I. Executive Summary

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of the Draft Environmental Impact Report (EIR) contains a summary of the proposed Kaiser Permanente Los Angeles Medical Center Project (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section of the Draft EIR is an overview of the purpose and focus of the Draft EIR, summary of the Project, summary of environmental impacts, public review process, areas of controversy, and summary of the alternatives.

This section also includes information from the following documents, which are included as Appendices A-1, A-2, and A-3 to this Draft EIR:

A-1 Initial Study, City of Los Angeles, September 2017

A-2 Notice of Preparation of Environmental Impact Report and Public Scoping Meeting, City of Los Angeles, September 21, 2017

A-3 Comments Received in Response to Notice of Preparation of Environmental Impact Report and Public Scoping Meeting, City of Los Angeles

1. Purpose of this Draft EIR

The purpose of this Draft EIR is to inform decision-makers and the general public of the potential environmental impacts resulting from the Project and to indicate the manner in which those significant effects can be mitigated or avoided, either through mitigation measures or alternatives to the Project. A description of the environmental setting is provided in Chapter II, Environmental Setting, of this Draft EIR. A detailed description of the Project is provided in Chapter III, Project Description, of this Draft EIR.

The Project will require certain discretionary approvals by the City of Los Angeles (City) and other governmental agencies. Therefore, the Project is subject to the environmental review requirements under CEQA.[1] For purposes of complying with CEQA, the City of Los Angeles is identified as the Lead Agency for the Project.

[1] California Public Resources Code Sections 21000–21177.

As described in Section 15121(a) and 15362 of the State CEQA Guidelines,[2] an EIR is an informational document which will inform public agency decision-makers and the public of the potentially significant environmental effects of a project, identify possible ways to mitigate any significant environmental effects, and identify and evaluate a reasonable range of alternatives to the project that have the potential to reduce or avoid the project's potential significant environmental effects, while feasibly accomplishing most of the project's basic objectives. When applicable, the Draft EIR recommends feasible mitigation measures that can reduce or avoid significant environmental impacts. This EIR was prepared in accordance with Section 15151 of the State CEQA Guidelines, which defines the standards for EIR adequacy as follows:

> An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

2. Draft EIR Focus and Effects Not Found to Be Significant

In accordance with Section 15128 of the State CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research, responsible agencies, and other interested parties on September 21, 2017 , for a 30-day review period. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reason that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils,
- Greenhouse Gas Emissions

[2] 14 California Code of Regulations 15000 et seq.

- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- and Utilities and Service Systems
- Energy

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts to agricultural and forestry resources; biological resources, including substantial adverse impact to special status species, natural communities, and wetlands, or potential conflicts with habitat conservation plans and natural community conservation plans; geology and soils – soils to support septic tanks; hazards and hazardous materials, including hazards related to airport or airstrips and wildfire; hydrology and water quality, including flood hazard areas; land use—division of an established community; mineral resources; noise—airport noise and private airstrip noise; and population and housing – displacement of housing or people. Therefore, these areas were not further analyzed in this Draft EIR. The Initial Study that demonstrated that no significant impacts would occur for these areas is included in Appendix A of this Draft EIR.

3. Draft EIR Organization

The Draft EIR is organized into eight sections as follows:

Chapter I **Executive Summary**: This chapter describes the purpose of this Draft EIR, provides an introduction to the environmental review process, an overview of the Draft EIR focus and effects found not to be significant, and a summary of the Project description, alternatives, environmental impact analysis contained in the Draft EIR, and mitigation measures.

Chapter II **Environmental Setting**: This chapter provides an overview of the environmental setting of the Project, including a description of existing and surrounding land uses, and a list of related projects.

Chapter III **Project Description**: This chapter provides a description of the Project including location, Project Site characteristics, Project characteristics, Project objectives, and required discretionary actions.

Chapter IV **Environmental Impact Analysis**: This chapter examines the potential environmental impacts of the Project. Separate discussions are included

which address the potential environmental effects of the Project by environmental topic. Each environmental topical analysis contains a discussion of existing conditions, an assessment and discussion of the potential significance of impacts associated with the Project, mitigation measures, cumulative impacts, and the level of significance of the impact after mitigation.

Chapter V **Alternatives to the Project**: This chapter includes an analysis of a range of reasonable alternatives to the Project. The alternatives selected are based on their potential ability to feasibly attain most of the basic objectives of the Project, and their ability to avoid or substantially lessen any of the significant effects of the Project.

Chapter VI **Other CEQA Considerations**: This chapter provides a summary of the significant and unavoidable impacts of the Project, an explanation of significant irreversible environmental changes, discussion of potential growth inducing effects that would be caused by the Project, and effects not found to be significant.

Chapter VII **References**: This chapter provides a list of references and works cited in this Draft EIR.

Chapter VIII **Acronyms and Abbreviations**: This chapter provides definitions for all of the acronyms and terms used in this Draft EIR.

Chapter IX **Preparers of the Draft EIR and Persons Consulted**: This chapter presents a list of City, County, and other agencies and consultant team members that contributed to the preparation of the Draft EIR.

Appendices: The Appendices contain all technical reports prepared for the Project as well as all correspondence with various agencies regarding the Project.

- Appendix A: Initial Study, NOP, and NOP Comment Letters
  - A-1: Initial Study
  - A-2: NOP
  - A-3: NOP Comment Letters
- Appendix B: Air Quality and Greenhouse Gas Emissions Modeling
  - B-1: Construction and Operational Methodology

  - B-2: Air Quality and Greenhouse Gas Emissions Modeling Data

- Appendix C: Protected Tree Report
- Appendix D: Cultural Resources Technical Report
  - D-1: Cultural Resources Report
  - D-2: Native American Heritage Commission Request
- Appendix E: Geotechnical Reports
  - E-1: Geotechnical Report Kaiser Permanente – Vermont Parking Structure Replacement, 1517 North Vermont Avenue
  - E-2: Geotechnical Report, Kaiser Permanente – Medical Office Building, 1526 North Edgemont Street
  - E-3: Additional Subsurface Assessment Report, 1321, 1329, 1345 North Vermont Ave., 1328 North New Hampshire Ave., Los Angeles California 90027
  - E-4: Geotechnical Feasibility Evaluation, Kaiser Permanente – Vermont New Hampshire MOB, 1321, 1329, and 1345 North Vermont Avenue and 1328 North New Hampshire Avenue, Los Angeles, California
  - E-5: Vertebrate Paleontological Records Check
- Appendix F: Hazards Reports and Surveys
  - F-1: Phase I Environmental Site Assessment (ESA), Phase II ESA, and Additional Subsurface Assessment Report
  - F-2: Lead, Asbestos, and Polychlorinated Biphenyls in Caulk Surveys
  - F-3: Environmental Records Review
- Appendix G: Utilities
  - G-1: Water Supply Assessment
  - G-2: Los Angeles Department of Water and Power Will Serve Letter Tract No. 74846

  - G-3: Los Angeles Department of Water and Power Will Serve Letter Tract No. 74847
  - G-4: Los Angeles Department of Water and Power Will Serve Letter Tract No. 74848
  - G-5: Los Angeles Department of Water and Power Will Serve Letter Kaiser Permanente Los Angeles Medical Center Project
  - G-6: Sewage Generation Factor Table
  - G-7: SoCalGas Will Serve Letter
  - G-8: Los Angeles Department of Water and Power Electric Will Serve Letter
- Appendix H: Land Use Consistency Table
- Appendix I: Noise Modeling Data
- Appendix J: Population and Housing Calculations
- Appendix K: Public Services Correspondence
  - K-1: Los Angeles Fire Department Response
  - K-2: Los Angeles Police Department Response
  - K-3: Los Angeles Unified School District Response
  - K-4: Los Angeles Public Libraries Response
- Appendix L: Transportation Impact Study
  - L-1: Transportation Impact Study and Appendices
  - L-2: Transportation Impact Study Approval from Los Angeles Department of Transportation
  - L-3: Construction Traffic Analysis
  - L-4: Vehicle Miles Traveled Analysis
  - L-5: Vehicle Miles Traveled Analysis Approval from Los Angeles Department of Transportation

- Appendix M: Los Angeles Sanitation and Environment Will Serve Letter
- Appendix N: Energy Calculations
  - N-1: Energy Calculations - Construction
  - N-2: Energy Calculations – Operation

4. Revisions to State CEQA Guidelines Appendix G

In January 2018, the Office of Planning and Research proposed comprehensive updates to the CEQA Guidelines which revised the threshold questions for aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, land use and planning, noise, population and housing, transportation, and utilities and service systems and included additional threshold questions to address wildfires. This Draft EIR considers the revised thresholds for the environmental topics addressed herein in Section IV, Environmental Impact Analysis. In addition, the new topic of telecommunications facilities added to the revised threshold questions for utilities and service systems as well as the new threshold questions addressing wildfires are addressed in Section IV. Other CEQA Considerations, of this Draft EIR.

5. Summary of the Project

a) Project Location

The approximately 15.34-acre Kaiser Permanente Los Angeles Medical Center (Medical Center) campus is located along Sunset Boulevard between North Alexandria Avenue and North Vermont Avenue in the Hollywood Community Plan Area of the City. The Project Site is generally located northeast of the Hollywood Freeway (US-101) and southwest of the Golden State Freeway (Interstate 5).

b) Project Overview

The Project would expand the existing Medical Center campus by replacing facilities and adding new buildings. The Project would proceed under a Master Plan/Development Plan Permit for the Medical Center. The Project is proposed in three phases. The first phase of development would include demolition of existing commercial and duplex structures at 1345 North Vermont Avenue (Assessor's Parcel Number [APN] 5543-013-009) and construction of a parking structure and medical office building (MOB) at 1321 North Vermont Avenue (APN 5543-014-014), 1345 North Vermont Avenue, and 1328 North New Hampshire Avenue (APN 5543-014-003); construction of a procedure center addition to the 4760 Sunset Boulevard (APN 5543-015-021) MOB; and demolition of the

1505 North Edgemont Street (APN 5543-007-025) and 1526 North Edgemont Street (APN 5543-010-017) MOBs. The second phase of the development would include the demolition and reconstruction of the 1517 North Vermont Avenue (APN 5543-012-002) parking structure and construction of an MOB at 1526 North Edgemont Street (Option A) or, alternatively, construction of an addition to the existing hospital at 4867 Sunset Boulevard (Option B). The third phase of the development would include construction of an addition to the 4950 Sunset Boulevard (APN 5543-022-015) parking structure and construction of a new MOB at 1505 North Edgemont Street. The proposed buildings for all three phases would total 401,100 square feet under option A or 433,100 square feet under Option B, with an additional 655,800 square feet of parking structure area, for a total of 1,056,900 square feet for Option A or 1,088,900 square feet for Option B.

