and pedestrian environment while maintaining a view of the remaining historic buildings on the Project Site. Although the visual character of the Project Site would change as a result of the proposed Project, implementation of Mitigation Measures MM-CUL-1b and CUL-1c would not substantially degrade the existing visual character or quality of the site and its surroundings as the visual character would be preserved through the new buildings and/or interpretive program on the Project Site.

Response No. D41-2

This comment is similar to Comment No. D41-1 and expresses opposition to the proposed Project because the commenter considers the Project unsustainable and out of character with the surrounding area and neighborhoods. Refer to Response to Comment No. D41-1 for a discussion regarding the proposed Project's sustainable characteristics as well as the proposed Project's compatibility with the surrounding area.

Response No. D41-3

This comment expresses concern regarding the number of employees and the related traffic generated by the proposed Project. Section 3.11, *Transportation*, of the Draft EIR, provides an analysis of potential traffic impacts that would result from the proposed Project based on the Traffic Impact Study that was prepared and provided in Appendix H of the Draft EIR. The Traffic Impact Study evaluated 27 intersections, which are shown on Figure 3.11-1. The intersection of Paramount Boulevard and Imperial Highway was evaluated as Intersection No. 19 in the Traffic Impact Study. In terms of existing level of service (LOS), as shown in Table 3.11-3, 23 of the study intersections, including Intersection No. 19, currently operate at LOS D or better while the following three intersections operate at LOS E or LOS F during one or both evaluated peak hours:

- Intersection No. 3 - Wright Road/Imperial Highway, LOS F (AM), LOS E (PM);
- Intersection No. 7 - Garfield Avenue/Monroe Avenue, LOS E (AM); and
- Intersection No. 15 - Industrial Avenue/Gardendale Street, LOS E (AM).

As indicated in Section 3.11, the proposed Project is expected to generate 1,038 vehicle trips (913 inbound trips and 125 outbound trips) during the AM peak hour and 884 vehicle trips (150 inbound trips and 734 outbound trips) during the PM peak hour. In order to provide a conservative analysis, no reductions were made to the trip generation estimates related to potential trips that may be made by public transit, bicycling or other modes in lieu of the private automobile.

Based on the Traffic Impact Study, the Project would result in significant intersection impacts in both the Existing with Project and Future with Project traffic scenarios at the following intersections:

- Stop-Controlled Intersection Impacts
 - Intersection No. 7 – Garfield Avenue/Monroe Avenue (AM/PM);

- Intersection No. 15 – Industrial Avenue/Gardendale Street (AM);
- Intersection No. 16 – Erickson Avenue/Gardendale Street (AM/PM); and
- Intersection No. 17 – Arizona Avenue/Gardendale Street (AM). [Future Plus Project Scenario only]
- Signalized Intersection Impacts
 - Intersection No. 3 – Wright Road/Imperial Highway (AM);
 - Intersection No. 20 – Paramount Boulevard/Gardendale Street (AM/PM).

There are no feasible mitigation measures that could be implemented to reduce the significant traffic impacts for Intersection Nos. 7, 15, 17, and 20. However, the Draft EIR does include implementation of Mitigation Measures MM-TRA-2 and MM-TRA-3, which would reduce significant traffic impacts at Intersection Nos. 3, Wright Road/Imperial Highway, and 16, Erickson Avenue/Gardendale Street, to less than significant, respectively. Mitigation Measure MM-TRA-2 would require the County to provide a fair-share contribution towards restriping the eastbound Imperial Highway approach to the Wright Road intersection. Mitigation Measure MM-TRA-3 would require the County to provide a fair-share contribution towards the installation of a traffic signal at the Erickson Avenue/Gardendale Street intersection. However, as these intersections are within other jurisdictions, specifically the City of South Gate and Lynwood for Intersection No. 3, Wright Road/Imperial Highway and the City of Downey and the City of South Gate for Intersection No. 16, Erickson Avenue/Gardendale Street, the County cannot guarantee that those jurisdictions will agree with implementation of the mitigation measures. Therefore, the Draft EIR concludes the impacts to the above listed intersections would be significant and unavoidable.

Response No. D41-4

This comment states that the nine-story parking garage would be out of character for the surrounding area. The ultimate size of the parking structure will be determined by the final Project design. As described in Section 3.1, *Aesthetics*, of the Draft EIR, parking structures would be connected to the new buildings and the rest of the Project Site through landscaped streetscapes, interior courtyard spaces, and planting areas. This would create a unified Project Site. Additionally, as described on page 2-23 in Chapter 2, *Project Description*, of the Draft EIR, the ISD/Probation Parking Structure will have a landscape buffer on Flores Street between the building and the 10-foot sidewalk, which will result in a total of 22 feet between the buildings and the street. On Erickson Avenue, the ISD/Probation Parking Structure will be set back 25 feet from the street, including a 10-foot building setback, 7-foot sidewalk, and 8-foot landscape buffer. This would serve to reduce the visual massing of the ISD/Probation Parking Structure. Refer to Response to Comment No. D41-1 for additional discussion regarding the proposed Project's compatibility with the surrounding area.

Response No. D41-5

This comment expresses a desire for more open space to be provided on the Project Site, including walking/biking trails, a community garden, and general open space for the community

to enjoy. Currently, the Project Site is not accessible to the general public since it is surrounded by 8-foot chain link fencing. In addition, the Project Site contains deteriorated buildings that are mostly vacant. In its current condition, surrounding communities do not have access to or through the Project Site.

As discussed in Subsection 2.4.4, *Open Space and Landscaping*, of Chapter 2, *Project Description*, of the Draft EIR, the proposed open space and landscaping would include gardens and improved streetscapes within the South Campus. The Project Site would transition from an entirely closed-off debilitated area into an open and accessible area with new buildings, parking availability, and accessible open space areas. Open space, as described further in Subsection 2.4.4, *Open Space and Landscaping*, in Chapter 2, *Project Description*, of the Draft EIR, would comprise of hardscape and landscape to surround the buildings and link the buildings within the larger Project Site. The existing courtyards and open space areas would be updated to create decorative plazas and elements such as seating, tables, and gates to allow for pedestrian walkways and private meeting areas. The removal of the fences and other barriers to the new buildings and open space areas, as discussed above, that would be developed under the Project would allow for connectivity throughout the Project Site and into the surrounding Project vicinity. Additionally, the landscaping and open space areas would be open to the public and would serve as a connective fiber between the buildings throughout the Project Site. The open spaces, landscape corridors, and perimeter streetscapes would encourage pedestrian movement that would optimize human interaction and connect the larger Project Site. Civic use redevelopment projects, such as the proposed Project, typically improve connectivity throughout a community. Therefore, residents from the nearby neighborhoods could walk, jog and bike through the Project Site and would have access to the open space areas. However, while community gardens have not been contemplated as part of the Project, this suggestion will be forwarded to the Los Angeles County Board of Supervisors as part of the Final EIR for the Board's review and consideration.

Response No. D41-6

This comment expresses concern regarding soccer games as they are often noisy and add light pollution. Although it is not explicitly stated, the commenter may be referring to the soccer uses proposed within the Rancho Los Amigos South Campus Sports Center proposed within proximity to the Project Site. The Sports Center project is a separate project, but is evaluated in the Draft EIR's cumulative impact analysis, page 3.1-14 of the Draft EIR considers the fact that it will contain nighttime sports lighting when completed. Potential light and glare as well as noise resulting from the proposed County uses on the Project Site are evaluated in the Sections 3.1, *Aesthetics*, and 3.10, *Noise*, of the Draft EIR.

Response No. D41-7

This comment also provides a conclusion to the commenter's letter, and no specific response is required.

CHAPTER 3

Revisions, Clarifications, and Corrections to the Draft EIR

In accordance with the CEQA Guidelines Section 15132 (a), this Chapter of the Final EIR provides changes to the Draft EIR that have been made to clarify, correct, or supplement the information provided in that document. These changes and additions are due to recognition of inadvertent errors or omissions, and to respond to comments received on the Draft EIR during the public review period. The changes described in this Chapter do not add significant new information to the Draft EIR that would require recirculation of the Draft EIR. More specifically, CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5), but before the EIR is certified. Section 15088.5 of the CEQA Guidelines specifically states: “New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. ‘Significant new information’ requiring recirculation includes, for example, a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.”

CEQA Guidelines Section 15088.5 also provides that “[re]circulation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR... A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.”

As demonstrated in this Final EIR, the changes presented in this Chapter do not constitute new significant information warranting recirculation of the Draft EIR as set forth in CEQA

Guidelines Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA.

Changes to the Draft EIR are indicated below under the respective EIR section heading, page number, and paragraph. Paragraph reference is to the first full paragraph on the page. Deletions are shown with ~~strike through~~ and additions are shown with double underline.

Chapter 1, Introduction

1. Page ES-8, after the third row of the table on this page, the following row is added:

<u>Impact BIO-6: The proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. (No Impact)</u>	<u>No mitigation needed.</u>	<u>N/A</u>
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2. Page ES-8, row five of the table on this page, the row is revised as follows:

Impact CUL-1: The proposed Project would cause a substantial adverse change in the significance of a historic architectural resource qualifying as a historical resource as defined in Section 15064.5. (Project construction would be Significant and Unavoidable, Project operation would be Less than Significant with Mitigation)	MM-CUL-1a, MM-CUL-1b, MM-CUL-1c, MM-CUL-1d, MM-CUL-1e, MM-CUL-1f	Project construction would be Significant and Unavoidable, Project operation would be Less than Significant
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3. Page ES-8, row thirteen of the table on this page, the row is revised as follows:

Impact GHG-1: The proposed Project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. (Significant and Unavoidable)	MM-AIR-1, MM-AIR-2, MM-AIR-3, MM-AIR-4, MM-AIR-5	Significant and Unavoidable
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4. Page ES-10, row eight and nine of the table on this page, the rows are revised as follows:

Impact NOI-1: The proposed Project would generate a substantial temporary <u>and</u> permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies during on-site construction activities or during Project operations. (Project construction would be Less than Significant with Mitigation, Project operation would be Less than Significant with Mitigation)	MM-NOI-1, MM-NOI-2, MM-NOI-3, MM-NOI-4, MM-NOI-5, MM-NOI-6	Project construction would be Less than Significant, Project operation would be Less than Significant
Impact NOI-2: The proposed Project would result in the generation of excessive groundborne vibration or groundborne noise levels. (Project construction would be Significant and Unavoidable, Project operation would be No Impact)	MM-NOI-6, MM-NOI-7, MM-NOI-8, MM-NOI-9	Project construction would be Significant and Unavoidable, Project operation would be No Impact

- Page ES-10, add new row after row ten of the table as follows:

<u>Cumulative Noise and Vibration Impacts</u>	<u>MM-NOI-10, MM-NOI-11 (cumulative construction noise)</u>	<u>Cumulative construction noise would be Significant and Unavoidable. Cumulative groundborne vibration would be Less than Significant. Cumulative operational noise would be less than significant</u>
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- Page ES-10, row twelve of this table on this page, the row is revised as follows:

Impact TRA-1: The proposed Project would conflict with a project plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. (Project construction would be Less than Significant with Mitigation; Project operation would be Significant and Unavoidable)	<u>MM-TRA-1 (construction only), MM-TRA-2, MM-TRA-3 (operation only)</u>	Project construction would be Less than Significant, Project operation would be Significant and Unavoidable
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Chapter 2, Project Description

- Page 2-15, the first paragraph is revised as follows:

As previously mentioned, the Project Site... In recent years, the Project Site has been subject to reoccurring incidents of arson, vandalism, theft, and vagrant occupation. Most recently, fires were set at various buildings throughout the Project Site in February 2017 (LACO No. 307/308), June 2017 (LACO No. 1101 and 1287), ~~and~~ July 2017 (LACO No. 1262 and 7704), and July 2019 (LACO No. 1267), and October 2019 (LACO No. 1194).

- Page 2-15, the second paragraph is revised as follows:

The ~~unsecured~~ unoccupied, boarded up, and locked buildings in their current condition present a public safety concern. Nearly all of the buildings within the Project Site have been determined to be in poor structural condition. The buildings would require moderate to very complex seismic retrofit and extensive structural upgrades to be brought up to current building code standards. In addition, nearly all of the buildings contain some amount of hazardous materials, including asbestos-containing materials (ACMs), lead-based paint (LBP), and polychlorinated biphenyls (PCBs). These environmental hazards are located within the buildings but have also extended to the external parts of the buildings (decayed building materials), and pose a potential public and environmental health and safety concern. In addition, one open soil and groundwater contamination case has been filed with the Los Angeles Regional Water Quality Control Board

(LARWQCB), which is the result of a prior leaking underground storage tank (UST) that has since been removed. The contamination is located below and around LACO No. 1276 on the western part of the Project Site (**Figure 2-5**). In addition, many of the buildings have been subject to vandalism, water damage, arson-related fire and general exposure.

3. Page 2-18, bullet 8 and 9 in the list of objectives are revised as follows (consistent with the list of project objectives already provided on page 4-4 to 4-5 of the Draft EIR):
 - Provide proximity to other surrounding County facilities, provide an attractive, uncluttered visible gateway to the South Campus from Imperial Highway, and establish a common character and tone for the South Campus.
 - Enable the South Campus to complement and readily adapt to potential future projects in immediate proximity to the South Campus.
4. Page 2-25, the last two full paragraphs on the page, are revised as follows:

Internal Access

A secured Level 1 (ground floor) public entrance to the Project Site would be provided from Golondrinas Street, which is currently gated and does not allow for regular vehicle access. A dedicated entrance from the secured parking area to the ISD and Probation Department Headquarters buildings would also be provided. Off-campus visitors would arrive on campus through the new ISD/Probation Parking Structure...

External Access

With respect to external access, 55 percent of Project-related vehicle trips would utilize Erickson Avenue for access to/from Gardendale Street via Intersection No. 16 (Erickson Avenue / Gardendale Street) to the south of the Project site, and 45 percent of Project-related vehicles trips would utilize Erickson Avenue to travel to/from Imperial Highway to the north of the Project Site.

5. Page 2-26, the second to last paragraph is revised as follows:

A minimum of six percent of the required parking spaces would be designated as electric vehicle charging stations for ~~both the surface parking and~~ the parking garages. Eight percent of the required parking spaces shall be assigned to low emitting, fuel efficient, carpool/van pool vehicles.

6. Page 2-45, the last paragraph is revised as follows:

The sports center will be constructed by the County and leased to the City of Downey who will operate and maintain it. Construction of the Sports Center is anticipated to begin in ~~2020~~²⁰¹⁹, and would overlap with construction of the proposed Project.

Chapter 3, Environmental Analysis

Section 3.1, Aesthetics

1. Page 3.1-21, the last sentence in the subsection entitled Visual Character is revised as follows:

Given the ~~78~~ 74-acre size of the Project Site and ~~it's~~ its secured fenced nature, public views, particularly of interior parts of the Project Site, are not readily available to sensitive receptors.

Section 3.2, Air Quality

1. Page 3.2-28, the second paragraph is revised as follows:

Mobile source emissions are estimated based on the predicted number of trips to and from the Project Site determined by the Traffic Impact Study (TIA) (LLG, 2019) (Appendix ~~I~~ H), trip lengths from CalEEMod default data, and emission factors from EMFAC2014. The TIA accounts for trip generation for Project buildout of 3,000 employees.

2. Page 3.2-39, Mitigation Measure MM-AIR-1 is revised as follows:

Mitigation Measure AIR-1: Coating Requirements. The County shall use coatings that comply with South Coast Air-Quality Management District's (SCAQMD) Rule 1113, as applicable. The project will strive to utilize material which is pre-primed or pre-painted. Additionally, the County shall limit daily application of architectural coatings applied onsite to 155 gallons per day during construction with an average of 50 grams volatile organic compounds (VOC) per liter of coating, less water and less exempt compounds, or equivalent usage resulting in similar or less VOC emissions. The County shall provide to the SCAQMD a comprehensive inventory of all coating material that will be used during any of the construction phases.

3. Page 3.2-39, Mitigation Measure MM-AIR-2 is revised as follows:

Mitigation Measure AIR-2 (MM-AIR-2): Equipment Emissions Standards. The County shall ~~implement~~ utilize construction equipment with features ensuring emissions standards for equipment operating at the Project Site. The County shall ~~include~~ require these features within applicable request for bid proposal documents and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features ~~will~~ shall include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards for equipment rated at 50 horsepower (hp) or greater during Project construction. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of

equipment. The County shall provide the SCAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used during any of the construction phases.

- The County shall use alternative-fueled generators ~~shall be used~~ when commercial models that have the power supply requirements to meet the construction needs of the Project are commercially available from local suppliers/vendors. The determination of commercial availability of such equipment will be made by the County prior to issuance of grading or building permits based on County-provided evidence of the availability or unavailability of alternative-fueled generators and/or evidence obtained by the County from expert sources such as construction contractors in the region.

4. Page 3.2-40, Mitigation Measure MM-AIR-4 is revised as follows:

Mitigation Measure AIR-4 (MM-AIR-4): Emergency Generators. The County shall select all new standby generators proposed from the South Coast Air-Quality Management District's certified generators list and meet the USEPA Tier 4 standard for diesel emissions. For after-treatment of engine exhaust air, the County shall provide diesel particulate filters to meet the emission level requirements of the South Coast Air Quality Management District. The Project would have four generators and would need to be tested monthly to ensure reliability in the case of a power outage. The County shall be responsible for the coordination of maintenance schedules.

Section 3.3, Biological Resources

1. Page 3.3-19, Mitigation Measure MM-BIO-1 is revised as follows:

Mitigation Measure MM-BIO-1 (MM-BIO-1): Maternity Bat Roosts. Impacts to maternity bat roosts will be avoided through implementation of the following measures:

- Additional focused roosting surveys shall be conducted throughout the entire Project Site by a qualified biologist to determine if bat species are presently using the structures on-site for roosting. The survey will focus on the buildings with the highest potential of supporting roosting bats, those with large enough openings for bats to enter and exit, and it will be conducted at dusk when bats would be exiting their roosts. Exit counts will be conducted so that no visible light shines on the roost area or openings. Noise and other disturbance ~~must~~ shall be minimized or eliminated, so that bats will emerge normally from roosts.
- If evidence of maternity bat roosts ~~are~~ is established within the Project Site, the biologist shall recommend exclusionary devices or removal efforts, as necessary based on specific species and situational criteria. Exclusionary devices shall not be installed at the entrance to the roosts between April and August, during which time the immature bats are unable to leave the roost. Exclusion devices, if needed, will be installed in late August, after completion of the maternity season.
- If it is determined by the bat biologist that there is a substantial population of bats using the structures within the Project Site, the construction of bat houses on-site may be recommended by the qualified biologist and in consultation with the California Department of Fish and Wildlife (CDFW) ~~with CDFW~~. The houses would be constructed prior to any exclusionary actions and would be based upon

CDFW-approved designs. If determined necessary by CDFW, post-construction monitoring shall occur seasonally (four times/year) for up to three years, or until the mitigation can be considered successful. Success ~~would~~ shall be defined as the existence of the same number of mitigation roost or roosts being occupied by comparable numbers of bats belonging to the same species as were present pre-construction, prior to construction activities, as specified in the initial roosting surveys.

2. Page 3.3-18, the third bullet of Mitigation Measure MM-BIO-3 is revised as follows:

Mitigation Measure MM-BIO-3 (MM-BIO-3): Oak Tree Impacts. Prior to construction or implementation of the proposed Project, the County will be notified for any encroachment or removal of coast live oak in the Development Area or any other portion of the Rancho Los Amigos South Campus. Although an oak tree permit is not required due to County exemption, conditions to mitigate for impacts to oak trees will include the following:

- For any oaks that shall be retained within the Project Site, chain link fencing shall be installed around the protected zone of the trees (five feet beyond the dripline, the outermost extent of the tree's branches, or 15 feet from the trunk, whichever is greater). The fencing will remain in place throughout the entire period of development. Any excavation or grading allowed within the protected zone will be limited to hand tools or small hand-power equipment (e.g., handheld equipment such as an auger, hand drill, or reciprocating saw).

Section 3.4, Cultural Resources

1. Page 3.4-14, the first sentence of the first paragraph is revised as follows:

A full description and evaluation of the District is provided in Appendix # D-1, and the following presents a summary of this information.

2. Page 3.4-41, the third full paragraph is revised as follows:

Implementation of Mitigation Measures MM-CUL-1a, ~~and~~ CUL-1b, and CUL-1e would reduce the impact to the Moreton Bay Fig Tree's eligibility under County Landmark Criterion 7 caused by the removal of the surrounding neighborhood (the District). Mitigation Measure MM-CUL-1a requires Historic American Landscape Survey (HALS) Standard Format documentation of the District's contributing landscape, including the Moreton Bay Fig Tree, ⁷ which is a District contributor. Mitigation Measure MM-CUL-1b requires implementation of an interpretive and commemorative program (program) documenting the historical significance of Rancho Los Amigos and the Los Angeles County Poor Farm. The program would feature a variety of informational programming that may include an on-site interpretation program, artifacts, documentary film, and/or commemorative plaques to educate the public on the importance of the site. Mitigation Measure MM-CUL-1e requires that a Qualified Preservation Professional be retained to develop a plan of action for avoidance and protection of the retained Moreton Bay Fig Tree. Both Mitigation Measures CUL-1a and CUL-1b will document Moreton Bay Fig

Tree's setting and association with Rancho Los Amigos and educate the public about the site's history and Mitigation Measure MM-CUL-1e will require avoidance and protection of the Moreton Bay Fig Tree, thereby reducing the impact on the Moreton Bay Fig Tree's eligibility to a less than significant level.

