

IV. Environmental Impact Analysis

I. Land Use and Planning

1. Introduction

This section describes the existing land use and planning setting of the Project Site and vicinity, identifies associated regulatory requirements, and evaluates potential impacts related to implementation of the proposed Project. The analysis evaluates whether the Project would cause significant environmental impacts by conflicting with applicable plans, regulations, policies, or ordinances of an agency with jurisdiction over the Project, adopted specifically to mitigate or avoid an environmental impact, and what measures may feasibly mitigate such impacts to less than significant.

2. Environmental Setting

a) Regulatory Framework

The following describes the primary regulatory requirements regarding land use and planning. Applicable plans and regulatory documents/requirements include the following:

- California Government Code Section 65302
- Senate Bill 375
- Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
- City of Los Angeles General Plan
- Hollywood Community Plan
- Los Angeles Municipal Code
- Citywide Design Guidelines
- Freeway Adjacent Advisory Notice for Sensitive Users (ZI No. 2427)

(1) Federal/State

(a) *California Government Code Section 65302*

California law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. As stated in Section 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principle, standard, and plan proposals." While a general plan will contain the community vision for future growth, California law also requires each plan to address the mandated elements listed in Section 65302. The mandatory elements for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety.

(b) *Senate Bill 375 (Sustainable Communities and Climate Protection Act)*

The adoption of California's Sustainable Communities and Climate Protection Act, Senate Bill (SB) 375 (Steinberg, Chapter 728, Statutes of 2008), on September 30, 2008, aligns with the goals of regional transportation planning efforts, regional greenhouse gas (GHG) reduction targets, and land use and housing allocations. SB 375 requires Metropolitan Planning Organizations, such as the Southern California Association of Governments (SCAG), to adopt a sustainable communities strategy (SCS) or Alternative Planning Strategy within their regional transportation plan (RTP) to demonstrate achievement of GHG reduction targets. In compliance with SB 375, SCAG has adopted an SCS that covers all of the City of Los Angeles, as well as other cities and counties.

(2) Regional

(a) *2020–2045 RTP/SCS or Connect SoCal*

SCAG is the designated Metropolitan Planning Organization for six Southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial), and is federally mandated to develop plans for transportation, growth management, hazardous waste management, and air quality. The City of Los Angeles (City) is one of several cities that fall under SCAG's jurisdiction.

The Final 2020–2045 RTP/SCS (also referred to as Connect SoCal) was made available in March 2020. The RTP/SCS represents the vision for Southern California’s future, including policies, strategies, and projects for advancing the region’s sustainability through 2045. The RTP/SCS details how the region will address its transportation and land use challenges in order to achieve its regional emissions standards and GHG reduction targets. The following are the RTP/SCS goals:

- Encourage regional economic prosperity and global competitiveness
- Improve mobility, accessibility, reliability, and travel safety for people and goods
- Enhance the preservation, security, and resilience of the regional transportation system
- Increase person and goods movement and travel choices within the transportation system
- Reduce greenhouse gas emissions and improve air quality
- Support healthy and equitable communities
- Adapt to a changing climate and support an integrated regional development pattern and transportation network
- Leverage new transportation technologies and data-driven solutions that result in more efficient travel
- Encourage development of diverse housing types in areas that are supported by multiple transportation options
- Promote conservation of natural and agricultural lands and restoration of habitats¹
- The components of Connect SoCal are required by federal and State legislation and it is an important planning document for the region. In May 2020 the Regional Council approved Connect SoCal for the limited purpose of submitting the plan to the Federal Highway Administration and Federal Transit Administration for review prior to the June 1, 2020 deadline, as required by the Clean Air Act). On September 3, 2020, the Regional Council formally adopted Connect SoCal and the addendum to the Connect SoCal Program Environmental Impact Report (EIR).² On June 5, 2020, SCAG received approval for the transportation conformity determination from the Federal Highway Administration and Federal Transit Administration.³

¹ Southern California Association of Governments (SCAG), The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments, Connect SoCal, 2020.

² SCAG, *News Release: SCAG Regional Council formally adopts Connect SoCal*, Adopted September 3, 2020. <http://scag.ca.gov/Documents/PR-SCAG-ConnectSoCal.pdf> (2020).

³ SCAG, “News Release: SCAG Regional Council formally adopts Connect SoCal,” September 3, 2020.

(3) Local

(a) *City of Los Angeles General Plan*

California state law requires every city and county to adopt a comprehensive General Plan to guide its future development. The City's General Plan serves as a "constitution for development" and is the foundation for all land use decisions. The General Plan includes a Framework Element, a Health and Wellness Element, an Air Quality Element, a Conservation Element, a Housing Element, a Noise Element, an Open Space Element, a Service Systems Element/Public Recreation Plan, an Infrastructure Systems Element, a Safety Element, a Mobility Element, and a Land Use Element comprised of 35 community plans.

(i) *General Plan Framework Element*

The General Plan Framework Element, adopted in December 1996 and readopted in August 2001, sets forth a strategy for long-term growth that sets a Citywide context to guide the subsequent amendments of the City's community plans, zoning ordinances, and other pertinent programs. The Framework Element consists of 10 chapters that provide guidance to the comprehensive update of general plan elements and related implementation measures.

