



Kaiser Permanente Los Angeles Medical Center Project

Environmental Case: ENV-2015-4476-EIR
State Clearinghouse No.: 2017091061

Project Location: 1317, 1321, 1329, & 1345 North Vermont Avenue; 1328 North New Hampshire Avenue; 4760 Sunset Boulevard; 1505 North Edgemont Street; 1526 North Edgemont Street; 1517 North Vermont Avenue; 4950 West Sunset Boulevard, Los Angeles, California, 90027

Community Plan Area: Hollywood

Council District: 13—O'Farrell

Project Description: The Project would expand the existing Kaiser Permanente Los Angeles Medical Center (Medical Center) by replacing existing facilities and adding new buildings. The purpose of the Project is to expand and improve the Medical Center's campus to better serve the surrounding community. The total square footage of the proposed buildings would be 401,100 square feet (Option A) or 533,400 square feet (Option B). The Project would be developed in three consecutive phases. Phase 1 of the Project would include demolition of existing facilities, which include commercial and residential structures, surface parking lots, and two medical office buildings (MOBs). Phase 2 would include the demolition of an existing MOB and existing parking structure. And Phase 3 would include the construction of a new MOB (Option A) or hospital addition (Option B). The purpose of the Project is to expand and improve the Medical Center's campus to better serve the surrounding community.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Dudek

APPLICANT:

Kaiser Foundation Hospitals

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I. Introduction

As defined by Section 21087 of the California Public Resources Code (PRC), which codifies the California Environmental Quality Act (CEQA), the City of Los Angeles (City) is the Lead Agency for the Project. In accordance with CEQA Guidelines Section 15089, the City has prepared a Final Environmental Impact Report (EIR) which it must certify before it can approve a project. The purpose of the Final EIR, among others, is to provide an opportunity for the lead agency to respond to comments made by the public and governmental agencies in regard to the Kaiser Permanente Los Angeles Medical Center Project Draft EIR. The Final EIR, pursuant to CEQA Guidelines Section 15132, is comprised of revisions to the Draft EIR; a list of persons, organizations, and agencies that provided comments on the Draft EIR; responses to comments received regarding the Draft EIR; and a Mitigation Monitoring Program.

The EIR is comprised of the Draft EIR and the Final EIR. The Draft EIR was released for public comment on July 29, 2021. The comment period ended on September 13, 2021, meeting the minimum 45-day review period required by the CEQA. The Draft EIR is incorporated by reference and bound separately.

1. Organization of the Final EIR

This Final EIR is organized in the following sections:

I. Introduction

This section is intended to provide a summary of the project description and CEQA requirements.

II. Responses to Comments

This section includes a matrix of public agencies, organizations, and individuals who submitted comments on the Draft EIR, and detailed responses to the comment letters submitted to the City in response to the Draft EIR. The original comment letters in their entirety are included in **Appendix FEIR-1**.

III. Revisions, Clarifications, and Corrections

This section provides a complete overview of the revisions to the Draft EIR that have been incorporated into the Final EIR in response to the comments submitted during the public review period or that were initiated by staff. These changes do not add significant new

information that would affect the analysis or conclusions presented in the Draft EIR. More specifically, CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has been given (refer to PRC Section 21092.1 and CEQA Guidelines Section 15088.5) but before the EIR is certified. CEQA Guidelines Section 15088.5(a) specifically states that “[n]ew information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.” ‘Significant new information’ requiring recirculation includes, for example, a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

CEQA Guidelines Section 15088.5 also provides that “[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR... A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.”

As demonstrated in this Final EIR, neither the comments submitted on the Draft EIR, the responses to these comments, nor the corrections and additions presented in Chapter III, Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR, constitute new significant information warranting recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA and the CEQA Guidelines.

IV. Mitigation Monitoring Program

This section includes a list of the project design features and mitigation measures and includes detailed information with respect to the City’s policies and procedures for implementation of those project design features and mitigation measures. This Mitigation

Monitoring Program (MMP) identifies the monitoring phase, monitoring frequency, the enforcement phase, the applicable department or agency responsible for ensuring that each project design feature or mitigation measure is implemented, and the action indicating compliance.

The Final EIR also includes the following appendices:

Appendix FEIR-1: Draft EIR Comment Letters –This appendix to the Final EIR includes copies of all written comment letters received on the Draft EIR.

Appendix FEIR-2: Additional Viewshed Studies – This appendix to the Final EIR includes additional requested viewshed studies in response to Comment Letter C.

2. Project Description Summary

The Project proposes to expand the existing Kaiser Permanente Los Angeles Medical Center (Medical Center) campus by replacing existing facilities and adding new buildings. The purpose of the Project is to expand and improve the Medical Center’s campus to provide additional office space, diagnostic, and treatment space to better serve the surrounding community.

The Project Site is comprised of six (6) building sites located along Sunset Boulevard, between North Alexandria Avenue and North Vermont Avenue, identified herein and throughout the EIR as identified herein as Sites 1 through 6. The total square footage of the proposed buildings for all three phases would be 401,100 square feet under Option A and 433,100 square feet under Option B.

The Project would be developed in three consecutive phases. Phase 1 of the Project would include the demolition of existing structures (commercial and residential), surface parking lots, and two medical office buildings (MOBs). In addition, Phase 1 would include construction of a new MOB and parking structure on Site 1, replacement of surface parking with construction of the Procedure Center addition to the existing MOB on Site 2. Phase 2 of the Project would include the demolition of an existing parking structure and MOB. In addition, Phase 2 would include the construction of a new parking structure that features ground floor commercial retail space as well as either a new MOB (Option A) or hospital addition (Option B). Lastly, Phase 3 of the Project would include the construction of a new MOB and parking structure. The first phase is anticipated be completed by 2024. The second phase would begin in 2024 and would be completed by 2028. The third phase would begin in 2028 and would be completed by 2030.

3. Public Review Process

In compliance with the CEQA Guidelines, the City has taken steps to provide opportunities for public participation in the environmental process. During the preparation of the Draft EIR, the City contacted various government agencies and other interested parties to inform the public of the Project and to solicit comments on the scope of environmental review. The City prepared an Initial Study and circulated a Notice of Preparation (NOP) of a Draft EIR for public comment to the State Clearinghouse, Office of Planning and Research, the Los Angeles County Clerk, responsible and trustee agencies, and other interested parties on September 21, 2017 for a 30-day public review period. Additionally, a public Scoping Meeting was held on October 2, 2017. The Initial Study, NOP, and NOP comment letters are included in Appendix A of the Draft EIR.

In compliance with CEQA Guidelines Sections 15087 and 15105, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research. The public review period commenced on July 29, 2021 and ended on September 13, 2021. In compliance with CEQA Guidelines Section 15087(d), a Notice of Completion and Availability of the Draft EIR was filed with the Los Angeles County Clerk. The Draft EIR was also made available for review on the City's website, at the Department of City Planning by appointment, and at four local libraries. Following the Draft EIR public comment period, this Final EIR has been prepared and includes responses to the comments raised regarding the Draft EIR.

II. Responses to Comments

1. Introduction

The CEQA review process provides opportunities for public participation, including periods for public review and comment on the adequacy of the Draft EIR prior to certification. Sections 21091(d) and 21092.5 of the Public Resources Code (PRC) and CEQA Guidelines Section 15088 govern the lead agency's responses to comments on a Draft EIR. Section 15088(a) of the CEQA Guidelines requires that the lead agency evaluate comments on environmental issues received from persons who reviewed the Draft EIR and prepare a written response to comments received during the comment period. Section 15204(a) of the CEQA Guidelines clarifies that the lead agency is not required to accept every suggestion it is given, provided that the lead agency explains why specific comments/suggestions were not accepted and responds to significant environmental issues with substantial evidence and makes a good faith effort at disclosure. Reviewers of the Draft EIR are encouraged to examine the sufficiency of the environmental document, particularly in regard to significant effects, and to suggest specific mitigation measures and project alternatives. Furthermore, Section 15204(c) of the CEQA Guidelines advises reviewers that comments should be accompanied by factual support.

Section II.2, Matrix of Comments Received on the Draft EIR, includes a table that summarizes the environmental issues raised by each commenter regarding the Draft EIR. The Department of City Planning received a total of eleven comment letters on the Draft EIR during the designated public review period (between July 29 and September 13, 2021). Each comment letter has been assigned a corresponding number, and comments within each comment letter are also numbered. The agencies, departments, and organizations/persons that provided written comments on the Draft EIR to the Department of City Planning are listed in the summary table below, which also indicates the issue areas on which each organization/person commented.

Section II.3, Comment Letters and Responses, provides detailed responses to all comments related to the environmental review and acknowledges comments and opinions relating to the Project. Copies of the original comment letters are provided in Appendix FEIR-1 of this Final EIR.

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2. Matrix of Comments Received on the Draft EIR

SUMMARY OF COMMENTS Kaiser Permanente Los Angeles Medical Center Project	Letter Designation	Executive Summary	Environmental Setting	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Geology and Soils	Greenhouse Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality	Land Use and Planning	Noise	Population and Housing	Public Services	Transportation	Tribal Cultural Resources	Utilities	Energy Consumption and Conservation	Alternatives	Other	Explanation of "Other"
State Agencies and Departments																							
State of California Department of Transportation District 7 – Office of Regional Planning	A																X						
City and County of Los Angeles Officials, Agencies & Departments																							
Los Angeles County – Metropolitan Transportation Authority	B																X						
City of Los Angeles Department of Cultural Affairs – Cultural Affairs Commission	C					X	X																
South Coast Air Quality Management District	D					X					X												
Los Angeles City College	E																					X	Letter of support
Organizations and Individuals																							
Covenant House California	F																					X	Letter of support
Boys and Girls Club of Hollywood	G																					X	Letter of support
Hollywood United Methodist Church	H																					X	Letter of support
Wesley Health Centers	I																					X	Letter of support
My Friend's Place	J																					X	Letter of support
Hollywood 4WRD	K																					X	Letter of support

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3. Comment Letters and Responses

Comment Letter A

Miya Edmonson
IGR/CEQA Branch Chief
Department of Transportation, District 7
100 S. Main St, MS 16
Los Angeles, CA 90012

Comment No. A-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The project proposes to expand the existing Kaiser Permanente Los Angeles Medical Center (Medical Center) campus by replacing facilities and adding new buildings. It would be developed in three consecutive phases and involve six sites. Phase 1 of the Project would include demolition of existing commercial and residential structures and surface parking lots on Sites 1 and 2, and two medical office buildings (MOBs) on Sites 3 and 4. Phase 1 would also include construction of a parking structure and MOB on Site 1 and a procedure center addition to the existing MOB on Site 2. Phase 2 of the Project would include the demolition of an existing parking structure and MOB space on Site 5 and construction of a new, larger parking structure with ground floor commercial retail space. Phase 2 would also include construction on Site 4 of either an MOB (Option A) or a hospital addition (Option B). Phase 3 of the Project would include construction of a new MOB on Site 3 and a parking structure on the south side of the existing parking structure on Site 6. If Option A is selected for Phase 2, the MOB constructed at Site 3 would be smaller (41,500 square feet). If Option B is selected for Phase 2, the MOB at Site 3 would be larger (73,500 square feet). The proposed buildings for all three phases would total 401,100 square feet under Option A or 433,100 square feet under Option B, with an additional 533,400 square feet of parking structure area. The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 5,000 feet away from US-101 and Sunset Boulevard ramps. From reviewing the DEIR, Caltrans has the following comments.

Response to Comment No. A-1

The City acknowledges the comment and notes that it restates information contained in the Draft EIR and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR or any adverse physical impact the Project may have on the environment. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. Therefore, no further response is required or provided.

Comment No. A-2

We support implementing the Transportation Demand Measures (TDMs) this project has proposed, including bicycle parking, walkability enhancements, and the other TDMs included under Project Design Feature “PDF-TRF-2”. Caltrans encourages Lead Agencies to implement TDM strategies that reduce Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions because this aligns with Caltrans’ mission to provide a safe and reliable transportation network that serves all people and respects the environment. In addition to the proposed TDMs, please consider providing less vehicle parking through perhaps offering unbundled parking or parking cash-out programs. This is because research has shown that an abundance of vehicle parking can induce increased driving and VMT.

Response to Comment No. A-2

The City acknowledges the comment and notes that it expresses support for the implementation of the proposed TDMs associated with the Project. PDF-TRF-2 can be found in Section IV.IV.M.3 of the Draft EIR. This comment also suggests reducing proposed parking or providing other incentives to decrease VMT. Reduction in parking has been considered during the Project planning process. However, the nature of the Project’s hospital use is a factor in maintaining the number of parking proposed, despite its location in proximity to public transit. Nevertheless, PDF-TRF-2 has been incorporated into the Project and includes various TDMs in compliance with the City’s existing Transportation Demand Management and Trip Reduction Measures Ordinance. The comment does not raise any issue concerning the adequacy of the Draft EIR or any adverse physical impact the Project may have on the environment. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. No further response is required or provided.

Comment No. A-3

For additional information on limiting VMT on the State Highway System, see Caltrans’ updated *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (TISG), dated May 2020 and released on Caltrans’ website in July 2020: <https://dot.ca.gov/-/media/dot-media/programs/transportationplanning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>. Note that since the passage of Senate Bill 743, Caltrans bases its project reviews off its new TISG, as opposed to the 2015 “Freeway Impact Analysis Procedures” agreement executed between LADOT and Caltrans District 7 that is referenced in Appendix L.

Response to Comment No. A-3

The comment provides background information regarding limiting VMT on the State Highway System and suggests referencing the Caltrans TISG. The transportation impact study was originally prepared for the Project by Linscott, Law & Greenspan, Engineers (LLG) in August 2018 prior to the City of Los Angeles and Caltrans formally adopting new guidelines in response to Senate Bill (SB) 743 in 2020. As discussed in the Draft EIR, SB 743 resulted in a change in the way transportation impacts are assessed for purposes of CEQA (*i.e.*, a shift away from Level of Service [LOS] to an assessment of vehicle miles traveled [VMT]) and jurisdictions had until July 1, 2020 to begin complying with this new transportation impact metric. Thus, a supplemental VMT assessment was prepared by LLG for the Project and was approved by the Lead Agency (*i.e.*, the City of Los Angeles Department of Transportation [LADOT]) in April 2020. The supplemental VMT assessment was based on the latest version of the City's adopted VMT calculator, which is based in part on regional travel demand modeling consistent with the Southern California Association of Governments (SCAG's) model and reflects additional refinement within the City of Los Angeles by the City.

The Caltrans Transportation Impact Study Guide (TISG, May 20, 2020) referenced by the commenter sets forth guidance for Caltrans' review of a land use project or plan's transportation analysis using a VMT metric. This Caltrans guidance is not binding on other public agencies and is intended to be a reference and informational document. Section 3.2 (VMT Calculation) of the Caltrans TISG notes that a lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT. The Draft EIR contains a VMT assessment based on the Lead Agency's methodology (as contained in Appendix L-4 of the Draft EIR), and a finding of no significant work VMT impact per employee was reached, as the project's daily work VMT per employee was estimated at 7.4, which is lower than the established threshold of 7.6 daily work VMT per employee for the Central Area Planning Commission area. The Draft EIR's analysis accounted for the effect of PDF-TRF-2, which outlines additional measures to reduce VMT, as well as compliance with the Lead Agency's existing Transportation Demand Management and Trip Reduction Measures Ordinance (Ordinance No. 168700). Therefore, while the August 2018 LLG transportation impact study did include, within Appendix L, a copy of the 2015 "Freeway Impact Analysis Procedures" agreement between Caltrans District 7 and the City of Los Angeles as part of the formal Memorandum of Understanding (MOU) executed for the project consistent with the latest LADOT guidelines in effect at that time the original study was prepared, the Lead Agency has addressed Project VMT impacts via the supplemental LLG analysis prepared in 2020. No further analysis is warranted or required and the analysis approved by the Lead Agency in 2020 is consistent with SB 743 and CEQA's requirements.

Comment No. A-4

The following information is included for your consideration. If construction traffic is expected to cause issues on any State facilities, please submit the Construction Staging and Traffic Management Plan detailing these issues for Caltrans' review. We support and appreciate the following measures in this plan:

- Schedule delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods, to the extent possible.
- Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities, if needed.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2017-03667.

Response to Comment No. A-4

The comment provides requests that the Project's Construction Staging and Traffic Management Plan (CSTMP) be submitted to Caltrans if construction traffic is expected to cause issues on any state facilities. No state facilities are anticipated to be affected, but for any construction encroachment onto Caltrans' facilities by the Project, the necessary permits and approvals would be obtained. As part of that process, the CSTMP would be submitted to Caltrans for review. As discussed in Section IV.M.3, Transportation, of the Draft EIR, Kaiser Permanente shall prepare a CSTMP to address traffic concerns associated with the Project, as required by project design feature PDF-TRF-1, and is incorporated into the transportation analysis of the Draft EIR. As noted in the comment, the Project's CSTMP would include measures to schedule the delivery of construction materials and obtain a Caltrans transportation permit to allow the use of oversized transport vehicles, as explicitly stated in PDF-TRF-1. The City acknowledges Caltrans' support for the inclusion of these measures in PDF-TRF-1.

Comment Letter B

Shine Ling, AICP
Manager, Transit Oriented Communities
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

Comment No. B-1

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Kaiser Permanente Los Angeles Medical Center Project (Project) located at 1345 North Vermont Avenue (Ave.), 4760 Sunset Boulevard (Blvd.), 1505 North (N.) Edgemont Street (St.), 1526 N Edgemont St., 1517 N. Vermont Ave., 4950 West (W.) Sunset Blvd. in the City of Los Angeles (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro's area of statutory responsibility pursuant to Sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. In particular, this letter outlines topics regarding the Project's potential impacts on the Metro B Line (Red) and Metro bus facilities and services which should be analyzed in the EIR, and provides recommendations for mitigation measures as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.

In addition to the specific comments outlined below, Metro is providing the City and Kaiser Permanente (Applicant) with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at <https://www.metro.net/devreview>.

Response to Comment No. B-1

The City acknowledges the comment as an introduction to comments that follow and provides background information. In addition, the comment provides the Metro Adjacent

Development Handbook for an overview of common concerns associated with development adjacent to Metro ROW, including access to Metro facilities and potential construction impacts. The Draft EIR addresses adjacent Metro facilities, including the Metro B Line Vermont/Sunset Station and several Metro bus lines, in Section IV.M., Transportation, and Section IV.J., Noise, of the Draft EIR; please refer to responses to comments that appear later in this comment letter, including Response to Comment No. B-3 and B-4. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR or any adverse physical impact the Project may have on the environment. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. No further response is required.

Comment No. B-2

Project Description

The Project includes expanding the existing Kaiser Permanente Los Angeles Medical Center (Medical Center) campus by replacing facilities and adding new buildings. The Project would be developed in three consecutive phases.

Response to Comment No. B-2

The comment restates information contained in the project description of the Draft EIR and does not raise any issues related to the adequacy of any specific section or analysis of the Draft EIR or any adverse physical impact the Project may have on the environment. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. Therefore, no further response is required or provided.

Comment No. B-3

Recommendations for EIR Scope and Content

Bus Service Adjacency

1. Service: Metro Bus Line 2 operates on Sunset Blvd, and Lines 204, 206, and 754 operate on Vermont Avenue, adjacent to the proposed Project. Several Metro Bus stops are directly adjacent to the Project. Other transit operators such as LADOT may provide service in the vicinity of the Project and should be consulted.
2. Impact Analysis: The EIR should analyze potential effects on Metro Bus service and identify mitigation measures as appropriate. Potential impacts may include impacts to transportation services, stops, and temporary or permanent bus service

rerouting. Specific types of impacts and recommended mitigation measures to address them include, without limitation, the following:

- a. Bus Stop Condition: The EIR should identify all bus stops on all streets adjacent to the Project site. During construction, the Applicant may either maintain the stop in its current condition and location, or temporarily relocate the stops consistent with the needs of Metro Bus operations. Temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be Americans with Disabilities Act (ADA)-compliant and allow passengers with disabilities a clear path of travel between the bus stop and the Project. Once the Project is completed, the Applicant must ensure any existing Metro bus stops affected by the Project is returned to its pre-Project location and condition, unless otherwise directed by Metro.
- b. Driveways: Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.
- c. Bus Stop Enhancements: Metro encourages the installation of enhancements and other amenities that improve safety and comfort for transit riders. These include benches, bus shelters, wayfinding signage, enhanced crosswalks and ADA-compliant ramps, pedestrian lighting, and shade trees in paths of travel to bus stops. The City should consider requesting the installation of such amenities as part of the Project.
- d. Bus Operations Coordination: The Applicant shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 not later than 30 days before the start of Project construction. Other municipal bus services may also be impacted and shall be included in construction outreach efforts.

Response to Comment No. B-3

The City acknowledges the comment and notes the provided recommendations regarding bus service adjacency associated with the Project. As indicated by the comment letter, the comments presented are recommendations for the EIR scope and content, which would be more appropriately provided during an EIR's scoping period (the scoping period for this EIR occurred in September and October 2017), as opposed to comments on the

adequacy of the environmental analysis contained in the Draft EIR released during public review. Nevertheless, the City, in good faith, responds as follows to each item raised in the comment.

Service: This comment describes bus service in the vicinity of the Project. As discussed in Draft EIR Section IV.M., Transportation, the Project Site is located within a transit priority area and is in close proximity to 14 bus lines. In addition, bus service within the Project area is also provided by LADOT DASH and Commuter Express Transit Service. Consistent with the requirements of PDF-TRF-1, the City and Kaiser Permanente will coordinate with public transit agencies beyond LADOT as necessary prior to and during project construction; no permanent alteration to Metro or other transit facilities are anticipated. Specific coordination at this time is not required for the analysis contained within the Draft EIR.

Impacts to Transit: This comment indicates that the EIR should analyze potential effects on Metro Bus services. Based on the analysis set forth at Section IV.M., Transportation, of the Draft EIR, it was concluded that the Project is consistent with applicable plans regarding circulation, including transit services. The Project would not impede the continued operation of Metro facilities. Therefore, impacts associated with transportation associated with the Project would have a less than significant impact on bus services near the Project site.

Bus Stop Condition: The comment requests identification of all bus stops adjacent to the Project Site and provides recommendations for any permanent or temporary modifications to bus stops. Please refer to Table IV.M-2, Existing Transit Routes, of the Draft EIR for a complete list of bus services in the Project vicinity. Construction of the Project may temporarily affect transit stops. PDF-TRF-1 requires the implementation of a CSTMP, which includes provisions for coordination with public transit agencies (including Metro) for temporary stop relocations and to follow all safety required procedures required by the public transit agency. PDF-TRF-1 has been revised to clarify ADA compliance for temporary modifications to Metro facilities and returning such facilities back to existing conditions upon completion of Project construction. Refer to Chapter III, Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR for the revised PDF-TRF-1. No permanent alterations to Metro facilities are anticipated. Thus, impacts to bus stop conditions would be less than significant.

Driveways: This comment provides recommendations for driveway siting relative to transit stops. As discussed in Section IV.M., Transportation, of the Draft EIR, the proposed Project driveways would be compliant with LADOT standards. The proposed Project driveways would intersect an on-street bicycle lane or cross a sidewalk in a high pedestrian area. However, there are no perceived access risks associated with the proposed Project

driveways. Proposed driveways would not interfere with Metro facilities or their safe use. Impacts with regard to driveway siting and safety would be less than significant.

Bus Stop Enhancements: This comment provides recommendations for bus stop enhancements. The City will take into consideration the need for bus stop enhancements for the stops located within proximity to the Project Site and will coordinate with Metro as necessary. However, such enhancements are not required by CEQA and would not be directed at mitigating an adverse physical impact of the Project.

Bus Operations Coordination: This comment pertains to coordination prior to the start of construction. Please refer to the previous discussion pertaining to service and facility condition within this same Response to Comment No. B-3 regarding PDF-TRF-1 and the requirements regarding notification, coordination with public transit agencies including Metro, and safety requirements for temporary relocation of transit stops during Project construction.

Comment No. B-4

Subway Adjacency

1. Operations: The Metro B Line (Red) currently operates peak service as often as every ten minutes in both directions. Trains may operate 24 hours a day, seven days a week in the tunnels below [or adjacent to] the Project.
2. Impact Analysis: Due to the Project's proximity to the Metro B Line (Red) and the Vermont/Sunset Station (Station), the EIR must analyze potential effects on subway operations and identify mitigation measures as appropriate. Critical impacts that should be studied include (without limitation): impacts of Project construction and operation on the structural and systems integrity of subway tunnels; damage to subway infrastructure, including tracks; disruption to subway service; temporary and/or permanent changes to customer access and circulation to the station.

The following provisions should be used to develop a mitigation measure that addresses these potential impacts:

- a. Technical Review: The Applicant shall submit architectural plans, engineering drawings and calculations, and construction work plans and methods, including any crane placement and radius, to evaluate any impacts to the Metro B Line (Red) infrastructure in relationship to the Project. Before issuance of any building permit for the Project, the Applicant shall obtain Metro's approval of final construction plans.

- b. Construction Safety: The construction and operation of the Project shall not disrupt the operation and maintenance activities of the Metro B Line (Red) or the structural and systems integrity of Metro's tunnels. Not later than one month before Project construction, the Applicant shall contact Metro to schedule a pre-construction meeting with all Project construction personnel and Metro Real Estate, Construction Management, and Construction Safety staff. During Project construction, the Applicant shall:
- i. Work in close coordination with Metro to ensure that station access, visibility, and structural integrity are not compromised by construction activities or permanent build conditions;
 - ii. Notify Metro of any changes to demolition and construction activities that may impact the use of the ROW;
 - iii. Permit Metro staff to monitor demolition and/or construction activities to ascertain any impact to the Metro B Line (Red) and Station.
3. Advisories to Applicant: The Applicant is encouraged to contact the Metro Development Review Team early in the design process to address potential impacts. The Applicant should also be advised of the following:
- a. Occupational Safety and Health Administration (OSHA) Requirements: Demolition, construction and/or excavation work in proximity to Metro right-of-way (ROW) with potential to damage subway tracks and related infrastructure may be subject to additional OSHA safety requirements.
 - b. Technical Review: Metro charges for staff time spent on engineering review and construction monitoring.
 - c. Right of Way (ROW) Entry Permit: For temporary or ongoing access to Metro ROW for demolition, construction, and/or maintenance activities, the Applicant shall complete Metro's Track Allocation process with Metro Rail Operations and obtain a Right of Entry Permit from Metro Real Estate. Approval for single tracking or a power shutdown, while possible, is highly discouraged; if sought, the Applicant shall apply for and obtain such approval not later than two months before the start of Project construction. The Applicant shall apply for and obtain approval for any special operations, including the use of a pile driver or any other equipment that could come in close proximity or encroach on the tunnels or related structures, not later than one month before the start of Project construction.

