VI. Other CEQA Considerations

1. Significant Unavoidable Impacts

Section 15126.2(b) of the State California Environmental Quality Act (CEQA) Guidelines requires than an Environmental Impact Report (EIR) describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

> Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in significant and unavoidable impacts related to ground-borne noise and vibration during construction. All other impacts associated with the Project would be less than significant or reduced with mitigation to less than significant.

a) Noise

(1) Construction Noise

As discussed in Section IV.J, Noise, of this Draft EIR, construction equipment is anticipated to be used for all phases of Project development and would generate construction noise. Construction noise levels would exceed the applicable significance thresholds for construction in the L.A. CEQA Thresholds Guide if the Project would exceed existing ambient exterior noise levels by 5 decibels A-weighted (dBA) or more at a noise-sensitive use at all of the modeled sites. Predicted construction noise levels at the nearest residences (Site 1) range from approximately 84 dBA noise level equivalent (L_{eq}) during the architectural coatings phase to 98 dBA L_{eq} during demolition. At other sites, such as Site 6, construction noise levels would be nearly as loud at adjacent residential uses. At the western side of Barnsdall Art Park and at residences to the west, construction noise levels from Site 4 would be 60 to 72 dBA L_{eq} when construction takes place along the northern side of the Project Site. At the eastern side of Barnsdall Art Park and at residences to the east, construction noise levels from Site 5 would be approximately 57 to 69 dBA L_{eq} when construction takes place along the northern side of the Project Site.

The temporary noise levels from construction shown in Table IV.J-10 (see Section IV.J, Noise, of this Draft EIR) would represent a substantial increase above existing ambient levels. Additionally, the estimated noise levels would exceed the noise standard in Los Angeles Municipal Code (LAMC) Section 112.05 of 75 dBA at a distance of 50 feet for construction within 500 feet of any residential zone. Therefore, temporary noise impacts associated with the Project's on-site construction would be significant.

Implementation of Project Design Feature **PDF-NOI-1** would ensure that all construction equipment is equipped with properly operating and maintained mufflers and silencers, idling equipment is shut off, electricity from power poles and/or solar powered generators is used, the distance between construction equipment staging areas and occupied sensitive receptor areas is maximized, and temporary noise barriers or noise blankets around stationary construction noise sources are used. Mitigation Measure **MM-NOI-1** requires the construction of temporary noise barriers.

Even with the implementation of Mitigation Measure **MM-NOI-1**, it is likely that noise from construction would still exceed the City of Los Angeles' (City) significance thresholds for construction in the L.A. CEQA Thresholds Guide, would exceed the noise standard in LAMC, and would result in a substantial noise increase above ambient noise levels. Therefore, noise from construction, though temporary, is considered to be a significant and unavoidable impact.

While construction noise impacts would be temporarily significant and unavoidable, construction noise levels fluctuate throughout a given workday as construction equipment is moved from one location to another within a project site. When construction equipment would be in use further away from a sensitive receptor location, construction noise levels would be lower than the calculated values provided herein, which assumes construction equipment would be in use nearest to a sensitive receptor location.

(2) Construction Vibration

(a) Structural Damage

As discussed in Section IV.J, Noise, of this Draft EIR, construction of the proposed Project would result in groundborne vibration from heavy equipment, including bulldozers, backhoes, rollers, cranes, pile drillers, graders, concrete mixers, and paving equipment. Based upon data from the Federal Transit Administration (FTA), large tracked heavy equipment, such as excavators, loaders, and bulldozers, can produce vibration levels of 0.089 inches per second peak particle velocity (PPV) at a reference distance of 25 feet. Loaded haul trucks and delivery vehicles on the construction site can produce vibration levels of 0.076 inches per second PPV at this distance. Table IV.J-13 (see Section IV.J, Noise, of this Draft EIR) shows the estimated building damage

from vibration impacts that could be experienced by buildings in the vicinity of the building sites as a result of the Project's construction activities. As shown in the table, Project-related 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. Conventional construction activities (i.e., the use of large bulldozers and similar heavy equipment) would exceed FTA vibration thresholds when conducted adjacent to sensitive receivers. Therefore, vibration impacts during construction of the Project to off-site building structures would be significant.

(b) Human Annoyance

As discussed in Section IV.J, Noise, of this Draft EIR Project-related 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). Additionally, conventional construction activities are estimated to result in vibration levels exceeding the FTA impact criteria for human annoyance for passengers at the adjacent Los Angeles County Metropolitan Transportation Authority (Metro) B (Red) Line tunnel and station. Project Design Feature **PDF-NOI-2** (which requires the installation of vibration monitors, implementation of strategies to reduce vibratory impacts, and establishment of protocols for inspections and remediation in the event of exceedance of specified vibration levels) and LAMC Section 112.05, which sets a maximum noise level for construction equipment would reduce the potential for human annoyance from construction activities. However, because of the relatively high estimated levels at nearby sensitive uses, it is unlikely that such measures would be adequate to reduce vibration impacts to below a level of significance. Therefore, vibration impacts associated with the proposed Project during construction are considered significant and unavoidable.

