

Appendix A

Initial Study/ Notice of Preparation and Comments

A-1 Initial Study



CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

INITIAL STUDY

Kaiser Permanente Los Angeles Medical Center Project

Case Number: ENV-2015-4476-EIR

Project Addresses: 1317, 1321, 1329, & 1345 North Vermont Avenue; 1328 North New Hampshire Avenue; 4760 Sunset Boulevard; 1505 North Edgemont Street; 1526 North Edgemont Street; 1517 North Vermont Avenue; 1430 & 1424 North Alexandria Avenue Los Angeles, California 90027.

Community Plan Area: Hollywood

Council District: 13—O'Farrell

Project Description: The Project proposes to expand the existing Kaiser Permanente Los Angeles Medical Center (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 the demolition of existing commercial and duplex structures at 1345 North Vermont Avenue and the construction of a parking structure and medical office building at 1321 North Vermont Avenue, 1345 North Vermont Avenue, and 1328 North New Hampshire Avenue; construction of a procedure center addition to the 4760 Sunset Boulevard building; and demolition of the 1505 North Edgemont Street and 1526 North Edgemont Street medical office buildings. The second phase of the development would include the demolition and reconstruction of the 1517 North Vermont Avenue parking structure and construction of an addition to the existing hospital at 4867 Sunset Boulevard or, alternatively, construction of a medical office building at 1526 North Edgemont Street. The third phase of the development would include the construction of an addition to the 4950 Sunset Boulevard parking structure and construction of a new medical office building at 1505 North Edgemont Street. The proposed buildings would total 427,400 square feet (sf) with an additional 655,015 sf of parking structure area, for a total of 1,082,415 sf.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Dudek

APPLICANT:
Kaiser Foundation Hospitals

September 2017

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ACRONYMS AND ABBREVIATIONS

BAAQMD	Bay Area Air Quality Management District
CEQA	California Environmental Quality Act
City	City of Los Angeles
CMP	Congestion Management Program
EIR	environmental impact report
GHG	greenhouse gas
LAMC	Los Angeles Municipal Code
Medical Center	Kaiser Permanente Los Angeles Medical Center
MOB	Medical Office Building
sf	square feet
SNAP	Station Neighborhood Area Plan

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK

ROOM 395, CITY HALL

LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY AND APPENDIX G CHECKLIST

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
City of Los Angeles Department of City Planning	13, Mitch O'Farrell	September 21, 2017
RESPONSIBLE AGENCIES		
Southern California Air Quality Management District; Los Angeles Regional Water Quality Control Board		
PROJECT TITLE/NO.	CASE NOS.	
Kaiser Permanente Los Angeles Medical Center Project	ENV-2015-4476-EIR CPC-2017-846-SP VTT-74846 VTT-74847 VTT-74848	

PROJECT LOCATION

1317, 1321, 1329, & 1345 North Vermont Avenue; 1328 North New Hampshire Avenue; 4760 Sunset Boulevard; 1505 North Edgemont Street; 1526 North Edgemont Street; 1517 North Vermont Avenue; 1430 & 1424 North Alexandria Avenue, Los Angeles, California, 90027. See Figure 2.

APPLICANT NAME AND ADDRESS	PHONE NUMBER
Kaiser Foundation Hospitals 393 East Walnut Street, 4 th Floor 043W02 Pasadena, CA 91188	626-405-5385

PROJECT DESCRIPTION:

The Project proposes to expand the existing Kaiser Permanente Los Angeles Medical Center (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 the demolition of existing commercial and duplex structures at 1345 North Vermont Avenue and the construction of a parking structure and medical office building at 1321 North Vermont Avenue, 1345 North Vermont Avenue, and 1328 North New Hampshire Avenue; construction of a procedure center addition to the 4760 Sunset Boulevard building; and demolition of the 1505 North Edgemont Street and 1526 North Edgemont Street medical office buildings. The second phase of the development would include the demolition and reconstruction of the 1517 North Vermont Avenue parking structure and construction of an addition to the existing hospital at 4867 Sunset Boulevard or, alternatively, construction of a medical office building at 1526 North Edgemont Street. The third phase of the development would include the construction of an addition to the 4950 Sunset Boulevard parking structure and construction of a new medical office building at 1505 North Edgemont Street. The proposed buildings would total 427,400 square feet (sf) with an additional 655,015 sf of parking structure area, for a total of 1,082,415 sf. See Attachment A for a detailed project description.

ENVIRONMENTAL SETTING:

The approximate 15.34-acre Kaiser Los Angeles Medical Center is located along Sunset Boulevard between North Alexandria Avenue and North Vermont Avenue in the Hollywood Community Plan Area of the City of Los Angeles. See Attachment A for a detailed explanation of the environmental setting.

SURROUNDING LAND USES:

Land uses generally surrounding the Kaiser Los Angeles Medical Center include open space, specifically Barnsdall Art Park to the north; commercial uses to the northeast along North Vermont Avenue; residential and commercial uses to the east and southeast, including the Children's Hospital of Los Angeles and the Hollywood Presbyterian Medical Center along Sunset Boulevard and North Vermont Avenue; residential and commercial uses to the south, including the Church of Scientology of Los Angeles; and residential and commercial uses to the west. See Attachment A for more details about the surrounding land uses.

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

Outreach to California Native American tribes traditionally and culturally affiliated with the project area began on August 17, 2017. No requests for consultation have been received to date.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Recreation |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Hydrology / Water Quality | <input checked="" type="checkbox"/> Transportation / Traffic |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Land Use / Planning | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Utilities / Service Systems |
| <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Noise | <input checked="" type="checkbox"/> Mandatory Findings of Significance |
| <input checked="" type="checkbox"/> Geology / Soils | <input checked="" type="checkbox"/> Population / Housing | |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Public Services | |

DETERMINATION (to be completed by Lead Agency)

On the basis of this initial evaluation:

-
- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
-
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
-
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
-
- I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
-
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.
-

Alejandro A. Huerta

PRINTED NAME



SIGNATURE

City Planning Associate

TITLE

213-978-1454

TELEPHONE NUMBER

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, “Earlier Analysis,” cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VI. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

VII. GREENHOUSE GAS EMISSIONS. Would the project:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

- a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?
- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including, where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands, caused in whole or in part from the project's exacerbation of existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IX. HYDROLOGY AND WATER QUALITY. Would the project:

- a. Violate any water quality standards or waste discharge requirements?
- b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?
- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?
- d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
- e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
- f. Otherwise substantially degrade water quality?
- g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
- h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?
- i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- j. Inundation by seiche, tsunami, or mudflow?

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XI. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XII. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

XIII. POPULATION AND HOUSING. Would the project:

- a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
- c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- a. Fire protection?
- b. Police protection?
- c. Schools?
- d. Parks?
- e. Other public facilities?

XV. RECREATION.

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

XVI. TRANSPORTATION/TRAFFIC. Would the project:

- a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XVII. TRIBAL CULTURAL RESOURCES.

- a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
 - ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

XVIII. UTILITIES AND SERVICE SYSTEMS.

Would the project:

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XIX. MANDATORY FINDINGS OF SIGNIFICANCE.

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Initial Study

Attachment A: Project Description

Project Summary

The Project proposes to expand the existing Kaiser Permanente Los Angeles Medical Center (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 the demolition of existing commercial and duplex structures at 1345 North Vermont Avenue and the construction of a parking structure and medical office building at 1321 North Vermont Avenue, 1345 North Vermont Avenue, and 1328 North New Hampshire Avenue; construction of a procedure center addition to the 4760 Sunset Boulevard building; and demolition of the 1505 North Edgemont Street and 1526 North Edgemont Street medical office buildings. The second phase of the development would include the demolition and reconstruction of the 1517 North Vermont Avenue parking structure and construction of an addition to the existing hospital at 4867 Sunset Boulevard or, alternatively, construction of a medical office building at 1526 North Edgemont Street. The third phase of the development would include the construction of an addition to the 4950 Sunset Boulevard parking structure and construction of a new medical office building at 1505 North Edgemont Street. The proposed buildings would total 427,400 square feet (sf) with an additional 655,015 sf of parking structure area, for a total of 1,082,415 sf.

A. Environmental Setting

1. Project Location

The approximate 15.34-acre Medical Center Project site is located along Sunset Boulevard between North Alexandria Avenue and North Vermont Avenue in the Hollywood Community Plan Area of the City of Los Angeles, California, 90027. The Project area is generally located northeast of the Hollywood Freeway (U.S. Highway 101) and southwest of Interstate 5 (Figure 1 Regional and Vicinity Map).

In this document, the term “Medical Center campus” refers to the entirety of the Kaiser facility, which is within the Unified Hospital Development boundary shown in Figure 2, Unified Hospital Development Boundary. The properties that are proposed for redevelopment under the Project are also within this boundary. The existing Medical Center campus consists of a collection of medical buildings and parking structures, several of which are proposed for demolition as part of the Project. The Medical Center campus includes other structures that would remain in place (Figure 3 Existing Site Plan and Proposed Demolition).

In this document, the term “Project site” refers to the properties on which the proposed redevelopment would occur. These properties are outlined in Figure 4, Proposed Site Plan, as the “Proposed Project/Building Sites.” As shown in Figure 4 Proposed Site Plan, the proposed building sites are:

- Site 1: 1317, 1321, 1329, & 1345 North Vermont Avenue, 1328 North New Hampshire Avenue
- Site 2: 4760 Sunset Boulevard
- Site 3: 1505 North Edgemont Street
- Site 4: 1526 North Edgemont Street
- Site 5: 1517 North Vermont Avenue
- Site 6: 1430 & 1424 North Alexandria Avenue

Zoning and General Plan Designations

The Project site is primarily designated Community Commercial in the Hollywood Community Plan and is zoned C2-CSA1 (Commercial – Centers Study Area, Height District 1) with the following exceptions. The western portion of Site 1 (1328 North New Hampshire Avenue) is designated Community Commercial and is zoned R4-1 (Multiple Dwelling Zone, Height District 1). The northern portion of Site 4 is zoned PB-1 (Parking Building). The entirety of Site 6 is designated Low Medium II Residential and is zoned RD2-1XL (Restricted Density Multiple Dwelling Zone, Height District 1XL). See Figure 5, Land Use Designations, and Figure 6, Zoning.

The Project site is within a Transit Priority Area (ZI No. 2452), and the State Enterprise Zone (ZI No. 2374). All properties within the Project site are within the Vermont/Western Transit Oriented District Specific Plan Area/Station Neighborhood Area Plan (SNAP), Subarea C (Community Center), with the exception of Site 6, which is not within the SNAP boundaries. In addition, all properties are within the East Hollywood Property and Business Improvement District, with the exception of Site 6 and the western portion of Site 1.

2. Existing Conditions

Table 1-1, Project Summary Table, on page 27 lists the existing uses at each site that is proposed for redevelopment.

