V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process for an Environmental Impact Report (EIR) under the California Environmental Quality Act (CEQA). California Public Resources Code (PRC) Section 21002 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. If specific economic, social, or other conditions make infeasible or undesirable such alternatives, individual projects may be approved in spite of one or more significant effects. In addition, California PRC Section 21002.1(a) states, in part, that the purpose of an EIR is to identify the significant effects of a project on the environment, identify alternatives to the project, and indicate the manner in which those significant effects can be mitigated or avoided.

Direction regarding the consideration and discussion of project alternatives in an EIR is provided in State CEQA Guidelines Section 15126.6(a), as follows:

> An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible.

The State CEQA Guidelines indicate that the selection of project alternatives should be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The State CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible. State CEQA Guidelines Section 15126.6(f)(1) states that:

> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of

> infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries … and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

Beyond these factors, State CEQA Guidelines Section 15126.6(e) requires the analysis of a "no project" alternative, and State CEQA Guidelines Section 15126.6(f)(2) requires an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.

a) Project Objectives

CEQA Guidelines Section 15124(b) states that the project description shall contain "a statement of the objectives sought by the proposed project." Section 15124(b) of the CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project." The underlying purpose of the Project is to provide health care services to residents of Los Angeles and surrounding areas. As set forth in the CEQA Guidelines, the Project's basic and fundamental objectives are provided below.

1. Replace existing, obsolete facilities with new, state-of-the-art medical care facilities that increase efficiency and capacity within the existing Medical Center campus, allowing for the reallocation of employed health care professionals from several functionally deficient MOBs [medical office buildings] to more conveniently serve community residents within a regional healthcare hub.

2. Expand the Medical Center campus through the construction and operation of additional new medical facilities, providing long-range health care capacity and flexibility to accommodate future growth and the changing needs of the regional population.

3. Create employment opportunities for careers in health care, including more than 800 new employment opportunities in various medical professions and through the expansion and operation of a teaching hospital.

4. Redesign the existing campus to improve the safety and efficiency of internal circulation of vehicles and pedestrians, and the functionality and accessibility of all facilities and services, including parking.

5. Promote public transit and reduce reliance on vehicular transportation by siting a range of outpatient care services, such as cardiology, radiology, neurology, pulmonary, and other services, on one campus near a major transit station (i.e.,

the Metro B Line Vermont/Sunset Station) rather than at several off-campus locations, and incorporating pedestrian-friendly features (such as pocket parks and street furniture) into the overall Project design.

6. Implement green building features using the standards of the Green Guide for Healthcare, as such standards evolve over time, and achieve Leadership in Energy and Environmental Design (LEED) Gold certification or equivalent, as well as implement Kaiser Permanente's existing sustainable building strategies.

b) Significant and Unavoidable Project Impacts

Project impacts that would remain significant and unavoidable after mitigation include Project-specific and cumulative construction noise and vibration impacts, potentially resulting in structural damage and human annoyance.

2. Overview of Alternatives to the Project

As previously stated, the purpose of this section is to assess a range of reasonable alternatives to the Project that would feasibly attain most of the basic Project objectives and avoid or substantially lessen any of the potential significant effects of the Project, and to evaluate the comparative merits of the alternatives. The following alternatives to the Project have been selected for evaluation based on the significant environmental impacts of the Project, the objectives established for the Project, and the feasibility of the alternatives considered.

CEQA requires the alternatives analysis to include a "no project" alternative where the Project does not proceed. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project.[1] Pursuant to State CEQA Guidelines Section 15126.6(e)(2), requirements of the analysis of the "no project" alternative are as follows:

> The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published (Alternative 1), or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans, and consistent with available infrastructure and community services (Alternative 2).

[1] State California Environmental Quality Act (CEQA) Guidelines Section 15126.6(e)(1).

In addition to the two no project alternatives (Alternatives 1 and 2), two reduced project alternatives were considered (Alternatives 3 and 4). Alternatives 3 and 4 consider several modified components to address the significant and unavoidable construction noise impacts created by the Project, as well as other potentially significant impacts of the Project. The alternatives considered and analyzed are as follows:

Alternative 1: No Project/No Build

Alternative 2: Development Under Existing Zoning

Alternative 3: Reduced Intensity Alternative

Alternative 4: Reduced Intensity and Parking Alternative

A more detailed discussion of these alternatives and impacts that would occur under the alternatives is included below.

3. Alternatives Considered and Rejected

As set forth in State CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to State CEQA Guidelines Section 15126.6(c), among the factors that may be used to eliminate an alternative from detailed consideration is the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. In considering ways to substantially reduce or avoid the significant impacts identified for the Project, the following alternatives were considered but rejected for further review, due to the infeasibility of the alternative and/or the inability of the alternative to meet most of the basic Project's objectives or substantially reduce or avoid the Project's significant impact after mitigation.

a) Alternative Project Site

This alternative would place certain services and specialties the Project would provide in the existing Pasadena Medical Office Building, Romaine Medical Office Building, or future East Los Angeles Medical Office Building site. However, it was determined that these services and specialties benefit from being on the Project Site for the following reasons:

- They are procedure-based and benefit from adjacency to the Ambulatory Surgery Center and outpatient procedure center that form a part of the Project;
- They include hospital residency programs, which require on-site education, as well as inpatient rounding, which can be best provided at the Project Site; and
- Separating specialty departments among smaller sites is inefficient because it disrupts and impairs proper staffing, sufficient patient volume, and necessary equipment.

Additionally, development of the Project at another location would not be consistent with the purpose and objectives of the Project. By splitting the Project's services into separate sites and precluding the replacement of obsolete facilities with state-of-the-art equipment and technology in well-designed, highly functional, and aesthetically pleasing space, this alternative would not meet any of the following Project objectives: This alternative would not replace existing, obsolete facilities with new, state-of-the-art medical care facilities that increase efficiency and capacity within the existing Medical Center campus; expand the existing Medical Center campus through the construction and operation of additional new medical facilities; redesign the existing campus to improve the safety and efficiency of internal circulation of vehicles and pedestrians; or promote public transit and reduce reliance on vehicular transportation by siting a range of outpatient care services on one campus near a major transit station. For each of the foregoing reasons, this alternative was rejected from further consideration.

b) Reduced Noise and Vibration Project Alternative

Several strategies were considered for a reduced noise and vibration project alternative to eliminate the significant and unavoidable construction noise and vibration impacts of the Project.

One strategy considered incorporating setbacks into the Project, which would distance construction activities away from sensitive receptors, and thus, avoid the noise and vibration impacts caused by the Project.

While incorporating the setbacks required to avoid noise impacts, the only components of the Project (that eliminate noise and vibration impacts during construction through setbacks) that could be developed, are the medical office buildings (MOBs) located on

Sites 3 and 4. As such, this alternative would not provide enough MOB, hospital addition, or commercial space to fully meet the Project objectives. This alternative would not include the construction of parking structures at the Project Site and would not allow for the provision of parking in appropriate locations and at a level that is sufficient to meet the needs of the patients, medical staff, and visitors in accordance with Citywide standards and community needs. For each of the foregoing reasons, this alternative was rejected from further consideration.

4. Analysis Format

In accordance with State CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the project. Furthermore, each alternative is evaluated to determine whether the Project Objectives, identified in Chapter III, Project Description, of this Draft EIR would be substantially attained by the alternative. The evaluation of each of the alternatives follows the process described below:

- A description of the alternative.

- The net environmental impacts of the alternative before and after implementation of feasible mitigation measures for each environmental issue area analyzed in the EIR are described. Where applicable, the evaluation is divided between temporary impacts that would occur during the Project's construction phase and impacts that would occur during the Project's operational phase.

- Post-mitigation and less-than-significant environmental impacts of the alternative and the Project are compared for each environmental topic area. Where the impact of the alternative would be clearly less than the impact of the Project, the comparative impact is said to be "less." Where the alternative's net impact would clearly be more than the Project, the comparative impact is said to be "greater." Where the impacts of the alternative and Project would be roughly equivalent, the comparative impact is said to be "similar." Where the impacts of the alternative would be the same as the Project, the comparative impact is said to be the "same." The evaluation also documents whether, as compared to the Project, an impact would be entirely avoided, whether a significant impact could be reduced to a less than significant level, or whether a significant unavoidable impact would be feasible to mitigate to a less than significant level.

- The comparative analysis of the impacts is followed by a general discussion of the extent to which the underlying purpose and Project Objectives are attained by the alternative.

At the end of the discussion of each alternative, a relative comparison of the alternative's impacts and consistency with Project Objectives is provided. Pursuant to State CEQA Guidelines Section 15126.6(e)(2) an "Environmentally Superior Alternative" is identified. Finally, **Table V-5**, provided in the Environmentally Superior Alternative section, compares the level of the Project's impacts to the level of each of the alternative's impacts, by environmental topic.

5. Alternatives Analysis

a) Alternative 1: No Project/No Build

(1) Description of the Alternative

CEQA requires the alternatives analysis to include a "no project" alternative where the Project does not proceed. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project.[2] Pursuant to State CEQA Guidelines Section 15126.6(e)(2), requirements for the analysis of the "no project" alternative are as follows:

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

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

- Site 1 would continue to support non-hospital uses not associated with Kaiser Permanente's current operations. The site contains four commercial structures along North Vermont Avenue and one residential duplex structure with a detached garage along North New Hampshire Avenue.
- Site 2 would continue to support a surface parking lot supporting Kaiser Permanente facilities.

[2] State CEQA Guidelines Section 15126.6(e)(1)

- Site 3 would continue to support a Kaiser Permanente MOB and a small surface parking area/parking structure.
- Site 4 would continue to support a Kaiser Permanente MOB.
- Site 5 would continue to support a two- to three-level parking structure with MOB space inside.
- Site 6 would continue to support surface parking and a single-level temporary construction trailer.

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

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

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

The No Project/No Build Alternative would minimize several less-than-significant or less-than-significant with mitigation impacts associated with the Project, as shown in Table V-5.

(2) Environmental Impact Analysis

(a) Air Quality

(i) Consistency with Air Quality Management Plan

Alternative 1 would continue existing Project Site conditions. Criteria air pollutant emissions under the existing conditions were quantified as the Project Site baseline and are provided in **Table IV.B-8** and **Table IV.B-9** of Section IV.B, Air Quality, of this Draft EIR (see Existing Baseline), and are also shown below in **Table V-1**.

TABLE V-1
EXISTING BASELINE – ESTIMATED DAILY MAXIMUM OPERATIONAL EMISSIONS (POUNDS/DAY)

Emissions Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Area	5.13	<0.01	0.21	<0.01	<0.01	<0.01
Energy	0.35	3.19	2.68	0.02	0.24	0.24
Mobile	20.77	92.86	287.99	0.75	54.61	15.29
Stationary	N/A	N/A	N/A	N/A	N/A	N/A
Total	**26.25**	**96.05**	**290.88**	**0.77**	**54.85**	**15.53**

TABLE V-1
EXISTING BASELINE – ESTIMATED DAILY MAXIMUM OPERATIONAL EMISSIONS (POUNDS/DAY)

Emissions Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Emissions Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**Yes**	**No**	**No**	**No**	**No**

SOURCE: See Appendix B-2 for complete results.
NOTES:
VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter.
The values shown are the maximum summer or winter daily emissions results from California Emissions Estimator Model (CalEEMod), though totals may not sum due to rounding.

These tables show, that under Project Site conditions, oxides of nitrogen (NO_x) emissions would exceed South Coast Air Quality Management District (SCAQMD) operational thresholds. However, Alternative 1 would result in no changes to the existing conditions, and therefore would not result in additional criteria air pollutant emissions. Alternative 1 would result in no impacts, which would be less than the Project's less-than-significant impacts.

(ii) Construction Emissions (Violation of Air Quality Standards and Cumulatively Considerable Impacts)

Since Alternative 1 would continue existing Project Site conditions, this Alternative would not generate any construction-related emissions. Alternative 1 would result in no impacts, which would be less than the Project's less-than-significant impacts.

(iii) Operational Emissions (Violation of Air Quality Standards and Cumulatively Considerable Impacts)

Alternative 1 would leave existing Project Site conditions unchanged and therefore would not introduce new criteria air pollutant emissions. Alternative 1 would result in no impacts, which would be less than the Project's less-than-significant impacts.

(iv) Sensitive Receptors

Alternative 1 would leave existing Project Site conditions unchanged and therefore would not introduce new criteria air pollutant or toxic air contaminant emissions. Alternative 1 would result in no impacts, which would be less than the Project's less-than-significant impacts.

(v) Odors

Alternative 1 would leave existing Project Site conditions unchanged. This alternative would not generate any construction-related odors or any new operational-related odors. Alternative 1 would result in no impacts, which would be less than the Project's less than significant impacts.

(b) Biological Resources

Alternative 1 would leave the existing Project Site conditions unchanged, and no new development would occur. As such, this alternative would result in no impact with respect to candidate, sensitive, or special-status species; riparian habitat; wetlands; migratory wildlife species; local policies and ordinances; and conservation plans. The Project would require the removal of trees, and therefore could impact migratory wildlife species. However, with implementation of Mitigation Measure **MM-BIO-1**, impacts would be less than significant. Alternative 1 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts with mitigation.

(c) Cultural Resources

(i) Historical Resources

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur. As discussed in Section IV.D of this Draft EIR, each of the six historically evaluated buildings proposed for demolition as part of the Project were determined ineligible for listing at the national, State, or local level, and are therefore, not historical resources under CEQA. Alternative 1 is located adjacent to the Aline Barnsdall Complex and Hollywood Presbyterian Medical Center. However, Alternative 1 would not impair the ability of either resource to convey their significance. As such, this alternative would also result in no direct or indirect impacts on historical resources. Alternative 1 would result in no impacts, which would be less than the Project's impact of less than significant.

(ii) Archaeological Resources

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur. As such, this alternative would result in no impact with respect to archaeological resources as there would no grading or earthwork activities. Alternative 1 would result in less-than-significant impacts, which would be less than the Project's impact of less-than-significant with mitigation.

(iii) Human Remains

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur as there would no grading or earthwork activities. Alternative 1 would result in no impacts, which would be less than the Project's impact of less-than-significant impacts.

(d) Geology and Soils

(i) Alquist-Priolo Earthquake Fault, Ground Shaking, Liquefaction, Settlement, Landslides

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur. Thus, this alternative would result in no impact associated with Alquist-Priolo earthquake faults, ground shaking, liquefaction, settlement, and landslides. Alternative 1 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(ii) Erosion/Loss of Topsoil

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur. Alternative 1 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(iii) Geologic Instability

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur. Alternative 1 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(iv) Expansive Soils

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur. Alternative 1 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(v) Septic Tanks

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur, and septic tanks are not currently used within the Project Site. Alternative 1 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(vi) Geologic Feature or Paleontological Resource

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur. Alternative 1 would result in less-than-significant impacts, which would be less than the Project's less-than-significant with mitigation impacts.

(e) Greenhouse Gas Emissions

(i) Applicable Plan or Policy

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur, and no additional construction greenhouse gas (GHG) emissions would occur at the Project Site. Alternative 1 would result in no impacts, which would be less than the Project's less-than-significant impacts.

(ii) Greenhouse Gas Emissions

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur, and no additional construction GHG emissions would occur at the Project Site. The existing uses would result in less emissions when compared to the Project as shown in Table IV.F-8 and IV.F-9 of Section IV.F, Greenhouse Gas Emissions, of this Draft EIR (see Existing Baseline). Alternative 1 would result in no impacts, which would be less than the Project's less-than-significant impacts.

(f) Hazards and Hazardous Materials

(i) Routine Transport, Use, or Disposal of Hazardous Materials

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur, including no demolition and no ground-disturbing activities. Therefore, mitigation related to polychlorinated biphenyl (PCB) waste characterization, segregation, disposal, and reuse, and the preparation of a hazardous substance management plan, would not be required, as it would for the Project. Alternative 1 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts with mitigation.

(ii) Upset Conditions Involving the Release of Hazardous Materials

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur, including no demolition and no ground-disturbing activities. Therefore, mitigation related to PCB waste characterization, segregation, disposal, and

reuse; the preparation of a hazardous substance management plan; vapor encroachment; and a soil management plan would not be required, as it would for the Project. Alternative 1 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts with mitigation.

(iii) Emit Hazardous Materials Near Schools

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur, including no demolition and no ground-disturbing activities. Therefore, mitigation related to PCB waste characterization, segregation, disposal, and reuse; the preparation of a hazardous substance management plan; vapor encroachment; and a soil management plan would not be required, as it would for the Project. Alternative 1 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts with mitigation.

(iv) Hazardous Materials Site

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur, including no demolition and no ground-disturbing activities. Therefore, mitigation related to PCB waste characterization, segregation, disposal, and reuse; the preparation of a hazardous substance management plan; vapor encroachment; and a soil management plan would not be required, as it would for the Project. Alternative 1 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts with mitigation.

(v) Emergency Response/Evacuation Plan

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur that would have the potential to interfere with an emergency response plan. Alternative 1 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(g) Hydrology and Water Quality

(i) Water Quality Standards

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur, including no demolition and no ground-disturbing activities. As such, Alternative 1 would result in no impact related to water quality standards. Alternative 1 would result in no impacts, which would be less than the Project's less-than-significant impacts with mitigation.

(ii) Groundwater

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur, and water demand would remain the same. As such, Alternative 1 would result in no impact related to groundwater. Alternative 1 would result in no impacts, which would be less than the Project's less-than-significant impact.

(iii) On-site Flooding

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur and would not result in an increase in impermeable surface area. As such, Alternative 1 would result in no impact related to on-site flooding. Alternative 1 would result in no impacts, which would be less than the Project's less-than-significant impact.

(iv) Sustainable Groundwater Management Plan

Alternative 1 would leave existing Project Site conditions unchanged; no new development would occur, and water demand would remain the same. As such, Alternative 1 would result in no impact related to a sustainable groundwater management plan. Alternative 1 would result in no impacts, which would be less than the Project's less-than-significant impact.

(h) Land Use and Planning

(i) Land Use Plan Consistency

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur; therefore, Alternative 1 would not conflict with an applicable land use plan. As such, Alternative 1 would result in no impact related to land use plan consistency. In comparison, the Project would be compatible with the commercial, single-family residential, and multifamily residential uses surrounding the Project Site, although it would be developed more intensively. Alternative 1 would result in less-than-significant impacts, which would be similar to the Project, which would result in less-than-significant impacts.

(i) Noise

(i) Noise in Excess of Standards

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur; therefore, no demolition or construction would occur. As such, Alternative 1 would result in no impact related to noise in excess of standards. Alternative 1 would result in no impacts, which would be less than the Project, which would result in significant and unavoidable impacts.