- d. **Cost of Impacts:** The Applicant will be responsible for costs incurred by Metro resulting from Project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure, including single-tracking or bus bridging around closures. The Applicant will also bear all costs for any noise mitigation required for the Project.

Response to Comment No. B-4

The City acknowledges the comment and notes the provided recommendations regarding subway adjacency associated with the Project. Similar to Comment No. B-3, as indicated by the comment letter, the comments presented are recommendations for the EIR scope and content, which would be more appropriately provided during an EIR's scoping period (the scoping period for this EIR occurred in September and October 2017), as opposed to specific comments on the adequacy of the environmental analysis contained in the Draft EIR released during public review. Nevertheless, the City, in good faith, responds as follows to each item raised in the comment:

Operations: This comment provides background information regarding existing subway services in the vicinity of the Project Site. As described in Draft EIR Section IV.M., Transportation, the Project site is located 0.25 miles from the Metro B Line (Red) and a portal is situated within the Kaiser Permanente campus at the northwest corner of the Vermont Avenue/Sunset Boulevard intersection that connects with the subterranean Metro Red Line subway Vermont station (See Draft EIR IV M-14). Please refer to Table IV.M-2, Existing Transit Routes, of the Draft EIR for a complete list of transit services in the Project vicinity, including the Metro B Line Vermont/Sunset Station.

Impact Analysis: This comment provides recommendations for analysis regarding potential physical impacts to the subway system, including structural integrity, service disruption, and access.

Potential impacts (vibration) to the Metro B Line regarding structural integrity and service disruption during construction of the Project is discussed in Section IV.J., Noise, of the Draft EIR. The Metro B Line subway tunnel is considered a potentially vibration-sensitive land use, particularly with regard to potential vibration impacts on subway operations during Project construction, due to typical heavy construction equipment such as a large bulldozer. As shown in Table IV.J-13 of the Draft EIR, construction activities would not exceed FTA criteria for potential building damage at the Metro B Line tunnel. As shown in Table IV.J-14 of the Draft EIR, construction activities are estimated to result in vibration levels exceeding FTA criteria for human annoyance for passengers at the adjacent Metro B Line tunnel and the Vermont/Sunset 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) provides features that would reduce the potential for building damage and human annoyance from construction activities. However, because of the relatively high estimated vibration levels at nearby sensitive uses, including the Metro B Line tunnel, it is unlikely that features listed in Project Design Feature PDF-NOI-2 would be adequate to ensure that vibration impacts related to human annoyance would be less than significant. Therefore, vibration impacts associated with the Project during construction as they relate to both building damage and human annoyance are considered significant and unavoidable.

Construction of the Project may temporarily affect transit stops, which may impact subway service. PDF-TRF-1 requires the implementation of a CSTMP, which includes provisions for coordination with public transit agencies (including Metro) for temporary stop relocations and to follow all required safety procedures required by the public transit agency. No permanent alterations to Metro facilities are planned in connection with the Project, and therefore no permanent changes to customer access and circulation to the station are anticipated. Therefore, the Project would not significantly affect customer access to the Metro B Line Vermont/Sunset Station.

The City and Kaiser Permanente will continue to coordinate with Metro regarding potential alterations to Metro facilities, including review and approval of plans and construction safety.

The commenter further states that provided provisions should be utilized to develop a mitigation measure that addresses potential impacts on subway facilities. However, the comment has not identified any new significant environmental impacts that would result from the Project that are not already addressed in the Section IV.J., Noise, of the Draft EIR, and hence no additional mitigation is required.

Advisories to Applicant: This comment provides recommendations and advises of certain requirements regarding access to or encroachment upon Metro facilities or rights-of-way. The City and Kaiser Permanente will continue to coordinate with Metro regarding potential alterations to Metro facilities, including construction safety, technical review, any required encroachment or other permits, and other such items.

In the event that the Project construction will require demolition, construction and/or excavation work in proximity to Metro ROW, the Project will comply with all applicable OSHA and other regulatory requirements. Additionally, in the event that Project construction will require access to a Metro ROW for demolition, construction, and/or maintenance activities or encroachment on Metro facilities, the Applicant will observe all requisite permitting and review procedures imposed by Metro or other agencies with jurisdiction over that proposed scope of work. However, as no such work is planned at this time and CEQA does not permit a finding to rest on speculation, this comment raises no evidence of a significant impact requiring a further response.

Comment No. B-5

Transit Supportive Planning: Recommendations and Resources

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

1. Transit Supportive Planning Toolkit: Metro strongly recommends that the Applicant review the Transit Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and, applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at <https://www.metro.net/about/funding-resources>.

Response to Comment No. B-5

The City acknowledges the comment and provided recommendations regarding transit planning associated with the Project. Note that the comment contains examples of "transit-supportive places" (i.e. land use oriented planning for housing and infrastructure projects) that do not directly apply to the Project. Further, as stated in Section IV.M., Transportation, of the Draft EIR, the Project would have a less than significant impact related to VMT.

Comment No. B-6

2. Land Use: Metro supports development of commercial and offices near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City and Applicant to be mindful of the Project's proximity to Vermont/Sunset Station, including orienting pedestrian pathways towards the station.

Response to Comment No. B-6

The City acknowledges the comment and notes that it expresses support for the Project's proximity to public transit but does not raise any issue concerning the adequacy of the Draft EIR or any adverse physical impact the Project may have on the environment. Existing and proposed pedestrian entries to the different Sites would be oriented towards the main roadways, such as Sunset Boulevard, Vermont Boulevard, and N. Edgemont Street. The Project would include pedestrian-level wayfinding signage to better orient and ease navigation of pedestrians through the Project Site to support the proximity to public

transit. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. No further response is required or provided.

Comment No. B-7

3. Transit Connections and Access: Metro strongly encourages the Applicant to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. The City should consider requiring the installation of such features as part of the conditions of approval for the Project, including:
 - a. Transfer Activity: Given the Project's proximity to the Metro bus stops and Vermont/Sunset Station the Project design should consider and accommodate transfer activity between bus and rail lines that will occur along the sidewalks and public spaces. Metro has completed the Metro Transfers Design Guide, a best practices document on transit improvements. This can be accessed online at <https://www.metro.net/about/station-design-projects/>.
 - b. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged. The Applicant should also coordinate with the Metro Bike Share program for a potential Bike Share station at this development.
 - c. First & Last Mile Access: The Project should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf.

Response to Comment No. B-7

The City acknowledges the comment and notes the recommendations regarding transit connections and access. As discussed in Draft EIR Section IV.M., Transportation, the Project would be consistent with applicable policies regarding transfer activities and

bicycle parking. The Project would include new sidewalks and pedestrian lighting to accommodate transfer activity from bus stops. In addition, the Project is consistent with Policy 3.5 Multi-Modal Features, which supports last and first mile access by supporting multimodal travel through the implementation of bicycle and pedestrian amenities throughout the Project Site. As analyzed in detail at Section 3(a) of the Draft EIR Section IV. M., Transportation [Thresholds of Significance, Threshold (a)], the Project would have a less than significant impact on the City's circulation system.

Comment No. B-8

4. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

Response to Comment No. B-8

The City acknowledges the comment and notes the recommendations regarding parking. The Project would add 1,068 parking spaces and implement via PDF-TRF-2 a Transportation Demand Management (TDM) program that would include strategies to reduce vehicle trips associated with the Project through promotion/marketing efforts, bicycle infrastructure, and improvements to pedestrian amenities. Details of the Project's TDM can be found in Section IV.M.3, Transportation, of the Draft EIR. Notwithstanding the above, the comment does not identify a significant adverse impact on the physical environment related to parking that is recognized by CEQA, and hence no parking-related mitigation is required.

Comment No. B-9

5. Wayfinding: Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus or Rail pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.

Response to Comment No. B-9

The City acknowledges the comment on wayfinding signage for Metro Services. The comment does not raise any issue concerning the adequacy of the Draft EIR or any adverse physical impact the Project may have on the environment.

Comment No. B-10

6. Transit Pass Programs: Metro would like to inform the Applicant of Metro's employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Small Employer Pass (SEP) Program. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. The A-TAP can also be used for residential projects. For more information on these programs, please visit the programs' website at <https://www.metro.net/riding/eapp/>.

Response to Comment No. B-10

The City notes that the comment provides background information regarding Metro transit pass programs and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR or any adverse physical impact the Project may have on the environment. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. As stated in Section IV.M., Transportation, of the Draft EIR, the Project would have a less than significant impact related to VMT. The comment does not identify a significant adverse impact on the physical environment related to transportation that is recognized by CEQA, and hence no transportation-related mitigation, including but not limited to implementation of a transit pass program, is required under CEQA. The Applicant has been made aware of Metro's transit pass programs. No further response is required or provided.

Comment Letter C

Danielle Brazell
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Comment No. C-1

The City of Los Angeles Department of Cultural Affairs (DCA) is writing to respond to the Draft EIR (DEIR) released for the Kaiser Permanente Los Angeles Medical Center Project (Case Number: *ENV-2015-4476-EIR*). As the immediate neighbor to the proposed improvements, DCA looks forward to working with Kaiser to ensure that Barnsdall Park and its arts centers, galleries, and historic sites are not impacted by this development.

Response to Comment No. C-1

The City acknowledges the comment and notes that it is introductory in nature and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR or any adverse physical impact the Project may have on the environment. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. Therefore, no further response is required or provided.

Comment No. C-2

To further understand the impact of this development, the Department of Cultural Affairs would like greater clarity on the design of these structures and to review the following renderings:

- Plans and elevations for 1526 North Edgemont Street (Option A & Option B) overlaid on those for the existing structure that the new building will replace.

Response to Comment No. C-2

This comment requests specific plans, elevations, and renderings in addition to the plans, elevations, and viewshed studies presented in Figure III-1 through Figure III-6c, and Figure IV.A-11 and Figure IV.A-12 of the Draft EIR. The requested materials are included in Appendix FEIR-2 to this Final EIR as Figure II.C-A. They reflect a conceptual level massing design for the Project's improvements at this stage. As these Figures, viewshed studies, and the materials in Appendix FEIR-2 demonstrate, the Project's improvements would not have a significant effect on Barnsdall Art Park's viewsheds, since the building's height of 1526 North Edgemont Street in Option A and Option B will not exceed the height

of the existing buildings, the massing and density of the proposed improvements are consistent with that of the existing buildings, and these improvements will be substantially hidden from these viewpoints by Barnsdall Art Park's existing trees and other landscape features. The Project would thus not significantly impact the views that contribute to the Barnsdall Art Park's historic and cultural significance, and would not have a significant cultural or historic resources impact on Barnsdall Art Park.

Comment No. C-3

- On page III-29 of the DEIR, two options are cited for the design of 1526 North Edgemont Street. Option B includes mention of "two pedestrian bridges." DCA would like to see renderings that clearly show the overall design for both as well as proposed setbacks on upper floors and detail on these pedestrian bridges.

Response to Comment No. C-3

This comment requests specific plans, elevations, and renderings in addition to the plans, elevations, and viewshed studies presented in Figure III-1 through Figure III-6c, and Figure IV.A-11 and Figure IV.A-12 of the Draft EIR, which include plans and renderings of the proposed pedestrian bridges. The requested materials concerning these pedestrian bridges are included in Appendix FEIR-2 to this Final EIR as Figure II.C-B. They reflect a conceptual level design for the Project's improvements at this stage. As these viewshed studies and the materials in Appendix FEIR-2 demonstrate, the pedestrian bridges would not have a significant impact on the setting that conveys the significance of Barnsdall Art Park. The pedestrian bridges will connect 1526 North Edgemont to the existing building at 4867 Sunset. These bridges will be several stories below the top story of each new building to which they will connect. As Figure II.C-A shows, the pedestrian bridges will not be visible from the eye level of the Hollyhock House as the bridges are located below the roofline of the existing buildings. No such new building will exceed the height, massing, or density of the existing buildings; the bridges will comprise less than 15 percent of the total massing of the buildings to which they will connect; and these bridges will be substantially obscured by Barnsdall Art Park's existing trees and other landscape features. The Project would thus not significantly impact the setting that are relevant to the Barnsdall Art Park's historic and cultural designation, and would not have a significant cultural or historic resources impact on the Barnsdall Art Park.

Comment No. C-4

- Viewshed studies of 1526 North Edgemont Street taken from Hollyhock House's west lawn and from windows in the living room, study, breakfast room, and bedrooms.

Response to Comment No. C-4

This comment requests specific plans, elevations, and renderings in addition to the viewshed studies presented in Figure IV.A-11 of the Draft EIR.

Section IV.A, Aesthetics, of the Draft EIR provides viewshed studies of Site 3 and 1526 North Edgemont Street taken from the exterior of Hollyhock House. Figure IV.A-11 shows views to the southwest from Hollyhock House from the living room roof; the lawn south of Hollyhock House and west of Spring House; and the library roof. The additional materials requested by this comment are included in Appendix FEIR-2 to this Final EIR as Figures II.C-C through II.C-G. They reflect a conceptual level design for the Project's improvements at this stage. These viewshed studies show that the Project's improvements at 1526 North Edgemont Street will not obscure existing views from Hollyhock House and the grounds surrounding it at Barnsdall Art Park. The view shown by Figure II.C-G, the viewshed study from the Hollyhock House's window in the bedroom shows additional massing of the Project improvements at 1526 North Edgemont in the southwestern viewshed. This mass does not obscure views towards the Pacific Ocean and Century City skyline. As these Figures, viewshed studies, and the materials in Appendix FEIR-2 demonstrate, the Project's improvements would not have a significant impact on the setting that is relevant to Barnsdall Art Park's historical and cultural designation, since no Project building's height will exceed the height of the existing buildings; the massing and density of the proposed improvements are consistent with that of the existing buildings; and these improvements will be substantially obscured by Barnsdall Art Park's existing trees and other landscape features. The Project would thus not significantly impact the setting that is relevant to the Barnsdall Art Park's historic and cultural significance, and would not have a significant cultural or historic resources impact on Barnsdall Art Park, including but not limited to Hollyhock House.

Comment No. C-5

- Viewshed studies of the replacement parking structures from the Barnsdall Junior Art Center and from windows in the living room, study, breakfast room, and bedrooms of the Hollyhock House.

Response to Comment No. C-5

This comment requests specific plans, elevations, and renderings in addition to the viewshed studies presented in Figure IV.A-11 and Figure IV.A-12 of the Draft EIR.

Section IV.A, Aesthetics, of the Draft EIR provides viewshed studies to the southwest and southeast. Section IV.A, Aesthetics, of the Draft EIR provides viewshed studies of Site 3 and Site 5 taken from the exterior of Hollyhock House. Figure IV.A-11 shows views to the

southwest from Hollyhock House from the living room roof; the lawn south of Hollyhock House and west of Spring House; and the library roof. Figure IV.A-12 shows views to the southeast from Hollyhock House and Barnsdall Art Park Administration Building; views to the southeast from the roof of Hollyhock House master bedroom (without trees); and views to the southeast from the Barnsdall Art Park Administration Building balcony.

Two of the requested new viewshed studies identified in this comment have been prepared by the Applicant are included in Appendix FEIR-2 to this Final EIR as Figures II.C-H and II.C-I. These viewshed studies show the replacement parking structures from the Barnsdall Junior Art Center (Figure II.C-H) and the replacement parking structures from windows in the bedroom of the Hollyhock House (Figure II.C-I). These viewshed studies show the additional mass to the southeast of Barnsdall Art Park. These studies show the Project's improvements will not change or obscure existing views of the urban surroundings and mountains to the southeast from Hollyhock House and the grounds surrounding it at Barnsdall Art Park.

Three of the viewshed studies requested by this comment (*i.e.* views of the replacement parking structure from the living room, study and breakfast rooms of the Hollyhock House) requested studies from angles where the parking structures would not be visible and have therefore not been provided in Appendix FEIR-2. The windows in the living room of the Hollyhock House are all oriented to the west and the replacement parking structures are located to the southeast; thus, the replacement parking structures would result in no changes to the view from the living room windows. The windows in the study of the Hollyhock House are oriented to the south with views to the southwest. Views to the southeast (the location of the parking structures) are obscured by the features of the Hollyhock House; thus, the replacement parking structures would result in no changes to the view from the study windows. The windows in the breakfast room of the Hollyhock House are oriented to the south and west with views to the southwest. Views to the southeast (the location of the parking structures) are obscured by the features of the Hollyhock House; thus, the replacement parking structures would result in no changes to the views from the breakfast room windows.

As these figures, prior viewshed studies, and new viewshed studies in Appendix FEIR-2 demonstrate, the Project's replacement parking structures would not have a significant impact on Barnsdall Art Park's setting since the referenced parking structures' height will not exceed the height of the existing buildings; their massing and density are consistent with that of the existing buildings; and these improvements will be substantially obscured by Barnsdall Art Park's existing trees and other landscape features. The Project would thus not significantly impact the setting that is relevant to the Barnsdall Art Park's historic and cultural significance, and would not have a significant cultural or historic resources impact on Barnsdall Art Park, including but not limited to Hollyhock House.

Comment No. C-6

Hollyhock House is one of Barnsdall Park’s historic sites that borders the proposed development. Hollyhock House is owned and operated by the City of Los Angeles Department of Cultural Affairs (DCA). Hollyhock House is a National Historic landmark and a Los Angeles Historic-Cultural Monument. In July 2019, Hollyhock House was one of eight sites inscribed to the UNESCO World Heritage List as part of “The 20th-Century Architecture of Frank Lloyd Wright.”

Response to Comment No. C-6

This comment pertains to information on the ownership, operation, and designation of Hollyhock House and Barnsdall Art Park. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR or any physical impact the Project may have on the environment. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. No further response is thus required under CEQA at this time.

Comment No. C-7

The UNESCO World Heritage inscription establishes boundaries for both the property and its buffer zone. The property boundaries closely align to that of the Barnsdall Park hilltop, while the buffer zone encompasses the 36-acre property Aline Barnsdall originally purchased in 1919 (bounded by Hollywood Boulevard to the north, Vermont Avenue to the east, Sunset Boulevard to the south, and Edgemont Street to the west). Protection of the viewshed from Hollyhock House is of critical importance in maintaining the site’s outstanding universal value and authenticity.

Response to Comment No. C-7

This comment pertains to the Buffer Zone around Hollyhock House established as part of a 2019 revision to the UNESCO World Heritage List. Impacts to the viewshed from Hollyhock House are addressed in Section IV.D, Cultural Resources, and specifically on Page IV.D-36 of the Draft EIR. The analysis of impacts considered view points from Barnsdall Art Park that were previously defined in the established scholarship of Frank Lloyd Wright and Barnsdall Art Park cited in the NHL nomination (2005) and UNESCO documentation (2016). In these documents, the views to the north from the roof terrace, towards the Hollywood Hills, and to the southwest, towards the ocean, are described as views that are of critical importance in maintaining Hollyhock House’s outstanding universal value and authenticity and contribute to its historic and cultural significance. The westward-facing viewshed, particularly from the “Schindler Terrace,” has been identified as the principal viewshed. This viewshed would not be impacted by the Project’s planned

activities. Changes to the viewshed to the south, where the Project is located, would not represent a substantial change from existing conditions, as discussed above and evidenced by the Draft EIR's visual simulations and the additional simulations prepared pursuant to the commenter's request and included as Appendix FEIR-2.

Furthermore, while components of the Project are located within the buffer zone described in the revised UNESCO documentation from 2019, the boundary of the buffer zone does not alter the analysis or standard to which the Project is held under the Los Angeles Zoning Code and CEQA (which comprise the controlling regulatory framework) with regard to the analysis of impacts to the setting of Barnsdall Art Park and its ability to convey historic significance.¹ UNESCO's discussion of a buffer zone does not mean that all viewsheds that could be affected by development in the buffer zone are viewsheds that are of critical importance to conveying the outstanding universal value of Hollyhock House that supports its inscription on the World Heritage list. Rather, the revised UNESCO documentation conveyed that non-viewshed attributes of Hollyhock House were the focus, and to the extent that views were mentioned, only the views to the north from the roof terrace, towards the Hollywood Hills, and to the southwest, towards the ocean, are described as views that are of critical importance in maintaining Hollyhock House's outstanding universal value and authenticity and contribute to its historic and cultural significance. As noted above, these principle viewsheds to the north will not be affected by the Project.

The revised UNESCO documentation designates certain viewsheds to be of greater importance than others, as can be seen in the buffer zone's application of a more restrictive 50 foot height limit to the west and east, while to the south, it merely states that new buildings should not exceed the existing hospital's height of 105 feet. The Project complies with this height limitation (which is also what existing zoning already requires). Thus, the inclusion of a portion of the Project Site in the buffer zone does not change the value of viewsheds to the south of Hollyhock House beyond what is indicated in the original UNESCO documentation and the NHL listing for this historical resource.

Comment No. C-8

Kaiser Permanente's DEIR includes two replacement structures in the Phase-2 work schedule located within Hollyhock House's buffer zone. The medical building at 1526 North Edgemont Street and parking structure at 1517 North Vermont Boulevard are both planned to be 105 feet tall, inclusive of rooftop structures.

¹ While the UNESCO documentation discusses a buffer zone being established for Hollyhock House, this buffer zone has not been separately established as a restriction by the City of Los Angeles. For the Kaiser LAMC campus, the buffer zone is consistent with existing zoning. Thus, the buffer zone has no additional legal restriction beyond the zoning already in effect.

The medical building will not exceed the height of the existing building it is replacing; however, the Department has not had an opportunity to see proposed plans for this building to understand if the side of the building will change the viewshed from Hollyhock House. The replacement parking structure will be taller than the one it is replacing; however, it will be approximately the same height as the parking structure next to it. While this new parking structure will be largely shielded from Hollyhock House's view by the Barnsdall Junior Art Center in the park's southeast corner, it will change the view from the Barnsdall Junior Art Center.

Response to Comment No. C-8

This comment pertains to the height of certain Project improvements and the changes new buildings may cause to views from Hollyhock House and the Barnsdall Junior Art Center. The analysis of impacts on cultural resources in Section IV.D., Cultural Resources, and on Pages IV.D-42 to 43 of the Draft EIR, which analysis is based on the findings in the Cultural Resources Report for the Kaiser Permanente Los Angeles Medical Center Project (Appendix D-1) with additional viewshed analysis found in Section IV.A, Aesthetics, of the Draft EIR. The analysis demonstrates that the referenced medical office building and replacement parking structure will not have a significant effect on the Hollyhock House's viewsheds since the referenced parking structures' height will not exceed the height of the existing buildings, their massing and density are consistent with that of the existing buildings, and these improvements will be substantially hidden from these viewsheds by Barnsdall Art Park's existing trees, other landscape features, and the Barnsdall Junior Art Center, as this comment acknowledges. The Barnsdall Junior Art Center is a part of the UNESCO World Heritage inscription in the sense that the geographic limits of the inscription were set broadly to encompass Barnsdall Art Park, within which Hollyhock House is situated. The Junior Art Center, and all buildings except Hollyhock House, are not specifically listed on the UNESCO World Heritage List. Nevertheless, the additional viewshed analysis attached in Appendix FEIR-2 (specifically, Figure II.C-H) shows that this medical office building at 1526 North Edgemont Street and replacement parking structure would likewise not have a significant effect on the viewsheds from the Barnsdall Junior Art Center since these improvements' height will not exceed the height of the existing buildings, their massing and density are consistent with that of the existing buildings, and these improvements will be substantially obscured by Barnsdall Art Park's existing trees and other landscape features. The Project would thus not significantly impact the setting that is relevant to the Barnsdall Art Park's historic and cultural designation, and would not have a significant cultural or historic resources impact on the Barnsdall Art Park.

As described in the Draft EIR, the setting of the Aline Barnsdall Complex has been altered since its period of significance from 1900 through 1924 and since it was gifted

to the City of Los Angeles in 1927. The analysis of impacts considered view points from Barnsdall Art Park that were previously defined in the established scholarship of Frank Lloyd Wright and Barnsdall Art Park cited in the NHL nomination (2005) and UNESCO documentation (2016). In these documents, the views to the north from the roof terrace, towards the Hollywood Hills, and to the southwest, towards the ocean, are described as views that are of critical importance in maintaining Hollyhock House's outstanding universal value and authenticity and contribute to its historic and cultural significance. The west-facing viewshed, particularly from the contributing structure "Schindler Terrace," was identified in the NHL nomination as the principle viewshed. This viewshed would not be impacted by the Project's planned activities, because the Project activity lies south of the Schindler Terrace, not west where the principal viewshed is located. Therefore, the key vista that supports the complex's ability to convey its significance would not be affected.

The south viewshed from the Hollyhock House would be affected by Project activities at Site 4, which include demolition of the eight-story hospital building at 1526 North Edgemont Street. In the later phases of the Project, the south viewshed would also be affected by the proposed new construction and additions to existing buildings on the Medical Center campus. However, the south viewshed is not mentioned as a view that contributes to the significance of Barnsdall Park in the NHL nomination. Moreover, the south viewshed has already been materially altered by the addition and demolition of multiple three- to eight-story MOBs along Sunset Boulevard between 1953 and present (2019), and presumably had already been altered prior to the establishment of the medical campus in 1953. The building at 1526 North Edgemont Street is 105 feet in height above grade, and the Project would replace it with either another 105-foot-tall building (Option A), or a slightly smaller 100-foot-tall building (Option B). Complete descriptions of each option are included in Chapter III, Project Description, of the Draft EIR. Importantly, with either option, the newly constructed building would not exceed the height of the existing building at 1526 North Edgemont Street. There are no buildings or structures on the south slope of Olive Hill, south of the Hollyhock House, and therefore, no other buildings would have their settings affected by the construction of a new building at 1526 North Edgemont Street.