6. Public Review Process

a) Notice of Preparation/Scoping Meeting

In compliance with Section 15082 of the State CEQA Guidelines, an NOP was prepared by the Department of City Planning and distributed to the State Clearinghouse, Office of Planning and Research, agencies, and other interested parties. The NOP was made available for a 30-day comment period beginning on September 21, 2017, and 2017 and ending October 20, 2017. Appendix A-2 to this Draft EIR contains a copy of the NOP.

A public scoping meeting was held on October 2, 2017, at the Kaiser Permanente Los Angeles Medical Center, 4867 Sunset Boulevard, 2 North Conference Room, Los Angeles, California 90027 from 5:00 p.m. to 7:00 p.m., to obtain the public's input about environmental issues that should be evaluated in this Draft EIR. Appendix A-3 to this Draft EIR contains the written comments to the NOP received by the City. In addition to members of the public, the following agencies, organizations, and individuals provided written comments during the NOP comment period or at the scoping meeting:

- Agencies
  - Governor's Office of Planning and Research
  - Native American Heritage Commission
  - South Coast Air Quality Management District (SCAQMD)
  - Southern California Association of Governments (SCAG)
  - Los Angeles County Metropolitan Transportation Authority (Metro)

- Organizations
  - Hollywood Heritage
- Individuals
  - Eleazar Onglatco Jr.
  - Kath Lewis
  - Marina Barth

b) Environmental Review Process

The Draft EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations for a period of 45 days. After completion of the 45-day review period, a Final EIR will be prepared that includes written responses to comments on the Draft EIR submitted during the review period and modifies the Draft EIR if required. Public hearings on the Project will be held after completion of the Final EIR. The City will make the Final EIR available to agencies and the public prior to considering certification of the Final EIR. Notice of the time and location will be published prior to the public hearing date. All comments or questions about the Draft EIR should be addressed to:

Erin Strelich
Department of City Planning
City of Los Angeles
221 N. Figueroa Street, Suite 1350
Los Angeles, California 90012

Case Number: ENV-2015-4476-EIR

After public review of the Draft EIR, a Final EIR will be prepared in response to comments received during the public review period. The Final EIR will be available for public review prior to consideration of certification of the document by the decision makers.

7. Areas of Controversy

Comments raised in the letters submitted to the Department of City Planning in response to the NOP include (but are not limited to) the following:

- Air quality and noise impacts related to construction activities
- Proximity to historic resources
- Noise and vibration impacts to Metro's B Line and bus stops

8. Significant and Unavoidable Environmental Impacts

Based on the analysis contained in Chapter IV, Environmental Impact Analysis, the Project would result in significant and unavoidable impacts with regard to:

- Construction Noise: Construction noise levels would exceed the applicable significance thresholds for construction in the L.A. CEQA Thresholds Guide because construction activities lasting more than 10 days in a 3-month period would exceed existing ambient exterior noise levels by 5 decibels A-weighted (dBA) or more at a noise-sensitive use.
- Construction Vibration: Construction activities are estimated to result in vibration levels exceeding the Federal Transportation Authority (FTA) building damage and human annoyance impact criteria.
- Cumulative Noise: The Project would contribute to temporary cumulative exceedances of noise standards, and its incremental effect would be cumulatively considerable.

9. Alternatives to Reduce Significant Impacts

CEQA requires that EIRs include the identification and evaluation of a range of reasonable alternatives that are designed to reduce the significant environmental impacts of the project while still meeting the general project objectives.

a) Alternative 1: No Project/No Build

(1) Description of Alternative

CEQA requires the alternatives analysis to include a "no project" alternative where the Project does not proceed. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not

approving the project (State CEQA Guidelines Section 15126.6[e][1]). Pursuant to State CEQA Guidelines Section 15126.6(e)(2), requirements for the analysis of the "no project" alternative are as follows:

> The "no project" analysis is to discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans, and consistent with available infrastructure and community services.

The No Project/No Build Alternative assumes that the Project Site would remain in its current condition as described in Chapter II, Environmental Setting. The Project Site includes six sites located along Sunset Boulevard between North Alexandria Avenue and North Vermont Avenue in the Hollywood Community Plan Area of the City of Los Angeles. Alternative 1 would include the following components:

- Site 1 would continue to support non-hospital uses not associated with Kaiser Permanente's current operations. The site contains four commercial structures along North Vermont Avenue and one residential duplex structure with a detached garage along North New Hampshire Avenue.
- Site 2 would continue to support a surface parking lot supporting Kaiser Permanente facilities.
- Site 3 would continue to support a Kaiser Permanente MOB, and a small surface parking area/parking structure.
- Site 4 would continue to support a Kaiser Permanente MOB.
- Site 5 would continue to support a two- to three-level parking structure with MOB space inside.
- Site 6 would continue to support surface parking and a single-level temporary construction trailer.

No discretionary actions would be required by local, state, or federal agencies for this alternative.

The No Project/No Build Alternative would avoid the following significant and unavoidable impacts associated with the Project:

- Noise in excess of standards
- Excessive groundborne vibration or noise

The No Project/No Build Alternative would minimize several less-than-significant or less-than-significant with mitigation impacts associated with the Project, as shown in **Table V-5**, Comparison of Impacts Under the Project to Impacts Under the Alternatives (see Chapter V, Alternatives, of this Draft EIR).

(2) Comparison of Impacts

As Alternative 1 results in no new development, it generally would be less impactful relative to the Project. Specifically, Alternative 1 would avoid the Project's significant and unavoidable impacts related to Project-specific and cumulative construction noise and vibration.

b) Alternative 2: Development Under Existing Zoning

(1) Description of Alternative

The Development Under Existing Zoning Alternative considers development of the Project Site under the existing zoning. This alternative is considered because it proposes less development when compared to the Project, and no Specific Plan Amendment or zone changes would be required.

Table V-2a (Alternative 2 Buildout Comparison) provides a description of the zoning and land use designations and the Alternative 2 buildout scenario; **Table V-2b** provides a description of the Project for comparison. Alternative 2 considers a medium buildout scenario with land uses consistent with the underlying Vermont/Western Station Neighborhood Area Plan (SNAP) Specific Plan Subarea designations and requirements, or zoning designations and requirements for sites which are not located within the existing SNAP boundaries, and would result in floor area ratios that are less than the floor area ratio proposed for each of the building sites associated with the Project. Alternative 2 would provide a total of 1,148 automobile parking spaces, which would meet the minimum parking requirements for Hospitals and Medical Uses provided for in SNAP

Section 9.E.4.(i),[3] and Los Angeles Municipal Code Sections 12.21.A.4.(d)(1),[4] and 12.21.A.4.(x)(3)6.[5] This would be 758 fewer automobile parking spaces than the proposed Project's 1,906 new spaces.

Alternative 2 includes the following modifications to the Project as proposed:

Site 1

- Reduce 130,000-square-foot MOB development at 1345 North Vermont by 27,174 square feet, to a 102,826-square-foot MOB
- No construction of parking structure
- 129-foot, 13-level MOB reduced to 100-foot, 10-level MOB

Site 2

- Increase in development of proposed 50,000-square-foot Procedure Center addition to an existing MOB at 4760 Sunset Boulevard to 46,686 square feet of hospital use and 20,749 square feet of parking
- 80-foot, 4-level building to remain same height

Site 3

- Reduce 41,500-square-foot MOB development at 1505 North Edgemont Street to a 37,446-square-foot surface and belowground parking structure
- 70-foot, 3-level building to remain same height

Site 4

- No change from the Project, Option B

[3] Pursuant to SNAP Section 9.E.4.(i), "hospitals shall provide a minimum of one parking space for each patient bed for which the hospital is licensed, and a maximum of two parking space for each patient bed for which the hospital is licensed."

[4] Pursuant to Los Angeles Municipal Code (LAMC) Section 12.21A4(d)(1), "Clinics, as defined in Health and Safety Code Section 1202, medical office buildings and other medical service facilities shall provide one automobile parking space per 200 square feet of total floor area."

[5] The Project is located within the geographic boundaries of the Los Angeles State Enterprise Zone. Pursuant to LAMC Section 12.21A4(x)(3)6, when a medical office building and/or medical service facility project is located within the geographic boundaries of a State Enterprise Zone, the parking "need only be two parking spaces for every one thousand square feet of combined gross floor area."

Site 5

- No development to occur

Site 6

- Reduce the parking structure addition to the 4950 Sunset Boulevard parking structure to a 141-stall parking structure addition
- Structure addition would total 82,400 square feet
- 90-foot, 9-level parking structure to be reduced to 60-foot, 6-level building

While less intensive in development, Alternative 2 would not completely avoid the significant and unavoidable noise and vibration impacts associated with the Project, because noise and vibration would still result from the use of heavy construction equipment. Alternative 2 would reduce less-than-significant or less-than-significant with mitigation impacts associated with the Project, as shown in **Table V-4**, Comparison of Impacts Under the Project to Impacts Under the Alternatives (see Chapter V, Alternatives, of this Draft EIR).