3. Surrounding Land Uses

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

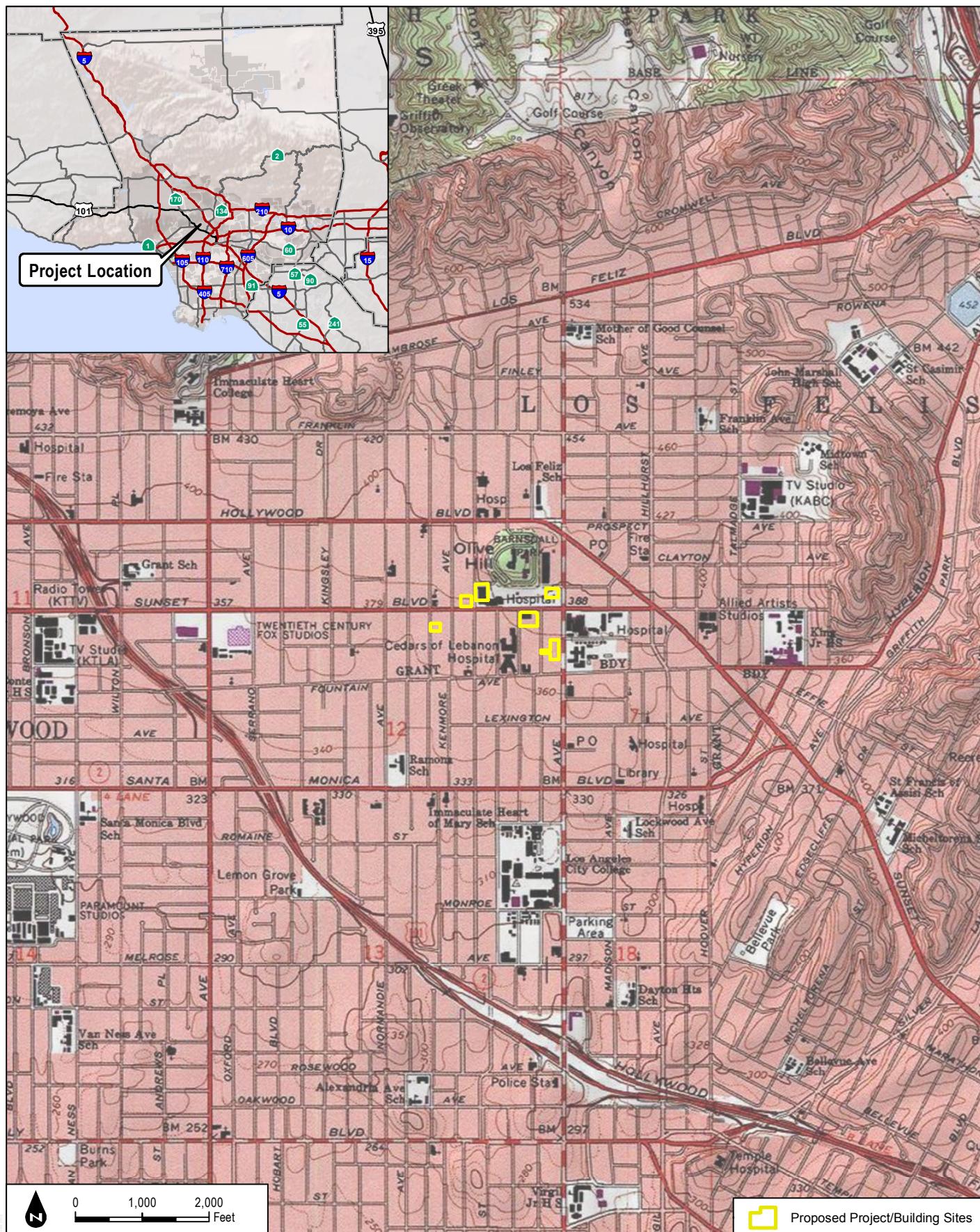


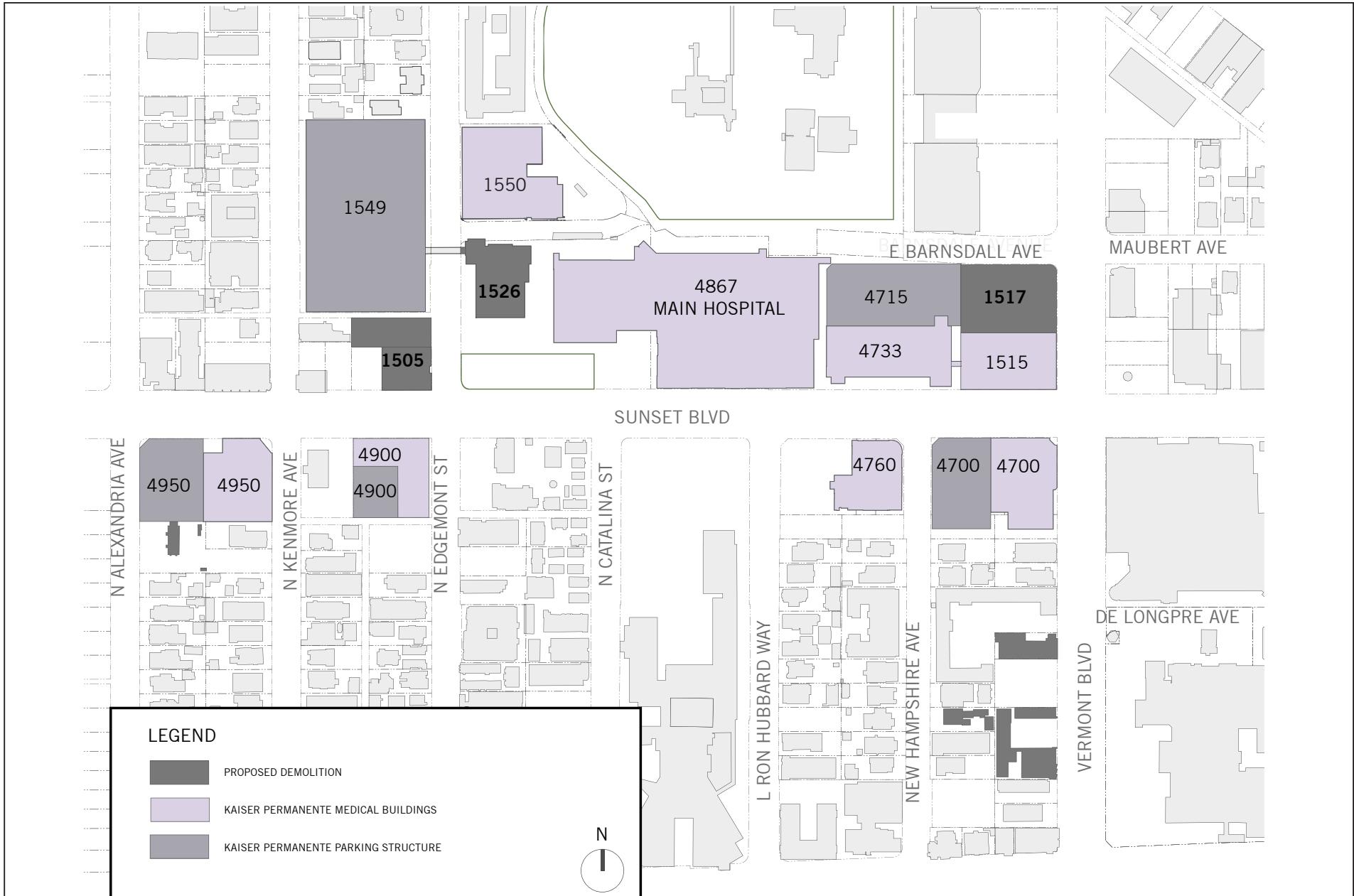
FIGURE 1
Regional and Vicinity Map



SOURCE: Bing Maps 2017

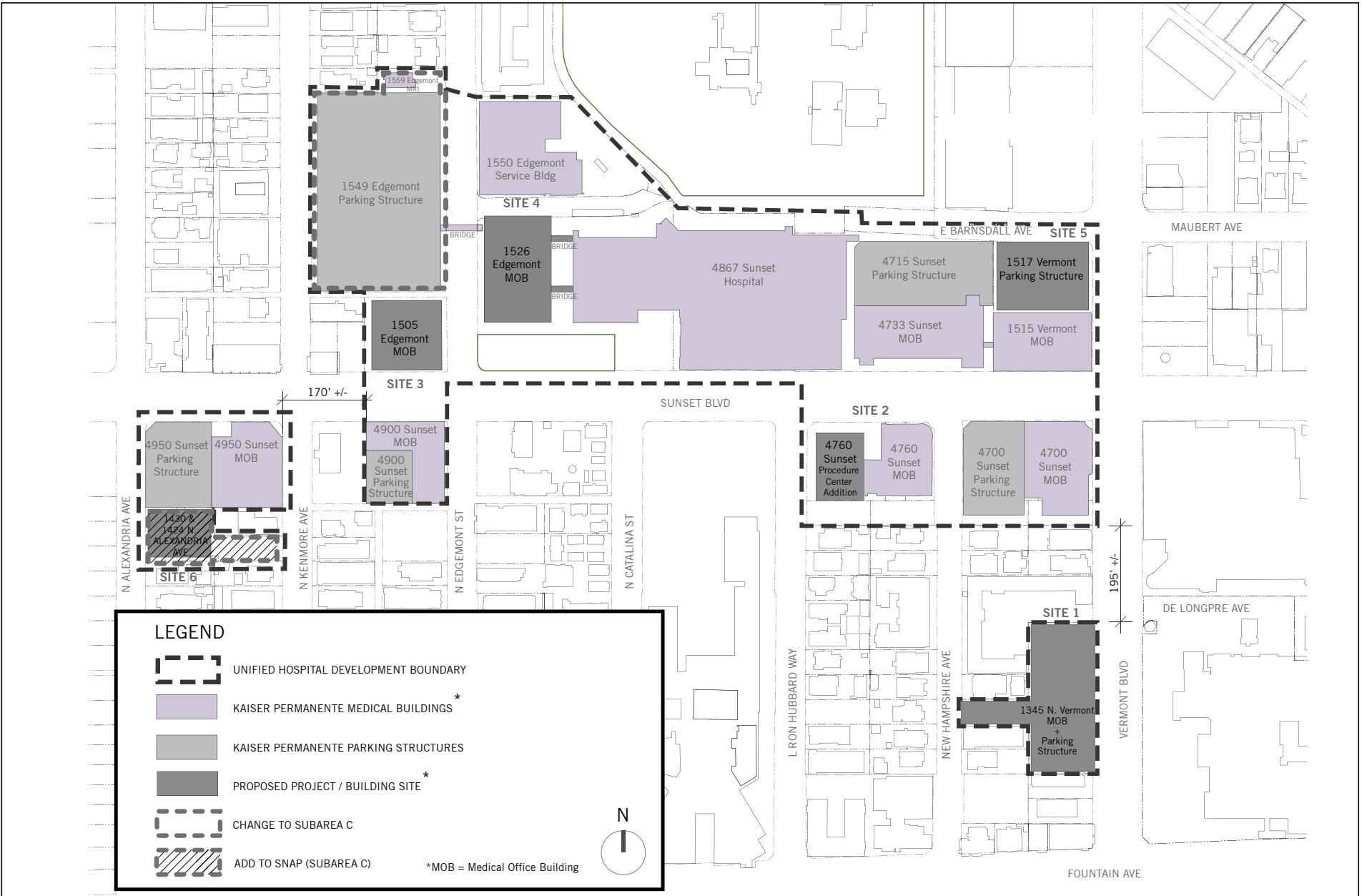
Kaiser Permanente Los Angeles Medical Center Project

FIGURE 2
Unified Hospital Development Boundary



SOURCE: Perkins and Will, 2017

FIGURE 3
Existing Site Plan and Proposed Demolition



SOURCE: Perkins and Will, 2017

Kaiser Permanente Los Angeles Medical Center Project

FIGURE 4
Proposed Site Plan

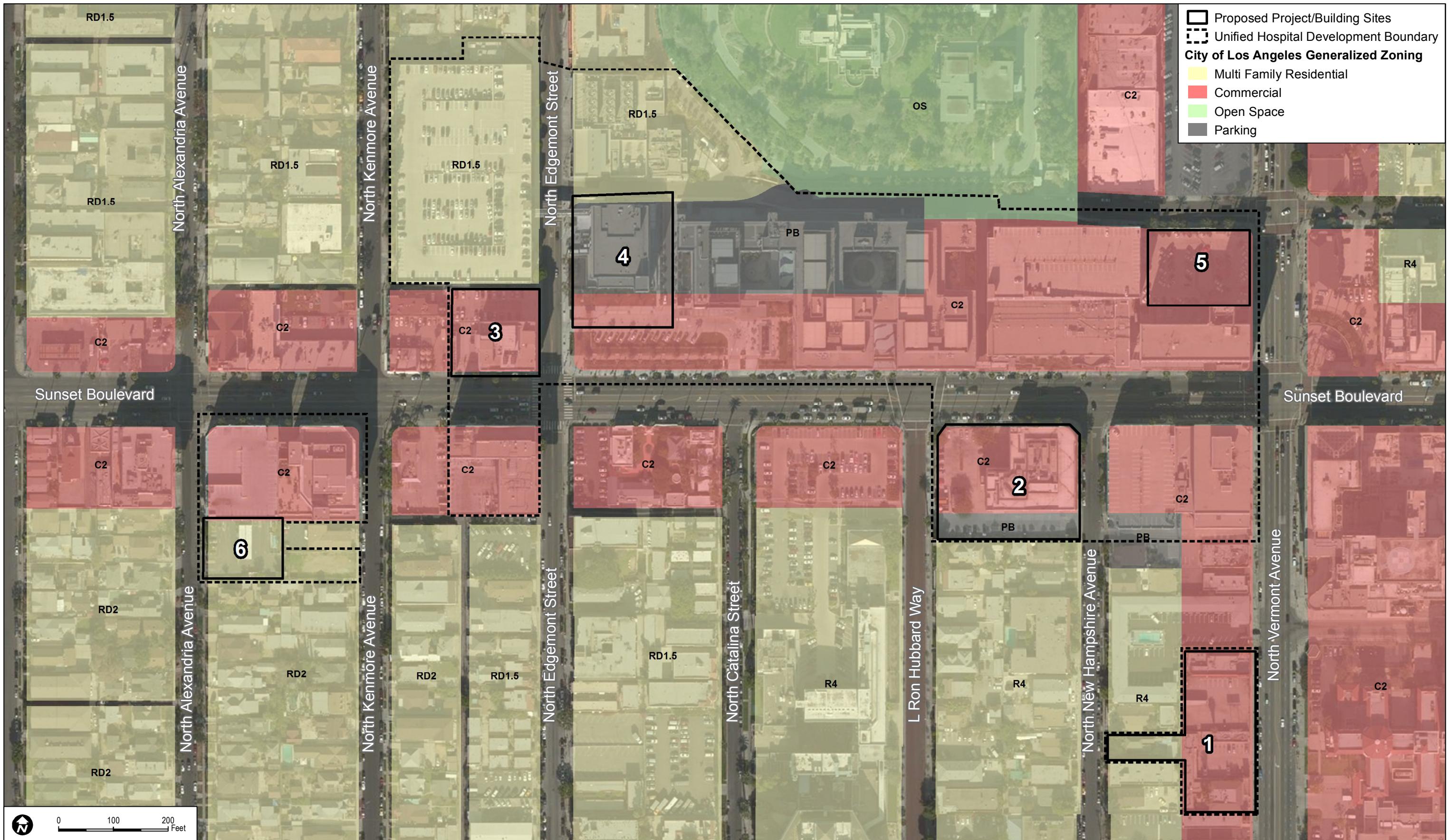


SOURCE: Perkins and Will, 2017; Bing Maps 2017

Kaiser Permanente Los Angeles Medical Center Project

FIGURE 5

Land Use Designations



SOURCE: Perkins and Will, 2017; Bing Maps 2017

Kaiser Permanente Los Angeles Medical Center Project

FIGURE 6
Zoning

B. Project Description

1. Project Overview

Kaiser Permanente is proposing to replace medical office buildings of the Kaiser Permanente Medical Center campus and to build new health care facilities on adjacent parcels of land. The Project would proceed under a Master Plan/Development Plan Permit. The Project is proposed to be implemented in three phases and would include new and replacement medical office buildings, procedure centers, hospital additions, and parking structures on the Project site, as discussed in detail below.

The existing Medical Center campus site is approximately 2 million sf. The total building area to be demolished is 215,408 sf. The total building area to be constructed is 427,400 sf. The total parking area to be demolished is 19,199 sf. The total parking area to be constructed is 655,015 sf. The Project's phased development would occur between 2020 and 2030. The Project will be developed in up to three phases. For all phases of the Project, worst-case assumptions are used to evaluate potential effects. The following sections describe each of the Project phases. The components of each phase are summarized in Table 1-1 on page 27.

Phase 1: Construct Medical Office Building (MOB) and Parking Structure on Site 1, Construct Procedure Center Addition on Site 2, and Demolish MOBs at Site 3 and Site 4

Phase 1 of the Project would commence in 2020 and be completed by 2024. During Phase 1, the existing commercial and residential structures totaling approximately 15,517 sf at Site 1 would be demolished and replaced with a building containing structured parking and an MOB. The building would have a maximum height of 129 feet (nine stories; five above grade, four below grade). The parking structure portion would be 285,870 sf and would provide a total of 582 parking stalls. The parking structure portion of the building would also include retail space on the ground floor. The MOB portion would be 128,500 sf.

Phase 1 would also include the concurrent construction of a new 50,000-sf, four-story Procedure Center addition at Site 2 for expanded outpatient perioperative space, as well as an expanded/relocated Gastrointestinal Clinic and Procedural Lab. The Procedure Center addition would expand an existing 60,000-sf, three-story MOB at 4760 Sunset Boulevard, for a total of 110,000 sf of medical office space at the 4760 Sunset Boulevard property. The addition would replace an existing 39-stall surface parking lot. Ten parking stalls would remain at Site 2 after project implementation. The Procedure Center Addition would have a maximum height of 100 feet (four stories) above grade.

Additionally, as part of Phase 1, the existing eight-story, 120,556-sf MOB located on Site 4 would be demolished. Finally, as part of Phase 1, the existing seven-story, 79,335-sf MOB located on Site 3 would be demolished.

Phase 2: Demolish and Replace the Parking Structure at Site 5, New MOB OR Hospital Addition at Site 4

Phase 2 of the Project would commence in 2024 and be completed by 2028. As part of Phase 2, the existing two-story, 19,199-sf, 186-stall parking structure located at Site 5 would be demolished and replaced with a new 636-stall, 246,566-sf parking structure that would be approximately 90 feet in height above grade (10 stories; eight above grade and two below grade). The parking structure would have 2,300 sf of commercial retail space on the ground floor. Concurrently, the existing MOB on Site 4, which is proposed for demolition under Phase 1, would be replaced with a 132,700-sf MOB having a maximum height of 89 feet above grade (six stories; five above grade and one below grade). Alternatively, this same site would be used for an addition to the existing adjacent hospital at 4867 Sunset Boulevard. The hospital expansion would total 161,600 sf, and the structure would be 105 feet in height above grade (six stories; five above grade and one below grade). The hospital addition would support 105 beds. To ensure a conservative environmental analysis, this Initial Study will analyze both the MOB and hospital additions, but will draw its impact conclusions from the worst-case scenario (i.e., the option with the maximum intensity of uses, which would result in the most environmental impacts).

Phase 3: Construct Parking Structure Addition at Site 6 and Construct New Medical Offices on Site 3

Phase 3 of the Project would commence in 2028 and be completed by 2030. A 200-stall parking structure addition would be constructed on Site 6, on the south side of the existing 4950 Sunset Boulevard parking structure. The existing parking structure at 4950 Sunset Boulevard has 519 stalls and would remain. The height of the parking structure addition would be 90 feet (eight stories above grade).

New medical offices totaling 85,000 sf would be constructed at Site 3. The existing MOB would be demolished during Phase 1. The new medical office structure at this property would be 85 feet in height (five stories).

**Table 1-1
Project Summary Table**

Existing Uses to be Removed	Proposed Uses
Phase 1 (2020–2024)	
<i>Site 1: New MOB and Parking Structure</i>	
<ul style="list-style-type: none">15,517 sf of single-story commercial and residential structures (6 structures in total); surface parking lots	<ul style="list-style-type: none">MOB (128,500 sf) and 582-stall parking structure (285,870 sf)129 feet in height (9 stories; 5 above grade, 4 below grade)
<i>Site 2: Procedure Center Addition</i>	
<ul style="list-style-type: none">39 surface parking stalls	<ul style="list-style-type: none">50,000-sf Procedure Center addition to an existing MOB at 4760 Sunset Boulevard (for a total of 110,000-sf medical office space at this property); 10 parking stalls to remain100 feet in height (4 stories) above grade

Table 1-1
Project Summary Table

Existing Uses to be Removed	Proposed Uses
<i>Site 3: Demolition of an Existing MOB</i>	
<ul style="list-style-type: none"> • 79,335-sf MOB • 103 feet in height (7 stories) above grade 	<ul style="list-style-type: none"> • New construction at this site to occur during Phase 3
<i>Site 4: Demolition of an Existing MOB</i>	
<ul style="list-style-type: none"> • 120,556-sf MOB • 8 stories, above grade 	<ul style="list-style-type: none"> • New construction at this site to occur during Phase 2
Phase 2 (2024–2028)	
<i>Site 5: New Parking Structure</i>	
<ul style="list-style-type: none"> • 19,199-sf parking structure with 186 stalls • 4 stories (2 above grade, 2 below grade) 	<ul style="list-style-type: none"> • 246,566-sf parking structure with 636 stalls • 2,300 sf of ground floor retail/commercial space • 90 feet in height (10 stories, with 8 above grade, 2 below grade)
<i>Site 4: Reconstructed MOB or Hospital Addition</i>	
<ul style="list-style-type: none"> • Demolition at this site to occur during Phase 1 	<ul style="list-style-type: none"> • 132,700-sf MOB • 89 feet in height (6 stories, with 5 above grade, 1 below grade) <p>OR</p> <ul style="list-style-type: none"> • 161,600-sf, 105-bed hospital addition and bridge connections to existing hospital • 105 feet in height (6 stories, with 5 above grade, 1 below grade)
Phase 3 (2028–2030)	
<i>Site 6: Parking Structure Addition</i>	
<ul style="list-style-type: none"> • existing surface parking area and temporary, single-story structure at 1430 & 1424 North Alexandria 	<ul style="list-style-type: none"> • 200-stall parking structure addition at 1430 & 1424 North Alexandria (122,579 sf) • 90 feet in height (8 stories above grade)
<i>Site 3: New Medical Offices</i>	
<ul style="list-style-type: none"> • Demolition at this site to occur during Phase 1 	<ul style="list-style-type: none"> • 85,000-sf medical offices • 85 feet in height (5 stories above grade)
Totals	
<i>Building and Parking Structure Square Footage</i>	
Total demolition	234,607 sf
Total new construction	1,082,415 sf
Net increase	847,808 sf
<i>Parking</i>	
Total removed	225 spaces (Phase 1 & 2), 9 spaces (Phase 3)
Total new	1,234 spaces (Phase 1 & 2), 200 spaces (Phase 3)
Net increase	1,200 spaces

2. Sustainability Features

The Project would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green

Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The Project would be designed to meet the requirements for the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver or equivalent.

a. CEQA Guidelines Appendix F

In accordance with California Environmental Quality Act (CEQA) Guidelines Appendix F, the environmental impact report (EIR) will provide further information as to energy conservation, energy implications, and the energy-consuming equipment and processes that would be used during Project construction and operation. Design features of the Project, energy supplies that would serve the Project, and total estimated daily vehicle trips that would be generated by the Project will also be analyzed. Further analysis of the Project's consistency with Appendix F will be provided in the EIR.