The Land Use chapter of the Framework Element establishes the Neighborhood District, Community Center, Regional Center, Downtown Center, and Mixed-Use Boulevard land use designations, and provides policies applicable to each land use designation to support the vitality of the City's residential neighborhoods and commercial districts.⁴ Portions of the Project Site are located within the "Community Center" designation, which are designated as focal points and activity centers for surrounding residential neighborhoods. The Land Use chapter includes the following goal applicable to the Project:

Goal 3: Pedestrian-oriented, high activity, multi- and mixed-use centers that support and provide identity for Los Angeles' communities.

The Urban Form and Neighborhood Design chapter of the Framework Element establishes goals, objectives, and policies related to urban form and neighborhood design in the City. "Urban form" is defined as "the general pattern of building height and development intensity" and the structural elements that define the City physically, such as natural features, transportation corridors, activity centers, and focal elements. "Neighborhood design" refers to the physical character of neighborhoods and communities within the City. The Framework Element does not directly address the

⁴ City of Los Angeles, General Plan Framework Element, Chapter 3 Land Use, 2001.

design of individual neighborhoods or communities but embodies generic neighborhood design and implementation programs that guide local planning efforts and lay a foundation for the updating of community plans. With respect to neighborhood design, the Urban Form and Neighborhood Design chapter encourages growth in regional centers, which have a sufficient base of both commercial and residential development to support transit services.⁵ The Urban Form and Neighborhood Design chapter includes the following objectives applicable to the Project:

Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.

Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.

The Economic Development chapter of the Framework Element establishes development goals to provide the physical locations and competitive financial environment necessary to attract various types of economic development to the City, and to encourage the geographic distribution of job growth in a manner supportive of the City's overall planning objectives.⁶ The Economic Development chapter includes the following objectives applicable to the Project:

Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.

Objective 7.10: Program resources in a manner that encourages appropriate development, housing opportunities, transit service and employment generation in all areas of the City, with particular emphasis on those portions of the City which historically have not received a proportional share of such opportunities, consistent with the City's overall economic policies.

The Transportation chapter of the Framework Element has a vision that includes a multimodal transportation system that provides choices and accessibility to everyone in Los Angeles. The Transportation chapter stresses that transportation investment and policies will need to follow a strategic plan, including capitalizing on currently committed infrastructure and the adoption of land use policies to better utilize committed

⁵ City of Los Angeles, General Plan Framework Element, Chapter 5 Urban Form and Neighborhood Design, 2001.

⁶ City of Los Angeles, General Plan Framework Element, Chapter 7 Economic Development, 2001.

infrastructure.⁷ This chapter of the Framework Element is implemented through Mobility Plan 2035, which was adopted by the City Council on September 7, 2016, and is a comprehensive update to the Transportation Element. The applicable goals and policies of the Mobility Plan 2035 are addressed under “City of Los Angeles Mobility Element (Mobility Plan 2035)” below.

The Infrastructure Systems and Public Facilities and Services chapters of the Framework Element includes goals, objectives and policies to address public infrastructure and services necessary to support population growth, replace existing facilities that have deteriorated due to age or have become obsolete, and maintain and improve quality of life. The infrastructure and service systems include wastewater, stormwater, water, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest.⁸ The goals and policies that are applicable to the proposed Project are specified within their respective resource chapter, including Section IV.L, Public Services, and Section IV.O, Utilities, of this Draft EIR.

(ii) *City of Los Angeles Mobility Element (Mobility Plan 2035)*

On August 11, 2015, the City Council adopted Mobility Plan 2035, followed by the August 13, 2015, adoption of the Street Standard Plan/S-470-1 by the City Planning Commission. The City Council subsequently re-adopted Mobility Plan 2035 on September 7, 2016, and it is now in effect. Mobility Plan 2035 incorporates “complete streets” principles and lays the policy foundation for how the City’s residents interact with their streets. It includes five main goals that define the City’s high-level mobility priorities: (1) Safety First; (2) World Class Infrastructure; (3) Access for All Angelenos; (4) Collaboration, Communication, and Informed Choices; and (5) Clean Environments and Healthy Communities. Each of the goals contains objectives and policies to support the achievement of those goals. Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through Mobility Plan 2035.⁹ The policies applicable to the proposed Project include the following:

Policy 2.3 Pedestrian Infrastructure: Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

⁷ City of Los Angeles, General Plan Framework Element, Chapter 7 Transportation, 2001.

⁸ City of Los Angeles, General Plan Framework Element, Chapter 7 9 Infrastructure and Public Services, 2001.

⁹ City of Los Angeles, Mobility Element, 2016.

Policy 3.3 Land Use Access and Mix: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.

Policy 3.8 Bicycle Parking: Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.

(iii) *Conservation Element*

The City of Los Angeles General Plan includes a Conservation Element, which addresses the preservation, conservation, protection, and enhancement of the City's natural resources. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue protecting historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities. The Conservation Element refers to the Open Space Element for a discussion of open space aspects of the City, including park sites.

(iv) *Health and Wellness Element (Plan for a Healthy Los Angeles)*

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City's General Plan, provides high-level policy vision, along with measurable objectives and implementation programs to elevate health as a priority for the City's future growth and development. The Plan for a Healthy Los Angeles identifies a vision of health for the City that includes complete neighborhoods, access to goods and services, community design that promotes health, access for all, resources, opportunities for physical activity, healthy and sustainability environments, clean air, soil, and water, smoke-free environments, ample green space, minimizing toxins and GHG emissions, and climate resiliency.¹⁰ Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others. The plan includes the following goals:

- Los Angeles, A Leader in Health and Equity
- A City Built for Health

¹⁰ City of Los Angeles, Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, 2015.