Because the Project would not impact the Hollyhock Houses' ability to convey its significance, the demolition, new construction, and multiple alterations to buildings on the Medical Center campus would not result in a substantial adverse change to the Hollyhock House and Barnsdall Art Park.

Comment No. C-9

The Department of Cultural Affairs is grateful to the Kaiser Permanente team for their continued communication with our staff throughout the Sunset Campus development process. We look forward to working together to ensure that the outstanding universal value and authenticity of Los Angeles's first-and-only UNESCO World Heritage site are protected for the benefit of all, including the local communities we serve.

Response to Comment No. C-9

This comment requests continuing communication between the Kaiser Permanente team and the Department of Cultural Affairs. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. Therefore, no further response is required at this time.

Comment Letter D

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Diamond Bar, CA 91765 - 4178

Comment No. D-1

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA) for the Proposed Project. The following comments include recommended revisions to the CEQA air quality analysis for regional construction impacts from cleanup activities and information on South Coast AQMD rules and permits that the Lead Agency should incorporate into the Final EIR.

South Coast AQMD Staff's Summary of Project Descriptions in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of demolition of 234,200 square feet of existing structures, and construction of 1,088,900 square feet of medical uses on 15.34 acres. Environmental Site Assessments and Subsurface Assessment Report have been prepared, indicating potential soil contamination with polychlorinated biphenyls and volatile organic compounds. As such, Mitigation Measures HAZ-1 through HAZ-4 require development of plans such as Disposal and Reuse Plan and Soil Management Plan to remove and clean up soil during construction.

Response to Comment No. D-1

The City acknowledges the comment and notes that it is introductory in nature, restates information contained in the Draft EIR, does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR, and does not discuss any adverse physical impact the Project may have on the environment. Note that this comment incorrectly states that there is potential soil contamination with polychlorinated biphenyls (PCBs); as discussed in Section IV.G, Hazards and Hazardous Materials, of the Draft EIR, potential PCBs containing materials is limited to existing building materials and not found in soils. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. No further response is thus required.

Comment No. D-2

South Coast AQMD Staff's Comments

Based on a review of the Draft EIR and supporting technical appendices, South Coast AQMD staff has two comments.

CEQA Air Quality Analysis for Regional Construction Impacts from Cleanup Activities

Based on Section IV.G, Hazards and Hazardous Materials, of the Draft EIR, soil cleanup activities are reasonably foreseeable and would be conducted during construction of the Proposed Project. The Lead Agency did not quantify emissions from cleanup activities in the Draft EIR. Cleanup activities will likely involve the use of heavy-duty, diesel-fueled trucks for soil export and result in emissions from vehicle trips by workers that will be required to conduct cleanup activities. Additionally, cleanup activities will likely require the use of additional equipment that may be different from typical equipment for grading and site preparation for construction. Since cleanup activities are reasonably foreseeable for the Proposed Project at the time the EIR is prepared, the Lead Agency should use good faith, best efforts to provide information on the scope, types, and duration of cleanup activities, quantify emissions from cleanup activities, and include those emissions in the Proposed Project's construction emissions profile to be compared to South Coast AQMD's air quality CEQA significance thresholds for construction to determine the level of significance in the Final EIR. Alternatively, if emissions from cleanup activities are not included in the Final EIR, the Lead Agency should provide reasons for not including them supported by substantial evidence in the record or consider including a new mitigation measure to commit to evaluating potential environmental impacts from cleanup activities under CEQA prior to commencing any cleanup activities.

Response to Comment No. D-2

This comment pertains to construction equipment assumptions related to excavation of potentially contaminated soils and requests that the emissions modeling be revised to reflect cleanup activities and emissions therefrom. Analysis of air quality emissions modeling and construction assumptions have in fact been prepared and are found in Section IV.B., Air Quality, and discussion of potentially contaminated soils is found in Section IV.G, Hazards and Hazardous Materials, of the Draft EIR.

As discussed in Section IV.G. of the Draft EIR, the Additional Subsurface Assessment Report, which was recommended to further evaluate volatile organic compounds (VOCs) at Site 1, identified the presence of benzene, ethylbenzene, and xylenes in soil vapor above regulatory screening levels (Appendix F-1). Historical operations at Site 1 included a gasoline/fueling station, resulting in residual impacts from gasoline. Due to the VOCs

observed in soil and soil vapor during the additional subsurface assessment, it was determined that the potential for vapor intrusion exists. Therefore, the Project could result in the accidental release of contaminated soils during construction, if discovered, at Site 1. Mitigation Measures MM-HAZ-3 and MM-HAZ-4 are required and would reduce this potentially significant impact to a less-than-significant level. No unique or special construction equipment that would cause emissions not already evaluated in the DEIR is anticipated to be required for excavation of these potentially contaminated soils.

The construction air quality analysis found in Section IV.B., Air Quality, of the Draft EIR included excavation of soils for the entire Project, including Site 1. The amount of soils assumed to be excavated (approximately 71,260 cubic yards) represents the maximum amount estimated to be removed from Site 1. Using the Los Angeles Regional Water Quality Control Board screening level for gasoline range organics (GRO) of 100 milligrams per kilogram (mg/kg), excavation of Site 1 would encounter approximately 4,000 cubic yards of GRO impacted soils. Therefore, the assumed excavation of Site 1 accounts for excavation of potentially contaminated soils. Several hazardous materials handling facilities are located within the soil haul truck trip length of 20 miles from the Project site assumed in the construction emissions modeling. As such, excavation and export of potentially contaminated soils and their associated potential emissions and other impacts are already included in the construction emissions modeling found in the Draft EIR and no revisions are necessary.

Comment No. D-3

South Coast AQMD Rules and Permits

Disturbing and excavating soils that may contain hydrocarbons or toxic air contaminants are subject to the requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, and Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants. The Lead Agency should discuss South Coast AQMD Rules 1166 and 1466 in Section IV.B., Air Quality, of the Draft EIR. If it is reasonably foreseeable at the time of the EIR is prepared that cleanup activities would involve the use of equipment that either emits or controls air pollution, South Coast AQMD staff should be consulted in advance to determine whether or not any permits or plans are required to be filed and approved by South Coast AQMD prior to the operation of such equipment, and to identify if any other South Coast AQMD Rules, such as Rule 431.2 – Sulfur Content of Liquid Fuels and Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines will be applicable and should be discussed in the Final EIR.

Operation of portable engines and portable equipment units of 50 brake horsepower or greater (>50bhp) that emit particulate matter requires a permit from South Coast AQMD

or registration under the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB). The Lead Agency should consult with South Coast AQMD's Engineering and Permitting staff to determine if there is any diesel-powered equipment during implementation that will require a South Coast AQMD permit or if the equipment will need to be registered under the PERP through CARB. If a permit from South Coast AQMD is required, South Coast AQMD is a Responsible Agency for the Proposed Project and should be identified in the Final EIR. Any assumptions used in the Air Quality Analysis in the Final EIR will be used as the basis for permit conditions and limits for the Proposed Project. Should there be any questions on permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB's webpage at: <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>.

Response to Comment No. D-3

This comment provides information regarding potential permits required for Project construction. The City and Kaiser Permanente will obtain all required permits and will coordinate with South Coast AQMD as necessary prior to construction of the Project. As previously noted, it is not presently anticipated that excavation and other activities will involve specialized equipment that would emit pollution. A summary of potential approvals required by agencies other than the City has been included in Chapter III, Project Description, page III-62, of the Draft EIR.

Comment No. D-4

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Lead Agency makes a finding that the recommended mitigation measures is not feasible, the Lead

Agency should describe the specific reasons supported by substantial evidence for rejecting it in the Final EIR (CEQA Guidelines Section 15091).

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov should you have any questions.

Response to Comment No. D-4

The City acknowledges this comment and notes that it summarizes requirements of CEQA and concludes the comment letter. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. No further response is required.

Comment Letter E

Dr. Mary Gallagher
LACC President
Los Angeles City College
855 North Vermont Ave.
Los Angeles, CA 90029

Comment No. E-1

I am writing on behalf of Los Angeles City College to express our full support for the Kaiser Permanente Los Angeles Medical Center (LAMC) expansion project.

Los Angeles City College empowers students from the diverse communities it serves to achieve their educational and career goals. We understand that students need additional resources outside of the classroom to help contribute to their success such as health & wellness, food, and housing assistance. Our organization is excited that Kaiser Permanente is proposing much-needed updates to its LAMC facilities.

Supporting the improvement of state-of-the-art healthcare facilities, like Kaiser Permanente LAMC, is crucial because it is essential to our public health. In addition, projects like this help stimulate economic growth and stability in the region. In light of the Covid-19 pandemic, it is clear how urgently this city needs to improve on both public health and economic stability. As an organization serving youth experiencing homelessness, we see the benefits that this facility will bring to the community both health-wise and economically.

After reviewing the DEIR, we continue to stand in strong support of this project. We hope that you consider our comments when evaluating this project and respectfully request the full approval of it. Thank you for your time and consideration.

Response to Comment No. E-1

The City acknowledges the comment and notes that it expresses support for the Project, but does not raise any issues concerning the adequacy of the Draft EIR or any physical impact the Project may have on the environment. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. No further response is required or provided.

Comment Letter F

William A. Bedrossian, MSW
CEO Covenant House California
Covenant House California
1325 N Western Ave.
Los Angeles, CA 90027

Comment No. F-1

I am writing on behalf of Covenant House California to express our support for the above-mentioned project. We are a non-profit that serves youth experiencing homelessness, by providing sanctuary through housing and support services to help them thrive. We are excited about Kaiser Permanente's proposal to expand and improve its Los Angeles Medical Center (LAMC) facilities.

Supporting the building, and improvement of state-of-the-art healthcare facilities, like Kaiser Permanente, is absolutely vital to, not only public health, but also economic stability. This project would generate a wide range of jobs across different industries, grow our healthcare workforce for future generations, bring innovation to our region's healthcare delivery system, and help stimulate economic growth to our local business and non-profit community.

As a non-profit organization working to address homelessness, we see the benefits that this project will bring to Hollywood. Kaiser Permanente has long been an active member in this community, supporting important community-based initiatives focused on homelessness, mental health, and substance abuse. In addition, staff and executive leadership have made themselves available for countless meetings and strategy sessions to problem-solve around public health and wellness efforts. We appreciate their continued devotion to increasing their ability to support the Hollywood community.

The findings in the DEIR have bolstered our support for this project. Improving the LAMC facilities is vital to Hollywood's public health and economic stability. We hope that you consider our support in evaluating this project and respectfully request the full approval of it. Thank you for your time and consideration.

Response to Comment No. F-1

The City acknowledges the comment and notes that it expresses support for the Project, but does not raise any issues concerning the adequacy of the Draft EIR or any physical impact the Project may have on the environment. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. No further response is required or provided.

Comment Letter G

Mel Culpepper
CEO
Boys & Girls Club of Hollywood
850 North Cahuenga Blvd.
Los Angeles, CA 90038

Comment No. G-1

I am writing on behalf of Boys & Girls Club of Hollywood to express our full support for the Kaiser Permanente Los Angeles Medical Center (LAMC) expansion project. We are a non-profit organization that has been providing academic enrichment programs to at-risk, low income and underprivileged students since 1937. Our mission is to "inspire and empower young people, especially those who need us most, to realize their full potential as productive, responsible, and caring adults." Our organization is excited that Kaiser Permanente is proposing much needed updates to its LAMC facilities.

Supporting the improvement of state-of-the-art healthcare facilities, like Kaiser Permanente LAMC, is crucial because it is essential to our public health. In addition, projects like this help stimulate economic growth and stability in the region. In light of the Covid-19 pandemic, it is clear how urgently this city needs to improve on both public health and economic stability. As an organization serving youth experiencing homelessness, we see the benefits that this facility will bring to the community both health-wise and economically.

After reviewing the DEIR, we continue to stand in strong support of this project. We hope that you consider our comments when evaluating this project and respectfully request the full approval of it. Thank you for your time and consideration.

Response to Comment No. G-1

The City acknowledges the comment and notes that it expresses support for the Project but does not raise any issues concerning the adequacy of the Draft EIR or any physical impact the Project may have on the environment. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. No further response is required or provided.

Comment Letter H

Rev. Kathy Cooper Ledesma
Senior Pastor
Hollywood United Methodist Church
6817 Franklin Avenue
Los Angeles, CA 90028

Comment No. H-1

I am writing on behalf of Hollywood United Methodist Church to express our full support for the Kaiser Permanente Los Angeles Medical Center (LAMC) expansion project. We are 100+ year stakeholders in the Hollywood Community. We admire Kaiser Permanente's continued devotion to investing in their campus and increasing their ability to better serve the Hollywood community.

It is vital to support the building and improvement of state-of-the-art healthcare facilities, like Kaiser Permanente LAMC, not only because they are essential to public health, but also because they would create a wide range of jobs across different industries, grow our healthcare workforce for generations, and bring innovation to our region's healthcare delivery system. As seen time and again throughout the Covid-19 pandemic, bolstering public health and economic growth is absolutely crucial to the community's wellbeing.

As the senior pastor of a large urban church, I see the benefits that this project would bring to Hollywood. Kaiser Permanente has long been an active member in this community, supporting important community-based initiatives addressing the homelessness, mental health, and substance abuse crises. They were crucial in addressing the HIV/AIDS epidemic decades ago, and continue to be leaders in health care in Los Angeles. We commend their efforts to increase their ability to better serve this community.

The findings in the DEIR have bolstered our support in this project. We hope that you consider our support in evaluating this project and respectfully request the full approval of it. Thank you for your time and consideration.

Response to Comment No. H-1

The City acknowledges the comment and notes that it expresses support for the Project but does not raise any issues concerning the adequacy of the Draft EIR or any physical impact the Project may have on the environment. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. No further response is required or provided.

Comment Letter I

Al Ballesteros, MBA
President and CEO
Wesley Health Centers – JWCH Institute
5650 Jillson St.
Commerce, CA 90040

Comment No. I-1

I am writing on behalf of JWCH Institute to express our full support of the above-mentioned project. We are a private non-profit health agency dedicated to increasing access to high-quality health care for the under-served and at-risk population in the Los Angeles area. As a fellow health services provider in the Hollywood community, we are excited about Kaiser Permanente’s proposal to expand and improve its Los Angeles Medical Center facilities.

It is vital to support the building and improvement of state-of-the-art healthcare facilities, like Kaiser Permanente LAMC, which is not only essential to public health, but would generate a wide range of jobs across different industries, grow our healthcare workforce for future generations, bring innovation to our region’s healthcare delivery system, and are stable drivers of economic opportunity to our local business and nonprofit community.

As a local non-profit and partner, we see the benefits that this facility will bring to the City to position and prepare us for economic growth and long-term success. Kaiser continues to be a strong partner in the community, and we commend their commitment to increasing their ability to provide high-quality health services to the community.

The findings in the DEIR have bolstered our support for this project. Kaiser has been an invaluable asset throughout this public health and economic crisis that we currently face. We respectfully request the full approval of this important project.

Response to Comment No. I-1

The City acknowledges the comment and notes that it expresses support for the Project but does not raise any issues concerning the adequacy of the Draft EIR or any physical impact the Project may have on the environment. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. No further response is required or provided.

Comment Letter J

Heather Carmichael
Executive Director
My Friend's Place
5850 Hollywood Blvd
Los Angeles, CA 90028

Comment No. J-1

I am writing on behalf of My Friend's Place to express our full support for the Kaiser Permanente Los Angeles Medical Center (LAMC) expansion project. We are a non-profit organization that has provided various services and outreach to youth experiencing homelessness in the Hollywood community for 33 years. Our organization is excited that Kaiser Permanente is proposing much-needed updates to its LAMC facilities.

Supporting the improvement of state-of-the-art healthcare facilities, like Kaiser Permanente LAMC is crucial because it is essential to our public health. In addition, projects like this help stimulate economic growth and stability in the region. In light of the Covid-19 pandemic, it is clear how urgently this city needs to improve on both public health and economic stability. As an organization serving youth experiencing homelessness, we see the benefits that this facility will bring to the community both health-wise and economically.

After reviewing the DEIR, we continue to stand in strong support of this project. We hope that you consider our comments when evaluating this project and respectfully request the full approval of it. Thank you for your time and consideration.

Response to Comment No. J-1

The City acknowledges the comment and notes that it expresses support for the Project but does not raise any issues concerning the adequacy of the Draft EIR or any physical impact the Project may have on the environment. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. No further response is required or provided.

Comment Letter K

Britney Weissman
Executive Director
Hollywood 4ward
6255 Sunset Blvd., Suite #150
Hollywood, CA 90028

Comment No. K-1

I write on behalf of Hollywood 4WRD to express our full support for the Kaiser Permanente Los Angeles Medical Center (LAMC) expansion. We are a community-run coalition of Hollywood stakeholders organizing to end homelessness in our community through advocacy, education, service coordination, and innovation. We are excited that Kaiser Permanente could be expanding its LAMC campus and building much-needed upgrades to its facilities.

Supporting the improvement of state-of-the-art health care facilities, like Kaiser Permanente, is vital to Hollywood's public health. Additionally, projects like this would create a wide range of jobs across different industries and help stimulate Hollywood's economy for years to come. Our public health and economic stability are essential for Hollywood's continued growth towards becoming a more thriving community.

Kaiser Permanente has been an invaluable supporter of Hollywood 4WRD and our mission to affect systemic change addressing homelessness. The initial funding Kaiser Permanente provided when Hollywood 4WRD first started in 2008 was critical in building our organization. We appreciate their continued devotion to increasing their ability to support the Hollywood community.

After reviewing the DEIR, we continue to stand in strong support of this project. We hope that you consider our comments when evaluating this project and respectfully request the full approval of it. Thank you for your time and consideration.

Response to Comment No. K-1

The City acknowledges the comment and notes that it expresses support for the Project but does not raise any issues concerning the adequacy of the Draft EIR or any physical impact the Project may have on the environment. This comment is noted for the record and will be forwarded to the decision-maker for their review and consideration. No further response is required or provided.

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III. Revisions, Clarifications, and Corrections to the Draft EIR

This section of the Final EIR provides changes to the Draft EIR that have been made to revise, clarify, or correct the environmental impact analysis for the Kaiser Permanente Los Angeles Medical Center Project (Project). Such changes are the result of proposed refinements to the Project proposed by the Applicant, public and agency comments received in response to the Draft EIR, and/or additional information that has become available since publication of the Draft EIR. The changes described in this section do not result in any new significant environmental impacts or a substantial increase in the severity of any significant impacts identified in the Draft EIR.

This section is divided into two parts: Section III.1, Corrections and Additions to the Draft EIR Sections and Appendices; and Section III.2, Effect of Corrections and Revisions.

1. Corrections and Additions to Draft EIR Sections and Appendices

Changes have been made to the Draft EIR as a result of public and agency comments received in response to the Draft EIR and/or new information that has become available since publication of the Draft EIR. Deletions are shown in ~~striketrough~~ text and additions are shown in underlined text. Such changes are presented in this EIR Section.

I. Executive Summary

Chapter I, Executive Summary, Table I-1, pages I-62 through 64, add the following text:

PDF-TRF-1: The following measures shall be implemented as part of the Construction Staging and Traffic Management Plan (CSTMP), to be prepared by Kaiser Permanente:

1. Provide advanced notification to adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction. Provide a posted sign on the Project Site with hotline information for adjacent property owners to call and address specific issues or activities that may potentially cause problems at on- and off-site locations.

2. Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses.
3. Coordinate with public transit agencies to provide advanced notifications of any temporary stop relocations and durations and follow all safety required procedures required by the concerned agency, including returning temporarily modified transit facilities to pre-Project construction conditions.
4. Limit any potential roadway lane closure/s to off-peak travel periods, to the extent feasible.
5. Provide traffic control for any potential roadway lane closure, detour, or other disruption to traffic circulation.
6. To the extent feasible, store any construction equipment within the perimeter fence of the construction site. Should temporary storage of a large piece of equipment be necessary outside of the perimeter fence (e.g., within a designated lane closure area), that area must comply with City-approved detour/traffic control plans.
7. Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers, including compliance with Americans with Disabilities Act requirements.
8. Identify and require the routes that construction vehicles would use for the delivery of construction materials (e.g., lumber, tiles, piping, windows), to access the Project Site, traffic controls and detours, and proposed construction phasing plan for the Project.
9. Require Kaiser Permanente to keep all haul routes adjacent to the Project Site clean and free of debris including, but not limited to, gravel and dirt as a result of its operations.
10. Schedule delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods, to the extent possible. No hauling or transport shall be allowed during nighttime hours, Sundays, or federal holidays unless required by the California Department of Transportation (Caltrans) or City of Los Angeles Department of Transportation (LADOT).
11. Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities, if needed.

12. Haul trucks entering or exiting public streets shall at all times yield to public traffic.
13. Construction-related parking and staging of vehicles shall occur on site to the extent possible, but may occur on nearby public parking lots, as approved by the City.
14. Coordinate deliveries to reduce the potential of trucks waiting to unload for protracted periods of times.
15. Prohibit parking by construction workers on adjacent streets and direct construction workers to available/designated parking areas within and adjacent to the Project Site.
16. The CSTMP shall meet standards established in the current California Manual on Uniform Traffic Control Device as well as City of Los Angeles requirements.

II. Environmental Setting

No corrections or additions have been made to this section of the Draft EIR.

III. Project Description

Chapter III, Project Description, page III-62, add the following text:

Other public agencies (i.e. responsible and/or trustee agencies), whose approval may be required for specific components of Project implementation include, but are not limited to, the South Coast Air Quality Management District, the California Department of Transportation, and the Los Angeles County Metropolitan Transportation Authority.

IV.A. Aesthetics

Section IV.A, Aesthetics, page IV.A-33, add the following text:

The view study consisted of evaluating existing views available from five discrete publicly accessible and not publicly accessible vantage points at the Hollyhock House and Barnsdall Art Center and three-dimensional representations of the approximate building envelopes of proposed development on the Project Site.

Section IV.A, Aesthetics, page IV.A-40, add the following text:

The publicly accessible western turf area at Barnsdall Art Park, and not publicly accessible roof, publicly accessible patio, and other publicly accessible and not publicly accessible outdoor areas along the south-facing elevation of Hollyhock House, provide opportunities for long (albeit narrow) views to the west and southeast.

Section IV.A, Aesthetics, page IV.A-40, revise the following text:

Public vViews from Barnsdall Art Park to the south are generally obstructed by hospital development (approximately 130 feet tall) at 4867 Sunset Boulevard Sunset.

Section IV.A, Aesthetics, page IV.A-40, add the following text:

To demonstrate anticipated Project effects to publicly accessible and not publicly accessible views from Barnsdall Art Park (specifically, from Hollyhock House and the Administration Building), P+W Architecture prepared a view study that conceptually illustrates the massing and scale of proposed building envelopes on Sites 4 and 5.

Section IV.A, Aesthetics, page IV.A-49, Figure IV.A-11 revise caption of upper left figure to the following text:

ABOVE: View southwest from publicly accessible yard below patio (without trees)

Section IV.A, Aesthetics, page IV.A-49, Figure IV.A-11 revise caption of lower right figure to the following text:

Below: View southwest from not publicly accessible living room roof (without trees)

Section IV.A, Aesthetics, page IV.A-49, Figure IV.A-11 revise caption of middle right figure to the following text:

ABOVE: View southwest from not publicly accessible library roof (without trees)

Section IV.A, Aesthetics, page IV.A-49, Figure IV.A-12 revise the following text revise caption of middle left figure to the following text:

ABOVE: View southeast from roof of Hollyhock House publicly accessible master bedroom (without trees)

Section IV.A, Aesthetics, page IV.A-49, Figure IV.A-12 revise the following text revise caption of middle right figure to the following text:

ABOVE: View southeast from publicly accessible admin building balcony (without trees)

Section IV.A, Aesthetics, page IV.A-55, revise the following text:

As shown on Figure IV.A-11, existing scenic views from southwest-facing publicly accessible and not publicly accessible outdoor areas of the Hollyhock House are generally narrow (i.e., available through gaps in trees or development) due to the presence of tall landscaping trees and existing development in the immediate surrounding area. Figure IV.A-11 also demonstrates the approximate massing and scale of the redevelopment of Site 4 (1526 Edgemont Street) with a 105-foot-tall MOB. As shown in the figure, redevelopment of Site 4 would not substantially affect the quality or length of the existing southwesterly publicly accessible and not publicly accessible views from Hollyhock House. Further, the 105-foot-tall MOB would not result in incompatible visual features as nearby development consists of medical office and hospital development of similar scale and mass. Also, redevelopment of Site 3 would be visible from the publicly accessible Hollyhock House yard (see Figure IV.A-11, View A). However, since the existing MOB at Site 3 is 87 feet tall, and redevelopment would entail a new, up to 90-foot-tall MOB, views from the publicly accessible yard area at Hollyhock House would not be substantially altered (i.e., redevelopment would result in a similar building profile as viewed from the publicly accessible Hollyhock House yard). Lastly, due to the presence of existing tall development to the southwest, redevelopment of Site 6 would not be visible from the publicly accessible yard and not publicly accessible library roof and if visible, would not result in view obstruction or substantial view alteration as experienced from the living room roof, which is not publicly accessible.

