CITY OF SANTA CLARITA

HENRY MAYO NEWHALL HOSPITAL MASTER PLAN SECOND AMENDMENT

DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

SCH No. 2004111149

Prepared for:

City of SANTA CLARITA

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LIST OF APPENDICES

LIST OF FIGURES

LIST OF TABLES

In 2008, the City of Santa Clarita (City) certified the Final Environmental Impact Report (EIR) for the Henry Mayo Newhall Memorial Hospital (HMNH) Master Plan and adopted a Master Plan and Development Agreement for the hospital. In 2016, the City adopted an EIR Addendum for a Specific Plan for the HMNH, amendment to the Master Plan, and an amendment to the Development agreement. Due to the proposed amendments to the 2016 Specific Plan and a second amendment to the 2008 Master Plan and Development Agreement, this Draft Supplemental Environmental Impact Report (SEIR) has been prepared to update the environmental review for the HMNH Master Plan and Specific Plan as required by the California Environmental Quality Act (CEQA) and in accordance with Section 15163 of the CEQA Guidelines. This Draft SEIR contains only the information necessary to make the Master Plan EIR and Addendum adequate for the Master Plan and Specific Plan, as revised, and/or address changes in circumstances.

1.1. Project Location

The HMNH campus encompasses approximately 29.77 acres of land that is generally located north of the intersection of McBean Parkway and Orchard Village Road, east of Interstate 5 (I-5) in the City of Santa Clarita in northern Los Angeles County. The HMNH campus is located at 23845 McBean Parkway and includes hospital and emergency service buildings owned by the HMNH, as well as other non-HMNH-owned, hospital-affiliated medical office buildings that house physical specialists, outpatient services, and programs providing continuing medical education to physicians, hospital staff, and other clinical professionals in the Santa Clarita Valley.

The HMNH proposes an amendment to its 2016 Specific Plan and a second amendment to its 2008 Master Plan and Development Agreement to permit the development of up to 200,000 square feet of building area for a new Diagnostic and Treatment (D&T) Building, a new Inpatient Building No. 2 (IP-2 Building), and clinical services, plus up to 292 new parking spaces to be added to Parking Structure No. 4 (PS-4) through the addition of three aboveground levels to the existing structure (Project).

The development of the D&T Building and IP-2 Building would be located on existing parking lots (Parking Lots D and I, as well as part of Lot H) bounded by the Main Hospital Building on the south, the new Inpatient Building No. 1(IP-1 Building) completed in 2019 on the west, the Nursing Pavilion on the north, and an internal access road on the east. The existing underground parking structure/surface parking lot (PS-4), is located immediately to the north of the main entrance to the HMNH campus. In total, Lot D, Lot I, portion of Lot H, and PS-4, encompass the Project Site.

1.2. Proposed Project and Objectives

The HMNH Specific Plan and Master Plan, as amended, are intended to guide the long-term buildout of an integrated, efficient, comprehensive health care facility to help serve the growing Santa Clarita Valley by achieving the following objectives:

- Help meet the health care needs of Santa Clarita Valley's existing population and planned future population growth.
- Implement a long-term plan for expansion of the existing HMNH campus that would help meet the expected growth in demand for health care services and allow the hospital to apply for State-required approvals.

- Enhance and expand the HMNH to provide patients with personalized care, state-of-the-art medical technology, and a professional staff within a single HMNH campus environment.
- Accommodate expansion that would bring two new buildings online over time as needed while ensuring the continuance of existing operations and enabling further expansion of needed facilities.
- Maintain the viability of the hospital on a site that would continue to be centrally located within the HMNH's 680-square-mile service area as the community grows.
- Implement a well-planned HMNH Master Plan campus that is attractive and promotes quality development consistent with the visual character of the Project area.
- Establish a campus that would attract and retain physician specialists and establish Centers of Excellence, which are defined as highly specialized health care services via physician or hospital-authorized providers or hospital collaboration around a disease category.
- Develop a medical campus designed with patients in mind by linking inpatient services and medical buildings in a single setting, providing safe access and transit opportunities.
- Minimize visual impacts of the HMNH campus using enhanced building design and landscaping and focusing more intensive development near the center of the site.
- Apply land use buffering techniques between the two new buildings (including required parking) and adjacent residential uses through use of building setbacks and enhanced landscaping.
- Continue to modernize and upgrade the HMNH campus and other on-site supportive mechanical facilities to ensure the long-term viability of existing and new buildings.
- Implement an efficient vehicular and pedestrian circulation system that ensures ease of movement throughout the site.
- Ensure that future development of the HMNH campus is served by adequate on-site parking facilities to accommodate patients, visitors, and medical staff.

With the proposed amendments, the total buildout capacity of hospital and medical office space within the Specific Plan and Master Plan area would increase from 698,000 square feet to 898,000 square feet.

The new D&T Building would be constructed within existing Parking Lot D. This building would be three stories above grade, 60 feet in height, and contain approximately 84,300 square feet of space, including a new, below-grade basement. Accessory uses in this building could include various clinical-related uses, a pharmacy, and imaging areas. Six, 500-kilowatt diesel-fueled emergency generators and four heating, ventilation, and air conditioning (HVAC) package units would be installed on the roof of this building. The Project would also involve relocation of the hospital's main entry to in front of the D&T Building, which would require removal of 16 parking spaces from Lot H.

The new IP-2 Building would be constructed within existing Parking Lots D and I immediately adjacent to the new D&T Building. The building would be five stories above grade, 80 feet in height, and contain approximately 115,700 square feet of space, including a below-grade basement. Uses in this building would include 92 inpatient beds (relocated from the existing Main Hospital Building), support services, public spaces, and additional D&T facilities. Six HVAC package units would be installed on the roof of this building.

There would be no change in the maximum number of beds (i.e., 368 beds) permitted under the approved 2008 Master Plan. However, the Project would move approximately 92 beds from the existing Main Hospital Building to the new IP-2 Building. The Project would result in 360 total hospital beds on the HMNH campus; however, the total number of hospital beds in each use may be decreased and/or increased in the future provided the total number of beds does not exceed the maximum number of beds (368) approved in the 2008 Master Plan. The area within the existing Main Hospital Building currently containing the 92 beds, as well as the D&T facilities, would be converted to office uses, other administrative uses, and/or clinical/hospital support services.

Other aspects of the Project include amendments to building height standards, modifications to the campus parking plan, and relocating the HMNH's main entrance. Regarding building height, the 2008 Master Plan established five different building height zones for the HMNH campus. The Project Site is located in Zone 3, which imposes a height limit of 35 feet. The IP-2 Building with a height of 80 feet, the D&T Building with a height of 60 feet, and the addition of aboveground parking levels to PS-4 with a height of 40 feet would exceed this maximum building height. A provision within the amendments to the 2008 Master Plan and 2016 Specific Plan would extend Zone 5 (an 85-foot maximum height limit) to include Lots D and I and a part of Lot H and would extend Zone 4 (a 45.5-foot maximum height limit) to include PS-4. Regarding parking, the Project would increase the campus' total existing parking supply to 1,858 spaces. This increase is based on the proposed addition of 292 spaces to PS-4, as well as the proposed removal of 78 parking spaces from Lots D, H, and I. To manage parking demand, the Project would include several transportation demand management (TDM) and paid parking strategies designed to reduce parking demand and improve wayfinding and circulation within the HMNH campus. These TDM and paid parking strategies, include ride-sharing services, on-site shuttle services, a parking access, and revenue control system, and dynamic wayfinding signage. Finally, the Project would also involve the relocation of the main entry/drop-off area from its present location adjacent to the existing Main Hospital Building to a new covered drop-off area in front of the proposed D&T Building, which would remove several spaces from parking Lot H.

1.3. Areas of Controversy

The CEQA Guidelines require that a Draft SEIR identify areas of controversy known to the lead agency, including issues raised by other agencies and the public. Issues of concern were identified in the NOP, dated August 29, 2018, and can generally be categorized as aesthetics, air quality, energy, greenhouse gas (GHG) emissions, noise, transportation, tribal cultural resources, and utilities and service systems (water and wastewater). The following agencies responded to the NOP: Southern California Association of Governments (SCAG), Caltrans, the Sanitation Districts of Los Angeles County (the Sanitation Districts), the Los Angeles County Sheriff's Department and Fire Department (LACPD and LACFD), the Native American Heritage Commission (NAHC), and the California Division of Oil, Gas, and Geothermal Resources (DOGGR). In general, these agencies' comments (see **Appendix A**) focused on the need to undergo required consultations and to

comply with required codes and ordinances. Other comments focused on transportation/traffic impacts of the Project, consistency with existing regional plans, and system capacities. These issues have been incorporated into the environmental analysis of the Project, contained within Section 4.0, Environmental Analysis, or in Section 7.0 Effects Found Not to be Significant, of this Draft SEIR.

More specifically, the list of environmental topics, which are further discussed in Section 4.0, Environmental Analysis, of this Draft SEIR, is as follows:

- Aesthetics
- Air Quality
- Energy
- Greenhouse Gas Emissions
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities

Potential areas of controversy and issues to be resolved by the City's decisionmakers may include those environmental issue areas where the potential for a significant unavoidable impact has been identified. All impacts associated with the Project would be less than significant with the exception of one impact related to on-site noise during construction.

1.4. Alternatives

CEQA Guidelines Sections 15126.6 (a) and 15126.6(b) state that "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. In accordance with CEQA Guidelines Section 15126.6, this Draft SEIR contains a comparative impact assessment of alternatives, including the No Project Alternative, that would lessen the significant impacts of the Project.

The analyses presented in Sections 4.1 through 4.8 of this Draft SEIR determines that the Project would not generate new impacts beyond those identified in the 2008 Master Plan EIR, including a significant and unavoidable impact related to short-term construction noise. Therefore, the alternative identified in this Draft SEIR, in addition to the No Project Alternative, was selected considering the extent to which the alternative would (1) meet most of the objectives of the Project and (2) avoid or lessen the impacts of the Project related to short-term construction noise and with consideration given to other alternatives that were rejected. These alternatives are briefly described below. A comparative analysis of these alternatives is available in Section 5.0, Alternatives, of this Draft SEIR.

1.4.1. ALTERNATIVE 1: NO PROJECT/NO BUILD ALTERNATIVE

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a project on an identifiable property consists of the circumstance under which the project does not proceed. For purposes of the analysis contained within this SEIR, the No Project/No Build Alternative (Alternative 1) assumes that no new development would occur within the Project Site. The Project Site would continue to operate as paved surface parking lots (i.e., Lot D and Lot I, as well as Lot H) and a subterranean parking structure (i.e., PS-4).

1.4.2. ALTERNATIVE 2: REDUCED SIZE (80-PERCENT) ALTERNATIVE

The Reduced Size (80-Percent) Alternative (Alternative 2) has been identified as an alternative that would feasibility attain all of the Project's objectives while shortening the duration of construction impacts when compared to the Proposed Project. Alternative 2 proposes similar buildings and uses to the Proposed Project but reduced by approximately 20 percent. More specifically, both the new D&T Building and IP-2 Building would be reduced by one level. Similar to the Proposed Project, the proposed buildings would include a new basement to accommodate the mechanical equipment for each building. In addition, as with the Proposed Project, the existing hospital's main entry would be relocated in front of the D&T Building, which would also require removal of 16 parking spaces from Lot H. Under this alternative, the proposed parking addition to PS-4 would be reduced by one level when compared to the Proposed Project. Alternative 2 would add approximately 195 new parking spaces to PS-4 through the construction of two aboveground levels on top of the existing subterranean structure/surface parking lot.