(ii) Excessive Groundborne Vibration or Noise

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur; therefore, no construction would occur. As such, Alternative 1 would result in no impact related to an excessive groundborne vibration or noise. Alternative 1 would result in no impacts, which would be less than the Project, which would result in significant and unavoidable impacts.

(j) Population and Housing

(i) Population Growth

Alternative 1 would leave existing Project Site conditions unchanged, and no new land uses would be developed. Therefore, no residential population would be added to the Project Site. In comparison, the Project would generate 1,807 new employees to the area and therefore, would contribute to growth to the area. However, as shown in Section IV.K of the Draft EIR, the Project's employment growth would fall within the forecasted growth for the City, and the Project would not represent a substantial or significant growth as compared to projected growth for the City. Alternative 1 would result in no impact, which would be less than the less-than-significant impact related to population and housing under the Project.

(k) Public Services

(i) Fire Protection Services

Alternative 1 would leave existing Project Site conditions unchanged, and no new land uses would be developed. There would be no increase in the need for fire protection services at the Project Site. Alternative 1 would result in no impact, which would be less than the less-than-significant impact related to fire protection services under the Project.

(ii) Police Protection Services

Alternative 1 would leave existing Project Site conditions unchanged, and no new land uses would be developed. There would be no increase in the need for police protection services at the Project Site. Alternative 1 would result in no impact, which would be less than the less-than-significant impact related to police protection services under the Project.

(iii) Schools

Alternative 1 would leave existing Project Site conditions unchanged and no new land uses would be developed. Therefore, this alternative would not create an additional need

for schools. Alternative 1 would result in no impact, which would be less than the Project's less-than-significant impact related to schools.

(iv) Parks and Recreation

Alternative 1 would leave existing Project Site conditions unchanged, and no new land uses would be developed. Therefore, this alternative would not create an additional need for parks and recreational facilities. Alternative 1 would result in no impact, which would be less than the less-than-significant impact related to parks and recreation under the Project.

(v) Library Services

Alternative 1 would leave existing Project Site conditions unchanged, and no new land uses would be developed. Therefore, the alternative would not create an additional need for library services. Alternative 1 would result in no impact, which would be less than the less-than-significant impact related to library service under the Project.

(l) Transportation

(i) Applicable Circulation Program

Alternative 1 would leave existing Project Site conditions unchanged, and no new land uses would be developed. This alternative would not thus generate any new traffic trips. As such, this alternative would not conflict with an applicable congestion management program. Alternative 1 would result in no impacts, which would be less than the Project, which would result in less-than-significant impacts.

(ii) Vehicle Miles Traveled

Alternative 1 would leave existing Project Site conditions unchanged, and no new land uses would be developed. Therefore, this alternative would not generate any new traffic trips. As such, this alternative would not result in vehicle miles traveled (VMT) impacts. Alternative 1 would result in no impacts, which would be less than the Project, which would result in less-than-significant impacts.

(iii) Traffic Hazards

Alternative 1 would leave existing Project Site conditions unchanged, and no new land uses would be developed. Therefore, this alternative would not result in traffic hazards. Alternative 1 would result in no impacts, which would be less than the Project, which would result in less-than-significant impacts.

(iv) Inadequate Emergency Access

Alternative 1 would leave existing Project Site conditions unchanged, and no new land uses would be developed. As such, this alternative would not result in emergency access impacts. Alternative 1 would result in no impacts, which would be less than the Project, which would result in less-than-significant impacts.

(m) Tribal Cultural Resources

Alternative 1 would leave existing Project Site conditions unchanged, and no new development would occur, as there would no grading or earthwork activities. As such, Alternative A would result in no impact with respect to tribal cultural resources. Alternative 1 would result in no impacts, which would be less than the Project, which would result in less-than-significant impacts.

(n) Utilities and Service Systems

(i) Water

Alternative 1 would leave existing Project Site conditions unchanged. Since no new development would occur, no additional water would be consumed. As such, this alternative would result in no impact.

The Project would not require or result in the construction of new off-site stormwater drainage facilities, or the expansion of off-site existing facilities. Alternative 1 would result in no impacts, which would be less than the Project, which would result in less-than-significant impacts.

(ii) Wastewater

Alternative 1 would leave existing Project Site conditions unchanged. Since no new development would occur, no additional wastewater would be generated. As such, this alternative would result in no impact.

The Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Alternative 1 would result in no impacts, which would be less than the Project, which would result in less-than-significant impacts.

(iii) Solid Waste

Since Alternative 1 would leave existing Project Site conditions unchanged, no additional solid waste would be generated. As such, this alternative would result in no impact.

Alternative 1 would result in no impacts, which would be less than the Project, which would result in less-than-significant impacts.

(iv) Expanded Electric Power, Natural Gas, or Telecommunications Facilities

Since Alternative 1 would leave existing Project Site conditions unchanged, expanded utilities would not be required. Alternative 1 would result in no impacts, which would be less than the Project, which would result in less-than-significant impacts.

(o) Energy Consumption and Conservation

Since Alternative 1 would leave existing Project Site conditions unchanged, no additional energy would be consumed. Alternative 1 would result in no impacts, which would be less than the Project, which would result in less-than-significant impacts.

(3) Comparison of Impacts

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

(4) Relationship of Alternative 1 to Project Objectives

Since no project would be built, Alternative 1 would not meet any of the Project objectives.

b) Alternative 2: Development Under Existing Zoning

(1) Description of the Alternative

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

Table V-2A provides a description of the zoning and land use designations and the Alternative 2 buildout scenario; **Table V-2B** provides a description of the Project for comparison. Alternative 2 considers a medium buildout scenario with land uses consistent with the underlying Vermont/Western Station Neighborhood Area Plan (SNAP) Specific Plan Subarea designations and requirements, or zoning designations and requirements for Sites which are not located within the existing SNAP boundaries; and would result in

floor area ratios (FARs) that are less than the FAR proposed for each of the building sites associated with the Project.

Alternative 2 would provide a total of 1,148 automobile parking spaces, which would meet the minimum parking requirements for Hospitals and Medical Uses provided for in SNAP Section 9.E.4.(i),[3] and Los Angeles Municipal Code Sections 12.21.A.4.(d)(1),[4] and 12.21.A.4.(x)(3)6.[5] This would be 758 fewer automobile parking spaces than the proposed Project's parking of 1,906 new automobile spaces.

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

Site 1

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

Site 2

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

Site 3

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

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

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

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

Site 4

- No change from the Project, Option B

Site 5

- No development to occur

Site 6

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

TABLE V-2A
ALTERNATIVE 2 BUILDOUT SCENARIO

Existing Project Site and Size	Proposed Project Buildout	Alternative 2 Buildout	Zoning and Land Use	Buildout Constraints
Site 1 1345 North Vermont Avenue; 45,700 square feet	• MOB (130,000 square feet) and parking structure (302,800 square feet) • 129 feet in height (13 levels—9 above grade, 4 below grade)	• 102,826 square feet of MOB (proposed FAR 2.25:1) • 100 feet in height (10 levels)	Western (approx. 1/7 of the overall site): R4-1; Community Commercial; Vermont/Western SNAP - Subarea C	Maximum FAR: 3.0:1 (4.5:1 for hospitals and medical use only) Building Height Maximum: 100 feet (200 feet for hospitals and medical use only)
			Eastern (approx. 6/7 of the overall site): C2-CSA1; Community Commercial; Vermont/Western SNAP – Subarea C	Maximum FAR: 3.0:1 (4.5:1 for hospitals and medical use only) Building Height Maximum: 100 feet (200 feet for hospitals and medical use only)

TABLE V-2A
ALTERNATIVE 2 BUILDOUT SCENARIO

Existing Project Site and Size	Proposed Project Buildout	Alternative 2 Buildout	Zoning and Land Use	Buildout Constraints
Site 2 4760 Sunset Boulevard; 34,582 square feet	• 50,000-square-foot Procedure Center addition to an existing MOB at 4760 Sunset Boulevard (for a total of 113,383 square feet medical office space at this property); 6 parking stalls • 80 feet in height (4 levels)	• 46,686 square feet of hospital use and 20,749 square feet of parking • 80 feet in height (4 levels)	Northern (approx. 3/5 of the overall site): C2-CSA1; Community Commercial; Vermont/Western SNAP - Subarea C Southern (approx. 2/5 of the overall site): PB-1; Vermont/Western SNAP - Subarea C	Maximum FAR: 3.0:1 (4.5:1 for hospitals and medical use only) Building Height Maximum: 100 feet (200 feet for hospitals and medical use only) Maximum FAR: 3.0:1 (4.5:1 for hospitals and medical use only) Building Height Maximum: 100 feet (200 feet for hospitals and medical use only)
Site 3 1505 North Edgemont Street; 24,964 square feet	Option A • 41,500-square-foot MOB • 70 feet in height (3 levels) Option B • 73,500-square-foot MOB • 90 feet in height (5 levels)	• 37,446 square feet of surface and below grade parking structure • 70 feet in height (3 levels)	C2-CSA1; Community Commercial; Vermont/Western SNAP - Subarea C	Maximum FAR: 3.0:1 (4.5:1 for hospitals and medical use only) Building Height Maximum: 100 feet (200 feet for hospitals and medical use only)
Site 4 1526 North Edgemont Street; 123,588 square feet	Option A • 177,300-square-foot MOB • 105 feet in height (6 levels, with 5 above grade, 1 below grade)	No change from the Project, Option B	Northern (approx. 1/14 of the overall site): RD1.5-1XL; Vermont/Western SNAP - Subarea C	Maximum FAR: 3.0:1 (4.5:1 for hospitals and medical use only) Building Height Maximum: 100 feet (200 feet for hospitals and medical use only)

TABLE V-2A
ALTERNATIVE 2 BUILDOUT SCENARIO

Existing Project Site and Size	Proposed Project Buildout	Alternative 2 Buildout	Zoning and Land Use	Buildout Constraints
	Option B • 177,300-square-foot, 105-bed hospital addition and bridge connections to existing hospital • 105 feet in height (6 levels, with 5 above grade, 1 below grade)		Southern (approx. 13/14 of the overall site): C2-CSA1; Community Commercial; Vermont/Western SNAP - Subarea C	Maximum FAR: 3.0:1 (4.5:1 for hospitals and medical use only) Building Height Maximum: 100 feet (200 feet for hospitals and medical use only)
Site 5 1517 North Vermont Avenue; 25,582 square feet	• 230,600-square-foot parking structure with 578 parking spaces • 2,300 square feet of ground floor retail/ commercial space • 105 feet in height (10 levels, with 8 above grade, 2 below grade)	No development	C2-CSA1; Community Commercial; Vermont/Western SNAP - Subarea C	Maximum FAR: 3.0:1 (4.5:1 for hospitals and medical use only) Building Height Maximum: 100 feet (200 feet for hospitals and medical use only)
Site 6 4950 West Sunset Boulevard; 24,964 square feet	• 241-stall parking structure addition to the 4950 West Sunset Boulevard parking structure (122,400 square feet) • 90 feet in height (9 levels)	• Parking structure addition to the 4950 West Sunset Boulevard parking structure (82,400 square feet) • 60 feet in height (6 levels)	Northern (approx. 1/18 of the overall site): C2-CSA1; Community Commercial; Vermont/Western SNAP - Subarea C Southern (approximately 17/ 18 of the overall site): RD2-1XL; Low Medium II Residential	Maximum FAR: 3.0:1 (4.5:1 for hospitals and medical use only) Building Height Maximum: 100 feet (200 feet for hospitals and medical use only) Maximum FAR: 3.0:1 Building Height Maximum: 30 feet

NOTES: MOB = medical office building; FAR = floor area ratio.

TABLE V-2B
ALTERNATIVE 2 AND PROJECT BUILDOUT SCENARIO COMPARISON

Land Use	Project Option A Buildout (square feet)	Project Option B Buildout (square feet)	Alternative 2 Buildout (square feet)
Medical Use – Hospital Use	50,000	227,300	223,986
Medical Use – MOB	462,183	316,883	102,826
Commercial	2,300	2,300	0
Parking	655,800	655,800	140,595
Total Development (without Parking)	**514,483**	**546,483**	**326,812**

NOTES: MOB = medical office building.

While less intensive in development, Alternative 2 would not completely avoid the significant and unavoidable noise and vibration impacts associated with the Project, because noise and vibration would still result from the use of heavy construction equipment. Alternative 2 would reduce less-than-significant or less-than-significant with mitigation impacts associated with the Project, as shown in Table V-5.

(2) Environmental Impact Analysis

(a) Air Quality

(i) Consistency with Air Quality Management Plan

As shown in Table V-2B, Alternative 2 would result in less development as compared to the Project (a reduction in 185,371 square feet of medical space, a reduction in 140,595 square feet of parking, and no commercial space). Because there would be less development when compared to the Project, Alternative 2 would generate less operational mobile trips, because less space would be available to accommodate employees, patients, and visitors. As shown in **Table IV.B–9** through **Table IV.B-13**, in Section IV.B, Air Quality, of this Draft EIR, the Project would result in criteria air pollutant emissions below SCAQMD thresholds. Therefore, Alternative 2 would not exceed the SCAQMD significance threshold for criteria air pollutant emissions, because the Alternative would result in less emissions when compared to the Project. Alternative 2

would not result in an impact related to an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the 2016 Air Quality Management Plan (AQMP). Alternative 2 would result in less-than-significant impacts, which would be less than the Project's less than significant impacts.

(ii) Construction Emissions

Alternative 2 would result in less development as compared to the Project (a reduction in 185,371 square feet of medical space, a reduction in 140,595 square feet of parking, and no commercial space). Therefore, Alternative 2 would require less construction activity when compared to the Project. Daily construction emissions of the Project would not exceed the SCAQMD significance thresholds for volatile organic compounds (VOC), oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), coarse particulate matter (PM_{10}), or fine particulate matter ($PM_{2.5}$) during construction in all construction years and would result in a less-than-significant impact. Alternative 2 would result in less-than-significant impacts, which would be less than the Project's less than significant impacts.

(iii) Operational Emissions

Alternative 2 would result in less development as compared to the Project (a reduction in 185,371 square feet of medical space, a reduction in 140,595 square feet of parking, and no commercial space). Because there would be less development when compared to the Project, Alternative 2 would generate less operational mobile trips, because less space would be available to accommodate employees, patients, and visitors. Additionally, Alternative 2 would require less construction activity when compared to the Project. As shown in Table IV.B–12 and Table IV.B-13, in Section IV.B, Air Quality, the Project would result in criteria air pollutant emissions below SCAQMD thresholds. Similar to the Project, Alternative 2 would not exceed the SCAQMD significance threshold for criteria air pollutant emissions. Therefore, Alternative 2 would not result in an impact related to an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the 2016 AQMP. Alternative 2 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(iv) Sensitive Receptors

Alternative 2 would result in less development as compared to the Project (a reduction in 185,371 square feet of medical space, a reduction in 140,595 square feet of parking, and no commercial space). Because there would be less development when compared to the Project, Alternative 2 would generate less operational mobile trips and thus

would result in less localized impacts to sensitive receptors, because less space would be available to accommodate employees, patients, and visitors. Additionally, Alternative 2 would require less construction activity when compared to the Project. Therefore, similar to the Project (as shown in **Table IV.B-14** through **Table IV.B-16** in Section IV.B of this Draft EIR), it is likely that Alternative 2 would result in less-than-significant impacts. Alternative 2 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(v) Odors

Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and to architectural coatings. Such odors would cease upon completion of construction. Land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(b) Biological Resources

The Project area is largely urbanized and does not support special-status species, riparian habitat, or sensitive natural communities, and no bodies of water or wetlands exist on the Project Site. The Project Site does support a number of trees, the removal of which could result in cumulative impacts to migratory bird species. However, as the project areas for both the Project and Alternative 2 are similar, Alternative 2 would comply with the Migratory Bird Treaty Act and Mitigation Measure **MM-BIO-1**, and as such, impacts related to migratory and nesting birds would be less than significant. Alternative 2 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(c) Cultural Resources

(i) Historical Resources

Alternative 2 would result in less development as compared to the Project (a reduction in 185,371 square feet of medical space, a reduction in 140,595 square feet of parking, and no commercial space). Each of the six evaluated buildings proposed for demolition as part of the Project (1526 North Edgemont Street; 1517 North Vermont Avenue; 1505 North Vermont Avenue; 1321 North Vermont Avenue; 1345 North Vermont Avenue; and 1328 North New Hampshire Avenue) were determined ineligible for listing at the national, State, or local level, and they may not be considered historical resources under CEQA. Alternative 2 is located adjacent to the Aline Barnsdall Complex and Hollywood

Presbyterian Medical Center; however, this would not impair the ability of either resource to convey their significance. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(ii) Archaeological Resources

The results of the archaeological record search from 2018 for the Project Site, which is the same site as the Alternative 2 site, indicate that there are no previously identified archaeological resources within the individual Building Sites and no archaeological resources within a 0.25-mile radius of Project Site. However, the potential exists for unknown archaeological resources to be inadvertently unearthed during earth-moving activities associated with construction of Alternative 2. As with the Project, in the unexpected event that Alternative 2 construction activities unearth intact cultural or archaeological materials, a potentially significant impact could result, and as such, additional mitigation would be required. Mitigation Measure **MM-CUL-1** requires that all construction work occurring within 100 feet of the find is immediately stopped until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology can evaluate the significance of the find. Alternative 2 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(iii) Human Remains

No prehistoric or historic burials were identified within the Project and Alternative 2 area as a result of the records search. Alternative 2 would not disturb any human remains, including those interred outside of dedicated cemeteries. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(d) Geology and Soils

(i) Alquist-Priolo Earthquake Fault, Ground Shaking, Liquefaction, Settlement, Landslides

Southern California is an active seismic region. Although the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, the Project Site would be susceptible to ground shaking during a seismic event. The main seismic hazard affecting the Project Site is moderate to strong ground shaking. However, Kaiser Permanente would be required to design and construct Alternative 2 in conformance with the most recently adopted California Building Code design parameters, and City Building Codes, with respect to new construction.

Adherence to building codes and engineering practices would ensure that Alternative 2 would not expose people, property, or infrastructure to seismically-induced ground-shaking hazards that are greater than the average risk associated with locations in the Southern California region. Alternative 2 would not result in additional ground-shaking impacts.