(3) Cumulative Noise

The Project and the related projects would all be subject to applicable noise standards (descriptions of the standards applicable within the City are described throughout this section). However, construction noise and vibration from Project construction would exceed applicable standards, and temporary impacts would be significant and unavoidable. Therefore, the Project would contribute to temporary cumulative exceedances of noise and vibration standards, and its incremental effect would be cumulatively considerable.

The proposed Project would result in temporary noise increases during the construction period. The proposed Project's construction period would have the potential to overlap with the related projects' construction processes. The nearest related projects, numbers 23 and 5, are located within approximately 200 and 800 feet, respectively, of the proposed

building sites. The remainder of the related projects are approximately 1,000 feet or more from the proposed building sites. However, temporary and periodic increases in ambient noise levels would be significant and unavoidable. Therefore, the Project's contribution to temporary cumulative increases in ambient noise levels would be cumulatively considerable, and cumulative impacts would be significant.

Mitigation Measure **MM-NOI-1** requires the construction of temporary noise barriers. Even with the implementation of Mitigation Measure **MM-NOI-1**, it is likely that noise from construction of the Project, in conjunction with the related projects, would still exceed the City of Los Angeles' significance thresholds and would result in a substantial noise increase above ambient noise levels. Therefore, noise and vibration from construction, though temporary, would be cumulatively considerable and is considered to be a significant and unavoidable impact.

2. Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts

In addition to identification of a project's significant unavoidable impacts, Section 15126.2(b) of the State CEQA Guidelines states that where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

As discussed above, the Project would result in significant and unavoidable impacts related to ground-borne noise and vibration during construction. The Project's significant ground-borne noise and vibration impacts would occur during construction for limited durations from the operation of construction equipment. Such impacts would cease upon completion of certain construction activities. Nevertheless, four alternatives to the Project were considered in Section V, Alternatives, of this Draft EIR. As discussed herein, significant construction noise and vibration impacts would be expected to occur with any development scenario because of the use of construction equipment, including bulldozers, backhoes, rollers, cranes, pile drivers, graders, concrete mixers, and paving equipment, and the close proximity to residences and MTA's B Line tunnel and station. Alternatives, except Alternative 1: No Project/No Build, would still require the use of construction equipment in order for construction activities to take place on-site. Due to the proximity of sensitive receptors, any use of construction equipment would result in significant impacts. Thus, reducing temporary construction noise and vibration to below a level of significance is infeasible. Furthermore, any reduction in the intensity of construction activities on an hourly or daily basis would increase the construction period and prolong construction noise. Additionally, among alternatives considered, no feasible alternative was identified that would eliminate the Project's significant and unavoidable noise and vibration impacts with the exception of Alternative 1: No Project/No Build.

Although Alternative 1 would avoid the Project's significant and unavoidable impacts, Alternative 1 would not meet the underlying purpose of the Project or any of the Project objectives; therefore, it is not considered a feasible development alternative. As discussed in Section V, Alternatives, of this Draft EIR, the Project, as proposed, satisfies the Project objectives to a substantially greater degree than any of the proposed alternatives. This Draft EIR also includes mitigation measures that reduce the potential impacts associated with the Project to the extent feasible.

As discussed in Section III, Project Description, of this Draft EIR, the Project would expand the existing Kaiser Permanente Los Angeles Medical Center (Medical Center) campus by replacing facilities and adding new buildings. The Medical Center campus currently contains buildings that have become outdated, with facilities and technology that are no longer adequate to meet long-term needs of the Hollywood community and surrounding communities served by the Medical Center campus. The Project would allow Kaiser Permanente to expand the Medical Center campus, improve the campus with updated medical innovations and technology, and replace existing structures with updated buildings. These improvements would enhance and support Kaiser's ability to deliver healthcare services to the community.

Kaiser Permanente is also proposing to build new healthcare facilities on adjacent parcels of land to meet projected member healthcare service demands. The Project would provide high-quality health care in seismically safe, state-of-the-art medical center facilities for Kaiser Permanente members throughout the City of Los Angeles area and surrounding communities. The new healthcare facilities would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen). These standards would reduce energy use, water use, waste generation, and greenhouse gas (GHG) emissions, and would minimize impacts on natural resources and infrastructure.