- Bountiful Parks and Open Spaces
- Food that Nourishes the Body, Soul, and Environment
- An Environment Where Life Thrives
- Lifelong Opportunities for Learning and Prosperity
- Safe and Just Neighborhoods¹¹

Each goal includes supporting objectives to track improvements to community health. Included in the Health and Wellness Element are policies pertaining to the arrangement of land uses within the City and building design procedures. As such, these policies address characteristics of the physical environment that contribute to public health. These goals and policies identify actions that are to be carried out by the City and are not applicable to the proposed Project.

(v) Hollywood Community Plan

The land use policies and standards of the Framework Element and the General Plan elements are implemented at the local level through the community planning process. Community plans are oriented toward specific geographic areas of the City, defining locally the Framework Element's more general policies and programs, and are intended to promote an arrangement of land uses, streets, and services that will encourage and contribute to the economic, social, and physical health, safety, welfare, and convenience of the people who live and work in the community. Goals, objectives, policies, and programs are created to meet the existing and future needs of the community. The Project Site is located within the Hollywood Community Plan area (Plan Area). The current Hollywood Community Plan (adopted September 13, 1988) sets forth planning goals and objectives to guide land uses and maintain the community's distinctive character. The Hollywood Community Plan is a policy document that is used to shape future development of the community and is the basis for land use decisions and findings. It identifies goals and policies, such as land use, housing, and mobility, and provides information and guidance regarding the Plan Area to the City Council, the Mayor, the City Planning Commission, other concerned government agencies, residents, property owners, developers, employers, and private organizations concerned with planning and civic betterment. The Department of City Planning is in the process of updating the Hollywood Community Plan and released a Draft Community Plan Update and Draft EIR in November 2018. Until the Hollywood Community Plan Update is approved, the 1988 Hollywood Community Plan is in effect. Objective 7 of the Hollywood Community Plan is

¹¹ City of Los Angeles, Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, 2015.

related to the proposed Project. Objective 7 is “to encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.”¹²

(vi) *Vermont/Western Transit Oriented District Specific Plan/Station Neighborhood Area Plan*

The Vermont/Western Transit Oriented District Specific Plan/Station Neighborhood Area Plan (SNAP) is intended to implement the goals and policies of the Hollywood Community Plan, the General Plan Framework Element, and Transportation Element through land use regulations and designation of subareas. The SNAP regulations are in addition to those set forth in the Planning and Zoning provisions of Chapter 1 of the Los Angeles Municipal Code (LAMC), and any other relevant ordinance, and do not convey any rights not otherwise granted under such other provisions, except as specifically provided. The SNAP defines a “Unified Hospital Development Site” as a “development site with a single ownership interest held by a legal entity or its affiliated entities, for the purpose of conducting Hospital or Medical Uses, if the site is composed of two or more contiguous lots, one or more tied lots or lots of record separated only by a street or alley, and has a combination of functional linkages, such as vehicular or pedestrian connections.” Map 1 of the SNAP also designates the Project Site as Subarea C: Community Center, except the northern portion of Site 6 (defined below), which is located within Subarea B: Mixed Use Boulevard.¹³ When regulations conflict, the SNAP supersedes the LAMC, including LAMC Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code (Zoning Code).

SNAP Development Standards and Design Guidelines

Development within the Project Site is subject to the requirements of the SNAP Development Standards and Design Guidelines (CPC No. 00-1796 SP), which contain provisions to direct change on private and public lands within the boundaries of the SNAP. The Development Standards and Design Guidelines include criteria regarding site planning, building design, facade treatments, open space, landscaping, and other standards for private property as well as for the public right of way and public facilities located within the boundary of the SNAP.

¹² City of Los Angeles. Hollywood Community Plan, December 13, 1988.

¹³ City of Los Angeles Department of City Planning, Vermont/Western Transit Oriented District Specific Plan/Station Neighborhood Area Plan, March 1, 2001.

(b) LAMC and Zoning Code

All development activity on the Project Site is subject to the LAMC and the Zoning Code. The Zoning Code includes development standards for the various districts in the City.

(c) Citywide Design Guidelines

The Citywide Design Guidelines implement the Framework Element's urban design principles and are intended to be used by Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and the applicable Community Plan. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were initially adopted by the City Planning Commission in July 2013 and updated in October 2019, are intended as performance goals and not zoning regulations or development standards, and therefore, do not supersede regulations in the LAMC. The guidelines "carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions"¹⁴ and are organized around one of three design approaches: Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Citywide Design Guidelines incorporate the goals of the previous Walkability Checklist, a guidance document to improve the pedestrian environment, and interact with other guidelines.

(d) Transit Priority Area

The Project is located within a Transit Priority Area pursuant to SB 743, due to its proximity to a major transit stop as defined in Public Resources Code Section 21064.3. The Public Resources Code defines a "Transit Priority Area" as an area within one-half mile of a major transit stop that is existing or planned. A "major transit stop" is a site containing a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the AM and PM peak commute periods. An "infill site" refers to a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. Metro runs multiple bus lines along Vermont Avenue and Sunset Boulevard. The nearest stop is Vermont/Sunset, 0.4 miles from the furthest point of the Project Site.