3. Page 3.4-41, Mitigation Measure MM-CUL-1b is revised as follows:

Mitigation Measure MM-CUL-1b (MM-CUL-1b): Interpretive and Commemorative Program. The County shall retain a Qualified Preservation Professional to develop and implement a ~~publically~~ publicly accessible interpretive and commemorative program (Program), in consultation with the County, that captures and incorporates the important cultural history, associations, and significance of the Rancho Los Amigos Historic District for the public benefit, such that the cultural importance of the Los Angeles County Poor Farm and Rancho Los Amigos is retained for future generations. The Program's requirements shall be outlined in a technical memorandum, including the requirements for maintenance and operation of the program's elements that may include but not be limited to an on- or off-site exhibit, commemorative marker, oral history, video, or other ~~publically~~ publicly accessible media.

4. Page 3.4-43, Mitigation MM-CUL-1c is revised as follows:

Mitigation Measure MM-CUL-1c (MM-CUL-1c): Salvage Plan and Inventory Report. Prior to the start of demolition, the County shall retain a Qualified Preservation Professional to prepare a Salvage Plan and Inventory Report outlining salvageable materials and reuse or disposal options. The Qualified Preservation Professional shall conduct an inventory of the 57 District contributors' key character-defining physical features (e.g., decorative features, window elements, shingling, etc.) appropriate for salvage and interpretation. The Salvage Plan and Inventory Report shall include retention of LACO No. 1301 (Water Tower) for inclusion in the interpretive program. Unsound, decayed, or toxic materials (e.g. asbestos, lead paint, etc.) need not be included in the salvage plan. Once salvageable materials are identified, the Qualified Preservation Professional shall monitor their collection by the County's construction contractor(s) to ensure the items are appropriately salvaged and are not damaged during removal. Salvage of materials can occur prior to the start of demolition, or concurrently with demolition, as feasible. Salvaged materials shall be stored onsite either in existing structures, or in an offsite storage facility, to limit exposure to the elements (rain/sun) ~~and;~~ the possibility of vandalism, and theft.

Salvaged materials shall first be made available for use in the interpretive program to be developed under Mitigation Measure MM-CUL-1b or for use in any potential future restoration/rehabilitation projects on the Project Site. Salvaged materials that are not re-used onsite or in the interpretative program shall be offered for donation to local historical societies, preservation organizations, or the like, for curatorial and/or educational purposes, or to the general public for reuse in rehabilitation of historic structures. Salvaged materials offered for donation shall be advertised for a period of not less than 30 days on the County's website and in historic preservation websites, such as Preservationdirectory.com and Oldhouseonline.com, and the Los Angeles Times, as well as by posting on the Project Site itself and by other means as deemed appropriate by the Qualified Preservation Professional.

5. Page 3.4-43, Mitigation Measure MM-CUL-1d is revised as follows:

Mitigation Measure MM-CUL-1d (MM-CUL-1d): Mothballing Plan. The County shall retain a Qualified Preservation Professional to prepare and implement a Mothballing Plan for Individually Eligible, Primary Contributors and/or Secondary Contributors in the District that are selected to be mothballed. ~~LACO No. 1283 (Casa Consuelo) and LACO No. 1301 (Water Tower).~~ The Mothballing Plan shall outline the proposed mothballing process in compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and consistent with National Park Service Preservation Brief No. 31, Mothballing Historic Buildings.

6. Page 3.4-44, Mitigation Measure MM-CUL-1e is revised as follows:

Mitigation Measure CUL-1e (MM-CUL-1e): Avoidance and Protection of Retained Historic Resources During Construction. Prior to the start of construction, a Qualified Preservation Professional shall be retained to develop a plan of action for avoidance, ~~and~~ protection, and preservation of the retained historic resources in conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings by Kay D. Weeks and Anne E. Grimmer (U.S. Department of the Interior, National Park Service, 1995, revised by Anne E. Grimmer, 2017), including the buildings/structures that would continue in use or be adaptively reused or mothballed, ~~(LACO No. 1100 [Administration Building], LACO No. 1238 [Casa Consuelo], LACO No. 1301 [Water Tower], and the Moreton Bay Fig Tree),~~ in coordination with the County. The Qualified Preservation Professional shall consult with a qualified arborist in identification and implementation of protective measures for the Moreton Bay Fig Tree. The plan shall include at a minimum:

1. Notation of the building/structure/feature on construction plans.
2. Pre-construction survey to document the existing physical condition of the building/structure/feature.
3. The County shall retain a Qualified Preservation Professional, who meets the Secretary of the Interior's Professional Qualifications Requirements in Architectural History and/or Historic Architecture and has a minimum of 10 years of experience in reviewing projects for conformance with the Standards. The Qualified Preservation Professional shall review the 50% and 90% construction plans for selected buildings/structures to be restored or adaptively reused for conformance with the Secretary of the Interior's Standards (Weeks & Grimmer, 2017) and prepare a plan review report for each selected building/structure that shall document conformance with Standards and provide appropriate preservation recommendations to ensure Standards conformance for submittal to the County prior to issuance of a demolition/alteration permit for affected buildings/structures.
4. ~~3.~~ Procedures and timing for the placement and removal of a protective barrier(s), such as protective wood boards, bracing or framing to protect fragile fenestration and other exposed architecture features and materials, protective fencing and/or concrete or water-filled plastic K-rails around each retained building/structure/feature.

5. ~~4.~~ Monitoring of the installation and removal of protective barriers by th3 Qualified Preservation Professional, or his or her designee.
 6. ~~5.~~ Monitoring of the condition of the building/structure/feature at regular intervals during the duration of demolition and construction including vibration monitoring as defined in Mitigation Measure NOI-3 and visual inspections by a qualified Preservation Professional.
 7. ~~6.~~ Monitoring of the condition of the Moreton Bay Fig Tree by a qualified arborist at regular intervals during the duration of demolition and construction and implementation of any necessary care to protect the health of the tree by the County.
 8. For any buildings/structures selected to be restored or adaptively reused, the retained Qualified Preservation Professional (see number 3) shall conduct construction monitoring at regular intervals during demolition and construction and provide preservation treatment recommendations as needed to address unforeseen discoveries or construction changes or any other issues that may arise that may affect historic materials, features, or finishes, in order to ensure the work is completed in conformance with the Standards. The Qualified Preservation Professional shall document each monitoring visit in a monitoring report to the County.
 9. ~~7.~~ Post-construction survey to document the condition of the building/structure/feature after completion of the Project.
 10. ~~8.~~ Preparation of a technical memorandum documenting the pre-construction and post-construction conditions of ~~LACO No. 1100, LACO No. 1238, LACO No. 130~~ retained historical built environment resources and the Moreton Bay Fig Tree and compliance with protective measures outlined in this mitigation measure.
 11. For any buildings/structures selected to be restored or adaptively reused, the retained Qualified Preservation Professional (see number 3) shall document overall project conformance with the Standards in a final completion report to the County that shall summarize how preservation treatment specifications included on the construction plans were implemented in conformance with the Standards, and furthermore, how unforeseen discoveries or construction changes were resolved and implemented in conformance with the Standards.
7. Page 4.3-47, Mitigation Measure MM-CUL-2a is revised as follows:

Mitigation Measure MM-CUL-2a (MM-CUL-2a): Retention of A g Qualified Archaeologist. Prior to start of any ground-disturbing activities (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the County shall retain a Qualified Archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for archaeology (U.S. Department of the Interior, 2008) to oversee and ensure all mitigation related to archaeological resources (Mitigation Measures MM-CUL-2b, -2c, and -2d) is carried out.

8. Page 3.4-47, Mitigation Measure MM-CUL-2c is revised as follows:

Mitigation Measure MM-CUL-2c (MM-CUL-2c): Cultural Resources Monitoring and Mitigation Program (CRMMP) Prior to the start of any ground-disturbing activity (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the Qualified Archaeologist shall prepare a Cultural Resources Mitigation and Monitoring Program (CRMMP) based on the final County-approved Project design plans. The CRMMP shall include:

1. Provisions for Archaeological Monitoring. Full-time archaeological monitoring shall be required for all ground disturbance related to construction of the proposed Project and demolition of other South Campus structures up to a depth of 5 feet (depth at which archaeological sensitivity decreases). The CRMMP shall outline the archaeological monitor(s) responsibilities and requirements (see Mitigation Measure MM-CUL-2d).
2. Procedures for Discovery of Archaeological Resources. Procedures to be implemented in the event of an archaeological discovery shall be fully defined in the CRMMP, including stop-work and protective measures, notification protocols, procedures for significance assessments, and appropriate treatment measures. The CRMMP shall state that avoidance or preservation in place is the preferred manner of mitigating impacts to historical resources and unique archaeological resources, but shall provide procedures to follow should the County determine that avoidance is infeasible in light of factors such as the nature of the find, project design, costs, and other considerations. See also Mitigation Measure MM-CUL-2f.

If, based on the recommendation of the Qualified Archaeologist, it is determined that the discovered archaeological resource constitutes a historical resource or unique archaeological resource pursuant to CEQA, avoidance and preservation in place shall be the preferred manner of mitigating impacts to such a resource pursuant to CEQA Guidelines section 15126.4. Preservation in place maintains the important relationship between artifacts and their archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement.

In the event that preservation in place is determined by the County to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Data Recovery and Treatment Plan shall be prepared and implemented by the Qualified Archaeologist in coordination with the County that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The County shall consult with appropriate Native American representatives in determining treatment of resources that are Native American in origin to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered. The CRMMP will include the following procedures and requirements related to Native American resources:

3. Procedures for Discovery of Human Remains and Associated Funerary Objects. The CRMMP shall outline the protocols and procedures to be followed in the event that human remains and associated funerary objects are encountered during construction. These shall include stop-work and protective measures, notification protocols, and compliance with California Health and Safety Code Section 7050.5 and Public Resources Code ~~PRC~~ Section 5097.98. See also Mitigation Measure MM-CUL-4.

9. Page 3.4-51, Mitigation Measure MM-CUL-3a is revised as follows:

Mitigation Measure MM-CUL-3a (MM-CUL-3a): Retention of a Qualified Paleontologist. Prior to start of any ground-disturbing activities (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the County shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) standards (SVP, 2010). The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting and Project progress meetings on a regular basis, and shall report to the Project Site in the event potential paleontological resources are encountered. See MM-CUL-3c.

10. Page 3.4-52, Mitigation Measure MM-CUL-4 is revised as follows:

Mitigation Measure MM-CUL-4 (MM-CUL-4): Unanticipated Discovery of Human Remains and Associated Funerary Objects. In the event human remains and associated funerary objects are encountered during construction of the proposed Project or demolition of other South Campus structures, all activity in the vicinity of the find shall cease (within 100 feet), and the protocols and procedures in the CRMMP shall be implemented (see Mitigation Measure MM-CUL-2c). Human remains discoveries shall be treated in accordance with ~~and the~~ California Health and Safety Code Section 7050.5 and ~~PRC~~ Public Resources Code Section 5097.98, requiring assessment of the discovery by the County Coroner, assignment of a Most Likely Descendant by the NAHC, and consultation between the Most Likely Descendant and the County (landowner) regarding treatment of the discovery.

Section 3.6, Greenhouse Gas Emissions

1. Page 3.6-34, the last paragraph is revised as follows:

As presented in Table 3.6-5, the Project would exceed the SCAQMD screening level threshold of 3,000 MTCO₂e/year. Because GHG emissions are considered cumulative in nature, the project would result in GHG emissions that are cumulatively considerable due to Impact GHG-1. As discussed in the project-level evaluation, MM-AIR-1 and MM-AIR-3 through MM-AIR-5 would reduce impacts from GHG emissions, but impacts would remain significant and thus cumulatively considerable even after mitigation.

Section 3.7, Hazards and Hazardous Materials

1. Page 3.7-27, the last bullet of Mitigation Measure MM-HAZ-1 is revised as follows:
 - Procedures to be followed in the event that evidence of potential soil or groundwater contamination (such as soil staining, noxious odors, debris or buried storage containers) is encountered. These procedures shall be in accordance with hazardous waste operations regulations and specifically include, but are not limited to, the following: immediately stopping work in the vicinity of the unknown hazardous materials release, notifying Downey Fire Department Hazardous Materials Section and/or the Los Angeles Regional Water Quality Control Board (LARWQCB) ~~LARWQCB~~, as appropriate, and retaining a qualified environmental firm to perform sampling and remediation.

Section 3.8, Hydrology and Water Quality

1. Page 3.8-27, the fourth sentence in the first paragraph under Impact HYDRO-5 is revised as follows:

In addition, the Project would be required to comply with all applicable requirements in the Drainage Concept as grading permit regulations set forth in the City of Downey SP 88-IA, which require obtaining the necessary construction and connection permits from the County measures, and the preparation of grading plans as well as hydrology and hydraulics analyses necessary to obtain the permits. ~~and I~~ Inspections would occur during construction to ensure that to control runoff from the construction site ~~which~~ would not exceed the capacity of stormwater drainage systems.

Section 3.9, Land Use and Planning

1. Page 3.9-12, the last paragraph is revised as follows:

The implementation of the proposed Project is consistent with the applicable policies, plans, regulations, and land use designations set forth by the County ~~and the City~~. Any other cumulative...

Section 3.10, Noise

1. Page 3.10-26, Impact NOI-1 is revised as follows:

Impact NOI-1: The proposed Project would generate a substantial temporary and permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies during on-site construction activities or during Project operations.

2. Page 3.10-29, the second to last paragraph is revised follows:

Implementation of Mitigation Measures MM-~~NOI-5~~ and NOI-6 requires standard noise control devices for all stationary equipment and prohibits locating such equipment within 110 feet of the property line.

Section 3.11, Transportation

1. Page 3.11-2, the second full paragraph is revised as follows:

The Intersection Capacity Utilization (ICU) method was used to determine Volume-to-Capacity (v/c) ratios and corresponding Levels of Service (LOS) for the signalized study intersections located within the City of Downey, City of South Gate, City of Paramount, and the County of Los Angeles. For purposes of this traffic impact study, the terms “ICU” and “v/c ratio” are used interchangeably. The Highway Capacity Manual (HCM) method was used to determine Control Delays and corresponding LOS for the unsignalized study intersections.

2. Page 3.11-5, Table 3.11-3 is revised as follows:

12.	Old River School Road /	Downey /	AM	0.883	D
	Imperial Highway	<u>South Gate</u>	PM	0.789	C

3. Page 3.11-13, the first paragraph is revised as follows:

PM peak hours, as well as on a daily basis, were estimated using rates published in the Institute of Transportation Engineers’ (ITE) Trip Generation Manual, 10th Edition, for ITE Land Use Code 710 (General Office Building). The General Office Building category includes office uses, as well as tenant services, such as restaurant or cafeteria and service retail facilities, and conference spaces. As presented in **Table 3.11-5**, the proposed Project is expected to generate 1,038 vehicle trips (913 inbound trips and 125 outbound trips) during the AM peak hour and 884 vehicle trips (150 inbound trips and 734 outbound trips) during the PM peak hour.

4. Pages 3.11-14, last paragraph, is revised as follows:

The related projects research was based on information on file at the County of Los Angeles Department of Regional Planning, City of Downey Community Development Department, City of South Gate Community Development Department, and the City of Lynwood Building, Safety and Planning Division...The trip generation, distribution, and assignment for the related projects were estimated using the same methodology described above for the proposed Project. For purposes of this analysis, the terms “distribution” and “assignment” are used interchangeably.

5. Page 3.11-15, first full paragraph is revised follows:

Also, construction of the proposed Project is not expected to result in the loss of any street parking or require the temporary closure of any existing sidewalks. As required by Mitigation Measure MM-TRA-1, The the County would prepare a work site traffic control plan prior to the start of construction. That plan would show the location of any warning signs and access to abutting properties.

6. Page 3.11-15, the second to last bullet of Mitigation Measure MM-TRA-1 is revised as follows:

- Coordinate Consultation with the City of Downey and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residence.

7. Page 3.11-15, the last paragraph on the page is revised as follows:

However, despite the lower trip generation, construction activities could still cause delay and unsafe conditions for vehicles, pedestrians, and bicyclists in the vicinity of the Project Site. Impacts to a project plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities could ~~would~~ be potentially significant during construction and demolition activities;- however, MM-TRA-1 requires implementation of a Construction Traffic Management Plan, which would, in relevant part, provide pedestrian and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways; implement safety precautions for pedestrians and bicyclists, schedule construction-related deliveries and haul trips to occur outside commuter peak hours; and ensure adequate emergency access. With implementation of MM-TRA-1 construction-related impacts would be reduced to a less-than-significant level.

8. Page 3.11-21, the first paragraph is revised as follows:

As shown in the table, 22 of the study intersections ~~currently~~ operate at LOS D or better under Future Cumulative without Project Conditions, while the following five intersections operate at LOS E or LOS F during one or both evaluated peak hours:

9. Page 3.11-22, Table 3.11-8, is revised as follows:

**TABLE 3.11-8
FUTURE CUMULATIVE WITH PROJECT CONDITIONS INTERSECTION LEVELS OF SERVICE**

No.	Intersection	Peak Hour	Future <u>Cumulative Without Project Baseline Conditions</u>		Future <u>Cumulative with Project Conditions</u>		Change in V/C	Significant Impact
			Delay or V/C	LOS	Delay or V/C	LOS		

10. Page 3.11-30, the third paragraph is revised as follows:

~~Although Project C construction of the proposed Project, which would include demolition of existing buildings on the Project Site, would not alter the configuration (alignment) of external area roadways, and impacts would be significant~~ impacts could result from incompatible uses on roadways with construction equipment.

11. Page 3.11-31, the fourth paragraph is revised as follows:

All Project roadways and driveways would be designed to comply with ~~LADOT~~ County of Los Angeles standards. The driveways would not require the removal or relocation of existing transit stops, and would be designed and configured to avoid potential conflicts with transit services and pedestrian traffic.

Section 3.12, Tribal Cultural Resources

1. Page 3.13-3, 3.13-5, and 3.13-7, the page numbers are revised as follows:

Page 3.~~13~~12-3, Page 3.~~13~~12-5, Page 3.~~13~~12-7

Section 3.13, Utilities and Service Systems

1. Page 3.13-2, the second to last paragraph is revised as follows:

In addition to providing wastewater conveyance services...The JWPCP treats approximately ~~260~~ 261.1 million gallons of wastewater per day (mgd) (LACSD, 2017).

2. Page 3.13-2, the last paragraph is revised as follows:

Wastewater generated by the proposed Project...The JWPCP currently processes an average flow of ~~260~~ 261.1 mgd. JWPCP has the capacity to treat up to 675 mgd of primary, and secondary, ~~and tertiary~~ wastewater. The Project would conservatively generate 0.164 mgd of wastewater, or approximately ~~0.024~~ 0.041 percent of JWPCP's dry weather capacity of ~~675~~ 400 mgd of primary, secondary, ~~and tertiary~~ wastewater and ~~0.064~~ 0.063 percent of JWPCP's current average flow.

3. Page 3.13-16, the full paragraph under Impact UTL-3 is revised as follows:

Wastewater generated by the proposed Project would be treated at the JWPCP. As previously stated under Impact UTL-1, the Project would conservatively generate 0.164 mgd of wastewater, or approximately ~~0.024~~ 0.041 percent of JWPCP's dry weather capacity of ~~675 mgd of primary, secondary, and tertiary~~ 400 mgd of wastewater and ~~0.064~~ 0.063 percent of JWPCP's current average flow. The JWPCP treats approximately ~~260~~ 261.1 million gallons per day (mgd) (LACSD, 2017).

Chapter 4, Alternatives

The following specific changes to Chapter 4, *Alternatives*, were made to the Draft EIR. In addition, a new scenario entitled Alternative 4 Scenario 2 is included in the Final EIR. Revisions specific to this new scenario can be found in Chapter 4, *Alternative 4 Scenario 2*, of this Final EIR. Table 4-7 provided on pages 4-74 through 4-79 of the Draft EIR have been further expanded and clarified to show the comparative conclusions for Alternative 2, Partial Preservation Alternative, and additional revisions. Furthermore, the table has been expanded to include the comparative conclusions for the new Alternative 4 Scenario 2. This table has been provided in as part of Chapter 4, *Alternative 4 Scenario 2*, of this Final EIR as **Table 4-11** with deletions shown as ~~struck through~~ and additions shown as double underline.