The quality of existing views to the southeast from the Hollyhock House master bedroom balcony (not publicly accessible) and Barnsdall Art Park Administration Building balcony (publicly accessible) are illustrated on Figure IV.A-12. As demonstrated in the figure, available publicly accessible and not publicly accessible views are generally short in length due to park landscaping and nearby development; however, distant buildings are visible beyond existing parking structure development from the Administration Building balcony (publicly accessible). See View E, Figure IV.A-12. The approximate massing and building envelope of redeveloped Site 5 is depicted on Figure IV.A-12 and demonstrates that the proposed parking structure (105 feet tall) at 1517 North Vermont Boulevard would not result in view obstruction from publicly accessible locations or an incompatible visual feature. Rather, Site 5 redevelopment would be experienced as an extension of the existing parking structure to the immediate east of the site and would be partially blocked from existing publicly accessible views by existing park landscaping. From these locations, redevelopment of Site 2 would have limited visibility and would not result in substantial alteration of the existing views from publicly accessible and not publicly accessible locations. Lastly, redevelopment of Site 1 with an approximate 130-foot-tall MOB would not be visible from these vantage points due the presence of existing hospital and MOB development (and park landscaping) that would screen the new development from view at publicly accessible locations.

In summary, the proposed Project would not substantially obstruct or impede existing southwesterly, southerly, or southeasterly views from publicly accessible and not publicly accessible locations in and around Hollyhock House or the Barnsdall Art Park Administration Building. Also, as no development is proposed to the immediate west of Barnsdall Art Park, the proposed Project would not affect existing long westerly views available from the from publicly accessible locations at Barnsdall Art Park. Thus, the proposed Project would not result in a substantial adverse effect on scenic vistas/views available from publicly accessible locations at Barnsdall Art Park. Furthermore, pursuant to California PRC Section 21099(d)(1) and ZI No. 2452, scenic vista impacts of an employment center project located on an infill site within a TPA shall not be considered significant impacts on the environment.

IV.B. Air Quality

No corrections or additions have been made to this section of the Draft EIR.

IV.C. Biological Resources

No corrections or additions have been made to this section of the Draft EIR.

IV.D. Cultural Resources

Section IV.D, Cultural Resources, page IV.D-35, revise the following text:

The Aline Barnsdall Complex (NR no. 71000143; P-19-167173) is a large park complex on Olive Hill, with several buildings, including the Hollyhock House, designed by master architects Frank Lloyd Wright, Rudolph Schindler, and Richard Neutra. The complex was listed in the NRHP under Criteria A and C, and as a National Historic Landmark under Criterion C for being Frank Lloyd Wright's first commission in Los Angeles; for the Hollyhock House design, a "high profile benchmark in the evolution of American Domestic space planning, for which Wright adopted and synthesized certain characteristics strongly associated with California houses"; and for being a pivotal project in Wright's career.¹ The Hollyhock House and the surrounding hill, at the time called Barnsdall Art Park, as well as Residence 'A' on the property, were designated City of Los Angeles Historic-Cultural Monuments No. 34 and No. 33, respectively, in 1965. Hollyhock House was inscribed on the UNESCO World Heritage List in 2016. The boundary for the UNESCO inscription of Hollyhock House was established in 2016 and follows the boundary defined in the NHL nomination. An updated inscription was completed in 2019 as part of a serial nomination for

¹ J. Herr, Aline Barnsdall Complex, National Register of Historic Places and National Historic Landmarks Inventory Form, 2005, pg. 4.

The 20th-Century Architecture of Frank Lloyd Wright.² The UNESCO Buffer Zone of Hollyhock House was established in the updated inscription (2019) and consists of the Aline Barnsdall Complex and the surrounding urban area below Olive Hill that is bounded by Hollywood Boulevard, West Sunset Boulevard, North Vermont Avenue, and North Edgemont Street. The footprints of Site 4 and Site 5 of the Project are within the Buffer Zone.

Though the Aline Barnsdall Complex's overall landscape is also considered important for the important vistas present when Aline Barnsdall gifted the property to Los Angeles, the setting of the Aline Barnsdall Complex has been altered since its period of significance 1900–through 1924, and since the date it was gifted to the City of Los Angeles, 1927. The west-facing viewshed towards the ocean, particularly from the ~~contributing structure~~ publicly accessible “Schindler Terrace,” was identified in the National Historic Landmark inventory form as the principal viewshed. The south viewshed from the Hollyhock House would be affected by proposed Project activities at Site 5, which include the demolition of the seven-story hospital building at 1526 North Edgemont Street. In the later phases of the Project, the south viewshed would also be affected by the proposed reconstructed buildings and additions to existing buildings on the Medical Center campus. The south viewshed is not specifically mentioned in the National Historic Landmark or NRHP nomination form but has been altered by the addition and demolition of several modern Medical Center hospital buildings, and has presumably been altered since the Medical Center campus was established in 1953. There are ~~no contributing or non-contributing~~ buildings on the south slope of Olive Hill, south of the Hollyhock House, and therefore no other ~~contributing or non-contributing~~ buildings elements of this historical resources would have their settings affected.

Section IV.D, Cultural Resources, page IV.D-42, revise and add the following text:

Though the Aline Barnsdall Complex's overall landscape is also considered important for the important vistas present when Aline Barnsdall gifted the property to Los Angeles, the setting of the Aline Barnsdall Complex has been altered since its period of significance from 1900 through 1924 and since it was gifted to the City of Los Angeles in 1927. The west-facing viewshed towards the ocean, particularly from the ~~contributing structure~~ publicly accessible “Schindler Terrace,” was identified in the National Historic Landmark inventory form as the principal viewshed and would not be impacted by the Project's planned activities, because the proposed Project activity lies south of the Schindler Terrace, not west where the principal viewshed is located. Therefore, the key vista that supports the complex's ability to convey its significance would not be affected. The south viewshed from the Hollyhock House would be affected by proposed Project activities at Site 4, which include demolition of the eight-story hospital building at 1526 North Edgemont Street. In the later phases of the Project, the south

² The 20th-Century Architecture of Frank Lloyd Wright is a serial nomination that refers to structures designed by the American architect Frank Lloyd Wright (1867-1959), spanning the years 1905-1959 and located in six states across the United States of America.

viewshed would also be affected by the proposed new construction and additions to existing buildings on the Medical Center campus. However, the south viewshed is not specifically mentioned in the National Historic Landmark or NRHP nomination form. Moreover, the south viewshed has already been materially altered since the period of significance by the addition and demolition of multiple three- to eight-story MOB's along Sunset Boulevard between 1953 and present (2019), and presumably had already been altered prior to the establishment of the medical campus in 1953. The building at 1526 North Edgemont Street is 105 feet in height above grade, and the Project would replace it with either another 105-foot-tall building (Option A), or a slightly smaller 100-foot-tall building (Option B). Complete descriptions of each option are included in Chapter III, Project Description, of the Draft EIR. With either option, the newly constructed building would not exceed the height of the existing building at 1526 North Edgemont Street. The Project does not propose to exceed existing heights and conforms with the UNESCO inscription of limitations within the Buffer Zone. There are no ~~contributing or non-contributing~~ buildings or structures on the south slope of Olive Hill, south of the Hollyhock House, and therefore, no ~~other contributing or non-contributing buildings~~ elements of Barnsdall Park that convey its significance would have their settings affected by the construction of a new building at 1526 North Edgemont Street.

Because the Project would not impact the complex's ability to convey its significance, the demolition, new construction, and multiple alterations to buildings on the Medical Center campus would not result in a substantial adverse change to the Aline Barnsdall Complex.

IV.E. Geology and Soils

No corrections or additions have been made to this section of the Draft EIR.

IV.F. Greenhouse Gas Emissions

No corrections or additions have been made to this section of the Draft EIR.

IV.G. Hazards and Hazardous Materials

No corrections or additions have been made to this section of the Draft EIR.

IV.H. Hydrology and Water Quality

No corrections or additions have been made to this section of the Draft EIR.

IV.I. Land Use and Planning

No corrections or additions have been made to this section of the Draft EIR.

IV.J. Noise

No corrections or additions have been made to this section of the Draft EIR.

IV.K. Population and Housing

No corrections or additions have been made to this section of the Draft EIR.

IV.L.1 Public Services – Fire Protection

No corrections or additions have been made to this section of the Draft EIR.

IV.L.2 Public Services – Police Protection

No corrections or additions have been made to this section of the Draft EIR.

IV.L.3 Public Services – Schools

No corrections or additions have been made to this section of the Draft EIR.

IV.L.4 Public Services – Parks and Recreation

No corrections or additions have been made to this section of the Draft EIR.

IV.L.5 Public Services – Libraries

No corrections or additions have been made to this section of the Draft EIR.

IV.M. Transportation

Section IV.M, Transportation, pages IV.M-34 and -35, add the following text:

PDF-TRF-1: The following measures shall be implemented as part of the Construction Staging and Traffic Management Plan (CSTMP), to be prepared by Kaiser Permanente:

17. Provide advanced notification to adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction. Provide a posted sign on the Project Site with hotline information for adjacent property owners to call and address specific issues or activities that may potentially cause problems at on- and off-site locations.

18. Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses.
19. Coordinate with public transit agencies to provide advanced notifications of any temporary stop relocations and durations and follow all safety required procedures required by the concerned agency, including returning temporarily modified transit facilities to pre-Project construction conditions.
20. Limit any potential roadway lane closure/s to off-peak travel periods, to the extent feasible.
21. Provide traffic control for any potential roadway lane closure, detour, or other disruption to traffic circulation.
22. To the extent feasible, store any construction equipment within the perimeter fence of the construction site. Should temporary storage of a large piece of equipment be necessary outside of the perimeter fence (e.g., within a designated lane closure area), that area must comply with City-approved detour/traffic control plans.
23. Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers, including compliance with Americans with Disabilities Act requirements.
24. Identify and require the routes that construction vehicles would use for the delivery of construction materials (e.g., lumber, tiles, piping, windows), to access the Project Site, traffic controls and detours, and proposed construction phasing plan for the Project.
25. Require Kaiser Permanente to keep all haul routes adjacent to the Project Site clean and free of debris including, but not limited to, gravel and dirt as a result of its operations.
26. Schedule delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods, to the extent possible. No hauling or transport shall be allowed during nighttime hours, Sundays, or federal holidays unless required by the California Department of Transportation (Caltrans) or City of Los Angeles Department of Transportation (LADOT).
27. Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities, if needed.

28. Haul trucks entering or exiting public streets shall at all times yield to public traffic.
29. Construction-related parking and staging of vehicles shall occur on site to the extent possible, but may occur on nearby public parking lots, as approved by the City.
30. Coordinate deliveries to reduce the potential of trucks waiting to unload for protracted periods of times.
31. Prohibit parking by construction workers on adjacent streets and direct construction workers to available/designated parking areas within and adjacent to the Project Site.
32. The CSTMP shall meet standards established in the current California Manual on Uniform Traffic Control Device as well as City of Los Angeles requirements.

IV.N. Tribal Cultural Resources

No corrections or additions have been made to this section of the Draft EIR.

IV.O.1 Utilities and Service Systems – Water Supply and Infrastructure

Section IV.O.1, Utilities and Service Systems – Water Supply and Infrastructure, page IV.O.1-31, revise the following text:

Water conservation features include a range of techniques that enhance site sustainability. **PDF-HYD-1** through **PDF-HYD-18** will also be incorporated into the Project to reduce potentially significant impacts related to water supply.

IV.O.2 Utilities and Service Systems – Wastewater

No corrections or additions have been made to this section of the Draft EIR.

IV.O.3 Utilities and Service Systems – Solid Waste

No corrections or additions have been made to this section of the Draft EIR.

IV.O.4 Utilities and Service Systems – Electric Power, Natural Gas, and Telecommunications

No corrections or additions have been made to this section of the Draft EIR.

IV.P. Energy Consumption and Conservation

No corrections or additions have been made to this section of the Draft EIR.

V. Alternatives

No corrections or additions have been made to this section of the Draft EIR.

VI. Other CEQA Considerations

No corrections or additions have been made to this section of the Draft EIR.

VII. References

No corrections or additions have been made to this section of the Draft EIR.

VIII. Acronyms and Abbreviations

No corrections or additions have been made to this section of the Draft EIR.

IX. Preparers of the EIR

No corrections or additions have been made to this section of the Draft EIR.

2. Effect of Corrections and Revisions

CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5), but before the EIR is certified. Section 15088.5 of the CEQA Guidelines specifically states:

- (a) *“...New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to*

implement. ‘Significant new information’ requiring recirculation include, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
 - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.*
 - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.*
 - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.”*
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.*

No significant new information has been added to the Draft EIR in response to comments received during the public comment and review period for the Draft EIR or to incorporate additional information that became available following the Draft EIR’s publication. Therefore, the additions and corrections contained in this section and the information contained in Chapter II, Responses to Comments, of this Final EIR, clarify, amplify, or make insignificant changes to the Draft EIR. In addition, Chapter II, Responses to Comments, of this Final EIR, considers and responds to the comments that state that the Project would have significant impacts not disclosed in the Draft EIR and explains why none of these comments provided substantial evidence that the Project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR. Rather, the additions and corrections to the Draft EIR address typographical errors, provide minor revisions, and augment the analysis of the Draft EIR; they would not result in new significant impacts or an increase in any impact already identified in the Draft EIR. Thus, none of the conditions in CEQA Guidelines Section 15088.5 are met, and recirculation of the Draft EIR is not required.

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IV. Mitigation Monitoring Program

1. Introduction

This Mitigation Monitoring Program (MMP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a “reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

An Environmental Impact Report (EIR) has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project’s impacts in the EIR takes into consideration the project design features (PDF) and applies mitigation measures (MM) needed to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs identified for the Project.

2. Organization

As shown on the following pages, each identified project design feature and mitigation measure for the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- **Enforcement Agency:** the agency with the power to enforce the PDF or MM.
- **Monitoring Agency:** the agency to which reports involving feasibility, compliance, implementation, and development are made.
- **Monitoring Phase:** the phase of the Project during which the PDF or MM shall be monitored.

- **Monitoring Frequency:** the frequency at which the PDF or MM shall be monitored.
- **Action Indicating Compliance:** the action by which the Enforcement or Monitoring Agency indicates that compliance with the identified PDF or required MM has been implemented.

3. Administrative Procedures and Enforcement

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each PDF and MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request.

During the construction phase and prior to the issuance of permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the City of Los Angeles Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the City of Los Angeles Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

4. Program Modification

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval, finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not in and of itself require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

5. Mitigation Monitoring Program

The following project design features and mitigation measures are applicable to both the Project and the Increased commercial Flexibility Option (Flexibility Option).

A. Aesthetics

(1) Project Design Features

PDF-AES-1 Construction and operational lighting, including vehicle headlights within new parking structures, will be shielded and/or directed downward (or on the specific on-site feature to be lit) in such a manner as to preclude light pollution or light trespass onto adjacent uses that would cause more than two foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors of existing and anticipated future adjacent uses.

Monitoring Phase:	Construction and operations
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety; and City of Los Angeles Bureau of Street Lighting

Monitoring Frequency: During construction and operation

Action Indicating Compliance: Plan check approval and approval of new street lighting plan

PDF-AES-2 Where Project construction is visible from pedestrian locations adjacent to the Project Site, temporary construction fencing will be placed along the periphery of all Building Sites to screen construction activity from view at the street level. For Building Sites located near the Metro stations (Site 1 and Site 5), wooden construction fencing shall be installed at the boundary of the areas with public access. Pursuant to the Metropolitan Transportation Authority (Metro) Adjacent Construction Design Manual, fencing would be at least 8 feet high and meet all applicable code requirements.

Monitoring Phase: Construction

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Frequency: During construction

Action Indicating Compliance: Daily visual inspections

PDF-AES-3 Kaiser Permanente will ensure, through appropriate postings and daily visual inspections, that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

Monitoring Phase: Construction

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles

City of Los Angeles Department of
Building and Safety

Monitoring Frequency: During construction

Action Indicating Compliance: Daily visual inspections

PDF-AES-4 Glass used in building façades will be anti-reflective or treated with an anti-reflective coating to minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the California Energy Code requirements shall be permitted.

Monitoring Phase: Construction

Enforcement Agency: City of Los Angeles Department of
Building and Safety

Monitoring Agency: City of Los Angeles Department of
City Planning; City of Los Angeles
Department of Building and Safety

Monitoring Frequency: During construction

Action Indicating Compliance: Plan check approval and issuance
of applicable building permit

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

B. Air Quality

(1) Project Design Features

PDF-AIR-1 All architectural coatings applied on the interior or exterior of Project structures must be in compliance with South Coast Air Quality Management District Rule 1113 and have a volatile organic compound (VOC) content of 50 grams of VOC per liter of coating or less, less water and exempt compounds.

Monitoring Phase: Construction

Enforcement Agency: City of Los Angeles Department of Building and Safety; South Coast Air Quality Management District

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Frequency: During architectural coating phase(s) of construction

Action Indicating Compliance: Field inspection sign-off

PDF-AIR-2 The Project will include construction dust control strategies in compliance with South Coast Air Quality Management District (SCAQMD) Rule 403, compliance with which will be identified on grading plan approvals. In addition to SCAQMD Rule 403, the following dust control best management practices will be implemented during Project construction:

- a. Dirt and debris spilled onto paved surfaces at the project site and on the adjacent roadways will be swept, vacuumed, and/or washed at the end of each workday.
- b. All trucks hauling dirt, sand, soil, or other loose material to and from the construction site will be covered and/or a minimum 2 feet of freeboard will be maintained.

Monitoring Phase: Construction

Enforcement Agency: City of Los Angeles Department of Building and Safety; South Coast Air Quality Management District

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Frequency: Prior to issuance of grading permit; daily field inspection

Action Indicating Compliance: Approval of grading plan and issuance of grading permit; field inspection sign-off

PDF-AIR-3 Where power poles are available, electricity from power poles and/or solar-powered generators rather than temporary diesel or gasoline generators will be used during construction.

Monitoring Phase:	Construction
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Prior to construction
Action Indicating Compliance:	Approval of construction plans

PDF-AIR-4 The Project will be designed to enhance the walkability of the Project Site, through methods including pedestrian-level wayfinding signage, landscaping, and lighting along pedestrian walkways, outdoor seating areas, and shade trees.

Monitoring Phase:	Pre-construction/Planning
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Ongoing during plan review
Action Indicating Compliance:	Inclusion as a Condition of Approval for the Project; Plan check approval

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

C. Biological Resources

(1) Project Design Features

PDF-BIO-1 Migratory and Nesting Birds. Prior to issuance of a grading permit, Kaiser Permanente shall demonstrate the following requirements have been included in the Project construction Plan:

1. Any construction activities that occur during the nesting season (i.e., January 15 through August 31) shall require that all suitable habitat (i.e., street trees and shrubs) be surveyed for the presence of nesting birds by a qualified biologist, retained by the Applicant as approved by the City of Los Angeles Building and Safety, before commencement of clearing and prior to grading permit issuance. The qualified biologist shall conduct a minimum of two pre-construction surveys for nesting birds 5 days apart to identify any active nesting locations in and near the Project Site. Pre-construction surveys shall be conducted no more than three days prior to Project construction. The survey would consist of full coverage of the proposed Project footprint and an appropriate buffer, as determined by the biologist. If no occupied nests are found, no additional steps would be required. A copy of the pre-construction surveys shall be submitted to the City of Los Angeles Building and Safety.
2. If nests are found being used for breeding or rearing young by a native bird, the nest locations shall be mapped by the biologist using Global Positioning System (GPS) equipment. The species of the nesting bird and, to the degree feasible, the nesting stage (e.g., incubation of eggs, feeding of young, near fledging) would be documented. The biologist may establish an avoidance buffer around occupied nests if there is a significant potential for take of the species or potential for inadvertent destruction of the nest. The buffer shall be determined by the qualified biologist based on the biology of the species present and surrounding habitat (typically a starting point of 300 feet for most birds and 500 feet for raptors but may be reduced as approved by the biologist). No construction or ground-disturbing activities shall be conducted within the buffer until the biologist has determined that the nest is no longer being used for breeding or rearing and has informed the construction supervisor that activities may resume.

Monitoring Phase: Pre-construction

Enforcement Agency: Angeles California Department of Fish and Wildlife; City of Los

Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Frequency: Prior to start of construction; as determined by a qualified biologist

Action Indicating Compliance: Approval of construction plan

PDF-BIO-2 Replacement Tree Monitoring. An independent certified arborist shall monitor all tree plantings over a 3-year monitoring effort. This monitoring effort shall consider growth, health, and condition of the subject trees to evaluate the planting success. The monitoring effort may result in a recommendation of remedial actions (i.e., supplemental irrigation or fertilization) should any of the tree plantings exhibit poor or declining health.

Monitoring Phase: Operation

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Frequency: Evaluations over a 3-year monitoring effort as determined by independent certified arborist

Action Indicating Compliance: Evaluations complete by certified arborist

PDF-BIO-3 Fencing (Parkway Trees). To the satisfaction of Urban Forestry Division and prior to commencing construction activities, the protected parkway trees that would remain after Project construction shall be wrapped with 2 inches of orange plastic fencing from the ground to the first branch and overlaid with 2-inch-thick wooden slats that are bound securely (slats shall not be allowed to dig into the bark). During installation of the plastic fencing, caution shall be used to avoid damaging branches. Major scaffold limbs may also require plastic fencing as directed by the Certified Arborist.

Tree fences shall be erected before demolition, grading, or construction begins and remain until final inspection of the Project. "Warning" signs shall

be prominently displayed on each protective fence. The signs shall be a minimum of 8.5 inches by 11 inches and clearly state the following:

ENTRY PROHIBITED
TREE PROTECTION ZONE

This Fence Shall Not be Removed

Monitoring Phase:	Pre-construction and Construction
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Bureau of Street Services – Urban Forestry Divisions; City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Prior to construction and daily visual inspection
Action Indicating Compliance:	Monitoring agency to confirm compliance prior to construction

PDF-BIO-4 Fencing (Protected Oak Tree). Prior to commencing construction activities, a chain-link fence shall be erected around the protected oak tree that would remain after Project construction. The fence shall be no less than 4 feet high, and tree protection signs (as shown in Project Design Feature **PDF-BIO-3**) shall be erected around all undisturbed protected trees (or tree groups), and undisturbed on-site trees. The protective fence shall be installed 5 feet beyond the tree canopy dripline boundary of each tree (or tree group) (“protected zone”). A qualified arborist shall be required on site if grading activities occur within the tree’s protected zone. The fencing shall be secured to 6-foot-tall, heavy gauge T-bar line posts, pounded in the ground a minimum of 18 inches and spaced a minimum of 8 feet on-center. Fencing shall be attached to T-bar posts with minimum 14-gage wire fastened to the top, middle, and bottom of each post. Tree protection signs shall be attached to every fourth post. The contractor shall maintain the fence to keep it upright, taut, and aligned at all times. Fencing shall be removed only after all construction activities are complete.

Monitoring Phase:	Pre-construction and construction
Enforcement Agency:	City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Bureau of Street Services – Urban Forestry Divisions; City of Los Angeles Department of Building and Safety

Monitoring Frequency: Pre-construction, inspections during construction as determined by qualified arborist

Action Indicating Compliance: Approval of construction plans; field inspection sign-off

PDF-BIO-5 Pre-Construction Meeting. A pre-construction meeting shall be held between all contractors and subcontractors (e.g., grading, tree removal/pruning, and builders) and a qualified arborist. The meeting shall focus on instructing the contractors and subcontractors on tree protection practices and answering any questions. All equipment operators and spotters, assistants, or those directing operators from the ground, shall provide written acknowledgement of receiving tree protection training. This training shall include information on the location and marking of protected trees, the necessity of preventing damage, and the discussion of work practices that shall accomplish these tasks.

Monitoring Phase: Pre-construction

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Frequency: Pre-construction

Action Indicating Compliance: Field sign-off upon completion of meeting

PDF-BIO-6 Equipment Operation and Storage. Contractors and subcontractors shall avoid heavy equipment operation around the protected trees. The on-site qualified arborist shall mark those areas around the protected trees, as necessary, to indicate protected root zones. All heavy equipment and vehicles shall, at minimum, stay out of the fenced protected tree zone and out of the root protected zones unless where specifically approved in writing and under the supervision of a qualified arborist.

Monitoring Phase:	Construction
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Bureau of Street Services – Urban Forestry Divisions; City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Pre-construction, during construction as determined by qualified arborist
Action Indicating Compliance:	Field inspection sign-off

PDF-BIO-7 Materials Storage and Disposal. Contractors and subcontractors shall not store or discard any supplies or materials (e.g., paint, lumber, and concrete overflow) within the protected zone and shall remove all foreign debris within the protected zone. However, the contractors and subcontractors shall leave the duff, mulch, chips, and leaves around the retained trees for water retention and nutrient supply. In addition, the contractors and subcontractors shall avoid draining or leakage of equipment fluids near retained trees. Fluids, such as gasoline, diesel, oils, hydraulics, brake and transmission fluids, paint, paint thinners, and glycol (antifreeze), shall be disposed of properly. The contractors and subcontractors shall ensure that equipment be parked at least 50 feet from the protected zone to avoid the possibility of leakage of equipment fluids into the soil. The effect of toxic equipment fluids on the retained trees could result in tree decline and/or mortality.

Monitoring Phase:	Construction
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety; City of Los Angeles Bureau of Street Services – Urban Forestry Divisions
Monitoring Frequency:	Daily visual inspection
Action Indicating Compliance:	Field inspection sign-off

PDF-BIO-8 Grade Changes. Contractors and subcontractors shall ensure that grade changes, including adding fill, shall not be permitted within the protected tree and root zones without special written authorization and under supervision of a qualified arborist. Contractors shall ensure that grade changes made outside of the protected tree zone shall not create conditions that allow water to pond at the base of the tree. Water trapped at the base of a tree could lead to root rot and other detrimental tree impacts.

Monitoring Phase:	Construction
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety; City of Los Angeles Bureau of Street Services – Urban Forestry Divisions
Monitoring Frequency:	During grading phase(s) of construction as determined by qualified arborist
Action Indicating Compliance:	Field inspection sign-off

PDF-BIO-9 Moving Construction Materials. Contractors and subcontractors shall ensure that care be exercised when moving construction equipment or supplies near the undisturbed oak tree and protected parkway trees, especially overhead. Contractors and subcontractors shall ensure that damage to the trees shall be avoided when transporting or moving construction materials and working around the tree (even outside of the fenced protected zone). Contractors and subcontractors shall flag aboveground tree parts with potential for damage (e.g., low limbs, scaffold branches, and trunks) with high-visibility flagging, such as florescent red or orange. If contact with the tree crown is unavoidable, conflicting branches may be pruned by an ISA-certified tree worker under supervision of a qualified arborist or their representative and shall adhere to ISA standards.