Additionally, the potential for liquefaction and associated lateral spreading beneath the Project Site is considered to be low. Because none of the building sites in these Hillside Areas are located in City-designated landslide hazard zones, Alternative 2 would not result in landslide impacts. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(ii) Erosion/Loss of Topsoil

Through compliance with existing regulations and implementation of best management practices (BMPs), Alternative 2 would be built in three phases. Select properties would remain vacant and unpaved following demolition, but prior to new construction. Specifically, such a scenario would occur at Site 3 (1505 North Edgemont Street) and Site 4 (1526 North Edgemont Street). Exposure of soils for extended periods of time could result in substantial erosion and loss of topsoil. However, implementation of the alternative would require erosion control measures and preparation of a Stormwater Pollution Prevention Plan (SWPPP). Additionally, during operations, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drain features, resulting in no contact with bare soil surfaces. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(iii) Geologic Instability

The Project Site is not susceptible to landslides, lateral spreading, or liquefaction; therefore, similar to the Project, Alternative 2 construction would not increase the potential for these types of geologic phenomena to occur. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(iv) Expansive Soils

Based on geotechnical reports completed for the Project Site, on-site soils locally possess a medium to high expansion potential. However, Alternative 2 would be designed and constructed in conformance with the City's current Building Code requirements, which include either over-excavation of expansion-prone soils and replacement with sandy, non-expansive soils or design of a foundation system that is strong and rigid enough to withstand the anticipated soil movement. Thus, Alternative 2 would not create a

substantial risk to individuals and/or property. In addition, Alternative 2 would not impact existing expansive soil conditions, as construction would not result in alternating wetting and drying of sediments. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(v) Septic Tanks

Alternative 2 would not require and likely would not have septic tanks or other alternative wastewater disposal systems. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(vi) Geologic or Topographic Feature or Paleontological Resources

In the event that intact paleontological resources are located on the Project Site, ground-disturbing activities associated with construction of Alternative 2, such as grading during site preparation, have the potential to destroy a unique paleontological resource or site. Without mitigation, the potential damage to paleontological resources during construction would be a potentially significant impact. Mitigation Measure **MM-GEO-1** requires that a paleontological monitor be present during all rough grading and other significant ground-disturbing activities in depths greater than 5 feet below ground surface. Alternative 2 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(e) Greenhouse Gas Emissions

(i) Applicable Plan or Policy

Alternative 2 would be subject to the same regulatory requirements and plans as the Project. Therefore, Alternative 2 would also consider project design features and renewable energy sources similar to the Project. As recommended by the California Air Resources Board Scoping Plan, Alternative 2 would use "green building" features as a framework for achieving GHG emissions reductions as new buildings would be designed to achieve LEED Gold or equivalent. Because Alternative 2 is located next to public transit, Alternative 2 would result in less VMT as compared to a standard project. Alternative 2 would comply with the City's Green New Deal, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence, all elements that Alternative 2 would have. Alternative 2 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(ii) Greenhouse Gas Emissions

Alternative 2 would result in less development as compared to the Project (a reduction in 185,371 square feet of medical space, a reduction in 140,595 square feet of parking, and no commercial space). Because there would be less development when compared to the Project, Alternative 2 would generate less operational mobile trips, because less space would be available to accommodate employees, patients, and visitors. As shown in Table IV.F-8 and Table IV.F-9 of Section IV.F, Greenhouse Gas Emissions, of the Draft EIR, the Project (Option A or Option B) would result in an insignificant incremental increase in GHG emissions relative to the existing condition. Alternative 2 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(f) Hazards and Hazardous Materials

(i) Routine Transport, Use, or Disposal of Hazardous Materials

As with the Project, Alternative 2 would result in development, including demolition and ground-disturbing activities that could cause significant impacts involving the routine transport, use, or disposal of hazardous materials. Therefore, mitigation related to PCB waste characterization, segregation, disposal, and reuse, and the preparation of a hazardous substance management plan would also be required for Alternative 2, identified as Mitigation Measures **MM-HAZ-1 and MM-HAZ-2** for the Project. Alternative 2 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(ii) Upset Conditions Involving the Release of Hazardous Materials

As with the Project, Alternative 2 would result in development, including demolition and ground-disturbing activities that could cause significant impacts regarding upset conditions involving the release of hazardous materials. Alternative 2 would result in development, including demolition and ground-disturbing activities. Therefore, mitigation related to PCB waste characterization, segregation, disposal, and reuse; the preparation of a hazardous substance management plan; vapor encroachment; and a soil management plan would be required, identified as Mitigation Measures **MM-HAZ-1, MM-HAZ-2, MM-HAZ-3, and MM-HAZ-4** for the Project. Alternative 2 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(iii) Emit Hazardous Materials Near Schools

The Project Site is located within 0.25 miles 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.

Alternative 2 would result in development, including demolition and ground-disturbing activities that could cause significant impacts involving emitting hazardous materials near schools. Therefore, mitigation related to PCB waste characterization, segregation, disposal, and reuse; the preparation of a hazardous substance management plan; vapor encroachment; and a soil management plan would be required, identified as Mitigation Measures **MM-HAZ-1, MM-HAZ-2, MM-HAZ-3, and MM-HAZ-4** for the Project. Alternative 2 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(iv) Hazardous Materials Site

As discussed in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, a Phase I Environmental Site Assessment was prepared for Site 1 in March 2016 (Appendix F-1), which included a regulatory database search from EDR. Further investigations of Site 1 revealed construction on Site 1 could result in vapor intrusion. Alternative 2 would result in development, including demolition and ground-disturbing activities on Site 1. Therefore, mitigation related to vapor encroachment and a soil management plan would be required, identified as Mitigation Measures **MM-HAZ-3, and MM-HAZ-4** for the Project. Alternative 2 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less than significant with mitigation impacts.

(v) Emergency Response/Evacuation Plan

Alternative 2 would result in development and may involve changes to existing access. Similar to the Project, the proposed site plan for Alternative 2, including the access driveway, would be reviewed and approved by the Los Angeles Fire Department (LAFD) during plan check review. Adherence to these requirements would ensure that adequate emergency access is provided and that Alternative 2 would not thus impair implementation of or physically interfere with the selected disaster routes pursuant to the Safety Element of the City's General Plan. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(g) Hydrology and Water Quality

(i) Water Quality Standards

Similar to the Project, Alternative 2 would include demolition and construction activities that have the potential to adversely affect the quality of stormwater runoff through increases in turbidity, sedimentation, and construction-related pollutants. However, the implementation of BMPs would reduce impacts associated with erosion-induced siltation of downstream drainages and incidental spills of petroleum products. These BMPs could include silt fences, stockpile containment, runoff control devices, tracking controls, and prevention of fluid leaks from construction vehicles.

Land uses associated with Alternative 2 that could contribute pollutants to stormwater runoff in the long term include uncovered parking areas (through small fuel and/or fluid leaks), uncovered refuse storage/management areas, landscape/open space areas (if pesticides/herbicides and fertilizers are improperly applied), and general litter/debris (e.g., generated during facility loading/unloading activities). In addition, there is the potential for lead, asbestos, and medical wastes to be generated, stored and/or handled on site. To the extent these wastes are stored in areas exposed to stormwater runoff, there could be water quality impacts as a result. Similar to the Project, implementation of a Hazardous Substance Management, Handling, Storage, Disposal, and Emergency Response Plan through mitigation would ensure such wastes are not exposed to stormwater runoff. Alternative 2 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impact with mitigation.

(ii) Groundwater

The Alternative 2 sites are mostly impervious surfaces; therefore, construction and operation of Alternative 2 is not expected to negatively affect groundwater recharge in the area, or the general direction and velocity of groundwater movement within the underlying groundwater table. For sites left temporarily undeveloped with disturbed soil during the phased Project construction, the SWPPP would require that BMPs be sufficient to temporarily stabilize the site to prevent sediment or other contaminants from leaving the site. These BMPs could include fiber rolls, silt fencing, grading, and perimeter controls to prevent any disturbed soil from leaving the vacant site. Construction and implementation of Alternative 2 would not impact the validity or effectiveness of past, current, or future investigation and/or remediation efforts at the leaking underground storage tank cleanup site.

Alternative 2 does not include direct extraction of groundwater during construction or operation, and no direct adverse impacts to groundwater are expected to occur. Alternative 2's water demand would be less than the Project, because Alternative 2 would result in less development than the Project. Alternative 2's water demand would

be consistent with the land use and water demand assumptions contained in the Los Angeles Department of Water and Power's (LADWP's) Urban Water Management Plan(UWMP) .[6] As such, Alternative 2 would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that this alternative would impede sustainable groundwater basin management of the basin. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(iii) On-Site Flooding

Alternative 2 would not result in an increase in impermeable surface areas, and therefore no increases in stormwater runoff are expected for Alternative 2. The City's Low-Impact Development Ordinance mandates stormwater management practices intended to encourage stormwater capture, infiltration, and reuse. Alternative 2 would be required to control runoff volume and rates emanating from the Project Site by (1) minimizing the impervious surface area and implementing source control measures, (2) controlling runoff from impervious surfaces using structural BMPs (e.g., infiltration, bioretention, and/or rainfall harvest and re-use), and (3) ensuring all structural BMPs are monitored and maintained for the life of Alternative 2. These BMPs would prevent a substantial increase in the rate or amount of surface runoff in a manner that would result in on- or off-site flooding. As a result, impacts would be less than significant. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less than significant impact.

(iv) Sustainable Groundwater Management Plan

Through compliance with Regional Water Quality Control Board requirements and a National Pollutant Discharge Elimination System permit, and implementation of a SWPPP (construction phase) and Standard Urban Stormwater Management Plan (operational phase), Alternative 2 would not conflict with or obstruct implementation of the Los Angeles Basin Water Quality Control Plan (Basin Plan). Alternative 2 is not expected to violate any water quality standards and measures would be taken both during construction and throughout operation to prevent potential contaminants from leaving the site by runoff. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

[6] Los Angeles Department of Water and Power (LADWP), 2015 Urban Water Management Plan, April 2016.

(h) Land Use and Planning

(i) Land Use Plan Consistency

Discretionary approvals requested by Alternative 2 include a Project Permit Compliance Review, Site Plan Review, Vesting Tentative Tract Map, Development Agreement, and associated construction permits and other entitlements. The Project Site is highly urbanized and developed. The Project Site is surrounded by a mixture of medical uses, commercial uses, park space, and residences. The Project Site is surrounded by existing Kaiser Permanente buildings, Hollywood Presbyterian Medical Center, and Children's Hospital Los Angeles. Development of the Project Site with medical uses and parking uses would be consistent with the surrounding uses.

Alternative 2 would develop the surrounding community by replacing inefficient and aging facilities. In addition, by providing additional healthcare services and employment in close proximity to transit, Alternative 2 would assist the City in achieving short- and long-term planning goals and objectives related to reducing urban sprawl, efficiently utilizing existing infrastructure, reducing regional congestion, and improving air quality through the reduction of VMT. This is consistent with Southern California Association of Governments (SCAG) and City zoning, plans and policies for promoting more intense land uses adjacent to transit stations and job centers. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(i) Noise

(i) Noise in Excess of Standards

Alternative 2 would result in less development as compared to the Project (a reduction in 185,371 square feet of medical space, a reduction in 140,595 square feet of parking, and no commercial space). Although Alternative 2 would involve less development when compared to the Project, construction would occur on all Project Sites, except Site 5, and would still require the use of heavy construction equipment that would be proximate to sensitive receptors. Therefore, Alternative 2 construction noise levels would exceed the applicable significance thresholds for construction in the L.A. CEQA Thresholds Guide for building sites other than Site 5 (i.e., construction activities lasting more than 10 days in a 3-month period would exceed existing ambient exterior noise levels by 5 A-weighted decibels or more at a noise-sensitive use). The temporary noise levels from construction would represent a substantial increase above existing ambient levels, and no measures exist that could feasibly reduce the temporary increase in construction noise to a level of less than significant. Project operations would include noise from emergency vehicles, vehicles within the parking structures, stationary equipment, and off-site nearby traffic. All of these noise sources would result in less-than-significant impacts, with the exception of

stationary equipment. However, the City's code requirements would ensure that stationary equipment complies with applicable noise standards and would not result in a substantial noise increase. Alternative 2 would result in significant and unavoidable impacts, which would be less than the Project's significant and unavoidable impacts.

(ii) Excessive Groundborne Vibration

Alternative 2 would result in less development as compared to the Project (a reduction in 185,371 square feet of medical space, a reduction in 140,595 square feet of parking, and no proposed commercial space). Although Alternative 2 would involve less development when compared to the Project, construction would occur on all Project Sites, except Site 5, and would still require the use of heavy construction equipment that would be proximate to sensitive receptors. Alternative 2 construction is estimated to result in vibration levels in excess of Federal Transit Administration (FTA) criteria for human annoyance at nearby residences located within approximately 25 feet of conventional construction activities (i.e., at Sites 1, 2, and 6). Construction is estimated to result in vibration levels in excess of FTA criteria for potential building damage at the residences located nearest to Sites 1 and 6. As with the Project, these vibration impacts from construction activities are significant and unavoidable since no feasible measure to mitigate these impacts to less than significant exists.

The primary anticipated source of vibration from operation of Alternative 2 would be on-site and off-site vehicular trips. Passenger vehicle trips are unlikely to result in perceptible or structural damage-inducing vibration levels at nearby uses, because passenger vehicles are relatively light in weight and use pneumatic rubber tires, typically resulting in negligible levels of vibration.[7] Similarly, vibration from delivery trucks would be unlikely to cause significant levels of vibration. Mechanical equipment would be isolated from the ground by virtue of being located at rooftop levels and (typically) would include vibration-absorbing mounts. Therefore, the potential for groundborne vibration during Project operation would be less than significant.

Alternative 2 would result in significant and unavoidable impacts during its construction phase, which would be less than the Project's significant and unavoidable impacts.

(j) Population and Housing

(i) Population Growth

Alternative 2 would result in less development as compared to the Project (a reduction in 185,371 square feet of medical space, a reduction in 140,595 square feet of parking, and no commercial space). Alternative 2 would result in less growth than the Project, because

[7] Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, May 2006.

Alternative 2 would have less capacity for employees as compared to the Project. Similar to the Project, Alternative 2's employment growth would fall within the forecasted growth for the City and the Project would not represent a substantial or significant growth as compared to projected growth for the City. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less than significant impact.

(k) Public Services

(i) Fire Protection Services

Alternative 2 would be subject to the requirements of the Los Angeles Fire Code, including Los Angeles Municipal Code (LAMC) Section 57,09.07A, which mandates the installation of automatic fire sprinkler systems if a project is located at a distance that exceeds the LAFD-required response time. Furthermore, Alternative 2 would be required to consult with LAFD and LADWP during the plan check phase to ensure fire flow requirements are met and any required upgrades to the existing water distribution system are addressed for each individual project. Alternative 2 would be subject to LAFD review and would be required to comply with all applicable LAFD, Department of Building and Safety, and other City fire safety requirements, including hydrant and access improvements, if necessary, to adequately mitigate fire protection impacts.

Alternative 2 would result in less development as compared to the Project (a reduction in 185,371 square feet of medical space, a reduction in 140,595 square feet of parking, and no commercial space). Alternative 2 would result in less growth than the Project, because Alternative 2 would have less capacity for employees as compared to the Project. Compliance with Los Angeles Building and Fire Code requirements would ensure that adequate fire prevention features are provided, which would reduce the demand on LAFD facilities and equipment. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less than significant impact.

(ii) Police Protection Services

Alternative 2 would be required to provide sufficient lighting of building entries, walkways, and other points of building entry to provide for pedestrian orientation and clearly identify a secure route of entry during construction. Furthermore, Alternative 2 would be required to consult with the Los Angeles Police Department (LAPD) during the plan check phase to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services.

Alternative 2 would be subject to comply with all applicable state, LAPD, Department of Building and Safety, and other City requirements regarding emergency access. As is the case under the existing condition, emergency vehicles would access the Project Site and

each of the related projects directly from surrounding roadways. As such, emergency access to the Project vicinity would be maintained at all times, and Alternative 2's construction and operational traffic would not significantly impact emergency vehicle response. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less than significant impact.

(iii) Schools

As shown in Table V-2A, Alternative 2 would result in a net increase of square footage of commercial, residential, and/or hospital use floor area. Alternative 2 could include a residential component, and therefore, would directly generate a residential population. Therefore, Alternative 2 could result in additional population growth as compared to the project. Similar to the Project, impacts under Alternative 2 are considered less than significant. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less than significant impact.

(iv) Parks and Recreation

Alternative 2 would generate increased employment opportunities, which could indirectly generate population growth. Alternative 2 would result in less development as compared to the Project (a reduction in 185,371 square feet of medical space, a reduction in 140,595 square feet of parking, and no commercial space). Alternative 2 would result in less growth than the Project, because Alternative 2 would have less capacity for employees as compared to the Project. The construction and operation of Alternative 2 is not anticipated to result in a direct or indirect impact associated with parks and recreation facilities. Alternative 2's increase in new employees would not change the current park service ratio of 0.3 park acres per 1,000 residents in the Hollywood South area. Additionally, this is assuming that the increase in residents would all occur within the Hollywood South area. However, it is likely that new residents would be located throughout the City, not just the Hollywood South area. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(v) Library Services

Alternative 2 would generate increased employment opportunities, which could indirectly generate population growth. Alternative 2 would result in less development as compared to the Project (a reduction in 185,371 square feet of medical space, a reduction in 140,595 square feet of parking, and no commercial space). Alternative 2 would result in less growth than the Project, because Alternative 2 would have less capacity for employees as compared to the Project. Alternative 2 would result in less indirect population and direct employee growth than the Project. Therefore, this growth

is nominal and would not substantially impact Los Angeles Public Library facilities. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(l) Transportation

(i) Applicable Circulation Program

Alternative 2 would result in less development as compared to the Project (a reduction in 185,371 square feet of medical space, a reduction in 140,595 square feet of parking, and no commercial space) and, similar to the Project, would result in new mobile trips. However, Alternative 2 would result in fewer vehicular trips than the Project, because Alternative 2 would have less capacity for employees, patients, and visitors as compared to the Project. As examined in the Land Use and Planning section of the Draft EIR (Section V.I) and the Transportation section of the Draft EIR (Section V.M), the Project would be consistent with the applicable plans addressing the circulation system. Therefore, similar to the Project, Alternative 2 would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(ii) Vehicle Miles Traveled

Alternative 2 would result in less development as compared to the Project and, would result in fewer mobile trips compared to the Project as it would have less capacity for employees, patients, and visitors as compared to the Project.