1. Page 4-30, the second full paragraph is revised as follows:

Initially, the main approach to the property was from the east along Consuelo Street until Imperial Highway was established to the north in 1931. After 1931, the main approach to the South Campus was from the north along Erickson Avenue. Potential impacts to the setting caused by the new construction would be further reduced through compliance with the Secretary of Interior's Standards 9 and 10, by the implementation of mitigation measure MM-CUL-1f, which requires a plan review of the Project ensuring the new construction to ensure it is compatible with the District and its remaining Contributors.

2. Page 4-45, the first full paragraph is revised as follows:

~~Impacts caused to the setting of the District by the introduction of new construction would also be reduced with the application of Mitigation Measure MM-CUL-1f, to ensure that new construction would be compatible with the remaining surrounding District setting and Individually Eligible buildings.~~

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CHAPTER 4

Alternative 4 Scenario 2

Based on comments received on the Draft EIR during the environmental review process, particularly concerns regarding historical resources, as well as additional efforts undertaken by the County to develop up-to-date information about the feasibility of rehabilitating and reusing existing buildings and structures on the Project Site, the County developed a new Scenario 2 to Alternative 4: Adaptive Reuse/Reduced Project Alternative. This chapter shows those changes that have been made to a portion to Chapter 4, *Alternatives*, of the Draft EIR in ~~striketrough~~ text for deletions and double underline text for additions that have been made regarding this new scenario, and therefore begins at Section 4.6, Summary of Project Alternatives, from the Draft EIR.

4.6 Summary of Project Alternatives

This chapter considers a total of six (6) alternatives to the Project, two of which were considered but were not selected for further analysis, and the remaining four of which, including the “no project” alternative and three other “build” alternatives, are comprehensively evaluated below. The two alternatives that were considered but rejected after initial analysis include an alternative off-site location and alternative on-site uses; these are described below in Section 4.7.

Under the No Project Alternative, the Project would not be developed and the conditions of the South Campus would continue as under current conditions. Three additional alternatives were selected, with the goal of identifying ways to reduce or avoid significant unavoidable impacts that would result from implementation of the Project, including: Aesthetics - shade and shadow impacts; Air Quality - cumulatively considerable net increase of NO_x emissions during Project operations; Historical Resources – a historic architectural resource due to the demolition of structures within the District during Project construction; Greenhouse Gas (GHG) Emissions – generation of GHG emissions that would exceed the South Coast Air Quality Management District interim screening-level threshold during Project operation; Noise – groundborne vibration impacts during Project construction, cumulative noise and vibration impacts during Project construction; and Traffic – operational traffic impacts under the “Existing with Project” and “Future with Project” traffic scenarios (Intersection nos. 3, 7, 15, 16, 17, and 20) with the exception of the impact at Intersection No. 17 (Arizona Avenue/Gardendale Street), which would only occur in the “future plus Project” scenario. Based on these significant unavoidable environmental impacts and the objectives established for the Project (set forth above), the following alternatives are evaluated:

1. No Project Alternative
2. Partial Preservation Alternative

3. Reduced Demolition Alternative
4. Adaptive Reuse/Reduced Project Alternative

These four alternatives consider varying levels of demolition and reconfigurations of the proposed new County facilities on the Project Site in order to accomplish a reduction in significant impacts.

As indicated in this Draft EIR (Section 3.4, *Cultural Resources*), a total of 105 buildings would be demolished as part of the Project including 57 Contributors to the District. This would result in significant and unavoidable impacts to the District even after the implementation of mitigation measures. As stated within Section 3.4, *Cultural Resources*, the majority of the Project Site lies within the District. Surveys conducted in 2017 document the District as containing 109 buildings, structures, and features. Out of the 109 buildings, structures and features surveyed, 61 were identified as Contributors to the District and 48 were identified as Non-Contributors (see Table 2-1 in Chapter 2, *Project Description*, and Appendix D-1). The 61 Contributors include a total of 59 buildings and structures, as well as a Moreton Bay Fig Tree and the Rancho Los Amigos Site Plan (Site Plan). Of the 61 total District Contributors, 23 are Primary Contributors including the Moreton Bay Fig Tree, the Site Plan, and LACO Nos. 1100, 1205, 1207, 1184, 1185, 1186, 1203, 1260, 1189, 1190, 1191, 1192, 1187, 1238, 1261, 1262, 1263, 1275, 1300, 1301, and 1302. Of these Primary Contributors, six (6) are also individually eligible historical resources (Moreton Bay Fig Tree and LACO Nos. 1265, 1100, 1238, 1300, 1301, and 1302). Of the remaining contributing resources, 17 are Secondary Contributors (buildings), and 21 are Tertiary Contributors (buildings).

The No Project Alternative (Alternative 1), as required by CEQA, is described below and would retain the District in its entirety and avoid any new construction or demolition.

The Partial Preservation Alternative (Alternative 2) includes two scenarios that would minimize the extent of demolition that would occur on the Project Site and the location of the new proposed County facilities ~~in order to maintain the eligibility of the District to the National Register~~. Under Scenario 1, all 23 Primary (including the 6 Individual Resources) and all 17 Secondary Contributors would be retained and mothballed¹, for a total of 40 of 61 District Contributors to be retained (65 percent). Scenario 1 would maintain the eligibility of the District to the National Register. No buildings or structures would be adaptively reused. Under Scenario 2, all 23 Primary Contributors would be retained and mothballed but not the 17 Secondary Contributors, for a total of 23 of 61 District Contributors to be retained (37 percent). No buildings or structures would be adaptively reused. Although the historic associations of the District that convey its significance would still be embodied by the individual resources and the Primary Contributors, the overall

¹ Mothballing is a process of closing up vacant historic buildings temporarily to protect them from weather and vandalism. Mothballing is an effective means of preserving historic buildings until a longer-term productive use for a building has been determined. It requires stabilization of the exterior, properly designed security protection, generally some form of interior ventilation—either through mechanical or natural air exchange systems—and continued maintenance and surveillance monitoring. Comprehensive mothballing programs are generally expensive and may cost 10 percent or more of a modest rehabilitation budget (U.S. Department of the Interior, National Park Service, 1993).

District context would be materially impaired, and Scenario 2 would not maintain the eligibility of the District to the National Register.

The Reduced Demolition Alternative (Alternative 3) also minimizes the extent of demolition that would occur on the Project Site and would limit removal of historic buildings in the District while supporting the proposed County uses. Eleven (11) Primary Contributors (including the Moreton Bay Fig Tree) and five (5) Secondary Contributors that exemplify and convey the significance of the District would be retained and mothballed, while 24 other Primary and Secondary Contributors would be demolished. A total of 16 of 61 District Contributors would be retained (26 percent).

The Adaptive Reuse/Reduced Project (Alternative 4) includes two scenarios that would locate a portion of the County uses into ~~12~~ selected Primary and Secondary Contributors that potentially may feasibly accommodate the change in use. Under Scenario 1, 12 selected Primary and Secondary Contributors and would be adaptively reused with no new building construction, while ~~all~~ the remaining 28 Primary and Secondary Contributors would be mothballed, for a total of 40 District Contributors to be retained (65 percent). Under Scenario 2, two selected Primary Individually Eligible Contributors would be adaptively reused; two additional Primary Individually Eligible Contributors (one building and one landscape feature) would be retained; one Primary Individually Eligible Contributor would be restored; and one Primary Individually Eligible Contributor would be mothballed for future County use. A total of six District Contributors would be retained (10 percent).

Under Alternatives 2, 3 and 4, all 21 Tertiary Contributors and 48 Non-Contributors would be demolished. **Table 4-1** shows a summary comparison of the four alternatives.

**TABLE 4-1
COMPARISON OF FEATURES FOR THE PROJECT ALTERNATIVES**

Existing Historic District	Project	Alternatives			
		Alternative 1: No Project	Alternative 2: Partial Preservation	Alternative 3: Reduced Demolition	Alternative 4: Adaptive Reuse/Reduced Project
Total of 109 features on the Project Site, including 61 Contributors to the District (23 Primary Contributors, 17 Secondary Contributors, 21 Tertiary Contributors) and 48 Non-Contributors	Retain 3 individually eligible buildings and 1 individually eligible landscape feature (which are also Primary Contributors to the District) Demolish 105 buildings and structures	No change from existing conditions	Scenario 1: Retain all 23 Primary Contributors and 17 Secondary Contributors Scenario 2: Retain all 23 Primary Contributors and demolish 17 Secondary Contributors Both Scenarios: Demolish all Tertiary Contributors (21) and Non-Contributors (48)	Retain 11 Primary Contributors and 5 Secondary Contributors <u>Mothball 16 remaining Primary and Secondary Contributors</u> Demolish 12 Primary Contributors, and 12 Secondary Contributors, and all Mothball 16 remaining Primary and Secondary Contributors Demolish all Tertiary Contributors (21) and Non-Contributors (48)	<u>Scenario 1:</u> Adaptively reuse selected Primary and Secondary Contributors (12 candidate buildings identified) Mothball all 28 remaining Primary and Secondary Contributors Demolish all Tertiary Contributors (21) and Non-Contributors (48) <u>Scenario 2:</u> <u>Adaptively reuse selected Primary Individually Eligible Contributors (2 candidate buildings identified)</u> <u>Retain 2 Primary Individually Eligible Contributors (1 building and 1 landscape feature)</u> <u>Retain and Restore the 1 Primary Individually Eligible Contributor</u> <u>Mothball 1 Primary Individually Eligible Contributor</u> <u>Demolish remaining 103 buildings, structures, and features (48 Non-Contributors, 21 Tertiary Contributors, 17 Secondary Contributors, and 17 Primary Contributors)</u>

4.8 Alternatives to the Proposed Project

4.8.4 Adaptive Reuse/Reduced Project Alternative

Description of the Alternative

The Adaptive Reuse/Reduced Project Alternative (Alternative 4) would ~~minimize~~ reduce impacts to the District by reducing demolition and ~~avoiding construction of any new buildings~~ within the Project Site, while still allowing for some (but not all) of the new County uses. Significant impacts on the District would be reduced by two potential scenarios in this alternative. In both scenarios, all Non-Contributors (48 buildings) and Tertiary Contributors (21 buildings) would be demolished.

Scenario 1

In the first scenario, ~~A~~ a portion of the proposed County uses would be relocated into existing Individually Eligible buildings and select Primary Contributors within the District, which would be adaptively reused (including being brought up to current seismic codes) for this purpose. No construction of new buildings would occur in this scenario. The amount of County uses relocating to the Project Site would be less than under the Project (based on available square footage within the District) and therefore operational impacts of the Project would also be reduced.

~~Demolition would be limited to Tertiary Contributors (21 buildings) and Non-Contributors (48 buildings) on the Project Site, while a~~ Under Scenario 1, all Primary and Secondary Contributors would either be adaptively reused for County purposes or mothballed, for a total of 40 District Contributors to be retained (65 percent). In contrast to the other alternatives and the proposed Project, repurposing the 12 selected buildings for County uses would require a substantial and very costly construction effort in order to bring the existing historic buildings into a condition that would be safe and suitable for reuse. Buildings identified for adaptive reuse are those that meet the following criteria, which were identified in order to maximize County uses while minimizing impacts to historic buildings: (1) are Individually Eligible or Primary Contributors; (2) have substantial available square footage; (3) consider the existing County employee locations as defined in Table 2-2 of the Project Description; and (4) are located in proximity to each other. As an example of such adaptive reuse, LACO No. 1238 (Casa Consuelo) could be considered for use as County administrative offices, a café or cafeteria, child care center, or cultural resources interpretive center for the Rancho Los Amigos campus.

Based on defined Los Angeles County Space Standards for County uses, each County employee would occupy approximately 200 gross square feet (Gensler, 2015). With the combined square footage of the buildings listed below, approximately ~~357,562~~ 190,240 square feet would be adaptively reused.

As shown in **Table 4-3** ~~4~~ and **Figure 4-4**, the following twelve buildings have been identified as potential candidates for adaptive reuse to house County uses: LACO Nos. 1184, 1185, 1186, 1187, 1188, 1238, 1260, 1261, 1262, 1263, 1300, and 1302.² These buildings are all Primary Contributors (with the exception of LACO No. 1188, a Secondary Contributor) and some are also Individually Eligible buildings, and are mostly two-story structures (excluding LACO Nos. 1300 and 1302) with potentially available floor space and locations in general proximity to each other (excluding LACO No. 1238). As these buildings are located in the approximate area that would be remediated under the Project, it is assumed that under this Alternative, soil remediation, which would be completed under the proposed Project, would not be attempted.

² LACO No. 1100 is not considered in this analysis as it already houses existing County uses.

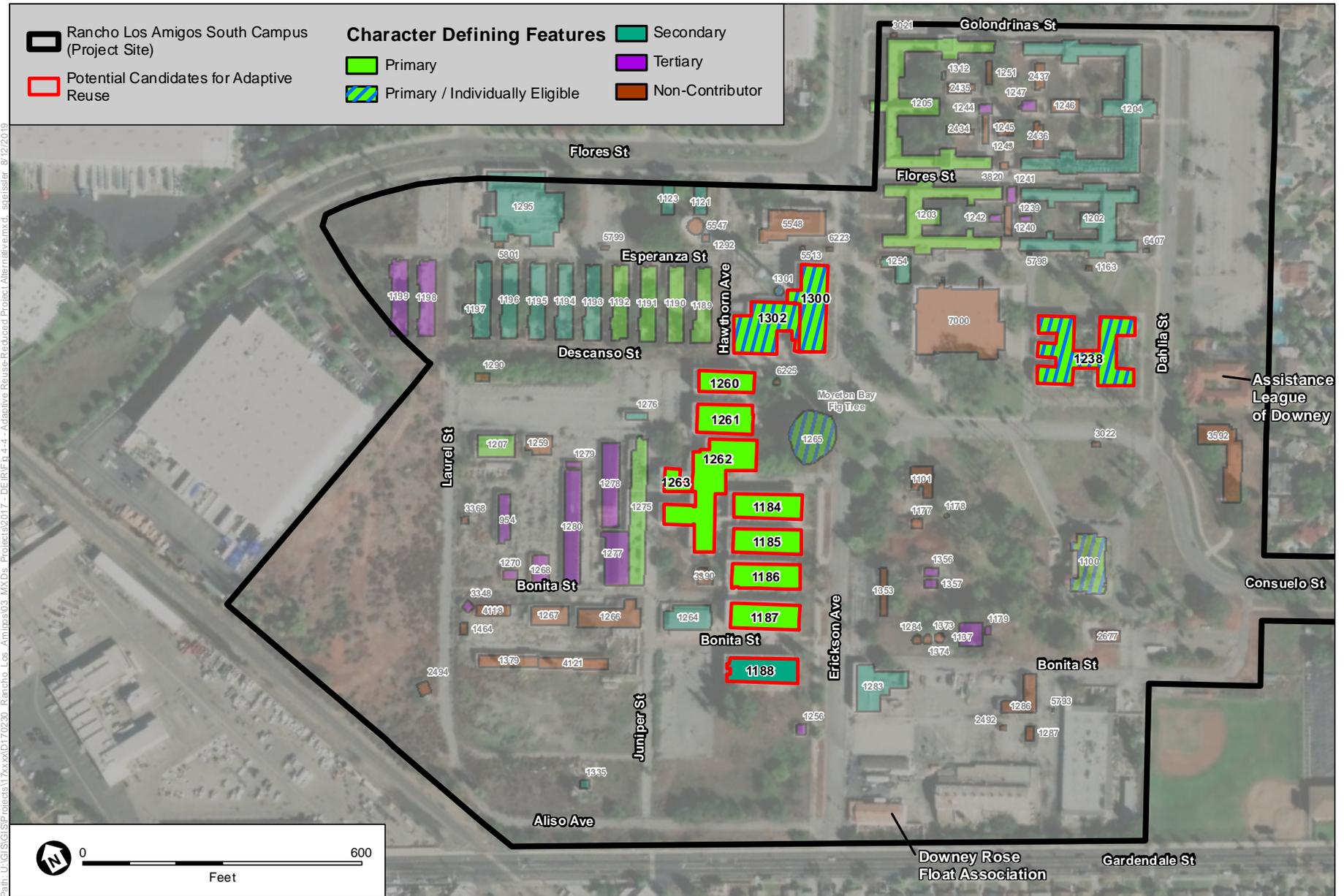
TABLE 4-34
POTENTIAL CANDIDATES FOR BUILDINGS TO BE ADAPTIVELY REUSED AND RETAINED UNDER ALTERNATIVE 4 SCENARIO 1

LACO. Building Number	Approximate Square Footage ^a	Ranking
1184	14,500	Primary
1185	14,924	Primary
1186	14,924	Primary
1187	14,500	Primary
1188	14,644	Secondary
1238	37,808	Primary/Individually Eligible
1260	10,148	Primary
1261	8,700	Primary
1262	33,090	Primary
1263	4,089	Primary
1300	10,175	Primary/Individually Eligible
1302	12,738	Primary/Individually Eligible
Total Building Pad Usable Square Footage	190,240	
Total Usable Square Footage^b	357,562	

Notes:

^a Square footage data is for building pads only.

^b All listed buildings (except for LACO No. 1300 and 1302) are two-story. Therefore, the approximate square footage will be adjusted to determine the total amount of square footage available for use.



SOURCE: DigitalGlobe, 2016 (Aerial), ESA, 2019.

Rancho Los Amigos South Campus
Final Environmental Impact Report
Final EIR Figure 4-4

Adaptive Reuse/Reduced Project Alternative Scenario 1



As noted in Chapter 2, *Project Description*, of this Draft EIR, the County-owned property at 9150 E. Imperial Highway, which houses 1,580 ~~ISD staff~~ (688 ISD staff) and 892 Probation Department (~~892 staff~~), ~~staff who would be relocated~~, is structurally inadequate and has reached the end of its useful life. The 892 Probation Department staff would be relocated to the Project Site under Scenario 1. The remaining ISD staff at that location would be moved to other existing County offices in the area. Additionally, the staff located at the two more distant locations for ~~both~~ the Probation Department (31 staff at 7639 S. Painter Avenue, Whittier and 10 staff at 1299 W. Artesia Boulevard, Artesia) and ~~ISD (30 staff at 12750 Center Court Drive, Cerritos)~~ would be relocated to the Project Site. As summarized in **Table 4-45**, a total of approximately ~~1,654~~ 933 staff would be relocated from their existing worksites to the Project Site. All other staff that would have been moved under the proposed Project would remain in the existing offices. Based on the Los Angeles County Space Standards of allocating approximately 200 gross square feet per employee, approximately ~~330,200~~ 186,600 gross square feet of space would be needed to house these relocated staff. The ~~357,562~~ 190,240 square feet available in the proposed buildings on the Project Site under this the Adaptive Reuse/Reduced Project Alternative Scenario 1 have sufficient space to house these relocated staff.

TABLE 4-45
ADAPTIVE REUSE/REDUCED PROJECT ALTERNATIVE - AFFECTED LOS ANGELES COUNTY DEPARTMENTS

Department Name	Number of Staff to be Relocated
Probation Department	
9150 E. Imperial Highway, Downey	688
7639 S. Painter Avenue, Whittier	31
1299 W. Artesia Boulevard, Suite 120, Artesia	10
ISD	
9150 E. Imperial Highway, Downey	892
12750 Center Court Drive, Cerritos	30
Total Number of Staff to be Relocated	1,654 <u>933</u>
Approximate Square Footage Required	330,200 <u>186,600</u> gross square feet
SOURCE: County of Los Angeles Department of Public Works, 2018.	

Scenario 2

In Scenario 2, a portion of the proposed County uses would be relocated into selected existing Individually Eligible buildings within the District which would be adaptively reused, in addition to the new construction proposed under the Project. As shown in Table 4-6 and Figure 4-5, two individually eligible buildings would be adaptively reused to include various components of the proposed County uses: (1) LACO No. 1238 (Casa Consuelo) and (2) LACO No. 1300 (Power Plant). LACO No. 1100 (Administration Building) would, similar to existing conditions, be retained and occupied by the Los Angeles County Sheriff's Department (LASD) Professional Standards Division. LACO No. 1301 (Water Tower), an individually eligible structure, would be restored, repainted, and seismically upgraded. While the Water Tower would not be operational upon restoration, the Water Tower would remain on the Project Site and continue to serve as a

focal point for the South Campus. LACO No. 1302 (Shop & Laundry), an individually eligible primary contributor, would be mothballed for future County use (no funding or uses are identified at this time; the scenario only includes retaining and mothballing the structure).