The proposed buildings would also be designed and constructed to incorporate environmentally sustainable design features equivalent to a minimum Silver certification under the U.S. Green Building Council's Leadership in Environmental and Energy Design (LEED) Rating System, or other equivalent green building standards. Such LEED features would include energy-efficient structures, a pedestrian- and bicycle-friendly site design, and water conservation measures. LEED standards would be incorporated in order to reduce energy and water usage, and thus, would minimize associated GHG emissions. The proposed Project would incorporate an environmentally sustainable design using green building technologies as identified in the principles for energy efficiency, water conservation, environmentally preferable building materials, and overall waste reduction. Sustainability features of the Project

are detailed in Chapter III, Project Description, of this Draft EIR. The Project Site is located within a Transit Priority Area and is well-located to facilitate pedestrian activity, bicycle use, and public transit use. The Medical Center campus is situated across the street from the B Line Vermont Metro station, located at the northeast corner of the Vermont Avenue/Sunset Boulevard intersection. The Medical Center campus is also within walking distance of retail, restaurant, and other commercial businesses located along Vermont Avenue, Hollywood Boulevard, and Sunset Boulevard. Further, regional and local public bus transit stops are provided throughout the campus along Vermont Avenue, Hollywood Boulevard, and Sunset Boulevard, as well as along other nearby roadways. Public bus transit service in the Project area is provided by Metro and the City of Los Angeles Department of Transportation (DASH and Commuter Express transit services). The Project's proximity to a subway station and a variety of bus stops would facilitate use of transit to access the Project Site. The Project would thereby focus growth along major transportation corridors and within walking distance of a transit station. As such, the Project aligns with the General Plan goals and policies that provides increased services for the surrounding community an area accessible by transit options.

Further, the Project implements the guideing principles and objectives established for the Project, as shown in Chapter III, Project Description. The approval of the Project would also result in increased property tax revenue for the City as well as additional employment opportunities within the City and Hollywood Community Plan neighborhood. By increasing the number of jobs and healthcare services in proximity to an area of increasing residential density, the Project aids in reducing vehicle miles traveled and GHG emissions.

As discussed in Section V, Alternatives, of this Draft EIR, the Project satisfies the Project Objectives to a greater degree than any of the proposed alternatives. This Draft EIR also includes mitigation measures that reduce the potential impacts associated with the Project to the extent feasible. Overall, the Project presents several benefits that override the limited adverse effects it may have on the environment.

3. Significant Irreversible Environmental Changes

Section 15126.2(c) of the State CEQA Guidelines indicates that an EIR should evaluate significant irreversible environmental changes that would be caused by implementation of a proposed project. As stated in State CEQA Guidelines Section 15126.2(c):

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future

> generations to similar uses. Irreversible damage can also result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The Project would necessarily consume a limited amount of slowly renewable and nonrenewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of slowly renewable and nonrenewable resources that would include (1) building materials, (2) water, and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. However, as demonstrated below, the Project would not consume a large amount of natural resources or result in significant irreversible environmental changes.

a) Building Materials and Solid Waste

Construction of the Project would require consumption of resources that do not replenish themselves or which may renew so slowly as to be considered nonrenewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics).

Solid Waste is addressed Section IV.O.3, Utilities and Service Systems – Solid Waste, Electric Power, Natural Gas, and Telecommunications, of this Draft EIR. During construction of the Project, in compliance with Assembly Bill (AB) 939, a minimum of 50 percent of construction debris will be recycled. During operation, the Project would implement a zero waste goal for operational activities. It would also provide on-site recycling containers within a designated recycling area for Project residents to facilitate recycling in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No.171687) and the Los Angeles Green Building Code. In accordance with AB 1826, the Project would also provide for the recycling of organic waste. The Project will adhere to State and local solid waste policies and objectives that further goals to divert waste. Thus, the consumption of nonrenewable building materials such as lumber, aggregate materials, and plastics would be reduced to less-than-significant impacts.

b) Water

Consumption of water during construction and operation of the Project is addressed in Section IV.O.1, Utilities and Service Systems – Water Supply and Infrastructure, of this Draft EIR. As evaluated therein, Option A and Option B would result in an increase in domestic water demand of 124,771 gallons per day (gpd) (140 acre-feet per year [AFY])

and 99,193 gpd (111 AFY), respectively. Additionally, the maximum of 140 AFY increase in net water demand of the proposed Project through the year 2040, fits within the Los Angeles Department of Water and Power's projection of growth and water demand totals throughout normal, single-dry, and multiple-dry years. With regards to water infrastructure, a part of the building permit process requires that the City confirm sufficient capacity in the water supply infrastructure to accommodate the Project's water needs. If a deficiency or service problem is discovered during the permitting process and prevents the Project from an adequate level of service, Kaiser Permanente would be required to fund upgrades to the water supply infrastructure to adequately serve the Project. Project design features **PDF-HYD-2** through **PDF-HYD-10** includes water conservation measures and regulatory compliance measures to ensure existing and planned future water demands are met. Thus, as evaluated in Section IV.O.1, Utilities and Service Systems – Water Supply and Infrastructure, of this Draft EIR, while the Project would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

c) Energy Consumption

During ongoing operation of the Project, nonrenewable fossil fuels would represent the primary energy source, and thus the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Project consumption of nonrenewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.P, Energy Consumption and Conservation, of this Draft EIR. As discussed therein, construction and operation of the Project would not result in an increase in the demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would also be sufficient to meet the needs of Project-related construction and operations.