Monitoring Phase:	Construction
Enforcement Agency:	City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety; City of Los Angeles Bureau of Street Services – Urban Forestry Divisions

Monitoring Frequency: During construction as determined by qualified arborist

Action Indicating Compliance: Field inspection sign-off

PDF-BIO-10 Trenching. Except where specifically approved in writing beforehand by a qualified arborist, all trenching shall be outside of the fenced and root protected zones. Roots primarily extend in a horizontal direction, forming a support base to the tree similar to the base of a wineglass. Where trenching is necessary in areas that contain roots from retained trees, contractors shall use trenching techniques that include the use of either a root pruner (Dosko root pruner or equivalent) or an Air-Spade to limit root impacts. A qualified arborist or their representative shall ensure that all pruning cuts be clean and sharp to minimize ripping, tearing, and fracturing of the root system. Root damage caused by backhoes, earthmovers, dozers, or graders is severe and may result in tree mortality. Use of both root-pruning and Air-Spade equipment shall be accompanied only by hand tools to remove soil from trench locations. The trench shall be made no deeper than necessary.

Monitoring Phase: Pre-construction and Construction

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety; City of Los Angeles Bureau of Street Services – Urban Forestry Divisions

Monitoring Frequency: During trenching phase(s) of construction as determined by qualified arborist

Action Indicating Compliance: Approval of construction plan; field inspection sign-off

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

Monitoring Phase:	Construction and Operation
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety; City of Los Angeles Bureau of Street Services – Urban Forestry Divisions
Monitoring Frequency:	As determined by qualified arborist
Action Indicating Compliance:	Field inspection sign-off

PDF-BIO-12 Canopy Pruning. The contractor or subcontractor shall not prune protected trees until all construction is completed unless standard pruning would reduce conflict between canopy and equipment. All pruning shall be conducted by an ISA-certified tree worker under supervision of a qualified arborist and shall adhere to ISA pruning standards.

Monitoring Phase:	Construction
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Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety; City of Los Angeles Bureau of Street Services – Urban Forestry Divisions
Monitoring Frequency:	As determined by qualified arborist
Action Indicating Compliance:	Field inspection sign-off

PDF-BIO-13 Inspection. An ISA-certified arborist/licensed pest control advisor (PCA) or their representative shall inspect the preserved protected trees adjacent to grading and construction activity on a monthly basis for the duration of the proposed project. A report summarizing site conditions, observations, tree health, and recommendations for minimizing tree damage shall be submitted by the ISA-certified arborist/licensed PCA or their representative following each inspection.

Monitoring Phase:	Construction
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety; City of Los Angeles Bureau of Street Services – Urban Forestry Divisions
Monitoring Frequency:	Monthly inspection by qualified arborist
Action Indicating Compliance:	Monthly inspection reports for the duration of the construction

PDF-BIO-14 Mulch. After construction, the contractors and subcontractors shall ensure that the natural duff layer under all trees is maintained. The contractors and subcontractors shall ensure that the mulch is kept clear of the trunk base to avoid creating conditions favorable to the establishment and growth of decay-causing fungal pathogens. Should it be necessary to add organic mulch under retained protected trees, packaged or commercial mulch shall not be

used because it may contain oak root fungus. Also, the use of redwood chips shall be avoided because certain inhibitive chemicals may be present in the wood. Other wood chips and crushed walnut shells can be used, but the best mulch that provides a source of nutrients for the tree is its own leaf litter. Any organic mulch added by the contractor or subcontractor shall be applied to a maximum depth of 4 inches where possible.

Monitoring Phase:	Post-construction
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety; City of Los Angeles Bureau of Street Services – Urban Forestry Divisions
Monitoring Frequency:	Upon completion of construction
Action Indicating Compliance:	Field inspection sign-off

PDF-BIO-15 Pruning. After construction, regular pruning of the protected trees is not required. An ISA-certified tree worker, under the supervision of a qualified arborist, shall only prune trees to maintain clearance and remove broken, dead, or diseased branches. No more than 15 percent of the canopy shall be removed at one time. All pruning shall conform to ISA standards.

Monitoring Phase:	Operation
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety; City of Los Angeles Bureau of Street Services – Urban Forestry Divisions
Monitoring Frequency:	As determined by qualified arborist

Action Indicating Compliance: Inclusion as a Condition of Approval on the Project; field inspection sign-off

PDF-BIO-16 Watering. After construction, the protected trees should not require regular irrigation other than the 12 months following substantial root pruning, if applicable. However, soil probing shall be necessary to accurately monitor moisture levels. Supplemental irrigation for the trees that sustained root pruning and any newly planted trees may be necessary, especially in years with low winter rainfall.

Monitoring Phase: Operation

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety; City of Los Angeles Bureau of Street Services – Urban Forestry Divisions

Monitoring Frequency: As determined by qualified arborist

Action Indicating Compliance: Inclusion as a Condition of Approval on the Project; field inspection sign-off

PDF-BIO-17 Watering Adjacent Plant Material. After construction, all plants near the protected trees shall require moderate to low levels of water. The contractor or subcontractor shall infrequently water surrounding plants with deep soaks, rather than frequent light irrigation, and allow them to dry out between watering. The soil shall not be allowed to become saturated or stay continually wet, and drainage should not allow ponding of water beneath the canopy of the oak trees. Irrigation spray shall not hit the trunk of any tree. The contractor or subcontractor shall maintain a 30-inch dry zone around all tree trunks. An aboveground micro-spray irrigation system shall be used in lieu of typical underground pop-up sprays.

Monitoring Phase: Operation

Enforcement Agency: City of Los Angeles

Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety; City of Los Angeles Bureau of Street Services – Urban Forestry Divisions
Monitoring Frequency:	As determined by qualified arborist
Action Indicating Compliance:	Inclusion as a Condition of Approval on the Project; field inspection sign-off

PDF-BIO-18 Chemical Applications. After construction, if the protected trees are maintained in a healthy state, regular spraying for insect or disease control would not be necessary. If a problem does develop, a representative qualified arborist shall be consulted since the trees may require application of insecticides to prevent the intrusion of bark-boring beetles and other invasive pests. All chemical spraying shall be performed by a licensed applicator under the direction of a licensed PCA.

Monitoring Phase:	Operation
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety; City of Los Angeles Bureau of Street Services – Urban Forestry Divisions
Monitoring Frequency:	As determined by qualified arborist
Action Indicating Compliance:	Inclusion as a Condition of Approval on the Project; field inspection sign-off

PDF-BIO-19 A qualified arborist shall inspect the protected trees retained on site for a period of five years following the completion of construction activity. Monitoring visits shall be completed quarterly, totaling 20 visits. Following each monitoring visit, a report summarizing site conditions, observations, tree health, and recommendations for promoting tree health shall be submitted. Additionally, any tree mortality shall be noted, and any tree dying

during the monitoring period shall be replaced with the same species as specified for minimum replacement standards in Appendix C of this EIR.

Monitoring Phase:	Post-construction
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety; City of Los Angeles Bureau of Street Services – Urban Forestry Divisions
Monitoring Frequency:	Quarterly monitoring visits for 5 years
Action Indicating Compliance:	Monitoring reports to be submitted following each visit

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

D. Cultural Resources

(1) Project Design Features

No project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

MM-CUL-1 Inadvertent Discovery or Archaeological Resources. In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under the California Environmental Quality Act (CEQA; 14 California Code of Regulations 15064.5(f); California Public Resources Code Section 21083.2), the archaeologist may simply record the find and allow work to continue. However, if the discovery proves significant

under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

Monitoring Phase:	Construction
Enforcement Agency:	City of Los Angeles Department of City Planning, Office of Historic resources
Monitoring Agency:	City of Los Angeles Department of City Planning, Office of Historic Resources
Monitoring Frequency:	To be determined by archaeologist if resource(s) are discovered
Action Indicating Compliance:	Field inspection sign-off

MM-CUL-2 Inadvertent Discovery of Human Remains. In accordance with California Health and Safety Code Section 7050.5, if potential human remains are found, the lead agency staff and the County Coroner must be immediately notified of the discovery. The coroner would provide a determination within 48 hours of notification. No further excavation or disturbance of the identified material, or any area reasonably suspected to overlie additional remains, can occur until a determination has been made. If the County Coroner determines that the remains are, or are believed to be, Native American, the coroner would notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendent (MLD) from the deceased Native American. Within 48 hours of this notification, the MLD would recommend to the lead agency her/his preferred treatment of the remains and associated grave goods.

Monitoring Phase:	Construction
Enforcement Agency:	City of Los Angeles Department of City Planning, Office of Historic Resources
Monitoring Agency:	City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Frequency: During ground-disturbing activities

Action Indicating Compliance: Field inspection sign-off

E. Geology and Soils

(1) Project Design Features

No project design features are identified in the EIR for this environmental issue.

(2) Mitigation Measures

MM-GEO-1 Paleontological Monitoring and Resource Treatment. Prior to commencement of any grading activity on site, the Project Applicant shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards, subject to the review and approval of the City of Los Angeles Department of City Planning. The Qualified Paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the Project that is consistent with the SVP guidelines and attend the pre-construction meeting. The Qualified Paleontologist or an SVP qualified Paleontological Resource Monitor shall be on site during all rough grading and other significant ground-disturbing activities in depths greater than 5 feet below ground surface. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the Qualified Paleontologist shall temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery shall be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor shall remove the rope and allow grading to recommence in the area of the find.

Monitoring Phase: Pre-construction

Enforcement Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Frequency: To be determined by archaeologist if resource(s) are discovered during significant ground-disturbing

activities in depths greater than 5 feet

Action Indicating Compliance: Field inspection sign-off

F. Greenhouse Gas Emissions

(1) Project Design Features

PDF-GHG-1: The Project will achieve Leadership in Environmental and Energy Design (LEED) Gold or other equivalent green building standards. Key green building and LEED measures are provided below:

- On-site photovoltaic (PV) system will result in renewable energy production that will offset building energy costs between 1 percent and 5 percent.
- Kaiser Permanente will contract for 100 percent of off-site generated power to be green power through the Los Angeles Department of Water and Power's Green Power Program, renewable energy certificates, or carbon offsets.
- Exterior lighting will be automatically controlled via occupancy sensors, photo sensors, and/or timers to illuminate only when required. For indoor lighting, individual lighting control for at least 90 percent of individual occupant spaces with at least 3 lighting levels will be met. Multi-zone control for all shared multi-occupant spaces, separate control of presentation wall lighting, switches or manual controls will be located in the same space with the controlled luminaires.
- Light-emitting diode (LED) lighting shall be used throughout the Project.
- Enhanced refrigerant management will be included in Project operations, including ensuring that no chlorofluorocarbon-based refrigerants will be used and that refrigerants for heating, ventilation, air conditioning and refrigeration will be selected that minimize or eliminate the emission of compounds that contribute to ozone (O₃) depletion and global climate change.

Monitoring Phase: Design and operation

Enforcement Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Building plan review
Action Indicating Compliance:	Inclusion as a Condition of Approval of the Project; plan check approval and prior to the issuance of the applicable building permit

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

G. Hazards and Hazardous Materials

(1) Project Design Features

Implement project design feature **PDF-TRF-1**. **PDF-TRF-1** is discussed in Section K, Transportation, of this MMP.

(2) Mitigation Measures

MM-HAZ-1 Polychlorinated Biphenyl (PCB) Waste Characterization, Segregation, Disposal and Reuse Plan. Prior to building demolition, PCB-containing materials must be characterized, segregated, and disposed of in accordance with federal law. The Applicant will engage a licensed contractor to complete the on-site cleanup and disposal of PCBs in accordance with 40 Code of Federal Regulations (CFR) 761.61(a). This requires preparation of a PCB Waste Characterization, Segregation, Disposal, and Reuse Plan (Plan), notifications to the U.S. Environmental Protection Agency (EPA), characterization of PCB-containing materials, remediation or removal of said materials, and proper disposal of said materials. The PCB Waste Characterization, Segregation, Disposal, and Reuse Plan shall include air monitoring (in accordance with South Coast Air Quality Management District Rule 1403) and soil testing and may also include pilot studies to verify that the proposed remediation strategies are effective. These components would be developed by the licensed contractor, in cooperation with the Applicant. Notifications will be completed

as required in 40 CFR 761.61(a)(3); the EPA Regional Administrator has 30 days to review and comment on the Plan; if EPA does not comment, it is deemed approved.

Monitoring Phase:	Pre-demolition
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Prior to building demolition
Action Indicating Compliance:	EPA Regional Administrator to approve plan

MM-HAZ-2 Hazardous Substance Management, Handling, Storage, Disposal, and Emergency Response Plan. In order to reduce the risk of accidental release of hazardous materials during construction activities at the site, which release is not foreseeable or anticipated, the Applicant shall prepare and implement during all construction activities a hazardous substance management, handling, storage, disposal, and emergency response plan. A hazardous materials spill kit shall be maintained on-site for small spills. Additionally, the Applicant shall monitor all contractors for compliance with applicable regulations, including regulations regarding hazardous materials and hazardous wastes, including disposal. Hazardous materials shall not be disposed of or released on the ground, in the underlying groundwater, or any surface water. Totally enclosed containment will be provided for all trash. All construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials, will be removed to a waste facility permitted to treat, store, or dispose of such materials.

Monitoring Phase:	Construction
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Daily inspection
Action Indicating Compliance:	Field inspection sign-off

MM-HAZ-3 Soil Management Plan. The Applicant shall prepare a soil management plan (SMP) for Site 1 prior to excavation and redevelopment activities. The purpose of the SMP is to provide guidance to project management, site management, and field personnel on the identification and management of impacted and clean soil, the segregation and management of impacted soil in accordance with regulatory requirements, the transportation of impacted soil to an off-site disposal facility licensed to accept such soil, and the identification and management of construction debris during excavation, grading, and construction activities to be completed at Site 1. The SMP shall include procedures for identification, handling, reporting, and removal of possible USTs, piping, dispensers or other UST components that may be encountered during construction. The SMP shall include health and safety measures, which may include but are not limited to personal protective equipment and periodic work breathing zone monitoring and monitoring for volatile organic compounds using a handheld organic vapor analyzer in the event impacted soils are encountered during excavation activities.

Monitoring Phase:	Pre-construction at Site 1
Enforcement Agency:	City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
Monitoring Agency:	City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Prior to excavation and redevelopment activities at Site 1
Action Indicating Compliance:	Approval of SMP and issuance of grading permit at Site 1

MM-HAZ-4 Vapor Barrier. Soil vapor sampling will be conducted to determine the nature and extent of soil vapor contamination. The analytical results shall be compared to applicable regulatory screening levels. Should soil vapor concentrations exceed applicable screening levels, a vapor mitigation system will be designed for new facilities that include occupied space within the area of contamination. The vapor mitigation system may include passive or active techniques to remove the risk of vapor intrusion into occupied structures. Such conditions could include soil impacted with volatile organic compounds (VOCs) being left in place beneath the depth of ground disturbance for new construction, the presence of shallow groundwater

containing VOC beneath the property, or soil vapor migration from adjacent or nearby sites impacted with VOC. The incorporation of a vapor mitigation system must be reflected in the new building plans.

Monitoring Phase:	Construction
Enforcement Agency:	City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
Monitoring Agency:	City of Los Angeles Department of Building and Safety
Monitoring Frequency:	During grading phase(s) of construction
Action Indicating Compliance:	Approval/review of soil data collection; approval of building plans and issuance of applicable building permit

H. Hydrology and Water Quality

(1) Project Design Features

PDF-HYD-1 High-efficiency toilets with a flush volume of 1.0 gallon of water per flush or less.

Monitoring Phase:	Design and operation
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Building plan review
Action Indicating Compliance:	Inclusion as a Condition of Approval of the Project; plan check approval and prior to the issuance of the applicable building permit

PDF-HYD-2 No-flush urinals, with 1.0 gallon of water used for automatic rinsing every 72 hours.

Monitoring Phase:	Design and operation
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Building plan review
Action Indicating Compliance:	Inclusion as a Condition of Approval of the Project; plan check approval and prior to the issuance of the applicable building permit

PDF-HYD-3 Showerheads with a flow rate of 1.0 gallon per minute or less.

Monitoring Phase:	Design and operation
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Building plan review
Action Indicating Compliance:	Inclusion as a Condition of Approval of the Project; plan check approval and prior to the issuance of the applicable building permit

PDF-HYD-4 Domestic water heating systems located proximate to the point(s) of use, or a central plant service, based on which system is determined to be most efficient.

Monitoring Phase:	Design and operation
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of Building and Safety

Monitoring Frequency:	Building plan review
Action Indicating Compliance:	Inclusion as a Condition of Approval of the Project; plan check approval and prior to the issuance of the applicable building permit

PDF-HYD-5 Tankless and on-demand water heaters, where appropriate.

Monitoring Phase:	Design and operation
Enforcement Agency:	City of Los Angeles
Monitoring Agency:	City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Building plan review
Action Indicating Compliance:	Inclusion as a Condition of Approval of the Project; plan check approval and prior to the issuance of the applicable building permit

PDF-HYD-6 Drip/subsurface irrigation and micro sprays (micro sprays apply water only where it is needed, to reduce water waste).

Monitoring Phase:	Design and operation
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Building plan review
Action Indicating Compliance:	Inclusion as a Condition of Approval of the Project; landscape plan check approval

PDF-HYD-7 Use of proper hydro-zoning and zoned irrigation (a method that groups plants with similar water requirements in the same areas of a site to minimize irrigation).

Monitoring Phase:	Design and operation
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Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Building plan review
Action Indicating Compliance:	Inclusion as a Condition of Approval of the Project; landscape plan check approval

PDF-HYD-8 Water-efficient landscaping (40 percent of plants would be drought tolerant).

Monitoring Phase:	Design and operation
Enforcement Agency:	City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Building plan review
Action Indicating Compliance:	Inclusion as a Condition of Approval of the Project; landscape plan check approval

(2) Mitigation Measures

Implement mitigation measure **MM-HAZ-1**. **MM-HAZ-1** is discussed in Section G, Hazards and Hazardous Materials, of this MMP.

I. Noise

(1) Project Design Features

PDF-NOI-1 The following Project characteristics pertaining to construction noise will be implemented and adhered to:

- All construction equipment, fixed or mobile, will be equipped with properly operating and maintained mufflers and silencers, consistent with manufacturing standards.
- Construction noise reduction methods, such as shutting off idling equipment, maximizing the distance between construction equipment

staging areas and occupied sensitive receptor areas, and use of electric air compressors and similar power tools, rather than diesel equipment, will be used.

- Noise attenuation measures, which may include temporary noise barriers or noise blankets around stationary construction noise sources, will be implemented.
- During construction, stationary construction equipment will be placed such that emitted noise is directed away from or shielded from sensitive receptors.
- During construction, stockpiling and vehicle staging areas will be located away from noise sensitive receptors, while being located on the building sites or on existing developed areas.
- Where power poles are available, electricity from power poles and/or solar powered generators rather than temporary diesel or gasoline powered generators will be used during construction.
- If diesel- or gasoline- powered generators are used, such equipment will be located at least 100 feet away from off-site sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible, and flexible sound control curtains will be placed around the equipment when in use.
- Construction hours, allowable workdays, and the phone number of the job superintendent will be clearly posted at all construction entrances to allow surrounding property owners and residents to contact the job superintendent if necessary. In the event the City receives a complaint, appropriate corrective actions will be implemented and a report of the action provided to the reporting party.

Monitoring Phase:	Construction
Enforcement Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Frequency: Daily inspections during construction

Action Indicating Compliance: Field inspection sign-off

PDF-NOI-2 The following Project characteristics pertaining to vibration during construction will be implemented and adhered to:

- When vibration intensive activities, such as excavation, drilling, shoring, etc., occur within 100 feet of vibration-sensitive structures, the contractor will install and maintain at least one continuously operational automated vibrational monitor on or immediately adjacent to the sensitive structure. The monitors must be capable of being programmed with predetermined vibratory velocity levels and transmitting an alarm to on-site personnel with authorization to halt work in the vicinity so that strategies to reduce vibratory impacts can be implemented. It is recommended that a level of 90 percent of the structure damage threshold (0.12 inches/second [in/sec] peak particle velocity [PPV]) be utilized (0.108 in/sec PPV). Strategies to reduce vibratory impacts will include, but not limited to, halting/staggering concurrent activities, creating a larger set back distance, or utilizing lower-vibratory (typically smaller) equipment or techniques.

Monitoring Phase: Construction

Enforcement Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Frequency: Daily inspections during construction

Action Indicating Compliance: Field inspection sign-off

(2) Mitigation Measures

MM-NOI-1 Prior to commencement of construction activities, temporary noise barriers shall be constructed at the Project Site boundaries adjacent to residential land uses and other noise-sensitive land uses. The temporary sound barrier (minimum STC 25) shall be designed to provide a minimum 15-A-weighted decibels noise reduction at the adjacent residences.

Monitoring Phase:	Pre-construction
Enforcement Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Pre-construction
Action Indicating Compliance:	Field inspection sign-off

J. Public Services

Fire Protection

(1) Project Design Features

Implement project design feature **PDF-TRF-1**. **PDF-TRF-1** is discussed in Section K, Transportation, of this MMP.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

Police Protection

(1) Project Design Features

PDF-POL-1 During construction, Kaiser Permanente shall implement appropriate temporary security measures, including security fencing (e.g., chain-link fencing), low-level security lighting, and locked entry (e.g., padlocked gates or guard-restricted access) to limit access by the general public. Regular security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) shall also be provided. During construction activities, the Project Contractor shall document the security measures, and the documentation shall be made available to the Construction Monitor.

Monitoring Phase:	Construction
Enforcement Agency:	City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety;

	City of Los Angeles Police Department
Monitoring Agency:	City of Los Angeles Department of City Planning
Monitoring Frequency:	Daily inspection during construction
Action Indicating Compliance:	Field inspection sign-off

Implement project design feature **PDF-TRF-1**. **PDF-TRF-1** is discussed in Section K, Transportation, of this MMP.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

K. Transportation

(1) Project Design Features

PDF-TFR-1 The following measures shall be implemented as part of the Construction Staging and Traffic Management Plan (CSTMP), to be prepared by Kaiser Permanente:

1. Provide advanced notification to adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction. Provide a posted sign on the Project Site with hotline information for adjacent property owners to call and address specific issues or activities that may potentially cause problems at on- and off-site locations.
2. Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses.
3. Coordinate with public transit agencies to provide advanced notifications of any temporary stop relocations and durations and follow all safety required procedures required by the concerned agency, including returning temporarily modified transit facilities to pre-Project construction conditions..

4. Limit any potential roadway lane closure/s to off-peak travel periods, to the extent feasible.
5. Provide traffic control for any potential roadway lane closure, detour, or other disruption to traffic circulation.
6. To the extent feasible, store any construction equipment within the perimeter fence of the construction site. Should temporary storage of a large piece of equipment be necessary outside of the perimeter fence (e.g., within a designated lane closure area), that area must comply with City-approved detour/traffic control plans.
7. Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers, including compliance with Americans with Disabilities Act requirements;
8. Identify and require the routes that construction vehicles would use for the delivery of construction materials (e.g., lumber, tiles, piping, windows), to access the project site, traffic controls and detours, and proposed construction phasing plan for the Project.
9. Require Kaiser Permanente to keep all haul routes adjacent to the Project Site clean and free of debris including, but not limited to, gravel and dirt as a result of its operations.
10. Schedule delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods, to the extent possible. No hauling or transport shall be allowed during nighttime hours, Sundays, or federal holidays unless required by the California Department of City of Los Angeles Department of Transportation (Caltrans) or Los Angeles Department of Transportation (LADOT);
11. Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities, if needed.
12. Haul trucks entering or exiting public streets shall at all times yield to public traffic.
13. Construction-related parking and staging of vehicles shall occur on-site to the extent possible, but may occur on nearby public parking lots, as approved by the City.

14. Coordinate deliveries to reduce the potential of trucks waiting to unload for protracted periods of times.
15. Prohibit parking by construction workers on adjacent streets and direct construction workers to available/designated parking areas within and adjacent to the Project Site.
16. The CSTMP shall meet standards established in the current California Manual on Uniform Traffic Control Device as well as City of Los Angeles requirements.

Monitoring Phase:	Pre-construction and Construction
Enforcement Agency:	City of Los Angeles Department of Transportation; City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of Transportation; City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Field inspection(s) during construction
Action Indicating Compliance:	Field inspection sign-off

PDF-TRF-2 The following Transportation Demand Management (TDM) strategies would be implemented to comply with the City's existing Transportation Demand Management and Trip Reduction Measures Ordinance (Ordinance No. 168700):

- Education & Encouragement: Promotions and Marketing (TDM Strategy C)
 - Include voluntary travel behavior change program, such as distributing information through the media, the internet, newsletters, public notices, and the travel feedback program.
 - Include promotion and marketing strategies to influence public attitudes about issues related to transportation and promote a range of travel demand management techniques available to the proposed Project; this could be implemented via an on-site Transportation Information Center. Organizing transit, walk or bike to work events, administrative support for the formation of carpools/vanpools, guaranteed ride home

programs for employees, and allowing for flexible and alternative work schedules could be included as these strategies.

- Bicycle Infrastructure (TDM Strategy F):
 - Include Bike Parking Per Los Angeles Municipal Code
 - Include Secure Bike Parking and Showers
- Neighborhood Enhancement: Pedestrian Network Improvements (TDM Strategy G):
 - Include pedestrian network improvements, which may include traffic calming improvements, such as marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, roundabouts or mini-circle, on-street parking, planter strips with street trees, chicanes/chokers, etc.
 - Include applicable pedestrian network improvements that link all uses and connects to all existing or planned external streets and pedestrian facilities contiguous with the Project Site.