(2) Comparison of Impacts

As shown in Table V-2b, Alternative 2 would result in similar development (building area) to the Project and therefore would result in similar impacts. Alternative 2 would not avoid the significant and unavoidable impacts associated with noise and vibration.

c) Alternative 3: Reduced Intensity Alternative

(1) Description of Alternative

With a different reduced development scenario , Alternative 3 would reduce the proposed Project development on Sites 1, 3, 4, and 5. The development on Sites 2 and 6 would be the same as the Project. A similar array of approvals would be required when compared to the Project.

Alternative 3 includes the following modifications to the Project:

Site 1

- Reduce the 130,000-square-foot MOB development at 1345 North Vermont by 10,000 square feet, for a total of 120,000 square feet.
  - The 562-stall parking structure would be the same size and maintain the same number of parking spaces as the Project in order to support business

operations. However, as the overall square footage of the MOB is being reduced, the proposed number of parking spaces would exceed the amount of parking required.

  - The MOB would maintain the same height as the Project at 129 feet and would also be comprised of 9 levels above grade and 4 levels below grade.

Site 3

- Reduce 41,500-square-foot MOB development at 1505 North Edgemont Street by 25,000 square feet, for a total of 16,500 square feet.
  - Development under Alternative 3 would reduce the MOB by one floor level, resulting in a building that would be 50 feet tall and 2 stories in height, as compared the Project, which would be 70 feet tall and 3 stories in height.

Site 4

- Reduce 177,300-square-foot MOB development at 1526 North Edgemont by 10,000 square feet, for a total 167,300 square feet.
  - Development under Alternative 3 would reduce the MOB by one partial floor level, maintaining the same height as the Project at 105 feet, and would also be comprised of 5 levels above grade and 1 level below grade.

Site 5

- Eliminate commercial/retail development at 1517 North Vermont, from 2,300 square feet to 0 square feet. The 230,600-square-foot parking structure (105 feet in height) would remain the same.

For comparison, **Tables V-3a and V-3b** provide a description of the proposed sites, a description of the Project buildout, and a description of Alternative 3 buildout.

(2) Comparison of Impacts

Alternative 3 would not avoid the Project's significant and unavoidable impacts related to Project-specific and cumulative construction noise and vibration. However, because less development would be involved under Alternative 3, these impacts would be less when compared to the Project.

d) Alternative 4: Reduced Intensity and Parking Alternative

(1) Description of Alternative

The Reduced Intensity and Parking Alternative considers a reduction in development as compared to the Project. This alternative is considered because it proposes less development when compared to the Project and thus has the potential to reduce Project impacts associated with development intensity. Alternative 4 would reduce the proposed Project development on Sites 1, 3, 4, 5, and 6. The development on Site 2 would be the same as the Project. Alternative 4 would provide a total of 1,291 automobile parking spaces, which would meet the minimum parking requirements for Hospitals and Medical Uses provided in SNAP Section 9.E.4.(i),[6] and Los Angeles Municipal Code Sections 12.21A4(d)(1),[7] and 12.21A4(x)(3)6.[8] This would be 615 spaces less than the proposed Project's parking of 1,906 new spaces.

This Reduced Intensity and Parking Alternative includes the following modifications to the Project as proposed:

Site 1

- Reduce 130,000-square-foot MOB development at 1345 North Vermont by 10,000 square feet, for a total 120,000 square feet.
  - The parking structure would be the same size and maintain the same number of parking spaces as the Project in order to support business operations.
  - The MOB would maintain the same height as the Project at 129 feet and would also be comprised of 9 levels above grade and 4 levels below grade.

Site 3

- Reduce 73,500-square-foot MOB development at 1505 North Edgemont Street by 25,000 square feet, for a total of 48,500 square feet.
  - Development at Site 3 under Alternative 4 would reduce the MOB by one floor level, resulting in a building that would be 72 feet tall and 4 stories in height, as compared to Project, which would be 90 feet tall and 5 stories in height.

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6 Pursuant to SNAP Section 9.E.4.(i), "hospitals shall provide a minimum of one parking space for each patient bed for which the hospital is licensed, and a maximum of two parking space for each patient bed for which the hospital is licensed."

7 Pursuant to Los Angeles Municipal Code ("LAMC") Section 12.21A4(d)(1) "Clinics, as defined in Health and Safety Code Section 1202, medical office buildings and other medical service facilities shall provide one automobile parking space per 200 square feet of total floor area."

8 The Project is located within the geographic boundaries of the Los Angeles State Enterprise Zone. Pursuant to LAMC Section 12.21A4(x)(3)6, when a medical office building and / or medical service facility project is located within the geographic boundaries of a State Enterprise Zone, the parking "need only be two parking spaces for every one thousand square feet of combined gross floor area."

Site 4

- Eliminate Option A (construction of a 177,300-square-foot MOB) and pursue Option B (construction of a 177,300-square-foot, 105-bed hospital) at 1526 North Edgemont as currently proposed for the Project.
  - There would be no change to the 105-foot height of the hospital as compared to the Project, and there would be still be five levels above grade and 1 level below grade.

Site 5

- Eliminate commercial/retail development at 1517 North Vermont, from 2,300 square feet to 0 square feet. The 230,600-square-foot parking structure (105 feet in height) would remain the same.

Site 6

- Reduce 122,400-square-foot parking structure addition at 4950 West Sunset Boulevard by 40,000 square feet (3 levels).
  - The parking structure would be reduced by 3 levels, for a total of 6 levels, and measure 60 feet tall, as compared the Project's 9-level parking structure, which would measure 90 feet tall. Although this Alternative would result in a reduction of parking spaces, the parking spaces provided would still meet Los Angeles Municipal Code and SNAP minimum parking regulations.

Tables V-4a and V-4b, Alternative 4 Buildout Scenario Comparison and Alternative 4 and Project Buildout Scenario Comparison (see Chapter V, Alternatives, of this Draft EIR) provide a description of the proposed building sites, a description of the Project buildout, and a description of Alternative 4 buildout for comparison.

(2) Comparison of Impacts

Alternative 4 would not avoid the Project's significant and unavoidable impacts related to Project-specific and cumulative construction noise and vibration. However, because less development would be involved under Alternative 4, these impacts would be lessened when compared to the Project.

e) Environmentally Superior Alternative

State CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of the alternatives to a proposed project in an EIR shall identify an environmentally superior

alternative among the alternatives evaluated 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 a comparison of the alternatives that would reduce or eliminate the significant impacts associated with the Project, and on a comparison of the remaining environmental impacts of each alternative to the Project.

To develop Project alternatives, the lead agency considered the Project objectives and reviewed the significant impacts identified in Chapter IV of this Draft EIR, considered those significant impacts that could be substantially avoided or reduced through a range of reasonable Project alternatives and evaluated the comparative merits of the alternatives; refer to **Table V-5**, Comparison of Impacts Under the Project to Impacts Under the Alternatives, at the end of this chapter. The potential environmental impacts associated with the selected alternatives are described below and are compared to the environmental impacts associated with the Project (also refer to Table V-5).

Alternative 1 (the No Project/No Build Alternative) would be environmentally superior to the Project, since this Alternative would avoid all of the significant and unavoidable impacts, including construction noise and vibration (related to excess of standards and temporary increase in ambient noise levels) under the Project. However, Alternative 1 would not achieve any of the Project objectives.

In accordance with State CEQA Guidelines Section 15126.6(e), if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. As demonstrated above, Alternatives 2, 3, and 4 would not avoid the Project’s significant and unavoidable impacts related to Project-specific and cumulative construction noise and vibration. However, because less development would be involved under Alternatives 2, 3, and 4, these impacts would be less when compared to the Project. In the case of Alternative 2, no construction would occur on Site 5, and therefore would reduce the significant and unavoidable Project-specific and cumulative construction noise and vibration impact; however, it would not eliminate this impact.

Therefore, Alternative 2 is the Environmentally Superior Alternative because it would reduce the building sites that would experience construction, and it would result in the fewest impacts when compared to the Project. Alternative 2 would only partially meet the Project objectives because the reduction in the proposed building areas would be a loss in existing capacity and service, would result in a proportional loss in member and community access to proximate and critical hospital services and clinical healthcare in the community where they live, and would impact Kaiser Permanente’s ability to adjust to changes in healthcare service delivery by increasing spatial constraints.

10. Summary of Environmental Impacts

This section provides a summary of impacts, mitigation measures, and impacts after implementation of the mitigation measures associated with implementation of the Project. The summary is provided below in **Table I-1**.

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
IV.A Aesthetics			
Pursuant to Senate Bill 743 and Zoning Information File No. 2452, Project impacts related to aesthetics would be less than significant.	**Construction** **PDF-AES-1**: Construction and operational lighting, including vehicle headlights within new parking structures, will be shielded and/or directed downward (or on the specific on-site feature to be lit) in such a manner as to preclude light pollution or light trespass onto adjacent uses that would cause more than two foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors of existing and anticipated future adjacent uses. **PDF-AES-2:** Where Project construction is visible from pedestrian locations adjacent to the Project Site, temporary construction fencing will be placed along the periphery of all Building Sites to screen construction activity from view at the street level. For Building Sites located near the Metro stations (Site 1 and Site 5), wooden construction fencing shall be installed at the boundary of the areas with public access. Pursuant to the Metropolitan Transportation	No mitigation measures are necessary.	LTS

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	Authority (Metro) Adjacent Construction Design Manual,[9] fencing would be at least 8 feet high and meet all applicable code requirements. **PDF-AES-3:** Kaiser Permanente will ensure, through appropriate postings and daily visual inspections, that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.		
	Glare **PDF-AES-4:** Glass used in building façades will be anti-reflective or treated with an anti-reflective coating to minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building		

[9] Metropolitan Transportation Authority Design Criteria and Standards, Adjacent Construction Design Manual, November 2, 2018.