C. Project Construction and Scheduling

The Project would be implemented in three phases. The first phase would begin in 2020 and would be completed by 2024. The second phase would begin in 2024 and would be completed by 2028. The third phase would begin in 2028 and would be completed by 2030.

D. Requested Permits and Approvals

- The list below includes the anticipated requests for approval of the Project. The EIR will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following: Pursuant to Los Angeles Charter Section 555 and Los Angeles Municipal Code (LAMC) Section 11.5.7-G, Specific Plan Amendment for a project located within the Vermont/Western Transit Oriented District Specific Plan/SNAP area to:
 1. Amend Section 4 of the SNAP to revise the Definition of a Unified Hospital Development Site.
 2. Permit signs that the SNAP specifically identifies as prohibited signs
 3. Permit a boundary change to the SNAP, to include the properties at 1430 & 1424 North Alexandria Avenue and 1423 North Kenmore Avenue within Subarea C of the SNAP boundaries.

4. Permit a boundary change to the SNAP, to include the properties at 1549 North Edgemont Street and 1559 North Edgemont Street within Subarea C in lieu of Subarea B;
 - Pursuant to LAMC Section 11.5.7-C, Project Permit Compliance Review for a project located within the SNAP area;
 - Pursuant to LAMC Section 16.05, Site Plan Review to permit a development project which creates, or results in an increase of, 50,000 gross sf or more of nonresidential floor area;
 - Pursuant to LAMC Section 17.15, Vesting Tentative Tract Map No. 74846 to permit the merger and resubdivision of existing parcels into six ground lots;
 - Pursuant to LAMC Section 17.15, Vesting Tentative Tract Map No. 74847 to permit the merger of existing parcels into one ground lot;
 - Pursuant to LAMC Section 17.15, Vesting Tentative Tract Map No. 74848 to permit the merger of existing parcels into one ground lot;
 - Development Agreement, pursuant to Government Code Sections 65864-65869.5.
 - Associated building permits, including demolition permits, grading permits, excavation permits, and foundation permits; and
 - Haul route approval and other entitlements and approvals as deemed necessary, and as required by the City of Los Angeles (City) to implement the Project.

Initial Study

Attachment B: Explanation of Checklist Determinations

I. Aesthetics

Pursuant to SB 743 (PRC §21099(d)), “[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” The City of Los Angeles Department of City Planning issued Zoning Information File ZI No. 2451, which provides further instruction concerning the definition of transit priority projects and affirms that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill projects within transit priority areas pursuant to CEQA.¹ Since the Project qualifies as an employment center project on an infill site within a transit priority area, its potential aesthetic effects shall not be considered significant impacts on the environment. However, the EIR will include a discussion of aesthetics for informational purposes only.

Would the project:

a. Have a substantial adverse effect on a scenic vista?

No Impact. There are no natural features of substantial scenic value (such as trees, topography, rock outcroppings, bodies of water, or native vegetation) on the Project site that could be considered scenic. Existing views from and through the project site are generally limited and obstructed by existing buildings and topography. The Project would result in an increase in the height of several structures on the Project site and an increase in the massing of structures. The new structures would have the potential to affect views that may currently be available from and through the site. As such, the EIR will discuss scenic vistas that may be present.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The closest officially designated state scenic highway is State Route 2, located approximately 9 miles northeast of the project site (Caltrans 2011). Portions of U.S. Highway 101 within the Hollywood Community Plan Area are designated as a scenic freeway on the Hollywood Community Plan Land Use Map (City of Los

¹ City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2451, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Accessed on August 15, 2017.

Angeles 2014). The nearest portions with this designation are located approximately 1 mile west of the Project site. Los Feliz Boulevard, located approximately 1 mile north of the Project site, is designated as a scenic highway in the Hollywood Community Plan Land Use Map (City of Los Angeles 2014). While there are no scenic trees or rock outcroppings, there are potentially eligible historic buildings on the Project site, which are considered scenic resources. As such, a discussion of the historic buildings will be included in the EIR.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

No Impact. The new buildings on the Project site would contribute to a change in the existing visual character of the site and surroundings, and as such, this issue will be further discussed in the EIR.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

No Impact. The new buildings on the Project site would have the potential to introduce new sources of light and glare, which could affect day or nighttime views to the Project area. As such, this issue will be discussed in the EIR.

References

Caltrans (California Department of Transportation). 2011. California Scenic Highway Mapping System. Last updated September 7, 2011. Accessed July 6, 2017. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

City of Los Angeles. 2014. "Hollywood Community Plan Land Use Map." April 2014. Accessed July 6, 2017. <http://cityplanning.lacity.org/complan/central/hwdpage.htm>.

City of Los Angeles. 2017. Department of City Planning, Zoning Information File ZA No. 2451, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Accessed on August 15, 2017. <https://files.alston.com/files/docs/ZI%202451-TPA-Aesthetics-and-Parking.pdf>.

II. Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

- a. **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

No Impact. The Project site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP 2016). Therefore, the Project would not convert Farmland to non-agricultural uses. Further analysis of this issue is not necessary and no mitigation measures would be required.

- b. **Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

No Impact. The Project site has a General Plan land use designation of Community Commercial and is zoned for commercial uses and parking building uses. Small portions of the Project site are designated and zoned as residential (City of Los Angeles 2017). Agricultural uses are not permitted within these zones, and the Project site is not under a Williamson Act contract (California Department of Conservation 2016). Further analysis of this issue is not necessary and no mitigation measures would be required.

- c. **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

No Impact. As described in item B.II(b), the Project site is zoned for commercial and parking building uses, with small portions zoned for residential use. There are no areas zoned for agricultural or forest land uses within the vicinity of the Project site. Furthermore, the Project site is fully developed and urbanized. Therefore, the Project would not conflict with existing zoning, or cause the rezoning of forest land, timberland, or timberland production land. Further analysis of this issue is not necessary and no mitigation measures would be required.

- d. **Result in the loss of forest land or conversion of forest land to non-forest use?**

No Impact. The Project site is located within a built, urbanized area, as shown in Figure 1, and no forest lands exist within the Project vicinity. Further analysis of this issue is not necessary and no mitigation measures would be required.

- e. **Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

No Impact. No agricultural resources or operations currently exist on or near the Project site, which is located in a highly urbanized area. Therefore, the Project would not involve

changes in the existing environment that would result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Further analysis of this issue is not necessary and no mitigation measures would be required.

References

- California Department of Conservation. 2016. *Los Angeles County Williamson Act FY 2015/2016*. [map]. 1:120,000. Sacramento, CA: California Department of Conservation, Division of Land Resource Protection. 2016. Accessed July 5, 2017. <http://www.consrv.ca.gov/dlrp/lca/Pages/Index.aspx>.
- City of Los Angeles. 2017. "Zoning Information and Map Access System (ZIMAS)." Accessed July 6, 2017. <http://zimas.lacity.org/>.
- FMMP (Farmland Mapping and Monitoring Program). 2016. *Los Angeles County Important Farmland 2012*. [map]. 1:120,000. Sacramento, CA: Farmland Mapping and Monitoring Program. April 2016. Accessed July 5, 2017. http://www.conservation.ca.gov/dlrp/fmmp/Pages/county_info.aspx.

III. Air Quality

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. A significant impact may occur if the Project is not consistent with the applicable air quality plan or would interfere with implementation of the policies of that plan. The Project site is within the South Coast Air Basin, and the applicable plan is the Air Quality Management Plan prepared by the South Coast Air Quality Management District. Construction and operation of the Project could result in an increase in emissions by increasing the intensity of development at the Project site. These emissions may conflict with the Air Quality Management Plan. As such, further analysis of this issue will be provided in the EIR.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Potentially Significant Impact. A project may have a significant impact where project-related emissions would exceed federal, state, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Air pollutants would be emitted as result of construction and operation of the Project, and emissions would have the potential to violate air quality standards set by the South Coast Air Quality Management District. As such, further analysis of this issue will be provided in the EIR.

- c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Potentially Significant Impact. An area is designated as in attainment when it is in compliance with the National Ambient Air Quality Standards and/or the California Ambient Air Quality Standards. The South Coast Air Basin is designated as a nonattainment area for several pollutants, including ozone and particulate matter. The construction and operation of the Project could result in a cumulatively considerable net increase of pollutants for which the Project area is in non-attainment. As such, this issue will be further analyzed in the EIR.

- d. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. A significant impact may occur if a project would generate pollutant concentrations that would significantly affect sensitive receptors. Sensitive receptors in proximity to the Project site include residences to the south and northwest of the Project site, as well as the hospital uses located within the Medical Center campus and to the east of the Project site. Due to the proximity of sensitive receptors to the Project site and the potential for the Project to produce pollutants, this issue will be further analyzed in the EIR.

- e. Create objectionable odors affecting a substantial number of people?

Potentially Significant Impact. Construction-related odors that would potentially be detected during construction of the Project would include diesel exhaust, petroleum products used in motor vehicles, freshly graded earth, and architectural coatings. The Project would involve construction of parking areas and buildings for medical use. The potential for the Project to create objectionable odors will be further examined in the EIR.

IV. Biological Resources

Would the project:

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. The Project site is located in a highly urbanized area and is developed with parking areas and medical office buildings. There is limited ornamental landscaping on the site. According to the California Natural Diversity Database, several special-status species have historically been sighted in the general area of the Project site. These occurrences were documented in the late 1800s and early 1900s (although the date of one occurrence is unknown) (CDFW 2017). Based on the

disturbed and developed condition of the site and the relative lack of suitable habitat, the potential for any known sensitive species to occur on the site is very low, as the Project site and the Project vicinity are highly urbanized with few natural areas that could support wildlife. Furthermore, the reported occurrences are not recent. For the reasons described above, the Project would not have a substantial, adverse effect on special-status species. No impact would occur. Further analysis of this issue is not necessary and no mitigation measures would be required.

- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?**

No Impact. There are no riparian habitat areas located on or within the vicinity of the Project site (USFWS 2017; City of Los Angeles 2017). Vegetation on the site consists of sparse ornamental plantings that do not constitute a sensitive natural community. As such, no impact to riparian habitats or other sensitive natural communities identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service would occur as a result of the Project. Further analysis of this issue is not necessary and no mitigation measures would be required.

- c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

No Impact. There are no wetlands located on or adjacent to the Project site (USFWS 2017). As such, the Project would have no impact on federally protected wetlands. Further analysis of this issue is not necessary and no mitigation measures would be required.

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Potentially Significant Impact. The Project site is located within a developed, urbanized area. There are no wetlands or running waters within the Project area, and therefore, the Project would have no potential to affect the movement of migratory fish. However, the Project site contains trees that would have the potential to provide nesting areas for migratory or nesting birds. The EIR will further examine impacts to migratory wildlife (namely, nesting birds).

- e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

Potentially Significant Impact. City Ordinances protecting trees may be potentially applicable to the Project. The EIR will describe the on-site trees and will list any applicable policies protecting these trees. The potential for the Project to conflict with

local policies or ordinances established for the protection of biological resources will be further examined in the EIR.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Hollywood Community Plan does not designate any portions of the Community Plan Area as being within a habitat conservation plan (City of Los Angeles 1988). Furthermore, the Project area is not within any of the regional conservation plans designated by the state (CDFW 2017). Therefore, implementation of the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Further analysis of this issue is not necessary and no mitigation measures would be required.

References

CDFW (California Department of Fish and Wildlife). 2017. *California Regional Conservation Plans* [map]. July 2017. Accessed July 7, 2017.
<https://www.wildlife.ca.gov/Conservation/Planning/NCCP>.

CDFW (California Department of Fish and Wildlife). 2017. "List of California Natural Diversity Database (CNDDDB) Species for Hollywood and Los Angeles Quads (Quarter-Mile Buffer around Project Site)." Quick Viewer. Accessed January 21, 2016. Reviewed July 21, 2017. <https://www.wildlife.ca.gov/Data/CNDDDB>.

City of Los Angeles. 1988. *Hollywood Community Plan*. December 13, 1988. July 7, 2017. <http://cityplanning.lacity.org/complan/central/hwdpage.htm>.

City of Los Angeles. 2017. "Navigate LA, Hydrographic Information layer." Accessed July 7, 2017. <http://navigatela.lacity.org/NavigateLA/>.

USFWS (United States Fish and Wildlife Service). 2017. National Wetlands Inventory, *Wetlands Mapper*, Search by Address. Accessed July 7, 2017.
<http://www.fws.gov/wetlands/Data/Mapper.html>.

V. Cultural Resources

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Potentially Significant Impact. The Project would involve demolition of several structures on the Project site, some of which may be of historic age (i.e., 45 years or older). The EIR will identify if any buildings on the Project site are of historic age, and

if any are, will evaluate these buildings to determine whether a significant impact to a historical resource would occur.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Potentially Significant Impact. The Project site is located in a highly urbanized area that has been subject to grading and development in the past. Therefore, it is not anticipated that the site contains any surface-level archaeological resources. However, ground-disturbing activities associated with construction of the Project, such as excavation of below-grade levels of the proposed parking structures and medical office buildings, would have the potential to damage or destroy intact subsurface archaeological deposits that may be present below the ground surface. The EIR will therefore discuss the potential for such resources to be impacted by the Project.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. The Project site is located in a highly urbanized area that has been subject to grading and development in the past. Therefore, it is not anticipated that the site contains any surface-level paleontological resources or unique geologic features. However, ground-disturbing activities associated with construction of the Project, such as excavation of below-grade levels, would have the potential to damage or destroy intact subsurface paleontological deposits or geologic features that may be present below the ground surface. The EIR will therefore discuss the potential for such resources to be impacted by the Project.

d. Disturb any human remains, including those interred outside of dedicated cemeteries?

Potentially Significant Impact. The Project site is located in a highly urbanized area that has been subject to grading and development in the past. Therefore, it is not anticipated that the site contains any surface-level human remains. However, ground-disturbing activities associated with construction of the Project, such as excavation of below-grade levels, would have the potential to damage or destroy intact subsurface human remains that may be present below the ground surface. The EIR will therefore discuss the potential for such resources to be impacted by the Project.

VI. Geology and Soils

In 2015, the California Supreme Court in California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD), held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions

that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the project would have a significant impact related to geology and soils if it would result in any of the following impacts.

Would the project:

- a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.**

Potentially Significant Impact. The Project site is not located within an Alquist-Priolo Earthquake Fault Zone, nor is it located on a known fault line (City of Los Angeles 2017). However, the Hollywood Fault is an active fault that runs through portions of the City, approximately 0.5 mile north of the Project site (City of Los Angeles 2017; CGS 2014). In addition to the Hollywood Fault, there are numerous other active fault systems within the greater Los Angeles region. The Project's potential exacerbation of existing environmental conditions which could expose people or structures to potential substantial adverse effects involving rupture of a known earthquake fault will be further analyzed in the EIR.

- ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?**

Potentially Significant Impact. As with many areas of Southern California, the Project site is located within a seismically active area. The Hollywood Fault is an active fault that runs through portions of the City. The fault is located approximately 0.5 mile north of the Project site (City of Los Angeles 2017; CGS 2014). Other active fault systems within the greater Los Angeles region include the Newport-Inglewood Fault Zone, the Sierra Madre Fault Zone, and the San Jacinto Fault Zone. The Project's potential exacerbation of existing environmental conditions which could expose people or structures to potential substantial adverse effects involving strong seismic ground shaking will be further analyzed in the EIR.

- iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?**

Potentially Significant Impact. The Project site is not shown as being within an area subject to liquefaction as identified by the State (CGS 2014). However, the Project area is within and near liquefiable areas and potentially liquefiable areas as designated by the City in the General Plan Safety Element (City of Los Angeles

1993). Because site-specific soil characteristics and the engineering design of the proposed development are not known at this time, the Project's potential exacerbation of existing environmental conditions which could expose people or structures to potential substantial adverse effects involving seismic-related ground failure will be further analyzed in the EIR.

iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Potentially Significant Impact. The Project site is not located within an area identified as being susceptible to landslides by the state or the City (CGS 2014; City of Los Angeles 1993, 2017). However, Barnsdall Park is located on Olive Hill behind the Medical Center campus. As such, there is a sloped area adjacent to the Medical Center campus. The Project's potential exacerbation of existing environmental conditions which could expose people or structures to potential substantial adverse effects involving landslides will be further analyzed in the EIR.

b. Result in substantial soil erosion or the loss of topsoil?

Potentially Significant Impact. The relatively flat and highly developed nature of the Project site precludes it from being readily susceptible to erosion. However, construction of the Project would result in ground surface disruption during grading and excavation that could create the potential for erosion to occur. As such, this issue will be examined in the EIR.

c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Potentially Significant Impact. As discussed under item B.VI(a(iii)) above, the Project site is located on soils that are potentially susceptible to liquefaction as mapped by the City. Other potential soil instabilities could include compressible clay or peat soils and soils that could fail during foundation excavations (which would include sub-grade excavations associated with several of the proposed structures). Therefore, the potential exists for the Project to exacerbate existing environmental conditions, which could result in liquefaction. This issue will be examined in the EIR.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Potentially Significant Impact. Site-specific soil characteristics and the engineering design of the proposed development are not known at this time. Adverse effects associated with the Project's potential to exacerbate any existing conditions pertaining to expansive soils will require further analysis in the EIR.

- e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The Project would use the regional sewer system for disposal of wastewater, and therefore, it would not require septic tanks or other alternative wastewater disposal systems. As such, no impact would occur. Further analysis of this issue is not necessary and no mitigation measures would be required.