Monitoring Phase: Construction and operations

Enforcement Agency: City of Los Angeles Department of City Planning

Monitoring Agency: Department of City of Los Angeles; Department of City Planning

Monitoring Frequency: Plan check

Action Indicating Compliance: Inclusion as a Condition of Approval of the Project

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

L. Utilities and Service Systems

Water Supply and Infrastructure

(1) Project Design Features

PDF-WTR-1 The Project will include installation of new service laterals and meters for fire water, domestic water, and irrigation uses, as needed to connect to the existing water mainlines adjacent to the proposed building sites, as determined by the Los Angeles Department of Water and Power and Los Angeles Department of Public Works. Project-related infrastructure will be designed and installed to meet all applicable City requirements.

Monitoring Phase:	Design
Enforcement Agency:	City of Los Angeles Department of Water and Power; City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Plan check
Action Indicating Compliance:	Plan check approval and issuance of applicable building permit

Implement project design features **PDF-HYD-1** through **PDF-HYD-8**. **PDF-HYD-1** through **PDF-HYD-8** are discussed in Section H, Hydrology and Water Quality, of this MMP.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

Wastewater

(1) Project Design Features

Implement project design features **PDF-HYD-1** through **PDF-HYD-5**. **PDF-HYD-1** through **PDF-HYD-5** are discussed in Section H, Hydrology and Water Quality, of this MMP.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

Solid Waste

(1) Project Design Features

PDF-SW-1 Hospital operations would be completed in accordance with the City of Los Angeles Hospital Best Management Practices manual (LASAN 2014), which focuses on ways to reduce, reuse, and recycle during operations. This manual reflects Best Management Practices (BMPs) being implemented throughout the healthcare system, most of which are actual practices and others are feasible programs that may be logistically difficult to implement on a facility-wide basis, such as having a mixed recycling collection system in every department. BMPs would be enforced by the City of Los Angeles as part of the Zero Waste LA Franchise System.

Monitoring Phase:	Operations
Enforcement Agency:	City of Los Angeles Sanitation and Environment; City of Los Angeles Department of Building and Safety
Monitoring Agency:	City of Los Angeles Sanitation and Environment; City of Los Angeles Department of Building and Safety
Monitoring Frequency:	Inspection during operation of the Project as determined by the City of Los Angeles Sanitation and Environment
Action Indicating Compliance:	Inclusion as a Condition of Approval of the Project

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

M. Energy

(1) Project Design Features

Implement project design features **PDF-AIR-4**, **PDF-TRF-2**, **PDF-HYD-1** through **PDF-HYD-10**, and **PDF-SW-1** and **PDF-SW-2**. Project design features **PDF-AIR-4**, **PDF-TRF-2**, **PDF-HYD-1** through **PDF-HYD-10**, and **PDF-SW-1** and **PDF-SW-2** are discussed in

Sections B, Air Quality, H, Hydrology and Water Quality; K, Transportation; and L, Utilities and Service Systems – Solid Waste, respectively.

(2) Mitigation Measures

No mitigation measures are identified in the EIR for this environmental issue.

APPENDIX FEIR-1

Public Review Comment Letters

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 266-3562
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

August 31, 2021

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

RE: Kaiser Permanente Los Angeles Medical
Center – Draft Environmental Impact Report
(DEIR)
SCH # 2017091061
GTS # 07-LA-2017-03667
Vic. LA-101/PM: 4.964

Dear Erin Strelch:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The project proposes to expand the existing Kaiser Permanente Los Angeles Medical Center (Medical Center) campus by replacing facilities and adding new buildings. It would be developed in three consecutive phases and involve six sites. Phase 1 of the Project would include demolition of existing commercial and residential structures and surface parking lots on Sites 1 and 2, and two medical office buildings (MOBs) on Sites 3 and 4. Phase 1 would also include construction of a parking structure and MOB on Site 1 and a procedure center addition to the existing MOB on Site 2. Phase 2 of the Project would include the demolition of an existing parking structure and MOB space on Site 5 and construction of a new, larger parking structure with ground floor commercial retail space. Phase 2 would also include construction on Site 4 of either an MOB (Option A) or a hospital addition (Option B). Phase 3 of the Project would include construction of a new MOB on Site 3 and a parking structure on the south side of the existing parking structure on Site 6. If Option A is selected for Phase 2, the MOB constructed at Site 3 would be smaller (41,500 square feet). If Option B is selected for Phase 2, the MOB at Site 3 would be larger (73,500 square feet). The proposed buildings for all three phases would total 401,100 square feet under Option A or 433,100 square feet under Option B, with an additional 533,400 square feet of parking structure area. The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

A-1

The project is located approximately 5,000 feet away from US-101 and Sunset Boulevard ramps. From reviewing the DEIR, Caltrans has the following comments.

We support implementing the Transportation Demand Measures (TDMs) this project has proposed, including bicycle parking, walkability enhancements, and the other TDMs included under Project Design Feature "PDF-TRF-2". Caltrans encourages Lead Agencies to implement TDM strategies that reduce Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions because this aligns with Caltrans' mission to provide a safe and reliable transportation network that serves all people and respects the environment. In addition to the proposed TDMs, please consider providing less vehicle parking through perhaps offering unbundled parking or parking cash-out programs. This is because research has shown that an abundance of vehicle parking can induce increased driving and VMT.

A-2

*"Provide a safe and reliable transportation network that serves all people
and respects the environment."*

For additional information on limiting VMT on the State Highway System, see Caltrans' updated *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (TISG), dated May 2020 and released on Caltrans' website in July 2020: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>. Note that since the passage of Senate Bill 743, Caltrans bases its project reviews off its new TISG, as opposed to the 2015 "Freeway Impact Analysis Procedures" agreement executed between LADOT and Caltrans District 7 that is referenced in Appendix L.

A-3

The following information is included for your consideration. If construction traffic is expected to cause issues on any State facilities, please submit the Construction Staging and Traffic Management Plan detailing these issues for Caltrans' review. We support and appreciate the following measures in this plan:

- Schedule delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods, to the extent possible.
- Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities, if needed.

A-4

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2017-03667.

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

September 13, 2021

Erin Strellich
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
Sent by Email: erin.strellich@lacity.org

RE: Kaiser Permanente Los Angeles Medical Center Project – Case No. ENV-2015-4476
Notice of Availability of Draft Environmental Impact Report (DEIR)

Dear Erin Strellich:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Kaiser Permanente Los Angeles Medical Center Project (Project) located at 1345 North Vermont Avenue (Ave.), 4760 Sunset Boulevard (Blvd.), 1505 North (N.) Edgemont Street (St.), 1526 N Edgemont St., 1517 N. Vermont Ave., 4950 West (W.) Sunset Blvd. in the City of Los Angeles (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro’s area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. In particular, this letter outlines topics regarding the Project’s potential impacts on the Metro B Line (Red) and Metro bus facilities and services which should be analyzed in the EIR, and provides recommendations for mitigation measures as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.¹

B-1

In addition to the specific comments outlined below, Metro is providing the City and Kaiser Permanente (Applicant) with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at <https://www.metro.net/devreview>.

Project Description

The Project includes expanding the existing Kaiser Permanente Los Angeles Medical Center (Medical Center) campus by replacing facilities and adding new buildings. The Project would be developed in three consecutive phases.

B-2

¹ See CEQA Guidelines section 15064.3(a); Governor’s Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

Recommendations for EIR Scope and Content

Bus Service Adjacency

1. Service: Metro Bus Line 2 operates on Sunset Blvd, and Lines 204, 206, and 754 operate on Vermont Avenue, adjacent to the proposed Project. Several Metro Bus stops are directly adjacent to the Project. Other transit operators such as LADOT may provide service in the vicinity of the Project and should be consulted.
2. Impact Analysis: The EIR should analyze potential effects on Metro Bus service and identify mitigation measures as appropriate. Potential impacts may include impacts to transportation services, stops, and temporary or permanent bus service rerouting. Specific types of impacts and recommended mitigation measures to address them include, without limitation, the following:
 - a. Bus Stop Condition: The EIR should identify all bus stops on all streets adjacent to the Project site. During construction, the Applicant may either maintain the stop in its current condition and location, or temporarily relocate the stops consistent with the needs of Metro Bus operations. Temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be Americans with Disabilities Act (ADA)-compliant and allow passengers with disabilities a clear path of travel between the bus stop and the Project. Once the Project is completed, the Applicant must ensure any existing Metro bus stops affected by the Project is returned to its pre-Project location and condition, unless otherwise directed by Metro.
 - b. Driveways: Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.
 - c. Bus Stop Enhancements: Metro encourages the installation of enhancements and other amenities that improve safety and comfort for transit riders. These include benches, bus shelters, wayfinding signage, enhanced crosswalks and ADA-compliant ramps, pedestrian lighting, and shade trees in paths of travel to bus stops. The City should consider requesting the installation of such amenities as part of the Project.
 - d. Bus Operations Coordination: The Applicant shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 not later than 30 days before the start of Project construction. Other municipal bus services may also be impacted and shall be included in construction outreach efforts.

B-3

Subway Adjacency

1. Operations: The Metro B Line (Red) currently operates peak service as often as every ten minutes in both directions. Trains may operate 24 hours a day, seven days a week in the tunnels below [or adjacent to] the Project.
2. Impact Analysis: Due to the Project's proximity to the Metro B Line (Red) and the Vermont/Sunset Station (Station), the EIR must analyze potential effects on subway operations and identify mitigation measures as appropriate. Critical impacts that should be studied include (without limitation): impacts of Project construction and operation on the structural and systems integrity of subway tunnels; damage to subway infrastructure, including tracks; disruption to subway service; temporary and/or permanent changes to customer access and circulation to the station.

B-4

The following provisions should be used to develop a mitigation measure that addresses these potential impacts:

- a. Technical Review: The Applicant shall submit architectural plans, engineering drawings and calculations, and construction work plans and methods, including any crane placement and radius, to evaluate any impacts to the Metro B Line (Red) infrastructure in relationship to the Project. Before issuance of any building permit for the Project, the Applicant shall obtain Metro's approval of final construction plans.
- b. Construction Safety: The construction and operation of the Project shall not disrupt the operation and maintenance activities of the Metro B Line (Red) or the structural and systems integrity of Metro's tunnels. Not later than one month before Project construction, the Applicant shall contact Metro to schedule a pre-construction meeting with all Project construction personnel and Metro Real Estate, Construction Management, and Construction Safety staff. During Project construction, the Applicant shall:
 - i. Work in close coordination with Metro to ensure that station access, visibility, and structural integrity are not compromised by construction activities or permanent build conditions;
 - ii. Notify Metro of any changes to demolition and construction activities that may impact the use of the ROW;
 - iii. Permit Metro staff to monitor demolition and/or construction activities to ascertain any impact to the Metro B Line (Red) and Station.
3. Advisories to Applicant: The Applicant is encouraged to contact the Metro Development Review Team early in the design process to address potential impacts. The Applicant should also be advised of the following:
 - a. Occupational Safety and Health Administration (OSHA) Requirements: Demolition, construction and/or excavation work in proximity to Metro right-of-way (ROW) with potential to damage subway tracks and related infrastructure may be subject to additional OSHA safety requirements.
 - b. Technical Review: Metro charges for staff time spent on engineering review and construction monitoring.
 - c. Right of Way (ROW) Entry Permit: For temporary or ongoing access to Metro ROW for demolition, construction, and/or maintenance activities, the Applicant shall complete Metro's Track Allocation process with Metro Rail Operations and obtain a Right of Entry Permit from Metro Real Estate. Approval for single tracking or a power shutdown, while possible, is highly discouraged; if sought, the Applicant shall apply for and obtain such approval not later than two months before the start of Project construction. The Applicant shall apply for and obtain approval for any special operations, including the use of a pile driver or any other equipment that could come in close proximity or encroach on the tunnels or related structures, not later than one month before the start of Project construction.
 - d. Cost of Impacts: The Applicant will be responsible for costs incurred by Metro resulting from Project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure, including single-tracking or bus bridging around closures. The Applicant will also bear all costs for any noise mitigation required for the Project.

B-4
Cont.

Transit Supportive Planning: Recommendations and Resources

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

- 1. Transit Supportive Planning Toolkit: Metro strongly recommends that the Applicant review the Transit Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and, applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at <https://www.metro.net/about/funding-resources>. B-5
- 2. Land Use: Metro supports development of commercial and offices near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City and Applicant to be mindful of the Project’s proximity to Vermont/Sunset Station, including orienting pedestrian pathways towards the station. B-6
- 3. Transit Connections and Access: Metro strongly encourages the Applicant to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. The City should consider requiring the installation of such features as part of the conditions of approval for the Project, including:
 - a. Transfer Activity: Given the Project’s proximity to the Metro bus stops and Vermont/Sunset Station the Project design should consider and accommodate transfer activity between bus and rail lines that will occur along the sidewalks and public spaces. Metro has completed the Metro Transfers Design Guide, a best practices document on transit improvements. This can be accessed online at <https://www.metro.net/about/station-design-projects/>. B-7
 - b. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged. The Applicant should also coordinate with the Metro Bike Share program for a potential Bike Share station at this development.
 - c. First & Last Mile Access: The Project should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf. B-7
- 4. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand. B-8
- 5. Wayfinding: Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus or Rail pictograms) requires review and approval by Metro Signage and Environmental Graphic Design. B-9
- 6. Transit Pass Programs: Metro would like to inform the Applicant of Metro’s employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and B-10

Kaiser Permanente Los Angeles Medical Center Project
Notice of Preparation of EIR – Metro Comments
September 13, 2021

Small Employer Pass (SEP) Program. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. The A-TAP can also be used for residential projects. For more information on these programs, please visit the programs' website at <https://www.metro.net/riding/eapp/>.

↑
B-10
Cont.

If you have any questions regarding this letter, please contact me by phone at 213-922-2671, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,



Shine Ling, AICP
Manager, Transit Oriented Communities

cc: Ron Carnahan, Kaiser Permanente, ron.e.carnahan@kp.org

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/devreview>

CITY OF LOS ANGELES

CALIFORNIA

CULTURAL AFFAIRS COMMISSION

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DANIELLE BRAZELL
GENERAL MANAGER

September 13, 2021

Erin Strelch
City of Los Angeles Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: Kaiser Permanente Los Angeles Medical Center Project
Case Number: ENV-2015-4476-EIR

Dear Ms. Strelch:

The City of Los Angeles Department of Cultural Affairs (DCA) is writing to respond to the Draft EIR (DEIR) released for the Kaiser Permanente Los Angeles Medical Center Project (Case Number: *ENV-2015-4476-EIR*). As the immediate neighbor to the proposed improvements, DCA looks forward to working with Kaiser to ensure that Barnsdall Park and its arts centers, galleries, and historic sites are not impacted by this development.

C-1

To further understand the impact of this development, the Department of Cultural Affairs would like greater clarity on the design of these structures and to review the following renderings:

C-2

- Plans and elevations for 1526 North Edgemont Street (Option A & Option B) overlaid on those for the existing structure that the new building will replace.
- On page III-29 of the DEIR, two options are cited for the design of 1526 North Edgemont Street. Option B includes mention of "two pedestrian bridges." DCA would like to see renderings that clearly show the overall design for both as well as proposed setbacks on upper floors and detail on these pedestrian bridges.

C-3

- Viewshed studies of 1526 North Edgemont Street taken from Hollyhock House's west lawn and from windows in the living room, study, breakfast room, and bedrooms.

C-4

- Viewshed studies of the replacement parking structures from the Barnsdall Junior Art Center and from windows in the living room, study, breakfast room, and bedrooms of the Hollyhock House.

C-5

Hollyhock House is one of Barnsdall Park’s historic sites that borders the proposed development. Hollyhock House is owned and operated by the City of Los Angeles Department of Cultural Affairs (DCA). Hollyhock House is a National Historic landmark and a Los Angeles Historic-Cultural Monument. In July 2019, Hollyhock House was one of eight sites inscribed to the UNESCO World Heritage List as part of “The 20th-Century Architecture of Frank Lloyd Wright.”

C-6

The UNESCO World Heritage inscription establishes boundaries for both the property and its buffer zone. The property boundaries closely align to that of the Barnsdall Park hilltop, while the buffer zone encompasses the 36-acre property Aline Barnsdall originally purchased in 1919 (bound by Hollywood Boulevard to the north, Vermont Avenue to the east, Sunset Boulevard to the south, and Edgemont Street to the west. Protection of the viewshed from Hollyhock House is of critical importance in maintaining the site’s outstanding universal value and authenticity.

C-7

Kaiser Permanente’s DEIR includes two replacement structures in the Phase-2 work schedule located within Hollyhock House’s buffer zone. The medical building at 1526 North Edgemont Street and parking structure at 1517 North Vermont Boulevard are both planned to be 105 feet tall, inclusive of rooftop structures.

The medical building will not exceed the height of the existing building it is replacing; however, the Department has not had an opportunity to see proposed plans for this building to understand if the side of the building will change the viewshed from Hollyhock House. The replacement parking structure will be taller than the one it is replacing; however, it will be approximately the same height as the parking structure next to it. While this new parking structure will be largely shielded from Hollyhock House’s view by the Barnsdall Junior Art Center in the park’s southeast corner, it will change the view from the Barnsdall Junior Art Center.

C-8

The Department of Cultural Affairs is grateful to the Kaiser Permanente team for their continued communication with our staff throughout the Sunset Campus development process. We look forward to working together to ensure that the outstanding universal value and authenticity of Los Angeles’s first-and-only UNESCO World Heritage site are protected for the benefit of all, including the local communities we serve.

C-9

Sincerely,

Danielle Brazell

Danielle Brazell
General Manager

cc: City of Los Angeles, Office of Historic Resources
City of Los Angeles, Council District 13

Certificate Of Completion

Envelope Id: B1AC78CE9B954941BE0A355E5DED3BF1	Status: Completed
Subject: DB DEIR Response Letter Final 9-13-21.doc	
Source Envelope:	
Document Pages: 2	Signatures: 1
Certificate Pages: 1	Initials: 0
AutoNav: Enabled	Envelope Originator:
Envelope Stamping: Disabled	Danielle Brazell
Time Zone: (UTC-08:00) Pacific Time (US & Canada)	Danielle.Brazell@lacity.org
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Signature	Timestamp
Danielle Brazell	Sent: 9/13/2021 3:16:50 PM
Danielle.Brazell@lacity.org	Viewed: 9/13/2021 3:17:01 PM
General Manager, City of Los Angeles Department of Cultural Affairs	Signed: 9/13/2021 3:17:27 PM
City of Los Angeles, Department of Culutral Affairs	Freeform Signing
Security Level: Email, Account Authentication (None)	
Signature Adoption: Pre-selected Style	
Using IP Address: 75.46.137.120	
Electronic Record and Signature Disclosure:	
Not Offered via DocuSign	

In Person Signer Events

Signature

Timestamp

Editor Delivery Events

Status

Timestamp

Agent Delivery Events

Status

Timestamp

Intermediary Delivery Events

Status

Timestamp

Certified Delivery Events

Status

Timestamp

Carbon Copy Events

Status

Timestamp

Witness Events

Signature

Timestamp

Notary Events

Signature

Timestamp

Envelope Summary Events

Status

Timestamps

Envelope Sent	Hashed/Encrypted	9/13/2021 3:16:51 PM
Certified Delivered	Security Checked	9/13/2021 3:17:01 PM
Signing Complete	Security Checked	9/13/2021 3:17:27 PM
Completed	Security Checked	9/13/2021 3:17:27 PM

Payment Events

Status

Timestamps



South Coast Air Quality Management District

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

SENT VIA E-MAIL:

September 10, 2021

Erin.Strellich@lacity.org

Erin Strellich, City Planning Associate
City of Los Angeles, Planning Department
221 North Figueroa Street, Suite 1350
Los Angeles, California 90012

Draft Environmental Impact Report (EIR) for the Proposed Kaiser Permanente Los Angeles Center Project (Proposed Project) (SCH No.: 2017091061)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA) for the Proposed Project. The following comments include recommended revisions to the CEQA air quality analysis for regional construction impacts from cleanup activities and information on South Coast AQMD rules and permits that the Lead Agency should incorporate into the Final EIR.

D-1

South Coast AQMD Staff's Summary of Project Descriptions in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of demolition of 234,200 square feet of existing structures, and construction of 1,088,900 square feet of medical uses on 15.34 acres. Environmental Site Assessments and Subsurface Assessment Report have been prepared, indicating potential soil contamination with polychlorinated biphenyls and volatile organic compounds. As such, Mitigation Measures HAZ-1 through HAZ-4 require development of plans such as Disposal and Reuse Plan and Soil Management Plan to remove and clean up soil during construction¹.

South Coast AQMD Staff's Comments

Based on a review of the Draft EIR and supporting technical appendices, South Coast AQMD staff has two comments.

CEQA Air Quality Analysis for Regional Construction Impacts from Cleanup Activities

Based on the Hazards and Hazardous Materials Section in the Draft EIR, soil cleanup activities are reasonably foreseeable and would be conducted during construction of the Proposed Project. The Lead Agency did not quantify emissions from cleanup activities in the Draft EIR. Cleanup activities will likely involve the use of heavy-duty, diesel-fueled trucks for soil export and result in emissions from vehicle trips by workers that will be required to conduct cleanup activities. Additionally, cleanup activities will likely require the use of additional equipment that may be different from typical equipment for grading and site preparation for construction. Since cleanup activities are reasonably foreseeable for the Proposed Project at the time the EIR is prepared, the Lead Agency should use good faith, best efforts to provide information on the scope, types, and

D-2

¹ Draft EIR. Executive Summary. Pages I-43-49.

duration of cleanup activities, quantify emissions from cleanup activities, and include those emissions in the Proposed Project’s construction emissions profile to be compared to South Coast AQMD’s air quality CEQA significance thresholds for construction to determine the level of significance in the Final EIR. Alternatively, if emissions from cleanup activities are not included in the Final EIR, the Lead Agency should provide reasons for not including them supported by substantial evidence in the record or consider including a new mitigation measure to commit to evaluating potential environmental impacts from cleanup activities under CEQA prior to commencing any cleanup activities.

D-2
Cont.

South Coast AQMD Rules and Permits

Disturbing and excavated soils that may contain hydrocarbons or toxic air contaminants are subject to the requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil², and Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants³. The Lead Agency should discuss South Coast AQMD Rules 1166 and 1466 in the Air Quality Section of the Final EIR.

If it is reasonably foreseeable at the time of the EIR is prepared that cleanup activities would involve the use of equipment which either emits or controls air pollution, South Coast AQMD staff should be consulted in advance to determine whether or not any permits or plans are required to be filed and approved by South Coast AQMD prior to the operation of such equipment, and to identify if any other South Coast AQMD Rules, such as Rule 431.2 – Sulfur Content of Liquid Fuels⁴ and Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines⁵ will be applicable and should be discussed in the Final EIR.

D-3

Operation of portable engines and portable equipment units of 50 brake horsepower or greater (> 50bhp) that emit particulate matter requires a permit from South Coast AQMD or registration under the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)⁶. The Lead Agency should consult with South Coast AQMD’s Engineering and Permitting staff to determine if there is any diesel-powered equipment during implementation that will require a South Coast AQMD permit or if the equipment will need to be registered under the PERP through CARB. If a permit from South Coast AQMD is required, South Coast AQMD is a Responsible Agency for the Proposed Project and should be identified in the Final EIR. Any assumptions used in the Air Quality Analysis in the Final EIR will be used as the basis for permit conditions and limits for the Proposed Project. Should there be any questions on permits, please contact South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD’s

² South Coast AQMD. Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

³ South Coast AQMD. Rule 1466 – control of Particulate Emissions from Soils with Toxic Air Contaminants. Accessed at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

⁴ South Coast AQMD. Rule 431.2 – Sulfur Content of Liquid Fuels. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-431-2.pdf>.

⁵ South Coast AQMD. Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1110-2.pdf>.

⁶ South Coast AQMD. *Portable Equipment Registration Program (PERP)*. Accessed at: <http://www.aqmd.gov/home/permits/equipment-registration/perp>.

webpage at: <http://www.aqmd.gov/home/permits>. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB's webpage at: <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>.

D-3
Cont.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Lead Agency makes a finding that the recommended mitigation measures is not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting it in the Final EIR (CEQA Guidelines Section 15091).

D-4

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:ST

LAC210803-02

Control Number

Office of the President
Dr. Mary Gallagher

Los Angeles City College
855 North Vermont Avenue
Los Angeles, CA 90029
Tel (323) 953-4010
Fax (323) 953-4009



September 16, 2021

Ms. Erin Strelch
City of Los Angeles Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: Kaiser Permanente Los Angeles Medical Center Project
Case No: ENV-2015-4476-EIR

Dear Ms. Strelch:

I am writing on behalf of Los Angeles City College to express our full support for the Kaiser Permanente Los Angeles Medical Center (LAMC) expansion project.

Los Angeles City College empowers students from the diverse communities it serves to achieve their educational and career goals. We understand that students need additional resources outside of the classroom to help contribute to their success such as health & wellness, food, and housing assistance. Our organization is excited that Kaiser Permanente is proposing much-needed updates to its LAMC facilities.

Supporting the improvement of state-of-the-art healthcare facilities, like Kaiser Permanente LAMC, is crucial because it is essential to our public health. In addition, projects like this help stimulate economic growth and stability in the region. In light of the Covid-19 pandemic, it is clear how urgently this city needs to improve on both public health and economic stability. As an organization serving youth experiencing homelessness, we see the benefits that this facility will bring to the community both health-wise and economically.

After reviewing the DEIR, we continue to stand in strong support of this project. We hope that you consider our comments when evaluating this project and respectfully request the full approval of it. Thank you for your time and consideration.