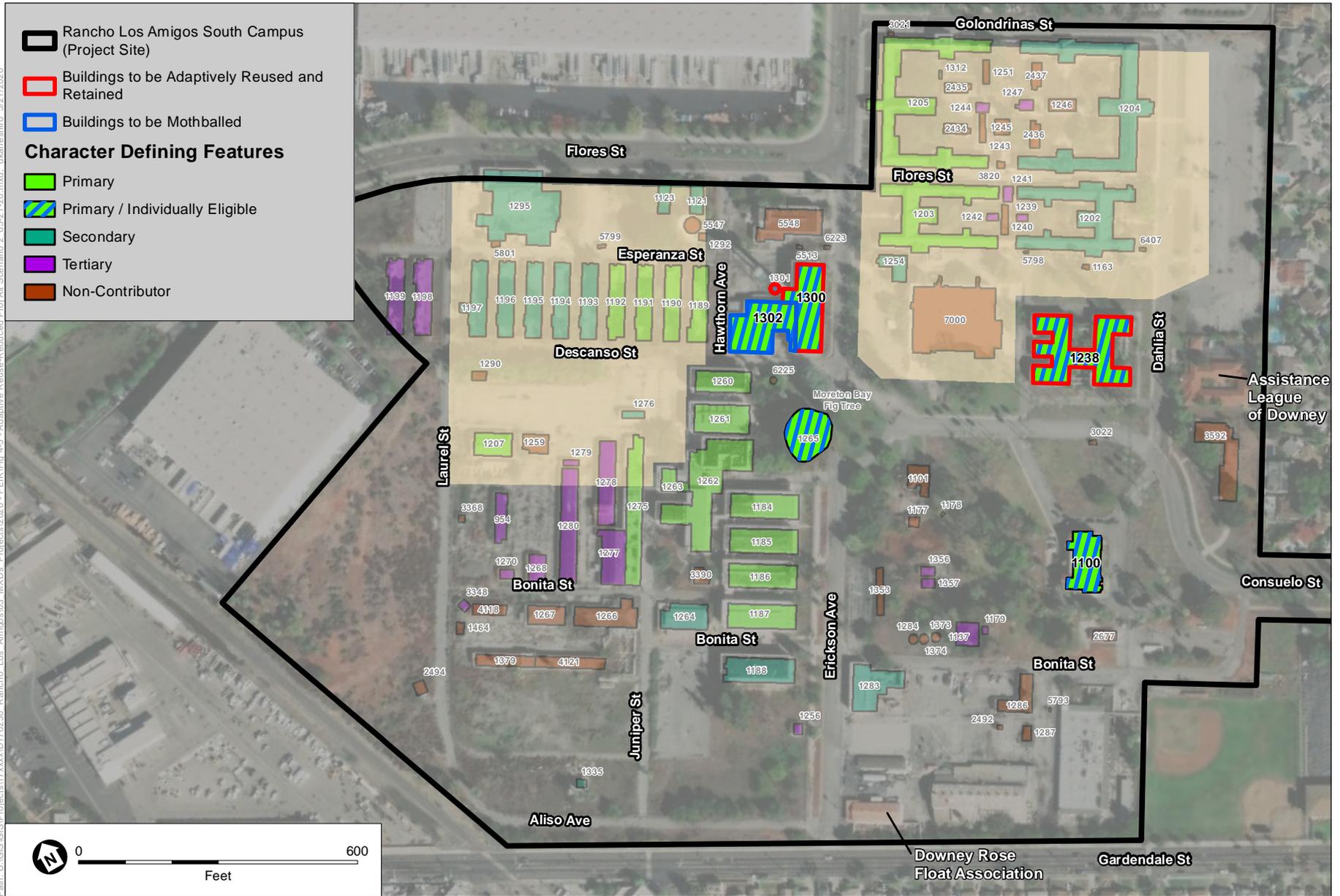
TABLE 4-6
BUILDINGS TO BE ADAPTIVELY REUSED AND MOTHBALLED UNDER ALTERNATIVE 4 SCENARIO 2

<u>LACO Building Number/Name</u>	<u>Approximate Square Footage</u>	<u>Ranking</u>	<u>Use</u>
<u>1238 – Casa Consuelo</u>	<u>37,808</u>	<u>Primary/Individually Eligible</u>	<u>Adaptive Reuse with County Uses</u>
<u>1300- Power Plant</u>	<u>10,175</u>	<u>Primary/Individually Eligible</u>	<u>Adaptive Reuse with County Uses</u>
<u>1301 - Water Tower</u>	<u>--</u>	<u>Primary/Individually Eligible</u>	<u>Restored, repainted, seismic upgrades</u>
<u>1302 – Shop, Laundry, Ice Plant</u>	<u>12,738</u>	<u>Primary/Individually Eligible</u>	<u>Mothballed</u>
<u>Total Usable Square Footage</u>	<u>47,983</u>		

In addition to the buildings to be retained, adaptively reused where indicated, and mothballed, this scenario would also include new construction in the Development Area as proposed under the Project. Similar to the Project, this scenario would construct up to 650,000 square feet of floor area for the ISD Headquarters, Probation Department Headquarters, and County Office Building. This scenario would also develop the ISD/Probation Parking Structure and County Office Parking Structure, as well as all necessary infrastructure improvements. The ISD/Probation Parking Structure would be setback at least 118 feet from the eastern Project Site boundary to provide an increased distance between the new development and the nearby residential neighborhood east of the Project Site as compared to the Project (see Figure 4-5). As stated within Chapter 2, *Project Description*, of the Draft EIR, the new construction on the Project Site would utilize the design-build process, and due to this evolving process, it was determined that the ancillary and support spaces within the ISD and Probation Department Headquarters buildings would be increased to offer more collaborative spaces for the County employees. Therefore, employees under this scenario would be moved to the adaptively reused buildings.

The proposed County uses (ISD Headquarters, Probation Department Headquarters, and County Office Building) would have the same design elements and operational characteristics as described in Chapter 2, *Project Description*, of the Draft EIR. The adaptively reused buildings, in combination with the proposed County uses, would similarly house 3,000 County employees as analyzed under the Project. Therefore, operational characteristics are anticipated to be similar under this scenario as with the Project as analyzed in the Draft EIR. Although additional construction efforts would be needed to rehabilitate the buildings, less demolition would occur and overall, construction phases would be similar. It is assumed for this scenario that the maximum daily construction workers and equipment that would be utilized by phase during construction would be the same as analyzed for the proposed Project. Remedial activities related to the contaminated groundwater plume would occur on the Project Site in the same manner as the Project, following the demolition of LACO No. 1276 (a Secondary Contributor).

Path: U:\GIS\GIS\Projects\17xxxx\170230_Rancho_Los_Amigos\03_MXD\Projects\2020 - FEIR\Fig. 4.5 - Adaptive Reuse/Reduced Project Alt. Scenario 2_05-21-20.mxd, dkanshiro, 6/21/2020



SOURCE: DigitalGlobe, 2016 (Aerial), ESA, 2019.

Rancho Los Amigos South Campus
Final Environmental Impact Report
Final EIR Figure 4-5

Adaptive Reuse/Reduced Project Alternative Scenario 2



As stated in Chapter 5, *Other CEQA Considerations*, of the Draft EIR, the following resource areas were not discussed in detail in the EIR as impacts were found to not be significant: Agricultural and Forest Resources, Geology and Soils, Mineral Resources, Population and Housing, Public Services, Recreation, and Wildfires. Scenario 1 under the Adaptive Reuse/Reduced Project Alternative would move a reduced number of County uses and employees into the 12 selected historic buildings on the Project Site and no new construction (e.g., ground-up construction for new buildings) would occur. Scenario 2 under the Adaptive Reuse/Reduced Project Alternative would relocate a portion of the 3,000 County employees into two selected historic buildings. In addition, the remaining employees would relocate into the two newly constructed buildings within the Development Area. Therefore, the Adaptive Reuse/Reduced Project Alternative, under both scenarios, would have reduced impacts compared to the Project in regard to Geology and Soils (as the adaptively reused buildings would be brought up to current seismic codes), and similar impacts as the Project for Population and Housing, Public Services, and Recreation. There would be no impacts to Agricultural and Forest Resources, Mineral Resources, and Wildfires. Therefore, impacts to these resource areas under both scenarios of the Adaptive Reuse/Reduced Project Alternative would be similar or reduced compared to the proposed Project.

Overview of Comparative Impacts

Aesthetics

Under the Adaptive Reuse/Reduced Project Alternative Scenario 1, all of the proposed County uses and employees that would be located on the Project Site would be relocated into existing Individually Eligible buildings, select Primary Contributors, and a Secondary Contributor within the District. Under this alternative, demolition would be reduced and no new buildings would be constructed within the Project Site. Under Scenario 2, a portion of the proposed County uses would be relocated into existing Individually Eligible buildings, and new construction in the Development Area would occur as proposed under the Project. Under both scenarios of this alternative, demolition would be reduced. As with the proposed Project, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would not have a substantial adverse effect on a scenic vista and would not substantially damage scenic resources, and impacts would be less than significant and there would be no impact. Under Scenario 2, LACO No. 1301 (Water Tower) would be restored and repainted thereby retaining an important scenic resource on the Project Site that would continue to serve as a visual focal point on the South Campus. In addition, similar to the proposed Project, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would not conflict with applicable zoning and other regulations governing scenic quality, and the impact would be less than significant. However, while the existing historic buildings would be adaptively reused within the same envelopes as they currently exist on the Project Site, demolition on the Project Site would still result in significant impacts on the existing visual character. With implementation of Mitigation Measures MM-CUL-1b and CUL-1c, similar to the proposed Project, impacts on visual character under the Adaptive Reuse/Reduced Project Alternative (both scenarios) would be reduced to less than significant and would be less than under the proposed Project. Furthermore, this alternative (Scenario 1) would not create a new source of substantial light or glare, and the impact would be less than significant. While Scenario 2, similar to the Project, would create a new source of light and glare, all lighting would be shielded and directed

downwards to minimize illumination and light pollution on adjacent properties. All materials would similarly use low-reflectivity glass and/or materials treated with a low-reflective coating and would therefore have low glare potential. Windows for the adaptively reused buildings would be replaced in accordance with the Secretary of Interior Rehabilitation Guidelines with windows that would have low reflectivity glass or low reflectivity coating, but would still maintain the historic appearance and character. Impacts under Scenario 2 for light and glare would be less than significant. Impacts under the Adaptive Reuse/Reduced Project Alternative would be less than those of the proposed Project (Scenario 1) or similar to those of the proposed Project (Scenario 2).

As discussed in Section 3.1, *Aesthetics*, the proposed Project would have a significant and unavoidable shade and shadow impact to the residential uses to the east of the Project Site. As the Adaptive Reuse/Reduced Project Alternative Scenario 1 would not construct any new buildings on the Project Site, as a portion of the proposed County uses would be relocated into existing Individually Eligible buildings and select Primary Contributors within the District, which would be adaptively reused for this purpose. Therefore, the Adaptive Reuse/Reduced Project Alternative Scenario 1 would eliminate the shade and shadow impacts. Impacts related to shade and shadow under Scenario 1 would be less than those of the proposed Project, and would be reduced to less-than-significant levels. Under Scenario 2, the ISD/Probation Headquarters Building would be developed in the northeastern quadrant of the Project Site, which as analyzed under the Project, but the eastern boundary of the ISD/Probation Parking Structure would be setback at least 118 feet from the boundaries of the Project Site. Therefore, with the increased setback of the ISD/Probation Parking Structure, the significant and unavoidable shade and shadow impacts on the residential uses to the east of the Project Site would be reduced to less than significant. Therefore, under Scenario 2, impacts related to shade and shadow would be less than those of the proposed Project.

Air Quality

Under the Adaptive Reuse/Reduced Project Alternative Scenario 1, construction of the Adaptive Reuse/Reduced Project Alternative would be reduced on a daily basis as compared to the proposed Project as required construction activities would be limited to demolition of the Tertiary Contributors (21 buildings) and Non-Contributors (48 buildings) on the Project Site and any construction activities that would be required to adaptively reuse the proposed buildings for County purposes (including minor excavation activities). Under Scenario 2, although additional construction efforts would be needed to rehabilitate the buildings, less demolition would occur and overall, construction phases would be similar. It is assumed for this scenario that the maximum daily construction workers and equipment that would be utilized by phase during construction would be the same as analyzed for the proposed Project. Therefore, while there would be the additional adaptive reuse under Scenario 2, the construction emissions as provided in the Draft EIR for the Project would be similar under Scenario 2. Operation of the Adaptive Reuse/Reduced Project Alternative Scenario 1 would be reduced as the number of County staff that would be relocated to the Project Site would be ~~1,651~~ 933 people, which would be 2,067 employees less than the approximately 3,000 County-budgeted positions assumed under the proposed Project. Therefore, air quality emissions associated with the operational vehicle trips would be less than the Project. Operation of Scenario 2 would relocate 3,000 County-budgeted

positions as assumed under the Project. Therefore, operational air quality impacts under Scenario 2 would be similar to the Project.

Similar to the Project, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would not conflict with the applicable air quality plan, expose sensitive receptors to substantial pollutant concentrations with the implementation of Mitigation Measures MM-AIR-2, MM-AIR-3, and MM-AIR-4, or result in other emissions (such as those leading to odors) affecting a substantial number of people, and impacts would be less than significant.

With regard to regional construction impacts, under the proposed Project, the highest emissions of volatile organic compounds (VOCs) would occur during the architectural coatings phase and the highest levels of NO_x emissions would occur during the site preparation, soil remediation, and overlapping site preparation, soil remediation, and demolition phases. As Although there is a reduced amount of new (ground up) construction duration for the Adaptive Reuse/Reduced Project Alternative Scenario 1, construction associated with adaptive reuse would still occur. Scenario 2 would have the same amount of new (ground up) construction as the Project, including construction associated with adaptive reuse. Therefore, would be a reduced amount of overall construction impacts. However, daily construction emissions would are expected to be similar to those of the proposed Project and therefore significant pre-mitigation. As such, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would implement Mitigation Measures MM-AIR-1 and AIR-2, similar to the Project, to reduce construction emissions to below the SCAQMD regional thresholds. With implementation of these mitigation measures, impacts during construction would be less than significant but would be less than the proposed Project.

Under the proposed Project, operation would exceed the NO_x impacts. This is driven predominately by operational mobile sources and stationary sources. Mobile sources would be reduced under the Adaptive Reuse/Reduced Project Alternative (Scenario 1) as the number of County staff that would be relocated to the Project Site would be ~~4,651 persons~~ 933 employees, ~~which is nearly half of the 3,000 County staff assumed under the proposed Project.~~³ **Table 4-57,** below, provides the estimated unmitigated regional operational air quality emissions. The Adaptive Reuse/Reduced Project Alternative (both scenarios) would implement Mitigation Measures MM-AIR-3 through MM-AIR-5. **Table 4-68,** below, provides the estimated mitigated regional operational air quality emissions with implementation of these mitigation measures and includes the reduction in the number of vehicle trips under Scenario 1, which results in a corresponding reduction in mobile emissions due to the reduced number of County staff that would be relocated to the Project Site. As shown therein, with implementation of mitigation measures, the significant and unavoidable operational impacts would be eliminated under the Adaptive Reuse/Reduced Project Alternative Scenario 1.

³ The remaining employees that would not move to the Project Site under this alternative Scenario 1 would still generate mobile source emissions. However, as the emissions are part of the baseline, they are not considered as part of this analysis.

TABLE 4-57
MAXIMUM UNMITIGATED REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY) FOR SCENARIO 1^a

Source	VOC	NO _x	CO	SO ₂	PM10	PM2.5
Proposed Project						
Area (Coating, Consumer Products, Landscaping)	15	<1	<1	<1	<1	<1
Energy	<1	2	2	<1	<1	<1
Mobile	6 <u>9</u>	29 <u>37</u>	74 <u>93</u>	<1	24 <u>27</u>	6 <u>7</u>
Stationary (4 Emergency Generators)	9	180	102	<1	6	6
Total Regional Emissions	30 <u>33</u>	214 <u>219</u>	178 <u>197</u>	<1	27 <u>33</u>	12 <u>13</u>
SCAQMD Regional Significance Threshold	55	55	550	150	150	55
Exceeds Thresholds?	No	Yes	No	No	No	No

^a Emissions for mobile sources provided below have been reduced based on a 45 69 percent reduction in County staff that would be relocated to the Project Site [1,654 933 employees assumed for this alternative versus 3,000 employees assumed for the proposed Project ((3,000-1,654 933)/3,000) = 44.967 68.9 percent)]. All other air quality emissions were conservatively assumed to remain constant.

SOURCE: ESA, 2019 2020.

TABLE 4-68
MAXIMUM MITIGATED REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY) FOR SCENARIO 1^a

Source	VOC	NO _x	CO	SO ₂	PM10	PM2.5
Proposed Project						
Area (Coating, Consumer Products, Landscaping)	15	<1	<1	<1	<1	<1
Energy	<1	2	2	<1	<1	<1
Mobile	6 <u>9</u>	29 <u>37</u>	74 <u>93</u>	<1	24 <u>27</u>	6 <u>7</u>
Stationary (4 Emergency Generators)	<1	4	11	<1	<1	<1
Total Regional Emissions	22 <u>24</u>	35 <u>43</u>	87 <u>106</u>	<1	24 <u>27</u>	6 <u>7</u>
SCAQMD Regional Significance Threshold	55	55	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

^a Emissions for mobile sources provided below have been reduced based on a 45 69 percent reduction in County staff that would be relocated to the Project Site [1,654 933 employees assumed for this alternative versus 3,000 employees assumed for the proposed Project ((3,000-1,654 933)/3,000) = 44.967 68.9 percent)]. All other air quality emissions were conservatively assumed to remain constant.

SOURCE: ESA, 2019 2020.

Under Scenario 2, similar to the Project, 3,000 employees would be housed on the Project Site within the new construction and the adaptively reused buildings. Therefore, the operational emissions, both mitigated and unmitigated, would be the same as analyzed in Section 3.2, Air Quality, of the Draft EIR for the proposed Project. Therefore, even with implementation of mitigation measures, impacts related to regional NO_x operational emissions would continue to be significant and unavoidable with mitigation under Scenario 2.

Biological Resources

Under the Adaptive Reuse/Reduced Project Alternative Scenario 1, the construction duration and types of phases required would be reduced as compared to the proposed Project as required construction activities would be limited to demolition of the Tertiary Contributors (21 buildings) and Non-Contributors (48 buildings) on the Project Site and any construction activities that would be required to adaptively reuse the proposed buildings for County purposes. Similarly, under Scenario 2, although additional construction efforts would be needed to rehabilitate the buildings, less demolition would occur and overall, construction phases would be similar. It is assumed for this scenario that the maximum daily construction workers and equipment that would be utilized by phase during construction would be the same as analyzed for the proposed Project. Operation of the Adaptive Reuse/Reduced Project Alternative Scenario 1 would be reduced as the number of County staff that would be relocated to the Project Site would be ~~1,651~~ 933 persons, which would be less than the approximately 3,000 County-budgeted positions assumed under the proposed Project. Operation of Scenario 2 would relocate 3,000 County-budgeted positions as assumed under the Project.

As with the proposed Project, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would have no impacts related to species identified as a candidate, sensitive, or special status species; riparian habitats; state or federally protected wetlands; and consistency with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Similar to the proposed Project, construction during the Adaptive Reuse/Reduced Project Alternative (both scenarios) would have the potential to affect maternity bat roosts and active bird nests, which would potentially be a significant impact, although to a lesser extent than the proposed Project as there would be fewer buildings and vegetation removed. As such, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would implement Mitigation Measures MM-BIO-1 and BIO-2, similar to the proposed Project. With implementation of these mitigation measures, impacts to the movement of any native resident or migratory fish or wildlife species would be reduced to less than significant. In addition, similar to the proposed Project, construction of the Adaptive Reuse/Reduced Project Alternative (both scenarios) could affect protected oaks located on the Project Site, a significant impact. As such, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would implement Mitigation Measures MM-BIO-3 and BIO-4, similar to the proposed Project. With implementation of these mitigation measures, impacts related to consistency with local policies or ordinances protection biological resources would be reduced to less than significant.

Cultural Resources

Under the Adaptive Reuse/Reduced Project Alternative Scenario 1, the construction duration and types of phases required would be reduced as compared to the proposed Project as required construction activities would be limited to demolition of the Tertiary Contributors (21 buildings) and Non-Contributors (48 buildings) on the Project Site and any construction activities that would be required to adaptively reuse the proposed buildings for County purposes. Under Scenario 2, although additional construction efforts would be needed to rehabilitate the buildings, less demolition would occur and overall, construction phases would be similar to those under the Project. It is assumed for this scenario that the maximum daily construction workers and

equipment that would be utilized by phase during construction would be the same as analyzed for the proposed Project.

Operation of the Adaptive Reuse/Reduced Project Alternative Scenario 1 would be reduced as the number of County staff that would be relocated to the Project Site would be ~~1,651~~ 933 persons, which would be less than the approximately 3,000 County-budgeted positions assumed under the proposed Project. Operation of the Adaptive Reuse/Reduced Project Alternative Scenario 1 would not result in additional impacts to the District since the District would continue to exist and the buildings would be occupied and maintained. There would be no potential for adverse impacts resulting from proximate presence of the County facilities since County operations would be located in the ~~R~~rehabilitated buildings and no new construction would occur, thus, the visual context of the remaining resources would be retained.