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SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the California Energy Code requirements shall be permitted.		
IV.B Air Quality			
Consistency with Air Quality Management Plan: The proposed Project would result in emissions that would not exceed the SCAQMD thresholds for volatile organic compounds (VOC), nitrogen oxides (NO_x), sulfur oxides (SO_x), particulate matter less than or equal to 10 microns in diameter (PM_{10}), or particulate matter less than or equal to 2.5 microns in diameter ($PM_{2.5}$) during construction or operations and would not result in a significant and unavoidable impact associated with the violation of an air quality standard. Additionally, the Project's approximately 1,807 new persons to the City by 2030 buildout would represent 0.48 percent of the persons projected in the City between 2017 and 2030 (Project buildout). Thus, cumulative development of the Project would not represent a substantial or significant growth as compared to the employment and population growth projected for the City.	No project design features are applicable.	No mitigation measures are necessary.	LTS

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SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
Construction Emissions: The Project would not exceed the SCAQMD significance thresholds for VOC, NO_x. carbon monoxide (CO), SO_x, PM_{10}, or $PM_{2.}5$ during construction in all construction years. As such, criteria air pollutant impacts associated with construction would be less than significant.	**PDF-AIR-1** All architectural coatings applied on the interior or exterior of Project structures must be in compliance with South Coast Air Quality Management District Rule 1113 and have a volatile organic compound (VOC) content of 50 grams of VOC per liter of coating or less, less water and exempt compounds. **PDF-AIR-2** The Project will include construction dust control strategies in compliance with South Coast Air Quality Management District (SCAQMD) Rule 403, compliance with which will be identified on grading plan approvals. In addition to SCAQMD Rule 403, the following dust control best management practices will be implemented during Project construction: a. Dirt and debris spilled onto paved surfaces at the project site and on the adjacent roadways will be swept, vacuumed, and/or washed at the end of each workday. b. All trucks hauling dirt, sand, soil, or other loose material to and from the construction site will be covered and/or a minimum 2 feet of freeboard will be maintained. **PDF-AIR-3** Where power poles are available, electricity from power poles and/or solar-powered generators rather	No mitigation measures are necessary.	LTS

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	than temporary diesel or gasoline generators will be used during construction. **PDF-AIR-4** The Project will be designed to enhance the walkability of the Project Site, through methods including pedestrian-level wayfinding signage, landscaping, and lighting along pedestrian walkways, outdoor seating areas, and shade trees.		
Operational Emissions: The Project would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO^x, PM_{10}, or $PM_{2.5}$ during Project operations. As such, criteria air pollutant impacts associated with operations would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS
Sensitive Receptors: Construction activities would not generate emissions in excess of site-specific localized significance thresholds. The Project's CO hotspot impacts would be less than significant because they would not expose sensitive receptors to substantial pollutant concentrations. The non-cancer chronic hazard index of 0.021 would not exceed the SCAQMD threshold of 1.0. No short-term, acute relative exposure values are established and regulated for diesel particulate matter and are therefore not addressed in this assessment. Stationary sources at the Project Site would result in a less-than-significant cancer, chronic, and acute health risk impact	No project design features are applicable.	No mitigation measures are necessary.	LTS

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SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
at proximate residential receptors. Therefore, impacts to sensitive receptors would be less than significant.			
Objectionable Odors: The Project would not result in the creation of a land use that is commonly associated with odors. Therefore, Project operations would result in an odor impact that is less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS
IV.C Biological Resources			
Migratory Species: The Project area contains 324 trees, which may potentially support nesting sites for migratory wildlife bird species. There are 89 trees proposed for removal. Nesting activity typically occurs from February 15 to August 31 (January 15 to August 31 for raptors). Disturbing or destroying active nests is a violation of the Migratory Bird Treaty Act and would result in potentially significant impacts.	**PDF-BIO-1 Migratory and Nesting Birds.** Prior to issuance of a grading permit, Kaiser Permanente shall demonstrate the following requirements have been included in the Project construction Plan: 1. Any construction activities that occur during the nesting season (i.e., January 15 through August 31) shall require that all suitable habitat (i.e., street trees and shrubs) be surveyed for the presence of nesting birds by a qualified biologist, retained by the Applicant as approved by the City of Los Angeles Building and Safety, before commencement of clearing and prior to grading permit issuance. The qualified biologist shall conduct a minimum of two pre-construction surveys for nesting birds 5 days apart to identify any active nesting locations in and near the Project Site. Pre-	No mitigation measures are necessary.	LTS

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SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	construction surveys shall be conducted no more than three days prior to Project construction. The survey would consist of full coverage of the proposed Project footprint and an appropriate buffer, as determined by the biologist. If no occupied nests are found, no additional steps would be required. A copy of the pre-construction surveys shall be submitted to the City of Los Angeles Building and Safety. 2. If nests are found being used for breeding or rearing young by a native bird, the nest locations shall be mapped by the biologist using Global Positioning System (GPS) equipment. The species of the nesting bird and, to the degree feasible, the nesting stage (e.g., incubation of eggs, feeding of young, near fledging) would be documented. The biologist may establish an avoidance buffer around occupied nests if there is a significant potential for take of the species or potential for inadvertent destruction of the nest. The buffer shall be determined by the qualified biologist based on the biology of the species present and surrounding habitat (typically a starting point of 300 feet for most birds and 500 feet for raptors but		

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SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	may be reduced as approved by the biologist). No construction or ground-disturbing activities shall be conducted within the buffer until the biologist has determined that the nest is no longer being used for breeding or rearing and has informed the construction supervisor that activities may resume.		
Conflict with Policies: The 89 trees proposed for removal that would be potentially impacted are comprised of 69 privately owned trees and 17 trees within the City right-of-way. In accordance with City's Street Tree Regulations, all 17 trees within the City right-of-way that require removal, for which a permit would be required and must be approved. The Project would comply with all requirements of the City's Tree Protection Ordinance and Street Tree Regulations. Therefore, impacts related to tree removal of street trees would be less than significant.	**PDF-BIO-2 Replacement Tree Monitoring.** An independent certified arborist shall monitor all tree plantings over a 3-year monitoring effort. This monitoring effort shall consider growth, health, and condition of the subject trees to evaluate the planting success. The monitoring effort may result in a recommendation of remedial actions (i.e., supplemental irrigation or fertilization) should any of the tree plantings exhibit poor or declining health. **PDF-BIO-3 Fencing (Parkway Trees).** To the satisfaction of Urban Forestry Division and prior to commencing construction activities, the protected parkway trees that would remain after Project construction shall be wrapped with 2 inches of orange plastic fencing from the ground to the first branch and overlaid with 2-inch-thick wooden slats that are bound securely (slats shall not be allowed to dig into the bark). During installation of the plastic fencing, caution shall be used to avoid damaging branches. Major	No mitigation measures are necessary.	LTS

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SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	scaffold limbs may also require plastic fencing as directed by the Certified Arborist. Tree fences shall be erected before demolition, grading, or construction begins and remain until final inspection of the Project. "Warning" signs shall be prominently displayed on each protective fence. The signs shall be a minimum of 8.5 inches by 11 inches and clearly state the following: **ENTRY PROHIBITED** ***TREE PROTECTION ZONE*** **This Fence Shall Not be Removed** **PDF-BIO-4 Fencing (Protected Oak Tree).** Prior to commencing construction activities, a chain-link fence shall be erected around the protected oak tree that would remain after Project construction. The fence shall be no less than 4 feet high, and tree protection signs (as shown in Project Design Feature **PDF-BIO-3**) shall be erected around all undisturbed protected trees (or tree groups), and undisturbed on-site trees. The protective fence shall be installed 5 feet beyond the tree canopy dripline boundary of each tree (or tree group) ("protected zone"). A qualified arborist shall be required on site if grading activities occur within the tree's protected zone. The fencing shall be		

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	secured to 6-foot-tall, heavy gauge T-bar line posts, pounded in the ground a minimum of 18 inches and spaced a minimum of 8 feet on-center. Fencing shall be attached to T-bar posts with minimum 14-gage wire fastened to the top, middle, and bottom of each post. Tree protection signs shall be attached to every fourth post. The contractor shall maintain the fence to keep it upright, taut, and aligned at all times. Fencing shall be removed only after all construction activities are complete. **PDF-BIO-5 Pre-construction Meeting.** A pre-construction meeting shall be held between all contractors and subcontractors (e.g., grading, tree removal/pruning, and builders) and a qualified arborist. The meeting shall focus on instructing the contractors and subcontractors on tree protection practices and answering any questions. All equipment operators and spotters, assistants, or those directing operators from the ground, shall provide written acknowledgement of receiving tree protection training. This training shall include information on the location and marking of protected trees, the necessity of preventing damage, and the discussion of work practices that shall accomplish these tasks. **PDF-BIO-6 Equipment Operation and Storage.** Contractors and subcontractors		

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Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	shall avoid heavy equipment operation around the protected trees. The on-site qualified arborist shall mark those areas around the protected trees, as necessary, to indicate protected root zones. All heavy equipment and vehicles shall, at minimum, stay out of the fenced protected tree zone and out of the root protected zones unless where specifically approved in writing and under the supervision of a qualified arborist. **PDF-BIO-7 Materials Storage and Disposal.** Contractors and subcontractors shall not store or discard any supplies or materials (e.g., paint, lumber, and concrete overflow) within the protected zone and shall remove all foreign debris within the protected zone. However, the contractors and subcontractors shall leave the duff, mulch, chips, and leaves around the retained trees for water retention and nutrient supply. In addition, the contractors and subcontractors shall avoid draining or leakage of equipment fluids near retained trees. Fluids, such as gasoline, diesel, oils, hydraulics, brake and transmission fluids, paint, paint thinners, and glycol (antifreeze), shall be disposed of properly. The contractors and subcontractors shall ensure that equipment be parked at least 50 feet from the protected zone to avoid		