References

CGS (California Geological Survey). 2014. *Earthquake Zones of Required Investigation – Hollywood Quadrangle*. [map.] 1:24,000. Earthquake Fault Zones released November 6, 2014; Seismic Hazard Zones released March 25, 1999. Accessed July 7, 2017. <http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>.

City of Los Angeles. 1993. *Safety Element Exhibit B – Areas Subject to Liquefaction in the City of Los Angeles and Safety Element Exhibit C – Landslide Inventory & Hillside Areas*. October 1993 and June 1994. Accessed July 7, 2017.
<http://cityplanning.lacity.org/index.htm>.

City of Los Angeles. 2017. “Navigate LA, Geotechnical Information layer.” Accessed July 7, 2017. <http://navigatela.lacity.org/NavigateLA/>.

VII. Greenhouse Gas Emissions

Would the project:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. Greenhouse gas (GHG) emissions would be generated as a result of construction and operation of the Project. Construction activities would result in GHG emissions from heavy construction equipment, truck traffic, and worker trips to and from the Project site. Operation of the Project would potentially generate additional GHG emissions relative to existing conditions, due to the proposed increase in the land use intensity at the Project site. The EIR will identify the sources of construction and operational GHG emissions and will determine whether the Project would result in a significant increase in GHGs.

- b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. As described under item B.VII(a), the Project would generate GHG emissions. Therefore, the Project would have the potential to conflict with plans, policies, or regulations adopted for the purpose of reducing the emissions

of greenhouse gases. The EIR will identify applicable plans and will evaluate the Project's consistency with those plans.

VIII. Hazards and Hazardous Materials

As discussed above, in 2015, the California Supreme Court in CBIA v. BAAQMD, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. For example, if construction of the project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the project's residents. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the project would have a significant impact related to hazards and hazardous materials if it would result in any of the following impacts.

Would the project:

- a. **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Potentially Significant Impact. The construction activities associated with the Project are anticipated to use typical although potentially hazardous construction materials such as vehicle fuels, paints, mastics, solvents, and other acidic and alkaline solutions that would require special handling, transport, and disposal. Construction would also involve demolition of existing medical office buildings, which could include disposal of hazardous materials typically used for medical purposes, including biohazardous materials, chemicals used to sterilize equipment, radioactive materials, and stains used in clinical laboratories. During operation, the new and expanded hospital and medical office buildings would store and use maintenance materials and medical materials, such as cleaning solvents and the medical materials listed previously. Therefore, the potential exists for the Project to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. As such, the EIR will include further analysis of this issue.

- b. **Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

Potentially Significant Impact. Please refer to the discussion under item B.VIII(a). As described under item B.VIII(a), the potential exists for the Project to involve the release of hazardous materials. This issue will, therefore, be examined in the EIR.

- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Potentially Significant Impact. The Project site is located within one-quarter mile of several existing schools (including Los Feliz Elementary School at 1740 North New Hampshire Avenue; Mary's Schoolhouse at 1334 L. Ron Hubbard Way; Rose and Alex Pilibos Armenian School at 1615 Alexandria Avenue; and the Pacific Southwest Lutheran Learning Center at 1518 North Alexandria Avenue) (California Department of Education 2014). As described above under items B.VIII(a) and B.VIII(b), the Project would involve transport, storage, and use of potentially hazardous materials. As such, this issue will be further examined in the EIR.

- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?

Potentially Significant Impact. The Project site is within the Medical Center campus. The properties within the Project site are currently being used by Kaiser Permanente for parking and medical office buildings, with the exception of Site 1, which is occupied with commercial, residential, and surface parking uses. The EIR will include the results of a database search of hazardous materials sites that will identify any listed hazardous materials site that occurs on, or within the vicinity of, the Project site. The EIR will then evaluate whether or not the Project would exacerbate any existing environmental conditions associated with these sites (if any are present) such that a significant hazard to the public or to the environment would result.

- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The nearest public airport is the Hollywood Burbank Airport, located approximately 8 miles northwest of the Project site (Caltrans 2017). The Project site is not located within an airport land use plan, nor is it located within 2 miles of a public airport or public use airport. Therefore, the Project would not create an airplane safety hazard for people residing or working in the project area, and no impacts would occur. Further analysis of this issue is not necessary and no mitigation measures would be required.

- f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. There are no private airstrips within the vicinity of the Project site. Therefore, the Project would not create an airplane safety hazard for people residing

or working in the project area, and no impacts would occur. Further analysis of this issue is not necessary and no mitigation measures would be required.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Potentially Significant Impact. The construction and operation activities associated with the Project would have the potential to interfere with emergency response and evacuation plans. The EIR will analyze applicable emergency response and evacuation plans and will evaluate whether Project activities would impair implementation of these plans.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including, where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands, caused in whole or in part from the project's exacerbation of existing environmental conditions?

Less Than Significant Impact. The Project site is not within a Very High Fire Hazard Severity Zone (City of Los Angeles 2017). General Plan Safety Element Exhibit D shows areas of potential wildland fire hazards, consisting of Mountain Fire Districts, Fire Buffer Zones, and Electrical Transmission Lines described below. A Fire Buffer Zone begins on the north side of Hollywood Boulevard, which is approximately 0.2 mile from the Project site. North of Franklin Avenue is a Mountain Fire District, beginning approximately 0.4 mile from the Project site. However, the Project site is located south of these designations, and, as indicated in item B.IV, there are no wildlands on the Project site (City of Los Angeles 1993). Impacts would be less than significant. Further analysis of this issue is not necessary and no mitigation measures would be required.

References

California Department of Education. 2014. Earth Layer – California Schools. 2014. Accessed July 7, 2017. <http://services.gis.ca.gov/arcgis/rest/services/Society/CaliforniaSchools/MapServer>.

Caltrans (California Department of Transportation). 2017. California Aviation Facilities. Web Map Application. 2017. Accessed July 7, 2017. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=966ebca3d4044e84bb352b98c5a62a35>.

City of Los Angeles. 1993. *Safety Element Exhibit D – Selected Wildfire Hazard Areas in the City of Los Angeles*. October 1993. Accessed July 7, 2017. <http://cityplanning.lacity.org/index.htm>.

City of Los Angeles. 2017. “Navigate LA, Special Areas layer.” Accessed July 7, 2017. <http://navigatela.lacity.org/NavigateLA/>.

IX. Hydrology and Water Quality

Would the project:

a. Violate any water quality standards or waste discharge requirements?

Potentially Significant Impact. The Project would involve the development of medical office uses, hospital uses, and parking structure uses on land that is currently developed with similar uses. However, this proposed redevelopment would have the potential to alter the existing surface water runoff drainage pattern of the properties, having the potential to cause a net increase of stormwater discharge and/or polluted discharges, which could violate water quality standards or waste discharge requirements. As such, this issue will be further evaluated in the EIR.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Potentially Significant Impact. Existing percolation of rainwater and irrigation water into the water table could potentially be diminished as a result of the proposed redevelopment, which could affect groundwater recharge. In addition, groundwater could potentially be encountered during the proposed demolition and excavation activities required during construction. Further analysis of this issue will be provided in the EIR.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Potentially Significant Impact. The Project site is currently developed with medical office buildings and parking. No streams or rivers are located on, or within the vicinity of, the Project site. The Project would involve demolition and reconstruction or replacement of existing site uses, which could potentially alter drainage patterns on the Project site and in the Project area. As such, this issue will be examined in the EIR.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Potentially Significant Impact. The Project site is currently developed with medical office buildings, commercial and residential uses, and parking. No streams or rivers are located on, or within the vicinity of, the Project site. The Project would involve demolition of the existing site uses and redevelopment of the properties within the Project site with medical uses and parking buildings, which could potentially alter

drainage patterns on the Project site and in the Project area. As such, this issue will be examined in the EIR.

- e. **Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

Potentially Significant Impact. Construction of the Project would involve temporary exposure of on-site soils and the introduction of potential stormwater pollutants such as fuel for construction equipment on the Project site. If a storm event were to occur during construction, runoff of soils and chemicals could potentially cause stormwater pollution. Additionally, the amount of runoff from the Project site could potentially increase during construction due to the temporary clearing of the site. After Project implementation, the Project would result in new or altered structures and new or altered landscaping and hardscape on the site, which could create or contribute runoff water that could exceed the capacity of stormwater drainage or result in pollution. As such, impacts involving stormwater drainage systems and polluted runoff will be examined in the EIR.

- f. **Otherwise substantially degrade water quality?**

Potentially Significant Impact. See the discussion under items B.IX(a) through B.IX(e). This issue will be further examined in the EIR.

- g. **Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

No Impact. The Project would not involve construction of housing. Furthermore, the Project site is not located within a 100-year flood hazard area (City of Los Angeles 1996). Further analysis of this issue is not necessary and no mitigation measures would be required.

- h. **Place within a 100-year flood hazard area structures which would impede or redirect flood flows?**

No Impact. The Project site is not located within a 100-year flood hazard area (City of Los Angeles 1996). As such, the Project would not place structures within a 100-year flood hazard area. Further analysis of this issue is not necessary and no mitigation measures would be required.

- i. **Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**

Less Than Significant Impact. As discussed above under items B.IX(g) and B.IX(h), the Project site is not located within a 100-year flood zone or plain. The Project site is located approximately three miles southeast of the Hollywood Reservoir. The General Plan Safety Element includes a map of the potential inundation areas of the reservoirs

and waterbodies in the City. The Project site is located approximately 0.6 mile east of the mapped Hollywood Reservoir inundation area and one mile west of another inundation area (City of Los Angeles 1993). The likelihood of a breach is low, and the Project site is not located within the mapped path of any inundation areas. Furthermore, there are numerous regulations and measures in place that reduce the likelihood of dam failure in the City. For example, dams must be maintained in accordance with dam safety regulations, and the California Division of Safety of Dams provides periodic review of dams in the state. Dams and reservoirs are also monitored by the City during storms. As such, the Project is not expected to be subject to hazards associated with flooding, including flooding as a result of levee or dam failure. Impacts are less than significant. Further analysis of this issue is not necessary and no mitigation measures would be required.

j. Inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a large sea wave produced by a significant disturbance undersea. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity. As discussed under item B.IX(i), the Project site is located outside of potential inundation areas as mapped by the City and is three miles from the Hollywood Reservoir. The Los Angeles Department of Water and Power reduces the potential for seiches to occur through regulation of the level of water in their storage facilities and the provision of walls of extra height to contain seiches. Given these safety measures and the distance between the Project site and the nearest inland waterbody, potential impacts related to a seiche would be less than significant.

The Project site is located 13 miles northeast of the Pacific Ocean and is not located within an area mapped by the City as having the potential to be impacted by a tsunami (City of Los Angeles 1993). As such, no impacts related to tsunami hazards would occur on the Project site. Regarding the potential for mudflow, the Project site has relatively flat topography and is not located within a landslide hazard area as mapped by the state or the City, nor is it within a hillside area as mapped by the City (CGS 2014; City of Los Angeles 1993, 2017). The Hollywood Hills are located approximately one mile north of the Project site. These hills are mapped on the Landslide Inventory and Hillside Areas map in the General Plan Safety Element. However, the distance between the Hollywood Hills and the Project site (approximately one mile) and the intervening structures reduces the likelihood for any potential mudflows to reach the Project site. For these reasons, impacts associated with hazards due to mudflow are less than significant. Further analysis of hazards related to seiche, tsunami, and mudflow is not necessary and no mitigation measures would be required.

References

- City of Los Angeles. 1993. *Safety Element Exhibit G – Inundation & Tsunami Hazard Areas in the City of Los Angeles and Safety Element Exhibit C – Landslide Inventory & Hillside Areas*. October 1993. Accessed July 7, 2017. <http://cityplanning.lacity.org/index.htm>.
- City of Los Angeles. 1996. Figure FC-2 in *Los Angeles Citywide General Plan Framework EIR*. Prepared by Envicom Corporation. June 1996. Accessed July 10, 2017. <http://cityplanning.lacity.org/housinginitiatives/housingelement/frameworkeir/FrameworkFEIR.pdf>.
- City of Los Angeles. 2017. “Navigate LA, Geotechnical Information layer.” Accessed July 7, 2017. <http://navigatela.lacity.org/NavigateLA/>.
- CGS (California Geological Survey). 2014. *Earthquake Zones of Required Investigation – Hollywood Quadrangle*. [map.] 1:24,000. Earthquake Fault Zones released November 6, 2014; Seismic Hazard Zones released March 25, 1999. Accessed July 7, 2017. <http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>.

X. Land Use and Planning

Would the project:

a. Physically divide an established community?

No Impact. The Project would involve redevelopment of parking uses and medical office buildings on the Project site with new parking and medical uses having different configurations and sizes relative to existing conditions. The types of uses being proposed are consistent with those that currently exist on the Project site. One property on the project site (1345 North Vermont Avenue) is currently developed with commercial uses, surface parking, and residential uses. The Project would involve replacement of these uses with a medical office building and a parking structure, which would change the land use of the site. However, this change in land use would not divide an established community, because this site is generally surrounded by a mixture of medical uses, commercial uses, and residences. The site is located approximately 200 feet south of existing Kaiser buildings and is across the street from the Hollywood Presbyterian Medical Center and Children’s Hospital Los Angeles. Development of this site with medical uses and parking uses would be consistent with surrounding uses to the north and east and would not obstruct access to or access through existing communities. Furthermore, the Project would not involve features such as a highway, aboveground infrastructure, or an easement through an established neighborhood having the potential to divide an established community. For these reasons, the Project would not physically divide an established community,

and no impact would occur. Further analysis of this issue is not necessary and no mitigation measures would be required.

- b. **Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?**

Potentially Significant Impact. The Project could conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The EIR will provide additional analysis to assess potential impacts.

- c. **Conflict with any applicable habitat conservation plan or natural community conservation plan?**

No Impact. The Hollywood Community Plan does not designate any portions of the Community Plan Area as being located within a habitat conservation plan (City of Los Angeles 1988). Furthermore, the Project area is not located within any of the regional conservation plans designated by the state (CDFW 2017). Therefore, implementation of the Project would not conflict with habitat conservation plans or natural community conservation plans. Further analysis of this issue is not necessary and no mitigation measures would be required.

References

CDFW (California Department of Fish and Wildlife). 2017. *California Regional Conservation Plans* [map]. July 2017. Accessed July 2017.
<https://www.wildlife.ca.gov/Conservation/Planning/NCCP>.

City of Los Angeles. 1988. *Hollywood Community Plan*. December 13, 1988. Accessed July 7, 2017. <http://cityplanning.lacity.org/complan/central/hwdpage.htm>.

XI. Mineral Resources

Would the project:

- a. **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

No Impact. The Division of Mines and Geology (renamed the California Geological Survey in 2006) has mapped the Project site within Mineral Resource Zone 3 for aggregate resources. Mineral Resource Zone 3 is a designation given to areas containing mineral deposits, the significance of which cannot be evaluated from available data (Division of Mines and Geology 1994). The Project site is located in a fully developed and urbanized area and does not support any mineral extraction activities. Due to the developed, urbanized nature of the Project site and its surroundings, as well as the absence of known mineral resources as mapped by the

state, project implementation is not anticipated to result in loss of availability of a known mineral resource of value to the region and residents of the state. No impacts to state or regionally important mineral resources would occur. Further analysis of mineral resources is not necessary and no mitigation measures would be required.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The Project area is not delineated as a locally important mineral resource recovery site in the General Plan (City of Los Angeles 1996). The Project is located in a fully urbanized area and does not support any mineral extraction activities. Due to the developed, urbanized nature of the Project site and its surroundings, as well as the absence of significant mineral resources as mapped in the General Plan, project implementation is not anticipated to result in loss of availability of a known mineral resource of value to the region and residents of the state. No impacts to locally important mineral resources would occur. Further analysis of mineral resources is not necessary and no mitigation measures would be required.

References

Division of Mines and Geology. 1994. *Generalized Mineral Land Classification Map of Los Angeles County – South Half – Aggregate Resources Only*. [map]. 1:100,000. USGS 7.5 Minute Topographic Quadrangles. Prepared by Russell V. Miller. 1994. Accessed July 7, 2017. <http://www.quake.ca.gov/gmaps/WH/smaramaps.htm>.

City of Los Angeles. 1996. Figure GS-1 in *Los Angeles Citywide General Plan Framework EIR*. Prepared by Envicom Corporation. June 1996. Accessed July 7, 2017. <http://cityplanning.lacity.org/housinginitiatives/housingelement/frameworkeir/FrameworkFEIR.pdf>.

XII. Noise

Would the project result in:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. Construction activities associated with the Project would intermittently generate increased noise levels on the Project site and in areas adjacent to the site. Operation of the Project would represent an increase in intensity of uses on the site and a change in the distribution and/or orientation of these uses within the site. The increase in intensity of uses at the Project site could potentially be associated with an increase in both vehicle traffic and pedestrian activity in the vicinity. Therefore, both construction and operation of the Project would have the potential to generate noise levels in excess of standards established in the City's general plan and/or noise ordinance. The EIR process will include a field noise study

that will measure existing on- and off-site noise conditions. The analysis provided in the EIR will compare the existing noise levels as measured in the field and the established noise standards to the noise levels anticipated to result from construction and operation of the Project. The EIR will use this information to determine whether the Project would result in exceedances of standards established in the City's general plan and/or noise ordinance.