During construction, the proposed Project is estimated to consume approximately 431,985 gallons of diesel and 90,927 gallons of gasoline during the construction phase. For comparison purposes, the fuel usage during Project construction would represent approximately 0.07 percent of the 2019 annual on-road diesel energy consumption and 0.002 percent of the 2019 annual gasoline energy consumption in Los Angeles County, as shown in Appendix M, of this EIR.

Once operational, the Project's buildout energy demand would be a net increase of 1,533,820 kilowatt-hours of electricity per year, and a net decrease of a) 58,640 therms of natural gas per year, b) 650,535 gallons of gasoline per year, and c) 41,390 gallons of diesel fuel per year. In addition to complying with CALGreen, the Project will also implement Project Design Features **PDF-GHG-1**, **PDF-AIR-4, PDF-TRF-2, PDF-HYD-1** through **PDF-HYD-10,** and **PDF-SW-1** and **PDF-SW-2**, presented in Section IV.P, Energy, of this Draft EIR. These measures would further reduce the Project's energy demand. In addition, the Los Angeles Department of Water and Power is required to procure at least 33 percent of its energy portfolio from renewable sources by 2020.

At buildout, Project operation would consume a total of 650,535 gallons of gasoline and a total of 41,390 gallons of diesel per year, or a total of 691,925 gallons of petroleum-based fuels per year. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately 0.02 percent of the 2017 annual on-road gasoline and approximately 0.11 percent of the annual on-road diesel-related energy consumption in Los Angeles County, as shown in Appendix M. As a result, petroleum usage caused by the Project would not likely have a significant effect on local and regional energy supplies or require additional capacity. Further, the Project design would reduce the vehicle miles traveled throughout the region and encourage use of alternative modes of transportation.

During operations, the Project will comply with existing energy efficiency requirements such as CalGreen, as well as include energy conservation measures beyond the requirements. Additionally, the proposed buildings would also be designed and constructed to incorporate environmentally sustainable design features equivalent to a minimum Silver certification under the U.S. Green Building Council's LEED Rating System, or other equivalent green building standards. Therefore, Project impacts related to energy use would be less than significant during construction and operation. Refer to Section IV.P, Energy Consumption and Conservation, of this Draft EIR, for further analysis regarding the Project's consumption of energy resources.

d) Environmental Hazards

The Project's potential use of hazardous materials is addressed in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR. No underground storage tanks (USTs) were identified on Site 1 (Appendix F-3); however, this was a limited assessment, and based on the historical use of the Project Site, any future redevelopment of the Project should include the possibility of encountering/assessing USTs, piping, dispensers, and/or any

other UST system component.[1] Therefore, exposure of workers or the public to contaminated soils during construction activities would be a significant impact.

As discussed in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, the Project would not cause significant upset at Sites 2, 3, 4, 5, and 6 due to release from a UST. Nearly all the nearby leaking underground storage tank (LUST) sites have received regulatory case closure. There is one open LUST cleanup site at 1630 North Vermont, approximately 500 feet northeast of Site 5. The Regional Water Quality Control Board approved a revised Remedial Action Plan in October 2018 to address fuel hydrocarbons in soil and groundwater at the site. Thus, the building sites would not be impacted by the LUST cleanup site.

Due to the historical use of the Site 1, there is the possibility of encountering USTs, and thus, preparation of a soil management plan is required prior to excavation and development activities. As evaluated therein, a variety of hazardous substances and wastes would be stored, used, and generated on the Project Site during construction activities at Site 1. However, during all construction activities, Kaiser Permanente would prepare and implement a hazardous substance management, handling, storage, disposal, and emergency response plan.

Additionally, demolition activities associated with the Project would expose workers and/or the general public to lead-based paints, asbestos-containing materials, and polychlorinated biphenyls (PCBs). The Project would be required to comply with all applicable regulations pertaining to hazardous materials, and therefore the use of these materials during demolition and construction would not pose a significant threat to the environment. Further, a PCB Waste Characterization, Segregation, Disposal and Reuse Plan (Mitigation Measure **MM-HAZ-1**) for submission to the U.S. Environmental Protection Agency Region 9 would be prepared for the Project. The plan will serve as notification and certification, as required, for the self-implementing cleanup and disposal as defined in 40 CFR 761.61(a).