Sincerely,

Dr. Mary Gallagher, LACC President



E-1



**Covenant
House
California**

find us here:

ANAHEIM LOS ANGELES OAKLAND SANTA CLARA

www.covenanthousecalifornia.org

September 15th, 2021

Ms. Erin Strelch
City of Los Angeles Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: Kaiser Permanente Los Angeles Medical Center Project
Case No: ENV-2015-4476-EIR

Dear Ms. Strelch:

I am writing on behalf of Covenant House California to express our support for the above-mentioned project. We are a non-profit that serves youth experiencing homelessness, by providing sanctuary through housing and support services to help them thrive. We are excited about Kaiser Permanente's proposal to expand and improve its Los Angeles Medical Center (LAMC) facilities.

Supporting the building, and improvement of state-of-the-art healthcare facilities, like Kaiser Permanente, is absolutely vital to, not only public health, but also economic stability. This project would generate a wide range of jobs across different industries, grow our healthcare workforce for future generations, bring innovation to our region's healthcare delivery system, and help stimulate economic growth to our local business and non-profit community.

As a non-profit organization working to address homelessness, we see the benefits that this project will bring to Hollywood. Kaiser Permanente has long been an active member in this community, supporting important community-based initiatives focused on homelessness, mental health, and substance abuse. In addition, staff and executive leadership have made themselves available for countless meetings and strategy sessions to problem-solve around public health and wellness efforts. We appreciate their continued devotion to increasing their ability to support the Hollywood community.

The findings in the DEIR have bolstered our support for this project. Improving the LAMC facilities is vital to Hollywood's public health and economic stability. We hope that you consider our support in evaluating this project and respectfully request the full approval of it. Thank you for your time and consideration.

Respectfully,

William A. Bedrossian, MSW
CEO, Covenant House California

F-1

The Margie &
Robert E. Petersen



Mel Culpepper
*Chief Executive
Officer*

Board of Directors

Anthony Morris
President
Robert Tietjen
Treasurer
Giles Steinberg
Secretary

Annie Agle
Tafiq Akhir
Rachel Alde
Maite Irakoze Baur
David Field
Lisa Gannon
Tarik A. Ghazy
Dionna Harris
Justin Macroni
Stanley Onuoha
Lisa Peagler
Charlin Polanco
Christopher Reyes
Brent Sandor
Jameson Shipley
Diana Spiro
Anne White

September 13, 2021

Ms. Erin Strelch
City of Los Angeles Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: Kaiser Permanente Los Angeles Medical Center Project
Case No: ENV-2015-4476-EIR

Dear Ms. Strelch:

I am writing on behalf of Boys & Girls Club of Hollywood to express our full support for the Kaiser Permanente Los Angeles Medical Center (LAMC) expansion project. We are a non-profit organization that has been providing academic enrichment programs to at-risk, low income and underprivileged students since 1937. Our mission is to "inspire and empower young people, especially those who need us most, to realize their full potential as productive, responsible, and caring adults." Our organization is excited that Kaiser Permanente is proposing much-needed updates to its LAMC facilities.

Supporting the improvement of state-of-the-art healthcare facilities, like Kaiser Permanente LAMC, is crucial because it is essential to our public health. In addition, projects like this help stimulate economic growth and stability in the region. In light of the Covid-19 pandemic, it is clear how urgently this city needs to improve on both public health and economic stability. As an organization serving youth experiencing homelessness, we see the benefits that this facility will bring to the community both health-wise and economically.

After reviewing the DEIR, we continue to stand in strong support of this project. We hope that you consider our comments when evaluating this project and respectfully request the full approval of it. Thank you for your time and consideration.

Sincerely,

Mel Culpepper, CEO
Boys & Girls Club of Hollywood

G-1



September 15, 2021

Ms. Erin Strellich, City of Los Angeles Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: Kaiser Permanente Los Angeles Medical Center Project
Case No: ENV-2015-4476-EIR

Dear Ms. Strellich:

I am writing on behalf of the people of Hollywood United Methodist Church to express our full support for the Kaiser Permanente Los Angeles Medical Center (LAMC) expansion. We are 100+ year stakeholders in the Hollywood community. We admire Kaiser Permanente's continued devotion to investing in their campus and increasing their ability to better serve the Hollywood community.

It is vital to support the building and improvement of state-of-the-art healthcare facilities, like Kaiser Permanente LAMC, not only because they are essential to public health, but also because they would create a wide range of jobs across different industries, grow our healthcare workforce for generations, and bring innovation to our region's healthcare delivery system. As seen time and again throughout the Covid-19 pandemic, bolstering public health and economic growth is absolutely crucial to the community's wellbeing.

As the senior pastor of a large urban church, I see the benefits that this project would bring to Hollywood. Kaiser Permanente has long been an active member in this community, supporting important community-based initiatives addressing the homelessness, mental health, and substance abuse crises. They were critical in addressing the HIV/AIDS epidemic decades ago, and continue to be leaders in health care in Los Angeles. We commend their efforts to increase their ability to better serve this community.

The findings in the DEIR have bolstered our support in this project. We hope that you consider our comments when evaluating this project and respectfully request its full approval. Thank you for your time and consideration.

Sincerely,

Rev. Kathy Cooper Ledesma
Senior Pastor

H-1



August 26, 2021

Ms. Erin Strellich
City of Los Angeles Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: Kaiser Permanente Los Angeles Medical Center Project
Case No: ENV-2015-4476-EIR

Dear Ms. Strellich:

I am writing on behalf of JWCH Institute to express our full support of the above-mentioned project. We are a private non-profit health agency dedicated to increasing access to high-quality health care for the under-served and at-risk population in the Los Angeles area. As a fellow health services provider in the Hollywood community, we are excited about Kaiser Permanente's proposal to expand and improve its Los Angeles Medical Center facilities.

It is vital to support the building and improvement of state-of-the-art healthcare facilities, like Kaiser Permanente LAMC, which is not only essential to public health, but would generate a wide range of jobs across different industries, grow our healthcare workforce for future generations, bring innovation to our region's healthcare delivery system, and are stable drivers of economic opportunity to our local business and nonprofit community.

As a local non-profit and partner, we see the benefits that this facility will bring to the City to position and prepare us for economic growth and long-term success. Kaiser continues to be a strong partner in the community, and we commend their commitment to increasing their ability to provide high-quality health services to the community.

The findings in the DEIR have bolstered our support for this project. Kaiser has been an invaluable asset throughout this public health and economic crisis that we currently face. We respectfully request the full approval of this important project.

Sincerely,

A handwritten signature in blue ink that reads "Al Ballesteros".

Al Ballesteros, MBA
President and CEO



Board of Directors

Co-Presidents
Cheryl Hayward
Community Member

David Jarrett
Entrepreneur

Secretary
Ivan Tether
Attorney, *Tether Law*

Treasurer
Scott Walker
Entrepreneur

Directors
Rod Barr
Writer

Kevin Beggs
Chairman
Lionsgate Television Group

Jeanie Berkley
Owner
Berkley Design

Ann Develin Blanchard
Agent
CAA

Lylle Breier
Senior VP, Global Marketing Partnerships
and Strategic Alliances, Promotions,
Synergy and Special Events
Walt Disney Studios

Sylvia Chivaranond
Consultant

Jay Faies
President & CEO
Band of Outsiders

Chuck Freadhoff
Writer

Angele Helton
Philanthropist

Mary Kincaid
Retired

Jax Levitt Hirsch
President
Levit Foundation

Danielle Levinson
Philanthropist

Tom Lloyd
Investment Analyst
International Research, Inc.

Rob Long
Writer/Producer

Toni Morgan
Executive Vice President
Tobacco

Victor Pagganganan
Vice President, Human Resources
Universal Studios Hollywood

Michael Oates Palmer
Writer

Samuel Rotter
Quantitative Analyst
Capital Group Companies

Michelle Waters-Butler, PsyD.
Chief Operating Officer
Polaris Teen Center

N. Dexter Williams
Senior Vice President
Capital Group Companies

Mimi Won Tschentin
Writer

My Friend's Place
5850 Hollywood Blvd
Los Angeles, CA 90028

September 22, 2021

Ms. Erin Strellich
City of Los Angeles Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

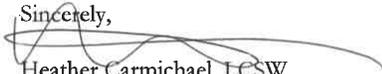
RE: Kaiser Permanente Los Angeles Medical Center Project
Case No: ENV-2015-4476-EIR

Dear Ms. Strellich:

I am writing on behalf of My Friend's Place to express our full support for the Kaiser Permanente Los Angeles Medical Center (LAMC) expansion project. We are a non-profit organization that has provided various services and outreach to youth experiencing homelessness in the Hollywood community for 33 years. Our organization is excited that Kaiser Permanente is proposing much-needed updates to its LAMC facilities.

Supporting the improvement of state-of-the-art healthcare facilities, like Kaiser Permanente LAMC, is crucial because it is essential to our public health. In addition, projects like this help stimulate economic growth and stability in the region. In light of the Covid-19 pandemic, it is clear how urgently this city needs to improve on both public health and economic stability. As an organization serving youth experiencing homelessness, we see the benefits that this facility will bring to the community both health-wise and economically.

After reviewing the DEIR, we continue to stand in strong support of this project. We hope that you consider our comments when evaluating this project and respectfully request the full approval of it. Thank you for your time and consideration.

Sincerely,

Heather Carmichael, LCSW
Executive Director

J-1



September 22, 2021

Ms. Erin Strellich
City of Los Angeles Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: Kaiser Permanente Los Angeles Medical Center Project
Case No: ENV-2015-4476-EIR

Dear Ms. Strellich:

I write on behalf of Hollywood 4WRD to express our full support for the Kaiser Permanente Los Angeles Medical Center (LAMC) expansion. We are a community-run coalition of Hollywood stakeholders organizing to end homelessness in our community through advocacy, education, service coordination, and innovation. We are excited that Kaiser Permanente could be expanding its LAMC campus and building much-needed upgrades to its facilities.

Supporting the improvement of state-of-the-art health care facilities, like Kaiser Permanente, is vital to Hollywood's public health. Additionally, projects like this would create a wide range of jobs across different industries and help stimulate Hollywood's economy for years to come. Our public health and economic stability are essential for Hollywood's continued growth towards becoming a more thriving community.

Kaiser Permanente has been an invaluable supporter of Hollywood 4WRD and our mission to affect systemic change addressing homelessness. The initial funding Kaiser Permanente provided when Hollywood 4WRD first started in 2008 was critical in building our organization. We appreciate their continued devotion to increasing their ability to support the Hollywood community.

After reviewing the DEIR, we continue to stand in strong support of this project. We hope that you consider our comments when evaluating this project and respectfully request the full approval of it. Thank you for your time and consideration.

Sincerely yours,

Brittney Weissman
Executive Director

K-1

APPENDIX FEIR-2

Figures Prepared for Responses to Comments

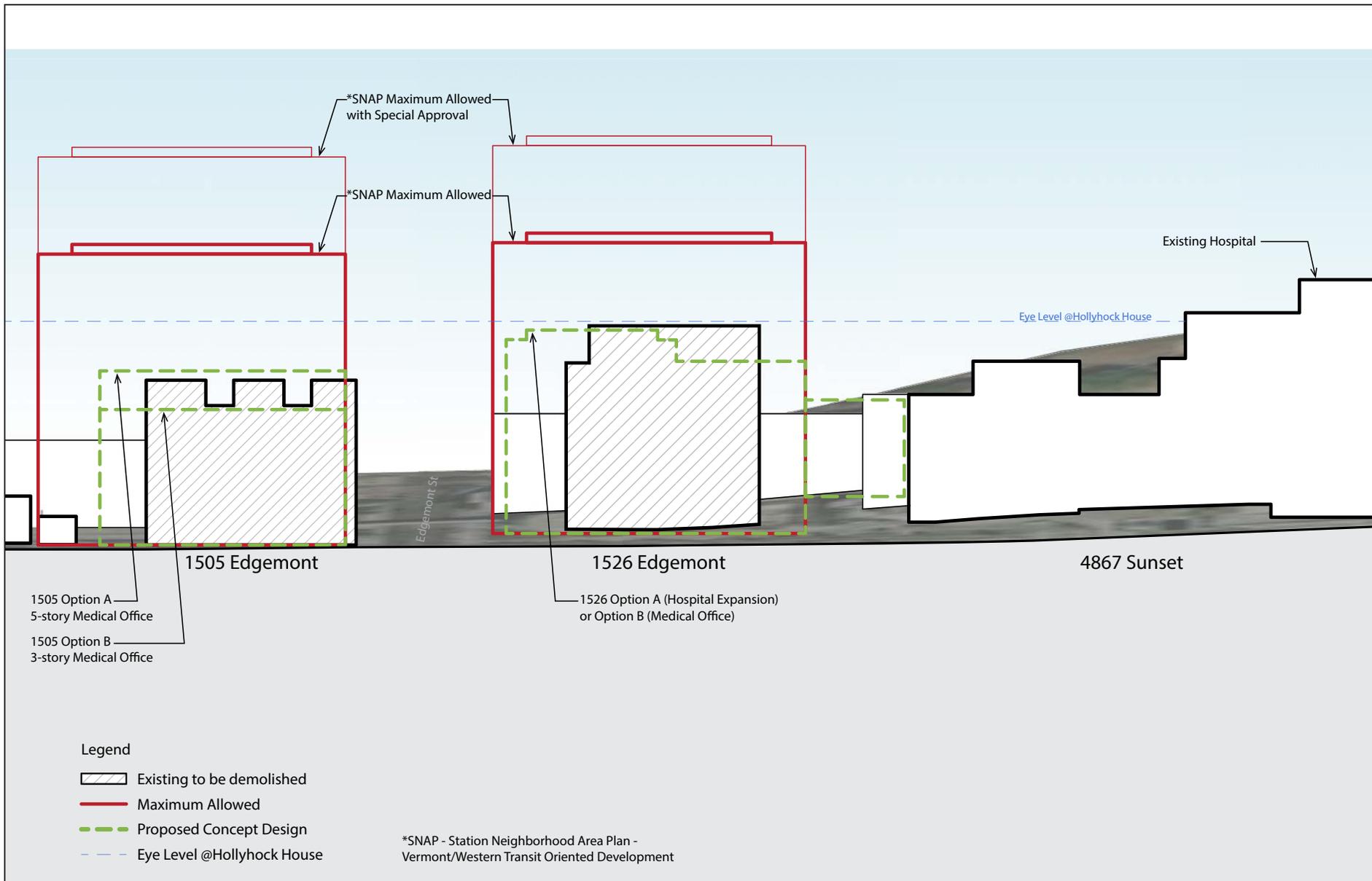
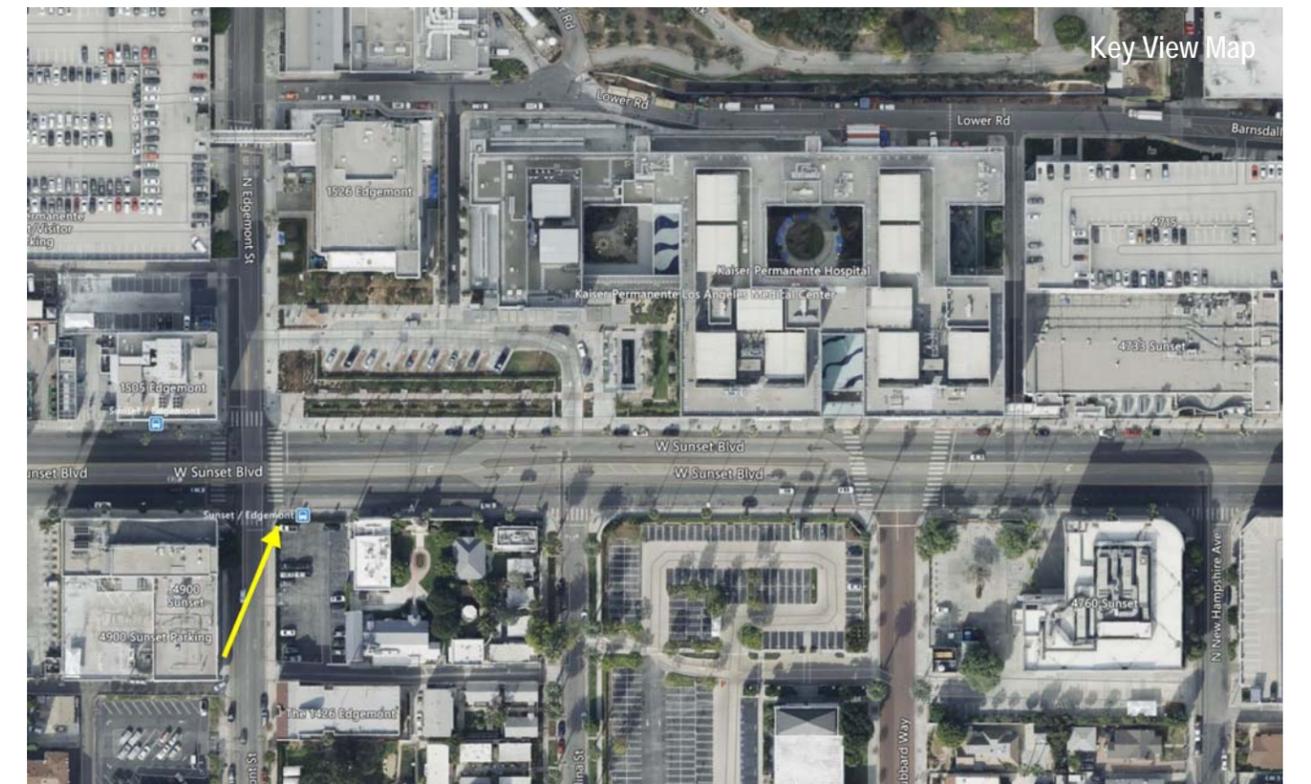
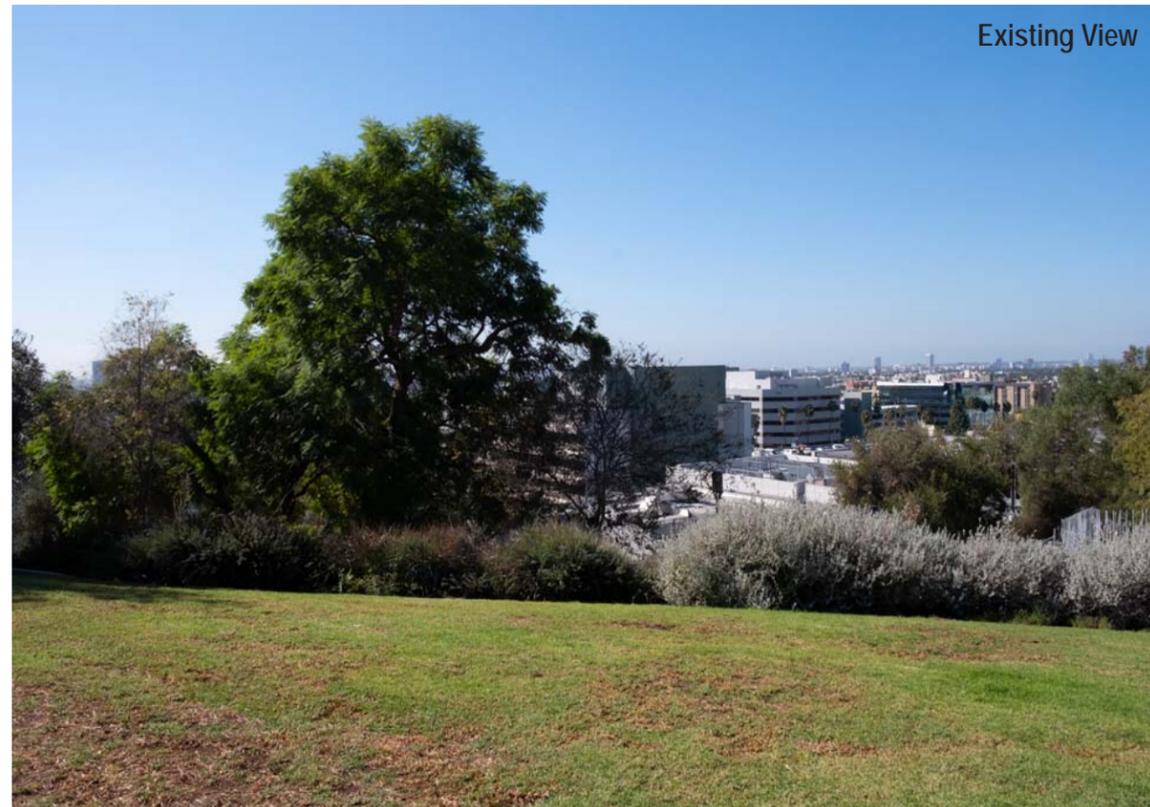


FIGURE II.C-A
Existing and Proposed - Elevations from Sunset Boulevard





Existing View



Proposed View



Existing View Without Tree



Proposed View Without Tree



- ① Hollyhock House's West Lawn
- ② Windows in the Living room
- ③ Windows in the Study
- ④ Windows in the Breakfast room
- ⑤ Windows in the Bedroom
- ⑥ Windows in the Bedroom
- ⑦ Barnsdall Junior Art Center