Under the Adaptive Reuse/Reduced Project Alternative Scenario 1, the Project would rehabilitate 12 Primary and Secondary Contributors, three of which are also Individually Eligible buildings, to meet some of the County's new uses. The Adaptive Reuse/Reduced Project Alternative Scenario 1 would also retain and mothball all other Primary and Secondary Contributors, while removing Tertiary Contributors and Non-Contributing buildings from the Project Site. All the Individually eligible resources: LACO No. 1100 (Administration Building); LACO No. 1238 (Casa Consuelo); LACO No. 1300 (Power Plant); LACO No. 1301 (Water Tower); LACO No. 1302 (Shop, Laundry, and Ice Plant); and the Moreton Bay Fig Tree would be retained intact and their current status as historical resources would be unchanged. While the removal of Non-Contributing buildings would not have a negative effect on the eligibility of the District, removal of Tertiary Contributors would result in an adverse impact to the integrity of the District by removing contributing contextual resources from the District. However, the impact caused by the Adaptive Reuse/Reduced Project Alternative Scenario 1 would be less than significant because the District would retain all key Primary and Secondary contributors and examples of each of the seven building types that characterize its historical significance as described in the Historical District Evaluation Report, included in Appendix D-1 of this Draft EIR. Furthermore, a total of 40 key Contributors would be retained which would amount to the majority of the District (65 percent). As a result, the District would continue to convey its historical significance and would still retain most but not all of its cohesive context. While ~~this alternative~~ Scenario 1 would demolish all 21 Tertiary Contributors and all 48 Non-Contributors and would adversely impact the integrity of the District, potential impacts under the Adaptive Reuse/Reduced Project Alternative Scenario 1 would be less than significant because the eligibility of the District as a historical resource would not be substantially changed such that its eligibility would be lost.

Operation of Scenario 2 would relocate 3,000 County-budgeted positions assumed under the Project. Operation of the Adaptive Reuse/Reduced Project Alternative Scenario 2 would not result in additional impacts to the District beyond those analyzed in the Draft EIR for the proposed Project since the District would no longer exist. A total of six District Contributors (10 percent) would be retained and mothballed, five of which would be Primary Contributors within the Development Area and one of which would be a Primary Contributor outside of the Development Area.

Under the Adaptive Reuse/Reduced Project Alternative Scenario 2, the Project would rehabilitate two Primary Contributors, both of which are Individually Eligible buildings, to house some of the County’s proposed uses. LACO No. 1301 (Water Tower), a Primary Contributor and Individually Eligible structure, would be restored, repainted, and seismically upgraded and would continue to be a focal point for the Project Site. LACO No. 1302 (Shop & Laundry), an Individually Eligible Primary Contributor, would be mothballed for future County use (no funding or uses are identified at this time; the scenario only includes retaining and mothballing the structure). LACO No. 1100 (Administration Building) and the Moreton Bay Fig Tree would, similar to existing conditions, be retained. The Adaptive Reuse/Reduced Project Alternative Scenario 2 would demolish all other remaining buildings, structures, and features. Even though Scenario 2 would adaptively reuse and retain two more Individually Eligible Primary Contributors than the proposed Project, implementation of this scenario would result in a substantial adverse change in the eligibility of the District because Key Contributors would be lost and the District would no longer convey most of its historic associations. The integrity of the District would be materially impaired due to the loss of the majority of its resources and erosion of its continuity and cohesiveness, and this would result in a substantial adverse change in its eligibility for listing in the National Register or California Register. Adverse impacts to the District caused by the removal of the majority of Contributors and substantial adverse change in the historic significance of the District would result in a significant unavoidable impact to historical resources, though to a lesser extent than under the proposed Project. While mitigation measures MM-CUL-1a, MM-CUL-1b, and MM-CUL-1c, which has been modified⁴ to accommodate the number of District contributors that would be demolished under Scenario 2, are recommended below to reduce adverse impacts, direct impacts to historical resources under Scenario 2 would remain significant and unavoidable after completion of this scenario because the historic significance of the District would be substantially changed due to material impairment by demolition and alteration.

Mitigation Measure MM-CUL-1c (MM-CUL-1c): Salvage Plan and Inventory Report. Prior to the start of demolition, the County shall retain a Qualified Preservation Professional to prepare a Salvage Plan and Inventory Report for all District Contributors to be demolished, which would ~~outline~~ outline salvageable materials and reuse or disposal options. The Qualified Preservation Professional shall conduct an inventory of ~~the~~ those 57 District contributors’ key character-defining physical features (e.g., decorative features, window elements, shingling, etc.) appropriate for salvage and interpretation. The Salvage Plan and Inventory Report shall include retention of LACO No. 1301 (Water Tower) for inclusion in the interpretive program. Unsound, decayed, or toxic materials (e.g., asbestos, lead paint, etc.) need not be included in the salvage plan. Once salvageable materials are identified, the Qualified Preservation Professional shall monitor their collection by the County’s construction contractor(s) to ensure the items are appropriately salvaged and are not damaged during removal. Salvage of materials can occur prior to the start of demolition, or concurrently with demolition, as feasible. Salvaged materials shall be stored onsite either in existing structures, or in an offsite storage facility, to limit exposure to the elements (rain/sun, vandalism, and theft).

⁴ While the Mitigation Measure MM-CUL-1c was not provided in full within Chapter 4, *Alternatives*, of the Draft EIR, Mitigation Measure MM-CUL-1c is provided here to show where modifications were made specific to this alternative.

Salvaged materials shall first be made available for use in the interpretive program to be developed under Mitigation Measure MM-CUL-1b or for use in any potential future restoration/rehabilitation projects on the Project Site. Salvaged materials that are not re-used onsite or in the interpretative program shall be offered for donation to local historical societies, preservation organizations, or the like, for curatorial and/or educational purposes, or to the general public for reuse in rehabilitation of historic structures. Salvaged materials offered for donation shall be advertised for a period of not less than 30 days on the County's website and in historic preservation websites, such as Preservationdirectory.com and Oldhouseonline.com, and the *Los Angeles Times*, as well as by posting on the Project Site itself and by other means as deemed appropriate.

The Qualified Preservation Professional shall document these efforts in writing, to include salvage methods, an inventory of salvaged materials, and a summary of all measures taken to encourage receipt of salvaged materials by local historical societies, preservation organizations, and the public.

Copies of notices and evidence of publication of such notices, along with a summary of results from the publicity efforts, a list of materials that were donated (if any) and to whom, and an explanation of why materials were not or could not be accepted, shall be included in a salvage summary document to be submitted to the County within 15 days of the close of the 30-day (or more) notice period. Salvaged materials that are not re-used onsite or in the interpretative program, or accepted for donation, may be disposed of by the County upon receipt of the salvage summary document.

The adaptive reuse of the Individually Eligible and selected Primary and Secondary Contributors and under both scenarios of this alternative would require substantial construction in order to rehabilitate the historic buildings for County reuse. Feasibility Studies completed by Sapphos (Sapphos, 2008-2009) indicate that each of the buildings selected for reuse under the Adaptive Reuse/Reduced Project Alternative require substantial structural and seismic upgrades, as well as the replacement or repair of architectural features and materials. The Sapphos reports noted the presence of debris, mold, and hazardous materials throughout the buildings and recommended improvements including replacement of all mechanical, plumbing, and electrical systems, repair or replacement in kind of all windows and doors, renovation of restrooms with ADA accessible male and female facilities, and addition of elevators in compliance with ADA standards. The necessary rehabilitation work under the Adaptive Reuse/Reduced Project Alternative could result in direct and indirect significant impacts during construction to the Individually Eligible buildings and the District that could affect their Individually Eligible status designation. More specifically, construction, either removal of structures or new construction including road work, within the proximity of historic resources to remain could result in indirect physical impacts, such as foundation damage, structural damage, inadvertent damage from increased heavy vehicle traffic, and groundborne vibration-related impacts. As with the Project, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would result in potentially significant indirect impacts to the Moreton Bay Fig Tree as a result of the change in setting and construction within proximity of the tree. However, any potentially significant indirect impacts caused by during construction of the Adaptive Reuse/Reduced Project Alternative (both scenarios) could be reduced to less than significant through the implementation of ~~could be reduced to less than significant by~~

~~implementation of Mitigation Measure MM-CUL-1f, which has been modified⁵ to which would require a review of the construction and rehabilitation plans proposed under this alternative, to ensure that the Project preparation of plan review reports, and monitoring during construction to ensure that the Alternative (both scenarios) would conform to the Secretary of Interior's Standards and the historic resources to remain would, including the Moreton Bay Fig Tree, retain their eligibility post-construction.~~ In general, a project that complies with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (Weeks and Grimmer, 2018) is considered to have mitigated its impacts to historical resources to a less than significant level (CEQA Guidelines Section 15064.5(b)(3)). In addition, Mitigation Measures MM-CUL-1a and 1b would reduce the impact to the Moreton Bay Fig Tree's eligibility caused by the removal of the surrounding neighborhood (the District). If the rehabilitation of the Individually Eligible and selected Primary and Secondary Contributors conforms with the Secretary's Standards, impacts caused by the Adaptive Reuse/Reduced Project Alternative (both scenarios) would be less than significant and less than those of the proposed Project.

In addition, with regard to operation, as with the proposed Project, the Adaptive Reuse/Reduced Project Alternative Scenario 2 would introduce new visual elements through the new construction and would alter existing elements within the setting. The proposed ISD and Probation Department Headquarters and County Office Building would be located more than 300 feet away from LACO No. 1100 and are not considered adjacent new construction under Standards 9 and 10. The new construction would occur approximately 40 feet to the north of LACO No. 1238 and the realignment of Dahlia Avenue to the east of the building and therefore would indirectly impact the setting of the Individually Eligible building. Additionally, new construction would be located in proximity to LACOs No. 1300 and 1302, which would indirectly impact the setting of these remaining Individually Eligible buildings. However, as with the proposed Project, the new construction under Scenario 2 would conform to Standards 9 and 10, which would result in a less-than-significant level.

Mitigation Measure CUL-1e (MM-CUL-1e): Avoidance and Protection of Retained Historic Resources during Construction. Prior to the start of construction, a Qualified Preservation Professional shall be retained to develop a plan of action for avoidance, ~~and~~ protection, and preservation of the retained historic resources (~~LACO No. 1100 [Administration Building], LACO No. 1238 [Casa Consuelo], LACO No. 1301 [Water Tower], and the Moreton Bay Fig Tree~~) in conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings by Kay D. Weeks and Anne E. Grimmer (U.S. Department of the Interior, National Park Service, 1995, revised by Anne E. Grimmer, 2017), including the Individually Eligible, Primary Contributors and/or Secondary Contributors in the District that that would be adaptively reused or mothballed, in coordination with the County. The Qualified Preservation

⁵ While the Mitigation Measure MM-CUL-1e was not provided in full within Chapter 4, Alternatives, of the Draft EIR, Mitigation Measure MM-CUL-1e is provided here to show where modifications were made specific to this alternative.

Professional shall consult with a qualified arborist in identification and implementation of protective measures for the Moreton Bay Fig Tree. The plan shall include at a minimum:

1. Notation of the building/structure/feature on construction plans.
2. Pre-construction survey to document the existing physical condition of the building/structure/feature.
3. The County shall retain a Qualified Preservation Professional, who meets the Secretary of the Interior's Professional Qualifications Requirements in Architectural History and/or Historic Architecture and has a minimum of 10 years of experience in reviewing projects for conformance with the Standards. The Qualified Preservation Professional shall review the 50% and 90% construction plans for selected buildings/structures to be restored or adaptively reused for conformance with the Secretary of the Interior's Standards (Weeks & Grimmer, 2017) and prepare a plan review report for each selected building/structure that shall document conformance with Standards and provide appropriate preservation recommendations to ensure Standards conformance for submittal to the County prior to issuance of a demolition/alteration permit for affected buildings/structures.
34. Procedures and timing for the placement and removal of a protective barrier(s), such as protective wood boards, bracing or framing to protect fragile fenestration and other exposed architecture features and materials, protective fencing and/or concrete or water-filled plastic K-rails around each retained building/structure/feature.
45. Monitoring of the installation and removal of protective barriers by the Qualified Preservation Professional, or his or her designee.
56. Monitoring of the condition of the building/structure/feature at regular intervals during the duration of demolition and construction including vibration monitoring as defined in Mitigation Measure NOI-3 and visual inspections by a qualified Preservation Professional.
67. Monitoring of the condition of the Moreton Bay Fig Tree by a qualified arborist at regular intervals during the duration of demolition and construction and implementation of any necessary care to protect the health of the tree by the County.
8. For any buildings/structures selected to be restored or adaptively reused, the retained Qualified Preservation Professional (see number 3) shall conduct construction monitoring at regular intervals during demolition and construction and provide preservation treatment recommendations as needed to address unforeseen discoveries or construction changes or any other issues that may arise that may affect historic materials, features, or finishes, in order to ensure the work is completed in conformance with the Standards. The Qualified Preservation Professional shall document each monitoring visit in a monitoring report to the County.
79. Post-construction survey to document the condition of the building/structure/feature after completion of the Project.

810. Preparation of a technical memorandum documenting the pre-construction and post-construction conditions of LACO No. 1100, LACO No. 1238, LACO No. 1301, retained historical built environment resources and the Moreton Bay Fig Tree and compliance with protective measures outlined in this mitigation measure.
11. For any buildings/structures selected to be restored or adaptively reused, the retained Qualified Preservation Professional (see number 3) shall document overall project conformance with the Standards in a final completion report to the County that shall summarize how preservation treatment specifications included on the construction plans were implemented in conformance with the Standards, and furthermore, how unforeseen discoveries or construction changes were resolved and implemented in conformance with the Standards.

The plan shall comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) and shall be memorialized in a technical memorandum, which shall be submitted to County for review and approval. The final approved plan shall be submitted to County no later than 30 days prior to the start of construction including any staging or demolition activities. The plan shall be provided to each construction manager/foreman at the Project kick-off meeting for each phase of work. The technical memorandum documenting the pre-construction and post-construction conditions shall be submitted to the County within 30 days of completion of the Project and removal of the protective barriers.

In addition, prior to the start of construction, the County shall inform construction personnel of the location and significance of the retained historic resources, and of the avoidance and protective measures that shall be implemented. If work crews are phased, the County shall ensure that each crew is provided with this information.

Finally, the ~~Project Adaptive Reuse/Reduced Project Alternative Scenario 1~~ would retain remaining Primary and Secondary Contributors for mothballing ~~under the Adaptive Reuse/Reduced Project Alternative~~, save for the LACO No. 1100 which has ~~been~~ already been rehabilitated and is currently occupied. Scenario 2 would retain and mothball one Individually Eligible Primary Contributor (LACO No. 1302) for future County use. The mothballing process would require structural stabilization, pest control measures, weatherization, adequate ventilation, and security measures for all of the mothballed buildings. Implementation of the mothballing process on the remaining Primary and Secondary Contributors ~~under the Adaptive Reuse/Reduced Project Alternative Scenario 1 and the one Primary Contributor for Scenario 2~~ could cause material impairment to the contributing buildings, resulting in direct significant impacts to the District. However, the potential for impacts under the Adaptive Reuse/Reduced Project Alternative (both scenarios) could be reduced to less-than-significant by implementation of Mitigation Measure MM-CUL-1ed for all historic buildings to be mothballed, which requires the development of a Mothballing Plan in accordance with National Park Service *Preservation Brief No. 31, Mothballing Historic Buildings*. With the implementation of a Mothballing Plan (Mitigation Measure MM-CUL-1ed), impacts under the Adaptive Reuse/Reduced Project Alternative (both scenarios) would be less than significant and less than those of the proposed

Project. Mitigation Measure MM-CUL-1d has been slightly modified for this alternative, as shown below.

Mitigation Measure MM-CUL-1d (MM-CUL-1d): Mothballing Plan. The County shall retain a Qualified Preservation Professional to prepare and implement a Mothballing Plan for Individually Eligible, Primary Contributors and/or Secondary Contributors in the District that are selected to be mothballed. The Mothballing Plan shall outline the proposed mothballing process in compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and consistent with National Park Service Preservation Brief No. 31, Mothballing Historic Buildings. The Plan shall include at a minimum: a condition assessment; measures for structural stabilization as necessary; pest control measures; weatherization efforts as necessary; and other mothballing procedures, such as securing the building, providing adequate ventilation, and developing a maintenance and monitoring plan. Once the buildings/structures have been mothballed, the Qualified Preservation Professional shall review the resulting condition of the buildings/structures and provide the County with documentation confirming that the Plan has been carried out.

Mothballing shall be completed within 1 year of the initiation of construction activities (construction and mothballing can occur simultaneous). The County shall carry out the Plan's maintenance and monitoring procedures until such time as rehabilitation and/or reuse of the buildings/structures occurs. While there is currently no proposed use for these buildings/structures, any future rehabilitation project will be evaluated for conformance with the Standards. Conditions of the mothballed buildings/structures shall be reassessed and documented every five years by a Qualified Preservation Professional and recommendations for necessary maintenance/structural repairs shall be completed by the County within six months of every reassessment.

While mitigation measures are provided to reduce significant impacts, impacts to historical resources under Scenario 2 would remain significant and unavoidable because the historic significance of the District would be substantially changed due to material impairment by demolition and alteration. Therefore, while impacts to historical resources would be less than those of the proposed Project, impacts would still be significant and unavoidable.

As described above, the construction of the proposed Project would be limited to the demolition of the Tertiary Contributors (21 buildings) and Non Contributors (48 buildings) on the Project Site and any construction activities that would be required to adaptively reuse the selected 12 buildings for County purposes. As the Adaptive Reuse/Reduced Project Alternative (both scenarios) would still require excavation and grading, there is still potential to impact unknown buried archaeological resources during demolition and construction activities within the Project Site. Therefore, if previously undiscovered artifacts or cultural remains are uncovered during ground disturbance related to construction or demolition activities, the proposed Project could result in significant impacts to archaeological resources that qualify either as historical resources or unique archaeological resources under CEQA. As such, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would similarly implement Mitigation Measures MM-CUL-2a, CUL-2b, CUL-2c, CUL-2d, CUL-2e, and CUL-2f, to reduce impacts to archaeological resources to less than significant. As there would be a reduction in the construction activities for the alternative as compared to the proposed Project, impacts would be less than under the Project. As operation

under the Adaptive Reuse/Reduced Project Alternative (both scenarios) would not result in ground disturbing activities, there would be no potential to encounter, alter, or disturb archaeological resources. No operational impacts would occur, similar to the Project.

As the Adaptive Reuse/Reduced Project Alternative (both scenarios) would similarly demolish and excavate, there is potential for the alternative to impact paleontological resources. Therefore, if previously undiscovered fossils were discovered, the alternative could result in significant impacts to paleontological resources. Under Scenario 1, there would be no excavation but there would still be demolition on the Project Site. Under Scenario 2, there would be both demolition and excavation. The Adaptive Reuse/Reduced Project Alternative (both scenarios) would similarly implement Mitigation Measures MM-CUL-3a, CUL-3b, CUL-3c, and CUL-3d to reduce impacts to less than significant levels. Therefore, construction impacts on paleontological resources would be less than under the Project for Scenario 1 but similar to the Project for Scenario 2. As operation under the Adaptive Reuse/Reduced Project Alternative (both scenarios) would not result in ground disturbing activities, there would be no potential to encounter, alter, or disturb paleontological resources. No operational impacts would occur, similar to the Project.

No dedicated cemeteries or human remains were identified within the Project Site. However, as the Project Site has high sensitivity for the presence of subsurface archaeological resources, there is a potential for human remains to be discovered during construction, which would result in significant impacts. The Adaptive Reuse/Reduced Project Alternative (both scenarios) would similarly implement Mitigation Measure MM-CUL-4 to reduce impacts to a less than significant level. As operation under the Adaptive Reuse/Reduced Project Alternative (both scenarios) would not result in ground disturbing activities, there would be no potential to encounter, alter, or disturb human remains. No operational impacts would occur, similar to the Project.

Energy

Under the Adaptive Reuse/Reduced Project Alternative Scenario 1, the construction duration and types of phases required would be reduced as compared to the proposed Project as required construction activities would be limited to demolition of the Tertiary Contributors (21 buildings) and Non-Contributors (48 buildings) on the Project Site and any construction activities that would be required to adaptively reuse the proposed buildings for County purposes. Under Scenario 2, although additional construction efforts would be needed to rehabilitate the buildings, less demolition would occur and overall, construction phases would be similar to the Project. It is assumed for this scenario that the maximum daily construction workers and equipment that would be utilized by phase during construction would be the same as analyzed for the proposed Project. Operation of the Adaptive Reuse/Reduced Project Alternative Scenario 1 would be reduced as the number of County staff that would be relocated to the Project Site would be ~~1,651~~ 933 persons, which would be less than the approximately 3,000 County-budgeted positions assumed under the proposed Project.⁶ Therefore, operations under Scenario 1 would be less than under the Project, and impacts would be less than significant. Operation of Scenario 2 would relocate 3,000 County-budgeted positions assumed under the Project. Therefore, impacts under Scenario 2 would be

⁶ The remaining employees that would not move to the Project Site under this alternative would still require energy to operate at their existing locations and for transportation. However, as the emissions are part of the baseline, they are not considered as part of this analysis.

similar to the Project. Similar to the Project, ~~the Adaptive Reuse/Reduced Project Alternative Scenario 2~~ would not cause wasteful, inefficient, or unnecessary consumption of energy, and would not conflict with a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

Greenhouse Gas Emissions

Under the Adaptive Reuse/Reduced Project Alternative Scenario 1, the construction duration and types of phases required would be reduced as compared to the proposed Project as required construction activities would be limited to demolition of the Tertiary Contributors (21 buildings) and Non-Contributors (48 buildings) on the Project Site and any construction activities that would be required to adaptively reuse the proposed buildings for County purposes. Construction phases for Scenario 2 would be similar in that the maximum daily worker and equipment that would be utilized by phase during construction would be the same as analyzed under the Draft EIR. Operation of the Adaptive Reuse/Reduced Project Alternative would be reduced as the number of County staff that would be relocated to the Project Site would be ~~1,651~~ 933 persons, which would be less than the approximately 3,000 County-budgeted positions assumed under the proposed Project. Operation of Scenario 2 would relocate 3,000 County-budgeted positions assumed under the Project.