As discussed in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, the Phase I Environmental Site Assessment (ESA) and Phase II ESA conducted for Site 1 identified volatile organic compounds which appeared to be associated with former historical gasoline/fueling operations. Due to the VOC impacts observed in soil and soil vapor during the Additional Subsurface Assessment Report conducted for this site, the potential for vapor intrusion was determined to exist. Therefore, the Project could result in the accidental release of contaminated soils, if uncovered during excavation and

[1] Site 1: Stantec, Phase II Environmental Site Assessment 1321, 1329, 1345 North Vermont, and 1328 North New Hampshire Avenue, Los Angeles, California 90027, April 19, 2016, provided in Appendix F-1 of this Draft EIR.

construction on Site 1. Based on the recommendations included in the Additional Subsurface Assessment Report, Kaiser Permanente must provide the results of the subsurface investigation to the Los Angeles Regional Water Quality Control Board to determine what additional actions, if any, may be required. In addition, Kaiser Permanente must prepare a soil management plan for Site 1 prior to excavation and redevelopment activities to address the potential discovery of contaminated soils during construction (Mitigation Measure **MM-HAZ-3**). The purpose of the soil management plan is to provide guidance to project management, site management, and field personnel on the identification and management of soil that is impacted and clean, to segregate and stockpile impacted soil, and remove and dispose of it at a disposal facility licensed to accept such soil in accordance with all applicable regulations, and construction debris during excavation, grading, and construction activities to be completed at Site 1.

The Project involves the operation of medical office buildings, parking structures, and associated infrastructure improvements. It is assumed that routine landscaping and building maintenance, as well as hospital uses, would involve the transport, use, or disposal of hazardous materials on- or off-site. Pursuant to the State of California Medical Waste Management Act of 1990, Kaiser Permanente is required to prepare a medical waste management plan for submittal to the California Department of Public Health. Additionally, in accordance with California Health and Safety Code, Article 1, Chapter 6.95 for the business emergency plan, Kaiser Permanente must also prepare a hazardous materials business plan for submittal to the California Environmental Reporting System.

Compliance with applicable regulations regarding the remediation and disposal of hazardous materials, along with implementation of the identified mitigation required for the Project, would serve to protect against significant and irreversible change resulting from the accidental release of hazardous materials.

e) Conclusion

Based on the above, Project construction and operation would require the irreversible commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these resources and the Project Site for future generations or for other uses. However, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions, and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant, and the limited use of nonrenewable resources that would be required by Project construction and operation is justified.

4. Growth-Inducing Impacts

Section 15126.2(e) of the State CEQA Guidelines requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the State CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a wastewater treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the State CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The State CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. The State CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

a) Population

As discussed in Section IV.K, Population and Housing of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, most construction workers would not be expected to relocate their households as a consequence of the construction job opportunities presented by the Project. Therefore, the construction employment generated by the Project would not result in a notable increase in the resident population and would not induce unplanned substantial population growth.

The Project would result in a net increase of square footage of nonresidential floor area. The Project would not include a residential component, and thus would not directly generate population growth. However, the Project would result in a net increase in square footage of nonresidential floor area, which would generate increased employment opportunities, which in turn could generate population growth.

As previously shown in **Table III-1** (see Chapter III, Project Description, of this Draft EIR), the Project would result in a net increase in 570,462 square feet and 602,462 square feet in building and parking square footage under Option A and Option B, respectively. Based on communication with the Los Angeles Medical Center Service Delivery Team and the existing building square footage, the estimated employee-to-building square footage ratio is 3 employees per 1,000 square feet. Conservatively, using the larger net increase of 602,462 in building square footage under Option B, the Project would result in approximately 1,807 new employees under the 2030 buildout.

As previously shown in **Table IV.K-1** (see Section IV.K, Population and Housing, of this Draft EIR), the City is projected add 128,924 employees from the 2017 baseline year to 2030 (Project buildout year). As such, the Project's approximately 1,807 new employees would represent 1.4 percent of new employment projected in the City of Los Angeles Southern California Association of Governments (SCAG) subregion between 2017 and 2030 (Project buildout). Thus, the increase in employment anticipated with implementation of the proposed Project would not exceed the employment forecast provided by SCAG for the City of Los Angeles subregion. Further, the proposed Project is not expected to lead to a significant corresponding increase in population or households. Given the available labor pool in the City and the region, a majority of these employees would not be expected to relocate to the area solely for the purpose of being close to the Project Site, thereby creating additional demand for housing in the Project Site area.

Therefore, the Project would not result in significant impacts related to direct or indirect population growth. In addition, the Project does not involve the extension of roadways or infrastructure. Thus, the Project would not induce substantial population growth indirectly through the extension of roads or other infrastructure.

b) Employment

The Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout. However, because the Project would be implemented in three phases between 2020 to 2030 and most, if not all, of the construction workers would not be needed continuously and only for varying portions of the Project phases, it is reasonable to assume that construction workers would work on construction sites, and on the Project Site, on a temporary basis only and, thus, are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. As such, the construction employment generated by the Project would not result in a notable increase in the resident population and would not induce unplanned substantial population growth.