Various alternatives were considered in Section 5.2, Alternatives Considered but Rejected, of this Draft SEIR, with the goal of substantially reducing, if not eliminating, the Project's significant construction noise impacts, which would occur during construction from the operation of construction equipment. These alternatives include rehabilitation of the Main Hospital Building, demolition of the Main Hospital Building and construction of a new tower, constructing the D&T and IP-2 Buildings on an alternative location of the HMNH campus, and constructing the D&T and IP-2 Buildings on an alternative location off-site. Significant construction noise impacts would be expected to occur during construction on-site with any development scenario since any scenario would need to utilize the same construction equipment. Further, because constructing new facilities off campus would preclude patients and care providers using the new facilities from accessing other necessary uses within the HMNH campus, the off-site location alternative was rejected.

1.4.3. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The No Project/No Build Alternative would have the least impact as it would not alter existing conditions and would not result in any of the short-term or long-term impacts that would occur as a result of the Proposed Project or Alternative 2. Section 15126.6(e)(2) of the State CEQA Guidelines requires that in those instances in which the No Project Alternative would be environmentally superior, the EIR must also identify which of the other alternatives would have the least environmental impact. The other alternative, Alternative 2, would be considered environmentally superior as it would have a slightly lesser level of impact during construction (e.g., energy, GHG emissions, and utilities) than the Proposed Project due to a shorter construction duration and overall reduction in building size and during operation (e.g., air quality, energy, GHG emissions, and utilities) due to an overall reduction in energy and utility consumption and overall daily trips generated by the addition to HMNH campus. However, neither alternative would meet the second Project objective related to implementing a long-term plan for expansion of the existing HMNH campus that would help meet the expected growth in demand for health care services and allow the hospital to apply for State-required approvals.

1.5. Approvals and Actions

Approvals required for implementation of the Project include, but are not limited to, the following:

- Certification of a Supplemental EIR to the 2008 Master Plan EIR;
- Amendment to the 2008 Master Plan and Development Agreement for the HMNH; and
- Amendment to the 2016 Specific Plan for the HMNH.

In addition to the specific discretionary actions listed above, other discretionary and ministerial permits and approvals may be or will be required, including, but not limited to, grading permits, excavation permits, foundation permits, and building permits.

1.6. Impacts, Mitigation Measures, and Unavoidable Impacts

This Draft SEIR has been prepared to assess potentially significant impacts on the environment that could result from implementation of the Project. For a detailed discussion regarding potential impacts, refer to Section 4.0, Environmental Analysis, of this Draft SEIR. A summary of Project-related impacts and a list of the proposed mitigation measures that are recommended in response to these Project impacts is provided in **Table 1-1.** This table also provides a determination of the level of significance of the Project impact after implementation of the recommended mitigation measures.

Table 1-1
Summary of Environmental Impacts and Mitigation Measures

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
AESTHETICS		
Threshold (c): Short-term, construction-related impacts would be less than significant given their short duration and the adherence to mitigation measures included in the 2008 HMNH Master Plan EIR, which were adopted by the City as part of the Master Plan approval. Operation of the Project would not conflict with the character and scenic quality of the area and the HMNH campus due to the steep slope on the northwestern edge of the campus, which serves as a visual buffer between residential areas and the HMNH campus; placement of existing buildings along the northwestern, southwestern, and western frontages of the HMNH campus, which obstruct views of the campus interior; the use of setbacks from property edges; consistency with zoning regulations and design guidelines requiring inclusion of architectural enhancements on building façades and Project Site landscaping; and existing mature vegetation along McBean Parkway.	No mitigation measures are required.	Impacts related to scenic and visual quality would be less than significant without mitigation
Threshold (d): Light and glare produced by the Project would be similar to the existing buildings and parking structure on the HMNH campus. Such light and glare sources include landscape lighting, overhead lights on internal campus streets, building accent lighting, overhead lighting in parking areas, and security lights. Although exempt from the City's outdoor lighting standards (Santa Clarita Municipal Code Section 17.51.050, Outdoor Lighting Standards), the Project would direct all lights downward and to be shielded so as to avoid off-site glare. Further, lights would not be directed up, disturbing nighttime views. The proposed buildings and parking structure addition would not be constructed of glare-producing materials. As such, the Project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.	No mitigation measures are required.	Impacts to light and glare would be less than significant without mitigation.
AIR QUALITY		
Threshold (a): The Project would not result in any exceedance of the South Coast Air Quality Management District's daily emissions thresholds for construction or operation for VOC, NO_x, PM_{10}, or $PM_{2.5}$ emissions. Therefore, the Project would not result in a cumulatively considerable net increase in criteria pollutant emissions for which the region is non-attainment under an applicable federal or State ambient air quality standard. Further, vehicle trip generation and planned development for the Project Site are concluded to have been anticipated in the SCAG growth projections because the land use designation and zoning would remain the same (i.e., Specific Plan), despite the increase in the building square footage within the Specific Plan area. Because the	No mitigation measures would be required.	Less than significant without mitigation.

Table 1-1, continued

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
addition of Project-generated employees to the City's estimated employee population would not exceed SCAG's population forecasts, implementation of the Project would not result in a conflict with, or obstruct implementation of, the applicable air quality plan, and impacts would be less than significant.		
Threshold (b): The Project would result in construction and operation-related Project emissions. Construction of the Project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips). Maximum daily emissions of NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions would occur during the grading phase, with maximum daily emissions of VOCs occurring during the architectural coating phase. Daily construction emissions would not exceed SCAQMD significance thresholds. Operation of the Project would generate emissions from mobile sources, area sources, energy sources, and stationary sources. The combined daily area, energy, mobile, and stationary source emissions would not exceed the SCAQMD operational thresholds Therefore, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or State ambient air quality standard. Therefore, Project impacts would be less than significant.	No mitigation measures would be required.	Less than significant without mitigation.
Threshold (c): The Project is located on an existing HMNH campus; therefore, there are healthcare facilities immediately adjacent to and surrounding the proposed buildings, the closest of which is the IP-1 Building, approximately 20 feet to the west of Lot D. Construction activities would not generate emissions in excess of site-specific Localized Significance Thresholds; therefore, site-specific construction impacts during construction of the Project would be less than significant. Further, the non-cancer chronic and acute hazard indices would not exceed SCAQMD thresholds. Thus, the proposed stationary sources would result in less-than-significant cancer, chronic, and acute health risk impacts at proximate sensitive residential receptors	No mitigation measures would be required.	Less than significant without mitigation.
Threshold (d): The Project entails operation of a hospital facility and would not result in the creation of a land use that is commonly associated with odors. Therefore, impacts related to other emissions (such as those leading to odors) adversely affecting a substantial number of people during Project operations would be less than significant.	No mitigation measures would be required.	Less than significant without mitigation.

Table 1-1, continued

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
ENERGY		
Threshold (a): Construction and operation of the Project would involve the use of many nonrenewable resources. The Project would be carried out in accordance with local and State regulations concerning building codes and safety and energy efficiency, including Title 24 requirements. Nonrenewable resources, primarily in the form of fossil fuels, natural gas, and fuel oils for construction equipment and vehicles, would be used throughout this Project; however, consumption of these resources would not be inefficient, wasteful, or unnecessary. As such, impacts would be less than significant.	No mitigation measures would be required.	Less than significant without mitigation.
Threshold (b): The Project is designed in a manner that is consistent with adopted energy conservation plans. It would comply with California's Title 24 Parts 6 and 11, which encourage energy efficiency and sustainable buildings, especially in new construction. The Project would also involve retrofitting the Main Hospital Building, where new equipment, plumbing, and wiring would all comply with Title 24, resulting in increased energy efficiency. Accordingly, the Project would not conflict with any adopted energy conservation plans, including those that address renewable energy and energy efficiency.	No mitigation measures would be required.	Less than significant without mitigation.
Threshold (c): The Project would result in an increase in electricity and natural gas demand during construction and operation. However, no major upgrades to the electrical or natural gas system are anticipated due to implementation of the Project, in part because energy demands are projected to decline over the next few years given increasing energy efficiency standards and technological innovations.	No mitigation measures would be required.	Less than significant without mitigation.
GREENHOUSE GAS EMISSIONS		
Threshold (a): The analysis determined that the construction emissions would be less than significant as GHG emissions would represent a small fraction of total Project-related emissions. GHG emissions resulting from Project operation would primarily result from vehicle exhaust and the consumption of electricity and natural gas for heating. Therefore, the Project has no additional impacts beyond those previously identified in the 2008 Master Plan EIR.	No mitigation measures would be required	Less than significant without mitigation.
Threshold (b): The analysis in the 2008 EIR found that while the Project would contribute to global climate change through direct emissions of GHGs (i.e., on-site area sources, off-site energy production required for on-site activities, and vehicle trips generated by the Project), the Project would neither assist nor hinder achievement of State GHG reduction goals. In addition, the Project would not consume excessive energy resources compared to business as usual levels. As such, impacts were determined to be less than significant.	No mitigation measures would be required	Less than significant without mitigation.

Table 1-1, continued

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
NOISE		
***Threshold (a)*:** The Project would have a less-than-significant noise impact with regard to off-site construction noise, on-site operation noise, and off-site operation noise. The only area that would have a significant noise impact would be during on-site construction as short-term construction noise levels would exceed the ambient noise level of 55 dBA L_{eq} near the southeastern corner of the Main Hospital Building by up to 35 dBA. On-site operational noise was evaluated for stationary sources, such as HVAC systems and emergency backup generators on the D&T Building/IP-2 Building, as well as stationary sources from PS-4 caused by traffic within the parking structure itself. None of these Project components would rise to a significant impact either individually or combined. Off-site operational impacts were evaluated by determining changes in traffic noise on multiple roadway segments in the vicinity of the Project Site. None of the segments evaluated would have an increase in noise that would be perceptible to the human ear, and, therefore, noise impacts would be less than significant.	The 2008 Master Plan EIR identified the following mitigation measures applicable to short-term significant construction noise impacts to off-site residences from PS-4 construction; they would also be applicable to address on-site impacts to the Main Hospital Building and IP-1 Building from construction of the D&T Building/IP-2 Building: **N1:** During all site excavation and grading, the Project applicant shall require the Project contractor(s) to equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. **N2:** The Project applicant shall require the Project contractor(s) to locate equipment staging in areas that would create the greatest distance between construction-related noise sources and noise-sensitive receptors nearest the Project Site during all Project construction, to the extent practicable. In addition, the following mitigation measure is recommended to further reduce on-site noise impacts to the Main Hospital Building and IP-1 Building from construction of the D&T Building/IP-2 Building: **S-N1:** The Project contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the Project Site.	Consistent with the 2008 EIR conclusions, **short-term construction noise impacts would remain significant and unavoidable** but would not result in any additional impacts beyond those identified in the 2008 Master Plan EIR.
***Threshold (b)*:** The Project would result in generation of construction and operational-related vibrations. During land clearing and construction activities for the Project, groundborne vibration would be produced by heavy-duty construction equipment. However. construction-related vibration associated with the Project would not be substantial and would not lead to annoyance or structural damage for the existing residences in the Project vicinity. Further, because construction would be undertaken on behalf of Henry Mayo Hospital, it is reasonable to assume adequate coordination between the construction contractor and hospital administration would occur in order	No mitigation measures would be required.	Less than significant without mitigation.