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	the possibility of leakage of equipment fluids into the soil. The effect of toxic equipment fluids on the retained trees could result in tree decline and/or mortality. **PDF-BIO-8 Grade Changes.** Contractors and subcontractors shall ensure that grade changes, including adding fill, shall not be permitted within the protected tree and root zones without special written authorization and under supervision of a qualified arborist. Contractors shall ensure that grade changes made outside of the protected tree zone shall not create conditions that allow water to pond at the base of the tree. Water trapped at the base of a tree could lead to root rot and other detrimental tree impacts. **PDF-BIO-9 Moving Construction Materials.** Contractors and subcontractors shall ensure that care be exercised when moving construction equipment or supplies near the undisturbed oak tree and protected parkway trees, especially overhead. Contractors and subcontractors shall ensure that damage to the trees shall be avoided when transporting or moving construction materials and working around the tree (even outside of the fenced protected zone). Contractors and subcontractors shall flag aboveground tree parts with potential for damage (e.g., low limbs, scaffold branches,		

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SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	and trunks) with high-visibility flagging, such as florescent red or orange. If contact with the tree crown is unavoidable, conflicting branches may be pruned by an ISA-certified tree worker under supervision of a qualified arborist or their representative and shall adhere to ISA standards. **PDF-BIO-10 Trenching.** Except where specifically approved in writing beforehand by a qualified arborist, all trenching shall be outside of the fenced and root protected zones. Roots primarily extend in a horizontal direction, forming a support base to the tree similar to the base of a wineglass. Where trenching is necessary in areas that contain roots from retained trees, contractors shall use trenching techniques that include the use of either a root pruner (Dosko root pruner or equivalent) or an Air-Spade to limit root impacts. A qualified arborist or their representative shall ensure that all pruning cuts be clean and sharp to minimize ripping, tearing, and fracturing of the root system. Root damage caused by backhoes, earthmovers, dozers, or graders is severe and may result in tree mortality. Use of both root-pruning and Air-Spade equipment shall be accompanied only by hand tools to remove soil from trench locations. The trench shall be made no deeper than necessary.		

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SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	PDF-BIO-11 Irrigation. Irrigation of native protected trees retained on site shall seek to mimic natural rainfall patterns in Southern California. Supplemental irrigation for trees adjacent to construction activity may be necessary during winter or spring months. Summer and fall irrigation may be necessary based on variable climatic and site conditions but should be conducted judiciously to avoid over-watering. One irrigation cycle shall thoroughly soak the root zones of the trees to a depth of 3 feet. The soil shall be allowed to dry out between watering to avoid keeping a consistently wet soil. The contractor or subcontractor shall be responsible for irrigating (deep watering) the trees. Soil moisture shall be checked with a soil probe before irrigating. Irrigation is best accomplished by installing a temporary aboveground micro-spray system that would distribute water slowly (to avoid runoff) and evenly throughout the fenced protection zone. For any trees that have been substantially root pruned (30 percent or more of their root zone), irrigation shall be required for the first 12 months. The first irrigation shall occur within 48 hours of root pruning. The tree(s) shall be deep watered every two weeks during the summer and once a month during the winter (adjust accordingly with rainfall).		

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SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	PDF-BIO-12 Canopy Pruning. The contractor or subcontractor shall not prune protected trees until all construction is completed unless standard pruning would reduce conflict between canopy and equipment. All pruning shall be conducted by an ISA-certified tree worker under supervision of a qualified arborist and shall adhere to ISA pruning standards. **PDF-BIO-13 Inspection.** An ISA-certified arborist/licensed pest control advisor (PCA) or their representative shall inspect the preserved protected trees adjacent to grading and construction activity on a monthly basis for the duration of the proposed project. A report summarizing site conditions, observations, tree health, and recommendations for minimizing tree damage shall be submitted by the ISA-certified arborist/licensed PCA or their representative following each inspection. **PDF-BIO-14 Mulch.** After construction, the contractors and subcontractors shall ensure that the natural duff layer under all trees is maintained. The contractors and subcontractors shall ensure that the mulch is kept clear of the trunk base to avoid creating conditions favorable to the establishment and growth of decay-causing fungal pathogens. Should it be necessary to add organic mulch under retained		

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Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	protected trees, packaged or commercial mulch shall not be used because it may contain oak root fungus. Also, the use of redwood chips shall be avoided because certain inhibitive chemicals may be present in the wood. Other wood chips and crushed walnut shells can be used, but the best mulch that provides a source of nutrients for the tree is its own leaf litter. Any organic mulch added by the contractor or subcontractor shall be applied to a maximum depth of 4 inches where possible. **PDF-BIO-15 Pruning.** After construction, regular pruning of the protected trees is not required. An ISA-certified tree worker, under the supervision of a qualified arborist, shall only prune trees to maintain clearance and remove broken, dead, or diseased branches. No more than 15 percent of the canopy shall be removed at one time. All pruning shall conform to ISA standards. **PDF-BIO-16 Watering.** After construction, the protected trees should not require regular irrigation other than the 12 months following substantial root pruning, if applicable. However, soil probing shall be necessary to accurately monitor moisture levels. Supplemental irrigation for the trees that sustained root pruning and any newly		

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Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	planted trees may be necessary, especially in years with low winter rainfall. **PDF-BIO-17 Watering Adjacent Plant Material.** After construction, all plants near the protected trees shall require moderate to low levels of water. The contractor or subcontractor shall infrequently water surrounding plants with deep soaks, rather than frequent light irrigation, and allow them to dry out between watering. The soil shall not be allowed to become saturated or stay continually wet, and drainage should not allow ponding of water beneath the canopy of the oak trees. Irrigation spray shall not hit the trunk of any tree. The contractor or subcontractor shall maintain a 30-inch dry zone around all tree trunks. An aboveground micro-spray irrigation system shall be used in lieu of typical underground pop-up sprays. **PDF-BIO-18 Chemical Applications.** After construction, if the protected trees are maintained in a healthy state, regular spraying for insect or disease control would not be necessary. If a problem does develop, a representative qualified arborist shall be consulted since the trees may require application of insecticides to prevent the intrusion of bark-boring beetles and other invasive pests. All chemical spraying shall be performed by a licensed		

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Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	applicator under the direction of a licensed PCA. **PDF-BIO-19 Monitoring.** A qualified arborist shall inspect the protected trees retained on site for a period of five years following the completion of construction activity. Monitoring visits shall be completed quarterly, totaling 20 visits. Following each monitoring visit, a report summarizing site conditions, observations, tree health, and recommendations for promoting tree health shall be submitted. Additionally, any tree mortality shall be noted, and any tree dying during the monitoring period shall be replaced with the same species as specified for minimum replacement standards in Appendix C of this EIR.		
IV.D Cultural Resources			
Historical Resources: Each of the six evaluated buildings (1526 North Edgemont Street; 1517 North Vermont Avenue; 1505 North Vermont Avenue; 1321 North Vermont Avenue; 1345 North Vermont Avenue; and 1328 North New Hampshire Avenue) were determined ineligible for listing at the national, state or local level. Thus, they may not be considered historical resources under CEQA.	No project design features are applicable.	No mitigation measures are necessary.	LTS

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Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
Archaeological Resources: The results of the archaeological record search from 2018 indicate that there are no previously identified archaeological resources within the building sites and no archaeological resources within a 0.25-mile radius of the Project Site. However, the potential exists for unknown archaeological resources to be inadvertently unearthed during earth-moving activities associated with construction of the proposed Project. Therefore, impacts are potentially significant.	No project design features are applicable.	**MM-CUL-1 Inadvertent Discovery of Archaeological Resources.** In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under the California Environmental Quality Act (CEQA; 14 California Code of Regulations 15064.5(f); California Public Resources Code Section 21083.2), the archaeologist may simply record the find and allow work to continue. However, if the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.	LTS

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SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
Human Remains: South Central Coastal Information Center records indicate that no previously recorded prehistoric archaeological sites were identified, nor any unmarked burials been recorded within the Project Site or within 0.25 miles of the Project Site. Therefore, the likelihood of encountering human remains within the subsurface of any of the properties within the Project Site is considered low.	No project design features are applicable.	No mitigation measures are necessary.	LTS
IV.E Geology and Soils			
Alquist-Priolo Earthquake Fault: No known active faults cross or are directed toward the Project site, nor is the Project Site located in a currently established Alquist-Priolo Zone of Required Investigation. Therefore, Project impacts related to Alquist-Priolo earthquake faults would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS
Seismic Ground Shaking: Kaiser Permanente would be required to design and construct the Project in conformance to the most recently adopted California Building Code design parameters, City Building Codes, and design parameters of the Hospital Facilities Seismic Safety Act. Conformance with these standards would ensure that impacts related to seismic ground shaking would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS

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Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
Seismic Ground Failure: The Project site is not located within an area of required liquefaction investigation. Therefore, impacts would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS
Landslides: The Project site is not located within a potential Earthquake Induced Landslide Zone, as mapped by the California Geological Survey. Therefore, impacts would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS
Soil Erosion: The Project would comply with the National Pollutant Discharge Elimination System (NPDES) requirements and City grading regulations and through preparation of a Stormwater Pollution Prevention Plan (SWPPP); thus, the Project would minimize the potential for erosion/siltation to occur as a result of the Project. Impacts related to erosion siltation would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS
Unstable Geologic Unit: The potential for subsidence, collapsible soils, and liquefaction to occur at the Project site is considered low. Therefore, impacts would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS
Expansive Soils: The Project would be designed and constructed in conformance with the City's current building code requirements to ensure the foundation system can withstand anticipated soil movement. Conformance with these standards would ensure that Project impacts related to any potential expansive soils would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS

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Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
Paleontological Resource: During construction, if intact paleontological resources are located on site, ground-disturbing activities associated with construction of the Project, such as grading during site preparation and trenching for utilities, have the potential to destroy a unique paleontological resource or site. As such, the Project Site is considered to be potentially sensitive for paleontological resources.	No project design features are applicable.	**MM-GEO-1 Paleontological Monitoring and Resource Treatment.** Prior to commencement of any grading activity on site, the Project Applicant shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards,[1] subject to the review and approval of the Department of City Planning. The Qualified Paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the Project that is consistent with the SVP guidelines and attend the pre-construction meeting. The Qualified Paleontologist or an SVP qualified Paleontological Resource Monitor shall be on site during all rough grading and other significant ground-disturbing activities in depths greater than 5 feet below ground surface. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the Qualified Paleontologist shall	LTS

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery shall be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor shall remove the rope and allow grading to recommence in the area of the find.10	
IV.F Greenhouse Gas Emissions			
Under both Option A and Option of the Project, emissions, emissions generated by buildout of all phases would not exceed the SCAQMD threshold of 3,000 metric tons (MT) CO_2 equivalent per year. In addition, the Project would be consistent with applicable State, regional, and local GHG reduction strategies. As such, the Project's contribution to GHG emissions and global climate change would not be cumulatively considerable and would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS

10 SVP, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources.

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Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
IV.G Hazards and Hazardous Materials			
Routine Transport, Use, or Disposal of Hazardous Materials: The Project involves demolition of existing buildings which could exceed PCB levels at Sites 3 and 4. Additionally, a variety of hazardous substances and wastes would be stored, used, and generated on the Project Site during construction activities. Therefore, impacts related to construction are potentially significant. Once operational, Kaiser Permanente is required to comply with all applicable environmental federal, state, and local laws. Therefore, the Project's operational impacts would not create a significant hazard.	No project design features are applicable.	**MM-HAZ-1 Polychlorinated Biphenyl (PCB) Waste Characterization, Segregation, Disposal and Reuse Plan.** Prior to building demolition, PCB-containing materials must be characterized, segregated, and disposed of in accordance with federal law. The Applicant will engage a licensed contractor to complete the on-site cleanup and disposal of PCBs in accordance with 40 Code of Federal Regulations (CFR) 761.61(a). This requires preparation of a PCB Waste Characterization, Segregation, Disposal, and Reuse Plan (Plan), notifications to the U.S. Environmental Protection Agency (EPA), characterization of PCB-containing materials, remediation or removal of said materials, and proper disposal of said materials. The PCB Waste Characterization, Segregation, Disposal, and Reuse Plan shall include air	LTS

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		monitoring (in accordance with South Coast Air Quality Management District Rule 1403) and soil testing and may also include pilot studies to verify that the proposed remediation strategies are effective. These components would be developed by the licensed contractor, in cooperation with the Applicant. Notifications will be completed as required in 40 CFR 761.61(a)(3); the EPA Regional Administrator has 30 days to review and comment on the Plan; if EPA does not comment, it is deemed approved. **MM-HAZ-2 Hazardous Substance Management, Handling, Storage, Disposal, and Emergency Response Plan.** In order to reduce the risk of accidental release of hazardous materials during construction activities at the site, which release is not foreseeable or anticipated, the Applicant shall prepare and implement during all construction activities a	

TABLE I-1
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Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		hazardous substance management, handling, storage, disposal, and emergency response plan. A hazardous materials spill kit shall be maintained on-site for small spills. Additionally, the Applicant shall monitor all contractors for compliance with applicable regulations, including regulations regarding hazardous materials and hazardous wastes, including disposal. Hazardous materials shall not be disposed of or released on the ground, in the underlying groundwater, or any surface water. Totally enclosed containment will be provided for all trash. All construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials, will be removed to a waste facility permitted to treat, store, or dispose of such materials.	
Upset Conditions Involving the Release of Hazardous Materials: The Project involves demolition of existing buildings which could exceed PCB levels at Sites 3 and 4.	No project design features are applicable.	**MM-HAZ-1** and **MM-HAZ-2**. **MM-HAZ-3 Soil Management Plan.** The Applicant shall prepare a soil management	LTS

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Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
Demolition at Site 1 was determined to have potential for vapor intrusion and the possibility of encountering/assessing Underground Storage Tanks (USTs). Additionally, a variety of hazardous substances and wastes would be stored, used, and generated on the Project Site during construction activities. Therefore, impacts related to construction are potentially significant. Once operational, Kaiser Permanente is required to comply with all applicable environmental federal, state, and local laws. Therefore, the Project's operational impacts would not create a significant hazard.		plan (SMP) for Site 1 prior to excavation and redevelopment activities. The purpose of the SMP is to provide guidance to project management, site management, and field personnel on the identification and management of impacted and clean soil, the segregation and management of impacted soil in accordance with regulatory requirements, the transportation of impacted soil to an off-site disposal facility licensed to accept such soil, and the identification and management of construction debris during excavation, grading, and construction activities to be completed at Site 1. The SMP shall include procedures for identification, handling, reporting, and removal of possible USTs, piping, dispensers or other UST components that may be encountered during construction. The SMP shall include health and safety measures, which may include but are not limited to personal protective equipment and	

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		periodic work breathing zone monitoring and monitoring for volatile organic compounds using a handheld organic vapor analyzer in the event impacted soils are encountered during excavation activities. **MM-HAZ-4 Vapor Barrier.** Soil vapor sampling will be conducted to determine the nature and extent of soil vapor contamination. The analytical results shall be compared to applicable regulatory screening levels. Should soil vapor concentrations exceed applicable screening levels, a vapor mitigation system will be designed for new facilities that include occupied space within the area of contamination. The vapor mitigation system may include passive or active techniques to remove the risk of vapor intrusion into occupied structures. Such conditions could include soil impacted with volatile organic compounds (VOCs) being left in place beneath the depth of ground disturbance for new	

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		construction, the presence of shallow groundwater containing VOC beneath the property, or soil vapor migration from adjacent or nearby sites impacted with VOC. The incorporation of a vapor mitigation system must be reflected in the new building plans.	
Emit Hazardous Materials Near School: The Project involves demolition of existing buildings which could exceed PCB levels at Sites 3 and 4. Demolition at Site 1 was determined to have potential for vapor intrusion and the possibility of encountering/assessing USTs. Additionally, a variety of hazardous substances and wastes would be stored, used, and generated on the Project Site during construction activities. Therefore, impacts related to construction are potentially significant. Once operational, Kaiser Permanente is required to comply with all applicable environmental federal, state, and local laws. Therefore, the Project's operational impacts would not create a significant hazard.	No project design features are applicable.	**MM-HAZ-1, MM-HAZ-2, MM-HAZ-3**, and **MM-HAZ-4**	LTS
Cortese List: Site 1 was identified in the following environmental databases: CA HAZNET - Moncada's Dental Office, 1321 North Vermont Avenue (inorganic solid waste disposal); and EDR - Historical Auto Stations, formerly located	No project design features are applicable.	**MM-HAZ-3** and **MM-HAZ-4**	LTS

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
at 1331 North Vermont Avenue. Investigations of Site 1 revealed construction on Site 1 could result in vapor intrusion, and thus, impacts are potentially significant.			
Emergency Evacuation Plan: The proposed site plan, including the access driveway, would be reviewed and approved by the City's Fire Department during plan check review. As such, impacts would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS
IV.H Hydrology and Water Quality			
Water Quality: Compliance with the Construction General Permit and the Los Angeles Municipal Code Section 64.70 would ensure that stormwater runoff from the site during construction would not violate water quality standards or waste discharge requirements. During Project operations, compliance with performance criteria contained in the Municipal Separate Storm Sewer System (MS4) Permit will ensure that modern performance standards related to retention and treatment of site runoff are integrated into the proposed Project. There is the potential for lead, asbestos, and medical wastes to be generated, stored, and/or handled on site, which could contribute pollutants to stormwater runoff. Therefore, impacts are potentially significant.	No project design features are applicable.	**MM-HAZ-1**	LTS

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
Groundwater Supply and Recharge: The Project does not propose to extract groundwater during the construction or operation of the proposed Project, and no direct adverse impacts to groundwater are expected to occur.	**PDF-HYD-1** High-efficiency toilets with a flush volume of 1.0 gallon of water per flush or less **PDF-HYD-2**: No-flush urinals, with 1.0 gallon of water used for automatic rinsing every 72 hours **PDF-HYD-3** Showerheads with a flow rate of 1.0 gallon per minute or less **PDF-HYD-4** Domestic water heating systems located proximate to the point(s) of use, or a central plant service, based on which system is determined to be most efficient **PDF-HYD-5** Tankless and on-demand water heaters, where appropriate **PDF-HYD-6** Drip/subsurface irrigation and micro sprays (micro sprays apply water only where it is needed, to reduce water waste) **PDF-HYD-7** Use of proper hydro-zoning and zoned irrigation (a method that groups plants with similar water requirements in the same areas of a site to minimize irrigation) **PDF-HYD-8** Water-efficient landscaping (40 percent of plants would be drought tolerant)	No mitigation measures are necessary.	LTS
Alteration of Drainage Pattern: The proposed Project considers Low Impact Development (LID) principles and proposes an on-site storm drain system and storage facilities to preserve	No project design features are applicable.	No mitigation measures are necessary.	LTS

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
existing drainage patterns and to mitigate flows to equal or less than current conditions. No increases in slope, nor in impermeability, are expected as compared with current conditions. Therefore, impacts related to alteration of existing drainage would be less than significant.			
Obstruct Implementation of Plan: Through compliance with Los Angeles Regional Water Quality Control Board (RWQCB) requirements and an NPDES permit, and implementation of a SWPPP (construction phase) and a Standard Urban Stormwater Mitigation Plan (operational phase), the Project would not conflict with or obstruct implementation of the Los Angeles Basin Water Quality Control Plan. Therefore, impacts would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS
IV.I Land Use and Planning			
Consistency with Applicable Plans: The Project would be consistent with, and 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	No project design features are applicable.	No mitigation measures are necessary.	LTS