The proposed expansion of the Medical Center would generate increased employment opportunities, which could indirectly generate population growth. As previously shown in Table III-1 (see Chapter III, Project Description, of this Draft EIR), the Project would result in a net increase in 570,462 square feet and 602,462 square feet in building and parking square footage under Option A and Option B, respectively. Based on communication with the Los Angeles Medical Center Service Delivery Team[2] and the existing building square footage, the estimated employee to building square footage ratio is 3 employees per 1,000 square feet. Conservatively, using the larger net increase of 602,462 in building square footage under Option B, the Project would result in approximately 1,807 new employees under the 2030 buildout.

[2] M.A. Hesse, A0147: LAMC Aesthetics – Net Growth Staff Increase, May 29, 2019.

SCAG's forecast for the City of Los Angeles indicates an estimated employment increase by 128,924 employees or 6.9 percent from the 2017 baseline year to 2030 Project buildout year. As such, the Project's approximately 1,807 new employees would represent 1.4 percent of the new employees projected in the SCAG Region between 2017 and 2030 (Project buildout). Thus, the Project's employment growth would fall within the forecasted employment growth for the City, and the Project would not represent a substantial or significant growth as compared to the projected employment growth for the City.

c) Utility Infrastructure Improvements

The area surrounding the Project Site is already developed with medical and hospital, commercial, and residential uses, which would not be removed or disturbed as a result of the Project. Thus, the Project would not remove impediments to growth, such as extending infrastructure into an area that has been undeveloped. Additionally, the Project would not require any major roadway developments, which could stimulate urban sprawl. The Project Site is located within an urban area that is currently served by existing utilities and infrastructure. As stated in Section IV.O.1, Utilities and Service Systems – Water Supply, through Section IV.O.4, Utilities and Service Systems – Electric Power, Natural Gas, and Telecommunications, of this Draft EIR, while the Project may require minor local infrastructure upgrades to maintain and improve water, sewer, electricity, and natural gas lines on site and in the immediate vicinity of the Project Site, such improvements would be limited to serving Project-related demand, and would not necessitate major local or regional utility infrastructure improvements that have not otherwise been accounted and planned for on a regional level. Therefore, the Project would not indirectly induce growth through extension of infrastructure.

d) Conclusion

Overall, the Project would be consistent with the growth forecast for the City of Los Angeles Subregion and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicles miles traveled. In addition, the Project Site is in a highly urbanized area and is surrounded by a mix of residential uses, commercial uses, and existing Kaiser Permanente buildings and parking. Given the developed nature of the surrounding area, the proposed utility connections and utility infrastructure would not induce population growth by removal of impediments to growth (e.g., constructing utility infrastructure and service systems in a previously undeveloped region). Further, the proposed Project's infrastructure plan would support the development of the proposed Project and would not accommodate the growth beyond what is proposed. The Project would not require any major roadway improvements, nor would the Project open any large undeveloped areas for new use. Any access

improvements would be limited to driveways necessary to provide immediate access to the Project Site and to improve safety and walkability. Therefore, direct and indirect growth-inducing impacts would be less than significant.

5. Potential Secondary Effects of Mitigation Measures

Section 15126.4(a)(1)(D) of the State CEQA Guidelines states that "if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." With regard to this section of the State CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project was reviewed. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the proposed mitigation measures, listed by environmental issue area.

a) Cultural Resources

Mitigation Measure **MM-CUL-1** requires that in the event of an inadvertent discovery of an archaeological resource, all construction work occurring within 100 feet of the find immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Mitigation Measure **MM-CUL-1** is proposed to reduce the potential impact associated with archaeological resources. These mitigation measures are procedural actions that would not result in physical changes in the environment that could result in secondary impacts.

b) Hazards and Hazardous Materials

Mitigation Measure **MM-HAZ-1** would require preparation of a PCB Waste Characterization, Segregation, Disposal and Reuse Plan for submission to U.S. Environmental Protection Agency Region 9 to reduce construction-related impacts to a less-than-significant level. Mitigation Measure **MM-HAZ-2** requires a hazardous substance management, handling, storage, disposal, and emergency response plan to ensure all construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials, would be removed to a waste facility permitted to treat, store, or dispose of such materials. These mitigation measures are required to reduce potential impacts related to the transport, use, or disposal of hazardous materials during construction and are short-term in nature. As such, implementation of these mitigation measures would not result in adverse long-term secondary impacts.