Table 1-1, continued

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
to accommodate hospital-related activities particularly prone to vibration interference during the construction process. On-site vibration impacts are, therefore, considered to be less than significant. Regarding long-term operation of the Project, the Project would include HVAC equipment with air compressor components; however, such components are limited in scale and would not be expected to produce substantial vibration.		
TRANSPORTATION		
***Threshold (a)*:** While LOS would no longer constitute a CEQA impact, it can still be used to inform decisionmakers on the overall effects of the Project. Twelve of the 14 intersections in the study area are operating at LOS D or better during the weekday a.m. and p.m. peak hours under Existing Baseline Conditions. Intersection No. 4 (McBean Parkway and Valencia Boulevard) and Intersection No. 10 (Orchard Village Road and McBean Parkway) are expected to operate at LOS E during one or both peak hours under Existing Baseline Conditions. All of the intersections in the study area would operate at LOS D or better during the weekday a.m. and p.m. peak hours under Existing with Project Conditions, except for intersection No. 4, which would continue to operate at LOS E during the p.m. peak hour. Similarly, 12 of the 14 intersections in the study area would operate at LOS D or better during the weekday a.m. and p.m. peak hours under Opening Year with Project Conditions. Intersection No. 4 (McBean Parkway and Valencia Boulevard) and Intersection No. 12 (Valencia Boulevard and Magic Mountain Parkway) are expected to continue to operate at LOS E during one or both peak hours under Opening Year with Project Conditions. The Project is expected to create incremental, but not significant, impacts at the 14 study intersections. In Future (2035) with Project Conditions, the Project is expected to create a significant impact at two of the 14 study intersections during both peak hours, specifically Intersection No. 9 (Orchard Village Road and Wiley Canyon Road) and Intersection No. 10 (Orchard Village Road and McBean Parkway). In regard to mass transit, the Project would not conflict with existing or future transit services since circulation through surrounding streets, such as McBean Parkway and Orchard Village Road, would not be impacted by Project-related improvements on the HMNH campus.	The following mitigation measures were developed to mitigate the potentially significant Project-related transportation impacts identified in the Future (2035) Condition. It should be noted that the previous Development Agreement associated with the approved Master Plan required the construction of various traffic mitigation measures, several of which have already been constructed in accordance with the Development Agreement, to mitigate impacts associated with the implementation of the Master Plan. These mitigation measures would be in addition to and/or supersede the traffic improvement provisions included in the previous Development Agreement. **S-TR1:** Orchard Village Road/Wiley Canyon Road: The existing traffic signal phasing shall be modified to include a right-turn overlap phase to the westbound approach of Wiley Canyon Road. The right-turn phase proposed for Wiley Canyon Road shall overlap with the existing left-turn phase provided for the southbound Orchard Village Road approach. No physical improvements to the existing lane configurations are required. **S-TR2:** Orchard Village Road/McBean Parkway: The southbound Orchard Village Road approach to the McBean Parkway intersection shall be reconfigured to be consistent with the lane configuration in the City approved design plans for this intersection.	Less than significant with mitigation.

Table 1-1, continued

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
***Threshold (b)*:** The City's Transportation Analysis Guidelines state that "projects located within Transit Priority Areas (TPAs) may also be exempt from VMT analysis." Because the Project Site is less than 0.5 mile from Routes 797 and 799 bus stops near the intersection of McBean Parkway and Orchard Village Road, the Project Site is located within a Transit Priority Area and can be screened from VMT analysis. There are situations in which a presumption of a less-than-significant impact may not be appropriate, including when a project has a FAR of 0.75 or less, when a project includes more parking than required by the City, when a project is inconsistent with the SCAG RTP/SCS, and when a project replaces affordable residential units with a small number of moderate- or high-income residential units. Because the Project Site is located within 0.5 mile of an existing stop along an HQTC, and because none of the above-mentioned situations precluding a less-than-significant finding apply to the Project, the Project is screened from VMT analysis given its proximity and location as described above. Therefore, the City can presume that the Project would have a less-than-significant impact on VMT, per CEQA Guidelines Section 15064.3 (b)(1).	No mitigation measures are required.	Less than significant without mitigation.
***Threshold (c)*:** The Project would not introduce design features, such as sharp curves or dangerous intersections. While the Project Site would move the main hospital drop-off from the current location in front of the existing Main Hospital Building to the front of the proposed IP-2 Building, these internal roadways would be constructed in accordance with the City's design standards. Furthermore, the proposed D&T Building and IP-2 Building would host hospital uses that would be consistent with existing uses on the HMNH campus. As such, the Project would not construct any incompatible uses that are inconsistent with the surrounding area. Therefore, the Project would not substantially increase hazards due to the Project's geometric design features, and impacts related to traffic hazards would be less than significant	No mitigation measures are required.	Less than significant without mitigation.
***Threshold (d)*:** The Proposed Project's ingress, egress, and circulation are required to meet Los Angeles County Fire Department's standards, ensuring new developments provide adequate access for emergency vehicles. The Project Site and the surrounding roadways and internal driveways do not pose any unique conditions that would limit the ability for emergency responders to access the Project Site. Further, final Project Plans are subject to review and approval by the Los Angeles County Fire Department to ensure compliance with established regulations and policies. Additionally, the Project is required to prepare a construction traffic management plan, which would require approval by the City, for any proposed street closures associated with construction activities at PS-4. With compliance with required regulations related to emergency access and circulation and approval of a construction traffic management plan, the Project would not result in significant impacts due to inadequate emergency access.	No mitigation measures are required.	Less than significant without mitigation.

Table 1-1, continued

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
TRIBAL CULTURAL RESOURCES		
***Threshold (a)*:** Due to the Project's proposed location, the lack of listed sites, and no former tribal areas in the direct vicinity, impacts on tribal cultural resources were determined to be less than significant. Based on this information, the City, in its discretion and supported by substantial evidence, finds that the Project Site does not contain any resources determined by the City to be significant pursuant to the criteria set forth in Subdivision (c) of PRC Section 5024.1. However, the applicant has entered into an agreement with the Fernandeño Tataviam Band of Mission Indians that will include Native American monitoring during initial grading operations (excavation) of the Lot D area. Accordingly, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe.	No mitigation measures would be required.	Less than significant without mitigation.
UTILITIES		
***Threshold (a)*:** While the proposed IP-2 Building would contain 92 hospital beds and the D&T Building would including diagnostic and treatment facilities, these 92 beds and diagnostic and treatment facilities currently exist on the HMNH campus. Therefore, the proposed uses are not new as they are currently generating wastewater on the Project Site. A total of 136,000 square feet in the Main Hospital Building would be repurposed as part of the Project, which would result in a minor increase in wastewater generation as compared with existing conditions. However, State and local regulations relating to water efficiency, as well as the Sanitation Districts' existing trunk sewer capacity means that the Project would not require an expansion or relocation of wastewater treatment facilities. Therefore, Project impacts would be less than significant.	No mitigation measures would be required.	Less than significant without mitigation.
***Threshold (b)*:** Because the uses that would occupy the proposed IP-2 Building and the D&T Building currently exist on the campus in other buildings, the only portion of the Project that would generate a measurable increase in water demand would be the 138,000 square feet of space in the Main Hospital Building that would be backfilled with office space, storage, MRI, and other areas. This area would generate minimal water demand, representing approximately 0.07 percent, 0.1 percent, and 0.12 percent of the 2020, 2025, and 2030 projected water surpluses in Santa Clarita. Further, Santa Clarita Valley Water Agency's existing water delivery infrastructure located in McBean Parkway would sufficiently serve the Project. Impacts would be less than significant.	No mitigation measures would be required.	Less than significant without mitigation.
***Threshold (c)*:** The Santa Clarita Valley Joint Sewer System has a total permitted wastewater treatment capacity of 28.1 million gallons per day (mgd) and the Sanitation Districts' trunk sewer located in McBean Parkway near Avenida Navarre has an available capacity of 1.8 mgd. The Project's 41,400 gpd of wastewater generation would represent approximately 2 percent of the existing capacity of the trunk sewer	No mitigation measures would be required.	Less than significant without mitigation.

Table 1-1, continued

Topic/Impacts	Mitigation Measures	Level of Significance After Mitigation
line located in McBean Parkway that serves the Project Site. Further, system capacity would be confirmed through preconstruction review of Project plans by the Sanitation District. Therefore, impacts on wastewater system capacity would be less than significant.		

2.1. Purpose of the SEIR

This Draft Supplemental Environmental Impact Report (SEIR) was prepared in accordance with and in fulfillment of the California Environmental Quality Act (CEQA). An EIR is described in CEQA Guidelines Section 15121(a) as a "public informational document that analyzes the environmental effects of a project, identifies ways to minimize the significant impacts, and describes reasonable alternatives to the project." An SEIR is described in CEQA Guidelines Section 15163(a)(2) as a document which describes "minor additions or changes…necessary to make the previous EIR adequately apply to the project in the changed situation." This Draft SEIR supplements an EIR prepared for the Henry Mayo Newhall Hospital Master Plan in 2008 (SCH #2004111149), as well as an addendum to this 2008 EIR, prepared for the Henry Mayo Newhall Hospital Specific Plan in 2016.

A "project" refers to the whole of an action that has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]). The City of Santa Clarita (City), as the lead agency, has determined that adoption and implementation of amendments to the 2008 Master Plan, 2016 Specific Plan, and Development Agreement for the Henry Mayo Newhall Hospital (HMNH) is a project within the CEQA definition.

This document analyzes the actions associated with the Project to determine the short-term and long-term effects associated with their implementation. This SEIR discusses both the direct and indirect impacts of this Project, as well as the cumulative impacts associated with other past, present, and reasonably foreseeable future projects. CEQA requires the preparation of an objective full disclosure document to inform agency decision-makers and the public of the direct and indirect environmental effects of the proposed action, provide mitigation measures to reduce or eliminate significant adverse effects, and identify and evaluate reasonable alternatives to the Proposed Project.

2.2. Project Summary

The Project Site encompasses approximately 29.77 acres of land that is generally located north of the intersection of McBean Parkway and Orchard Village Road, east of Interstate 5 (I-5) in the City of Santa Clarita in northern Los Angeles County. The HMNH campus is located at 23845 McBean Parkway (Assessor's Parcel Numbers 2861-073-010, 2861-073-11, and 2861-073-012).

The Proposed Project involves an amendment to the approved 2016 Specific Plan and a second amendment to the 2008 Master Plan and Development Agreement to permit the development of up to 200,000 square feet of building area for a new Diagnostic and Treatment (D&T) Building, a new Inpatient Building No. 2 (IP-2 Building), and up to 292 new parking spaces to be added to the existing subterranean PS-4 parking structure through the addition of three aboveground parking stories (four levels, including rooftop parking).

The new D&T Building would be constructed within existing Parking Lot D and portion of Parking Lot H. This building would be three stories and 60 feet in height and contain approximately 84,300 square feet of space that would include a basement. Uses in this building could include various clinical-related uses, a pharmacy, and imaging areas.