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
IV.J Noise			
Construction Noise: The City's conditionally acceptable noise level for hospitals is 60–70 dBA Community Noise Equivalent Level (CNEL). Predicted construction noise levels at the nearest residences (Site 1) range from approximately 84 dBA equivalent sound level (L_{eq}) during the architectural coatings phase to 103 dBA L_{eq} during pile driving (which would be a component of building construction). At other sites, such as Site 6, construction noise levels would be nearly as loud at adjacent residential uses. At the western side of Barnsdall Art Park and at residences to the west, construction noise levels from Site 4 would be approximately 60 to 80 dBA L_{eq} when construction takes place along the northern side of the Project site. At the eastern side of Barnsdall Art Park and at residences to the east, construction noise levels from Site 5 would be approximately 57 to 77 dBA L_{eq} when construction takes place along the northern side of the Project site. Construction noise levels would exceed the applicable significance thresholds for construction in the L.A. CEQA Thresholds Guide. Additionally, the estimated noise levels would exceed the noise standard in Los Angeles Municipal Code (LAMC) Section 112.05 of 75 dBA at a distance of 50 feet for construction within 500 feet of any residential	**PDF-NOI-1** The following Project characteristics pertaining to construction noise will be implemented and adhered to: • All construction equipment, fixed or mobile, will be equipped with properly operating and maintained mufflers and silencers, consistent with manufacturing standards. • Construction noise reduction methods, such as shutting off idling equipment, maximizing the distance between construction equipment staging areas and occupied sensitive receptor areas, and use of electric air compressors and similar power tools, rather than diesel equipment, will be used. • Noise attenuation measures, which may include temporary noise barriers or noise blankets around stationary construction noise sources, will be implemented. • During construction, stationary construction equipment will be placed such that emitted noise is directed away from or shielded from sensitive receptors.	**MM-NOI-1** Prior to commencement of construction activities, temporary noise barriers shall be constructed at the Project Site boundaries adjacent to residential land uses and other noise-sensitive land uses. The temporary sound barrier (minimum STC 25) shall be designed to provide a minimum 15-A-weighted decibels noise reduction at the adjacent residences.	SU

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
zone. Therefore, temporary noise impacts associated with the Project's on-site construction would be significant. The proposed Project would result in temporary increases in traffic from worker vehicles and construction-related trucks. Average traffic noise levels are not anticipated to increase as a result of the Project. Therefore, temporary noise impacts from off-site construction traffic would be less than significant.	• During construction, stockpiling and vehicle staging areas will be located away from noise sensitive receptors, while being located on the building sites or on existing developed areas. • Where power poles are available, electricity from power poles and/or solar powered generators rather than temporary diesel of gasoline powered generators will be used during construction. • If diesel- or gasoline- powered generators are used, such equipment will be located at least 100 feet away from off-site sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible, and flexible sound control curtains will be placed around the equipment when in use. • Construction hours, allowable workdays, and the phone number of the job superintendent will be clearly posted at all construction entrances to allow surrounding property owners and residents to contact the job superintendent if necessary. In the event the City receives a complaint, appropriate corrective actions will be implemented and a report of the action provided to the reporting party.		

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
Operational Noise: The noise from the proposed parking structure would not result in a 5-dBA increase, on either an L_{eq} or a CNEL basis. Additionally, on-site stationary equipment would be subject to LAMC Section 112.02, which, as detailed previously, establishes maximum permitted noise levels for powered equipment or powered hand tools. Thus, the equipment would not exceed the maximum permitted noise levels. Further, noise from emergency vehicle sirens would be relatively brief and periodic in nature and would cease once the emergency vehicles either enter or exit the area. Loading docks and refuse collection areas would be completely enclosed at all sides and would shield the surrounding sensitive receptors from any noise from loading/unloading and refuse operations. Noise effects from vehicular traffic associated with a variety of Project-related operational scenarios would increase existing noise levels by 1 decibel or less as a result of implementing the proposed Project, which is a barely audible change. Therefore, operational impacts would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS
Construction Vibration: Construction of the proposed Project would result in groundborne vibration from heavy equipment. Both conventional construction activities and pile driving would exceed FTA vibration thresholds when conducted adjacent to sensitive	**PDF-NOI-2** The following Project characteristics pertaining to vibration during construction will be implemented and adhered to: • When vibration intensive activities, such as excavation, drilling, shoring,	No mitigation measures are feasible.	SU

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
receivers. Additionally, impact-type pile driving activities are estimated to result in vibration levels exceeding the FTA impact criteria at the adjacent Metro B Line tunnel and the Vermont/Sunset Station. Therefore, vibration impacts during construction of the Project to off-site building structures and off-site receptors would be significant. Groundborne vibration impacts related to off-site construction activities would be limited to Project-related vehicle and truck pass-bys along the local roadways. Impacts that would result from temporary and intermittent off-site vibration from construction activities is considered to be less than significant.	etc., occur within 100 feet of vibration-sensitive structures, the contractor will install and maintain at least one continuously operational automated vibrational monitor on or immediately adjacent to the sensitive structure. The monitors must be capable of being programmed with predetermined vibratory velocity levels and transmitting an alarm to on-site personnel with authorization to halt work in the vicinity so that strategies to reduce vibratory impacts can be implemented. It is recommended that a level of 90 percent of the structure damage threshold (0.12 inches/second [in/sec] peak particle velocity [PPV]) be utilized (0.108 in/sec PPV). Strategies to reduce vibratory impacts will include, but not limited to, halting/staggering concurrent activities, creating a larger set back distance, or utilizing lower-vibratory (typically smaller) equipment or techniques.		
Operational Vibration: The primary anticipated source of vibration from operation of the proposed Project would be off-site vehicular trips. Any such mechanical equipment with the potential to create substantial vibration would be isolated and/or otherwise prevented from imparting that vibration into the ground	No project design features are applicable.	No mitigation measures are necessary.	LTS

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SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
because the machine could be damaged or cause damage to the base upon which it is fastened. Therefore, impacts would be less than significant.			
IV.K Population and Housing			
Population Growth: The Project would result in approximately 1,807 new employees under the 2030 buildout. The City is projected add 128,924 employees from the 2017 baseline year to 2030 (Project buildout year). As such, the Project's approximately 1,807 new employees would represent 1.4 percent of new employment projected in the City of Los Angeles SCAG subregion between 2017 and 2030 (Project buildout). Thus, the increase in employment anticipated with implementation of the proposed Project would not exceed the employment forecast provided by SCAG for the City of Los Angeles subregion.	No project design features are applicable.	No mitigation measures are necessary.	LTS
IV.L.1 Public Services- Fire Protection			
Fire Protection: Construction activities associated with the Project may temporarily increase demand for fire protection services. Nonetheless. construction of the Project would not be considered a high-risk activity, and the Los Angeles Fire Department (LAFD) is equipped and prepared to deal with construction-related traffic and fires, should they occur. Upon completion, compliance with Los Angeles	**PDF-TRF-1** (see Section IV.M, Transportation)	No mitigation measures are necessary.	LTS

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
Building Code and Fire Code requirements would ensure that adequate fire prevention features are provided, which would reduce the demand on LAFD facilities and equipment.			
IV.L.2 Public Services- Police Protection			
Police Protection: Appropriate precautions for security during construction would be taken to reduce the need for police protection. Upon implementation of the Project, the ratio would remain one officer to 1,00 residents. Therefore, this increase in residents would not substantially affect police response times nor result in the need for new police facilities and, thus, is nominal.	**PDF-POL-1:** During construction, Kaiser Permanente shall implement appropriate temporary security measures, including security fencing (e.g., chain-link fencing), low-level security lighting, and locked entry (e.g., padlocked gates or guard-restricted access) to limit access by the general public. Regular security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) shall also be provided. During construction activities, the Project Contractor shall document the security measures, and the documentation shall be made available to the Construction Monitor. **PDF-TRF-1** (see Section IV.M, Transportation)	No mitigation measures are necessary.	LTS
IV.L.3 Public Services- Schools			
Schools: Construction employment generated by the Project would be temporary and would not result in impacts to schools. Once	No project design features are applicable.	No mitigation measures are necessary.	LTS

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
operational, the Project would generate 187 additional students to the Los Angeles Unified School District (LAUSD) schools in the vicinity of the Project Site. Payment of the applicable school fees to LAUSD would allow LAUSD to provide adequate school facilities, and impacts would be less than significant.			
IV.L.4 Public Services- Parks and Recreation			
Parks and Recreation: Construction employment generated by the Project would be temporary and would not result in impacts to parks. The Project's new employees would not change the park service ratio. Therefore, impacts would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS
IV.L.5 Public Services- Libraries			
Libraries: Construction employment generated by the Project would be temporary and would not result in impacts to libraries. The Project would nominally change the service population to all library branches serving the Project Site and would not impact library facilities.	No project design features are applicable.	No mitigation measures are necessary.	LTS
IV.M Transportation			
Conflict with Program, Plan, Ordinance, or Policy: The Project would not conflict with the plans and policies included in the Mobility Plan 2035, Plan for Healthy LA, Hollywood	No project design features are applicable.	No mitigation measures are necessary.	LTS