While the Adaptive Reuse/Reduced Project Alternative Scenario 1 would not include construction of new buildings that would incorporate design features, such as achievement of the LEED Gold standards, the adaptive reuse of the existing buildings on the Project Site would include design features and incorporate characteristics to reduce energy, conserve water, reduce waste generation, and reduce vehicle travel. As Scenario 2 would still construct the new buildings as proposed under the Project, those new buildings would achieve LEED Gold standard. Therefore, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would not conflict any applicable plan, policy, regulation, or recommendation of an agency adopted for the purposes of reducing emissions of GHGs and impacts would be less than significant. However, impacts for Scenario 1 would be greater than those of the proposed Project as GHG reduction strategies would not be achieved to the same extent as the proposed Project. While Scenario 2 would develop the new LEED Gold standard buildings as proposed under the Project, Scenario 2 would still adaptively reuse two Individually Eligible Primary Contributors that would not be updated to the LEED Gold standard. However, as the buildings would no longer be demolished and would be reused, there would be fewer resources used overall under Scenario 2 as compared to the Project. Therefore, impacts for Scenario 2 would be conservatively considered similar to those of the proposed Project.

The combined GHG emissions emitted during construction and operation of the Adaptive Reuse/Reduced Project Alternative Scenario 1 would be reduced due to the reduction in overall construction intensity and the reduction in vehicles trips to and from the Project Site.⁷ However, ~~even~~ with the reduction in vehicles trips, which would result in a corresponding reduction in mobile emissions (the highest source of GHG emissions under the proposed Project), GHG

⁷ The remaining employees that would not move to the Project Site under this alternative would still be making vehicle trips to their existing locations which would generate GHG emissions. However, as the emissions are part of the baseline, they are not considered as part of this analysis.

emissions under the Adaptive Reuse/Reduced Project Alternative Scenario 1 would exceed the SCAQMD interim screening-level threshold as a corresponding ~~45~~ 69 percent reduction in mobile trips would still result in approximately ~~4,192~~ 2,363 CO₂e (compared to the proposed Project's 7,622 CO₂e for mobile emissions alone), which would be ~~more~~ less than the 3,000 CO₂e screening threshold. Similar to the proposed Project, the Adaptive Reuse/Reduced Project Alternative Scenario 1 would still implement Mitigation Measures MM-AIR-3 through MM-AIR-5. Implementation of these mitigation measures would further reduce GHG emissions; ~~however, emissions would continue to exceed the SCAQMD interim screening level threshold~~, and impacts under the Adaptive Reuse/Reduced Project Alternative Scenario 1 would be significant and unavoidable less than significant. Impacts related to GHG emissions for Scenario 1 would be less than those of the proposed Project.

Operation of Scenario 2 would relocate 3,000 County-budgeted positions assumed under the Project. Therefore, there would be no reduction in vehicle trips and mobile emissions. Even with implementation of Mitigation Measures MM-AIR-3 through MM-AIR-5, impacts under Scenario 2 would be significant and unavoidable, similar to the proposed Project.

Hazards and Hazardous Materials

Under the Adaptive Reuse/Reduced Project Alternative Scenario 1, the construction duration and types of phases required would be reduced as compared to the proposed Project as required construction activities would be limited to demolition of the Tertiary Contributors (21 buildings) and Non-Contributors (48 buildings) on the Project Site and any construction activities that would be required to adaptively reuse the proposed buildings for County purposes. Construction phases for Scenario 2 would be similar as those proposed under the Project in that the maximum daily workers and equipment that would be utilized by phase during construction would be the same as analyzed under the Project. Operation of the Adaptive Reuse/Reduced Project Alternative Scenario 1 would be reduced as the number of County staff that would be relocated to the Project Site would be ~~1,651~~ 933 persons, which would be less than the approximately 3,000 County-budgeted positions assumed under the proposed Project. Operation of Scenario 2 would relocate 3,000 County-budgeted positions assumed under the Project.

As with the Project, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would have no impacts related to proximity to an airport land use plan, an adopted emergency response plan or evacuation plan, and wildland fires. In addition, similar to the proposed Project, with compliance with regulations, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant. However, employees under Scenario 1 would be relocated onto the Project Site (in new facilities) and would be in immediate proximity to buildings that pose a substantial safety concern from the hazardous materials potentially within the remaining buildings and from the potential hazards of dilapidated buildings, which could potentially lead to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Under this Adaptive Reuse/Reduced Project Alternative Scenario 1, only Tertiary and Non-Contributors would be demolished. There would still be other remaining Primary and Secondary Buildings that would be mothballed but still structurally unstable. Those buildings could contain hazardous materials that

would remain on the Project Site and could pose an environmental hazard and threat to public health and safety. With regulatory compliance, impacts under Scenario 1 would be less than significant, but would be greater than the proposed Project.

Under Scenario 2, 103 buildings, structures, and features would be demolished. Two additional Individually Eligible Primary Contributors would be adaptively reused, one Individually Eligible Primary Contributor would be restored and repainted, and one Individually Eligible Primary Contributor would be mothballed for future County uses. Therefore, employees would be located onto the Project Site into the new construction and into the adaptively reused buildings. The employees under Scenario 2 would not be located in immediate proximity to buildings that pose a substantial safety concern from the hazardous materials potentially within any remaining buildings and from the potential hazards of dilapidated buildings. Therefore, impacts under Scenario 2 would be less than significant, but would be similar to those of the proposed Project.

Under the Adaptive Reuse/Reduced Project Alternative (both scenarios), nearby schools would not be exposed to hazardous materials, through compliance with regulations, and impacts would be less than significant.

As described in Section 3.7, *Hazards and Hazardous Materials*, the part of the Project Site known as Area 10 is listed in Government Code Section 65962.5 as a hazardous materials site due to soil and groundwater from leaking underground storage tanks (USTs) that have since been removed from the site. Other areas within the Project Site previously had USTs and/or other chemical uses that have resulted in residual levels of chemicals in soil. As discussed further above, the buildings that would be either adaptively reused or mothballed on the Project Site (i.e., all Primary and Secondary Contributors) are located in the approximate area that would be remediated under the Project. As such, it is assumed that under ~~this alternative~~ Scenario 1, remediation would not be attempted. However, under the Adaptive Reuse/Reduced Project Alternative Scenario 1, all Tertiary Contributors (21 buildings) and Non-Contributors (48 buildings) on the Project Site would be demolished. While remediation would not occur under ~~this alternative~~ Scenario 1, it is possible that contaminated soil would be encountered during demolition and minor excavation activities, which would be a significant impact. Similar to the proposed Project, the Adaptive Reuse/Reduced Project Alternative Scenario 1 would implement Mitigation Measures MM-HAZ-1 and HAZ-2 as necessary, which would serve to reduce potential impacts. However, as remediation would not occur and the contamination would persist under ~~this alternative~~ Scenario 1, impacts would remain significant and unavoidable. As remediation would occur under Scenario 2, impacts would be less than significant with mitigation, and impacts would be the same as those under the proposed Project.

Hydrology and Water Quality

Under the Adaptive Reuse/Reduced Project Alternative Scenario 1, the construction duration and types of phases required would be reduced as compared to the proposed Project as required construction activities would be limited to demolition of the Tertiary Contributors (21 buildings) and Non-Contributors (48 buildings) on the Project Site and any construction activities that would be required to adaptively reuse the proposed buildings for County purposes. Under Scenario 2, although additional construction efforts would be needed to rehabilitate the buildings, less

demolition would occur and overall, construction phases would be similar. It is assumed for this scenario that the maximum daily construction workers and equipment that would be utilized by phase during construction would be the same as analyzed for the proposed Project. Operation of the Adaptive Reuse/Reduced Project Alternative would be reduced as the number of County staff that would be relocated to the Project Site would be ~~1,651~~ 933 persons, which would be less than the approximately 3,000 County-budgeted positions assumed under the proposed Project. Operation of Scenario 2 would relocate 3,000 County-budgeted positions assumed under the Project. Therefore, impacts under Scenario 2 would be similar to the Project. As described above, since the Adaptive Reuse/Reduced Project Alternative (both scenarios) would demolish a reduced number of buildings as compared to the proposed Project, the resulting impervious surfaces on the Project Site would be reduced as compared to the proposed Project. However, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would have a comparably similar amount of impervious surfaces when compared to current conditions.

Similar to the proposed Project, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would have no impacts related to consistency with implementation of a water quality control plan or sustainable groundwater management plan. As discussed above, under Scenario 1, since the buildings that would be adaptively reused or mothballed on the Project Site are located in the approximate area that would be remediated under the proposed Project, it is assumed that under this alternative remediation would not be attempted. As contaminated groundwater would persist under ~~this alternative Scenario 1~~, impacts related to violating water quality standards or waste discharge requirements would be significant and unavoidable and would be greater than those of the proposed Project since completion of the soil remediation would not occur. As Scenario 2 would include remediation, impacts would be less than significant and the same as those of the proposed Project.

As construction intensity and the number of employees on the Project Site would be reduced under the Adaptive Reuse/Reduced Project Alternative Scenario 1 compared to those of the proposed Project, the Adaptive Reuse/Reduced Project Alternative Scenario 1 would not substantially deplete groundwater supplies and recharge; substantially alter drainage patterns, resulting in substantial erosion, siltation, flooding, and/or creation of runoff water which would exceed the capacity of existing or planned stormwater drainage systems; or risk release of pollutants due to project inundation. Impacts would be less than significant and less than those of the proposed Project. Under Scenario 2, impacts would still be less than significant and similar to those of the proposed Project.

Land Use and Planning

Under the Adaptive Reuse/Reduced Project Alternative Scenario 1, the construction duration and types of phases required would be reduced as compared to the proposed Project as required construction activities would be limited to demolition of the Tertiary Contributors (21 buildings) and Non-Contributors (48 buildings) on the Project Site and any construction activities that would be required to adaptively reuse the proposed buildings for County purposes. Under Scenario 2, although additional construction efforts would be needed to rehabilitate the buildings, less demolition would occur and overall, construction phases would be similar. It is assumed for this scenario that the maximum daily construction workers and equipment that would be utilized by

phase during construction would be the same as analyzed for the proposed Project. Operation of the Adaptive Reuse/Reduced Project Alternative Scenario 1 would be reduced as the number of County staff that would be relocated to the Project Site would be ~~1,651~~ 933 persons, which would be less than the approximately 3,000 County-budgeted positions assumed under the proposed Project. Operation of Scenario 2 would relocate 3,000 County-budgeted positions assumed under the Project.

Similar to the proposed Project, the development of the proposed uses on the Project Site under the Adaptive Reuse/Reduced Project Alternative (both scenarios) would remove fences and other barriers to the adaptively reused buildings on the Project Site and open space areas, which would allow for connectivity throughout the Project Site and into the surrounding Project vicinity. However, as the Adaptive Reuse/Reduced Project Alternative Scenario 1 would demolish fewer of the deteriorating buildings on the Project Site, the Project Site would be less accessible for the public under the Adaptive Reuse/Reduced Project Alternative as compared to the proposed Project as the remaining buildings would remain blocked off and inaccessible by the public. Therefore, while impacts would be less than significant under the Adaptive Reuse/Reduced Project Alternative Scenario 1, they would be slightly greater than those of the proposed Project due to the reduced connectivity and public access provided under the Adaptive Reuse/Reduced Project Alternative as compared to the Project. Under Scenario 2, the new development as proposed under the Project would still occur, as well as the adaptive reuse of two Individually Eligible Primary Contributors. All buildings, except for LACO No. 1302 which would be mothballed, would be accessible by the employees on the Project Site. Therefore, impacts would be less than significant under Scenario 2 and would be less than impacts under the Project.

The Adaptive Reuse/Reduced Project Alternative Scenario 1 would include the same uses as those under the proposed Project, however, these uses would be included in adaptively reused buildings on the Project Site and not newly constructed buildings. As such, while the Adaptive Reuse/Reduced Project Alternative Scenario 1 would be consistent with some policies, procedures, and standards set forth in the County General Plan, this alternative would not achieve consistency with as many of the County General Plan policies which emphasize sustainable design techniques buildings would not constitute new County development that would be required to be built to LEED Gold standards. Scenario 2 would be consistent with the same policies and would achieve consistency with the County General Plan policies that emphasize sustainable design technique buildings. In addition, while provided for information purposes, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would be consistent with the City of Downey General Plan and Municipal Code. Furthermore, as the Adaptive Reuse/Reduced Project Alternative Scenario 1 would adaptively reuse existing buildings on the Project Site, this alternative would be more consistent with the policies of the SP 88-1A as it relates to building setbacks, height limitations, and landscaped buffers as compared to the proposed Project. Scenario 2 would adaptively reuse buildings but would also construct the new buildings as proposed under the Project, which may not be consistent with all policies of the SP 88-1A. Based on the above, impacts for both scenarios related to consistency with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be similar to those of the proposed Project.

Noise

Under the Adaptive Reuse/Reduced Project Alternative Scenario 1, the construction duration and types of phases required would be reduced as compared to the proposed Project as required construction activities would be limited to demolition of the Tertiary Contributors (21 buildings) and Non-Contributors (48 buildings) on the Project Site and any construction activities that would be required to adaptively reuse the proposed buildings for County purposes. Under Scenario 2, although additional construction efforts would be needed to rehabilitate the buildings, less demolition would occur and overall, construction phases would be similar. It is assumed for this scenario that the maximum daily construction workers and equipment that would be utilized by phase during construction would be the same as analyzed for the proposed Project. Operation of the Adaptive Reuse/Reduced Project Alternative Scenario 1 would be reduced as the number of County staff that would be relocated to the Project Site would be ~~1,651~~ 933 persons, which would be less than the approximately 3,000 County-budgeted positions assumed under the proposed Project. Operation of Scenario 2 would relocate 3,000 County-budgeted positions assumed under the Project.

With regard to construction noise impacts, construction of the Adaptive Reuse/Reduced Project Alternative Scenario 1 would not occur in the same footprint in the northeastern portion of the Project Site. While construction of the Adaptive Reuse/Reduced Project Alternative Scenario 1 would not require the same phases of construction, on a daily basis, maximum construction equipment is conservatively assumed to be similar to the proposed Project for ~~this alternative Scenario 1~~. While demolition would be restricted to Tertiary Contributors and Non-Contributors, there would still be demolition and infrastructure improvements throughout the Project Site, similar to under the Project. As such, noise levels at R1, R2, R3, R4, and R7 would be relatively similar to the noise levels under the proposed Project and impacts at those receptors would be significant. Noise levels at R5 and R6 would be reduced compared to the proposed Project due to the reduced amount of construction and demolition surrounding those respective receptors. Therefore, as with the proposed project, the Adaptive Reuse/Reduced Project Alternative Scenario 1 would still be required to implement Mitigation Measures MM-NOI-1 through NOI-5, which would serve to reduce noise impacts from construction of the Adaptive Reuse/Reduced Project Alternative. With implementation of these mitigation measures, significant construction noise impacts under Scenario 1 would be reduced to less than significant, and impacts would be less than those of the proposed Project due to the reduction in construction phases and duration. Scenario 2 would include adaptive reuse, mothballing, and the new construction as proposed under the Project. Therefore, on a daily basis, maximum construction equipment would be similar to the proposed Project for Scenario 2. As such, noise levels at the sensitive receptors under the Scenario 2, as with the Project, would be significant. Similar to the Project, Scenario 2 would implement Mitigation Measures MM-NOI-1 through NOI-5 to reduce noise impacts to all receptors impacted by construction of Scenario 1. With implementation of these mitigation measures, construction noise impacts would be reduced to less than significant at all receptors under Scenario 2. Impacts would be similar to those of the proposed Project.

As discussed above, the number of County staff that would be relocated to the Project Site would be ~~1,651~~ 933 persons under the Adaptive Reuse/Reduced Project Alternative Scenario 1, which would be less than the approximately 3,000 County-budgeted positions assumed under the

proposed Project. As such, the operational noise impacts related to traffic conditions under the Adaptive Reuse/Reduced Project Alternative Scenario 1 would be lower than the proposed Project and would be less than significant. Operation of Scenario 2 would relocate 3,000 County-budgeted positions assumed under the Project. Therefore, operational noise impacts under Scenario 2 would be similar to the Project. Similar to the proposed Project, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would have significant impacts due to the on-site stationary equipment (e.g., air conditioners, fans, generators) to off-site receptors. With implementation of Mitigation Measures MM-NOI-5 and NOI-6, operational noise impacts would be reduced to less than significant. Impacts under Scenario 1 would be less than those of the proposed Project, and impacts under Scenario 2 would be greater than those of the proposed Project due to the increased on-site stationary equipment on the Project Site (from two additional operational buildings that are adaptively reused).

With regard to construction vibration impacts related to structural damage, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would include construction activities that would have the potential to generate low levels of groundborne vibration, similar to the proposed Project. Under Scenario 1, these construction activities could occur in proximity to the fragile buildings located on the Project Site. Under Scenario 2, construction activities would be reduced but would still occur in proximity to buildings that would be retained, adaptively reused, or mothballed. As such, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would include implementation of mitigation measure MM-NOI-7, which would reduce potential vibration impacts related to structural damage during construction of the Adaptive Reuse/Reduced Project Alternative. Therefore, impacts under this alternative (both scenarios) would be less than significant with mitigation and similar to those of the proposed Project.

Under the proposed Project, even after implementation of Mitigation Measures MM-NOI-8 and NOI-9, impacts from construction vibration related to human annoyance would be significant and unavoidable with regard to the six residences located less than 50 feet of the Project Site. Under the Adaptive Reuse/Reduced Project Alternative Scenario 1, construction activities would be limited to demolition of the Tertiary Contributors (21 buildings) and Non-Contributors (48 buildings) on the Project Site and any construction activities that would be required to adaptively reuse the proposed buildings for County purposes. Demolition of the surface parking lot located adjacent to the residential uses to the east of the Project Site would not occur. This would move construction activities away from the potentially impacted residences located less than 50 feet from the Project Site. Construction activities would be over 400 feet from the nearest residential buildings, which would be located to the east of the Project Site. Therefore, the Adaptive Reuse/Reduced Project Alternative Scenario 1 would eliminate the significant and unavoidable construction vibration impacts related to human annoyance. The Adaptive Reuse/Reduced Project Alternative Scenario 1 would not need to implement Mitigation Measures MM-NOI-8 and NOI-9. Construction vibration impacts would be less than significant and less than those of the proposed Project. Under Scenario 2, the new development, including the demolition of the surface parking lot for the ISD/Probation Parking Structure, proposed under the Project would similarly be constructed in the Development Area. Therefore, even with implementation of Mitigation Measures MM-NOI-8 and NOI-9, construction vibration impacts would be significant and unavoidable and similar to those of the proposed Project.

Operational vibration impacts under the Adaptive Reuse/Reduced Project Alternative Scenario 1 would be lower than the proposed Project due to the reduction in operational traffic trips. As such, there would be no operational vibration impacts and impacts would be less than those of the proposed Project. As operational characteristics under Scenario 2 would be similar to those of the proposed Project, there would be no operational vibration impacts, and impacts would be similar to those of the proposed Project.

The Adaptive Reuse/Reduced Project Alternative (both scenarios), similar to the Project, would have the potential to utilize the same haul route (Imperial Highway) as four related projects, which would result in significant cumulative off-site construction noise impacts. Similar to the Project, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would implement Mitigation Measure MM-NOI-10 to reduce cumulative on-site construction impacts to less than significant levels. The Adaptive Reuse/Reduced Project Alternative (both scenarios) would implement Mitigation Measure MM-NOI-11 to reduce potentially cumulative hauling noise impacts associated with the Rancho Los Amigos National Rehabilitation Center Consolidation project. However, in the event that hauling activities for the three other related projects occur concurrently with hauling required under the alternative, impacts would still be significant and unavoidable under the Adaptive Reuse/Reduced Project Alternative (both scenarios). However, impacts under Scenario 1 would be less than those of the proposed Project due to the reduction in construction intensity and duration. Impacts under Scenario 2 would be similar to those of the proposed Project.