The new IP-2 Building would also be constructed within existing Parking Lot D and Parking Lot I, immediately adjacent to the new D&T Building. The building would be five stories and 80 feet in height and contain approximately 115,700 square feet of space that would also include a basement. Uses in this building would include 92 inpatient beds (relocated from the existing Main Hospital Building), support services, public spaces, and additional diagnostic and treatment facilities. The area in the existing Main Hospital Building currently containing the 92 beds would be converted to office uses, other administrative uses, and/or clinical/hospital support services.

For more detailed information about construction and operation, please refer to Section 3.0, Project Description.

2.3. Type of Document

The CEQA Guidelines identify several types of EIRs, each applicable to different project circumstances. As stated above, this SEIR has been prepared pursuant to CEQA Guidelines Section 15163. This document supplements the EIR prepared for the HMNH Master Plan (2008), as well as the 2016 Addendum to the 2008 Master Plan EIR, which was prepared to evaluate the environmental effects of a proposed General Plan Amendment to re-designate the Project Site as Specific Plan (SP), a zone change to Specific Plan (SP), and amendments to the 2008 Master Plan and Development Agreement. The analysis associated with an SEIR focuses on the changes in the environment that would occur as a result of Project implementation, specifically providing the information necessary to make the previous 2008 Master Plan EIR adequate to analyze the proposed changes on the HMNH campus.

2.4. Organization and Scope

Sections 15122 through 15132 of the CEQA Guidelines identify the content requirements for Draft and Final EIRs. An EIR must include a description of the environmental setting, an environmental impact analysis, mitigation measures, alternatives, identification of significant irreversible environmental impacts, and growth-inducing and cumulative impacts. The environmental issues addressed in this SEIR were established through review of the 2008 Master Plan EIR and 2016 Specific Plan Addendum, as well as by responses to the Notice of Preparation (NOP) released on August 31, 2018 (see **Appendix A**). Based on comments received in response to the NOP (see **Appendix A**, the City of Santa Clarita has determined the scope for this Draft SEIR.

This Draft SEIR is organized in the following manner:

- Section 1.0, Executive Summary

  This section provides a project narrative and identifies environmental impacts and mitigation measures in a summary table, consistent with CEQA Guidelines Section 15123.

- Section 2.0, Introduction and Purpose

  This section provides an introduction and overview of the Supplemental EIR.

- Section 3.0, Project Description

  This section describes the project in detail, including the intended objectives, background information, proposed physical changes, and technical characteristics of the Proposed Project.

- Section 4.0, Environmental Analysis

  This section contains an analysis of environmental topic areas as identified below. Each subsection contains a description of the Proposed Project's existing setting, the regulatory environment, the thresholds of significance, Project-related and cumulative impacts, and recommended mitigation measures, if applicable.

  This Draft SEIR addresses environmental topics in the following sections:

  - 4.1 Aesthetics, Light, and Glare
  - 4.2 Air Quality
  - 4.3 Energy
  - 4.4 Greenhouse Gas Emissions
  - 4.5 Noise
  - 4.6 Transportation
  - 4.7 Tribal Cultural Resources
  - 4.8 Utilities and Service Systems (Wastewater and Water Supply)

- Section 5.0, Alternatives to the Proposed Project

  CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to the Project that can feasibly attain the basic objectives of the Project and avoid and/or substantially lessen any of the significant effects of the Project. This section discusses alternatives to the Project, including the CEQA-mandated "No Project Alternative," that are intended to avoid or reduce the Project's significant environmental impacts.

- Section 6.0, Other CEQA Considerations

  This section contains discussions and analysis of various topical issues mandated by CEQA. These topics include significant environmental effects that cannot be avoided if the Project is implemented, as well as growth-inducing impacts.

- Section 7.0, Effects Found Not To Be Significant

  This section addresses the following environmental issue areas determined to have no impact or a less-than-significant impact based on the significance thresholds:

  - Aesthetics (Scenic Vistas and Scenic Resources)

- Agriculture and Forestry Resources
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise (Airport and Airstrip)
- Population and Housing
- Public Services (Fire Protection Services, Police Protection Services, Schools, and Parks)
- Recreation
- Utilities (Telecommunication Facilities

Because no significant impacts were determined to occur with regard to such environmental issue areas, no further analysis was required or conducted as part of preparation of this Draft SEIR.

- Section 8.0, References

  This section lists the documents and other reference sources used in support of the environmental analyses considered in the Draft SEIR.

- Appendices

  This section includes all notices and other procedural documents pertinent to the Draft SEIR, as well as technical materials prepared to support the environmental analysis.

2.5. Compliance with CEQA

According to Section 15163(c) of the CEQA Guidelines, a supplement to an EIR shall be given the same kind of notice and public review as is given to a draft EIR under Section 15087. Per Section 15087 of the CEQA Guidelines, the City (1) publishes a notice of availability of a Draft SEIR in a newspaper of general circulation, which states that the Draft SEIR will be available for review at City Hall, Valencia Public Library, and Old Town Newhall Library; and (2) prepares and transmits a Notice of Completion (NOC) to the State Clearinghouse. Proof of publication is available at the City of Santa Clarita City Hall. Any public agency or members of the public desiring to comment on the Draft EIR must submit their comments in writing to the individual identified on the NOC prior to the end of the public review period. Upon the close of the public review period, the City will then proceed to evaluate and prepare responses to all written comments regarding CEQA-related issues received from both citizens and public agencies during the public review period.

The Final SEIR will consist of this Draft SEIR, revisions to this Draft SEIR, and responses to comments addressing concerns raised by responsible agencies or reviewing parties. After the Final SEIR is completed and at least 10 days prior to its certification, a copy of the response to comments made by public agencies on this Draft SEIR will be provided to the respective agency.

2.6. SEIR Scoping Process

During the preparation of this Draft SEIR, an effort was made by the City to contact various federal, State, regional, and local government agencies and other interested parties to solicit comments and inform the public of the Proposed Project. This included distribution of an NOP and notification of a public scoping meeting. The NOP was published with the Los Angeles County Clerk and the State Clearinghouse on August 31, 2018, which provided instructions for how to comment on the scope of the SEIR, a project description, a list of environmental factors potentially affected by the Proposed Project, and notification of a public scoping meeting, held on September 13, 2018, at the City of Santa Clarita City Hall.

This Draft SEIR focuses primarily on changes in the environment that would result from the Proposed Project. This Draft SEIR identifies potential impacts resulting from the construction and operation of the Proposed Project and provides measures to mitigate potential significant impacts. Impacts that cannot be mitigated to less-than-significant levels are also identified. Accordingly, this Draft SEIR addresses impacts in the following areas:

- Aesthetics
- Air Quality
- Energy
- Greenhouse Gas Emissions
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities/Service Systems

Issues for which no significant impacts are anticipated to occur as a result of the Proposed Project are addressed in Section 7.0, Effects Found Not To Be Significant, of this Draft SEIR.

2.7. Incorporation by Reference

Pertinent documents relating to this Draft SEIR have been cited in accordance with Section 15148 of the CEQA Guidelines, which encourages "incorporation by reference" as a means of reducing redundancy and length of environmental reports. The following documents are available for public review at the City of Santa Clarita and hereby incorporated by reference into this Draft SEIR:

- City of Santa Clarita General Plan, June 2011.
- City of Santa Clarita Municipal Code.
- Draft Environmental Impact Report for the Henry Mayo Newhall Memorial Hospital Master Plan (SCH #2004111149), September 2008.
- Final Environmental Impact Report for the Henry Mayo Newhall Memorial Hospital Master Plan (SCH #2004111149), November 2008.
- Henry Mayo Newhall Hospital Specific Plan, March 2016.
- Addendum to the Henry Mayo Newhall Memorial Hospital Master Plan Certified Environmental Impact Report (SCH #2004111149), March 2016.

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3.1. Introduction

The Henry Mayo Newhall Hospital (HMNH) proposes an amendment to its 2016 Specific Plan and a second amendment to its 2008 Master Plan and Development Agreement to permit the development of up to 200,000 square feet of building area for a Diagnostic and Treatment (D&T) Building, another Inpatient Building (Inpatient Building No. 2 (IP-2 Building)), and clinical services, plus the addition of three aboveground parking stories (four levels, including rooftop parking) to the existing PS-4 parking structure (Project). With the proposed amendments, the total buildout capacity of hospital and medical office space within the Specific Plan and Master Plan area would increase from 698,000 square feet to 898,000 square feet.

This section of the EIR describes the Project in detail. More specifically, the subsections that follow provide a description of the Project's location; a description of the Project Site's characteristics; a statement of Project's objectives; a general description of the Project's technical, economic, and environmental characteristics; and a statement briefly describing the intended uses of the EIR.

3.2. Project Location

The HMNH campus encompasses approximately 29.77 acres of land that is generally located north of the intersection of McBean Parkway and Orchard Village Road, east of Interstate 5 (I-5) in the City of Santa Clarita in northern Los Angeles County; refer to **Figure 3-1**, Regional Location Map. The HMNH campus is located at 23845 McBean Parkway (Assessor's Parcel Numbers 2861-073-010, 2861-073-11, and 2861-073-012); refer to **Figure 3-2**, HMNH Campus Vicinity Map. The HMNH campus includes hospital and emergency service buildings owned by the HMNH, as well as other non-HMNH-owned, hospital-affiliated medical office buildings that house physical specialists, outpatient services, and programs providing continuing medical education to physicians, hospital staff, and other clinical professionals in the Santa Clarita Valley.

The proposed amendments to the 2008 Master Plan, 2016 Specific Plan, and Development Agreement involve the development of two new buildings that would be located on existing parking lots (Parking Lots D and I, as well as part of Lot H) bounded by the Main Hospital Building on the south, the new Inpatient Building No. 1(IP-1 Building) completed in 2019 on the west, the Nursing Pavilion on the north, and an internal access road on the east, as shown in **Figure 3-3**, Aerial View of Existing Uses on the HMNH Campus. The proposed amendments would also involve the addition of aboveground levels to an existing underground parking structure/surface parking lot (PS-4), located immediately to the north of the main entrance to the HMNH campus; modification to the parking plan to permit both paid and assigned parking and adopt the HMNH Parking Demand Study that establishes the parking requirements for the campus; and various amendments, including a 10-year extension, to the Development Agreement. Together, Lot D and PS-4 encompass the Project Site discussed in this Draft SEIR.

3.3. Site Characteristics

3.3.1. HMNH Campus and Project Site

The HMNH campus currently comprises 578,000 square feet of building area, including 377,415 square feet of hospital and related uses (including the new five-story IP-1 Building), 24,425 square feet of support facilities, and 176,160 square feet of medical offices (see **Figure 3-3**).