¹⁴ City of Los Angeles Department of City Planning, Citywide Design Guidelines, October 24, 2019.

b) Existing Conditions

(1) Project Site

(a) Existing On-Site Land Uses

As discussed in Chapter II, Environmental Setting, of this Draft EIR, the term “Project Site” refers to the properties on which the proposed redevelopment would occur. In this document, the term “Medical Center campus” refers to the entirety of the Kaiser Permanente Los Angeles facility, which is within the Unified Hospital Development Boundary (see Chapter II, Environmental Setting, **Figure II-2**, Unified Hospital Development Boundary). The site numbers and their corresponding addresses and Assessor’s Parcel Numbers (APNs) are defined in **Table IV.I-1** below. The proposed building sites that together form the Project Site and their existing on-site land uses are as follows:

- Site 1 currently supports non-hospital uses that are not associated with Kaiser Permanente’s operations, including five commercial structures, including one 3,928-square-foot commercial building with a 105-square-foot outbuilding and three commercial buildings with a combined floor area of 9,244 square feet situated along North Vermont Avenue; two gated surface parking lots containing a combined total of 47 parking stalls; and a one-story 1,836-square-foot residential duplex structure with a detached garage situated along North New Hampshire Avenue.
- Site 2 is currently developed with a surface parking lot with 39 parking stalls supporting Kaiser Permanente facilities and is 34,582 square feet in size.
- Site 3 is currently developed with a Kaiser Permanente Medical Office Building (MOB), a small surface parking area, and a parking structure. The existing MOB is 79,356 square feet in size and seven stories (103 feet) in height. Surface parking is located along the north side of the MOB, with additional parking located in a garage beneath the surface parking area. The parking area supports 47 parking stalls and is 15,077 square feet in size.
- Site 4 is currently developed with a Kaiser Permanente MOB, which is 120,557 square feet in size and eight stories (99 feet) in height. The MOB is separated from a service building to the north (which is not a part of Site 4) by an alleyway and is separated from a hospital building to the east by an alleyway, landscaping, and a walkway. There are no parking areas on Site 4. However, the existing MOB on Site 4 is connected to a Kaiser Permanente parking structure on the west side of North Edgemont Street (the parking structure is not a part of Site 4).

- Site 5 is currently developed with a two- to three-level parking structure with MOB space inside. The existing parking structure at Site 5 is 114,736 square feet in size and supports 186 parking stalls. The existing MOB space located inside the parking structure is 19,199 square feet in size.
- Site 6 is currently developed with surface parking and a one-story temporary construction trailer. The temporary construction trailer is the only existing building on the site. Site 6 is 24,964 square feet in size.

(b) *Surrounding Uses*

Land uses generally surrounding the Project Site include open space to the north, specifically Barnsdall Art Park; commercial uses to the northeast along North Vermont Avenue; residential, commercial, and hospital uses to the east and southeast, including the Children’s Hospital of Los Angeles and the Hollywood Presbyterian Medical Center along Sunset Boulevard and North Vermont Avenue; residential and commercial uses to the south; and residential and commercial uses to the west.

(2) **General Plan, Zoning, and SNAP Designations**

As shown in **Figure II-6**, Land Use Designations (see Chapter II, Environmental Setting, of this Draft EIR), the Project Site is primarily designated Community Commercial in the Hollywood Community Plan and is zoned C2-CSA1 (Commercial, Centers Study Area Height District 1) with the following exceptions: the western portion of Site 1 (1326 and 1328 North New Hampshire Avenue [APN 5543-014-003]) is designated Community Commercial and is zoned R4-1 (Multiple Dwelling Zone, Height District 1); the northern portion of Site 4 is zoned PB-1 (Parking Building, Height District 1); and the entirety of Site 6 is designated Low Medium II Residential and is zoned RD2-1XL (Restricted Density Multiple Dwelling Zone, Height District 1XL).

The SNAP is divided into six subareas as shown in **Figure II-8** (see Chapter II, Environmental Setting, of this Draft EIR). The subareas are designated as follows: Subarea A (Neighborhood Conservation), Subarea B (Mixed Use Boulevard), Subarea C (Community Center), Subarea D (Light Industrial/Commercial), Subarea E (Public Facility), and Subarea F (Large Scale Highway Oriented Commercial). As shown on Table IV.I-1 below, all of the parcels, with the exception of a portion of Site 6, are designated as Subarea C, which permits residential uses permitted in the R4 Zone per LAMC Section 12.11, Hospital and Medical Uses, and commercial uses permitted in the C4 Zone per LAMC Section 12.16. APN 5543-007-028 is designated as Subarea B, which permits residential uses in the R3 Zone per LAMC Section 12.10, and commercial uses permitted in the C1.5 Zone per LAMC Section 12.13.5. APN 5543-022-013 and a portion of 5543-022-015 are not located within the boundaries of the SNAP.

The associated zoning, Community Plan designation, and SNAP subarea for each site by address or APN are included in Table IV.I-1 below.