As discussed above, the significant and unavoidable construction vibration impacts related to human annoyance would be avoided under the Adaptive Reuse/Reduced Project Alternative Scenario 1. As such, the significant and unavoidable cumulative construction vibration impacts related to human annoyance would also be avoided under this alternative. Under Scenario 2, construction vibration impacts from construction vibration related to human annoyance would remain significant and unavoidable with implementation of Mitigation Measures MM-NOI-8 and NOI-9. Impacts under Scenario 2 would be similar as those under the proposed Project.

Similar to the proposed Project, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would not be located within the vicinity of a private airstrip or an airport land use plan and no impacts would occur under the Adaptive Reuse/Reduced Project Alternative. Impacts would be similar to those of the proposed Project.

Transportation

Under the Adaptive Reuse/Reduced Project Alternative Scenario 1, the construction duration and types of phases required would be reduced as compared to the proposed Project as required construction activities would be limited to demolition of the Tertiary Contributors (21 buildings) and Non-Contributors (48 buildings) on the Project Site and any construction activities that would be required to adaptively reuse the proposed buildings for County purposes. Under Scenario 2, although additional construction efforts would be needed to rehabilitate the buildings, less demolition would occur and overall, construction phases would be similar. It is assumed for this scenario that the maximum daily construction workers and equipment that would be utilized by phase during construction would be the same as analyzed for the proposed Project. Operation of

the Adaptive Reuse/Reduced Project Alternative would be reduced as the number of County staff that would be relocated to the Project Site would be ~~1,654~~ 933 persons, which would be less than the approximately 3,000 County-budgeted positions assumed under the proposed Project. Operation of Scenario 2 would relocate 3,000 County-budgeted positions assumed under the Project. Therefore, operational impacts under Scenario 2 would be similar to the Project.

While overall construction intensity and duration would be reduced for Scenario 1, as described above, which would reduce the total number of construction workers for the duration of construction, it is conservatively assumed that the number of daily construction workers and haul truck trips would be similar under the Adaptive Reuse/Reduced Project Alternative Scenario 1 as with the proposed Project. Similarly, for Scenario 2, construction phases would be similar in that the maximum daily worker and equipment that would be utilized by phase during construction would be the same as analyzed under the Draft EIR. As such, construction traffic impacts under both the Adaptive Reuse/Reduced Project Alternative (both scenarios) and proposed Project would be significant. Implementation of Mitigation Measure MM-TRAF-1 prior to and during construction activities would reduce impacts to less than significant. Construction impacts under Adaptive Reuse/Reduced Project Alternative (both scenarios) would be less than those of the proposed Project.

As analyzed in Section 3.11, *Transportation*, under the proposed Project, traffic impacts would occur under the “Existing with Project” and “Future with Project” traffic scenarios (Intersection Nos. 3, 7, 15, 16, 17, and 20), with the exception of the impact at Intersection No. 17 (Arizona Avenue/Gardendale Street), which would only occur in the “Future with Project” traffic scenario. Under the Adaptive Reuse/Reduced Project Alternative Scenario 1, the number of County staff that would be relocated to the Project Site would be ~~1,654~~ 933 persons, which would be a reduction from the approximately 3,000 County-budgeted positions assumed under the proposed Project. This would result in a corresponding reduction in operational traffic (Linscott, Law & Greenspan, 2019).⁸ As discussed in Appendix K-2, due to the reduction in operational traffic, the Adaptive Reuse/Reduced Project Alternative Scenario 1 would result in significant impacts at Intersection Nos. 3, 7, 16, 17, and 20, and would not have an impact at Intersection No. 15 as under the proposed Project. With implementation of Mitigation Measures MM-TRAF-1 and TRAF-2, impacts at Intersection Nos. 3 and 16 would be eliminated and impacts would be less than significant with mitigation. Impacts would remain at Intersection Nos. 7, 17, and 20. The impact at Intersection No. 7 would remain significant and unavoidable as mitigation would be infeasible as there is insufficient side street volume to warrant the installation of a traffic signal. The impact at intersection No. 17 would remain significant and unavoidable similarly due to infeasible mitigation through the installation of a traffic signal. The impact at Intersection No. 20 would remain significant and unavoidable as there are no reasonable or feasible mitigation measures available at this completely built-out intersection. Thus, similar to the proposed Project, the Adaptive Reuse/Reduced Project Alternative Scenario 1 would have a significant and unavoidable operational traffic impact. However, impacts would be less than those of the Project. Operation of Scenario 2 would relocate 3,000 County-budgeted positions assumed under the

⁸ The remaining employees that would not move to the Project Site under this alternative would still be generating trips to their existing offices. However, as the emissions are part of the baseline, they are not considered as part of this analysis.

Project. Therefore, there would be no reduction in trips for Scenario 2 as compared to the Project. Therefore, under Scenario 2, the same traffic impacts as under the proposed Project would occur, and impacts would be similar as those of the Project.

In regard to impacts on transit, bicycle, and pedestrian facilities, parking for construction workers would be provided within the Project Site by the County, and street parking would not be permitted. Additionally, similar to the Project, construction of the Adaptive Reuse/Reduced Project Alternative (both scenarios) would not require the closure of any vehicle travel lanes adjacent to the Project Site (e.g., Imperial Highway and Gardendale Street). Additionally, the ~~Reduced Demolition Alternative~~ alternative (both scenarios) would be required to develop a construction traffic management plan (CTMP) to alleviate any potential construction period impacts. The CTMP includes traffic controls and would include safety precautions for pedestrians and bicyclists; therefore, impacts to public transit, bicycle, and pedestrian facilities would be less than significant. Similar to the Project, under the Adaptive Reuse/Reduced Project Alternative (both scenarios), no existing or planned bicycle or pedestrian facilities would be removed or prevented from being constructed or operated by the Project. Therefore, impacts would be less than significant and would be similar to that of the Project.

Since the County has not yet formally adopted its updated transportation significance thresholds or its updated transportation impact analysis procedures to implement SB 743, delay and LOS are the measures used in this EIR to determine the significance of transportation impacts. As such, no impacts related to CEQA Guidelines section 15064.3, subdivision (b) would occur, and impacts would be similar to the proposed Project. Similar to the proposed Project, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would substantially increase hazards due to a geometric design feature or result in inadequate emergency access, and impacts would be significant. With implementation of Mitigation Measure MM-TRA-1, impacts would be reduced to less than significant and similar to those of the proposed Project.

Tribal Cultural Resources

Under the Adaptive Reuse/Reduced Project Alternative Scenario 1, overall construction intensity and duration would be reduced as compared to the proposed Project due to the reduced number of buildings that would be demolished and new buildings would not be developed under this alternative. Minor excavation is assumed to be required under the Adaptive Reuse/Reduced Project Alternative Scenario 1. As such, ~~similar to the proposed Project~~, there would be no impact under Scenario 1 to tribal cultural resources.

Under Scenario 2, construction phases would be similar in that the maximum daily worker and equipment that would be utilized by phase during construction would be comparable as analyzed under the Draft EIR. Remedial activities related to the contaminated groundwater plume would occur on the Project Site in the same manner as the Project, following the demolition of LACO No. 1276 (a Secondary Contributor). As Scenario 2 would be constructing the same new development as proposed under the Project, excavation levels would be similar as under the Project. Therefore, impacts under Scenario 2 would be similar to the proposed Project, and there would be no impact to tribal cultural resources.

Utilities and Service Systems

Under the Adaptive Reuse/Reduced Project Alternative Scenario 1, the construction duration and types of phases required would be reduced as compared to the proposed Project as required construction activities would be limited to demolition of the Tertiary Contributors (21 buildings) and Non-Contributors (48 buildings) on the Project Site and any construction activities that would be required to adaptively reuse the proposed buildings for County purposes. Under Scenario 2, although additional construction efforts would be needed to rehabilitate the buildings, less demolition would occur and overall, construction phases would be similar. It is assumed for this scenario that the maximum daily construction workers and equipment that would be utilized by phase during construction would be the same as analyzed for the proposed Project. Operation of the Adaptive Reuse/Reduced Project Alternative would be reduced as the number of County staff that would be relocated to the Project Site would be ~~4,654~~ 933 persons, which would be less than the approximately 3,000 County-budgeted positions assumed under the proposed Project. As such, water, wastewater and solid waste generation under both construction and operation of the Adaptive Reuse/Reduced Project Alternative Scenario 1 would be reduced as compared the proposed Project.

Under Scenario 2, while the number of employees and level of operation would be the same as under the Project, utility demand is based on square footage and land uses rather than the number of employees. As shown in Table 4-9, Scenario 2, which would include the adaptively reused buildings and the new construction, would result in an increase in potable water demand of an estimated 63.9 acre feet per year (AFY) for regular consumptive use and 125.8 AFY in non-potable use (as compared to 47.4 AFY and 114.7 AFY for the proposed Project). The entire Project Site, which would include areas outside of the Development Area that would require hydroseeding and irrigation, would experience a net increase of 146.9 AFY in non-potable water as no potable water would be used for hydroseeding and open space irrigation. While it is assumed in the calculation below that irrigation demand would be the same as the proposed Project, as Scenario 2 would demolish existing buildings to construct the new buildings, there would be less open space that would require irrigation and landscaping. Therefore, irrigation demand would be less than stated for the proposed Project, and overall, water demand would be lower than presented in Table 4-9. As shown in Tables 3.13-1 through 3.13-3 in Section 3.13, *Utilities and Service Systems*, of the Draft EIR, the City of Downey has available water supply through 2040 to accommodate 146.9 AFY of non-potable water and 63.9 AFY of potable water for Scenario 2. Therefore, the City of Downey has sufficient water supply to accommodate Scenario 2 for normal year, single dry year, and multiple dry year conditions through 2040.

Therefore, while impacts under Scenario 2 on water demand would be greater than under the Project, impacts would remain less than significant.

TABLE 4-9
ESTIMATE OF ALTERNATIVE 4 SCENARIO 2'S AVERAGE FUTURE WATER DEMAND

<u>Water Demand</u>	<u>Demand (gpm)</u>	<u>Indoor Demand (afy)</u>	<u>Irrigation Peak Demand (afy)</u>	<u>Near-Term Irrigation Demand (afy)</u>	<u>Long-Term Average Irrigation Demand (afy)</u>	<u>Non-Potable Demand (afy)</u>	<u>Potable Demand (afy)</u>
<u>County Office Building</u>	<u>22</u>	<u>9.5</u>	<u>==</u>	<u>==</u>	<u>==</u>	<u>2.9</u>	<u>6.6</u>
<u>Parking Structure</u>	<u>0</u>	<u>0</u>	<u>==</u>	<u>==</u>	<u>==</u>	<u>0</u>	<u>0</u>
<u>Probation Building</u>	<u>101</u>	<u>43.6</u>	<u>==</u>	<u>==</u>	<u>==</u>	<u>28.8</u>	<u>14.8</u>
<u>ISD Building</u>	<u>177</u>	<u>76.5</u>	<u>==</u>	<u>==</u>	<u>==</u>	<u>50.5</u>	<u>26.0</u>
<u>Adaptively Reused Buildings</u>	<u>21</u>	<u>48.7</u>	<u>==</u>	<u>==</u>	<u>==</u>	<u>32.2</u>	<u>16.5</u>
<u>Irrigation Demand</u>	<u>35</u>	<u>==</u>	<u>18.8</u>	<u>11.4</u>	<u>11.4</u>	<u>11.4</u>	<u>==</u>
<u>Development Area Total</u>	<u>356</u>	<u>178.3</u>	<u>18.8</u>	<u>11.4</u>	<u>11.4</u>	<u>125.8</u>	<u>63.9</u>
<u>Hydroseeding</u>	<u>165</u>	<u>==</u>	<u>88.7</u>	<u>53.6</u>	<u>==</u>	<u>==</u>	<u>==</u>
<u>Open Space Irrigation</u>	<u>65</u>	<u>==</u>	<u>34.9</u>	<u>21.1</u>	<u>21.1</u>	<u>21.1</u>	<u>==</u>
<u>Project Site Total</u>	<u>586</u>	<u>178.3</u>	<u>142.4</u>	<u>86.1</u>	<u>32.5</u>	<u>146.9</u>	<u>63.9</u>

SOURCE: Todd Groundwater, 2018; ESA, 2020.

In regard to Scenario 2's operational impact on wastewater, water demand can be approximately translated to wastewater flows. Therefore, the 189.7 AFY of total water demand (potable and non-potable) is considered to be a conservative estimate for wastewater generation as this amount includes irrigation. The 189.7 AFY of water demand translates into 169,241 gallons per day (gpd) or 0.169 million gpd (mgd) (as compared to 0.164 mgd for the proposed Project). As stated on page 3.13-12, the Joint Water Pollution Control Plant (JWPCP) has the capacity to treat up to 675 mgd of primary, secondary, and tertiary wastewater. Scenario 2 would conservatively generate 0.169 mgd of wastewater, or approximately 0.025 percent of JWPCP's capacity of 675 mgd of primary, secondary, and tertiary wastewater and 0.065 percent of JWPCP's current average flow of 260 mgd. Therefore, JWPCP currently has the capacity to accommodate the wastewater generated under Scenario 2. Therefore, wastewater impacts under Scenario 2 would be greater than under the Project, but would be less than significant.

In regard to Scenario 2's construction impact on solid waste, as there would be fewer buildings demolished, there would be less construction solid waste generated under Scenario 2 as compared to the proposed Project. In regard to Scenario 2's operational impact on solid waste, while Scenario 2 would house 3,000 employees, similar to the Project, there is potential for increased operational solid waste due to the increased square footage of the development on the Project Site. As shown in **Table 4-10**, operation of Alternative 4 Scenario 2 (without diversion) would generate approximately 764 tons of solid waste per year, which would account for 0.000716 percent of the remaining capacity of 106.8 million tons at the Frank R. Bowerman Sanitary Landfill (as compared to 0.000677 percent for the proposed Project). However, accounting for compliance with AB 341, which requires a 75 percent diversion rate, Scenario 2 is expected to

contribute approximately 191 tons per year to landfills in the City, which would account for 0.000179 percent of the total remaining capacity at Frank R. Bowerman Sanitary Landfill.

Therefore, solid waste impacts under Scenario 2 would be greater than under the Project, but would be less than significant.

In conclusion, operational impacts regarding utilities under Scenario 2 would be greater than the Project, but would remain less than significant.

**TABLE 4-10
ESTIMATED OPERATIONAL SOLID WASTE GENERATION UNDER ALTERNATIVE 4 SCENARIO 2**

<u>Land Use</u>	<u>Quantity (sf)</u>	<u>Daily Generation Factor^a</u>	<u>Solid Waste Generation (lbs/day)</u>	<u>Solid Waste Generation (tons/year)</u>
<u>Proposed New Uses</u>				
<u>Internal Services Department</u>	<u>370,000</u>	<u>6 lbs/ksf/day^a</u>	<u>2,220</u>	<u>405.15</u>
<u>Probation Department</u>	<u>220,000</u>	<u>6 lbs/ksf/day^a</u>	<u>1,320</u>	<u>240.9</u>
<u>County Office Building</u>	<u>60,000</u>	<u>6 lbs/ksf/day^a</u>	<u>360</u>	<u>65.7</u>
<u>Adaptively Reused Buildings</u>	<u>47,983</u>	<u>6 lbs/ksf/day^a</u>	<u>288</u>	<u>52.54</u>
<u>Proposed Total^b</u>		<u>==</u>	<u>4,188</u>	<u>764</u>
<u>Net Increase (pre-diversion)^c</u>	<u>==</u>	<u>==</u>	<u>4,188</u>	<u>764</u>
<u>Net Increase (post-diversion)^d</u>	<u>==</u>	<u>==</u>	<u>1,047</u>	<u>191</u>

lb = pounds; sf = square feet; ksf = thousand square feet

^a Generation factors provided by CalRecycle, 2016.

^b Totals may not add up due to rounding.

^c LACO No. 1100 is currently operational on the Project Site and would not be affected by the Project. Operation of LACO No. 1100 would not be affected by Project operation, and would not account for a net gain in solid waste at the Project Site. Therefore, it is not accounted for as part of the existing solid waste generation. As the remainder of the buildings on the Project Site are non-operational, there will be no existing solid waste generation.

^d Based on an anticipated diversion rate of 75 percent by 2020 pursuant to AB 341.

SOURCE: ESA, 2020.

Similar to the proposed Project, under the Adaptive Reuse/Reduced Project Alternative (both scenarios), new water and sewer conveyance infrastructure would be necessary to serve the alternative. All lines would be connected to the City of Downey's water lines to provide a public combined water system. However, similar to the Project, none of the new or expanded facilities would result in significant impacts. Therefore, impacts would be less than significant under both scenarios.

The Adaptive Reuse/Reduced Project Alternative (both scenarios) would require the installation of the same telecommunications equipment and system as required by the proposed Project. The provision for telecommunications would be confirmed by the Design Builder during design, and the Design Builder would be required to coordinate with Frontier, as the service provider, to ensure that impacts would be less than significant. Therefore, impacts under the Adaptive

Reuse/Reduced Project Alternative (both scenarios) would be similar to the Project and would be less than significant.

Relationship of the Adaptive Reuse/Reduced Project Alternative to Project Objectives

The Adaptive Reuse/Reduced Project Alternative (both scenarios) would retain a larger number of Contributors within the District than the proposed Project, but Scenario 1 would reduce the number of County staff that would be relocated to the Project Site. Scenario 2 would retain the same number of County staff that would be relocated to the Project Site as under the Project. The Adaptive Reuse/Reduced Project Alternative (both scenarios) would meet a portion of the identified Project Objectives, but to a lesser extent than the proposed Project.

The Adaptive Reuse/Reduced Project Alternative Scenario 1 would partially meet the Project Objective relating to housing the existing and future administrative and functional needs of the County's ISD and Probation Department headquarters as some of the County uses would be housed on the Project Site. Scenario 2 would meet this Project Objective to a similar extent as the Project since 3,000 employees would be housed on the Project Site. Similarly, this alternative Scenario 1 would partially meet the Project Objective to allow for the construction of facilities that would allow the County to provide superior services through proximate and efficient inter-departmental and cross-sector collaboration. Scenario 2 would achieve this Project Objective as it would include the new construction on the Project Site that would allow proximate and efficient inter-departmental and cross-sector collaboration. Similar to the other alternatives, the Adaptive Reuse/Reduced Project Alternative Scenario 1 would partially meet the Project Objectives to develop County facilities that meet current seismic performance standards while some of the seismically unsafe buildings would be demolished. However, the mothballed buildings would not be brought up to current seismic codes. Under Scenario 2, the new buildings, adaptively reused buildings, and restored Water Tower would meet current seismic performance standards. One building would be mothballed under Scenario 2 and would not be brought up to current seismic code. The Adaptive Reuse/Reduced Project Alternative Scenario 1 would also partially meet the objective to avoid or minimize land acquisition, entitlement, or other siting costs by prioritizing the reuse of County-owned property. While some uses would still be brought onto the Project Site within existing buildings, several employees cited within Table 2-2 would remain off-site. Therefore, this objective would not be met to the same extent as the Project. Scenario 2 would fully meet this objective as it would reuse County-owned property and consolidate 3,000 County employees to the Project Site.

Additionally, this alternative Scenario 1 would not develop County facilities that demonstrate the County's commitment to sustainability as no new construction would occur to allow buildings to be built to LEED Gold standard. Scenario 2 would develop new County facilities that would be LEED Gold standard; however, the adaptively reused buildings would not be brought up to the same LEED Gold standard. However, as the buildings would no longer be demolished and would be reused, there would be fewer resources used overall under Scenario 2 as compared to the Project. Therefore, Scenario 2 would only partially meet that objective. Furthermore, similar to the other alternatives, the Adaptive Reuse/Reduced Project Alternative Scenario 1 would not meet Project Objectives related to developing County facilities in a safe environment to the same

extent as the Project as the alternative would bring employees onto the Project Site that would still contain deteriorating buildings. Under Scenario 2, new County facilities would be developed in a safe environment as the deteriorating buildings on the Project Site would be demolished for new construction, adaptively reused to house County uses, or mothballed for future County uses. The alternative (both scenarios) would provide proximity to other surrounding County facilities as the County uses would be brought onto the quadrants of the Project Site that are closed to other County uses outside of the Project Site. The alternative (both scenarios) would provide an attractive, uncluttered visible gateway to the South Campus from Imperial Highway as the uses would be lined along Erickson Street which would serve as the main entrance through the Project Site. The Adaptive Reuse/Reduced Project Alternative (both scenarios) would establish a common character and tone for the South Campus as the County uses would be relocated into the adaptively reused buildings. Scenario 2 would achieve that objective to a greater extent than Scenario 1 as the Water Tower would be restored and repainted, and would remain a focal point on the Project Site. Development of the Adaptive Reuse/Reduced Project Alternative Scenario 1 would also partially meet the Project Objective, but to a lesser extent than the proposed Project, to enable the South Campus to complement and readily adapt to potential future projects as multiple buildings would remain on the Project Site and would not be removed but would be adaptively reused and still allow for complementary office buildings closer to the other proximate County uses to the Project Site. Scenario 2 would fully meet this Project Objective as it would create new development and also adaptively reuse two buildings on the Project Site, which would be complementary for other office and administrative uses close to County uses. Similar to the other alternatives, the Adaptive Reuse/Reduced Project Alternative Scenario 1 would not fully eliminate the identified environmental and public health concerns and would not fully recognize unique, culturally important historic elements of the South Campus. Scenario 2 would meet this Project Objective to a greater extent as it would provide remediation on the Project Site, similar to the Project, and would demolish the deteriorating buildings that currently pose a substantial safety concern from hazardous materials potentially within the remaining buildings.