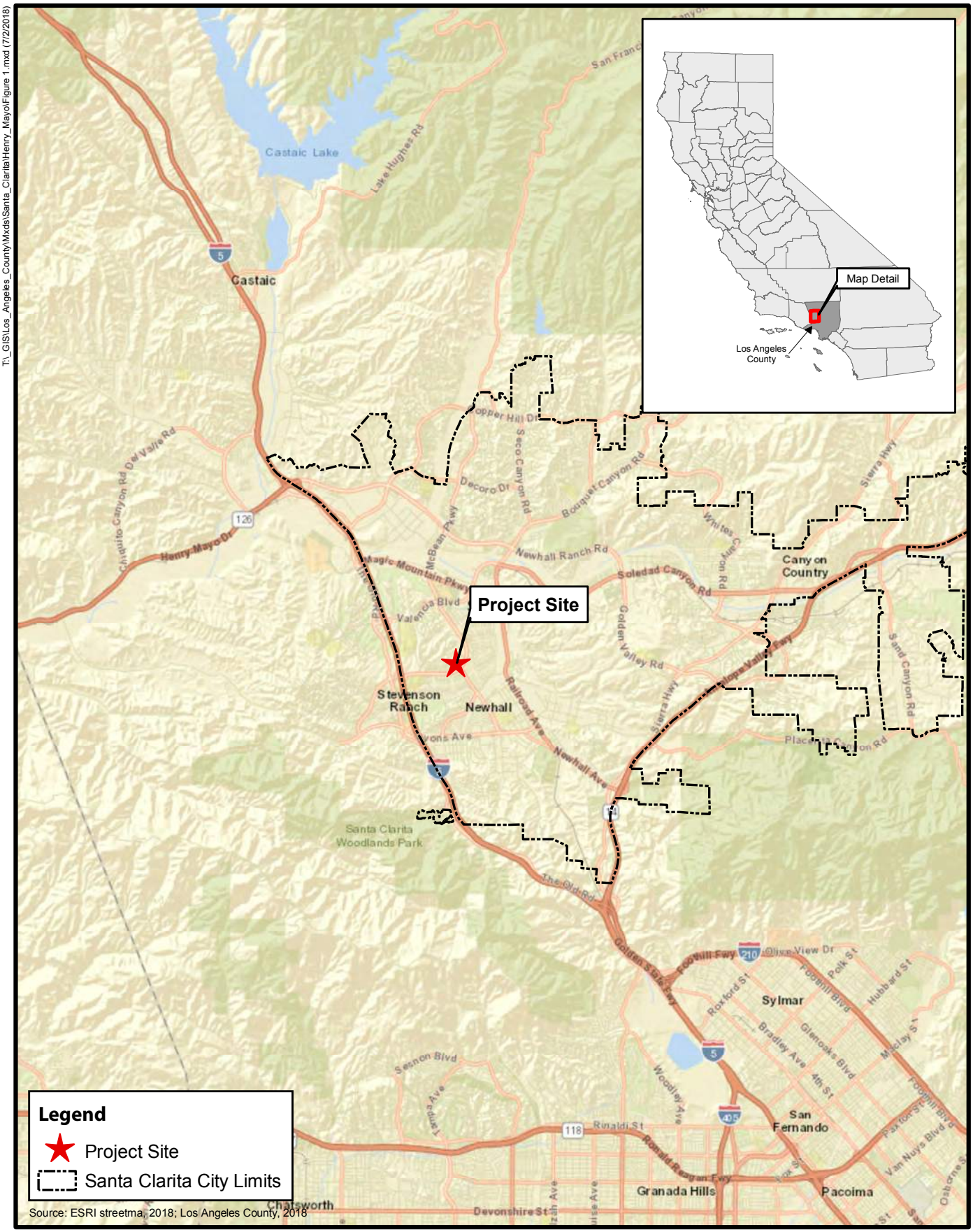

FIGURE 3-1
Regional Location Map

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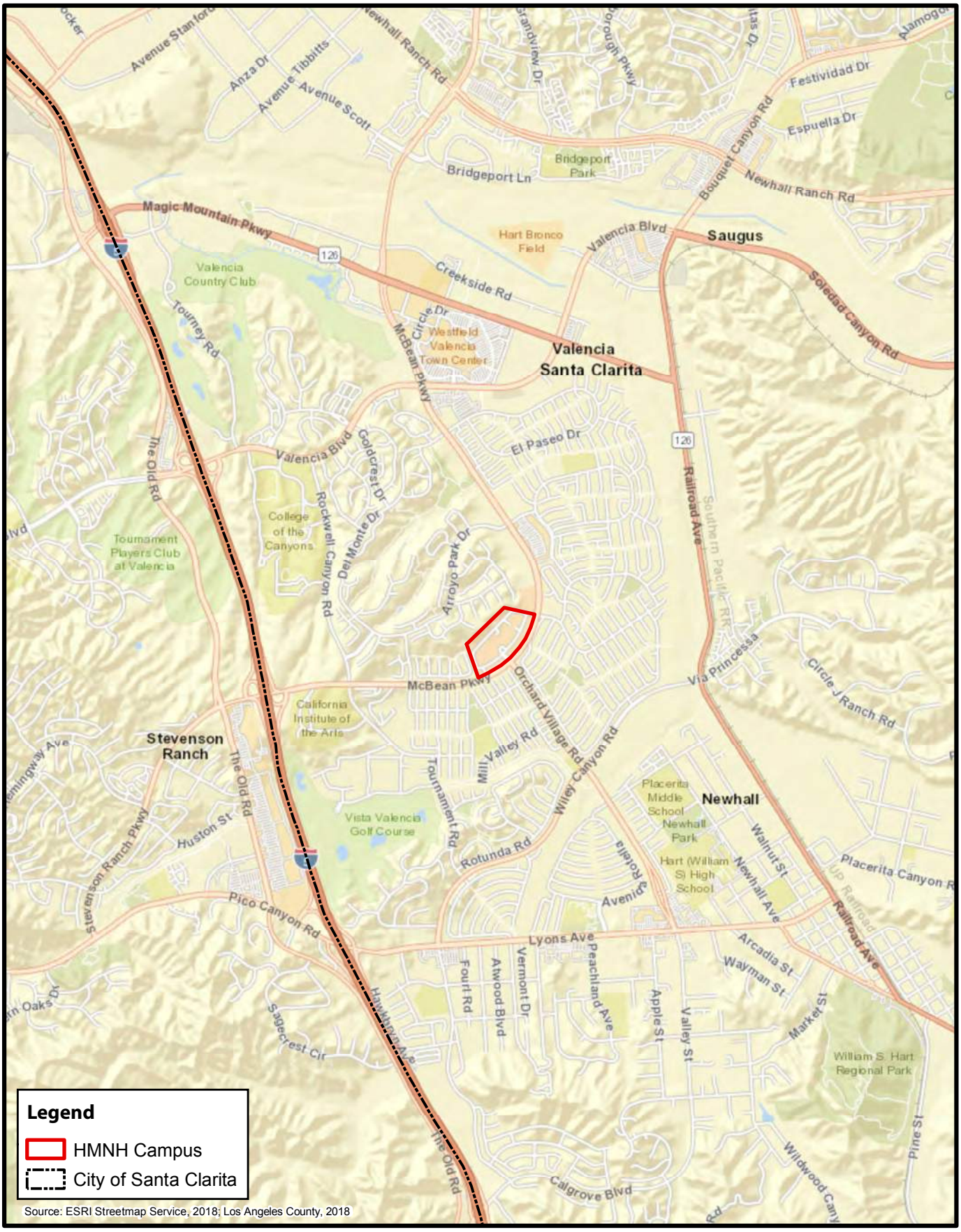

FIGURE 3-2
HMNH Campus Vicinity Map

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Not To Scale

FIGURE 3-3
Aerial View of Existing Uses on the HMNH Campus

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Currently, access to the HMNH campus is primarily from the main entrance at the terminus of Orchard Village Road and its intersection with McBean Parkway. Two secondary access points also are provided: one signal-controlled shared driveway with adjacent medical-related uses at the northern end of the campus at the intersection of Avenida Navarre and McBean Parkway and a driveway at the southern end of the campus along McBean Parkway.

The location of the proposed hospital buildings comprises existing surface parking lots (Parking Lot D, Lot I, and portion of Lot H). When the NOP for this Draft SEIR was issued in 2018, Lot D was occupied by hospital-affiliated temporary trailers and temporary construction trailers used by the contractors for the construction of IP-1 Building.[1] With completion of the IP-1 Building, these trailers were removed, and Lot D was returned to a use as a surface parking lot. Construction of the proposed hospital buildings would also require removal of Lot I (eight parking spaces located immediately south of the Nursing Pavilion), and a portion of Lot H (located immediately south of Lot D). The location of the proposed aboveground parking structure is currently that of a subterranean parking structure (PS-4), which comprises three levels of subterranean parking and a partially covered surface parking level.

The City of Santa Clarita (City) adopted a Master Plan and Development Agreement for the HMNH in 2008 and a Specific Plan, Amendment to the Master Plan, and an amendment to the Development Agreement for the HMNH in 2016. As a result of the 2016 Specific Plan, the General Plan and Zoning designation for the HMNH campus was changed from Public/Institutional (PI) to Specific Plan (SP). Further description of the 2008 Master Plan and the 2016 Specific Plan is provided below.

3.3.2. SURROUNDING LAND USES

The areas immediately adjacent to the HMNH campus include the following uses, as shown in **Figure 3-4**, Aerial View of Surrounding Uses, with the zoning for the surrounding area shown in **Figure 3-5**, Zoning Designations of the Surrounding Area:

- **North and Northeast:** Land uses consist of detached single-family residences along Bellis Drive; medical office buildings; the Sunrise at Sterling Canyon facility (beyond the medical office buildings), which is a senior living facility that provides independent living, assisted living, and hospice care; townhomes along McBean Parkway north of Sunrise at Sterling Canyon; and Valencia United Methodist Church east of McBean Parkway and north of Avenida Navarre.
- **East and Southeast:** Land uses consist primarily of single-family residences (developed in 1969), which are located east of McBean Parkway.
- **West and Northwest:** Land uses consist primarily of single-family residences (developed in 1987), along Anzio Way, Parma Court, Milano Lane, Tossano Drive, and Sardinia Court, and open space.
- **South and Southwest:** Land uses consist primarily of single-family residences located south of McBean Parkway constructed in 1969, as well as single-family homes constructed in 1978 north of McBean Parkway along Dalgo Drive, Empalmo Court, and Alegro Drive.

[1] At the time of the issuance of the Notice of Preparation, Lot D was occupied by temporary construction trailers. These trailers were removed upon completion of construction of Inpatient Building No.1 prior to the publication of this Draft SEIR.

T:_CS\Work\Santa Clarita, City of\Henry Mayo Hospital MP Amendment_166991\Figures

Source: Google Earth, Michael Baker International, 2018.