**Table IV.I-1
Existing Land Use Designations and Zoning**

Site	Address/APN	Zone/Height District	Hollywood Community Plan	SNAP Subarea
Proposed Project/Building Sites				
1	1345 North Vermont Avenue (APN 5543-013-009)	C2-CSA1		
	1326 and 1328 North New Hampshire Avenue (APN 5543-014-003)	R4-1		
	1325 North Vermont Avenue (APN 5543-014-014)	C2-CSA1	Community Commercial	Subarea C
	1337 and 1339 North Vermont Avenue (APN 5543-014-015)	C2-CSA1		
2	1428 North L Ron Hubbard Way (APN 5543-015-004)	PB-1		
	1429 North New Hampshire Avenue (APN 5543-015-014)	PB-1	Community Commercial	Subarea C
	4760 West Sunset Boulevard (APN 5543-015-021)	C2-CSA1		
3	1505 North Edgemont Street (APN 5543-007-025)	C2-CSA1	Community Commercial	Subarea C
4	No address associated (APN 5543-010-014)	RD1.5-1XL		
	1526 North Edgemont Street (APN 5543-010-017)	C2-CSA1	Community Commercial	Subarea C
5	1517 North Vermont Avenue (APN 5543-012-022)	C2-CSA1	Community Commercial	Subarea C
6	4950 Sunset Boulevard (APN 5543-022-015)	RD2-1XL	Low Medium II Residential	Subarea C
	Northern half of Site 6 fronting Sunset Boulevard bounded by Alexandria Avenue and Kenmore Avenue Southern L-shaped half of Site 6	C2-CSA1	Community Commercial	Outside SNAP Area

Site Proposed for Change to SNAP

**Table IV.I-1
Existing Land Use Designations and Zoning**

Site	Address/APN	Zone/Height District	Hollywood Community Plan	SNAP Subarea
N/A	1517–1559 Edgemont Street; 1516–1556 North Kenmore Avenue (APN 5543-007-028)	RD 1.5-1XL	Low Medium II Residential	Subarea B
N/A	1429 North Kenmore Avenue (APN 5543-022-013)	RD2-1XL	Low Medium II Residential	Not in SNAP Area

SOURCES: City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988; City of Los Angeles, City of Los Angeles Zoning Information No. 2374, 2018; City of Los Angeles Department of City Planning, Vermont/Western Transit Oriented District Specific Plan/Station Neighborhood Area Plan, effective March 1, 2001.

NOTES: Subarea C = Community Center; Subarea B = Mixed Use Boulevard.

3. Project Impacts

a) Thresholds of Significance

In accordance with the State California Environmental Quality Act (CEQA) Guidelines Appendix G (Appendix G), the Project would have a significant impact related to land use and planning if it would result in any of the following impacts:

Threshold (a): Physically divide an established community; or

Threshold (b): Conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

This analysis relies on the Appendix G Thresholds. The analysis also uses the following factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

Land Use Consistency

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

Land Use Compatibility

- The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area; or
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

b) Methodology

To evaluate the Project's impacts related to land use and planning, this analysis examines the Project's consistency with both regional and local plans, policies, and regulations that regulate uses on the Project Site.

CEQA Guidelines Section 15125(d) requires that an EIR include a discussion of any inconsistencies with applicable land use policies and ordinances that were adopted to mitigate or avoid an environmental effect. Additionally, a conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382. An excerpt from the legal practice guide, "Continuing Education of the Bar, Practice Under the California Environmental Quality Act," Section 12.34 illustrates the point:

... if a project affects a river corridor, one standard for determining whether the impact is *significant* might be whether the project violates plan policies protecting the corridor; the environmental *impact*, however, is the physical impact on the river corridor.

Analysis of conflicts and consistency with applicable plans is included in this impact section. Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests, and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a General Plan or elements of a General Plan if it furthers one or more policies and does not obstruct other policies.¹⁵ Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy.

¹⁵ Governor's Office of Planning and Research, State of California General Plan Guidelines, 2017.

As stated, the analysis below examines the Project’s consistency with both regional and local plans, policies, and regulations that regulate uses on the Project Site. To the extent that the Project’s potential conflict with a plan, program, or policy is analyzed in another section of the EIR (e.g., the Air Quality Management Plan in the Air Quality section, or the Congestion Management Plan in the Transportation section), those plans are not further discussed in this section of the EIR.

c) Project Design Features

There are no project design features related to land use and planning.

d) Analysis of Project Impacts

Threshold (a): Would the project physically divide an established community?

As discussed in Chapter VI.6, Effects Not Found To Be Significant, and in the Initial Study (Appendix A-1), the Project would not physically divide an established community. The Project Site is surrounded by a mixture of medical uses, commercial uses, open space, and residences. The Project Site is located approximately 200 feet south of existing Kaiser buildings and is across the street from the Hollywood Presbyterian Medical Center and Children’s Hospital Los Angeles. Development of the Project Site with medical uses and parking uses would be consistent with the surrounding uses to the north and east and would not obstruct access to or through existing communities. Furthermore, the Project would not involve features such as a highway, aboveground infrastructure, or an easement through an established neighborhood having the potential to divide an established community. **Thus, the Project would have no impact with respect to Threshold (a). No impact related to physical divisions in an established community would occur and no further analysis is required.**

Threshold (b): Would the project conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

(1) Impact Analysis

(a) Regional Transportation Plan

The RTP/SCS represents the vision for Southern California’s future, including policies, strategies, and projects for advancing the region’s sustainability through 2045. The RTP/SCS details how the region will address its transportation and land use challenges in order to achieve its regional emissions standards and GHG reduction targets. The 2020–2045 RTP/SCS incorporates several goals that are applicable to the Project and that would reduce the Project’s environmental impacts. Table 1 in Appendix H of this Draft EIR includes a detailed analysis whether the Project would conflict with 2020–2045

RTP/SCS Goals and Policies. Briefly summarized, the Project would redevelop a major medical center and produce approximately 1,807 employment opportunities at an important job site for the City. The Project's proximity to the Vermont/Sunset Station of the Metro B Line would increase accessibility to these employment opportunities and the services provided at the Medical Center campus. The Project would support the use of the Metro B Line, which is integrated with multiple transit systems. Additionally, the Project focuses employment within a commercial center of the City and approximately 80 feet from the Vermont/Sunset Station. For these reasons, and as shown in Table 1 (Appendix H), the Project would not conflict with the applicable goals in the RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, Project impacts related to potential conflict with the Regional Transportation Network would be less than significant.