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction activities associated with the Project would intermittently generate increased vibration on the Project site and in areas adjacent to the site. Construction vibration would have the potential to disturb nearby sensitive receptors. Vibration-sensitive receptors typically include residential areas, schools, libraries, churches, nursing homes, hospitals, and open space/recreation areas. Residential neighborhoods are located north, south, and west of the Project site, and an open space area (Barnsdall Park) is located adjacent to, and north of, the Medical Center campus. The Church of Scientology is located across the street from 4867 Sunset Boulevard and 4760 Sunset Boulevard. The Medical Center campus contains hospital uses that may be sensitive to vibration, and is adjacent to two other medical uses (Children's Hospital Los Angeles and Hollywood Presbyterian Medical Center), which are located east of the Project site. The EIR will address levels of vibration anticipated to be intermittently generated during construction and will determine whether the anticipated vibration levels would result in a significant impact. Therefore, this issue will also be discussed in the EIR.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact. As discussed under item B.XII(a), operation of the Project would involve an increase in the intensity of uses on the Project site, which could result in additional traffic and pedestrian activity on the Project site and within the Project area. The increased intensity of uses on the Project site would therefore have the potential to increase the ambient noise levels in the Project vicinity above levels existing without the Project. This increase in ambient noise levels would have the potential to disturb nearby sensitive receptors. Noise-sensitive receptors typically include residential areas, schools, libraries, churches, nursing homes, hospitals, and open space/recreation areas where quiet environments are important for enjoyment, public health, and safety. Residential neighborhoods are located north, south, and west of the Project site, and an open space area (Barnsdall Park) is located adjacent to, and north of, the Medical Center campus. The Church of Scientology is located across the street from 4867 Sunset Boulevard and 4760 Sunset Boulevard. The Medical Center campus contains hospital uses that may be sensitive to vibration and is adjacent to two other medical uses (Children's Hospital Los Angeles and Hollywood Presbyterian Medical Center), which are located east of the project site. As described under item B.XII(a), the EIR process will evaluate the anticipated change in ambient

noise levels resulting from Project operation. The EIR will then evaluate whether this anticipated change would result in a substantial permanent increase in ambient noise levels above levels existing without the Project.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact. As discussed under item B.XII(a), construction and operation of the Project would produce additional noise at the Project site and would, therefore, have the potential to result in a substantial temporary and/or periodic increase in ambient noise levels in the Project vicinity, above levels existing without the Project. As described under item B.XII(c), there are several noise-sensitive receptors within the vicinity of the Project that would have the potential to be affected during construction processes. The analysis in the EIR will compare existing noise levels to the noise levels anticipated to result from construction of the Project and to the noise levels associated with any temporary or periodic noise-generating activities occurring during operation. The EIR will use this information to determine whether the Project would result in a substantial temporary increase in ambient noise levels in the project vicinity.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The nearest public airport is the Hollywood Burbank Airport, located approximately 8 miles northwest of the Project site (Caltrans 2017). The Project site is not located within an airport land use plan, nor is it located within 2 miles of a public airport or public use airport. Therefore, the Project would not expose people residing or working in the Project area to excessive noise related to public airports. No impacts would occur. Further analysis of this issue is not necessary and no mitigation measures would be required.

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. There are no private airstrips within the vicinity of the Project site. Therefore, the Project would not expose people residing or working in the Project area to excessive noise related to private airports. No impacts would occur. Further analysis of this issue is not necessary and no mitigation measures would be required.

References

Caltrans (California Department of Transportation). 2017. California Aviation Facilities. Web Map Application. 2017. Accessed July 7, 2017. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=966ebca3d4044e84bb352b98c5a62a35>.

XIII. Population and Housing

Would the project:

- a. **Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Potentially Significant Impact. The Project would not involve new homes, nor would it involve the extension of roads or other infrastructure with the potential to lead to direct or indirect growth in the City. However, the Project would involve an increase in the intensity of uses on the Project site. This may result in an increase in the number of jobs available on the site, which could induce substantial population growth. As such, the EIR will include more detailed analysis of population growth due to employment on the Project site.

- b. **Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**

No Impact. The Project would primarily involve redevelopment of existing parking uses and medical office buildings on the Project site with new, expanded parking and medical uses. Site 1 contains one duplex, at 1328 North New Hampshire Avenue. This structure would be demolished under the Project. However, the quantity of existing housing that would be displaced (one duplex) would not be substantial. As such, the Project would not necessitate the construction of replacement housing elsewhere. No impact would occur, and further analysis of this issue is not necessary.

- c. **Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

Potentially Significant Impact. As described in item B.XIII(b), the Project would involve removal of an existing residential use at Site 1, which would result in the displacement of people. Therefore, this issue will be further discussed in the EIR.

XIV. Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- a. **Fire protection?**

Potentially Significant Impact. Fire protection services for the Medical Center campus are provided by the Los Angeles Fire Department. The Project would increase the intensity of uses on the Project site, which could increase the demand for

fire protection services, potentially resulting in a need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts. Additionally, portions of the Project site are located within Fire District No. 1. This indicates that the Project site is located within, and near, an area identified by the City as being required to meet additional developmental regulations to mitigate fire hazard-related risks. Therefore, this issue will be evaluated in the EIR.

b. Police protection?

Potentially Significant Impact. Police protection for the Project site is provided by the City of Los Angeles Police Department. The Project would increase the intensity of uses on the Project site, which could result in increased demand for police protection services, potentially resulting in a need for new or physically altered police facilities, the construction of which could cause significant environmental impacts. This issue will be evaluated in the EIR.

c. Schools?

Potentially Significant Impact. The residential areas within the vicinity of the Project site are served by the Los Angeles Unified School District. An increase in the demand for school services is generally associated with an increase in the residential population of a school's service area. The Project would not directly impact local schools by providing new housing. However, the Project may result in the provision of additional jobs on the Project site. As described under item B.XIII(a), an increase in employment has the potential to cause people to relocate to an area, which could result in growth to the extent that new school facilities would be required, the construction of which could cause significant environmental impacts. As such, this issue will be examined in the EIR.

d. Parks?

Potentially Significant Impact. As discussed under item B.XIII(a), an increase in employment on the Project site would have the potential to cause people to relocate to the area, which could increase the use of parks in the area, potentially resulting in a need for new or physically altered park facilities, the construction of which could cause significant environmental impacts. As such, this issue will be examined in the EIR.

e. Other public facilities?

Potentially Significant Impact. As discussed under item B.XIII(a), the potential increase in employment on the Project site would have the potential to cause people to relocate to the area, which could increase the use of other public facilities, such as libraries. Increased use of such facilities could potentially result in the need for new or physically altered facilities, the construction of which could cause significant environmental impacts. As such, this issue will be examined in the EIR.

XV. Recreation

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Potentially Significant Impact. As described under item B.XIII(a), the Project may result in an increase in employment on the Project site. These employees would be able to use nearby parks and recreational facilities located in the vicinity of the Project site. Also, as explained under item B.XIII(a), increased employment has the potential to cause population growth in the community. Employees and any new residents associated with the Project would have the potential to increase the use of existing parks and recreational facilities in the area, which could result in the substantial deterioration of the parks or recreational facilities. Therefore, this issue will be further examined in the EIR.

- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Potentially Significant Impact. Employees and any new residents associated with the Project would have the potential to increase the use of existing parks and recreational facilities in the area, potentially resulting in the need for construction or expansion of recreational facilities, the construction of which could cause adverse physical effects on the environment. Therefore, this issue will be further examined in the EIR.

XVI. Transportation/Traffic

Would the project:

- a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Potentially Significant Impact. The Project would involve redevelopment of existing parking uses, medical office buildings, commercial uses, and residential uses on the Project site with new, expanded parking uses, commercial uses, and medical uses. Construction processes associated with Project implementation would have the potential to affect the transportation system through the hauling of excavated materials and debris, transport of construction equipment, delivery of construction materials, and construction worker commute trips. During operation, the increase in intensity of uses on the Project site would have the potential to increase daily and peak-hour traffic within the Project vicinity as well as use of transit, bicycle, and

pedestrian facilities. The resulting increase in use of the area's transportation facilities could conflict with applicable plans, ordinances, or policies that establish measures of effectiveness for the performance of the circulation system. As such, further evaluation of this issue will be provided in the EIR. The EIR process will identify applicable plans, ordinances, and policies related to the transportation system in the vicinity of the Project site. The EIR will then evaluate whether the Project would cause an increase in use of transportation facilities to the extent that it would conflict with the applicable plans, ordinances, and/or policies.

- b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

Potentially Significant Impact. The applicable Congestion Management Program (CMP) for the Project area and the surrounding metropolitan area is the Los Angeles County Metropolitan Transportation Authority's 2010 CMP. This program monitors and sets performance indicators for a transportation network of numerous highway segments, freeways, and key roadway intersections throughout Los Angeles County (called the CMP Highway and Roadway System). The CMP requires analysis of a project's effects on CMP facilities if the project would add 50 or more trips to a CMP intersection or more than 150 trips to a CMP mainline freeway in either direction during the AM or PM weekday peak hours. The Project may generate additional vehicle trips; however, it cannot be confirmed without further analysis whether the additional trips would result in conflicts with CMP standards. As such, this issue will be further evaluated in the EIR. The EIR will determine whether CMP analysis is required, and if so, it will provide the analysis and will determine whether the vehicle trips attributable to the Project would conflict with standards established in the CMP.

- c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

Less Than Significant Impact. The Project site is not located within the vicinity of any public or private airport, nor is it located within the planning boundary of an airport land use plan. The closest airport to the site is the Hollywood Burbank Airport, located approximately 8 miles northwest of the Project site (Caltrans 2017). While the Project would increase the heights of buildings on the site relative to existing uses, heights would not be increased to the extent that the new buildings would interfere with air traffic. The maximum heights that are being proposed are nine above-grade levels. While the Project would potentially involve an increase in employment on the Project site, any air travel associated with this increase would be negligible relative to the air travel to and from the highly urbanized Los Angeles area. As such, impacts are less than significant. Further analysis of this issue is not necessary and no mitigation measures would be required.

- d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

Potentially Significant Impact. The Project is not anticipated to involve changes to adjacent roadways. Roadway improvements that occur, if any, would be implemented in accordance with City regulations. However, the Project would involve new and expanded parking structures on the Project site, resulting in new ingress/egress locations. The EIR will further evaluate the potential for the Project to substantially increase hazards due to traffic-related design features.

- e. Result in inadequate emergency access?**

Potentially Significant Impact. Construction of the Project may involve activities that would have the potential to impede emergency access, such as temporary closure of travel lanes and generation of construction traffic affecting the capacity of adjacent roadways. The Project would also alter the ingress/egress and emergency access locations for some or all of the properties that compose the Project site. As such, further analysis of this issue will be provided in the EIR.

- f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?**

Potentially Significant Impact. Construction of the Project would have the potential to result in temporary sidewalk closures and/or other temporary effects to alternative transportation facilities having the potential to conflict with adopted policies, plans, or programs for such facilities. Operationally, the Project would increase the intensity of uses on the Project site and could, therefore, result in increased demand for alternative transportation modes in the vicinity of the site. This issue will be further examined in the EIR.

References

Caltrans (California Department of Transportation). 2017. California Aviation Facilities. Web Map Application. 2017. Accessed July 7, 2017. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=966ebca3d4044e84bb352b98c5a62a35>.

XVII. Tribal Cultural Resources

- a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Potentially Significant Impact. The Project would involve ground-disturbing activities that would have the potential to disturb tribal cultural resources, in the event that any are present on the Project site. The EIR will discuss the potential for such resources to be impacted by the Project, in the event that any are identified on the site.

- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Potentially Significant Impact. The Project would involve ground-disturbing activities that could have the potential to disturb tribal cultural resources, in the event that any are present on the Project site. The EIR will discuss the potential for such resources to be impacted by the Project, in the event that any are identified on the site.

XVIII. Utilities and Service Systems

Would the project:

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Potentially Significant Impact. The Project would increase the intensity of uses on the Project site, potentially resulting in increased wastewater generation, which could exceed wastewater treatment requirements of the Regional Water Quality Control Board. As such, this issue will be evaluated in the EIR.

- b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

Potentially Significant Impact. The Project would increase the intensity of uses on the Project site, potentially resulting in increased wastewater generation and water use which could require the construction of new water or wastewater treatment facilities, the construction of which could cause significant environmental effects. Therefore, this issue will be evaluated in the EIR.

- c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

Potentially Significant Impact. As described under item B.IX(a), the proposed redevelopment of properties within the Project site would have the potential to alter the existing surface water runoff drainage pattern of the properties, having the potential to cause a net increase of stormwater discharge, which could result in the construction of new storm water drainage facilities, the construction of which could cause significant environmental effects. As such, this issue will be evaluated in the EIR.

- d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

Potentially Significant Impact. The Project would increase the intensity of uses on the Project site, potentially resulting in increased water demand which could require new or expanded entitlements. As such, this issue will be evaluated in the EIR.

- e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Potentially Significant Impact. The Project would increase the intensity of uses on the Project site, potentially resulting in increased wastewater generation, which could exceed the capacity of the wastewater treatment provider. As such, this issue will be evaluated in the EIR.

- f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

Potentially Significant Impact. Construction of the Project would result in the generation of solid waste such as scrap lumber, concrete, residual wastes, packing materials, and plastics. Operation of the Project could potentially increase the volume of the solid waste stream from the Medical Center campus, because the Project would involve intensification of some of the uses on the site relative to existing conditions. The EIR will, therefore, study the Project's anticipated solid waste generation.

- g. Comply with federal, state, and local statutes and regulations related to solid waste?**

Potentially Significant Impact. Construction of the Project would result in the generation of solid waste such as scrap lumber, concrete, residual wastes, packing materials, and plastics. Operation of the Project could potentially increase the volume of the solid waste stream from the Medical Center campus, because the Project would involve intensification of some of the uses on the site relative to existing conditions. The EIR will, therefore, examine the Project's compliance with federal, state, and local statutes and regulations related to solid waste.

XIX. Mandatory Findings of Significance

- a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Potentially Significant Impact. The Project has the potential to result in several potentially significant impacts that may degrade the quality of the environment. An EIR will be prepared to analyze these impacts and to determine their significance. As described in item B.IV of this Initial Study, the Project would not substantially reduce habitat areas, substantially affect fish or wildlife populations, threaten to eliminate a plant or animal community, or adversely affect a special-status species. As discussed in item B.V(a) of this Initial Study, the EIR will evaluate the historical significance of the buildings proposed for demolition or alteration and will determine whether the Project would have the potential to eliminate any important examples of the major periods of California history or prehistory.

- b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of a project are combined with the impacts of related projects near the project site such that impacts become greater than those of the project itself. The Project vicinity includes other past, current, and/or reasonably foreseeable future projects. The impacts of these projects, when combined with those of the Project, could contribute to cumulatively considerable impacts. The EIR will therefore include a cumulative impact analysis for each of the issues determined to be potentially significant within this Initial Study. Cumulative impacts associated with the issues determined to be less than significant within this Initial Study are discussed below.

With regard to cumulative effects for the issues of agricultural resources and mineral resources, the Project would have no impact to these resources and, therefore, would not combine with other projects to result in cumulatively considerable impacts. As such, no cumulative impact to agricultural resources and mineral resources would occur as a result of implementing the Project, and no further evaluation of these issues is required in the EIR.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. As discussed in this Initial Study, the Project could result in potentially significant impacts in the categories of aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation and traffic, tribal cultural resources, and utilities and service systems. These impacts could have potentially adverse effects on human beings. As such, further analysis of these impacts will be provided in an EIR.

A-2 Notice of Preparation



NOTICE OF PREPARATION
OF ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING

September 21, 2017

CASE NO.: ENV-2015-4476-EIR

PROJECT NAME: Kaiser Permanente Los Angeles Medical Center Project

PROJECT APPLICANT: Kaiser Foundation Hospitals (also known as Kaiser Permanente or Kaiser)

PROJECT ADDRESS: 1317, 1321, 1329, & 1345 North Vermont Avenue; 1328 North New Hampshire Avenue; 4760 Sunset Boulevard; 1505 North Edgemont Street; 1526 North Edgemont Street; 1517 North Vermont Avenue; 1430 & 1424 North Alexandria Avenue Los Angeles, California 90027

COMMUNITY PLANNING AREA: Hollywood

COUNCIL DISTRICT: 13 – O’Farrell

PUBLIC COMMENT PERIOD: September 21, 2017–October 20, 2017

SCOPING MEETING: October 2, 2017, 5:00 P.M.–7:00 P.M. See below for additional information.

The City of Los Angeles (City) intends to prepare an Environmental Impact Report (EIR) for the proposed Kaiser Permanente Los Angeles Medical Center Project (Project). In accordance with Section 15082 of the California Environmental Quality Act (CEQA) Guidelines, the City has prepared this Notice of Preparation to provide the public, nearby residents and property owners, responsible agencies, and other interested parties with information regarding the Project and its potential environmental effects. The EIR will be prepared by outside consultants under the supervision of the City of Los Angeles, Department of City Planning.

The City requests your written comments as to the scope and contents of the EIR, including mitigation measures or project alternatives to reduce potential environmental effects from the Project. Comments must be submitted in writing according to directions below. If you represent a public agency, the City seeks written comments on the scope and content of the environmental information in the EIR that are germane to your agency’s statutory responsibilities in connection with the Project. Your agency may need to use the EIR prepared by the City when considering your permit or other approval for the Project.