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FIGURE 3-4
Aerial View of Surrounding Uses

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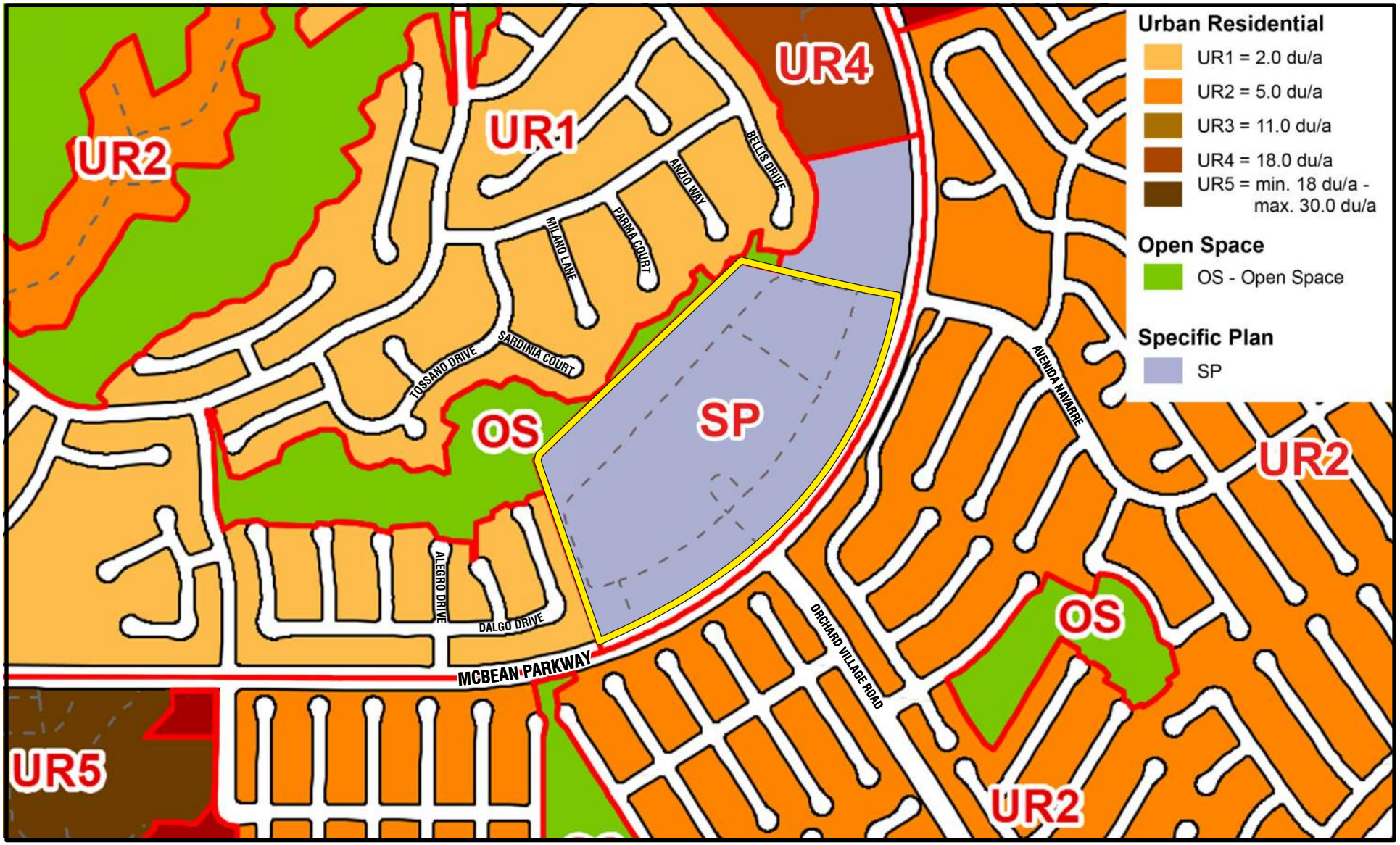

HMNH Campus Boundary

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FIGURE 3-5
Zoning Designations of the Surrounding Area

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3.4. Project Objectives

Section 15124(b) of the CEQA Guidelines states that the project description shall contain "a statement of the objectives sought by the proposed project" and that "the statement of objectives should include the underlying purpose of the project." The underlying purpose of the Proposed Project is to provide up-to-date hospital beds in the new IP-2 Building in order to comply with current and future Office of Statewide Health Planning and Development (OSHPD) codes and American with Disabilities Act (ADA) requirements; offer supporting services in a new D&T Building; and meet parking demands to provide for the present and future health care needs of the Santa Clarita Valley.

The HMNH Specific Plan and Master Plan, as amended, are intended to guide the long-term buildout of an integrated, efficient, comprehensive health care facility to help serve the growing Santa Clarita Valley by achieving the following objectives:

- Help meet the health care needs of Santa Clarita Valley's existing population and planned future population growth.
- Implement a long-term plan for expansion of the existing HMNH campus that would help meet the expected growth in demand for health care services and allow the hospital to apply for State-required approvals.
- Enhance and expand the HMNH to provide patients with personalized care, state-of-the-art medical technology, and a professional staff within a single HMNH campus environment.
- Accommodate expansion that would bring two new buildings online over time as needed while ensuring the continuance of existing operations and enabling further expansion of needed facilities.
- Maintain the viability of the hospital on a site that would continue to be centrally located within the HMNH's 680-square-mile service area as the community grows.
- Implement a well-planned HMNH Master Plan campus that is attractive and promotes quality development consistent with the visual character of the Project area.
- Establish a campus that would attract and retain physician specialists and establish Centers of Excellence, which are defined as highly specialized health care services via physician or hospital-authorized providers or hospital collaboration around a disease category.
- Develop a medical campus designed with patients in mind by linking inpatient services and medical buildings in a single setting, providing safe access and transit opportunities.
- Minimize visual impacts of the HMNH campus using enhanced building design and landscaping and focusing more intensive development near the center of the site.
- Apply land use buffering techniques between the two new buildings (including required parking) and adjacent residential uses through use of building setbacks and enhanced landscaping.

- Continue to modernize and upgrade the HMNH campus and other on-site supportive mechanical facilities to ensure the long-term viability of existing and new buildings.
- Implement an efficient vehicular and pedestrian circulation system that ensures ease of movement throughout the site.
- Ensure that future development of the HMNH campus is served by adequate on-site parking facilities to accommodate patients, visitors, and medical staff.

3.5. Project Characteristics

3.5.1. PROJECT BACKGROUND

In 2008, the City Council of the City of Santa Clarita approved a 15-year Master Plan and adopted a Development Agreement that would guide the future expansion of the campus facilities. The Master Plan and Development Agreement approved an increase in the square footage of the HMNH campus in 2008 from 340,071 square feet to 667,434 square feet, including a new inpatient hospital building, three medical office buildings, a new central plant building, and four parking structures. Since 2008, a new inpatient building (IP-1 Building), one medical office building, a new central plant building, and one parking structure have been constructed, all of which are located within the portion of the HMNH campus to the north of the main entrance at Orchard Village Road.

In 2011, the City adopted a General Plan Update, which resulted in a change in land use designation for the HMNH campus from Residential Low (RL) to Public/Institutional (PI). In 2013, the City adopted a Zoning Code Update, which rezoned the HMNH campus from RL to PI.

Also, in 2013, the California Building Standards Code (CBC) was amended to impose new mandates related to the design and construction of hospitals. Compliance with the new regulations resulted in the need to increase the square footage of the approved and since constructed IP-1 Building 1 to accommodate the new minimum width of corridors in all public and patient areas (CBC Section 1224.4.7.1), provide two separate elevators for clean items delivered and soiled items hauled (CBC Section 1224.20.2.7), and create a dedicated corridor between food storage areas and the kitchen (CBC Section 1224.20.2.1). The HMNH also sought to enlarge its Obstetrics Services Unit, consistent with the Development Agreement, to improve contract services from insurance providers and accommodate an increased demand for obstetric services. As a result of these new CBC requirements, the City determined that a Specific Plan was necessary to outline existing uses, future uses approved under the Master Plan, and proposed modifications to the Master Plan, and provide a cohesive set of standards and guidelines for how future development would occur on the campus.

In 2016, the HMNH Specific Plan was prepared and subsequently adopted by the City to codify the development parameters of the 2008 Master Plan and establish a framework for future modifications to the 2008 Master Plan. The 2016 Specific Plan allowed for the increase in hospital space on the HMNH campus (not including parking structures) from the 2008 Master Plan and Development Agreement amount of 667,434 square feet to an ultimate buildout of 698,000 square feet of space.

In all, the 2016 Specific Plan facilitated an adjustment to the approved square footage of the IP-1 Building. Specifically, the 2016 Specific Plan increased the square footage of the IP-1 Building from 116,491 square feet to 153,457 square feet (an increase of 36,966 square feet from the approved 2008 Master Plan). The 2016 Specific Plan did not result in increases in (1) the number of inpatient beds; (2)

square footage for medical office buildings; or (3) building heights that were approved under the 2008 Master Plan.

The IP-1 Building, completed in 2019, was approved in 2008 as part of the HMNH Master Plan and Development Agreement and was expanded as part of the 2016 Specific Plan. The loading dock that was under construction at the time of the 2016 Specific Plan has been completed, as well as the central plant for the IP-1 Building.

3.5.2. PROPOSED PROJECT

PROPOSED AMENDMENTS

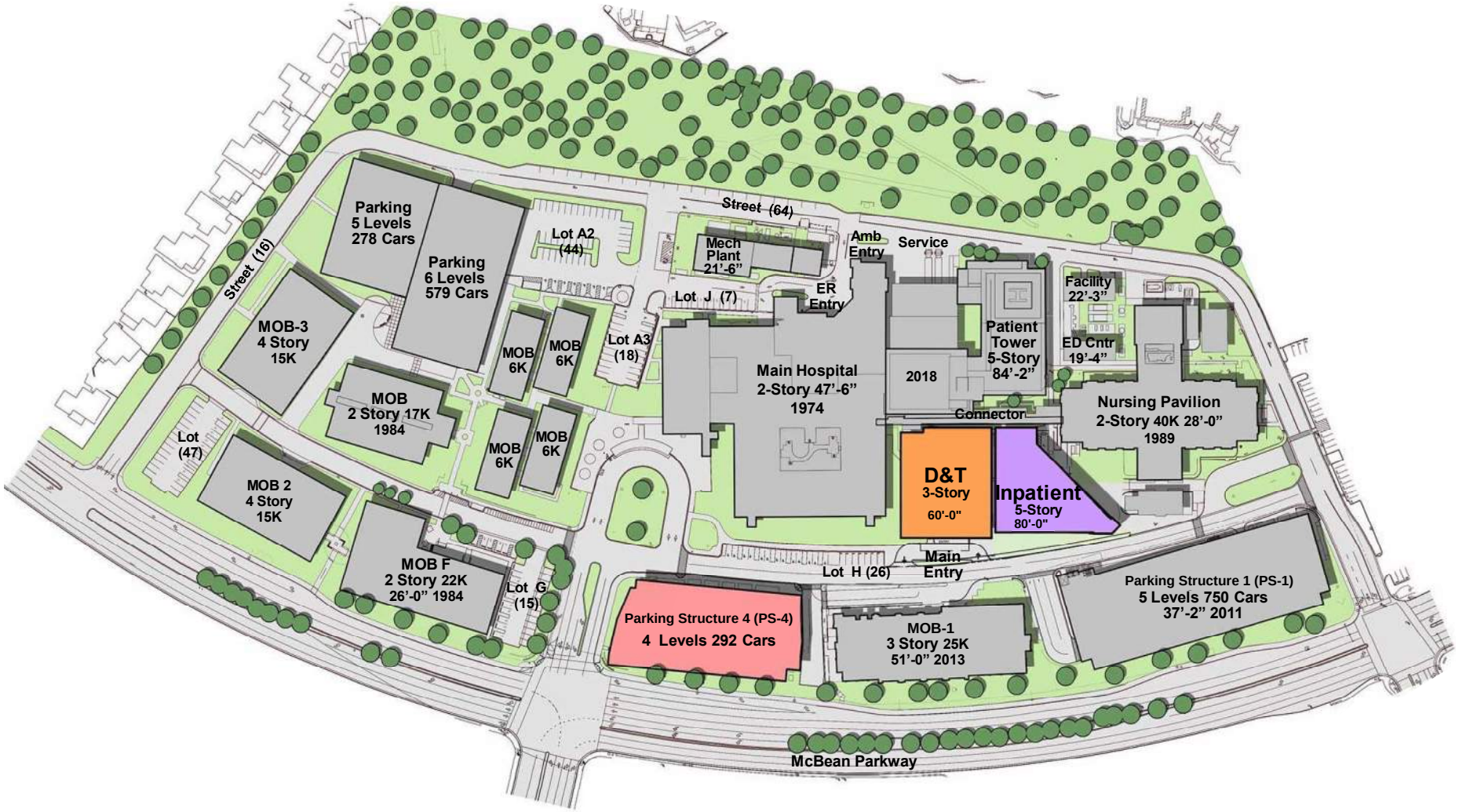
The Project involves an amendment to the approved 2016 Specific Plan and a second amendment to the 2008 Master Plan and Development Agreement to permit the development of up to 200,000 square feet of building area for a new D&T Building, a new Inpatient Building (IP-2 Building), and up to 292 new parking spaces to be added to PS-4 through the addition of three aboveground levels to the existing structure, as shown in **Figure 3-6**, Proposed Amendment to the 2008 Master Plan and 2016 Specific Plan.[2] Various modifications to the Development Agreement are proposed, including a 10-year extension to the Development Agreement.