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SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
Community Plan, Vision Zero Action Plan, or Citywide Design Guidelines. In addition, the Project would include a Transportation Demand Management (TDM) Program consistent with LAMC Section 12.26J, as well as Mobility Hub elements, such as bicycle parking and electric vehicle infrastructure. Therefore, impacts would be less than significant.			
Vehicle Miles Traveled (VMT): The proposed Project's daily work VMT per employee is estimated to total 7.4, which is lower than the established threshold of 7.6 daily work VMT per employee for the Central Area Planning Commission. Therefore, impacts would be less than significant.	**PDF-TRF-2** The following Transportation Demand Management (TDM) strategies would be implemented to comply with the City's existing Transportation Demand Management and Trip Reduction Measures Ordinance (Ordinance No. 168700): • Education & Encouragement: Promotions and Marketing (TDM Strategy C) – Include voluntary travel behavior change program, such as distributing information through the media, the internet, newsletters, public notices, and the travel feedback program. – Include promotion and marketing strategies to influence public attitudes about issues related to transportation and promote a range of travel demand management techniques available to the proposed Project; this could be implemented via an on-site	No mitigation measures are necessary.	LTS

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SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	Transportation Information Center. Organizing transit, walk or bike to work events, administrative support for the formation of carpools/ vanpools, guaranteed ride home programs for employees, and allowing for flexible and alternative work schedules could be included as these strategies. • Bicycle Infrastructure (TDM Strategy F): – Include Bike Parking Per Los Angeles Municipal Code – Include Secure Bike Parking and Showers • Neighborhood Enhancement: Pedestrian Network Improvements (TDM Strategy G) – Include pedestrian network improvements, which may include traffic calming improvements, such as marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, roundabouts or mini-circles, on-street parking, planter strips with street trees, chicanes/chokers, etc. – Include applicable pedestrian network improvements that link all uses and connects to all existing or		

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	planned external streets and pedestrian facilities contiguous with the Project Site.		
Hazards Due to Design Features: Based on a review of the proposed Project driveways associated with the future development sites, none of the new Project driveways would intersect an on-street bicycle lane or cross a sidewalk in a high pedestrian area. Additionally, of the proposed Project driveways associated with the future development sites, no readily perceived access risks or deficiencies associated with the adjoining street system due to curves, slopes, walls or other barriers to adequate lines of sight are present. Therefore, impacts would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS
Emergency Access: All Project driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the proposed Project. Therefore, impacts would be less than significant.	**PDF-TRF-1** The following measures shall be implemented as part of the Construction Staging and Traffic Management Plan (CSTMP), to be prepared by Kaiser Permanente: 1. Provide advanced notification to adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction. Provide a posted sign on the Project Site with hotline information for adjacent property owners to call and address specific	No mitigation measures are necessary.	LTS

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	issues or activities that may potentially cause problems at on- and off-site locations. 2. Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses. 3. Coordinate with public transit agencies to provide advanced notifications of any temporary stop relocations and durations and follow all safety required procedures required by the concerned agency. 4. Limit any potential roadway lane closure/s to off-peak travel periods, to the extent feasible. 5. Provide traffic control for any potential roadway lane closure, detour, or other disruption to traffic circulation. 6. To the extent feasible, store any construction equipment within the perimeter fence of the construction site. Should temporary storage of a large piece of equipment be necessary outside of the perimeter fence (e.g., within a designated lane closure area), that area must comply with City-approved detour/traffic control plans.		

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	7. Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers; 8. Identify and require the routes that construction vehicles would use for the delivery of construction materials (e.g., lumber, tiles, piping, windows), to access the project site, traffic controls and detours, and proposed construction phasing plan for the Project. 9. Require Kaiser Permanente to keep all haul routes adjacent to the Project Site clean and free of debris including, but not limited to, gravel and dirt as a result of its operations. 10. Schedule delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods, to the extent possible. No hauling or transport shall be allowed during nighttime hours, Sundays, or federal holidays unless required by the California Department of Transportation (Caltrans) or Los Angeles Department of Transportation (LADOT); 11. Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities, if needed.		

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	12. Haul trucks entering or exiting public streets shall at all times yield to public traffic. 13. Construction-related parking and staging of vehicles shall occur on-site to the extent possible, but may occur on nearby public parking lots, as approved by the City. 14. Coordinate deliveries to reduce the potential of trucks waiting to unload for protracted periods of times. 15. Prohibit parking by construction workers on adjacent streets and direct construction workers to available/designated parking areas within and adjacent to the Project Site. 16. The CSTMP shall meet standards established in the current California Manual on Uniform Traffic Control Device as well as City of Los Angeles requirements.		
IV.N Tribal Cultural Resources			
Tribal Cultural Resources: No previously recorded archaeological resources of Native American origin or Tribal Cultural Resources (TCRs) listed in the California Register of Historic Resources or a local register or in any other of the records reviewed were identified within the Project site. Therefore, the Project's impact to TCRs would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
IV.O.1 Utilities – Water Supply and Infrastructure			
Water Facilities: Impacts associated with the construction of new water distribution lines would primarily be related to trenching in order to install and/or remove underground lines. Prior to ground disturbance, Project contractors would coordinate with Los Angeles Department of Water and Power (LADWP) to identify the locations and depth of all lines Once operational, on-site water facilities would be connected to existing water mains in adjacent streets. The service laterals would be adequately sized to accommodate the on-site fire suppression system demand and domestic demand flowing simultaneously. The new water services would also include backflows and be metered separately per City requirements. Therefore, impacts would be less than significant.	**PDF-WTR-1**: The Project will include installation of new service laterals and meters for fire water, domestic water, and irrigation uses, as needed to connect to the existing water mainlines adjacent to the proposed building sites, as determined by the Los Angeles Department of Water and Power and Los Angeles Department of Public Works. Project-related infrastructure will be designed and installed to meet all applicable City requirements.	No mitigation measures are necessary.	LTS
Water Supply: Option A and Option B would result in a net increase in domestic water demand of 124,771 gallons per day (gpd) (140 acre-feet per year [AFY]) and 99,193 gpd (111 AFY), respectively. The anticipated Project water demand has been accounted for in the City's overall total demand projections in the LADWP 2015 Urban Water Management Plan, using a service area-wide approach that does not rely on individual development demand. Therefore, the maximum of 140 AFY increase in net water demand of the proposed Project,	**PDF-HYD-1** through **PDF-HYD-10**	No mitigation measures are necessary.	LTS

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
through the year 2040, fits within the LADWP's projection of growth and water demand totals throughout normal, single-dry, and multiple dry years. Impacts would be less than significant.			
IV.O.2 Utilities – Wastewater			
Wastewater Facilities: Wastewater from the Project would be conveyed to the Hyperion Water Reclamation Plant (HWRP). As the HWRP would have adequate capacity to treat proposed Project wastewater, impacts would be less than significant. Impacts associated with the construction of new sewer lines and associated laterals in the vicinity of the Project site would primarily be related to trenching in order to install and/or remove the below-ground lines. All construction work within the City public right-of-way would be subject to Los Angeles Municipal Code requirements. The property owner/developer must comply with the Construction General Permit applicable at the time a grading permit is issued. Therefore, impacts would be less than significant.	**PDF-HYD-2** through **PDF-HYD-5**	No mitigation measures are necessary.	LTS
Adequate Capacity: Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LA Sanitation and Environment (LASAN) and California Plumbing Code standards. Furthermore, in accordance with LAMC Sections 64.11 and 64.16.1, the Project would pay the required sewer connection fees to	**PDF-HYD-2** through **PDF-HYD-5**	No mitigation measures are necessary.	LTS

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
help offset the Project's contribution to the City's wastewater collection infrastructure needs and would require approval of sewer permits prior to connection to the sewer system. Therefore, impacts would be less than significant.			
IV.O.3 Utilities – Solid Waste			
Excess of Standards: State and local regulations require that 50 percent of construction and demolition (C&D) solid waste be recycled, as well as implementing a zero waste goal for operational activities. The C&D debris associated with the Project would primarily be classified as inert waste and would be recycled in accordance with City of Los Angeles Ordinance 181519. As such, impacts would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS
Compliance with Regulations: The Project is predicted to generate approximately 7.7 tons/day for Option A and 8.1 tons/day for Option B. Based on projected adequacy of landfill space, in combination with compliance with existing regulatory standards and the City of Los Angeles Hospital Best Management Practices manual, which requires recycling of most of the solid waste generated during operations, the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the	**PDF-SW-1** Hospital operations would be completed in accordance with the City of Los Angeles Hospital Best Management Practices manual (LASAN 2014), which focuses on ways to reduce, reuse, and recycle during operations. This manual reflects Best Management Practices (BMPs) being implemented throughout the healthcare system, most of which are actual practices and others are feasible programs that may be logistically difficult to implement on a facility-wide basis, such as having a mixed recycling collection system in	No mitigation measures are necessary.	LTS

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
attainment of solid waste reduction goals. As such, impacts would be less than significant	every department. BMPs would be enforced by the City of Los Angeles as part of the Zero Waste LA Franchise System.		
IV.O.4 Utilities- Electric Power, Natural Gas, and Telecommunications			
Utilities: Installation of new electricity, natural gas, and telecommunication equipment and associated upgrades may be required as part of the Project. This task may mandate additional off-site infrastructure improvements, which have been evaluated as part of this Draft EIR and were determined to be less than significant. As such, impacts would be less than significant.	No project design features are applicable.	No mitigation measures are necessary.	LTS
IV.P Energy			
Energy Requirements: The Project would not cause wasteful, inefficient, and unnecessary consumption of energy during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or require additional capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would also be sufficient to meet the needs of Project-related construction and operations. During operations, the Project will comply with existing energy	No project design features are applicable.	No mitigation measures are necessary.	LTS

TABLE I-1
SUMMARY OF ENVIRONMENTAL IMPACTS

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
efficiency requirements such as CalGreen as well as include energy conservation measures beyond requirements. In summary, the Project's energy demands would not significantly affect available local and regional energy supplies, would comply with existing energy efficiency standards, and would not require additional capacity. Therefore, Project impacts related to energy use would be less than significant during construction and operation.			

NOTES: LTS = Less Than Significant Impact; LTS w/M = Less Than Significant Impact with Mitigation Incorporated; SU = Significant and Unavoidable Impact.
[1] Society of Vertebrate Paleontology (SVP), Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010.

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