(b) General Plan Framework Element

The General Plan Framework Element sets forth a strategy for long-term growth that sets a Citywide context to guide the subsequent amendments of the City's community plans, zoning ordinances, and other pertinent programs. The applicable goals, objectives, and policies of the General Plan Framework Element, and a detailed analysis of whether the Project would conflict with those goals, objectives, and policies, are presented in Table 2 (Appendix H). Briefly summarized, the Project would not conflict with General Plan Framework Element because it would focus employment within a commercial center of the City, in close proximity to the Vermont/Sunset Station. In addition, the Sunset/Vermont and the Sunset/Edgemont bus stops are located in close proximity to proposed Project Site. As such, the Project concentrates redevelopment within an existing Community Center land use designated area. The Project would provide high-quality jobs, including skilled healthcare, business, and administrative professional positions within the City's healthcare industry. For these reasons and based on the additional analysis provided in Table 2 (Appendix H), the Project would not conflict with the applicable goals, policies, and objectives of the General Plan Framework Element. Therefore, Project impacts related to potential conflict with the General Plan Framework Element would be less than significant.

(c) Mobility Plan 2035

Mobility Plan 2035 incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. It includes five main goals that define the City's high-level mobility priorities: (1) Safety First; (2) World Class Infrastructure; (3) Access for All Angelenos; (4) Collaboration, Communication, and Informed Choices; and (5) Clean Environments and Healthy Communities. A detailed analysis of whether the Project would conflict with the applicable policies of Mobility Plan 2035 is presented in Table 3 (Appendix H). Briefly summarized, the Project would not conflict with Mobility Plan 2035 because it would support the use of the Metro B Line,

which is integrated with multiple transit systems. Additionally, as contemplated by Mobility Plan 2035, the Project focuses employment within a commercial center of the City in proximity to the Vermont/Sunset Station and would result in redevelopment within an urban area that is in proximity to existing residential neighborhoods. As such, the Project would promote land use access throughout the Project area. For these reasons, and as shown in Table 3 (Appendix H), the Project would not conflict with the applicable policies of Mobility Plan 2035. Therefore, Project impacts related to potential conflict with the Mobility Plan would be less than significant.

(d) *Conservation Element*

The City of Los Angeles General Plan includes a Conservation Element, which addresses the preservation, conservation, protection, and enhancement of the City's natural resources. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Initial Study prepared for the proposed Project (Appendix A-1) determined, the Project would have the potential to conflict with the Conservation Element with respect to archaeological and paleontological protection (Section 3), cultural and historical conservation and protection (Section 5), endangered species (Section 6), erosion (Section 8), geologic hazard (Section 11), and habitats (Section 12). As discussed in Section IV.D, Cultural Resources, of this Draft EIR, the Project would have less-than-significant impacts related to cultural and historical resources, and upon incorporation of Mitigation Measure **MM-CUL-1**, the Project would have less-than-significant impacts related to archaeological resources. As further described in Section IV.D, the Project would not conflict with the Conservation Element relative to archaeological, cultural, and historical conservation and protection such that environmental impacts would occur. Additionally, as discussed in Section IV.C, Biological Resources, of this Draft EIR, the Project would have less-than-significant impacts related to special-status species and habitats or other sensitive natural communities. Further, as discussed in Section IV.E, Geology and Soils, of this Draft EIR, the Project would not result in substantial erosion or loss of topsoil and would not directly or indirectly cause potential adverse effects related to geologic hazards. For these reasons and as further analyzed in Section IV.D, Cultural Resources; Section IV.C, Biological Resources; and Section IV.E, Geology and Soils, the Project would not conflict with the Conservation Element. Therefore, Project impacts related to potential conflict with the Conservation Element would be less than significant.

(e) *Plan for a Healthy Los Angeles*

The Plan for a Healthy Los Angeles identifies a vision of health for the City that includes complete neighborhoods; access to goods and services; community design that promotes health, access for all, resources, opportunities for physical activity, and healthy and sustainability environments; clean air, soil, and water; smoke-free environments; ample

green space, minimized toxins and greenhouse gas emissions; and climate resiliency. As further described in Section IV.B, Air Quality, and Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, impacts related to air quality and GHG emissions would be less than significant. In addition, the Project involves redevelopment and expansion of a community-serving use in a community, which historically has not received a proportional share of opportunities within the City. The Project would expand medical services through an increase in medical office space. The Project would also enhance the walkability of the Project Site, through methods such as pedestrian-level wayfinding signage, landscaping, lighting along pedestrian walkways, outdoor seating areas, and shade trees. Further, the Project would introduce approximately 1,807 employment opportunities in an area served by the Metro B Line and bus services along Vermont Avenue and Sunset Boulevard. Specifically, the Project Site is located 80 feet at its closest point and 0.4 miles at its furthest point from the Vermont/Sunset Station. Further, as previously discussed under Environmental Setting, the Project Site is within a Transit Priority Area. The redevelopment and expansion of an employment center within the existing Medical Center campus within a Transit Priority Area allows the Project Site to serve as a vision of health for the City. Therefore, impacts related to potential conflict with the Plan for a Healthy Los Angeles would be less than significant.