Per the Los Angeles Department of Transportation's (LADOT's) methodology included in the Transportation Assessment Guidelines, the City of Los Angeles' VMT Calculator was used to estimate the daily trips and daily VMT for Alternative 2. For Alternative 2, the address (e.g., 4867 West Sunset Boulevard, 90027) and land use (e.g., 176,000 square feet of medical office) were input into the VMT Calculator. Compared to the existing buildings that are being demolished (234,000 square feet of medical office generates 5,459 daily vehicle trips and 36,455 daily VMT as shown in worksheets included Appendix O), Alternative 2 will generate 4,111 daily vehicle trips and 27,453 daily VMT as shown in worksheets included in Appendix O. Since Alternative 2 will generate fewer trips than existing conditions and would not add 250 or more net new daily trips, it would not require a detailed VMT analysis per LADOT guidelines.

Thus, Alternative 2 would not require a VMT analysis and would be presumed to result in a less-than-significant VMT impact. Therefore, impacts related to Alternative 2's potential conflict with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant.

(iii) Traffic Hazards

Similar to the Project, Alternative 2 likely would not involve changes to adjacent roadways. Review of the Alternative 2 driveways associated with the future development sites would be required to ensure access risks or deficiencies associated with the adjoining street system due to curves, slopes, walls or other barriers to adequate lines of sight are not present. Therefore, similar to the Project, impacts under Alternative 2 would be less than significant.

(iv) Inadequate Emergency Access

Implementation of Alternative 2 would require a Construction Staging and Traffic Management Plan, which includes any street closure information, a detour plan, haul routes, and a staging plan; formalizes how construction would be carried out; and identifies specific actions that would be required to reduce effects on the surrounding community. Therefore, Alternative 2's impact to emergency access during construction would be less than significant.

All Project driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project. Similar to the Project, there will be no new primary Project Site driveways in immediate proximity to this intersection as part of Alternative 2. Impacts from under Alternative 2, like those of the Project, would be less than significant.

(m) Tribal Cultural Resources

The City determined no tribal cultural resources (TCRs), pursuant to the criteria set forth in California PRC Section 5024.1, are within the Project Site and that there will be no impact to TCRs as a result of the Project. Similar to the Project's less-than-significant impact, Alternative 2 would also result in less-than-significant impacts, as Alternative 2 would also be subject to the City's standard condition of approval to address inadvertent discovery of TCRs.

(n) Utilities and Service Systems

(i) Water

Alternative 2 would result in less development as compared to the Project (a reduction in 185,371 square feet of medical space, a reduction in 140,595 square feet of parking, and no commercial space). Alternative 2 would result in less water demand and infrastructure needs than the Project, because Alternative 2 would have less floor area as compared to the Project.

During construction, water would be required intermittently for dust control, equipment cleaning, soil grading, and preparation during each phase of Alternative 2. Prior to construction, with approval from the LADWP, temporary water supply needs during construction would be obtained from existing metered water connections or fire hydrants. Therefore, Alternative 2 would not result in significant environmental effects due to the relocation or construction of new or expanded water facilities, and short-term construction impacts would be less than significant.

The anticipated Project water demand during Alternative 2's operations phase has been accounted for in the City's overall total demand projections in the LADWP 2015 UWMP, using a service area-wide approach that does not rely on individual development demand. The UWMP utilized SCAG's 2012 Regional Transportation Plan (RTP) data that provide for more reliable water demand forecasts, taking into account changes in population, housing units, and employment. Based on City Planning Department's determination that the Project is consistent with the demographic forecasts for the City, from SCAG's 2012 RTP, as shown in Section IV.O.1 of the Draft EIR, LADWP finds the Project water demand is included in the City's LADWP 2015 UWMP water demand projection. Therefore, because Alternative 2 would involve less development than the Project, it would involve less water demand, which would also be included in the UWMP water demand projection. Alternative 2 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impact.

(ii) Wastewater

Alternative 2 would result in less development as compared to the Project (a reduction in 185,371 square feet of medical space, a reduction in 140,595 square feet of parking, and no commercial space). Alternative 2 would result in less wastewater generation than the Project, because Alternative 2 would have less floor area as compared to the Project.

As part of Alternative 2's permit process, the City would conduct detailed gauging and evaluation to identify specific sewer connection points. If additional sewer line capacity is needed to serve Alternative 2, Kaiser Permanente would be required to install adequately sized sewer lines to a point in the sewer system with sufficient capacity. Alternative 2 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impact.

(iii) Solid Waste

Construction of Alternative 2 would result in the generation of solid waste such as scrap lumber, concrete, residual wastes, packing materials, plastics, and soils. The construction and demolition debris associated with the Project would primarily be classified as inert waste and would be recycled in accordance with City of Los Angeles Ordinance 181519 (Amendment to the LAMC and LAMC Chapter VI, Article 6, Sections 66.32 through

66.32.5), at one of the City's certified processing facilities, including the Azusa Land Reclamation Landfill, which has a remaining capacity of 57,716,118 tons and remaining intake of 5,142 tons per day (tpd). Other facilities that process inert waste and other construction and demolition waste in the County have a collective maximum daily capacity of 18,516 tons. In addition, numerous processing facilities for construction and demolition wastes are located throughout the County, the nearest of which is the American Reclamation CDI Processing Facility. This facility has a permitted capacity of 174 tpd and has a construction and demolition recycling rate of 85 percent. As such, any construction and demolition debris requiring disposal at an inert waste landfill would be sufficiently accommodated by existing landfills. For the reasons stated above, Alternative 2 demolition and construction would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. As such, impacts would be less than significant.

As shown in Table V-2B, Alternative 2 would result in similar development (building area) to the Project and would result in solid waste generation. Similar to the Project and per AB 939, Alternative 2 would be required to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. Through compliance with applicable regulations and contracting with approved waste hauling companies, Alternative 3 would achieve the required source reduction and recycling rates.

The total daily intake capacity of nearby landfills is currently 26,994 tons per day, leaving a significant amount of availability even with implementation of Alternative 2. A significant amount of solid waste would be directed to the new Mesquite Landfill, which has a permitted daily intake allowance of 20,000 tons; bringing additional relief to other landfills and providing another location for solid waste to be taken. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less than significant impact.

(iv) Expanded Electric Power, Natural Gas, or Telecommunications Facilities

As shown in Table V-2B, Alternative 2 would result in similar development (building area) to the Project and would result in electricity, natural gas, and telecommunications demand. Upgrades would likely be required with respect to electric power and telecommunication facilities, based on the change in land use (i.e., higher density and increase in on-site technology). Natural gas line upgrades may also be similarly required. However, such upgrades would be confined to the lateral connections to the Project Site and not any centralized facilities. This significance criterion is generally applicable to projects that are not already served by municipal utilities, or for large specific plans or greenfield developments, because it is those projects that either need to construct new electrical power, natural gas, and telecommunication centralized facilities, or that would tax existing infrastructure. As a result, impacts associated with upgrades of electric, natural gas, and telecommunication lateral connections to the Project Site would be less

than significant. Alternative 2 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(o) Energy Consumption and Conservation

Alternative 2 would result in less development as compared to the Project (a reduction in 185,371 square feet of medical space, a reduction in 140,595 square feet of parking, and no commercial space). Therefore, Alternative 2 would require less energy when compared to the Project. The Project's energy requirements would not significantly affect local and regional supplies or require additional capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would also be sufficient to meet the needs of Project-related construction and operations. Alternative 2 would result in similar development as compared to the Project and thus would result in similar energy consumption demand during construction and operation. During operations, Alternative 2 will comply with existing energy efficiency requirements such as the California Green Building Standards Code, also known as CALGreen, as well as include energy conservation measures beyond requirements. In summary, Alternative 2's energy demands would not significantly affect available local and regional energy supplies, would comply with existing energy efficiency standards, and would not require additional capacity.

Similar to the Project, Alternative 2 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2016 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City of Los Angeles Green Building Code. With regard to transportation uses, the alternative design would reduce the VMT throughout the region and encourage use of alternative modes of transportation. The alternative would be consistent with regional planning strategies that address energy conservation. As discussed above and in Section IV.I, Land Use, of this Draft EIR, SCAG's 2016 RTP/Sustainable Communities Strategy (SCS) focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2016 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The alternative would be consistent with the 2016–2040 RTP/SCS goals and policies. In addition, the Project would comply with State energy efficiency requirements and would use electricity from LADWP, which has a current renewable energy mix of 29 percent. All of these features would serve to reduce the consumption of electricity, natural gas, and transportation fuel. Based on the above, the alternative would be consistent with adopted energy conservation plans. Alternative 2 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impact.

(3) Comparison of Impacts

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

(4) Relationship of Alternative 2 to Project Objectives

Alternative 2 could result in the development of residential, commercial, and/or hospital uses that would not focus new development of the medical office, hospital, and related uses in the same arrangement and to the same degree or design for each contemplated use that the Project would develop. As a consequence, development under Alternative 2 would not ensure that the following Project Objectives would be achieved or met as fully as the Project would:

1. Replace existing, obsolete facilities with new, state-of-the-art medical care facilities that increase efficiency and capacity within the existing Medical Center campus, allowing for the reallocation of employed health care professionals from several functionally deficient MOBs to more conveniently serve community residents within a regional healthcare hub.

2. Expand the Medical Center campus through the construction and operation of additional new medical facilities, providing long-range health care capacity and flexibility to accommodate future growth and the changing needs of the regional population.

3. Create employment opportunities for careers in health care, including more than 800 new employment opportunities in various medical professions and through the expansion and operation of a teaching hospital.

4. Redesign the existing campus to improve the safety and efficiency of internal circulation of vehicles and pedestrians, and the functionality and accessibility of all facilities and services, including parking.

5. Promote public transit and reduce reliance on vehicular transportation by siting a range of outpatient care services, such as cardiology, radiology, neurology, pulmonary, and other services, on one campus near a major transit station (i.e., the Metro B Line Vermont/Sunset Station) rather than at several off-campus locations, and incorporating pedestrian-friendly features (such as pocket parks and street furniture) into the overall Project design.

6. Implement green building features using the standards of the Green Guide for Healthcare, as such standards evolve over time, and achieve Leadership in Energy and Environmental Design (LEED) Gold certification or equivalent, as well as implement Kaiser Permanente's existing sustainable building strategies.

c) Alternative 3: Reduced Intensity Alternative

(1) Description of the Alternative

With the intent to reduce development intensity impacts of the Project, Alternative 3 would reduce the proposed Project development on Sites 1, 3, 4, and 5. The development on Sites 2 and 6 would be the same as the Project.

Alternative 3 includes the following modifications to the Project:

Site 1

- Reduce 130,000-square-foot MOB development at 1345 North Vermont by 10,000 square feet, for a total of 120,000 square feet.
  - The 562-stall parking structure would be the same size and maintain the same number of parking spaces as the Project in order to support business operations. However, as the overall square footage of the MOB is being reduced, the proposed number of parking spaces would exceed the amount of parking required.
  - The MOB would maintain the same height as the Project at 129 feet and would also be comprised of 9 levels above grade and 4 levels below grade.

Site 3

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

Site 4

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

Site 5

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

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

TABLE V-3A
ALTERNATIVE 3 BUILDOUT SCENARIO COMPARISON

Proposed Sites	Project Buildout	Alternative 3 Buildout
Site 1 1345 North Vermont Avenue	• MOB (130,000 square feet) and 562-stall parking structure (302,800 square feet) • 129 feet in height (13 levels; 9 above grade, 4 below grade)	• MOB (120,000 square feet) and 562-stall parking structure (302,800 square feet) • 129 feet in height (13 levels—9 above grade, 4 below grade)
Site 2 4760 Sunset Boulevard	• 50,000-square-foot Procedure Center addition to an existing MOB at 4760 Sunset Boulevard (for a total of 113,383 square feet of medical office space at this property); 6 parking stalls • 80 feet in height (4 levels)	No change from the Project
Site 3 1505 North Edgemont Street	Option A • 41,500-square-foot MOB • 70 feet in height (3 levels) Option B • 73,500-square-foot MOB • 90 feet in height (5 levels)	• 16,500-square-foot MOB • 50 feet in height (2 levels)
Site 4 1526 North Edgemont Street	Option A • 177,300-square-foot MOB • 105 feet in height (6 levels, with 5 above grade, 1 below grade) Option B • 177,300-square-foot, 105-bed hospital addition and bridge connections to existing hospital • 100 feet in height (6 levels, with 5 above grade, 1 below grade)	• 167,300-square-foot MOB • 105 feet in height (6 levels, with 5 above grade, 1 below grade)
Site 5 1517 North Vermont Avenue	• 230,600-square-foot parking structure with 578 parking spaces • 2,300 square feet of ground floor retail/commercial space • 105 feet in height (10 levels, with 8 above grade, 2 below grade)	• 230,600-square-foot parking structure with 578 parking spaces • 0 square feet of ground floor retail/commercial space • 105 feet in height (10 levels, with 8 above grade, 2 below grade)

TABLE V-3A
ALTERNATIVE 3 BUILDOUT SCENARIO COMPARISON

Proposed Sites	Project Buildout	Alternative 3 Buildout
Site 6 4950 West Sunset Boulevard	• 241-stall parking structure addition to the 4950 West Sunset Boulevard parking structure (122,400 square feet) • 90 feet in height (9 levels)	No change from the Project

NOTE: MOB = medical office building.

TABLE V-3B
ALTERNATIVE 3 AND PROJECT BUILDOUT SCENARIO COMPARISON

Land Use	Project Option A Buildout (square feet)	Project Option B Buildout (square feet)	Alternative 3 Buildout (square feet)
Medical Use – Hospital Use	50,000	227,300	50,000
Medical Use - MOB	462,183	316,883	417,183
Commercial	2,300	2,300	0
Parking	655,800	655,800	353,000
Total Development (without Parking)	514,483	546,483	467,183

NOTE: MOB = medical office building.

While less intensive in development, Alternative 3 would not completely avoid the significant and unavoidable noise and vibration impacts associated with the Project, because noise and vibration would still result from heavy construction equipment. Alternative 3 would reduce less-than-significant or less-than-significant with mitigation impacts associated with the Project, as shown in Table V-5.

(2) Environmental Impact Analysis

(a) Air Quality

(i) Consistency with Air Quality Management Plan

Alternative 3 would result in less development as compared to the Project (a reduction in 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no commercial space). Because there would be less development when compared to the Project, Alternative 3 would generate less operational mobile trips, because less space would be available to accommodate employees, patients, and visitors. As shown in Table IV.B-9 through Table IV.B-13, in Section IV.B, Air Quality, of this Draft EIR, the Project would result in criteria air pollutant emissions below SCAQMD thresholds. Therefore, Alternative 3 would not exceed the SCAQMD significance threshold for criteria air pollutant emissions, because the Alternative would result in less emissions when compared to the Project. Alternative 3 would not result in an impact related to an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the 2016 AQMP. Alternative 3 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(ii) Construction Emissions (Violation of Air Quality Standards and Cumulatively Considerable Impacts)

Alternative 3 would result in less development as compared to the Project (a reduction in 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no commercial space). Therefore, Alternative 3 would require less construction activity when compared to the Project. Daily construction emissions of the Project would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ during construction in all construction years and would result in a less than significant impact. Alternative 3 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(iii) Operational Emissions (Violation of Air Quality Standards and Cumulatively Considerable Impacts)

Alternative 3 would result in less development as compared to the Project (a reduction in 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no commercial space). Because there would be less development when compared to the Project, Alternative 3 would generate less operational mobile trips, because less space would be available to accommodate employees, patients, and visitors. Additionally, Alternative 3 would require less construction activity when compared to the Project. As

shown in Table IV.B-12 and Table IV.B-13, the Project would result in criteria air pollutant emissions below SCAQMD thresholds. Similar to the Project, Alternative 3 would not exceed the SCAQMD significance threshold for criteria air pollutant emissions. Therefore, Alternative 3 would not result in an impact related to an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the 2016 AQMP. Alternative 3 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(iv) Sensitive Receptors

Alternative 3 would result in less development as compared to the Project (a reduction in 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no commercial space). Because there would be less development when compared to the Project, Alternative 3 would generate less operational mobile trips and thus less impacts to sensitive receptors, because less space would be available to accommodate employees, patients, and visitors. Additionally, Alternative 3 would require less construction activity when compared to the Project. Therefore, similar to the Project (as shown in Tables IV.B-14 through IV.B-16), it is likely that Alternative 3 would result in less-than-significant impacts. Alternative 3 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(v) Odors

Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and to architectural coatings. Similar to the Project, such odors would cease upon completion of construction. Land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(b) Biological Resources

The Project area is largely urbanized and does not support special-status species, riparian habitat, or sensitive natural communities, and no bodies of water or wetlands exist on the Project Site. The Project Site does support a number of trees, the removal of which could result in cumulative impacts to migratory bird species. However, as the project areas for both the Project and Alternative 3 are similar, Alternative 3 would comply with the Migratory Bird Treaty Act and Mitigation Measure **MM-BIO-1**, and as such, impacts related to migratory and nesting birds would be less than significant. Alternative

3 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(c) Cultural Resources

(i) Historical Resources

Alternative 3 would result in less development as compared to the Project (a reduction in 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no commercial space). Each of the six evaluated buildings proposed for demolition as part of the Project (1526 North Edgemont Street, 1517 North Vermont Avenue, 1505 North Vermont Avenue, 1321 North Vermont Avenue, 1345 North Vermont Avenue, and 1328 North New Hampshire Avenue) were determined ineligible for listing at the national, State, or local level, and they may not be considered historical resources under CEQA. Alternative 3 is located adjacent to the Aline Barnsdall Complex and Hollywood Presbyterian Medical Center; however, this would not impair the ability of either resource to convey their significance. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(ii) Archaeological Resources

The results of the archaeological record search from 2018 for the Project Site, which is the same site as the Alternative 3 site, indicate that there are no previously identified archaeological resources within the individual building sites and no archaeological resources within a 0.25-mile radius of Project Site. However, the potential exists for unknown archaeological resources to be inadvertently unearthed during earth-moving activities associated with construction of Alternative 3. As with the Project, in the unexpected event that Alternative 3 construction activities unearth intact cultural or archaeological materials, a potentially significant impact could result, and as such, additional mitigation would be required. Mitigation Measure **MM-CUL-1** requires that all construction work occurring within 100 feet of the find is immediately stopped until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology can evaluate the significance of the find. Alternative 3 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(iii) Human Remains

No prehistoric or historic burials were identified within the Project and Alternative 3 area as a result of the records search. However, the possibility of encountering human remains within the Project and Alternative 3 area exists. In the unexpected event that human remains are unearthed during construction activities associated with Alternative 3, impacts would be potentially significant. Mitigation Measure **MM-CUL-3** requires that if human

remains are found, the County Coroner shall be immediately notified of the discovery. With the implementation of Mitigation Measure **MM-CUL-3** and like the Project, Alternative 3 would not disturb any human remains, including those interred outside of dedicated cemeteries. Alternative 3 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(d) Geology and Soils

(i) Alquist-Priolo Earthquake Fault, Ground Shaking, Liquefaction, Settlement, Landslides

Southern California is an active seismic region. Although the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, the Project Site would be susceptible to ground shaking during a seismic event. The main seismic hazard affecting the Project Site is moderate to strong ground shaking. However, Kaiser Permanente would be required to design and construct the Project and Alternative 3 in conformance with the most recently adopted California Building Code design parameters, City Building Codes, and design parameters of the Hospital Facilities Seismic Safety Act (as established by the Office of Statewide Health Planning and Development), with respect to new construction.