However, the Adaptive Reuse/Reduced Project Alternative (both scenarios) would meet the Project Objective to fulfill the spirit and intent of historic preservation, as set forth in the Secretary of the Interior's Standards, by ensuring the proper care and treatment of the most important historic resources on the South Campus to a greater extent than the proposed Project as more historical buildings would be retained under development of this alternative. Scenario 1 would achieve this Objective to a greater extent than Scenario 2.

4.8.5 Environmentally Superior Alternative

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR, and that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

Selection of an environmentally superior alternative is based on comparison of the alternatives that would reduce or eliminate the significant impacts associated with the proposed Project, and

on a comparison of the remaining environmental impacts of each alternative to the Project's impacts. The comparative impacts of the Project, the No Project, the Partial Preservation Alternative, the Reduced Demolition Alternative, and the Adaptive Reuse/Reduced Project Alternative are summarized in **Table 4-711**.

Of the alternatives analyzed in this Draft EIR, the No Project Alternative would avoid most of the proposed Project's significant environmental effects, including the proposed Project's significant and unavoidable impacts related to shade and shadow impacts; air quality with respect to a cumulatively considerable net increase of NO_x emissions during Project operations; GHG emissions; construction vibration; cumulative construction noise and vibration; and long-term operational traffic impacts. However, the No Project Alternative would not avoid significant and unavoidable impacts related to historical resources due to the potential deterioration of the District over time. In addition, impacts with regard to hazards and hazardous materials and land use and planning would be greater than those of the proposed Project.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that the Adaptive Reuse/Reduced Project Alternative Scenario 1 would be the Environmentally Superior Alternative. The Adaptive Reuse/Reduced Project Alternative Scenario 1 would reduce and eliminate significant and unavoidable impacts related to shade and shadow impacts; air quality with respect to a cumulatively considerable net increase of NO_x emissions during Project operations (with implementation of Project mitigation measures); historic architectural resource impacts (with implementation of Project mitigation measures); construction vibration (with implementation of Project mitigation measures); and cumulative construction vibration (with implementation of Project mitigation measures). While the Partial Preservation Alternative and the Reduced Demolition Alternative would also eliminate some significant and unavoidable impacts, it would not be to the same extent as the Adaptive Reuse/Reduced Project Alternative Scenario 1. The Adaptive Reuse/Reduced Project Alternative Scenario 1 would also reduce a greater number of the Project's less-than-significant impacts (with and without mitigation) compared to the Partial Preservation Alternative and the Reduced Demolition Alternative. The Adaptive Reuse/Reduced Project Alternative Scenario 2 would have similar levels of impacts as under the Project. However, the Adaptive Reuse/Reduced Project Alternative Scenario 2 would reduce impacts to historic architectural resource impacts (which would remain significant and unavoidable with mitigation) and provide more accessibility and connectivity for the Project Site (less than significant). Overall, the Adaptive Reuse/Reduced Project Alternative Scenario 1, when compared to the Partial Preservation Alternative, and the Reduced Demolition Alternative, and Scenario 2 of the Adaptive Reuse/Reduced Project Alternative, would be the Environmentally Superior Alternative. However, the Adaptive Reuse/Reduced Project Alternative Scenario 1 would not satisfy a portion of the Project Objectives and would meet other Objectives to lesser extent than the Project. The Adaptive Reuse/Reduced Project Alternative Scenario 2 would satisfy more, and to a greater extent, Project Objectives than all the other alternatives.

TABLE 4-711
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Impact	Project	No Project	Partial Preservation Alternative		Reduced Demolition Alternative	Adaptive Reuse/Reduced Project Alternative	
			<u>Scenario 1</u>	<u>Scenario 2</u>		<u>Scenario 1</u>	<u>Scenario 2</u>
Aesthetics							
AES-1: Scenic Vista	No Impact	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>
AES-2: Scenic Resources	No Impact	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>
AES-3: Conflict with Zoning	Less than Significant	No Impact (Less)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>	Less than Significant (Similar)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>
AES-3: Visual Character							
Construction	Less than Significant	No Impact (Less)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>	Less than Significant (Similar)	Less than Significant (Similar)	<u>Less than Significant (Less)</u>
Operation	Less than Significant with Mitigation	No Impact (Less)	Less than Significant with Mitigation (Similar)	<u>Less than Significant with Mitigation (Similar)</u>	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Less)	<u>Less than Significant with Mitigation (Less)</u>
AES-4: Light and Glare	Less than Significant	No Impact (Less)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>	Less than Significant (Similar)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>
AES-4: Shade and Shadow	Significant and Unavoidable	No Impact (Less)	Less than Significant (Less)	<u>Less than Significant (Less)</u>	Significant and Unavoidable (Similar)	No Impact (Less)	<u>Less than Significant (Less)</u>
Air Quality							
AIR-1: Conflict with Air Quality Management Plan	Less than Significant	No Impact (Less)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>	Less than Significant (Similar)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>

Impact	Project	No Project	Partial Preservation Alternative		Reduced Demolition Alternative	Adaptive Reuse/Reduced Project Alternative	
			<u>Scenario 1</u>	<u>Scenario 2</u>		<u>Scenario 1</u>	<u>Scenario 2</u>
AIR-2: Cumulatively Considerable Increase of Criteria Pollutant in Nonattainment Area							
Construction	Less than Significant with Mitigation	No Impact (Less)	Less than Significant with Mitigation (Less)	<u>Less than Significant with Mitigation (Less)</u>	Less than Significant with Mitigation (Less)	Less than Significant with Mitigation (Less)	<u>Less than Significant with Mitigation (Less)</u>
Operation	Significant and Unavoidable	No Impact (Less)	Significant and Unavoidable (Similar)	<u>Significant and Unavoidable (Similar)</u>	Significant and Unavoidable (Similar)	Less than Significant with Mitigation (Less)	<u>Significant and Unavoidable (Similar)</u>
AIR-3: Sensitive Receptors Exposure to Pollutant Concentrations							
	Less than Significant with Mitigation	No Impact (Less)	Less than Significant (Less)	<u>Less than Significant (Less)</u>	Less than Significant (Less)	Less than Significant with Mitigation (Less/Similar)	<u>Less than Significant with Mitigation (Similar)</u>
AIR-4: Odors							
	Less than Significant	No Impact (Less)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>	Less than Significant (Similar)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>
Biological Resources							
BIO-1: Species Identified as Candidate, Sensitive, or Special Status Species	No Impact	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>
BIO-2: Riparian Habitat or Other Sensitive Natural Community	No Impact	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>
BIO-3: State or Federally Protected Wetlands	No Impact	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>
BIO-4: 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	Less than Significant with Mitigation	No Impact (Less)	Less than Significant with Mitigation (Less)	<u>Less than Significant with Mitigation (Less)</u>	Less than Significant with Mitigation (Less)	Less than Significant with Mitigation (Less/Similar)	<u>Less than Significant with Mitigation (Similar)</u>

Impact	Project	No Project	Partial Preservation Alternative		Reduced Demolition Alternative	Adaptive Reuse/Reduced Project Alternative	
			<u>Scenario 1</u>	<u>Scenario 2</u>		<u>Scenario 1</u>	<u>Scenario 2</u>
BIO-5: Conflict with Local Policies or Ordinances	Less than Significant with Mitigation	No Impact (Less)	Less than Significant with Mitigation (Less)	<u>Less than Significant with Mitigation (Less)</u>	Less than Significant with Mitigation (Less)	Less than Significant with Mitigation (Less/Similar)	<u>Less than Significant with Mitigation (Similar)</u>
<u>BIO-6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan</u>	<u>No Impact</u>	<u>No Impact (Similar)</u>	<u>No Impact (Similar)</u>	<u>No Impact (Similar)</u>	<u>No Impact (Similar)</u>	<u>No Impact (Similar)</u>	<u>No Impact (Similar)</u>
Cultural Resources							
CUL-1: Historic Architectural Resources							
Construction	Significant and Unavoidable	Significant and Unavoidable (Less)	<u>Less than Significant (Less)</u>	Significant and Unavoidable (Less)	Significant and Unavoidable (Less)	Less than Significant with Mitigation (Less)	<u>Significant and Unavoidable (Less)</u>
Operation	Less than Significant with Mitigation	Significant and Unavoidable (Greater)	Less than Significant with Mitigation (Similar/Less)	<u>Significant and Unavoidable (Greater)</u>	Less than Significant with Mitigation (Less)	Less than Significant with Mitigation (Less)	<u>Less than Significant with Mitigation (Less)</u>
CUL-2: Archaeological Resources							
Construction	Less than Significant with Mitigation	No Impact (Less)	Less than Significant with Mitigation (Less)	<u>Less than Significant with Mitigation (Less)</u>	Less than Significant with Mitigation (Less)	Less than Significant with Mitigation (Less)	<u>Less than Significant with Mitigation (Less)</u>
Operation	No Impact	No Impact (Similar)	No impact (Similar)	<u>No impact (Similar)</u>	No impact (Similar)	No impact (Similar)	<u>No Impact (Similar)</u>

Impact	Project	No Project	Partial Preservation Alternative		Reduced Demolition Alternative	Adaptive Reuse/Reduced Project Alternative	
			<u>Scenario 1</u>	<u>Scenario 2</u>		<u>Scenario 1</u>	<u>Scenario 2</u>
CUL-3: Paleontological Resources							
Construction	Less than Significant with Mitigation	No Impact (Less)	Less than Significant with Mitigation (Less)	<u>Less than Significant with Mitigation (Less)</u>	Less than Significant with Mitigation (Less)	Less than Significant with Mitigation (Less)	<u>Less than Significant with Mitigation (Similar)</u>
Operation	No Impact	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>
CUL-4: Human Remains							
Construction	Less than Significant with Mitigation	No Impact (Less)	Less than Significant with Mitigation (Similar Less)	<u>Less than Significant with Mitigation (Less)</u>	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)	<u>Less than Significant with Mitigation (Similar)</u>
Operation	No Impact	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>
Energy							
ENE-1: Cause Wasteful, Inefficient, or Unnecessary Consumption of Energy	Less than Significant	No Impact (Less)	Less than Significant (Less)	<u>Less than Significant (Less)</u>	Less than Significant (Less)	Less than Significant (Less)	<u>Less than Significant (Similar)</u>
ENE-2: Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency	Less than Significant	No Impact (Less)	Less than Significant (Less)	<u>Less than Significant (Less)</u>	Less than Significant (Less)	Less than Significant (Less)	<u>Less than Significant (Similar)</u>
Greenhouse Gas Emissions							
GHG-1: Generate Emissions	Significant and Unavoidable	No Impact (Less)	Significant and Unavoidable (Less)	<u>Significant and Unavoidable (Less)</u>	Significant and Unavoidable (Less)	Significant and Unavoidable <u>Less than Significant with Mitigation (Less)</u>	<u>Significant and Unavoidable (Similar)</u>
GHG-2: Conflict with Applicable Plans	Less than Significant	No Impact (Less)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>	Less than Significant (Similar)	Less than Significant (Greater)	<u>Less than Significant (Similar)</u>

Impact	Project	No Project	Partial Preservation Alternative		Reduced Demolition Alternative	Adaptive Reuse/Reduced Project Alternative	
			<u>Scenario 1</u>	<u>Scenario 2</u>		<u>Scenario 1</u>	<u>Scenario 2</u>
Hazards and Hazardous Materials							
HAZ-1: Routine Transport, Use, or Disposal of Hazardous Materials	Less than Significant	No Impact (Less)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>	Less than Significant (Similar)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>
HAZ-2: Upset and Accident Conditions	Less than Significant	No Impact (Less)	Less than Significant (Greater)	<u>Less than Significant (Greater)</u>	Less than Significant (Greater)	Less than Significant (Greater)	<u>Less than Significant (Similar)</u>
HAZ-3: One-quarter Mile from an Existing School	Less than Significant	No Impact (Less)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>	Less than Significant (Similar)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>
HAZ-4: Hazardous Materials Database Listings	Less than Significant with Mitigation	Significant and Unavoidable (Greater)	Less than Significant with Mitigation (Similar)	<u>Less than Significant with Mitigation (Similar)</u>	Less than Significant with Mitigation (Greater)	Significant and Unavoidable (Greater)	<u>Less than Significant with Mitigation (Similar)</u>
HAZ-5: Located Within an Airport Land Use Plan	No Impact	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>
HAZ-6: Emergency Response Plan or Emergency Evacuation Plan	Less than Significant	No Impact (Less)	No Impact (Less)	<u>No Impact (Less)</u>	No Impact (Less)	No Impact (Less)	<u>No Impact (Similar)</u>
HAZ-7: Wildland Fires	No Impact	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>
Hydrology and Water Quality							
HYDRO-1: Violate Water Quality Standards or Waste Discharge Requirements	Less than Significant	Significant and Unavoidable (Greater)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>	Less than Significant (Similar)	Significant and Unavoidable (Greater)	<u>Less than Significant (Similar)</u>
HYDRO-2: Deplete Groundwater Supplies or Interfere with Recharge	Less than Significant	No Impact (Less)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>	Less than Significant (Similar)	Less than Significant (Less)	<u>Less than Significant (Similar)</u>
HYDRO-3: Alter Existing Drainage Pattern Resulting in Erosion or Siltation	Less than Significant	No Impact (Less)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>	Less than Significant (Similar)	Less than Significant (Less)	<u>Less than Significant (Similar)</u>
HYDRO-4: Alter Existing Drainage Pattern Resulting in Flooding	Less than Significant	No Impact (Less)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>	Less than Significant (Similar)	Less than Significant (Less)	<u>Less than Significant (Similar)</u>

Impact	Project	No Project	Partial Preservation Alternative		Reduced Demolition Alternative	Adaptive Reuse/Reduced Project Alternative	
			<u>Scenario 1</u>	<u>Scenario 2</u>		<u>Scenario 1</u>	<u>Scenario 2</u>
HYDRO-5: Alter Existing Drainage Resulting in Exceeded Capacity of Drainage Systems or Polluted Runoff	Less than Significant	No Impact (Less)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>	Less than Significant (Similar)	Less than Significant (Less)	<u>Less than Significant (Similar)</u>
HYDRO-6: Alter Existing Drainage Resulting in Impeded or Redirected Flood Flows	Less than Significant	No Impact (Less)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>	Less than Significant (Similar)	Less than Significant (Less)	<u>Less than Significant (Similar)</u>
HYDRO-7: Release Pollutants due to Inundation	Less than Significant	No Impact (Less)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>	Less than Significant (Similar)	Less than Significant (Less)	<u>Less than Significant (Similar)</u>
HYDRO-8: Conflict with Water Quality Control Plan or Sustainable Groundwater Management Plan	No Impact	No Impact (Less)	No Impact (Similar)	<u>No Impact (Similar)</u>	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>
Land Use and Planning							
LUP-1: Physically Divide and Established Community	Less than Significant	Less than Significant (Greater)	Less than Significant (Greater)	<u>Less than Significant (Greater)</u>	Less than Significant (Greater)	Less than Significant (Greater)	<u>Less than Significant (Less)</u>
LUP-2: Create a Significant Impact due to a Conflict with Plans, Policies, or Regulations	Less than Significant	No Impact (Less)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>	Less than Significant (Similar)	Less than Significant (Similar)	<u>Less than Significant (Similar)</u>
Noise							
NOI-1: Noise Levels in Excess of Established Standards							
Construction	Less than Significant with Mitigation	No Impact (Less)	Less than Significant with Mitigation (Less)	<u>Less than Significant with Mitigation (Less)</u>	Less than Significant with Mitigation (Less)	Less than Significant with Mitigation (Less)	<u>Less than Significant with Mitigation (Similar)</u>
Operation	Less than Significant with Mitigation	No Impact (Less)	Less than Significant with Mitigation (Similar)	<u>Less than Significant with Mitigation (Similar)</u>	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Less)	<u>Less than Significant with Mitigation (Greater)</u>

Impact	Project	No Project	Partial Preservation Alternative		Reduced Demolition Alternative	Adaptive Reuse/Reduced Project Alternative		
			<u>Scenario 1</u>	<u>Scenario 2</u>		<u>Scenario 1</u>	<u>Scenario 2</u>	
NOI-2: Excessive Groundborne Vibration or Groundborne Noise Levels								
Construction	Significant and Unavoidable	No Impact (Less)	Less than Significant with Mitigation (Less)	<u>Less than Significant with Mitigation (Less)</u>	Significant and Unavoidable (Similar)	Less than Significant with Mitigation (Less)	<u>Significant and Unavoidable (Similar)</u>	
Operation	No Impact	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>	No Impact (Similar)	No Impact (Less)	<u>No Impact (Similar)</u>	
NOI-3: Expose People in Vicinity of Private Air Strip or Airport Land Use Plan to Excessive Noise Levels								
	No Impact	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>	
Transportation								
TRA-1: Conflict with Plan, Ordinance, or Policy Addressing Circulation System, Including Transit, Roadway, Bicycle, and Pedestrian Facilities								
Construction	Less than Significant with Mitigation	No Impact (Less)	Less than Significant with Mitigation (Less)	<u>Less than Significant with Mitigation (Less)</u>	Less than Significant with Mitigation (Less)	Less than Significant with Mitigation (Less)	<u>Less than Significant with Mitigation (Less)</u>	
Operation	Significant and Unavoidable	No Impact (Less)	Significant and Unavoidable (Similar)	<u>Significant and Unavoidable (Similar)</u>	Significant and Unavoidable (Similar)	Significant and Unavoidable (Less)	<u>Significant and Unavoidable (Similar)</u>	
TRA-2: Conflict or be Inconsistent with CEQA Guidelines Section 15064.3								
	No Impact	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>	No Impact (Similar)	No Impact (Similar)	<u>No Impact (Similar)</u>	
TRA-3: Increase Hazards due to a Geometric Design Feature or Incompatible Uses								
	Less than Significant with Mitigation	No Impact (Less)	Less than Significant with Mitigation (Similar)	<u>Less than Significant with Mitigation (Similar)</u>	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)	<u>Less than Significant with Mitigation (Similar)</u>	
TRA-4: Inadequate Emergency Access								
	Less than Significant with Mitigation	No Impact (Less)	Less than Significant with Mitigation (Similar)	<u>Less than Significant with Mitigation (Similar)</u>	Less than Significant with Mitigation (Similar)	Less than Significant with Mitigation (Similar)	<u>Less than Significant with Mitigation (Similar)</u>	

Impact	Project	No Project	Partial Preservation Alternative		Reduced Demolition Alternative	Adaptive Reuse/Reduced Project Alternative	
			<u>Scenario 1</u>	<u>Scenario 2</u>		<u>Scenario 1</u>	<u>Scenario 2</u>
Tribal Cultural Resources							
TCR-1: Change in the significance of a Tribal Cultural Resource	No Impact	No Impact (Less)	No Impact (Similar)	<u>No Impact (Similar)</u>	No Impact (Similar)	No Impact (Less)	<u>No Impact (Similar)</u>
Utilities and Service Systems							
UTL-1: Relocation or Construction of New Facilities	Less than Significant	No Impact (Less)	Less than Significant (Less)	<u>Less than Significant (Less)</u>	Less than Significant (Less)	Less than Significant (Less)	<u>Less than Significant (Similar)</u>
UTL-2: Sufficient Water Supplies Available	Less than Significant	No Impact (Less)	Less than Significant (Less)	<u>Less than Significant (Less)</u>	Less than Significant (Less)	Less than Significant (Less)	<u>Less than Significant (Greater)</u>
UTL-3: Adequate Capacity by Wastewater Treatment Provider	Less than Significant	No Impact (Less)	Less than Significant (Less)	<u>Less than Significant (Less)</u>	Less than Significant (Less)	Less than Significant (Less)	<u>Less than Significant (Greater)</u>
UTL-4: Generate Solid Waste in Excess of Standards	Less than Significant	No Impact (Less)	Less than Significant (Less)	<u>Less than Significant (Less)</u>	Less than Significant (Less)	Less than Significant (Less)	<u>Less than Significant (Greater)</u>
UTL-5: Comply with Statutes and Regulations Related to Solid Waste	Less than Significant	No Impact (Less)	Less than Significant (Less)	<u>Less than Significant (Less)</u>	Less than Significant (Less)	Less than Significant (Less)	<u>Less than Significant (Greater)</u>

SOURCE: ESA, 2020.

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CHAPTER 5

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