(f) *Hollywood Community Plan*

Other scenic highways in the surrounding area include State Route 27 (Topanga Canyon State Scenic Highway; an official designated state scenic highway), which is over 16 miles to the west of the Project Site; Interstate (I-) 210 from I-5 near Tunnel Station to Route 134 (an eligible state scenic highway located approximately 9 miles northeast of the Project Site)¹⁶; and State Route 2, which is located 9 miles to the northeast of the Project Site. Due to distance and intervening terrain, vegetation and development, neither on-site trees and landscaping, nor the brick church building at the intersection of Sunset Boulevard and Alexandria Avenue, the Self-Realization Fellowship Hollywood Temple, and Barnsdall Art Park, are within the viewshed of a designated state scenic highway. Therefore, the Project would not damage scenic resources, including trees, rock outcroppings, historic buildings, or other natural or human-made features within a designated state scenic highway.

(g) *SNAP*

Section 12 of the SNAP provides that prior to the issuance of a building permit for any project, the Director of Planning must approve a Project Permit Compliance application in accordance with LAMC Section 11.5.7C. LAMC Section 11.5.7C provides that the Director of Planning shall approve a Project Permit Compliance application upon written

¹⁶ California Department of Transportation, California Scenic Highways, accessed October 14, 2020.

findings that a project substantially complies with the applicable regulations, findings, standards and provisions of the SNAP, and that a project incorporates mitigation measures, or alternatives identified in the environmental review which would mitigate the negative environmental effects of the project, to the extent physically feasible. Therefore, through the Project Permit Compliance review process, the City will ensure that the Project is consistent with the regulations of the SNAP.

As indicated in Table IV.I-1, the Project Site is located within the SNAP with the exception of a portion of Site 6, which is outside of the SNAP boundary. The Project would expand the boundaries of the SNAP to include all of Site 6 (4950 Sunset Boulevard; APN 5543-022-015) and 1429 North Kenmore Avenue (APN 5543-022-013) within the SNAP area, and to designate them Subarea C. Additionally, 1517–1559 Edgemont Street and 1516–1556 North Kenmore Avenue (APN 5543-007-028), which is already within the SNAP boundaries, is proposed to change from Subarea B to Subarea C. As part of Project approval, the SNAP would be amended as described in Chapter III, Project Description under the Necessary Approvals. Specifically, the SNAP would be amended to redefine the boundary of a “Unified Hospital Development Site,” permit a new sign type, and expand the boundaries of Subarea C. Upon approval of these amendments to the SNAP, the Project would be consistent with the SNAP. The proposed amendments to the SNAP are not required to reduce any environmental effects to any of the resources described in Section IV.A, Aesthetics, through Section IV.P, Energy, of this Draft EIR. As such, the Project would not conflict with the regulations of the SNAP. Further, the City would require that the Project comply with all applicable development and design requirements consistent with Subarea C because upon Project approval, including approval of the requested SNAP Amendment, the entire Project Site would be within Subarea C. Thus, the Project would be consistent with the SNAP Development Standards and Design Guidelines. Therefore, Project impacts related to potential conflict with the SNAP would be less than significant.

(h) City of Los Angeles Zoning Code

As discussed previously, the Project Site is zoned C2-CSA1 (Commercial, Centers Study Area Height District 1) with the following exceptions. The western portion of Site 1 (1328 North New Hampshire Avenue) is zoned R4-1 (Multiple Dwelling Zone, Height District 1). The northern portion of Site 4 is zoned RD1.5-1XL (Restricted Density Multiple Dwelling Zone, Height District 1XL). The majority of Site 6 is zoned RD2-1XL (Restricted Density Multiple Dwelling Zone, Height District 1XL). A small part of the northern portion of Site 6 is designated as Community Commercial and zoned C2-CSA1.

According to Section 3B of the SNAP, “wherever this SNAP contains provisions which require or permit greater or lesser setbacks, street dedications, open space, densities, heights, uses, parking, or other controls on development than would be allowed or

required pursuant to the provisions contained in Chapter 1 of the Code, the SNAP shall prevail and supersede the applicable provisions of the Code.”¹⁷ Therefore, the SNAP regulations would be used over the LAMC regulations with respect to land use, height and floor area, transitional height, usable open space, parking requirements, existing buildings, conversion requirements, pedestrian throughways, yards and setbacks, and development standards because these issues are addressed and controlled by the SNAP. As discussed above, the Project would be consistent with the SNAP upon approval of the proposed SNAP Amendments and completion of Project Permit Compliance review. Therefore, the Project would not conflict with the LAMC’s development parameters for the above-mentioned zones and height districts because they would not apply.

Additionally, pursuant to LAMC Section 16.05, Site Plan Review is required for development projects which creates or results in the increase of 50,000 gross square feet or more of nonresidential floor area. As such, the Project would be required to go through the Site Plan Review process. The purpose of the Site Plan Review is to ensure development projects are properly related to their sites, surrounding properties, traffic circulation, sewers, other infrastructure, and environmental setting. No construction permits shall be issued unless a site plan approval has been obtained.