Adherence to current hospital-specific building codes identified in Section IV.E.2.a, Regulatory Framework, in the Geology and Soils section of this Draft EIR and implementation of standard engineering practices would ensure that Alternative 3 would not expose people, property, or infrastructure to seismically-induced ground-shaking hazards that are greater than the average risk associated with locations in the Southern California region.

Additionally, the potential for liquefaction and associated lateral spreading beneath the Project Site is considered to be low. Since none of the Project Sites in these Hillside Areas are located in City-designated landslide hazard zones, similar to the Project, Alternative 3 would have no impact related to landslides. As such, conformance with building codes, State laws imposing strict seismic safety standards on hospitals and other healthcare facilities, and other applicable standards discussed above would ensure a less-than-significant impact for Alternative 3. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(ii) Erosion/Loss of Topsoil

Through compliance with existing regulations and implementation of BMPs, Alternative 3 would be built in three phases, and select properties would remain vacant and unpaved following demolition, but prior to new construction. Specifically, such a scenario would occur at Site 3 (1505 North Edgemont Street) and Site 4 (1526 North Edgemont Street). Exposure of soils for extended periods of time could result in substantial erosion and loss

of topsoil. However, implementation of Alternative 3 would require erosion control measures and preparation of a SWPPP. Additionally, during operations, most of the Project Site would be developed with impervious surfaces and all stormwater flows would be directed to storm drain features, resulting in no contact with bare soil surfaces. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(iii) Geologic Instability

The Project Site is not susceptible to landslides, lateral spreading, or liquefaction. Therefore, Alternative 3 construction would not increase the potential for these types of geologic phenomena to occur. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(iv) Expansive Soils

Based on geotechnical reports completed for the Project Site, on-site soils locally possess a medium to high expansion potential. However, Alternative 3 would be designed and constructed in conformance with the City's current Building Code requirements, which include either over-excavation of expansion-prone soils and replacement with sandy, non-expansive soils or design of a foundation system that is strong and rigid enough to withstand the anticipated soil movement. Alternative 3 would not create a substantial risk to individuals and/or property. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(v) Septic Tanks

Alternative 3 would not require and would not have septic tanks or other alternative wastewater disposal systems. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(vi) Geologic Feature or Paleontological Resource

In the event that intact paleontological resources are located on the Project Site, ground-disturbing activities associated with construction of Alternative 3, such as grading during site preparation, have the potential to destroy a unique paleontological resource or site. Without mitigation, the potential damage to paleontological resources during construction would be a potentially significant impact. Mitigation Measure **MM-GEO-1** requires that a paleontological monitor be present during all rough grading and other significant ground-disturbing activities in depths greater than 5 feet below ground surface. Alternative 3 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(e) Greenhouse Gas Emissions

(i) Applicable Plan or Policy

Alternative 3 would be subject to the same regulatory requirements and plans as the Project. Therefore, Alternative 3 would also have project design features and renewable energy sources similar to the Project. As recommended by the California Air Resources Board Scoping Plan and the City of Los Angeles Green Building Code, Alternative 3 would use "green building" features as a framework for achieving GHG emissions reductions as new buildings would be designed to achieve LEED Gold or equivalent. Because Alternative 3 is located next to public transit, Alternative 3 would result in less VMT as compared to a standard project. Alternative 3 would comply with the City's Green New Deal, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence, all of which Alternative 3 would feature. Alternative 3 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(ii) Greenhouse Gas Emissions

Alternative 3 would result in less development as compared to the Project (a reduction in 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no commercial space). Because there would be less development when compared to the Project, less energy would be used in construction and for heating and cooling during Project operation. Alternative 3 would also less operational mobile trips, because less space would be available to accommodate employees, patients, and visitors. As shown in Table IV.F-8 and Table IV.F-9 of Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, the Project (Option A or Option B) would result in an insignificant incremental increase in GHG emissions. Therefore, because Alternative 3 would involve less development than the Project, Alternative 3 would also result in less GHG emissions than those of the Project and would also be considered less than significant. Alternative 3 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(f) Hazards and Hazardous Materials

(i) Routine Transport, Use, or Disposal of Hazardous Materials

Alternative 3 would result in development, including demolition and ground-disturbing activities that could cause significant impacts involving routine transport, use, or disposal of hazardous materials. Therefore, mitigation related to PCB waste characterization,

segregation, disposal, and reuse, and the preparation of a hazardous substance management plan identified as Mitigation Measures **MM-HAZ-1 and MM-HAZ-2** would also be required, as it would for the Project. Alternative 3 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(ii) Upset Conditions Involving the Release of Hazardous Materials

Alternative 3 would result in development, including demolition and ground-disturbing activities that could cause significant impacts regarding upset conditions involving the release of hazardous materials. Therefore, mitigation related to PCB waste characterization, segregation, disposal, and reuse; the preparation of a hazardous substance management plan; vapor encroachment; and a soil management plan identified as Mitigation Measures **MM-HAZ-1, MM-HAZ-2, MM-HAZ-3, and MM-HAZ-4** would be required, as it would for the Project. Alternative 3 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(iii) Emit Hazardous Materials Near Schools

The Project Site is located within 0.25 miles 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.

Alternative 3 would result in development, including demolition and ground-disturbing activities that could cause significant impacts involving emitting hazardous materials near schools. Therefore, mitigation related to PCB waste characterization, segregation, disposal, and reuse; the preparation of a hazardous substance management plan; vapor encroachment; and a soil management plan identified as Mitigation Measures **MM-HAZ-1, MM-HAZ-2, MM-HAZ-3, and MM-HAZ-4** would be required, as it would for the Project. Alternative 3 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impact with mitigation.

(iv) Hazardous Materials Site

As discussed in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, a Phase I Environmental Site Assessment was prepared for Site 1 in March 2016 (Appendix F-1), which included a regulatory database search from EDR. Further investigations of Site 1 revealed construction on Site 1 could result in vapor intrusion. Alternative 3 would result in development, including demolition and ground-disturbing activities that could

cause significant impacts involving a hazardous materials site. Therefore, mitigation related to PCB waste characterization, segregation, disposal, and reuse; the preparation of a hazardous substance management plan; vapor encroachment; and a soil management plan identified as Mitigation Measures **MM-HAZ-1, MM-HAZ-2, MM-HAZ-3, and MM-HAZ-4** would be required, as it would for the Project. Alternative 3 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(v) Emergency Response/Evacuation Plan

Alternative 3 would result in development and may involve changes to existing emergency access. The proposed site plans for Alternative 3, including the access driveways, would be reviewed and approved by LAFD during plan check review. Adherence to these requirements would ensure that adequate emergency access is provided and that Alternative 3 would not thus impair implementation of or physically interfere with the selected disaster routes pursuant to the Safety Element of the City's General Plan. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(g) Hydrology and Water Quality

(i) Water Quality Standards

Alternative 3 would include demolition and construction activities that have the potential to adversely affect the quality of stormwater runoff through increases in turbidity, sedimentation, and construction-related pollutants. However, the implementation of BMPs would reduce impacts associated with erosion-induced siltation of downstream drainages and incidental spills of petroleum products. These BMPs could include silt fences, stockpile containment, runoff control devices, tracking controls, and prevention of fluid leaks from construction vehicles.

Land uses associated with Alternative 3 that could contribute pollutants to stormwater runoff in the long term include uncovered parking areas (through small fuel and/or fluid leaks), uncovered refuse storage/management areas, landscape/open space areas (if pesticides/herbicides and fertilizers are improperly applied), and general litter/debris (e.g., generated during facility loading/unloading activities). In addition, there is the potential for lead, asbestos, and medical wastes to be generated, stored and/or handled on site. To the extent these wastes are stored in areas exposed to stormwater runoff, there could be water quality impacts as a result. Implementation of a Hazardous Substance Management, Handling, Storage, Disposal, and Emergency Response Plan for Alternative 3 through mitigation (identified as Mitigation Measure **MM-HAZ-2** for the Project) would ensure such wastes are not exposed to stormwater runoff. Alternative 3

would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation

(ii) Groundwater

The Alternative 3 sites are mostly impervious surfaces; therefore, construction and operation of Alternative 3 is not expected to negatively affect groundwater recharge in the area, or the general direction and velocity of groundwater movement within the underlying groundwater table. For sites left temporarily undeveloped with disturbed soil during the phased Project construction, the SWPPP would require that BMPs be sufficient to temporarily stabilize the site to prevent sediment or other contaminants from leaving the site. These BMPs could include fiber rolls, silt fencing, grading, and perimeter controls to prevent any disturbed soil from leaving the vacant site. Construction and implementation of Alternative 3 would not impact the validity or effectiveness of past, current, or future investigation and/or remediation efforts at the leaking underground storage tank cleanup site.

Alternative 3 does not propose to directly extract groundwater during construction or operation, and no direct adverse impacts to groundwater are expected to occur. Alternative 3's water demand would be less than the Project, because Alternative 3 would result in less development than the Project. Alternative 3's water demand would be consistent with the land use and water demand assumptions contained in LADWP's UWMP.[8] As such Alternative 3 would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that this alternative would impede sustainable groundwater basin management of the basin. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less than significant impact.

(iii) On-site Flooding

Alternative 3 would not result in an increase in impermeable surface areas and therefore no increases in stormwater runoff are expected for Alternative 3. The City's Low-Impact Development Ordinance mandates stormwater management practices intended to encourage stormwater capture, infiltration and reuse. Alternative 3 would be required to control runoff volume and rates emanating from the Project Site by (1) minimizing the impervious surface area and implementing source control measures, (2) controlling runoff from impervious surfaces using structural BMPs (e.g., infiltration, bioretention, and/or rainfall harvest and re-use), and (3) ensuring all structural BMPs are monitored and maintained for the life of Alternative 3. These BMPs would prevent a substantial increase in the rate or amount of surface runoff in a manner which would result in on- or off-site flooding. As a result,

[8] LADWP, UWMP, 2016.

impacts would be less than significant. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(iv) Sustainable Groundwater Management Plan

Through compliance with Regional Water Quality Control Board requirements and a National Pollutant Discharge Elimination System permit, and implementation of a SWPPP (construction phase) and Standard Urban Stormwater Management Plan (operational phase), Alternative 3 would not conflict with or obstruct implementation of the Los Angeles Basin Water Quality Control Plan (Basin Plan). Alternative 3 is not expected to violate any water quality standards, and measures would be taken both during construction and throughout operation to prevent potential contaminants from leaving the site by runoff. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(h) Land Use and Planning

(i) Land Use Plan Consistency

Discretionary approvals requested by Alternative 3 include a Specific Plan Amendment, Project Permit Compliance Review, Site Plan Review, Vesting Tentative Tract Map, Development Agreement, and associated construction permits and other entitlements. The Project Site is highly urbanized and developed. The Project Site is surrounded by a mixture of medical uses, commercial uses, park space, and residences. The Project Site is surrounded by existing Kaiser buildings, the Hollywood Presbyterian Medical Center, and the Children's Hospital Los Angeles. Development of the Project Site with medical uses and parking uses would be consistent with the surrounding uses.

Alternative 3 would develop the surrounding community by replacing inefficient and aging facilities. In addition, by providing additional healthcare services and employment in close proximity to transit, Alternative 3 would assist the City in achieving short- and long-term planning goals and objectives related to reducing urban sprawl, efficiently utilizing existing infrastructure, reducing regional congestion, and improving air quality through the reduction of VMT. This is consistent with SCAG and City codes, plans, and policies for promoting more intense land uses adjacent to transit stations and job centers. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(i) Noise

(i) Noise in Excess of Standards

Alternative 3 would result in less development as compared to the Project (a reduction in 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no commercial space). Although Alternative 3 would involve less development when compared to the Project, construction would occur on all Project Sites and would involve the use of heavy equipment, and the same equipment required as the Project. Therefore Alternative 3 construction noise levels would exceed the applicable significance thresholds for construction in the L.A. CEQA Thresholds Guide (i.e., construction activities lasting more than 10 days in a 3-month period would exceed existing ambient exterior noise levels by 5 A-weighted decibels or more at a noise-sensitive use). The temporary noise levels from construction would represent a substantial increase above existing ambient levels, and no measures exist that could feasibly reduce the temporary increase in construction noise to a level of less than significant. Project operations would include noise from emergency vehicles, vehicles within the parking structures, stationary equipment, and off-site traffic. All of these noise sources would result in less-than-significant impacts, with the exception of stationary equipment. However, the City's code requirements would ensure that stationary equipment complies with applicable noise standards and would not result in a substantial noise increase. Alternative 3 would result in significant and unavoidable impacts, which would be similar to the Project's significant and unavoidable impact.

(ii) Excessive Groundborne Vibration or Noise

Alternative 3 would result in less development as compared to the Project (a reduction in 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no proposed commercial space). Although Alternative 3 would involve less development when compared to the Project, construction would occur on all building sites and would still require the use of heavy equipment. Alternative 3 construction is estimated to result in vibration levels in excess of FTA criteria for annoyance at nearby residences located within approximately 25 feet of conventional construction activities (i.e., at Sites 1, 2, and 6). Construction is estimated to result in vibration levels in excess of FTA criteria for potential building damage at the residences located nearest to Sites 1 and 6.

The primary anticipated source of vibration from operation of Alternative 3 would be on-site and off-site vehicular trips. Passenger vehicle trips are unlikely to result in perceptible or structural damage-inducing vibration levels at nearby uses, because passenger vehicles are relatively light in weight and use pneumatic rubber tires, typically resulting in

negligible levels of vibration.[9] Similarly, vibration from delivery trucks would be unlikely to cause significant levels of vibration. Mechanical equipment would be isolated from the ground by virtue of being located at rooftop levels and (typically) would include vibration-absorbing mounts. Therefore, the potential for groundborne vibration during Project operation would be less than significant.

Alternative 3 would result in significant and unavoidable impacts, which would be similar to the Project's significant and unavoidable impact.

(j) Population and Housing

(i) Population Growth

Alternative 3 would result in less development as compared to the Project (a reduction in 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no commercial space). Alternative 3 would result in less growth than the Project, because Alternative 3 would have less capacity for employees as compared to the Project. Similar to the Project, Alternative 3's employment growth would fall within the forecasted growth for the City, and the Project would not represent a substantial or significant growth as compared to projected growth for the City. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(k) Public Services

(i) Fire Protection Services

Alternative 3 would be subject to the requirements of the Los Angeles Fire Code, including LAMC Section 57,09.07A, which mandates the installation of automatic fire sprinkler systems if a project is located at a distance that exceeds the LAFD required response time. Furthermore, Alternative 3 would be required to consult with LAFD and LADWP during the plan check phase to ensure fire flow requirements are met and any required upgrades to the existing water distribution system are addressed for each individual project. Alternative 3 would be subject to LAFD review and would be required to comply with all applicable LAFD, Department of Building and Safety, and other City fire safety requirements, including hydrant and access improvements, if necessary, to adequately mitigate fire protection impacts.

Alternative 3 would result in less development as compared to the Project (a reduction in 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no commercial space). Alternative 3 would result in less growth than the Project, because Alternative 3 would have less capacity for employees as compared to the Project.

[9] FTA, Transit Noise and Vibration Impact Assessment Manual, May 2006.

Compliance with Los Angeles Building and Fire Code requirements would ensure that adequate fire prevention features are provided, which would reduce the demand on LAFD facilities and equipment. Similar to the Project, Alternative 3 would not result in the need for new or expanded fire protection facilities. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(ii) Police Protection Services

Alternative 3 would be required to provide sufficient lighting of building entries, walkways, and other points of building entry to provide for pedestrian orientation and clearly identify a secure route of entry during construction. Furthermore, Alternative 3 would be required to consult with LAPD during the plan check phase to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services.

Alternative 3 would be subject to comply with all applicable state, LAPD, Department of Building and Safety, and other City requirements regarding emergency access. As is the case under the existing condition, emergency vehicles would access the Project Site and each of the related projects directly from surrounding roadways. As such, emergency access to the Project vicinity would be maintained at all times, and Alternative 3's construction and operational traffic would not significantly impact emergency vehicle response. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(iii) Schools

Alternative 3 would not result in any new housing units and would not have the potential to contribute to housing or student generation impacts. Nonetheless, Alternative 3 would be required to pay development fees for schools to Los Angeles Unified School District (LAUSD) prior to issuance of building permits pursuant to Senate Bill 50. Pursuant to Government Code Section 65995, the payment of these fees would be considered full and complete mitigation of school impacts. Payment of these development fees would offset any potential impacts that could occur to LAUSD from development of Alternative 3 within the LAUSD service area for the Project Site. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(iv) Parks and Recreation

Alternative 3 would generate increased employment opportunities, which could indirectly generate population growth. Alternative 3 would result in less development as compared to the Project (a reduction in 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no commercial space). Alternative 3 would result in less growth

than the Project, because Alternative 3 would have less capacity for employees as compared to the Project. The construction and operation of Alternative 3 is not anticipated to result in a direct or indirect impact associated with parks and recreation facilities. Alternative 3's increase in new employees would not change the current park service ratio of 0.3 park acres per 1,000 residents in the Hollywood South area. Additionally, this is assuming that the increase in residents would all occur within the Hollywood South area. However, it is likely that new residents would be located throughout the City, not just the Hollywood South area. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(v) Library Services

Alternative 3 would generate increased employment opportunities, which could indirectly generate population growth. Alternative 3 would result in less development as compared to the Project (a reduction in 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no commercial space). Alternative 3 would result in less growth than the Project, because Alternative 3 would have less capacity for employees as compared to the Project. Alternative 3 would result in less indirect population and direct employee growth than the Project. Therefore, this growth is nominal and would not substantially impact Los Angeles Public Library facilities. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(l) Transportation

(i) Applicable Circulation Program

Alternative 3 would result in less development as compared to the Project (a reduction in 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no commercial space) and, similar to the Project, would result in new mobile trips. However, Alternative 3 would result in fewer vehicular trips than the Project, because Alternative 3 would have less capacity for employees, patients, and visitors as compared to the Project. As examined in the Land Use and Planning section of the Draft EIR (Section V.I) and the Transportation section of the Draft EIR (Section V.M), the Project would be consistent with the applicable plans addressing the circulation system. Therefore, similar to the Project, Alternative 3 would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(ii) Vehicle Miles Traveled

Alternative 3 would result in less development as compared to the Project (a reduction in approximately 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no commercial space) and, similar to the Project, would result in new mobile trips. However, Alternative 3 would result in less trips than the Project, because Alternative 3 would have less capacity for employees, patients, and visitors as compared to the Project.