FIGURE II.C-C

Viewshed Study of 1526 North Edgemont - Taken from Hollyhock House's West Lawn

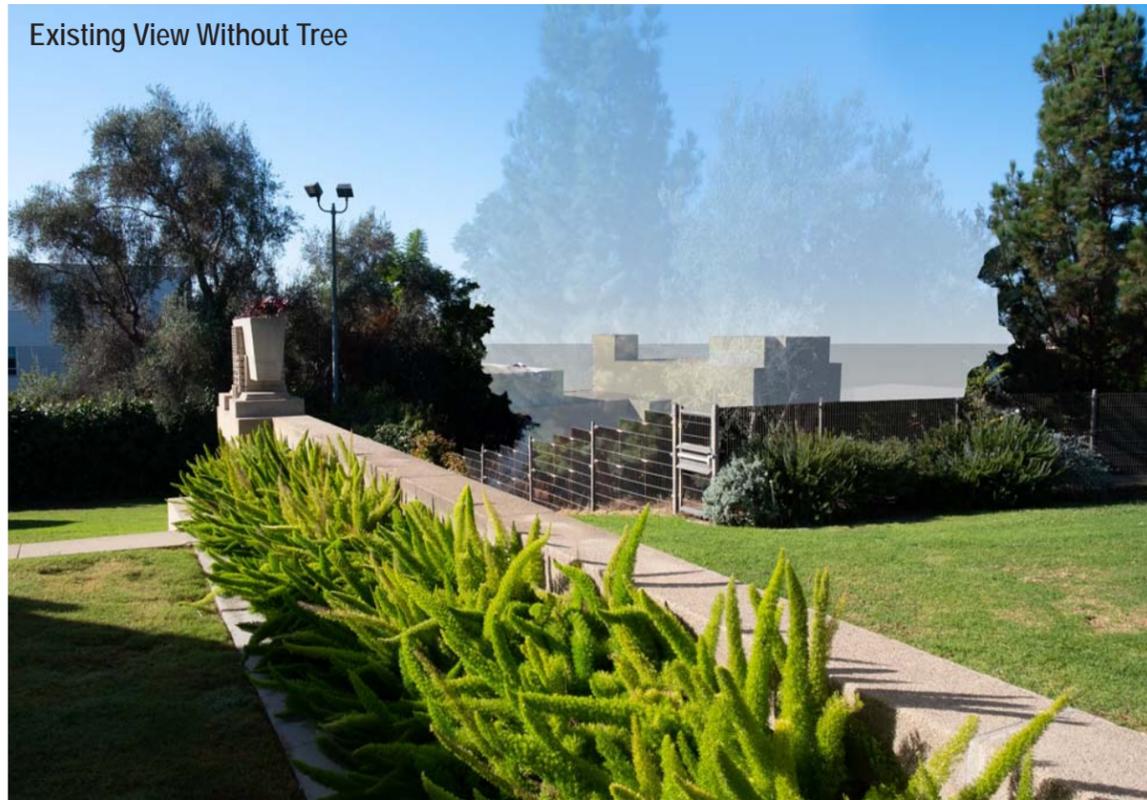
Existing View



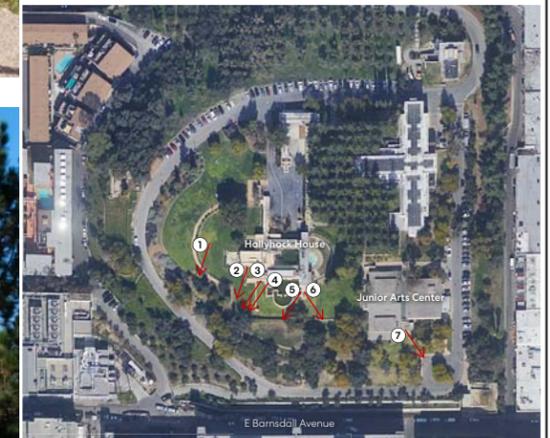
Proposed View



Existing View Without Tree



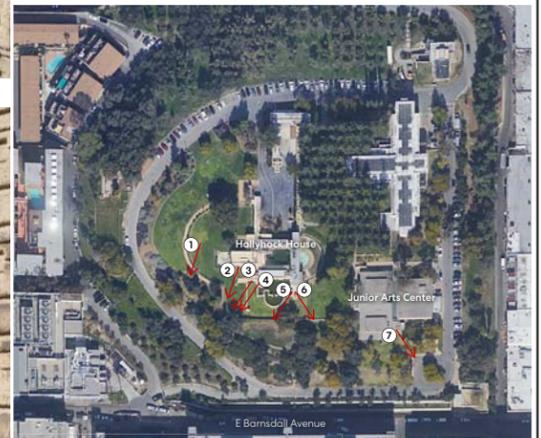
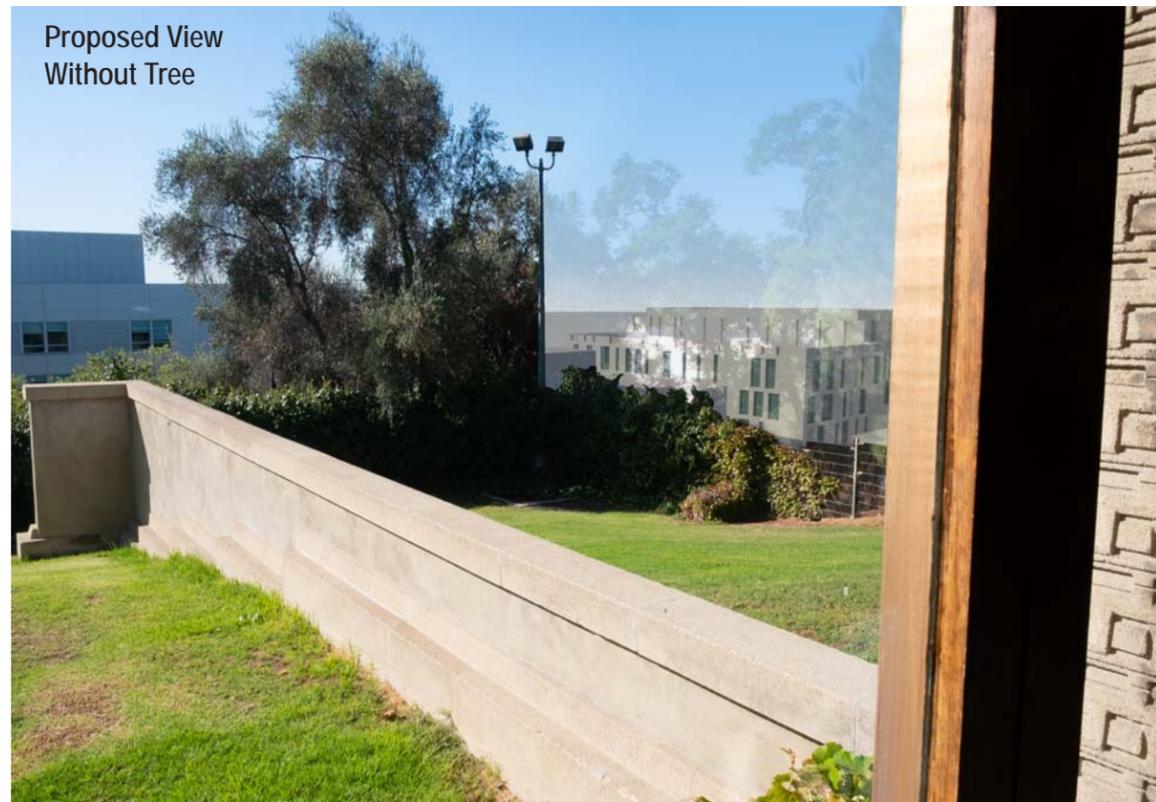
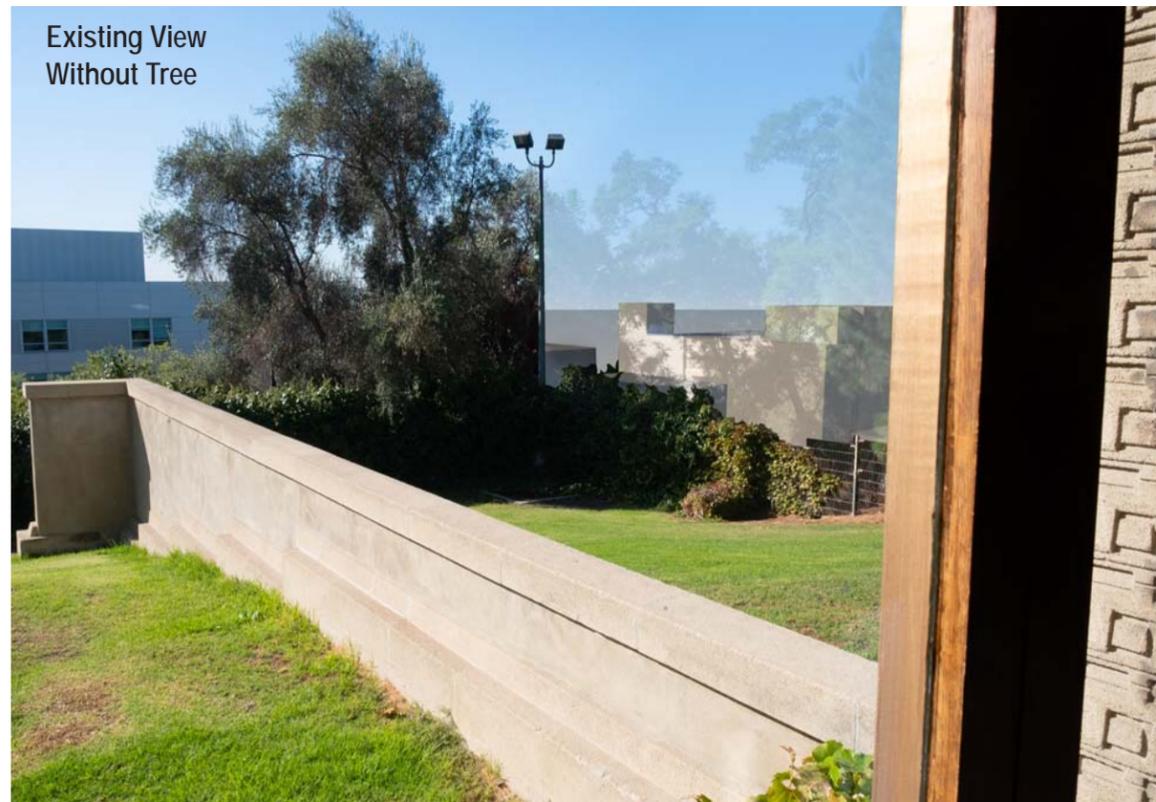
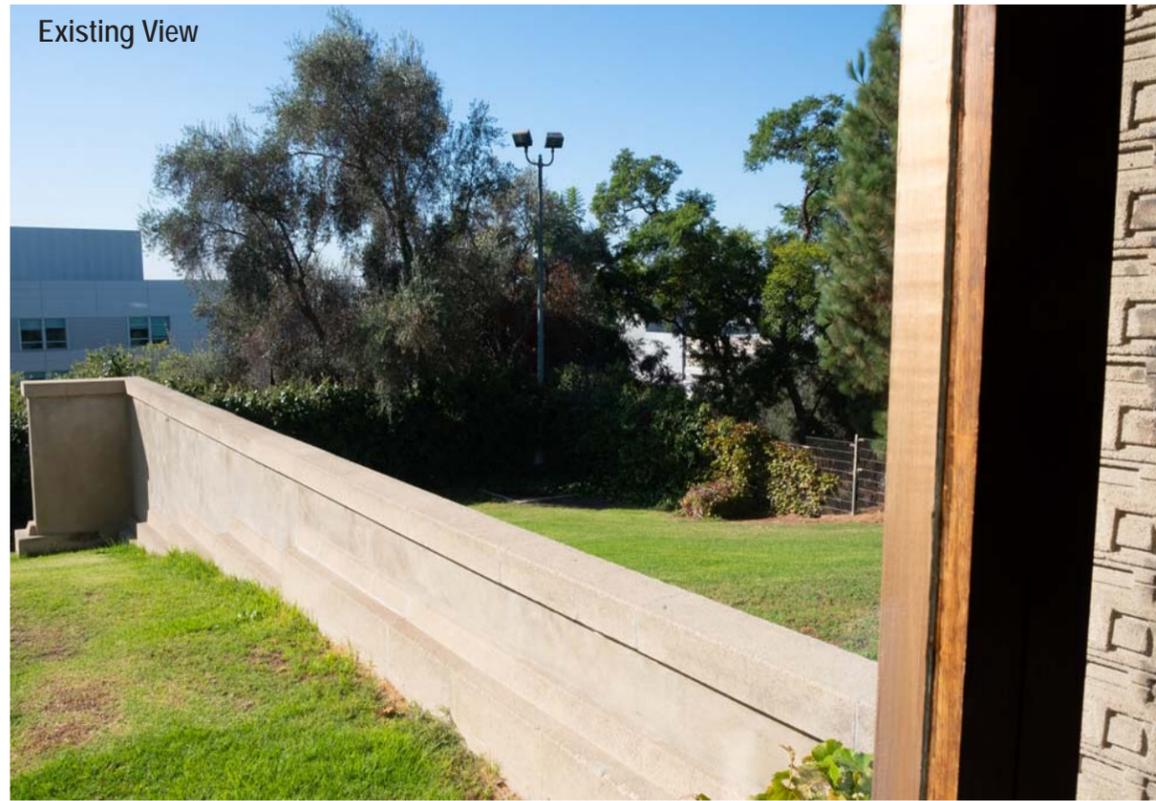
Proposed View Without Tree



- ① Hollyhock House's West Lawn
- ② Windows in the Living room
- ③ Windows in the Study
- ④ Windows in the Breakfast room
- ⑤ Windows in the Bedroom
- ⑥ Windows in the Bedroom
- ⑦ Barnsdall Junior Art Center

FIGURE II.C-D

Viewshed Study of 1526 North Edgemont - Taken from Hollyhock House's Window in the Living Room



- ① Hollyhock House's West Lawn
- ② Windows in the Living room
- ③ Windows in the Study
- ④ Windows in the Breakfast room
- ⑤ Windows in the Bedroom
- ⑥ Windows in the Bedroom
- ⑦ Barnsdall Junior Art Center

FIGURE II.C-E

Viewshed Study of 1526 North Edgemont - Taken from Hollyhock House's Window in the Study



Existing View



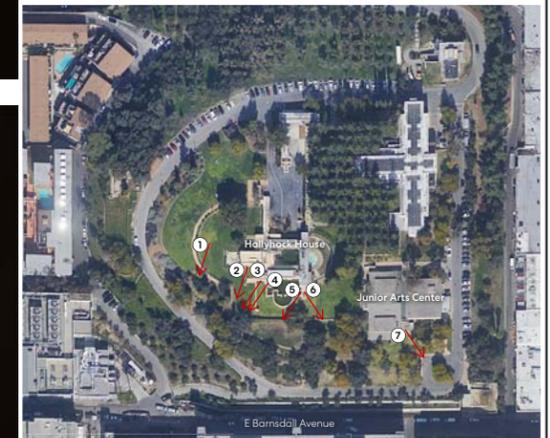
Proposed View



Existing View Without Tree



Proposed View Without Tree



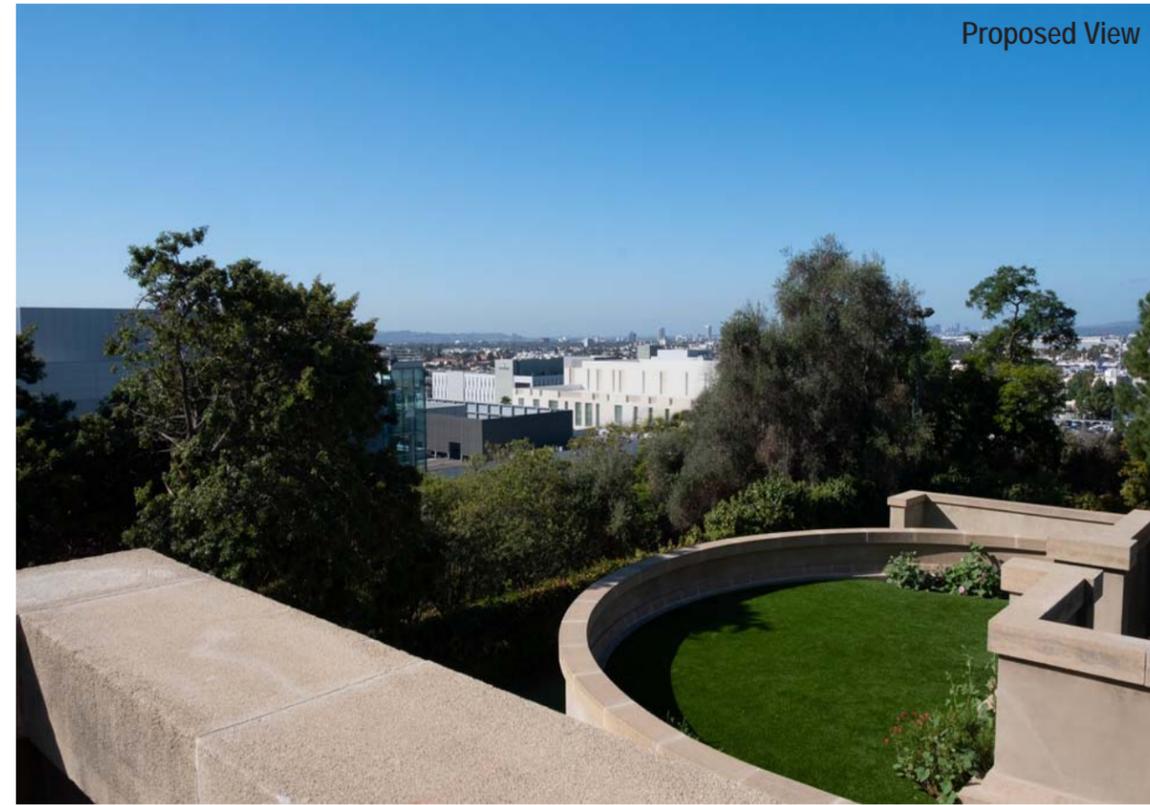
- ① Hollyhock House's West Lawn
- ② Windows in the Living room
- ③ Windows in the Study
- ④ Windows in the Breakfast room
- ⑤ Windows in the Bedroom
- ⑥ Windows in the Bedroom
- ⑦ Barnsdall Junior Art Center

FIGURE II.C-F

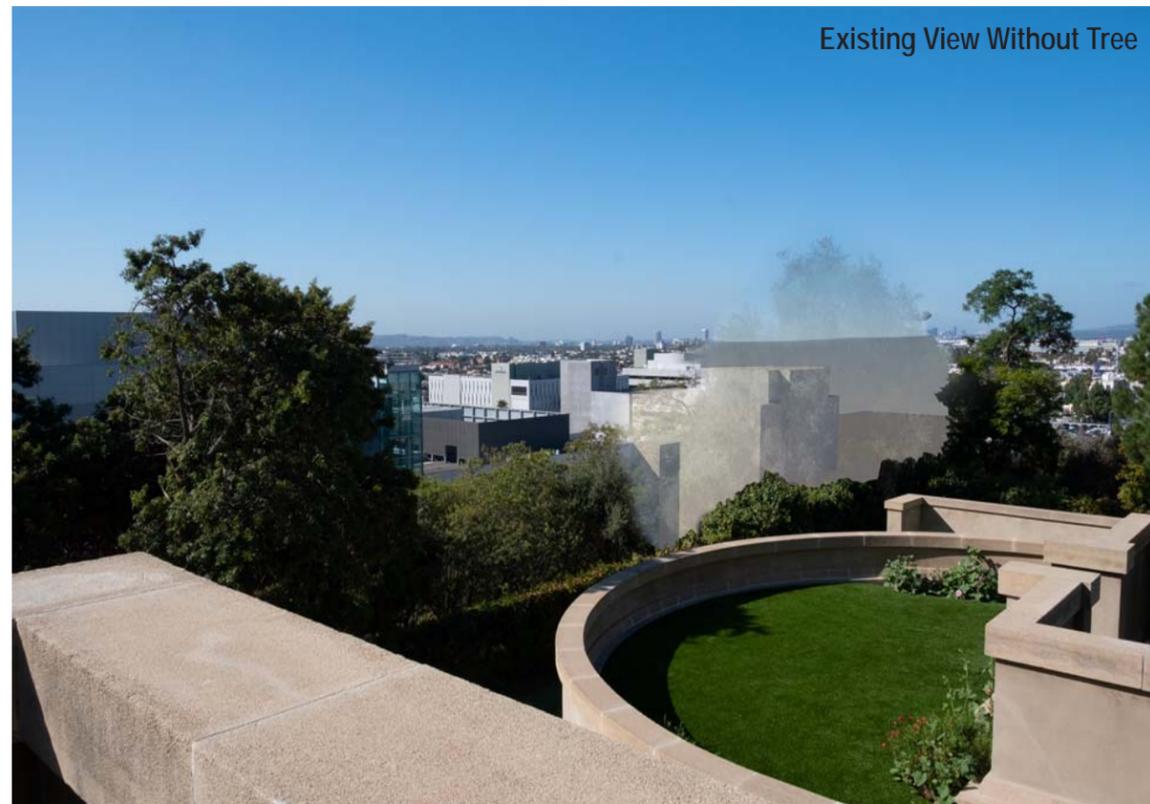
Viewshed Study of 1526 North Edgemont - Taken from Hollyhock House's Window in the Breakfast Room



Existing View



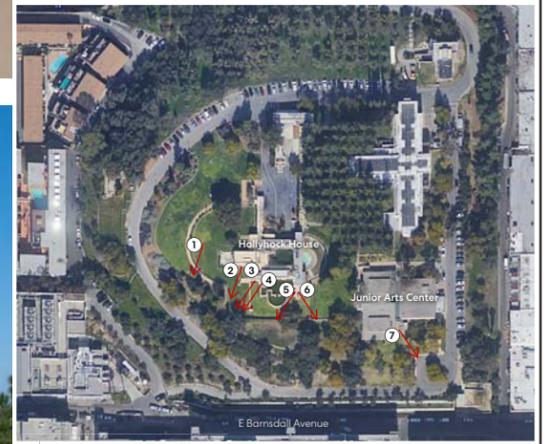
Proposed View



Existing View Without Tree



Proposed View Without Tree



- ① Hollyhock House's West Lawn
- ② Windows in the Living room
- ③ Windows in the Study
- ④ Windows in the Breakfast room
- ⑤ Windows in the Bedroom
- ⑥ Windows in the Bedroom
- ⑦ Barnsdall Junior Art Center

FIGURE II.C-G

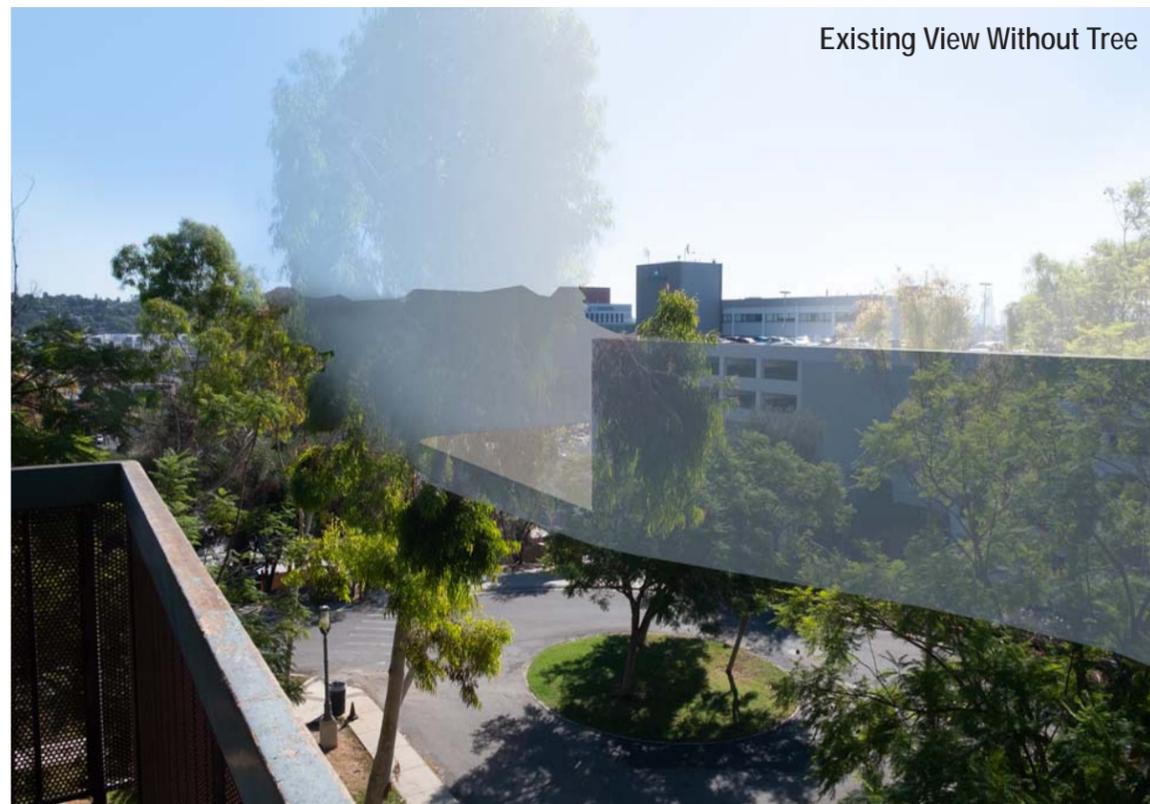
Viewshed Study of 1526 North Edgemont - Taken from Hollyhock House's Window in the Bedroom



Existing View



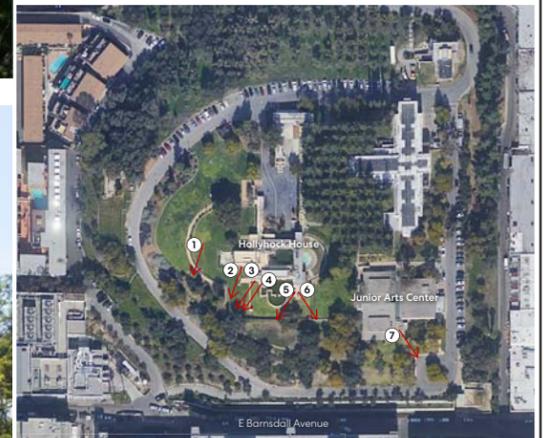
Proposed View



Existing View Without Tree



Proposed View Without Tree



- ① Hollyhock House's West Lawn
- ② Windows in the Living room
- ③ Windows in the Study
- ④ Windows in the Breakfast room
- ⑤ Windows in the Bedroom
- ⑥ Windows in the Bedroom
- ⑦ Barnsdall Junior Art Center

FIGURE II.C-H

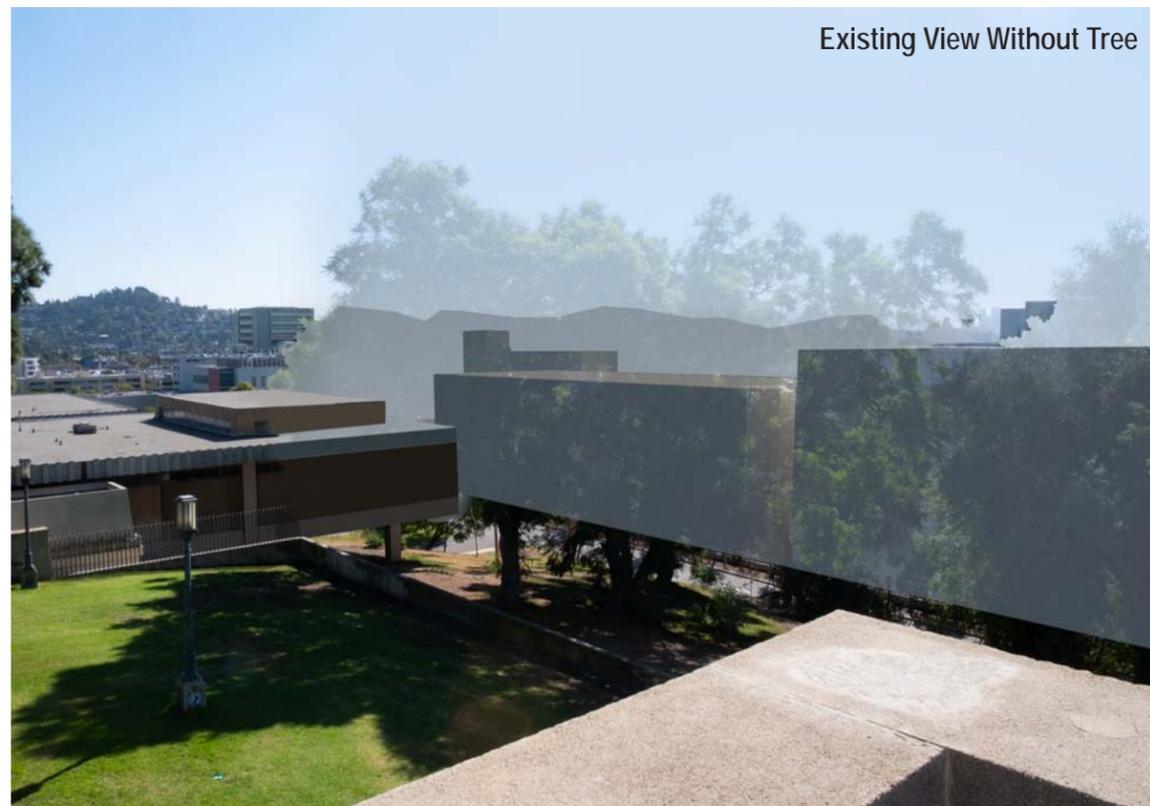
Viewshed Study of the Replacement Parking Structure - Taken from the Barnsdall Junior Art Center



Existing View



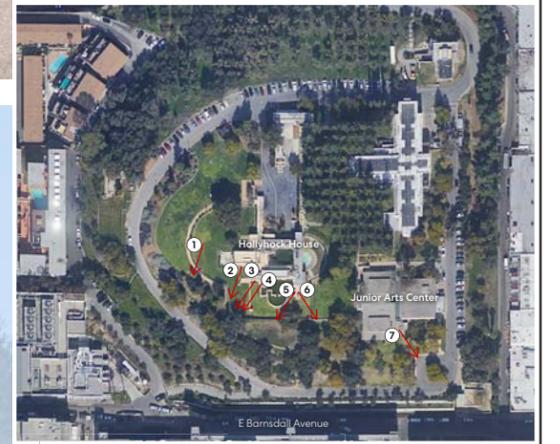
Proposed View



Existing View Without Tree



Proposed View Without Tree



- ① Hollyhock House's West Lawn
- ② Windows in the Living room
- ③ Windows in the Study
- ④ Windows in the Breakfast room
- ⑤ Windows in the Bedroom
- ⑥ Windows in the Bedroom
- ⑦ Barnsdall Junior Art Center

FIGURE II.C-1

Viewshed Study of the Replacement Parking Structure - Taken from Hollyhock House Bedroom