In addition, Mitigation Measure **MM-HAZ-3** requires Kaiser Permanente to prepare a soil management plan for Site 1 prior to excavation and redevelopment activities. In addition, Kaiser Permanente would implement Mitigation Measure **MM-HAZ-4**, which requires the incorporation of a vapor barrier into the new building plans if potential vapor encroachment conditions are indicated or suspected during construction. Incorporation of a vapor barrier would protect future occupants from impacted soils. Upon implementation of Mitigation Measures **MM-HAZ-3** and **MM-HAZ-4**, impacts related to hazards and hazardous materials would be less than significant. These mitigation measures are procedural actions that would not result in physical changes in the environment that could result in secondary impacts.

c) Geology and Soils

Mitigation Measure **MM-GEO-1** requires Kaiser Permanente to retain a qualified paleontologist prior to commencement of grading activities, in the event paleontological resources are discovered during grading. This mitigation measure represents a procedural action and would be beneficial in protecting paleontological resources that could potentially be encountered on site. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

d) Noise

Mitigation Measures **MM-NOI-1** would require construction of temporary noise barriers at Project boundaries adjacent to the nearest residential land uses. This mitigation measure would be short term and would be required to reduce impacts related to construction noise to a less-than-significant level. Therefore, implementation of this mitigation measure would not result in adverse long-term secondary impacts.

6. Effects Not Found To Be Significant

Section 15128 of the State CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. An Initial Study was prepared for the Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City of Los Angeles determined through the Initial Study that the Project would not have the potential to cause significant impacts related to agricultural and forestry resources; biological resources, including substantial adverse impact to special-status species, natural communities, and wetlands, or potential conflicts with habitat conservation plans and natural community conservation plans; geology and soils—soils to support septic

tanks; hazards and hazardous materials, including hazards related to airport or airstrips and wildfire; hydrology and water quality, including flood hazard areas; land use—division of an established community; mineral resources; noise—airport noise and private airstrip noise; and population and housing—displacement of housing or people. A summary of the analysis provided in Appendix A for these issue areas is provided below.

a) Agriculture and Forestry Resources

The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.[3] The Project Site and surrounding area are not zoned for agricultural and forest uses. Furthermore, the Project Site is fully developed and urbanized. Therefore, the Initial Study (Appendix A) concluded that no impacts to agriculture or forestry resources would occur.

b) Biological Resources

The Project Site is located in a highly urbanized area and is developed with parking areas and medical office buildings. There is limited ornamental landscaping on the site. Based on the disturbed and developed condition of the site and the relative lack of suitable habitat, the potential for any known sensitive species to occur on the site is very low, as the Project Site and the Project vicinity are highly urbanized with few natural areas that could support wildlife. In addition, there are no riparian habitat areas nor wetlands located on or within the vicinity of the Project Site.[4,5] Vegetation on the site consists of sparse ornamental plantings that do not constitute a sensitive natural community. Furthermore, the Project area is not within any of the regional conservation plans designated by the State.[6] Therefore, the Initial Study (Appendix A) concluded no impacts to special-status species, natural communities, wetlands, and habitat conservation plans would occur.

c) Geology and Soils

The Project would use the regional sewer system for disposal of wastewater, and therefore, it would not require septic tanks or other alternative wastewater disposal systems. As such, the Initial Study (Appendix A) determined no impacts related to soils ability to support a septic tank or alternative wastewater disposal system would occur.

[3] California Department of Conservation, Farmland Mapping and Monitoring Program, April 2016.
[4] U.S. Fish and Wildlife Service, National Wetlands Inventory Wetlands Mapper, July 7, 2017.
[5] City of Los Angeles, Hollywood Community Plan, December 13, 1988.
[6] California Department of Fish and Wildlife, List of California Natural Diversity Database (CNDDB) Species for Hollywood and Los Angeles Quads (Quarter-Mile Buffer around Project Site), January 21, 2016.

d) Hazards and Hazardous Materials

The nearest public airport is the Hollywood Burbank Airport, located approximately 8 miles northwest of the Project Site.[7] There are no private airstrips within the vicinity of the Project Site. The Project Site is not located within an airport land use plan, nor is it located within 2 miles of a public airport or public use airport. The Project Site is not within a Very High Fire Hazard Severity Zone.[8] Therefore, the Initial Study (Appendix A) determined the Project would have no impact with respect to public airport safety hazards or excessive noise for people residing or working in the Project area, and no further analysis is warranted.

e) Hydrology and Water Quality

The Project would not involve construction of housing. Furthermore, the Project Site is not located within a 100-year flood hazard area.[9] As such, the Project Site would not place structures within a 100-year flood hazard area. In addition, the Project Site is located approximately 0.6 miles east of the mapped Hollywood Reservoir inundation area and 1 mile west of another inundation area.[10] The likelihood of a breach is low, and the Project Site is not located within the mapped path of any inundation areas. As such, the Project is not expected to be subject to hazards associated with flooding, including flooding as a result of levee or dam failure.

The Project Site is located 13 miles northeast of the Pacific Ocean and is not located within an area mapped by the City as having the potential to be impacted by a tsunami. As such, no impacts related to tsunami hazards would occur on the Project Site. Regarding the potential for mudflow, the Project Site has relatively flat topography and is not located within a landslide hazard area as mapped by the state or the City, nor is it within a hillside area as mapped by the City.[11] The Hollywood Hills are located approximately 1 mile north of the Project Site. These hills are mapped on the Landslide Inventory and Hillside Areas map in the General Plan Safety Element. However, the distance between the Hollywood Hills and the Project Site (approximately 1 mile) and the intervening structures reduces the likelihood for any potential mudflows to reach the Project Site. For these reasons, the Initial Study determined impacts would be less than significant with respect to flooding, tsunami or seiche zones.