A Public Scoping Meeting will be held to receive input as to what environmental topics the EIR should study. No decisions about the Project are made at the Public Scoping Meeting. Additional Project details, meeting information, and instructions for public comment submittal are listed below.

PROJECT LOCATION AND EXISTING ON-SITE USES: The Project location is on and adjacent to the 15.34-acre Kaiser Los Angeles Medical Center (Medical Center), which is located along Sunset Boulevard between North Alexandria Avenue and North Vermont Avenue in the Hollywood Community Plan Area of the City of Los Angeles. (See attached Project Location Map & Scoping Meeting Location). The Medical Center and the properties proposed for redevelopment are within a Unified Hospital Development boundary. The existing Medical Center campus consists of a collection of medical buildings and parking structures, several of which are proposed for demolition as part of the Project. The term “Project site” refers to the properties on which the proposed redevelopment would occur. These properties are shown in the attached Proposed Site Plan as the “Proposed Project/Building Site.”

PROJECT DESCRIPTION: The Project is proposing to replace medical office buildings of the Kaiser Permanente Medical Center campus and build new health care facilities on adjacent parcels of land. The Project would proceed under a Master Plan/Development Plan Permit. The Project is proposed to be implemented in three phases and would include new and replacement medical office buildings, procedure centers, hospital additions, and parking structures on the Project site, as shown in the tables below. The Project’s phased development would occur between 2020 and 2030.

Existing Uses To Be Removed

Existing Uses	Size (square feet, sf)
Medical	199,891 sf
Commercial and Residential	15,517 sf
Parking Building	19,199 sf

Project Summary Table

Existing Uses to be Removed	Proposed Uses
Phase 1 (2020–2024)	
<i>Site 1 (1345 North Vermont Avenue): New Medical Office Building (MOB) and Parking Structure</i>	
<ul style="list-style-type: none"> • 15,517 sf of single-story commercial and residential structures (6 structures in total); surface parking lots 	<ul style="list-style-type: none"> • MOB (128,500 sf) and 582-stall parking structure (285,870 sf) • 129 feet in height (9 stories; 5 above grade, 4 below grade)
<i>Site 2 (4760 Sunset Boulevard): Procedure Center Addition</i>	
<ul style="list-style-type: none"> • 39 surface parking stalls 	<ul style="list-style-type: none"> • 50,000-sf Procedure Center addition to an existing MOB at 4760 Sunset Boulevard (for a total of 110,000-sf medical office space at this property); 10 parking stalls to remain • 100 feet in height (4 stories) above grade
<i>Site 3 (1505 North Edgemont Street): Demolition of an Existing MOB</i>	
<ul style="list-style-type: none"> • 79,335-sf MOB • 103 feet in height (7 stories) above grade 	<ul style="list-style-type: none"> • New construction at this site to occur during Phase 3
<i>Site 4 (1526 North Edgemont Street): Demolition of an Existing MOB</i>	
<ul style="list-style-type: none"> • 120,556-sf MOB • 8 stories, above grade 	<ul style="list-style-type: none"> • New construction at this site to occur during Phase 2
Phase 2 (2024–2028)	
<i>Site 5 (1517 North Vermont Avenue): New Parking Structure</i>	
<ul style="list-style-type: none"> • 19,199-sf parking structure with 186 stalls • 4 stories (2 above grade, 2 below grade) 	<ul style="list-style-type: none"> • 246,566-sf parking structure with 636 stalls • 2,300 sf of ground floor retail/commercial space • 90 feet in height (10 stories, with 8 above grade, 2 below grade)
<i>Site 4 (1526 North Edgemont Street): Reconstructed MOB or Hospital Addition</i>	
<ul style="list-style-type: none"> • Demolition at this site to occur during Phase 1 	<ul style="list-style-type: none"> • 132,700-sf MOB • 89 feet in height (6 stories, with 5 above grade, 1 below grade) <p>OR</p> <ul style="list-style-type: none"> • 161,600-sf, 105-bed hospital addition and bridge connections to existing hospital • 105 feet in height (6 stories, with 5 above grade, 1 below grade)
Phase 3 (2028–2030)	
<i>Site 6 (1430 & 1424 North Alexandria Avenue): Parking Structure Addition</i>	
<ul style="list-style-type: none"> • Existing surface parking area and temporary, single-story structure at 1430 & 1424 North Alexandria 	<ul style="list-style-type: none"> • 200-stall parking structure addition at 1430 & 1424 North Alexandria (122,579 sf) • 90 feet in height (8 stories above grade)
<i>Site 3 (1505 North Edgemont Street): New Medical Offices</i>	
<ul style="list-style-type: none"> • Demolition at this site to occur during Phase 1 	<ul style="list-style-type: none"> • 85,000-sf medical offices • 85 feet in height (5 stories above grade)
Totals	
Building and Parking Structure Square Footage	
Total demolition	234,607 sf
Total new construction	1,082,415 sf
Net increase	847,808 sf
Parking	
Total removed	225 spaces (Phase 1 & 2), 9 spaces (Phase 3)
Total new	1,234 spaces (Phase 1 & 2), 200 spaces (Phase 3)
Net increase	1,200 spaces

REQUESTED APPROVALS/PERMITS: The Project applicant is requesting the following entitlements from the City of Los Angeles:

- (1) Pursuant to Los Angeles Charter Section 555 and Los Angeles Municipal Code (LAMC) Section 11.5.7-G, Specific Plan Amendment for a project located within the Vermont/Western Transit Oriented District Specific Plan/Station Neighborhood Area Plan (SNAP) area to:
 - Amend Section 4 of the SNAP to revise the Definition of a Unified Hospital Development Site.
 - Permit signs that the SNAP specifically identifies as prohibited signs.
 - Permit a boundary change to the SNAP, to include the properties at 1430 & 1424 North Alexandria Avenue and 1423 North Kenmore Avenue within Subarea C of the SNAP boundaries.
 - Permit a boundary change to the SNAP, to include the properties at 1549 North Edgemont Street and 1559 North Edgemont Street within Subarea C in lieu of Subarea B.
- (2) Pursuant to LAMC Section 11.5.7-C, Project Permit Compliance Review for a project located within the SNAP area.
- (3) Pursuant to LAMC Section 16.05, Site Plan Review to permit a development project which creates, or results in an increase of, 50,000 gross square feet or more of nonresidential floor area.
- (4) Pursuant to LAMC Section 17.15, Vesting Tentative Tract Map No. 74846 to permit the merger and resubdivision of existing parcels into six ground lots.
- (5) Pursuant to LAMC Section 17.15, Vesting Tentative Tract Map No. 74847 to permit the merger of existing parcels into one ground lot.
- (6) Pursuant to LAMC Section 17.15, Vesting Tentative Tract Map No. 74848 to permit the merger of existing parcels into one ground lot.
- (7) Development Agreement, pursuant to Government Code Sections 65864-65869.5.
- (8) Associated building permits, including demolition permits, grading permits, excavation permits, and foundation permits.
- (9) Haul route approval and other entitlements and approvals as deemed necessary, and as required by the City to implement the Project.

POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT: Based on the Initial Study, the Project could have potentially significant environmental impacts in the following topic areas, which will be addressed in the EIR: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Transportation/Traffic, Tribal Cultural Resources, and Utilities and Service Systems. The EIR will also consider impacts to energy conservation pursuant to Appendix F.

PUBLIC SCOPING MEETING: A Public Scoping Meeting will be held in **an open house format** to share information regarding the Project and the environmental review process and to receive written comments about the scope and content of the environmental analysis to be addressed in the EIR. City staff, environmental consultants, and project representatives will be available, but no formal presentation is scheduled. You may stop by at any time during the hours listed below to view materials, ask questions, and provide written comments. The City encourages all interested individuals and organizations to attend this meeting. Written comments may be submitted, but there will be no verbal comments or public testimony taken at the Scoping Meeting. No decisions about the Project will be made at the Scoping Meeting. A separate public hearing for Municipal Code entitlement requests will be scheduled after the completion of the EIR. The date, time, and location of the public scoping meeting are as follows:

Date: Monday, October 2, 2017
Time: 5:00 P.M.–7:00 P.M.
Location: Kaiser Permanente Los Angeles Medical Center, 4867 Sunset Boulevard,
2 North Conference Room, Los Angeles, CA 90027

Parking is available at 1549 North Edgemont Street.

FILE REVIEW AND COMMENTS: The enclosed materials reflect the scope of the Project. The environmental file is available for public review at the City of Los Angeles, Department of City Planning, 200 N. Spring Street, Room 750, Los Angeles, CA 90012, during office hours Monday–Friday, 9:00 A.M.–4:00 P.M. A copy of this notice and the Initial Study prepared for the project may be viewed with the environmental file or online at <http://planning.lacity.org> by clicking on the “Environmental Review” tab, then “Notice of Preparation & Public Scoping Meetings.”

The City will consider all written comments regarding the potential environmental effects of the Project and issues to be addressed in the EIR. **Written comments must be submitted by 4:00 P.M., October 20, 2017.** Written comments will also be accepted at the scoping meeting described above.

Please direct your comments to:

Mail: Alejandro A. Huerta
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
E-mail: alejandro.huerta@lacity.org

ACCOMMODATIONS: As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability. The Public Scoping Meeting facility and its parking are wheelchair accessible. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or services may be provided upon request. Other services, such as translation between English and other languages, may also be provided upon written request submitted a minimum of seven (7) working days in advance to: per.planning@lacity.org. Be sure to identify the language you need English to be translated into, and indicate if the request is for oral or written translation services. If translation of a written document is requested, please include the document to be translated as an attachment to your email.


Alejandro A. Huerta
Major Projects Section
Department of City Planning
213-978-1454

Attachments:

Project Location Map & Scoping Meeting Location
Proposed Site Plan

Puede obtener información en Español acerca de esta junta llamando al (213) 978-1454.



SOURCE: Bing Maps 2017

Project Location Map & Scoping Meeting Location



SOURCE: Perkins and Will, 2017

Proposed Site Plan

Kaiser Permanente Los Angeles Medical Center Project

A-3 CommentLetters



EDMUND G. BROWN JR.
GOVERNOR

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



KEN ALEX
DIRECTOR

Notice of Preparation

September 21, 2017

RECEIVED
CITY OF LOS ANGELES

OCT 04 2017

MAJOR PROJECTS
UNIT

To: Reviewing Agencies

Re: Kaiser Permanente Los Angeles Medical Center Project
SCH# 2017091061

Attached for your review and comment is the Notice of Preparation (NOP) for the Kaiser Permanente Los Angeles Medical Center Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Alejandro A. Huerta
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

Document Details Report
State Clearinghouse Data Base

SCH#	2017091061
Project Title	Kaiser Permanente Los Angeles Medical Center Project
Lead Agency	Los Angeles, City of
Type	NOP Notice of Preparation
Description	The project proposes to expand the existing Kaiser Permanente Los Angeles Medical Center campus by replacing some of the existing facilities and by adding new buildings. The project would involve demolition of 234,607 square feet of existing medical, parking, commercial, and residential use on several properties within and adjacent to the existing Medical Center campus. These existing uses would be replaced with new mical buildings totaling 427,400 square feet and new parking structures totaling 655,015 square feet.

Lead Agency Contact

Name	Alejandro A. Huerta
Agency	City of Los Angeles
Phone	(213) 978-1454
email	
Address	200 N. Spring Street, Room 750
City	Los Angeles
	State CA Zip 90012

Fax

Project Location

County	Los Angeles
City	Los Angeles, City of
Region	
Cross Streets	Sunset Boulevard and North Edgemont Street
Lat / Long	34° 5' 53" N / 118° 17' 40" W
Parcel No.	Various
Township	1S
	Range 13,14W
	Section 7,12
	Base

Proximity to:

Highways	SR 2
Airports	
Railways	Metro
Waterways	Los Angeles River
Schools	LAUSD/ Los Feliz ES
Land Use	Z: C2-CSA1 (Commercial); GPLUD: Community Commercial

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Cumulative Effects; Growth Inducing; Landuse; Water Quality; Water Supply; Wetland/Riparian

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

Date Received 09/21/2017 **Start of Review** 09/21/2017 **End of Review** 10/20/2017

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613

For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

2017001061

Project Title: Kaiser Permanente Los Angeles Medical Center Project

Lead Agency: City of Los Angeles

Contact Person: Alejandro A. Huerta

Mailing Address: 200 North Spring Street, Room 750

Phone: 213-978-1454

City: Los Angeles

Zip: 90012

County: Los Angeles

Project Location: County: Los Angeles

City/Nearest Community: Los Angeles

Cross Streets: Sunset Boulevard and North Edgemont Street

Zip Code: 90027

Longitude/Latitude (degrees, minutes and seconds): 34 ° 5' 53" N / 118 ° 17' 40" W Total Acres: 15

Assessor's Parcel No.: numerous

Section: 07, 12 Twp.: 1S Range: 13, 14W Base: _____

Within 2 Miles: State Hwy #: SR 2

Waterways: Los Angeles River

Airports: none

Railways: Metro

Schools: LAUSD / Los Feliz ES

Document Type:

CEQA: NOP

Draft EIR

NEPA: NOI

Other: Joint Document

Early Cons

Supplement/Subsequent EIR

EA

Final Document

Neg Dec

(Prior SCH No.) _____

Draft EIS

Governor's Office of Planning & Research
PONI

Mit Neg Dec

Other: _____

SEP 21-2017

Local Action Type:

General Plan Update

Specific Plan

Rezone

Annexation

General Plan Amendment

Master Plan

Prezone

Redevelopment

General Plan Element

Planned Unit Development

Use Permit

Coastal Permit

Community Plan

Site Plan

Land Division (Subdivision, etc.)

Other: SP Amendment

Development Type:

Residential: Units _____

Acres _____

Transportation: Type _____

Office: Sq.ft. _____

Acres _____

Mining: Mineral _____

Commercial: Sq.ft. _____

Acres _____

Power: Type _____ MW _____

Industrial: Sq.ft. _____

Acres _____

Waste Treatment: Type _____ MGD _____

Educational: _____

Hazardous Waste: Type _____

Recreational: _____

Other: medical offices & parking buildings (1,082,415 sq. ft.)

Water Facilities: Type _____

MGD _____

Vegetation

Project Issues Discussed in Document:

Aesthetic/Visual

Fiscal

Recreation/Parks

Water Quality

Agricultural Land

Flood Plain/Flooding

Schools/Universities

Water Supply/Groundwater

Air Quality

Forest Land/Fire Hazard

Septic Systems

Wetland/Riparian

Archeological/Historical

Geologic/Seismic

Sewer Capacity

Growth Inducement

Biological Resources

Minerals

Soil Erosion/Compaction/Grading

Land Use

Coastal Zone

Noise

Solid Waste

Cumulative Effects

Drainage/Absorption

Population/Housing Balance

Toxic/Hazardous

Other: _____

Economic/Jobs

Public Services/Facilities

Traffic/Circulation

Present Land Use/Zoning/General Plan Designation:

Zoning: C2-CSA1 (Commercial); General Plan Land Use Designation: Community Commercial

Project Description: (please use a separate page if necessary)

The Project proposes to expand the existing Kaiser Permanente Los Angeles Medical Center campus by replacing some of the existing facilities and by adding new buildings. The Project would involve demolition of 234,607 square feet of existing medical, parking, commercial, and residential uses on several properties within and adjacent to the existing Medical Center campus. These existing uses would be replaced with new medical buildings totaling 427,400 square feet and new parking structures totaling 655,015 square feet.



NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department
 1550 Harbor Blvd., Suite 100
 West Sacramento, CA 95691
 Phone (916) 373-3710

September 26, 2017

RECEIVED
CITY OF LOS ANGELES

OCT 04 2017

MAJOR PROJECTS
UNIT

Alejandro A. Huerta
 City of Los Angeles
 200 N. Spring Street, Room 750
 Los Angeles, CA 90012

Sent via e-mail: alejandro.huerta@lacity.org

RE: SCH# 2017091061; Kaiser Permanente Los Angeles Project, City of Los Angeles; Los Angeles County, California

Dear Mr. Huerta:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for Draft Environmental Impact Report for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd. (a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf>. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
 - Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
 - Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
 - Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

This process should be documented in the Cultural Resources section of your environmental document.

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation..
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

- b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
- 3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
- 4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at gayle.totton@nahc.ca.gov.

Sincerely,



Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst
(916) 373-3714

cc: State Clearinghouse

Sabrina Alonso

From: Alejandro Huerta <alejandro.huerta@lacity.org>
Sent: Thursday, September 28, 2017 2:58 PM
To: Ruta Thomas
Subject: Fwd: Kaiser PermanentLA Medical Center Project

NOP comment:

----- Forwarded message -----

From: **eleazar jr onglatco** <elijrmd@hotmail.com>
Date: Thu, Sep 28, 2017 at 2:56 PM
Subject: Kaiser PermanenteLA Medical Center Project
To: "alejandro.huerta@lacity.org" <alejandro.huerta@lacity.org>

Hi Sir Huerta,

I am living with my elderly parents beside and behind the kaisser project in north new hampshire area. The project would be detrimental to both my elderly parents who are suffering from asthma, hypertension etc. They are very sensitive to sound and air pollution. The construction will greatly affect them. Hoping that you will consider my parents plight in presenting the hazards of these projects to the community. Thank you.
Eleazar Onglatco Jr.