Upgrading the beds and support services in the existing Main Hospital Building to conform to existing and future OSHPD requirements would be costlier than constructing new buildings. Accordingly, the HMNH has elected to construct a new IP-2 Building and a new D&T Building that would be developed in compliance with new CBC and OSHPD regulations. The current Main Hospital Building would subsequently be converted to office, administrative, and other support uses.

The new D&T Building would be constructed within existing Parking Lot D. This building would be three stories above grade, 60 feet in height, and contain approximately 84,300 square feet of space, including a new, below-grade basement. Accessory uses in this building could include various clinical-related uses, a pharmacy, and imaging areas. Six diesel-fueled emergency generators and four heating, ventilation, and air conditioning (HVAC) package units would be installed on the roof of this building. These pieces of equipment would be screened and located behind a parapet wall. In addition, mechanical equipment, including a natural gas-fueled steam boiler and three natural gas-fueled water heaters, would be located in the basement of this building. The Proposed Project would also involve relocation of the hospital's main entry to in front of the D&T Building, which would require removal of 16 parking spaces from Lot H.

The new IP-2 Building would be constructed within existing Parking Lots D and I immediately adjacent to the new D&T Building. The building would be five stories above grade, 80 feet in height, and contain approximately 115,700 square feet of space, including a below-grade basement. Uses in this building would include 92 inpatient beds (relocated from the existing Main Hospital Building), support services, public spaces, and additional D&T facilities. Six HVAC package units would be installed on the roof of this building. These HVAC units would be screened and located behind a parapet wall. In addition, mechanical equipment, including a natural gas-fueled steam boiler and four natural gas-fueled water heaters, would be located in the basement of this building.

[2] Upon completion of the Proposed Project, PS-4 would be three stories tall above grade with four aboveground parking levels, including parking at grade, and parking on the roof level of the parking structure.



Source: RBB Architects Inc, Henry Mayo Newhall Hospital Strategic Plan Amendment Study, December 2017.

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FIGURE 3-6

Proposed Amendment to the 2008 Master Plan and 2016 Specific Plan

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There would be no change in the maximum number of beds (i.e., 368 beds) permitted under the approved 2008 Master Plan. However, the Proposed Project would move approximately 92 beds from the existing Main Hospital Building to the new IP-2 Building. The Proposed Project would result in 360 total hospital beds on the HMNH campus (a breakdown of hospital beds by HMNH facility is displayed in **Table 3-1,** Proposed Buildout Development Program); however, the total number of hospital beds in each use may be decreased and/or increased in the future provided the total number of beds does not exceed the maximum number of beds (368) approved in the 2008 Master Plan. The area within the existing Main Hospital Building currently containing the 92 beds, as well as the D&T facilities, would be converted to office uses, other administrative uses, and/or clinical/hospital support services. More specifically, the Main Hospital Building would be backfilled with the following uses:

- Procedure rooms: 33,000 square feet
- Storage: 27,000 square feet
- Administrative office space: 53,000 square feet, some of which would be shifted from the existing MOB-1
- Imaging: 8,000 square feet
- Waiting areas: 6,000 square feet
- Magnetic Resource Imaging: 4,000 square feet
- Physical therapy/occupational therapy/speech therapy: 7,000 square feet

Other uses in the Main Hospital Building that would remain include the emergency room and remaining beds.

Table 3-1 identifies the development pre-2008 (i.e., prior to the implementation of the Master Plan), the development proposed under both the 2008 Master Plan and the 2016 Specific Plan (i.e., the first amendment to the 2008 Master Plan), and the proposed amendments to both the 2008 Master Plan and the 2016 Specific Plan.

BUILDING HEIGHT

The 2008 Master Plan established five different building height zones for the HMNH campus, as shown in **Figure 3-7**. The Project Site is located in Zone 3, which imposes a height limit of 35 feet. The IP-2 Building with a height of 80 feet, the D&T Building with a height of 60 feet, and the addition of aboveground parking levels to PS-4 with a height of 40 feet would exceed this maximum building height. A provision within the amendments to the 2008 Master Plan and 2016 Specific Plan would extend Zone 5 (an 85-foot maximum height limit) to include Lots D and I and a part of Lot H and would extend Zone 4 (a 45.5-foot maximum height limit) to include PS-4, as shown in **Figure 3-7**.

Table 3-1
Proposed Buildout Development Program

Use	Area (square feet)						Hospital Beds[a]
	Facilities Existing Prior to the 2008 Master Plan	2008 Master Plan Facilities	2016 Specific Plan Facilities	Total Existing Facilities	Proposed Amendments to the 2008 Master Plan and 2016 Specific Plan	Total Buildout Facilities	
Hospital and Related Uses							
Main Hospital Building (Built)	146,000	--	--	146,000	--	146,000	44[b]
Main Hospital Basement (Built)	5,286	--	--	5,286	--	5,286	--
Nursing Pavilion Building (Built)	63,800	--	--	63,800	--	63,800	106
Inpatient Building No. 1 (Built)[c]	--	125,363	28,094	153,457	--	153,457	118
New Inpatient Building No. 2 (Proposed)	--	--	--	--	115,700	115,700	92 existing[d]
New Diagnostic and Treatment Building (Proposed)	--	--	--	--	84,300	84,300	--
Loading Dock (Built)[c]	--	8,872[e]	--	8,872	--	8,872	--
Subtotal Hospital and Related Uses	*215,086*	*125,363*	*28,094*	*377,415*	*200,000*	*577,415*	*360*
Support Facilities							
Hospital Bridge (covered walkway) (Built)	9,122	--	--	9,122	--	9,122	--
Mechanical Plant (Built)	8,585	--	--	8,585	--	8,585	--
Facilities Building (warehouse) (Built)	2,384	--	--	2,384	--	2,384	--
Facilities Building (office) (Built)	734	--	--	734	--	734	--
Central Plant (Built)	--	10,000	-6,400	3,600	--	3,600	--
Subtotal Support Facilities	*20,825*	*10,000*	*-6,400*	*24,425*	--	*24,425*	--
Medical Office Buildings (MOB)							
MOB A (Built)	5,302	--	--	5,302	--	5,302	--
MOB B (Built)	5,302	--	--	5,302	--	5,302	--
MOB C (Built)	5,302	--	--	5,302	--	5,302	--
MOB D (Built)	5,302	--	--	5,302	--	5,302	--
MOB E (Built)	31,040	--	--	31,040	--	31,040	--
MOB F (Built)	43,912	--	--	43,912	--	43,912	--
MOB 1 (Built)	--	80,000	--	80,000	--	80,000	--
MOB 2 (Unbuilt)	--	60,000	--	--	--	60,000	--
MOB 3 (Unbuilt)	--	60,000	--	--	--	60,000	--
Foundation & Admin. Office Bldg (To Be Demolished)	8,000	-8,000	--	--	--	0	--
Subtotal Medical Office Buildings	*104,160*	*192,000*	--	*176,160*	--	*296,160*	--

Table 3-1, continued

Use	Area (square feet)						Hospital Beds[a]
	Facilities Existing Prior to the 2008 Master Plan	2008 Master Plan Facilities	2016 Specific Plan Facilities	Total Existing Facilities	Proposed Amendments to the 2008 Master Plan and 2016 Specific Plan	Total Buildout Facilities	
TOTAL	340,071	327,363	30,566	578,000	200,000	898,000	360
TOTAL HMNH CAMPUS BUILDOUT	340,071	667,434	698,000	578,000	898,000	898,000	360
SITE FLOOR AREA RATIO[f]	0.26	0.52	0.02	--	0.15	0.69	--

Notes:

[a] The total number of licensed hospital beds in each use may be decreased and/or increased at the hospital's discretion provided the total number of beds does not exceed 368. Currently, HMNH has 360 licensed hospital beds.

[b] The Main Hospital Building contains a total of 136 beds. With implementation of the Proposed Project, 44 beds would remain.

[c] The 2016 Specific Plan facilitated an adjustment to Inpatient Building No. 1 originally approved as part of the 2008 Master Plan. Specifically, the 2016 Specific Plan increased the square footage of Inpatient Building No. 1 from 125,363 square feet to 153,457 square feet (an increase of 28,094 square feet from the approved 2008 Master Plan) and relocated and expanded the Loading Dock that was approved under the 2008 Master Plan. The Loading Dock was increased by 6,500 square feet to a total of 8,872 square feet and moved from Inpatient Building No. 1 to the Infill Area, which is the area between the Main Hospital Building and Inpatient Building No. 1.

[d] These 92 beds are existing beds that would be relocated from the Main Hospital Building.

[e] The Loading Dock square footage is included in the square footage of Inpatient Building No. 1. It was part of Inpatient Building No. 1 in 2008 and later relocated to the Infill Area, which is the area between the Main Hospital Building and Inpatient Building No. 1.

[f] Floor area ratio (FAR) is the total building area divided by the total lot area. Prior to the 2008 Master Plan, the HMNH campus was a total of 30.4 acres or 1,324,224 square feet. However, the 2008 Master Plan required the dedication of 0.63 acres to the City for the McBean Parkway traffic improvements, reducing the total campus area to 29.77 acres or 1,296,781 square feet.