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7 California Department of Transportation (Caltrans), California Aviation Facilities, July 7, 2017.

8 City of Los Angeles, Navigate LA Map, Special Areas layer, July 7, 2017.

9 Federal Emergency Management Agency, Flood Insurance Map No. 1208C0453L, effective on September 11, 2009, https://msc.fema.gov/portal/search#searchresultsanchor, accessed May 4, 2020.

10 City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G – Inundation & Tsunami Hazard Areas in the City of Los Angeles, and Exhibit C – Landslide Inventory & Hillside Areas, October 1993.

11 City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G – Inundation & Tsunami Hazard Areas in the City of Los Angeles, and Exhibit C – Landslide Inventory & Hillside Areas, October 1993.

f) Land Use and Planning

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

g) Mineral Resources

The Division of Mines and Geology (renamed the California Geological Survey in 2006) has mapped the Project Site within Mineral Resource Zone 3 for aggregate resources. Mineral Resource Zone 3 is a designation given to areas containing mineral deposits, the significance of which cannot be evaluated from available data.[12] The Project area is not delineated as a locally important mineral resource recovery site in the General Plan.[13] The Project Site is located in a fully developed and urbanized area and does not support any mineral extraction activities. Due to the developed, urbanized nature of the Project Site and its surroundings, as well as the absence of known mineral resources as mapped by the State, project implementation is not anticipated to result in loss of availability of a known mineral resource of value to the region and residents of the state. The Initial Study determined no impacts to state or regionally important mineral resources would occur.

[12] Division of Mines and Geology, Generalized Mineral Land Classification Map of Los Angeles County – South Half – Aggregate Resources Only, USGS 7.5 Minute Topographic Quadrangles, 1994.

[13] City of Los Angeles Los Angeles Citywide General Plan Framework EIR, Figure GS-1, June 1996.

h) Noise

The nearest public airport is the Hollywood Burbank Airport, located approximately 8 miles northwest of the Project Site.[14] The Project Site is not located within an airport land use plan, nor is it located within 2 miles of a public airport or public use airport. There are no private airstrips within the vicinity of the Project Site. Therefore, the Project would not expose people residing or working in the Project area to excessive noise related to public airports. The Initial Study (Appendix A) determined no impacts would occur.

i) Population and Housing

The Project would primarily involve redevelopment of existing parking uses and medical office buildings on the Project Site with new, expanded parking and medical uses. Site 1 contains one duplex, at 1328 North New Hampshire Avenue. This structure would be demolished under the Project. However, the quantity of existing housing that would be displaced (one duplex) would not be substantial. As such, the Project would not necessitate the construction of replacement housing elsewhere. The Initial Study (Appendix A) determined no impacts would occur.

j) Wildfire

On December 28, 2018, the California Natural Resources Agency finalized the updates to the State CEQA Guidelines. The Notice of Preparation for the proposed Project was issued September 21, 2017, and the environmental analysis was initiated at the same time. As such, the analysis included within this Draft EIR considers the State CEQA Guidelines that were effective at the time the Notice of Preparation was issued and environmental analysis began. The new State CEQA Guidelines (adopted December 28, 2018) now include a discussion in Appendix G on Wildfire, and for the reasons discussed previously, are not included within the analysis provided throughout this Draft EIR. The following discussion describes the proposed Project's environmental impact as it relates to wildfire, which was found to be less than significant:

[14] Caltrans, California Aviation Facilities, July 7, 2017.

According to the California Department of Forestry and Fire Protection's Fire Hazard Severity Zone Viewer, the Project Site and surrounding area is not located in a Very High Fire Hazard Severity Zone.[15] The Project Site is located within a fully developed area and is not located adjacent to wildland areas. As such, prevailing winds and other factors would not create or exacerbate wildfire risks. The Project Site is highly disturbed and consists primarily of commercial, medical, and residential uses with some vegetation and small amounts of unpaved areas. Due to the highly disturbed nature of the Project Site, the installation or maintenance of associated infrastructure (such as roads, or other utilities) would not create or exacerbate a fire risk. Additionally, the proposed Project would not install fuel breaks or emergency water sources that may exacerbate fire risk. The Project Site is relatively flat, and thus, would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Future development under the proposed Project would not conflict with existing plans governing emergency access. Therefore, impacts related to wildfire are considered less than significant, and no cumulative impacts related to wildfires would occur.

[15] CAL FIRE (California Department of Forestry and Fire Protection), "FHSZ Viewer." Accessed January 11, 2021, http://egis.fire.ca.gov/FHSZ/ (2021).

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