Sent from my MetroPCS 4G LTE Android Device



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

Alejandro.huerta@lacity.org

Alejandro Huerta
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

October 17, 2017

Notice of Preparation of an Environmental Impact Report for the Kaiser Permanente Los Angeles Medical Center Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send SCAQMD a copy of the EIR upon its completion. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹.** These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

Air Quality Analysis

SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from SCAQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to SCAQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts.

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

SCAQMD's CEQA regional pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

- Chapter 11 of SCAQMD's CEQA Air Quality Handbook
- SCAQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits

In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency for the Proposed Project. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at SCAQMD's webpage at: <http://www.aqmd.gov>.

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and any significant impacts are mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or call me at (909) 396-3308.

Sincerely,



Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS

LAC170921-03

Control Number



HOLLYWOOD HERITAGE, INC.

P.O. Box 2586
Hollywood, CA 90078
(323) 874-4005 • FAX (323) 465-5993

October 19, 2017

Alejandro A. Huerta
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
alejandro.huerta@lacity.org

Re: PUBLIC COMMENT: Notice of Preparation of an Environmental Impact Report for Kaiser Permanente Los Angeles Medical Center Project (Case No. ENV-2015-4476-EIR)

Dear Mr. Huerta:

Hollywood Heritage, an historic preservation organization with a robust and engaged membership, is sending this letter in response to the Notice of Preparation (NOP) published by Los Angeles Department of City Planning (City Planning) as part of the **Kaiser Permanente Project** scoping for the preparation of the **Environmental Impact Report # ENV-2015-4476-EIR**.

Specifically, Hollywood Heritage is writing to express its concern regarding the proximity of the **Kaiser Permanente Project** to the southern border and southwestern corner of Barnsdall Park, a National Historic Landmark home to the Hollyhock House designed by Frank Lloyd Wright. Hollywood Heritage asks that the Draft Environmental Impact Report (DEIR) carefully consider potential impacts of the Project on this invaluable historic resource.

Sincerely,

A handwritten signature in blue ink that reads "Richard Adkins".

Richard Adkins
President, Hollywood Heritage, Inc.

CC: Los Angeles Conservancy, Los Angeles Office of Historic Resources, Council District 13,
Council District 4



October 20, 2017

Mr. Alejandro A. Huerta,
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, California 90012
Phone: (213) 978-1454
E-mail: alejandro.huerta@lacity.org

SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
818 West 7th Street, 12th Floor
Los Angeles, CA 90017
T: (213) 236-1800
F: (213) 236-1895
www.scag.ca.gov

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Curt Hagman, San Bernardino County

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Kaiser Permanente Los Angeles Medical Center Project [SCAG NO. IGR9402]

Dear Mr. Huerta,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Kaiser Permanente Los Angeles Medical Center Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) goals and align with RTP/SCS policies.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Kaiser Permanente Los Angeles Medical Center Project. The proposed project consists of the replacement of medical office buildings and the construction of new health care facilities totaling 1,082,415 square feet on 15.34 acres. Additionally, the project would provide 1,434 parking spaces on-site.

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to au@scag.ca.gov providing, at a minimum, the full public comment period for review. If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Assistant Regional Planner, at (213) 236-1874 or au@scag.ca.gov. Thank you.

Sincerely,

Ping Chang

Ping Chang
Acting Manager, Compliance and Performance Monitoring

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
KAISER PERMANENTE LOS ANGELES MEDICAL CENTER PROJECT [SCAG NO. IGR9402]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

2016 RTP/SCS GOALS

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see <http://scagrtpsc.net/Pages/FINAL2016RTPSCS.aspx>). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

SCAG 2016 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and active transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</i>

*SCAG does not yet have an agreed-upon security performance measure.

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG 2016 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

2016 RTP/SCS STRATEGIES

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendices of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: <http://scagrtpsc.net/Pages/FINAL2016RTPSCS.aspx>. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit <http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf>. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted City of Los Angeles Forecasts		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	4,017,000	4,442,500	4,609,400
Households	6,458,000	7,325,000	7,412,300	1,441,400	1,618,900	1,690,300
Employment	8,414,000	9,441,000	9,871,500	1,899,500	2,104,100	2,169,100

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG's Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: <http://scagrtpsc.net/Pages/FINAL2016PEIR.aspx>). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site-specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.



Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

October 20, 2017

Alejandro A. Huerta
Department of City Planning
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RE: Kaiser Permanente Los Angeles Medical Center Project – 1317-45 North Vermont Avenue, 1328 North New Hampshire Avenue, 4760 Sunset Boulevard, 1505 N Edgemont Street, 1526 N Edgemont Street, 1517 North Vermont Avenue, 1424-30 N Alexandria Avenue – Notice of Preparation of a Draft Environmental Impact Report – ENV-2015-4476-EIR

Dear Mr. Huerta:

Thank you for the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the Kaiser Permanente Los Angeles Medical Center Project located in the City of Los Angeles. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Metro is committed to working with stakeholders across the County to support the development of transit oriented communities (TOCs). TOCs are built by considering transit within a broader community and creating vibrant, compact, walkable, and bikeable places centered around transit stations and hubs with the goal of encouraging the use of transit and other alternatives to driving. Metro looks forward to collaborating with local municipalities, developers, and other stakeholders in their land use planning and development efforts, and to find partnerships that support TOCs across Los Angeles County.

Project Description

The Project is proposing to replace medical office buildings of the Kaiser Permanente Medical Center campus and build new health care facilities on adjacent parcels of land. The Project would proceed under a Master Plan/Development Plan Permit. The Project is proposed to be implemented in three phases and would include new and replacement medical office buildings, procedure centers, hospital additions, and parking structures. The proposed Project includes the replacement of existing buildings with multi-story buildings with subterranean parking along Vermont Avenue.

Metro Comments

Metro Rail Adjacency

It is noted that portions of the Project, including proposed facilities at 1345 and 1526 North Vermont Avenue, are in close proximity to the Metro Red Line subway tunnel, and parts are adjacent to the Vermont/Sunset Station (Station). While Metro strongly supports development near transit, the following concerns related to the project's proximity to the subway tunnel should be addressed:

Kaiser Permanente Los Angeles Medical Center Project
Notice of Preparation EIR– Metro Comments
10/20/17

1. The project sponsor should be advised that the Metro Red Line subway may operate peak service as often as every four minutes in both directions and that trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the tunnel below the proposed project.
2. The construction and operation of the proposed project must not disrupt the operation and maintenance activities of the Metro Red Line or the structural and systems integrity of Metro's Red Line subway tunnels.
3. Considering the proximity of the proposed project to the subway tunnel, it is expected that rail operations may produce noise and vibration. A recorded Noise Easement Deed in favor of Metro is required prior to the completion and/or occupancy of the project, a form of which is attached. In addition, any noise mitigation required for the Project must be borne by the developers of the Project and not Metro. The easement recorded in the Deed will extend to successors and tenants, as well.
4. Consistent with ZI No. 1117, prior to the City issuing a building permit within 100 feet of the Metro Rail construction area, clearance shall be obtained from Metro. Metro Operations must review construction plans and operations prior to any permits being issued. Metro will need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations. Please refer to the attached Metro "Design Criteria and Standards, Volume III - Adjacent Construction Design Manual" for more details regarding submitting drawings and calculations to Metro for review. Please note that Metro requires an Engineering Review Fee for evaluation of any impacts based on adjacency and relationship of the proposed building to the Metro existing structures.
5. Metro staff shall be permitted to monitor construction activity to ascertain any impact to the subway tunnel.
6. The project sponsor should be advised that Metro may request reimbursement for costs incurred as a result of project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure.
7. The project sponsor will be required to notify Metro of any changes to the construction/building plans that may or may not impact the subway tunnel.
8. Aspet Davidian, Sr. Director, Project Engineering Facilities, should be contacted at 213-922-5258 regarding the project's potential impacts on Metro's Red Line station structures and tunnels.

Bus Stop Adjacent

Metro Bus Lines 2 & 175 operate on Sunset Boulevard, and Lines 204, 206, 217, and 754 operate on Vermont Avenue, adjacent to the proposed Project. Several bus stops are directly adjacent to the proposed Project. The following comments relate to bus operations and the bus stops:

1. Although the Project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus facilities and services that are present. The existing Metro bus stop must be maintained as part of the final Project.
2. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus Operations. Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 at least 30 days in advance of initiating construction activities. Other municipal buses may also be impacted and should be included in construction outreach efforts.
3. Metro encourages the installation of bus shelters with benches, way finding signage, enhanced crosswalks and ramps compliant with the Americans with Disabilities Act (ADA), as well as

pedestrian lighting and shade trees in paths of travel to access transit stops and other amenities that improve safety and comfort for transit riders. The City should consider requesting the installation of such amenities as part of the development of the site.

4. Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.
5. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.

Transit Orientation

Considering the proximity to the Red Line Vermont/Sunset Station, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of the developments. Metro encourages the City and Project sponsor to be mindful of the Project's proximity to the Vermont/Sunset Station, including orienting pedestrian pathways toward the station.
2. Metro would like to inform the Project sponsor of Metro's employer transit pass programs including the Annual Transit Access Pass (A-TAP) and Business Transit Access Pass (B-TAP) programs which offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. For more information on these programs, contact Devon Deming at 213-922-7957 or DemingD@metro.net.
3. Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities or parking benefit districts. These strategies could be pursued to encourage more transit-oriented development and reduce automobile-orientation in design and travel demand.
4. With an anticipated increase in traffic, Metro encourages an analysis of impacts on non-motorized transportation modes and consideration of improved non-motorized access to the station including pedestrian connections and bike lanes/paths. Appropriate analyses could include multi-modal LOS calculations, pedestrian audits, etc.
5. Metro encourages the installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along the primary building frontage to improve pedestrian safety and comfort to access the nearby bus stops. The City should consider requesting the installation of such amenities as part of the development of the site.

Active Transportation

Metro encourages the City to work with the applicant to promote bicycle use through adequate short-term bicycle parking, such as ground level bicycle racks, as well as secure and enclosed long-term bicycle parking for guests and employees. The Project applicant should coordinate with Metro Bike Share program for potential Bike Share station at this development. Additionally, the applicant should help facilitate safe and

convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations such as Vermont/Sunset Station. The Project is also encouraged to support these connections with wayfinding signage inclusive of all modes of transportation.

Congestion Management Program

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

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

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

If you have any questions regarding this response, please contact Derek Hull at 213-922-3051 or by email at DevReview@metro.net. Metro looks forward to reviewing the Draft EIR. Please send it to the following address:

Metro Development Review
One Gateway Plaza MS 99-18-3
Los Angeles, CA 90012-2952

Sincerely,



Derek Hull

Manager, Transportation Planning

Attachments: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis
 Noise Easement Deed
 Design Criteria and Standards, Volume III - Adjacent Construction Design Manual

ADJACENT CONSTRUCTION DESIGN MANUAL

1.0 INTRODUCTION

- 1.1 Parties planning construction over, under or adjacent to a Metropolitan Transportation Authority (MTA) facilities~~s~~ or structures are advised to submit for review ~~seven (7)~~**two (2)** hard copies and **one (1)** electronic copy of their design drawings and ~~four (4)~~ copies of their calculations showing the relationship between their project and the MTA facilities, for MTA review. The purpose of the MTA review is to reduce the chance of conflict, damage, and unnecessary remedial measures for both MTA and the parties. Parties are defined as developers, agencies, municipalities, property owners or similar organizations proposing to perform or sponsor construction work near MTA facilities.
- 1.2 Sufficient drawings and details shall be submitted at each level of completion such as Preliminary, In-Progress, Pre-final and Final, etc. to facilitate the review of the effects that the proposed project may or may not have on the MTA facilities. An MTA review requires internal circulation of the construction drawings to concerned departments (~~usually includes Construction, Operations, Maintenance, and Real Estate~~)**for MTA departments review**. Parties shall be responsible for all costs related to **MTA** drawing reviews by MTA. MTA costs shall be based upon the actual hours taken for review at the hourly rate of pay plus overhead charges. Drawings normally required for review are:
- A. Site Plan
 - B. Drainage Area Maps and Drainage Calculations
 - C. Architectural drawings
 - D. Structural drawings and calculations
 - E. Civil Drawings
 - F. Utility Drawings
 - G. Sections showing Foundations and MTA Structures
 - H. Column Load Tables
 - I. Pertinent Drawings and calculations detailing an impact on MTA facilities
 - J. A copy of the Geotechnical Report.
 - K. Construction zone traffic safety and detour plans: Provide and regulate positive traffic guidance and definition for vehicular and pedestrian traffic adjacent to the construction site to ensure traffic safety and reduce adverse traffic circulation impact.
 - L. Drawings and calculations should be sent to:

**MTA Third Party Administration (Permits Administration)
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California 90012**

- 1.3 If uncertainty exists on the possible impacts a project may have on the MTA facilities, and before submitting a formal letter requesting a review of a construction project adjacent to the Metro System, the party or his agent may contact the MTA Third Party Administrator (Permits). The Party shall review the complexity of the project, and **contact MTA** to receive an informal evaluation of the amount of detail required for the MTA review. In those cases, whereby it appears the project will present no risk to MTA, the Third Party Administrator (Permits) shall immediately route the design documents to **Engineering**, Construction, Operations, Maintenance, and Real Estate departments for a preliminary evaluation. If it is then confirmed that MTA risk is not present, the Administrator shall process an approval letter to the party.
- 1.4 A period of 30 working days should be allowed for review of the drawings and calculations. Thirty (30) work days should be allowed for each successive review as required. It is noted that preliminary evaluations are usually produced within 5 working days.
- 1.5 The party shall reimburse the MTA for any technical review or support services costs incurred that are associated with his/her request for access to the Metro **Transit Rail System**
- 1.6 The following items must be completed before starting any construction:
 - A. Each part of the project's design may be reviewed and approved by the MTA. The prime concern of the MTA is to determine the effect of the project on the MTA structure and its transit operations. A few of the other parts of a project to be considered are overhead protection, dust protection, dewatering, and temporary use of public space for construction activities.
 - B. Once the Party has received written acceptance of the design of a given project then the Party must notify MTA prior to the start of construction, in accordance with the terms of acceptance.
- 1.7 Qualified Seismic, Structural and Geotechnical Oversight

The design documents shall note the name of the responsible Structural Engineer and Geotechnical Engineer, licensed in the State of California.

2.0 REVIEW PROCEDURE

- 2.1 All portions of any proposed design that will have a direct impact on an MTA facility or structure will be reviewed to assure that the MTA facility or structure is not placed in risk at any time, and that the design meets all applicable codes and criteria. Any portion of the proposed design that is to form part of an MTA controlled area shall be designed to meet the MTA Design Criteria and Standards.
- 2.2 Permits, where required by the local jurisdiction, shall be the responsibility of the party. City of L.A. Dept. of Bldg. and Safety and the Bureau of Engineering permit review shall remain in effect. Party shall refer to MTA Third Party Administration policies and procedures, THD5 for additional information.
- 2.3 Monitoring of the temporary support of excavation structures for adjacent construction shall be required in all cases for excavations within the geotechnical zone of influence of MTA structures. The extent of the monitoring will vary from case to case.

- 2.4 Monitoring of the inside of MTA tunnels and structures shall be required when the adjacent excavation will unload or load the MTA structure or tunnel. Monitoring of vertical and horizontal distortions will include use of extensometers, inclinometers, settlement reference points, tiltmeters, groundwater observation wells, tape extensometer anchor points and load cells, as appropriately required. Acceptable limits of movement will depend on groundwater conditions, soil types and also the length of service the stations and tunnels have gone through. Escorts will be required for the survey parties entering the Metro operating system in accordance with MTA Operating Rules and Procedures. An MTA account number will be established and the costs for the escort monitoring and surveying service will be billed directly to the party or his agent as in section 1.2.
- 2.5 The calculations submitted for review shall include the following:
- A. A concise statement of the problem and the purpose of the calculation.
 - B. Input data, applicable criteria, clearly stated assumptions and justifying rationale.
 - C. References to articles, manuals and source material shall be furnished with the calculations.
 - D. Reference to pertinent codes and standards.
 - E. Sufficient sketches or drawing references for the work to be easily understood by an independent reviewer. Diagrams indicating data (such as loads and dimensions) shall be included along with adequate sketches of all details not considered standard by MTA.
 - F. The source or derivation of all equations shall be shown where they are introduced into the calculations.
 - G. Numerical calculations shall clearly indicate type of measurement unit used.
 - H. Identify results and conclusions.
 - I. Calculations shall be neat, orderly, and legible.
- 2.6 When computer programs are used to perform calculations, the following information shall accompany the calculation, including the following:
- A. Program Name.
 - B. Program Abstract.
 - C. Program Purpose and Applications.
 - D. Complete descriptions of assumptions, capabilities and limitations.
 - E. Instructions for preparing problem data.
 - F. Instructions for problem execution.
 - G. List (and explanation) of program acronyms and error messages.
 - H. Description of deficiencies or uncorrected errors.
 - I. Description of output options and interpretations.
 - J. Sample problem(s), illustrating all input and output options and hardware execution statements. Typically, these problems shall be verified problems.
 - K. Computer printout of all supporting calculations.