Approval of the Project would ensure compliance with applicable development standards and would ensure the Project is constructed consistently with the intent and purpose of the SNAP and Zoning Code, where applicable. Through the plan check process, the City would thoroughly review all plans for the Project to ensure there is no conflict with any applicable provision of the LAMC or with other relevant plans, policies, and regulations. Therefore, Project impacts related to potential conflict with the Zoning Code would be less than significant.

(i) Citywide Design Guidelines

The Citywide Design Guidelines identify the desired level of design quality for new construction projects. The guidelines are organized around Pedestrian-First and 360 Degree design approaches. 360 Degree design focus on design techniques that equally consider all sides of a building’s use of materials, massing, articulation, and scale. The Project’s potential to conflict with the Citywide Design Guidelines could result in environmental impacts related to transportation due to lack of pedestrian access, and aesthetics related to the proposed buildings’ consistency with the surrounding environment. However, as discussed in Chapter III, Project Description, and Section IV.M, Transportation, of this Draft EIR, the Project would promote safe pedestrian access, would carefully incorporate vehicular access to not degrade the pedestrian experience,

¹⁷ City of Los Angeles Department of City Planning, Vermont/Western Transit Oriented District Specific Plan/ SNAP, effective March 1, 2001.

and would engage with streets. Additionally, as discussed in Section IV.A, Aesthetics, of this Draft EIR, the new construction proposed as part of the Project would be of similar scale and massing to existing Medical Center campus facilities. The Project would consider the surrounding context, express a coherent architectural idea that is consistent with existing Kaiser Permanente facilities, and would incorporate landscaping and other features to support the walkability of the Project Site. Further, the Project Site is located within a Transit Priority Area and pursuant to Public Resources Code Section 21099(d)(1) and ZI No. 2452, any Project impacts related to aesthetics shall not be considered significant impacts on the environment. Therefore, the Project would not conflict with the Citywide Design Guidelines adopted for the purposes of avoiding or mitigating an environmental effect. Impacts would be less than significant.

(j) *Summary of Land Use Impacts*

Based on the analysis above and in Table 2 (see Appendix H), the Project would not conflict with applicable land use plans, policies, and regulations of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant.

(2) **Mitigation Measures**

Impacts relating to conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect are less than significant. Therefore, no mitigation measures are required.

(3) **Level of Significance after Mitigation**

Impacts relating to conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

c) Cumulative Impacts

(1) **Impact Analysis**

Cumulative land use impacts could occur if any of the related projects would physically divide an established community or cause a significant environmental impact due to a conflict with adopted any land use plans, policies, or regulations when combined with the impacts of the Project.

Threshold (a): Would the project physically divide an established community?

The Project Site is highly urbanized and developed. The Project Site is surrounded by a mixture of medical uses, commercial uses, park space, and residences. The Project Site is surrounded by existing Kaiser buildings, the Hollywood Presbyterian Medical Center, and the Children's Hospital Los Angeles. Development of the Project Site with medical uses and parking uses would be consistent with the surrounding uses to the north and east and would not obstruct access to or through existing communities. Furthermore, the Project would not involve features such as a highway, aboveground infrastructure, or an easement through an established neighborhood having the potential to divide an established community. **Therefore, the Project's contribution to impacts on land use and planning would not be cumulatively considerable, and cumulative impacts related to land use and planning would be less than significant.**

Threshold (b): Would the project conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

As detailed in Chapter II, Environmental Setting, there are 85 related projects located within proximity to the Project Site. The Project in combination with the 85 related projects would result in an environmental impact, in the event of conflict with a land use plan, policy, or regulation, adopted for the purposes of mitigating an environmental effect. The 85 related projects include mixed-use residential, retail, restaurant office, hotel, commercial, residential, and other facilities. Given the built-out conditions of the greater Los Angeles region, including the Project area, cumulative development would likely convert existing underutilized properties in the Los Angeles area to revitalized higher-density developments to respond to the need for housing, sources of employment, and associated retail land uses. Given the Hollywood Community Plan's vision to promote an arrangement of land uses, streets, and services that will encourage and contribute to the economic, social, and physical health, safety, welfare, and convenience of the people who live and work in the community, the increase in density due to the related projects would be consistent with the mixed-use core envisioned by the Hollywood Community Plan. Additionally, a mix of uses within proximity to transit promotes alternative modes of transportation, consistent with the RTP and Mobility Element. Specifically, the Project would develop the surrounding community by replacing inefficient and aging facilities; improving Kaiser Permanente's ability to deliver healthcare services to meet the needs of the City's residents. In addition, by providing additional healthcare services and employment in close proximity to transit, the Project would assist the City in achieving short- and long-term planning goals and objectives related to reducing urban sprawl, efficiently utilizing existing infrastructure, reducing regional congestion, and improving air quality through the reduction of vehicle miles traveled. This is consistent with SCAG and City policies for promoting more intense land uses adjacent to transit stations and job

centers. Further, all related projects in the City would be subject to the same local development and standards as the Project. **Therefore, the Project's contribution to impacts on land use and planning would not be cumulatively considerable, and cumulative impacts related to land use and planning would be less than significant.**

(2) Mitigation Measures

Cumulative land use impacts would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative land use impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.