The City of Los Angeles' VMT Calculator was used to estimate the VMT for Alternative 3. For Alternative 3, the address (e.g., 4867 W Sunset Boulevard, 90027) and land use (e.g., 120,000 square feet of net new medical office) were input into the VMT Calculator. Also, Transportation Demand Management (TDM) measures required by the City's existing TDM and Trip Reduction Measures Ordinance (i.e., Ordinance No. 168700) and the LAMC were included as project design features.

Alternative 3 would comply with the following TDM strategies mentioned in Project Design Feature **PDF-TRF-2**:

- Education & Encouragement: Promotions and Marketing (TDM Strategy C)
- Bicycle Infrastructure (TDM Strategy F):
    - Include Bike Parking Per LAMC
    - Include Secure Bike Parking and Showers
- Neighborhood Enhancement: Pedestrian Network Improvements (TDM Strategy G)

With the TDM strategies (C, F, and G) included as Project Design Feature **PDF-TRF-2**, the estimated daily work VMT per employee for the proposed Project would be 7.4 daily work VMT per employee, which is lower than the Central Area Planning Commission daily work VMT per-employee threshold of 7.6 daily work VMT per employee (see Appendix O).

Thus, Alternative 3 would result in a less-than-significant VMT impact. Therefore, similar to the Project, impacts related to Alternative 3's potential conflict with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant.

(iii) Traffic Hazards

Alternative 3 likely would not involve changes to adjacent roadways. Review of the Alternative 3 driveways associated with the future development sites would be required

to ensure access risks or deficiencies associated with the adjoining street system due to curves, slopes, walls, or other barriers to adequate lines of sight are not present. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less than significant impact.

(iv) Inadequate Emergency Access

Implementation of Alternative 3 would require a Construction Staging and Traffic Management Plan, which includes any street closure information, a detour plan, haul routes, and a staging plan; formalizes how construction would be carried out; and identifies specific actions that would be required to reduce effects on the surrounding community, Alternative 3's impact to emergency access during construction would be less than significant.

All driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of Alternative 3. There will be no new primary Project Site driveways in immediate proximity to this intersection as part of Alternative 3. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(m) Tribal Cultural Resources

The City determined no TCRs, pursuant to the criteria set forth in California PRC Section 5024.1, are within the Project Site and that there will be no impact to TCRs as a result of the Project. Similar to the Project's less than significant impact, Alternative 3 would also result in less-than-significant impacts, as Alternative 3 would also be subject to the City's standard condition of approval to address inadvertent discovery of tribal cultural resources.

(n) Utilities and Service Systems

(i) Water

Alternative 3 would result in less development as compared to the Project (a reduction in 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no commercial space). Alternative 3 would result in less water demand than the Project, because Alternative 3 would have less floor area as compared to the Project. Alternative 3 would result in less of a demand for water and water infrastructure needs as the Project.

During construction, water would be required intermittently for dust control, equipment cleaning, soil grading, and preparation during each phase of Alternative 3. Prior to construction, with approval from the LADWP, temporary water supply needs during construction would be obtained from existing metered water connections or fire hydrants. Therefore, Alternative 3 would not result in significant environmental effects due to the relocation or construction of new or expanded water facilities, and short-term construction impacts would be less than significant.

The anticipated Project water demand has been accounted for in the City's overall total demand projections in the LADWP 2015 UWMP, using a service area-wide approach that does not rely on individual development demand. The UWMP utilized the SCAG RTP data that provide for more reliable water demand forecasts, taking into account changes in population, housing units, and employment. Based on City Planning Department's determination that the Project is consistent with the demographic forecasts for the City, from the 2012 SCAG RTP, as shown in Section IV.O.1 of the Draft EIR, LADWP finds the Project water demand is included in the City's LADWP 2015 UWMP water demand projection. Therefore, because Alternative 3 would involve less development, it would involve less water demand, which would also be included in the UWMP water demand projection. Alternative 3 would result in less-than-significant impacts, which would be less than the Project's less than significant impact.

(ii) Wastewater

Alternative 3 would result in less development as compared to the Project (a reduction in 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no commercial space). Alternative 3 would result in less wastewater generation than the Project, because Alternative 3 would have less floor area as compared to the Project.

As part of Alternative 3's permit process, the City would conduct detailed gauging and evaluation to identify specific sewer connection points. If additional sewer line capacity is needed to serve Alternative 3, Kaiser Permanente would be required to install adequately sized sewer lines to a point in the sewer system with sufficient capacity. Alternative 3 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impact.

(iii) Solid Waste

Similar to the Project and per AB 939, Alternative 3 would be required to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. Through compliance with applicable regulations and contracting with approved waste hauling companies, Alternative 3 would achieve the required source reduction and recycling rates.

Construction of Alternative 3 would result in the generation of solid waste such as scrap lumber, concrete, residual wastes, packing materials, plastics, and soils. The construction and demolition debris associated with the Project would primarily be classified as inert waste and would be recycled in accordance with City of Los Angeles Ordinance 181519 (Amendment to the LAMC and LAMC Chapter VI, Article 6, Sections 66.32 through 66.32.5), at one of the City's certified processing facilities, including the Azusa Land Reclamation Landfill, which has a remaining capacity of 57,716,118 tons and remaining intake of 5,142 tpd. Other facilities that process inert waste and other construction and demolition waste in the County have a collective maximum daily capacity of 18,516 tons. In addition, numerous processing facilities for construction and demolition wastes are located throughout the County, the nearest of which is the American Reclamation CDI Processing Facility. This facility has a permitted capacity of 174 tpd and has a construction and demolition recycling rate of 85 percent. As such, any construction and demolition debris requiring disposal at an inert waste landfill would be sufficiently accommodated by existing landfills. For the reasons stated above, Alternative 3 demolition and construction would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. As such, impacts would be less than significant.

The total daily intake capacity of nearby landfills is currently 26,994 tons per day, leaving a significant amount of availability even with implementation of Alternative 3. A significant amount of solid waste would be directed to the new Mesquite Landfill, which has a permitted daily intake allowance of 20,000 tons,[10] bringing additional relief to other landfills and providing another location for solid waste to be taken. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less than significant impact.

(iv) Expanded Electric Power, Natural Gas, or Telecommunications Facilities

Alternative 3 would result in similar development (building area) to the Project and would result in electricity, natural gas, and telecommunications demand. Upgrades would likely be required with respect to electric power and telecommunication facilities, based on the change in land use (i.e., higher density and increase in on-site technology). Natural gas line upgrades may also be similarly required. However, such upgrades would be confined to the lateral connections to the Project Site and not any centralized facilities. This significance criterion is generally applicable to projects that are not already served by municipal utilities, or for large specific plans or greenfield developments, because it is those projects that either need to construct new electrical power, natural gas, and telecommunication centralized facilities, or that would tax existing infrastructure. As a result, impacts associated with upgrades of electric, natural gas, and telecommunication lateral connections to the Project Site would be

[10] LACDPW 2019

less than significant. Alternative 3 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(o) Energy Consumption and Conservation

Alternative 3 would result in less development as compared to the Project (a reduction in 45,000 square feet of medical space, a reduction in 302,800 square feet of parking, and no commercial space). Therefore, Alternative 3 would require less energy when compared to the Project. The Project's energy requirements would not significantly affect local and regional supplies or require additional capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would also be sufficient to meet the needs of Project-related construction and operations. Alternative 3 would result in less development as compared to the Project, and thus, would result in less energy consumption demand during construction and operation. During operations, Alternative 3 will comply with existing energy efficiency requirements such as CALGreen, as well as include energy conservation measures beyond requirements. In summary, Alternative 3's energy demands would not significantly affect available local and regional energy supplies, would comply with existing energy efficiency standards, and would not require additional capacity.

Alternative 3 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2016 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City of Los Angeles Green Building Code. With regard to transportation uses, the alternative design would reduce the vehicle miles travelled throughout the region and encourage use of alternative modes of transportation. Alternative 3 would be consistent with regional planning strategies that address energy conservation. As discussed above and in Section IV.I, Land Use, of this Draft EIR, SCAG's 2016–2040 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2016–2040 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Alternative would be consistent with the 2016–2040 RTP/SCS goals and policies. In addition, the Project would comply with state energy efficiency requirements and would use electricity from LADWP, which has a current renewable energy mix of 29 percent. All of these features would serve to reduce the consumption of electricity, natural gas, and transportation fuel. Based on the above, the alternative would be consistent with adopted energy conservation plans.

Alternative 3 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impact.

(3) Comparison of Impacts

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

(4) Relationship of Alternative 3 to Project Objectives

Alternative 3 would not meet the following objectives as effectively or fully as the Project would because Alternative 3, with its reduced overall density and reduced number of facilities, equipment, and healthcare professionals, would substantially lessen the Project's ability to:

1. Replace existing, obsolete facilities with new, state-of-the-art medical care facilities that increase efficiency and capacity within the existing Medical Center campus, allowing for the reallocation of employed health care professionals from several functionally deficient MOBs to more conveniently serve community residents within a regional healthcare hub.

2. Expand the Medical Center campus through the construction and operation of additional new medical facilities, providing long-range health care capacity and flexibility to accommodate future growth and the changing needs of the regional population.

3. Create employment opportunities for careers in health care, including more than 800 new employment opportunities in various medical professions and through the expansion and operation of a teaching hospital.

4. Redesign the existing campus to improve the safety and efficiency of internal circulation of vehicles and pedestrians, and the functionality and accessibility of all facilities and services, including parking.

5. Promote public transit and reduce reliance on vehicular transportation by siting a range of outpatient care services, such as cardiology, radiology, neurology, pulmonary, and other services, on one campus near a major transit station (i.e., the Metro B Line Vermont/Sunset Station) rather than at several off-campus locations, and incorporating pedestrian-friendly features (such as pocket parks and street furniture) into the overall Project design.

6. Implement green building features using the standards of the Green Guide for Healthcare, as such standards evolve over time, and achieve Leadership in Energy and Environmental Design (LEED) Gold certification or equivalent, as well as implement Kaiser Permanente's existing sustainable building strategies.

d) Alternative 4: Reduced Intensity and Parking Alternative

(1) Description of the Alternative

The Reduced Intensity and Parking Alternative considers a reduction in development and parking as compared to the Project. This alternative is considered because it proposes less development when compared to the Project and thus has the potential to reduce Project impacts associated with development intensity. Alternative 4 would reduce the proposed Project development on Sites 1, 3, 4, 5, and 6. The development on Project Site 2 would be the same as the Project.

Alternative 4 would provide a total of 1,291 automobile parking spaces, which would meet the minimum parking requirements for Hospitals and Medical Uses provided for in SNAP Section 9.E.4.(i)[11], and Los Angeles Municipal Code Sections 12.21.A.4.(d)(1)[12], and 12.21.A.4.(x)(3)6[13]. This would be 615 fewer automobile parking spaces than the proposed Project's parking of 1,906 new automobile spaces.

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

Site 1

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

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

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

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

Site 3

- Increase the Project's Option A (41,500-square-foot MOB development) by 7,000 square feet or reduce the Project's Option B (73,500-square-foot MOB development) by 25,000 square feet, at 1505 North Edgemont Street for a total of 48,500 square feet.

  – Development at Site 3 under Alternative 4 would reduce the MOB by one floor level, resulting in a building that would be 72 feet tall and 4 levels in height, as compared to Project, which would be 90 feet tall and 5 levels in height.

Site 4

- Eliminate the Project's Option A (construction of a 177,300-square-foot MOB) and pursue the Project's Option B (construction of a 177,300-square-foot, 105-bed hospital) at 1526 North Edgemont as currently proposed for the Project.

  – There would be no change to the 105-foot height of the hospital as compared to the Project, and there would be still be 5 levels above grade and 1 level below grade.

Site 5

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

Site 6

- Reduce 122,400-square-foot parking structure addition at 4950 West Sunset Boulevard by 40,000 square feet (3 levels).

  – The parking structure would be reduced by 3 levels, for a total of 6 levels, and measure 60 feet tall, as compared the Project's 9-level parking structure, which would measure 90 feet tall. Although this Alternative would result in a reduction of parking spaces, the parking spaces provided would still meet Los Angeles Municipal Code and SNAP minimum parking regulations.

Tables V-4A and V-4B provide a description of the proposed Sites, a description of the Project buildout, and a description of Alternative 4 buildout for comparison.

TABLE V-4A
ALTERNATIVE 4 BUILDOUT SCENARIO COMPARISON

Proposed Sites	Project Buildout	Alternative 4 Buildout
Site 1 1345 North Vermont Avenue	• MOB (130,000 square feet) and 562-stall parking structure (302,800 square feet) • 129 feet in height (13 levels; 9 above grade, 4 below grade)	• MOB (120,000 square feet) and parking structure (302,800 square feet) • 129 feet in height (13 levels; 9 above grade, 4 below grade)
Site 2 4760 Sunset Boulevard	• 50,000-square-foot Procedure Center addition to an existing MOB at 4760 Sunset Boulevard (for a total of 113,383-square-foot medical office space at this property); 6 parking stalls • 80 feet in height (4 levels)	No change from the Project
Site 3 1505 North Edgemont Street	Option A • 41,500-square-foot MOB • 70 feet in height (3 levels) Option B • 73,500-square-foot MOB • 90 feet in height (5 levels)	• 48,500-square-foot MOB • 72 feet in height (4 levels)
Site 4 1526 North Edgemont Street	Option A • 177,300-square-foot MOB • 105 feet in height (6 levels, with 5 above grade, 1 below grade) Option B • 177,300-square-foot, 105-bed hospital addition and bridge connections to existing hospital • 105 feet in height (6 levels, with 5 above grade, 1 below grade)	• 177,300-square-foot, 105-bed hospital addition and bridge connections to existing hospital • 105 feet in height (6 levels, with 5 above grade, 1 below grade)
Site 5 1517 North Vermont Avenue	• 230,600-square-foot parking structure with 578 parking spaces • 2,300 square feet of ground floor retail/commercial space • 105 feet in height (10 levels, with 8 above grade, 2 below grade)	• 230,600-square-foot parking structure • 0 square feet of ground floor retail/commercial space • 105 feet in height (10 levels, with 8 above grade, 2 below grade)

TABLE V-4A
ALTERNATIVE 4 BUILDOUT SCENARIO COMPARISON

Proposed Sites	Project Buildout	Alternative 4 Buildout
Site 6 4950 West Sunset Boulevard	• 241-stall parking structure addition to the 4950 West Sunset Boulevard parking structure (122,400 square feet) • 90 feet in height (9 levels)	• Parking structure addition to the 4950 West Sunset Boulevard parking structure (82,400 square feet) • 60 feet in height (6 levels)

NOTE: MOB = medical office building.

TABLE V-4B
ALTERNATIVE 4 AND PROJECT BUILDOUT SCENARIO COMPARISON

Land Use	Project Option A Buildout (square feet)	Project Option B Buildout (square feet)	Alternative 4 Buildout (square feet)
Medical Use – Hospital Use	50,000	227,300	227,300
Medical Use – MOB	462,183	316,883	281,883
Commercial	2,300	2,300	0
Parking	655,800	655,800	313,000
Total Development (without Parking)	514,483	546,483	509,183

NOTE: MOB = medical office building.

While less intensive in development, Alternative 4 would not completely avoid the significant and unavoidable noise and vibration impacts associated with the Project, because noise and vibration would still result from the use of heavy construction equipment. Alternative 4 would reduce less-than-significant or less-than-significant with mitigation impacts associated with the Project, as shown in Table V-5.

(2) Environmental Impact Analysis

(a) Air Quality

(i) Consistency with Air Quality Management Plan

Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking, and no commercial space). Because there would be less development when compared to the Project, Alternative 4 would generate less operational mobile trips, because less space would be available to accommodate employees, patients, and visitors. Therefore, Alternative 4 would not exceed the SCAQMD significance threshold for criteria air pollutant emissions. Therefore, Alternative 4 would not result in an impact related to an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the 2016 AQMP. Alternative 4 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(ii) Construction Emissions (Violation of Air Quality Standards and Cumulatively Considerable Impacts)

Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking**,** and no commercial space). Therefore, Alternative 4 would require less construction activity when compared to the Project. Daily construction emissions of the Project would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ during construction in all construction years. Therefore, because Alternative 4 would involve less construction activity than the Project, and a similar construction schedule, impacts would also be less than significant. Alternative 4 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(iii) Operational Emissions (Violation of Air Quality Standards and Cumulatively Considerable Impacts)

Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking, and no commercial space). Because there would be less development when compared to the Project, Alternative 4 would generate less operational mobile trips, because less space would be available to accommodate employees, patients, and visitors. Additionally, Alternative 4 would require less construction activity when compared to the Project. As shown in Tables IV.B-12 and IV.B-13 in Section IV.B, Air Quality, of this Draft EIR, the Project would result in criteria air pollutant emissions below SCAQMD

thresholds. Similar to the Project, Alternative 4 would not exceed the SCAQMD significance threshold for criteria air pollutant emissions. Therefore, Alternative 4 would not result in an impact related to an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the 2016 AQMP. Similar to the Project, this impact under Alternative 4 would be less than significant during operation. Alternative 4 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(iv) Sensitive Receptors

Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking, and no commercial space). Because there would be less development when compared to the Project, Alternative 4 would generate less operational mobile trips, because less space would be available to accommodate employees, patients, and visitors. Additionally, Alternative 4 would require less construction activity when compared to the Project. Therefore, similar to the Project, (as shown in Tables IV.B-14 through IV.B-16 in Section IV.B, Air Quality, of this Draft EIR), it is likely that Alternative 4 would not exceed the SCAQMD significance threshold for criteria air pollutant emissions and would not result in health impacts. Alternative 4 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(v) Odors

Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and to architectural coatings. Similar to the Project, such odors would cease upon completion of construction. Land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Similar to the Project, Alternative 4 would not result in the creation of a land use that is commonly associated with odors. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(b) Biological Resources

The Project area is largely urbanized and does not support special-status species, riparian habitat, or sensitive natural communities, and no bodies of water or wetlands exist on the Project Site. The Project Site does support a number of trees, the removal of which could result in cumulative impacts to migratory bird species. However, as the project areas for both the Project and Alternative 4 are similar, Alternative 4 would comply

with the Migratory Bird Treaty Act and Mitigation Measure **MM-BIO-1**, and as such, impacts related to migratory and nesting birds would be less than significant. Alternative 4 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(c) Cultural Resources

(i) Historical Resources

Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking, and no commercial space). Each of the six evaluated buildings proposed for demolition as part of the Project (1526 North Edgemont Street, 1517 North Vermont Avenue, 1505 North Vermont Avenue, 1321 North Vermont Avenue, 1345 North Vermont Avenue, and 1328 North New Hampshire Avenue) were determined ineligible for listing at the national, State, or local level, and they may not be considered historical resources under CEQA. Alternative 4 is located adjacent to the Aline Barnsdall Complex and Hollywood Presbyterian Medical Center; however, this would not impair the ability of either resource to convey their significance. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(ii) Archaeological Resources

The results of the archaeological record search from 2018 indicate that there are no previously identified archaeological resources within the individual building sites and no archaeological resources within a 0.25-mile radius of Project Site. However, the potential exists for unknown archaeological resources to be inadvertently unearthed during earth-moving activities associated with construction of Alternative 4. In the unexpected event that construction activities unearth intact cultural or archaeological materials, a potentially significant impact could result, and as such, additional mitigation would be required for the Project and Alternative 4. Mitigation Measure **MM-CUL-1** requires that all construction work occurring within 100 feet of the find is immediately stopped until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology can evaluate the significance of the find. Alternative 4 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(iii) Human Remains

No prehistoric or historic burials were identified within the Project and Alternative 4 area as a result of the records search. However, the possibility of encountering human remains within the Project and Alternative 4 area exists. In the unexpected event that

human remains are unearthed during construction activities associated with Alternative 4, impacts would be potentially significant. Mitigation Measure **MM-CUL-3** requires that if human remains are found, the County Coroner shall be immediately notified of the discovery. With the implementation of mitigation Measure **MM-CUL-3** and like the Project, Alternative 4 would not disturb any human remains, including those interred outside of dedicated cemeteries. Alternative 4 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(d) Geology and Soils

(i) Alquist-Priolo Earthquake Fault, Ground Shaking, Liquefaction, Settlement, Landslides

Southern California is an active seismic region. Although the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, the Project Site would be susceptible to ground shaking during a seismic event. The main seismic hazard affecting the Project Site is moderate to strong ground shaking. However, Kaiser Permanente would be required to design and construct the Project and Alternative 4 in conformance with the most recently adopted California Building Code design parameters, City Building Codes, and design parameters of the Hospital Facilities Seismic Safety Act (as established by the Office of Statewide Health Planning and Development), with respect to new construction.