- L. The "User's Manual" shall also include a certification section. The certification section shall describe the methods and how they cover the permitted options and uses of the program.
- 2.7 Drawings shall be drawn, to scale, showing the location and relationship of proposed adjacent construction to existing MTA structures at various stages of construction along the entire adjacent alignment. The stresses and deflections induced in the existing MTA structures should be provided.
- 2.8 The short-term and long-term effects of the new loading due to the adjacent construction on the MTA structures shall be provided. The soil parameters and other pertinent geotechnical criteria contained in existing contract documents for the affected structure, plus any additional conditions shall be used to analyze the existing MTA structures.
- 2.9 MTA structures shall be analyzed for differential pressure loadings transferred from the adjacent construction site.

3.0 MECHANICAL CRITERIA

- 3.1 Existing services to MTA facilities, including chilled water and condenser water piping, potable and fire water, storm and sanitary sewer, piping, are not to be used, interrupted nor disturbed without written approval of MTA.
- 3.2 Surface openings of ventilation shafts, emergency exits serving MTA underground facilities, and ventilation system openings of surface and elevated facilities are not to be blocked or restricted in any manner. Construction dust shall be prevented from entering MTA facilities.
- 3.3 Hot or foul air, fumes, smoke, steam, etc., from adjacent new or temporary facilities are not to be discharged within 40 feet of existing MTA ventilation system intake shafts, station entrances or portals. Tunnel ventilation shafts are both intake and discharge structures.
- 3.4 Clear access for the fire department to the MTA fire department connections shall be maintained at all times. Construction signs shall be provided to identify the location of MTA fire department connections. No interruption to fire protection water service will be permitted at any time.
- 3.5 Modifications to existing MTA mechanical systems and equipment, including ventilation shafts, required by new connections into the MTA System, shall only be permitted with prior review and approval by MTA. If changes are made to MTA property as built drawings shall be provided reflecting these changes.

At the option of MTA, the adjacent construction party shall be required to perform the field tests necessary to verify the adequacy of the modified system and the equipment performance. This verification shall be performed within an agreed time period jointly determined by MTA and the Party on a case by case basis. Where a modification is approved, the party shall be held responsible to maintain original operating capacity of the equipment and the system impacted by the modification.

4.0 OPERATIONAL REQUIREMENTS

4.1 GENERAL

- A. Normal construction practices must be augmented to insure adequate safety for the general public entering Metro Stations and riding on Metro Trains and Buses. Design of a building, structure, or facility shall take into account the special safety considerations required for the construction of the facility next to or around an operating transit system.
- B. Projects which require working over or adjacent to MTA station entrances shall develop their construction procedures and sequences of work to meet the following minimum requirements:
 - 1. Construction operations shall be planned, scheduled and carried out in a way that will afford the Metro patrons and the general public a clean, safe and orderly access and egress to the station entrance during revenue hours.
 - 2. Construction activities which involve swinging a crane and suspended loads over pedestrian areas, MTA station entrances and escalators, tracks or Metro bus passenger areas shall not be performed during revenue hours. Specific periods or hours shall be granted on a case-by-case basis, **with the approval of Construction Work Plan by MTA Construction Safety Department**.
 - 3. All cranes must be stored and secured facing away from energized tracks, when appropriate.
 - 4. All activity must be coordinated through the MTA Track Allocation process in advance of work activity. **All members of the work crew will be required to attend MTA Safety Training.**
 - 5. **In order to provide a safe zone to maintain adjacent developments. All developments adjacent to Metro At-Grade Stations, Aerial Stations or Track Guideways shall provide a minimum 5 foot setback from the Metro and developer's shared property line to the outside face of the proposed structure at Metro or the developer's property for maintenance to be performed or installed from within the zone created by this setbacks.**

4.2 OVERHEAD PROTECTION - Station Entrances

- A. Overhead protection from falling objects shall be provided over MTA facilities whenever there is possibility, due to the nature of a construction operation, that an object could fall in or around MTA station entrances, bus stops, elevators, or areas designed for public access to MTA facilities. Erection of the overhead protection for these areas shall be done during MTA non-revenue hours.
 - 1. The design live load for all overhead protection shall be 150 pounds per square foot minimum. The design wind load on the temporary structures shall be 20 pounds per square foot, on the windward and leeward sides of the structure.
 - 2. The overhead protection shall be constructed of fire rated materials. Materials and equipment shall not be stored on the completed shield. The roof of the

shield shall be constructed and maintained watertight.

- B. Lighting in public areas and around affected MTA facilities shall be provided under the overhead protection to maintain a minimum level of twenty-five (25) footcandles at the escalator treads or at the walking surface. The temporary lighting shall be maintained by the Party.
- C. Wooden construction fencing shall be installed at the boundary of the areas with public access. The fencing shall be at least eight-feet high, and shall meet all applicable code requirements.
- D. An unrestricted public access path shall be provided at the upper landing of the entrance escalator-way in accordance with the following:
 - 1. A vertical clearance between the walking surface and the lowest projection of the shield shall be 8'-0".
 - 2. A clear pedestrian runoff area extending beyond the escalator newel shall be provided, the least dimension of which shall be twenty (20) feet.
 - 3. A fifteen (15) foot wide strip (other than the sidewalk) shall be maintained on the side of the escalator for circulation when the escalator is pointed away from a street corner.
 - 4. A clear path from any MTA emergency exit to the public street shall be maintained at all times.
- E. Temporary sidewalks or pedestrian ways, which will be in use more than 10 days, shall be constructed of four (4") inch thick Portland cement concrete or four (4") inches of asphaltic concrete placed **over a minimum four (4") inches of untreated base material**, and finished by a machine.

4.3 OVERHEAD PROTECTION - Operating Right-of-Way Tackage

- A. MTA Rail Operations Control Center shall be informed of any intent to work above, on, or under the MTA right-of-way. Crews shall be trained and special flagging operations shall be directed by MTA Rail Operations Control Center. The party shall provide competent persons to serve as Flaggers. These Flaggers shall be trained and certified by MTA Rail Operations prior to any work commencing. All costs incurred by MTA shall be paid by the party.
- B. A construction project that will require work over, under or adjacent to the at grade and aerial MTA right-of-way should be aware that the operation of machinery, construction of scaffolding or any operation hazardous to the operation of the MTA facility shall require that the work be done during non-revenue hours and authorized through the MTA Track Allocation process.
- C. MTA flagmen or inspectors from MTA Operations shall observe all augering, pile driving or other work that is judged to be hazardous. Costs associated with the flagman or inspector shall be borne by the Party.

- D. The party shall request access rights or track rights to perform work during non-revenue hours. The request shall be made through the MTA Track Allocation process.-

4.4 OTHER METRO FACILITIES

- A. Access and egress from the public streets to fan shafts, vent shafts and emergency exits must be maintained at all times. The shafts shall be protected from dust and debris. See Exhibit A for details.
- B. Any excavation in the vicinity of MTA power lines feeding the Metro System shall be through hand excavation and only after authorization has been obtained through the MTA Track Allocation process. MTA Rail Operations Control Center shall be informed before any operations commences near the MTA power system.
- C. Flammable liquids shall not to be stored over or within 25 feet horizontally of MTA underground facilities. If installed within 25 to 100 feet horizontally of the structure, protective encasement of the tanks shall be required in accordance with NFPA STD 130. Existing underground tanks located within 100 feet horizontally of MTA facilities and scheduled to be abandoned are to be disposed of in accordance with Appendix C of NFPA STD 130. NFPA STD 130 shall also be applied to the construction of new fuel tanks.
- D. Isolation of MTA Facilities from Blast

Subsurface areas of new adjacent private buildings where the public has access or that cannot be guaranteed as a secure area, such as parking garages and commercial storage and warehousing, will be treated as areas of potential explosion. NFPA 130, Standard for Fixed Guideway Transit Systems, life safety separation criteria will be applied that assumes such spaces contain Class I flammable, or Class II or Class III Combustible liquids. For structural and other considerations, isolation for blast will be treated the same as seismic separation, and the more restrictive shall be applied.

- E. Any proposed facility that is located within 20 feet radius of an existing Metro facility will require a blast and explosion study and recommendations to be conducted by a specialist who is specialized in the area of blast force attenuation. This study must assess the effect that an explosion in the proposed non-Metro facility will have on the adjacent Metro facility and provide recommendations to prevent any catastrophic damage to the existing Metro facility. Metro must approve the qualifications of the proposed specialist prior to commencement of any work on this specialized study.

4.5 SAFETY REGULATIONS

- A. Comply with Cal/OSHA Compressed Air Safety Orders Title 8, Division 1, Chapter 4, Subchapter 3. Comply with California Code of Regulations Title 8, Title 29 Code of Federal Regulations; and/or the Construction Safety and Health Manual (Part F) of the contract whichever is most stringent in regulating the safety conditions to be maintained in the work environment as determined by the Authority. The Party recognizes that government promulgated safety regulations are minimum standards and that additional safeguards may be required

- B. Comply with the requirements of Chemical Hazards Safety and Health Plan, (per 29 CFR 1910.120 entitled, (Hazardous Waste Operations and Emergency Response) with respect to the handling of hazardous or contaminated wastes and mandated specialty raining and health screening.
- C. Party and contractor personnel while within the operating MTA right-of-way shall coordinate all safety rules and procedures with MTA Rail Operations Control Center.
- D. When support functions and electrical power outages are required, the approval MUST be obtained through the MTA Track Allocation procedure. Approval of the support functions and power outages must be obtained in writing prior to shutdown.

5.0 CORROSION

5.1 STRAY CURRENT PROTECTION

- A. Because stray currents may be present in the area of the project, the Party shall investigate the site for stray currents and provide the means for mitigation when warranted.
- B. Installers of facilities that will require a Cathodic Protection (CP) system must coordinate their CP proposals with MTA. Inquiries shall be routed to the Manager, Third Party Administration.
- C. The Party is responsible for damage caused by its contractors to MTA corrosion test facilities in public right-of-way.

End of Section

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

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

D.1 OBJECTIVE OF GUIDELINES

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

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

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

D.2 GENERAL PROVISIONS

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

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

D.3 PROJECTS SUBJECT TO ANALYSIS

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

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

D.4 STUDY AREA

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

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

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

D.5 BACKGROUND TRAFFIC CONDITIONS

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

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

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

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

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

D.6 PROPOSED PROJECT TRAFFIC GENERATION

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

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

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

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

D.7 TRIP DISTRIBUTION

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

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

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

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

D.8 IMPACT ANALYSIS

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

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

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

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

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

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

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

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

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

- ❑ Evidence that affected transit operators received the Notice of Preparation.
- ❑ A summary of existing transit services in the project area. Include local fixed-route services within a $\frac{1}{4}$ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- ❑ Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- ❑ Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
 - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
 - For each time period, multiply the result by one of the following factors:

3.5% of Total Person Trips Generated for most cases, except:

- 10% primarily Residential within 1/4 mile of a CMP transit center
- 15% primarily Commercial within 1/4 mile of a CMP transit center
- 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
- 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
- 5% primarily Residential within 1/4 mile of a CMP transit corridor
- 7% primarily Commercial within 1/4 mile of a CMP transit corridor
- 0% if no fixed route transit services operate within one mile of the project

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

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

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

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

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

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

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

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

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

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

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

D.10 REFERENCES

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

RECORDING REQUESTED BY
AND WHEN RECORDED MAIL TO:

LOS ANGELES COUNTY METROPOLITAN
TRANSPORTATION AUTHORITY
Real Estate Department
Deputy Executive Officer - Real Estate
P: 213-922-2415 F: 213-922-2400
One Gateway Plaza, Mail Stop 99-18-4
Los Angeles, CA 90012-2932

Space Above Line for Recorder's Use

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Public Agency - No Tax Statement

NOISE EASEMENT DEED

For valuable consideration, receipt of which is hereby acknowledged, **(Name of Owner)**, a _____, for themselves, their heirs, administrators, executors, successors, assigns, tenants, and lessees do hereby grant, bargain, sell, and convey to the **LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY**, a public agency existing under the authority of the laws of the State of California ("Grantee"), its successors and assigns, for the use and benefit of the public and its employees, a perpetual, assignable easement in that certain real property in the City of Los Angeles, County of Los Angeles, State of California described in Exhibit "A" attached hereto and incorporated herein by this reference,

Said easement shall encompass and cover the entirety of the Grantors' Property having the same boundaries as the described Property and extending from the sub-surface upwards to the limits of the atmosphere of the earth, the right to cause in said easement area such noise, vibrations, fumes, dust, fuel particles, light, sonic disturbances, and all other effects that may be caused or may have been caused by the operation of public transit vehicles traveling along the Project right of way.

Grantor hereby waives all rights to protest, object to, make a claim or bring suit or action of any purpose, including or not limited to, property damage or personal injuries, against Grantee, its successors and assigns, for any necessary operating and maintenance activities and changes related to the Project which may conflict with Grantors' use of Grantors' property for residential and other purposes, and Grantors hereby grants an easement to the Grantee for such activities.

The granting of said Easement shall also establish the Grantors' right to further modify or develop the Property for any permitted use. However, Grantor's rights of development shall not interfere with the continued operation of Grantee's Project.

It is understood and agreed that these covenants and agreements shall be permanent, perpetual, will run with the land and that notice shall be made to and shall be binding upon all heirs, administrators, executors, successors, assigns, tenants and lessees of the Grantor. The Grantee is hereby expressly granted the right of third party enforcement of this easement.

IN WITNESS WHEREOF, the undersigned has caused its/their signature to be affixed this day of _____, 20____

By: _____
Name

By: _____
Name

(ATTACH NOTARY SEAL AND CERTIFICATE HERE.)

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT**CIVIL CODE § 1189**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of _____)
On _____ before me, _____
Date _____ Here Insert Name and Title of the Officer
personally appeared _____
Name(s) of Signer(s) _____

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____
Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____ Document Date: _____

Number of Pages: _____ Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

- Corporate Officer — Title(s): _____
 Partner — Limited General
 Individual Attorney in Fact
 Trustee Guardian or Conservator
 Other: _____

Signer Is Representing: _____

Signer's Name: _____

- Corporate Officer — Title(s): _____
 Partner — Limited General
 Individual Attorney in Fact
 Trustee Guardian or Conservator
 Other: _____

Signer Is Representing: _____

CERTIFICATE OF ACCEPTANCE

This is to certify that the interest in the real property conveyed by the foregoing Grant Deed from _____, a **California Limited Partnership**, ("Grantor") to **LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY**, a public agency existing under the authority of the laws of the State of California ("LACMTA"), is hereby accepted by the undersigned on behalf of the LACMTA pursuant to authority conferred by resolution of the Board of Directors of the LACMTA, and the Grantee hereby consents to the recordation of this Deed by its duly authorized officer.

Dated this ____ day of _____, 20____

By: _____
Velma C. Marshall
Deputy Executive Officer - Real Estate

ENVIRONMENTAL ISSUES & IMPACTS

CEQA requires consideration of the following topics:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population/Housing
- Public Services
- Recreation
- Traffic/Transportation
- Tribal Cultural Resources
- Utilities/Service Systems

Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.

p.s.

Kaiser employees go home to quiet, this project is for them to get their salary paychecks, and you, the person reading this,

Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR, and offer potential alternatives and/or measures to avoid or reduce environmental impacts.

Been thru this on your last rebuild
tear down & "putting up" of your current
bldg. on lot next to me.
Went thru seeing damage to my
house (cracks, etc.) & on my cement.
I have myself repaired them ^{No cost to Kaiser}. I took
money out of my own pocket to repair.
Was told that Kaiser was NEVER going
to rebuild again!
NO, NEGATIVE Not unless recompense,
my answer, my life was eliminated during last
Myself and son health wise serious inability
to cope with noise, THUMPing Earth my ground
moving & NOISE unreal life.

COST, PAY for me to live some
else \$10,000.00 mth.

TOXIC CHEMICALS, ----- to cover existing plus
CONTACT INFORMATION (Optional, please print clearly)

Name: Kath Lewis Representing Agency or Organization:
1420 L.RON HUBBARD WAY, LA, my PROPERTY
Address: 90037 City/State/Zip: 90037

ERIN BROKOVICH is my friend No

To Whom This May Concern re: Kaiser building projects 10-7-2017
Some questions & concerns re: Kaiser Building projects

- ① How long will each building take to build?
- ② Does each building have a certain length of time it must be completed in?
- ③ What are the hours the construction will be taking place? From ? am till ? pm.
- ④ There is a great deal of dust that already enters our buildings from off the street and by air. The buildings demolitions & construction will cause a great deal of dust ^{air quality} pollution which is extremely bad for our lungs, sinuses & digestive system. How can you prevent us from being made ^{unnecessary} ~~being~~ polluted from these projects?
- ⑤ What is the purpose of the new buildings?
- ⑥ What are the upgrades that require the old buildings to be taken down?
- ⑦ We already live in a very noisy area. Sounds of drills, ^{pickhammers etc.} all day long, workers ^{truck & bulldozer} yelling at each other to communicate gives us a headache and causes us to loose sleep and our health to decline. Noise pollution causes people to want to move/re locate which many of us cannot afford to do. (When they were working on 4900 Sunset yrs ago I lost a lot of sleep) I have lived at 1426 N. Edgemont St. #19 for 22 yrs now with my son. I have kidney failure and am on dialysis.

...will anything be done to keep noise down?

RECEIVED
CITY OF LOS ANGELES
for OCT 25 2017

and I need our sleep and quiet for our health so that we can stay well.
Sincerely, Mariano Barth

1426 N. Edgemont St. #19
101 90027-5937