Adherence to current hospital-specific building codes identified in Section IV.E.2.a, Regulatory Framework of the Draft EIR's Geology and Soils section, and implementation of standard engineering practices would ensure that Alternative 4 would not expose people, property, or infrastructure to seismically-induced ground-shaking hazards that are greater than the average risk associated with locations in the Southern California region.

Additionally, the potential for liquefaction and associated lateral spreading beneath the Project Site is considered to be low. Since none of the Project Sites in these Hillside Areas are located in City-designated landslide hazard zones, Alternative 4 would have no impact related to landslides. As such, like the Project's conformance, conformance by Alternative 4 with building codes, State laws imposing strict seismic safety standards on hospitals and other healthcare facilities, and other applicable standards discussed above would ensure that a less-than-significant impact for Alternative 4, like that of the Project, related to ground shaking, liquefaction, and landslides would occur. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(ii) Erosion/Loss of Topsoil

Through compliance with existing regulations and implementation of BMPs, Alternative 4 would be built in three phases, and select properties would remain vacant and unpaved following demolition, but prior to new construction. Specifically, such a scenario would occur at Site 3 (1505 North Edgemont Street) and Site 4 (1526 North Edgemont Street). Exposure of soils for extended periods of time could result in substantial erosion and loss of topsoil. However, implementation of the alternative would require erosion control measures and preparation of a SWPPP. BMPs that Kaiser Permanente will implement during construction include good housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, stormwater inlet protection, soil stabilization measures). Additionally, during operations, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drain features, resulting in no contact with bare soil surfaces. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(iii) Geologic Instability

The Project Site is not susceptible to landslides, lateral spreading, or liquefaction. Therefore, similar to the Project, Alternative 4 construction would not increase the potential for these types of geologic phenomena to occur. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(iv) Expansive Soils

Based on geotechnical reports completed for the Project Site, on-site soils locally possess a medium to high expansion potential. However, similar to the Project, Alternative 4 would be designed and constructed in conformance with the City's current Building Code requirements, which require either over excavation of expansion-prone soils and replacement with sandy, non-expansive soils or design of a foundation system that is strong and rigid enough to withstand the anticipated soil movement. Thus, like the Project, Alternative 4 would not create a substantial risk to individuals and/or property. In addition, like the Project, Alternative 4 would not impact existing expansive soil conditions, as construction would not result in alternating wetting and drying of sediments. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(v) Septic Tanks

Alternative 4 would not require and would not have septic tanks or other alternative wastewater disposal systems. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(vi) Geologic Feature or Paleontological Resource

In the event that intact paleontological resources are located on the Project Site, ground-disturbing activities associated with construction of Alternative 4, such as grading during site preparation, have the potential to destroy a unique paleontological resource or site. Without mitigation, the potential damage to paleontological resources during construction would be a potentially significant impact. Mitigation Measure **MM-GEO-1** requires that a paleontological monitor be present during all rough grading and other significant ground-disturbing activities in depths greater than 5 feet below ground surface. However, with the implementation of Mitigation Measure **MM-GEO-1**, Alternative 4, like the Project, would not cause a substantial adverse change in the significance of a paleontological resource. Alternative 4 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(e) Greenhouse Gas Emissions

(i) Applicable Plan or Policy

Alternative 4 would be subject to the same regulatory requirements and plans as the Project. Therefore, Alternative 4 would also consider project design features and renewable energy sources similar to the Project. As recommended by the California Air Resources Board Scoping Plan, Alternative 4 would use "green building" features as a framework for achieving GHG emissions reductions as new buildings would be designed to achieve LEED Gold or equivalent. Because Alternative 4 is located next to public transit, Alternative 4 would result in less VMT as compared to a standard project. Alternative 4 would comply with the City's Green New Deal, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. Alternative 4 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(ii) Greenhouse Gas Emissions

Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking, and no commercial space). Because there would be less development when compared to the Project, Alternative 4 would generate less operational mobile trips, because less

space would be available to accommodate employees, patients, and visitors. As shown in Table IV.F-8 and Table IV.F-9 of Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, the Project (Option A or Option B) would result in less than significant GHG emissions. Therefore, because Alternative 4 would involve less development than the Alternative 4 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(f) Hazards and Hazardous Materials

(i) Routine Transport, Use, or Disposal of Hazardous Materials

Alternative 4 would result in development, including demolition and ground-disturbing activities. Therefore, mitigation related to PCB waste characterization, segregation, disposal, and reuse, and the preparation of a hazardous substance management plan would also be required, identified as Mitigation Measures **MM-HAZ-1 and MM-HAZ-2** for the Project. Alternative 4 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(ii) Upset Conditions Involving the Release of Hazardous Materials

Alternative 4 would result in development, including demolition and ground-disturbing activities. Therefore, mitigation related to PCB waste characterization, segregation, disposal, and reuse; the preparation of a hazardous substance management plan; vapor encroachment; and a soil management plan would be required, identified as Mitigation Measures **MM-HAZ-1, MM-HAZ-2, MM-HAZ-3, and MM-HAZ-4** for the Project. Alternative 4 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(iii) Emit Hazardous Materials Near Schools

The Project Site is located within 0.25 miles 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.

Alternative 4 would result in development, including demolition and ground-disturbing activities. Therefore, mitigation related to PCB waste characterization, segregation, disposal, and reuse; the preparation of a hazardous substance management plan; vapor encroachment; and a soil management plan would be required, identified as Mitigation Measures **MM-HAZ-1, MM-HAZ-2, MM-HAZ-3, and MM-HAZ-4** for the Project.

Alternative 4 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(iv) Hazardous Materials Site

As discussed in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, a Phase I Environmental Site Assessment was prepared for Site 1 in March 2016 (Appendix F-1), which included a regulatory databased search from EDR. Further investigations of Site 1 revealed construction on Site 1 could result in vapor intrusion. Alternative 4 would result in development, including demolition and ground-disturbing activities. Therefore, mitigation related to vapor encroachment and a soil management plan would be required, identified as Mitigation Measures **MM-HAZ-3 and MM-HAZ-4** for the Project. Alternative 4 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impacts with mitigation.

(v) Emergency Response/Evacuation Plan

Alternative 4 would result in development and may involve changes to existing emergency access. The proposed site plan for Alternative 4, including the access driveway, would be reviewed and approved by the LAFD during plan check review. Adherence to these requirements would ensure that adequate emergency access is provided and that Alternative 4 would not impair implementation of or physically interfere with the selected disaster routes pursuant to the Safety Element of the City's General Plan. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(g) Hydrology and Water Quality

(i) Water Quality Standards

Alternative 4 would include demolition and construction activities that have the potential to adversely affect the quality of stormwater runoff through increases in turbidity, sedimentation, and construction-related pollutants. However, the implementation of BMPs would reduce impacts associated with erosion-induced siltation of downstream drainages and incidental spills of petroleum products. These BMPs could include silt fences, stockpile containment, runoff control devices, tracking controls, and prevention of fluid leaks from construction vehicles.

Land uses associated with Alternative 4 that could contribute pollutants to stormwater runoff in the long term include uncovered parking areas (through small fuel and/or fluid leaks), uncovered refuse storage/management areas, landscape/open space areas (if pesticides/herbicides and fertilizers are improperly applied), and general litter/debris (e.g., generated during facility loading/unloading activities). In addition, there is the potential for

lead, asbestos, and medical wastes to be generated, stored, and/or handled on site. To the extent these wastes are stored in areas exposed to stormwater runoff, there could be water quality impacts as a result. Implementation of a Hazardous Substance Management, Handling, Storage, Disposal, and Emergency Response Plan would ensure such wastes are not exposed to stormwater runoff. Alternative 4 would result in less-than-significant impacts with mitigation, which would be similar to the Project's less-than-significant impact with mitigation.

(ii) Groundwater

The Alternative 4 sites are mostly impervious surfaces; therefore, construction and operation of Alternative 4 is not expected to negatively affect groundwater recharge in the area, or the general direction and velocity of groundwater movement within the underlying groundwater table. For sites left temporarily undeveloped with disturbed soil during the phased Project construction, the SWPPP would require that BMPs be sufficient to temporarily stabilize the site to prevent sediment or other contaminants from leaving the site. These BMPs could include fiber rolls, silt fencing, grading, and perimeter controls to prevent any disturbed soil from leaving the vacant site. Construction and implementation of Alternative 4 would not impact the validity or effectiveness of past, current or future investigation and/or remediation efforts at the leaking underground storage tank cleanup site.

Alternative 4 does not propose to directly extract groundwater during construction or operation, and no direct adverse impacts to groundwater are expected to occur. Alternative 4's water demand would be less than the Project, because Alternative 3 would result in less development than the Project. Alternative 4's water demand would be consistent with the land use and water demand assumptions contained in LADWP's Urban Water Management Plan.[14] As such Alternative 4 would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that this alternative would impede sustainable groundwater basin management of the basin. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less than significant impact.

(iii) On-Site Flooding

Alternative 4 would not result in an increase in impermeable surface areas and therefore no increases in stormwater runoff are expected for Alternative 4. The City's Low-Impact Development Ordinance mandates stormwater management practices intended to encourage stormwater capture, infiltration and reuse. Alternative 4 would be required to control runoff volume and rates emanating from the Project Site by (1) minimizing the

[14] Los Angeles Department of Water and Power (LADWP), 2015 Urban Water Management Plan, April 2016.

impervious surface area and implementing source control measures, (2) controlling runoff from impervious surfaces using structural BMPs (e.g., infiltration, bioretention, and/or rainfall harvest and re-use), and (3) ensuring all structural BMPs are monitored and maintained for the life of Alternative 4. These BMPs would prevent a substantial increase in the rate or amount of surface runoff in a manner which would result in on- or off-site flooding. As a result, impacts would be less than significant. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(iv) Sustainable Groundwater Management Plan

Through compliance with Regional Water Quality Control Board requirements and a National Pollutant Discharge Elimination System permit, and implementation of a SWPPP (construction phase) and Standard Urban Stormwater Management Plan (operational phase), Alternative 3 would not conflict with or obstruct implementation of the Los Angeles Basin Water Quality Control Plan (Basin Plan). Alternative 4 is not expected to violate any water quality standards and measures would be taken both during construction and throughout operation to prevent potential contaminants from leaving the site by runoff. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(h) Land Use and Planning

(i) Land Use Plan Consistency

Discretionary approvals requested by Alternative 4 include a Specific Plan Amendment, Project Permit Compliance Review, Site Plan Review, Vesting Tentative Tract Map, Development Agreement, and associated construction permits and other entitlements. The Project Site is highly urbanized and developed. The Project Site is surrounded by a mixture of medical uses, commercial uses, park space, and residences. The Project Site is surrounded by existing Kaiser Permanente buildings, the Hollywood Presbyterian Medical Center, and the Children's Hospital Los Angeles. Development of the Project Site with medical uses and parking uses would be consistent with the surrounding uses.

Alternative 4 would develop the surrounding community by replacing inefficient and aging facilities. In addition, by providing additional healthcare services and employment in close proximity to transit, Alternative 4 would assist the City in achieving short- and long-term planning goals and objectives related to reducing urban sprawl, efficiently utilizing existing infrastructure, reducing regional congestion, and improving air quality through the reduction of VMT. This is consistent with SCAG and City codes, plans, and policies for promoting more intense land uses adjacent to transit stations and job centers. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(i) Noise

(i) Noise in Excess of Standards

Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking, and no commercial space). Although Alternative 4 would involve less development when compared to the Project, construction would occur on all building sites and would involve the use of heavy construction equipment, and the same equipment required as the Project. Therefore Alternative 4 construction noise levels would exceed the applicable significance thresholds for construction in the L.A. CEQA Thresholds Guide (i.e., construction activities lasting more than 10 days in a 3-month period would exceed existing ambient exterior noise levels by 5 A-weighted decibels or more at a noise-sensitive use). The temporary noise levels from construction would represent a substantial increase above existing ambient levels, and no measures exist that could feasibly reduce the temporary increase in construction noise to a level of less than significant. Project operations would include noise from emergency vehicles, vehicles within the parking structures, stationary equipment, and off-site traffic. All of these noise sources would result in less-than-significant impacts, with the exception of stationary equipment. However, the City's code requirements would ensure that stationary equipment complies with applicable noise standards and would not result in a substantial noise increase. Alternative 4 would result in significant and unavoidable impacts, which would be similar to the Project's significant and unavoidable impacts.

(ii) Excessive Groundborne Vibration or Noise

Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking, and no commercial space). Although Alternative 4 would involve less development when compared to the Project, construction would occur on all building sites and would involve the use of heavy construction equipment, and the same equipment required as the Project. Therefore, Alternative 4 construction is estimated to result in vibration levels in excess of FTA criteria for annoyance at nearby residences located within approximately 25 feet of conventional construction activities (i.e., at Sites 1, 2, and 6). Construction is estimated to result in vibration levels in excess of FTA criteria for potential building damage at the residences located nearest to Sites 1 and 6.

The primary anticipated source of vibration from operation of Alternative 4 would be on-site and off-site vehicular trips. Passenger vehicle trips are unlikely to result in perceptible or structural damage-inducing vibration levels at nearby uses, because passenger vehicles are relatively light in weight and use pneumatic rubber tires, typically resulting in

negligible levels of vibration.[15] Similarly, vibration from delivery trucks would be unlikely to cause significant levels of vibration. Mechanical equipment would be isolated from the ground by virtue of being located at rooftop levels and (typically) would include vibration-absorbing mounts. Therefore, the potential for groundborne vibration during Project operation would be less than significant.

Alternative 4 would result in significant and unavoidable impacts, which would be similar to the Project's significant and unavoidable impacts.

(j) Population and Housing

(i) Population Growth

Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking, and no commercial space). Alternative 4 would result in less growth than the Project, because Alternative 4 would have less capacity for employees as compared to the Project. Similar to the Project, Alternative 4's employment growth would fall within the forecasted growth for the City and the Project would not represent a substantial or significant growth as compared to projected growth for the City. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(k) Public Services

(i) Fire Protection Services

Alternative 4 would be subject to the requirements of the Los Angeles Fire Code, including LAMC Section 57,09.07A, which mandates the installation of automatic fire sprinkler systems if a project is located at a distance that exceeds the LAFD required response time. Furthermore, Alternative 4 would be required to consult with LAFD and LADWP during the plan check phase to ensure fire flow requirements are met and any required upgrades to the existing water distribution system are addressed for each individual project. Alternative 4 would be subject to LAFD review and would be required to comply with all applicable LAFD, Department of Building and Safety, and other City fire safety requirements, including hydrant and access improvements, if necessary, to adequately mitigate fire protection impacts.

[15] FTA, Transit Noise and Vibration Impact Assessment Manual, May 2006.

Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking, and no commercial space). Alternative 4 would result in less growth than the Project, because Alternative 4 would have less capacity for employees as compared to the Project. Compliance with Los Angeles Building and Fire Code requirements would ensure that adequate fire prevention features are provided, which would reduce the demand on LAFD facilities and equipment. Similar to the Project, Alternative 4 would not result in the need for new or expanded fire protection facilities. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(ii) Police Protection Services

Alternative 4 would be required to provide sufficient lighting of building entries, walkways, and other points of building entry to provide for pedestrian orientation and clearly identify a secure route of entry during construction. Furthermore, Alternative 4 would be required to consult with LAPD during the plan check phase to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services.

Alternative 4 would be subject to comply with all applicable state, LAPD, Department of Building and Safety, and other City requirements regarding emergency access. As is the case under the existing condition, emergency vehicles would access the Project Site and each of the related projects directly from surrounding roadways. As such, emergency access to the Project vicinity would be maintained at all times, and Alternative 4's construction and operational traffic would not significantly impact emergency vehicle response. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(iii) Schools

Alternative 4 would not result in any new housing units and would not have the potential to contribute to housing or student generation impacts. Nonetheless, Alternative 4 would be required to pay development fees for schools to LAUSD prior to issuance of building permits pursuant to Senate Bill 50. Pursuant to Government Code Section 65995, the payment of these fees would be considered full and complete mitigation of school impacts. Payment of these development fees would offset any potential impacts that could occur to LAUSD from development of Alternative 4 within the LAUSD service area for the Project Site. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(iv) Parks and Recreation

Alternative 4 would generate increased employment opportunities, which could indirectly generate population growth. Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking, and no commercial space). Alternative 4 would result in less growth than the Project, because Alternative 4 would have less capacity for employees as compared to the Project. The construction and operation of Alternative 4 is not anticipated to result in a direct or indirect impact associated with parks and recreation facilities. Alternative 4's increase in new employees would not change the current park service ratio of 0.3 park acres per 1,000 residents in the Hollywood South area. Additionally, this is assuming that the increase in residents would all occur within the Hollywood South area. However, it is likely that new residents would be located throughout the City, not just the Hollywood South area. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(v) Library Services

Alternative 4 would generate increased employment opportunities, which could indirectly generate population growth. Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking, and no commercial space). Alternative 4 would result in less growth than the Project, because Alternative 4 would have less capacity for employees as compared to the Project. Alternative 4 would result in less indirect population and direct employee growth than the Project. Therefore, this growth is nominal and would not substantially impact Los Angeles Public Library facilities. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(l) Transportation

(i) Applicable Circulation Program

Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking, and no commercial space) and, similar to the Project, would result in new mobile trips. However, Alternative 4 would result in fewer trips than the Project, because Alternative 4 would have less capacity for employees, patients, and visitors as compared to the Project. As examined in the Land Use and Planning section of the Draft EIR (Section V.I) and the Transportation section of the Draft EIR (Section V.M), the Project would be consistent with the applicable plans addressing the circulation system. Similar to the Project,

Alternative 4 would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(ii) Vehicle Miles Traveled

Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking, and no commercial space) and, similar to the Project, would result in new mobile trips. However, Alternative 4 would result in less trips than the Project, because Alternative 4 would have less capacity for employees, patients, and visitors as compared to the Project.

The City of Los Angeles' VMT Calculator was used to estimate the VMT for Alternative 4. For Alternative 4, the address (e.g., 4867 W Sunset Boulevard, 90027) and land use (e.g., 42,000 square feet of net new medical office) were input into the VMT Calculator. Also, TDM measures required by the City's existing TDM and Trip Reduction Measures Ordinance (i.e., Ordinance No. 168700) and the LAMC were included as project design features.

Alternative 4 would comply with the following TDM strategies mentioned in Project Design Feature **PDF-TRF-2**:

- Education & Encouragement: Promotions and Marketing (TDM Strategy C)
- Bicycle Infrastructure (TDM Strategy F):
  - Include Bike Parking Per LAMC
  - Include Secure Bike Parking and Showers
- Neighborhood Enhancement: Pedestrian Network Improvements (TDM Strategy G)

With the TDM strategies (C, F, and G) included as Project Design Feature **PDF-TRF-2**, the estimated daily work VMT per employee for the proposed Project would be 7.4 daily work VMT per employee, which is lower than the Central Area Planning Commission daily work VMT per-employee threshold of 7.6 daily work VMT per employee (see Appendix O).

Thus, Alternative 4 would result in less-than-significant VMT impact. Therefore, similar to the Project, impacts related to Alternative 4's potential conflict with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant.

(iii) Traffic Hazards

Alternative 4 likely would not involve changes to adjacent roadways. Review of the Alternative 4 driveways associated with the future development sites would be required to ensure access risks or deficiencies associated with the adjoining street system due to curves, slopes, walls, or other barriers to adequate lines of sight are not present. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(iv) Inadequate Emergency Access

Implementation of Alternative 4 would require a Construction Staging and Traffic Management Plan, which include any street closure information, a detour plan, haul routes, and a staging plan as well as formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community, Alternative 4's impact to emergency access during construction would be less than significant.

All driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Alternative 4. There will be no new primary Project Site driveways in immediate proximity to this intersection as part of Alternative 4. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(m) Tribal Cultural Resources

The City determined no TCRs, pursuant to the criteria set forth in California PRC Section 5024.1, are within the Project Site and that there will be no impact to TCRs as a result of the Project. Similar to the Project's less-than-significant impact, Alternative 4 would also result in less-than-significant impacts, as Alternative 4 would also be subject to the City's standard condition of approval to address inadvertent discovery of tribal cultural resources.

(n) Utilities and Service Systems

(i) Water

Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking, and no commercial space). Alternative 4 would result in less water demand than the Project,

because Alternative 4 would have less floor area as compared to the Project. Alternative 4 would result in less of a demand for water and water infrastructure needs as the Project.

During construction, water would be required intermittently for dust control, equipment cleaning, soil grading, and preparation during each phase of Alternative 4. Prior to construction, with approval from the LADWP, temporary water supply needs during construction would be obtained from existing metered water connections or fire hydrants. Therefore, Alternative 4 would not result in significant environmental effects due to the relocation or construction of new or expanded water facilities, and short-term construction impacts would be less than significant.

The anticipated Project water demand has been accounted for in the City's overall total demand projections in the LADWP 2015 UWMP, using a service area-wide approach that does not rely on individual development demand. The UWMP utilized the SCAG RTP data that provide for more reliable water demand forecasts, taking into account changes in population, housing units, and employment. Based on City Planning Department's determination that the Project is consistent with the demographic forecasts for the City, from the 2012 SCAG RTP, as shown in Section IV.O.1 of the Draft EIR, LADWP finds the Project water demand is included in the City's LADWP 2015 UWMP water demand projection. Therefore, because Alternative 4 would involve less development, it would involve less water demand, which would also be included in the UWMP water demand projection. Alternative 4 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(ii) Wastewater

Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking, and no commercial space). Alternative 4 would result in less wastewater generation than the Project, because Alternative 4 would have less floor area as compared to the Project.

As part of Alternative 4's permit process, the City would conduct detailed gauging and evaluation to identify specific sewer connection points. If additional sewer line capacity is needed to serve Alternative 4, Kaiser Permanente would be required to install adequately sized sewer lines to a point in the sewer system with sufficient capacity. Alternative 4 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(iii) Solid Waste

Similar to the Project and per AB 939, Alternative 4 would be required to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As with the Project, Alternative 4 would achieve the required source reduction and recycling rates by complying with these requirements.

Similar to the Project, construction of Alternative 4 would result in the generation of solid waste such as scrap lumber, concrete, residual wastes, packing materials, plastics, and soils. The construction and demolition debris associated with the Project would primarily be classified as inert waste and would be recycled in accordance with City of Los Angeles Ordinance 181519 (Amendment to the LAMC and LAMC Chapter VI, Article 6, Sections 66.32 through 66.32.5), at one of the City's certified processing facilities, including the Azusa Land Reclamation Landfill, which has a remaining capacity of 57,716,118 tons and remaining intake of 5,142 tpd. Other facilities that process inert waste and other construction and demolition waste in the County have a collective maximum daily capacity of 18,516 tons. In addition, numerous processing facilities for construction and demolition wastes are located throughout the County, the nearest of which is the American Reclamation CDI Processing Facility. This facility has a permitted capacity of 174 tpd and has a construction and demolition recycling rate of 85 percent. As such, any construction and demolition debris requiring disposal at an inert waste landfill would be sufficiently accommodated by existing landfills. For the reasons stated above, similar to the Project, Alternative 4 demolition and construction would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. As such, impacts would be less than significant.

The total daily intake capacity of nearby landfills is currently 26,994 tons per day, leaving a significant amount of availability even with implementation of Alternative 4. A significant amount of solid waste would be directed to the new Mesquite Landfill, which has a permitted daily intake allowance of 20,000 tons,[16] bringing additional relief to other landfills and providing another location for solid waste to be taken.

Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impacts.

(iv) Expanded Electric Power, Natural Gas, or Telecommunications Facilities

Alternative 4 would result in less development (building area) to the Project, but would result in electricity, natural gas, and telecommunications demand. Upgrades would likely be required with respect to electric power and telecommunication facilities, based on the

[16] LADWP 2019

change in land use (i.e., higher density and increase in on-site technology). Natural gas line upgrades may also be similarly required. However, such upgrades would be confined to the lateral connections to the Project Site and not any centralized facilities. This significance criterion is generally applicable to projects that are not already served by municipal utilities, or for large specific plans or greenfield developments, because it is those projects that either need to construct new electrical power, natural gas, and telecommunication centralized facilities, or that would tax existing infrastructure. Alternative 4 would result in less-than-significant impacts, which would be similar to the Project's less-than-significant impact.

(o) Energy Consumption and Conservation

Alternative 4 would result in less development as compared to the Project (a reduction in 3,000 square feet of medical space, a reduction in 342,800 square feet of parking, and no commercial space). Therefore, Alternative 4 would require less energy when compared to the Project. The Project's energy requirements would not significantly affect local and regional supplies or require additional capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would also be sufficient to meet the needs of Project-related construction and operations. Alternative 4 would result in less development as compared to the Project, and thus, would result in less energy consumption demand during construction and operation. During operations, Alternative 4 will comply with existing energy efficiency requirements such as CALGreen, as well as include energy conservation measures beyond requirements. In summary, Alternative 4's energy demands would not significantly affect available local and regional energy supplies, would comply with existing energy efficiency standards, and would not require additional capacity.

Alternative 4 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2016 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City of Los Angeles Green Building Code. With regard to transportation uses, the alternative design would reduce the VMT throughout the region and encourage use of alternative modes of transportation. Alternative 4 would be consistent with regional planning strategies that address energy conservation. As discussed above and in Section IV.I, Land Use, of this Draft EIR, SCAG's 2016–2040 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2016–2040 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources.

Alternative 4 would be consistent with the 2016–2040 RTP/SCS goals and policies. In addition, the Project would comply with state energy efficiency requirements and would use electricity from LADWP, which has a current renewable energy mix of 29 percent. All of these features would serve to reduce the consumption of electricity, natural gas, and transportation fuel. Based on the above, Alternative 4 would be consistent with adopted energy conservation plans.

Alternative 4 would result in less-than-significant impacts, which would be less than the Project's less-than-significant impacts.

(3) Comparison of Impacts

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

(4) Relationship of Alternative 4 to Project Objectives

Alternative 4 would not meet the following objectives as effectively or fully as the Project would because Alternative 4, with its reduced overall density and reduced medical space, would lessen the Project's ability to:

1. Replace existing, obsolete facilities with new, state-of-the-art medical care facilities that increase efficiency and capacity within the existing Medical Center campus, allowing for the reallocation of employed health care professionals from several functionally deficient MOBs to more conveniently serve community residents within a regional healthcare hub.

2. Expand the Medical Center campus through the construction and operation of additional new medical facilities, providing long-range health care capacity and flexibility to accommodate future growth and the changing needs of the regional population.

3. Create employment opportunities for careers in health care, including more than 800 new employment opportunities in various medical professions and through the expansion and operation of a teaching hospital.

4. Redesign the existing campus to improve the safety and efficiency of internal circulation of vehicles and pedestrians, and the functionality and accessibility of all facilities and services, including parking.

6. Environmentally Superior Alternative

State CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of the alternatives to a proposed project in an EIR shall identify an environmentally superior alternative among the alternatives evaluated and that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. Selection of an environmentally superior alternative is based on a comparison of the alternatives that would reduce or eliminate the significant impacts associated with the Project and on a comparison of the remaining environmental impacts of each alternative to the Project.

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

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

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

Therefore, Alternative 2 is the Environmentally Superior Alternative, because it would reduce the number of Building Sites where development would occur, and it would result in the fewest impacts when compared to the Project. Alternative 2 would only partially meet the Project objectives because the reduction in the proposed building areas would

be a loss in existing capacity and service, would result in a proportional loss in member and community access to proximate and critical hospital services and clinical healthcare in the community where they live, and would erode Kaiser Permanente's ability to adjust to changes in healthcare service delivery by increasing spatial constraints.

TABLE V-5
COMPARISON OF IMPACTS UNDER THE PROJECT TO IMPACTS UNDER THE ALTERNATIVES

Environmental Issue	Project Impact	Alternative 1: No Project/ No Build	Alternative 2: Development Under Existing Zoning	Alternative 3: Reduced Intensity Alternative	Alternative 4: Reduced Intensity and Parking Alternative
Air Quality					
Air Quality Management Plan	Less than Significant	Less (no impact)	Less (less than significant)	Less (less than significant)	Less (less than significant)
Construction Emissions	Less than Significant	Less (no impact)	Less (less than significant)	Less (less than significant)	Less (less than significant)
Operational Emissions	Less than Significant	Less (no impact)	Less (less than significant)	Less (less than significant)	Less (less than significant)
Sensitive Receptors	Less than Significant	Less (no impact)	Less (less than significant)	Less (less than significant)	Less (less than significant)
Odors	Less than Significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Biological Resources					
Biological Resources	Less than Significant with Mitigation	Less (less than significant)	Similar (less than significant with mitigation)	Similar (less than significant with mitigation)	Similar (less than significant with mitigation)
Cultural Resources					
Historical Resources	Less than Significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)

TABLE V-5
COMPARISON OF IMPACTS UNDER THE PROJECT TO IMPACTS UNDER THE ALTERNATIVES

Environmental Issue	Project Impact	Alternative 1: No Project/ No Build	Alternative 2: Development Under Existing Zoning	Alternative 3: Reduced Intensity Alternative	Alternative 4: Reduced Intensity and Parking Alternative
Archaeological Resources	Less than Significant with Mitigation	Less (less than significant)	Similar (less than significant with mitigation)	Similar (less than significant with mitigation)	Similar (less than significant with mitigation)
Human Remains	Less than Significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Geology and Soils					
Alquist-Priolo Earthquake Fault, Ground Shaking, Liquefaction, Settlement, Landslides	Less than Significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Erosion/ Loss of Topsoil	Less than Significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Geologic Instability	Less than Significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Expansive Soils	Less than Significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Septic Tanks	Less than Significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Geologic Feature or Paleontological Resource	Less than Significant with Mitigation	Less (less than significant)	Similar (less than significant with mitigation)	Similar (less than significant with mitigation)	Similar (less than significant with mitigation)
Greenhouse Gas Emissions					
Greenhouse Gas Emissions	Less than Significant	Less (no impact)	Less (less than significant)	Less (less than significant)	Less (less than significant)

TABLE V-5
COMPARISON OF IMPACTS UNDER THE PROJECT TO IMPACTS UNDER THE ALTERNATIVES

Environmental Issue	Project Impact	Alternative 1: No Project/ No Build	Alternative 2: Development Under Existing Zoning	Alternative 3: Reduced Intensity Alternative	Alternative 4: Reduced Intensity and Parking Alternative
Applicable Plan or Policy	Less than Significant	Less (no impact)	Less (less than significant)	Less (less than significant)	Less (less than significant)
Hazards and Hazardous Materials					
Routine Transport, Use, or Disposal of Hazardous Materials	Less than Significant with Mitigation	Less (less than significant)	Similar (less than significant with mitigation)	Similar (less than significant with mitigation)	Similar (less than significant with mitigation)
Upset Conditions Involving the Release of Hazardous Materials	Less than Significant with Mitigation	Less (less than significant)	Similar (less than significant with mitigation)	Similar (less than significant with mitigation)	Similar (less than significant with mitigation)
Emit Hazardous Materials Near Schools	Less than Significant with Mitigation	Less (less than significant)	Similar (less than significant with mitigation)	Similar (less than significant with mitigation)	Similar (less than significant with mitigation)
Hazardous Materials Site	Less than Significant with Mitigation	Less (less than significant)	Similar (less than significant with mitigation)	Similar (less than significant with mitigation)	Similar (less than significant with mitigation)
Emergency Response/Evacuation Plan	Less than Significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Hydrology and Water Quality					
Water Quality Standards	Less than Significant with Mitigation	Less (no impact)	Similar (less than significant with mitigation)	Similar (less than significant with mitigation)	Similar (less than significant with mitigation)
Groundwater	Less than Significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)

TABLE V-5
COMPARISON OF IMPACTS UNDER THE PROJECT TO IMPACTS UNDER THE ALTERNATIVES

Environmental Issue	Project Impact	Alternative 1: No Project/ No Build	Alternative 2: Development Under Existing Zoning	Alternative 3: Reduced Intensity Alternative	Alternative 4: Reduced Intensity and Parking Alternative
Onsite Flooding	Less than significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Sustainable Groundwater Management Plan	Less than significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Land Use and Planning					
Land Use Plan Consistency	Less than significant	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Noise					
Noise in Excess of Standards	Significant and Unavoidable	Less (no impact)	Less (significant and unavoidable)	Similar (significant and unavoidable)	Similar (significant and unavoidable)
Excessive Groundborne Vibration or Noise	Significant and Unavoidable	Less (no impact)	Less (significant and unavoidable)	Similar (significant and unavoidable)	Similar (significant and unavoidable)
Population and Housing					
Population Growth	Less than Significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Less (less than significant)
Public Services					
Fire Protection Services	Less than Significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Police Protection Services	Less than Significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Schools	Less than Significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)

TABLE V-5
COMPARISON OF IMPACTS UNDER THE PROJECT TO IMPACTS UNDER THE ALTERNATIVES

Environmental Issue	Project Impact	Alternative 1: No Project/ No Build	Alternative 2: Development Under Existing Zoning	Alternative 3: Reduced Intensity Alternative	Alternative 4: Reduced Intensity and Parking Alternative
Parks and Recreation	Less than Significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Library Services	Less than Significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Transportation					
Conflict with an Applicable Program	Less than Significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Vehicle Miles Traveled	Less than Significant	Less (no impact)	Less (less than significant)	Less (less than significant)	Less (less than significant)
Traffic Hazards	Less than Significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Inadequate Emergency Access	Less than Significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Tribal Cultural Resources					
Tribal Cultural Resources	Less than Significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Utilities and Services Systems					
Water	Less than Significant	Less (no impact)	Less (less than significant)	Less (less than significant)	Less (less than significant)
Wastewater	Less than Significant	Less (no impact)	Less (less than significant)	Less (less than significant)	Less (less than significant)
Solid Waste	Less than Significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)

TABLE V-5
COMPARISON OF IMPACTS UNDER THE PROJECT TO IMPACTS UNDER THE ALTERNATIVES

Environmental Issue	Project Impact	Alternative 1: No Project/ No Build	Alternative 2: Development Under Existing Zoning	Alternative 3: Reduced Intensity Alternative	Alternative 4: Reduced Intensity and Parking Alternative
Expanded Electric Power, Natural Gas, or Telecommunications Facilities	Less than Significant	Less (no impact)	Similar (less than significant)	Similar (less than significant)	Similar (less than significant)
Energy Consumption and Conservation					
Energy Consumption and Conservation	Less than Significant	Less (less than significant)	Less (less than significant)	Less (less than significant)	Less (less than significant)