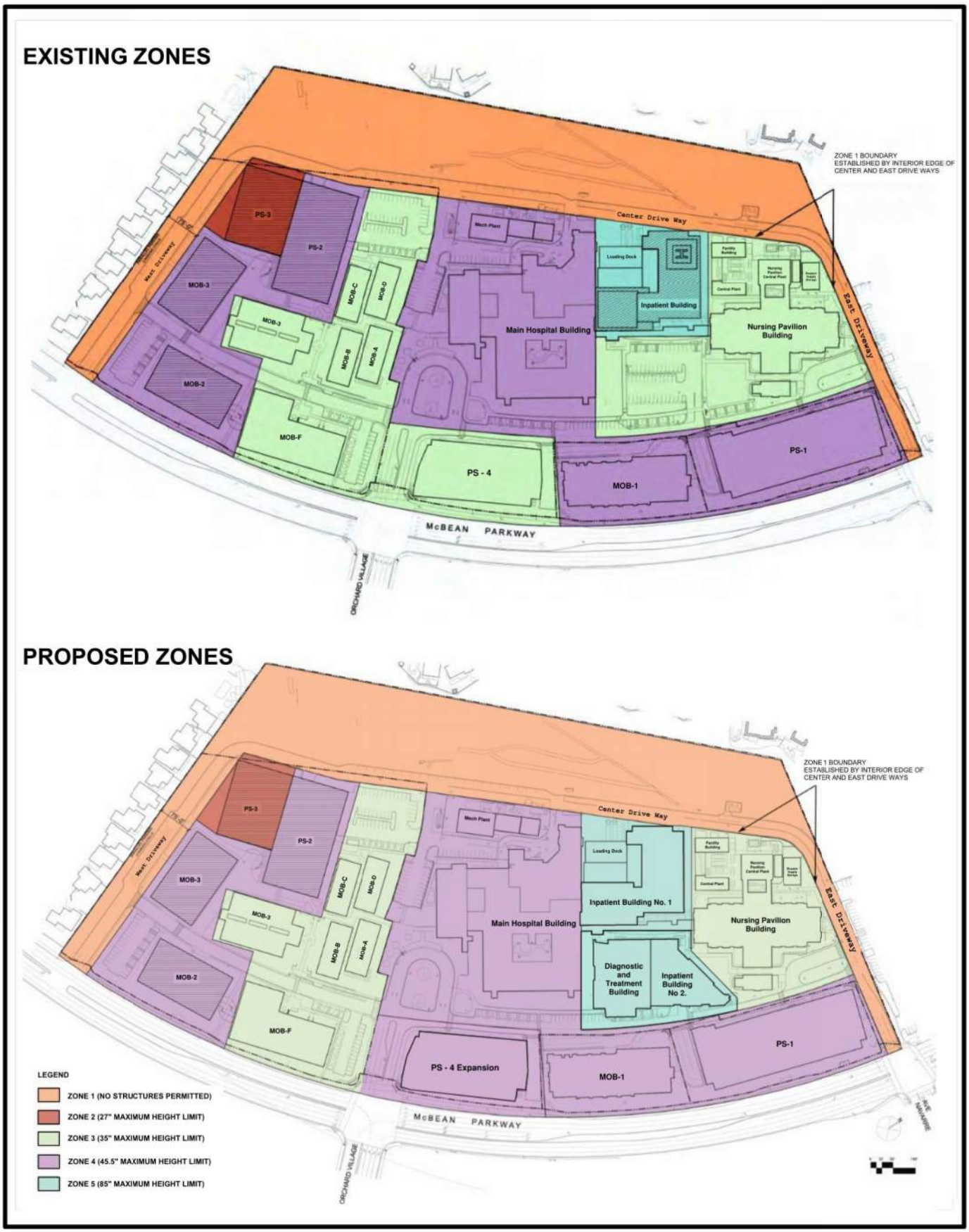

FIGURE 3-7
Building Height Zones

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SITE ACCESS

The Project would involve the relocation of the main entry/drop-off area from its present location adjacent to the existing Main Hospital Building to a new covered drop-off area in front of the proposed D&T Building. No other changes to the site access and circulation approved under the 2008 Master Plan or 2016 Specific Plan are proposed.

PARKING

The Project would include modifications to the campus parking plan under the 2008 Master Plan and Development Agreement and the 2016 Specific Plan. The Project would add 292 new parking spaces to PS-4, which is immediately north of the main entrance to the campus, through the construction of three aboveground levels on top of the existing subterranean structure/surface parking lot. The HMNH campus currently has a total approved parking supply of 2,227 spaces; however, the Proposed Project would increase the total approved supply to 2,441 spaces.[3] This increase is based on the proposed addition of 292 spaces to PS-4, as well as the proposed removal of 78 parking spaces from Lots D, H, and I. This total approved parking supply includes a total of 857 spaces in parking structures PS-2 and PS-3, which have not been constructed. As of February 2020, the HMNH campus has an observed total parking supply of 1,547 spaces. The Proposed Project would increase the existing total parking supply on the HMNH campus to 1,858 spaces.

A parking demand study completed for the Proposed Project determined that the existing peak parking demand on the campus occurs at 11am on weekdays, when approximately 1,400 parking spaces (or 91 percent of parking supply) is occupied.[4] While buildout of the Proposed Project would increase the parking supply to 1,858 spaces, the parking utilization study found that peak parking demand would also increase upon Project completion, resulting in a utilization rate of 95 percent. In general, when a location reaches 95 percent parking utilization, staff and visitors typically face difficulty finding available spaces during periods of peak demand. As a result, drivers spend additional time circling within parking lots and structures scanning for available spaces, which increases congestion and frustration of campus visitors/patients. To reduce overall parking utilization, the Project would include several transportation demand management (TDM) and paid parking strategies designed to reduce parking demand and improve wayfinding and circulation within the HMNH campus. These TDM and paid parking strategies, described below, include ride-sharing services, on-site shuttle services, a parking access and revenue control system, and dynamic wayfinding signage.

TDM strategies proposed by the Project include commute marketing and ride-match programs, which would coordinate/advertise non-single-occupancy-vehicle travel options to campus employees, patients and visitors, such as car pools and ride-hailing services like Uber and Lyft, as well as an on-site shuttle service, which would provide on-demand transportation for visitors between their parked vehicles and medical office or hospital uses on the HMNH campus. The paid parking program (referred to as the parking access and revenue control system (PARCS)) would further reduce parking demand and create revenue to fund the TDM measures and parking operation costs. The PARCS would be implemented in both surface lots and existing/proposed parking structures through installation of gates at entrances and exits to PS-1 and PS-4, as well as gateless enforcement strategies, such as personnel checking for physical permits visible in vehicle

[3] Fehr and Peers, *Parking Demand Study: Henry Mayo Newhall Hospital*, February 7, 2020.

[4] Fehr and Peers, Parking Demand Study: Henry Mayo Newhall Hospital, Table 5, February 7, 2020.

windows or virtual permits assigned to a vehicle's license plate. Paid parking on the HMNH campus may produce unintended consequences, such as incentivizing visitors to park in nearby residential areas; however, these spillover effects are not anticipated given the physical distance between these residential areas and the on-campus uses. Finally, wayfinding and signage improvements, such as digital displays showing available parking spaces in each parking structure, improve circulation within the HMNH campus by directing visitors and staff away from areas that do not have parking availability.

With implementation of the above-described TDM strategies, paid parking program, and signage improvements, parking demand on the HMNH campus would be reduced to 85 percent utilization during peak times following construction of the Proposed Project. However, ongoing monitoring of parking demand is required during each implementation phase of the HMNH Specific Plan to ensure that the above-described parking solutions are meeting the 85 percent utilization target.

SUSTAINABILITY FEATURES

The proposed new buildings would be designed and constructed to incorporate environmentally sustainable design features. Sustainability features may include energy-efficiency measures, recycling infrastructure, enhanced indoor air quality, and water conservation measures. By integrating sustainable features into the design and construction of the new buildings, the Proposed Project would reduce energy and water usage and waste generation. The Project would provide such features in compliance with code requirements, including the California Green Building Standards Code (CALGreen). In addition, the Project would be reviewed by OSHPD for compliance with their requirements.

PROJECT CONSTRUCTION AND SCHEDULE

The two new buildings would be constructed in one phase. Construction is anticipated to commence in the fourth quarter of 2021 and would occur for a duration of 21 months. This schedule is subject to change based on market conditions, permitting timelines, and demand. The estimated depth of excavation for the basement and foundations for the two new buildings would be approximately15 to 25 feet below grade. It is estimated that approximately 21,000 cubic yards of soil would be exported from the Project Site during the excavation phase.

3.6. Intended Uses of the Supplemental EIR/Discretionary Approvals and Permit

As the public agency with the principal responsibility of approving the project, the City of Santa Clarita would serve as the lead agency for the purposes of CEQA. Approvals required for implementation of the Proposed Project include, but are not limited to, the following:

- Certification of a Supplemental EIR to the 2008 Master Plan EIR;
- Amendment to the 2008 Master Plan and Development Agreement for the HMNH; and
- Amendment to the 2016 Specific Plan for the HMNH.

In addition to the specific discretionary actions listed above, other discretionary and ministerial permits and approvals may be or will be required, including, but not limited to, grading permits, excavation permits, foundation permits, and building permits.

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The following sections of the Draft SEIR contain detailed environmental analyses of the existing conditions of the Project Site and surrounding area; Project impacts, such as indirect, direct, short-term, long-term, and cumulative; and recommended mitigation measures if necessary. This Draft SEIR addresses those environmental issues identified in the Notice of Preparation (NOP), which is available, along with the NOP response letters, in **Appendix A**.

The Draft SEIR examines the following environmental issues:

- 4.1 Aesthetics
- 4.2 Air Quality
- 4.3 Energy
- 4.4 Greenhouse Gas Emissions
- 4.5 Noise
- 4.6 Transportation, Traffic, and Parking
- 4.7 Tribal Cultural Resources
- 4.8 Utilities and Service Systems

Each environmental issue is addressed in a separate section of the Draft SEIR and is organized into four sections, as follows:

Environmental Setting

The Environmental Setting subsection describes the existing and pre-Project conditions in terms of the physical environment at the time of the NOP issuance. This section also provides the background information that supports the analysis of the Project's impacts presented in the following subsections.

Regulatory Framework

The Regulatory Framework subsection explains the applicable federal, State, regional, and/or local regulations, statutes, and guiding policies that pertain to each respective environmental issue that may be applicable to the Proposed Project.

Consideration and Discussion of Environmental Impacts and Mitigation Measures

The Consideration and Discussion of Environmental Impacts and Mitigation Measures subsection provides the thresholds of significance used to assess the Project's impacts. Following the identification of the thresholds of significance is a description of the methodology, including the key assumptions, used in the analysis.

The environmental impact analysis involves the identification of the environmental changes to existing physical conditions that could occur if the Proposed Project were to be implemented, as well as the magnitude, duration, extent, frequency, and range of potential impacts, as

determined through review of factual, scientific data and consideration of all potential direct and reasonably foreseeable indirect effects of the Project.

Mitigation measures are Project-related actions taken to (1) avoid significant adverse impacts, (2) minimize a significant adverse impact, (3) rectify a significant adverse impact through restoration, (4) compensate for the impact by replacement of a substitute resource or environment; or (5) reduce or eliminate a significant adverse impact over time by preservation and maintenance operations.

The "Level of Significance after Mitigation" determination identifies impacts that would remain after the application of Project-level mitigation measures and whether the impacts are considered significant. If mitigation measures would not reduce the effects of a Project impact to less than significant, then the Project effects are considered significant and unavoidable.

Cumulative Impact Analysis

As stated in Section 15130(b) of the CEQA Guidelines, the following elements are necessary for an adequate discussion of significant cumulative impacts:

- A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or
- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide contributions to cumulative project conditions.

The cumulative context for the Proposed Project considered the related projects presented in **Table 4-1**, Major Development Projects Proposed in the City of Santa Clarita, and shown in **Figure 4-1**, Related Projects Location. The related projects listed in this table were compiled from information obtained from the City's Planning Division's web page for major development projects that are proposed, approved, or under construction in the City. As shown in **Figure 4-1**, none of the related projects are located within one mile of the Project Site.

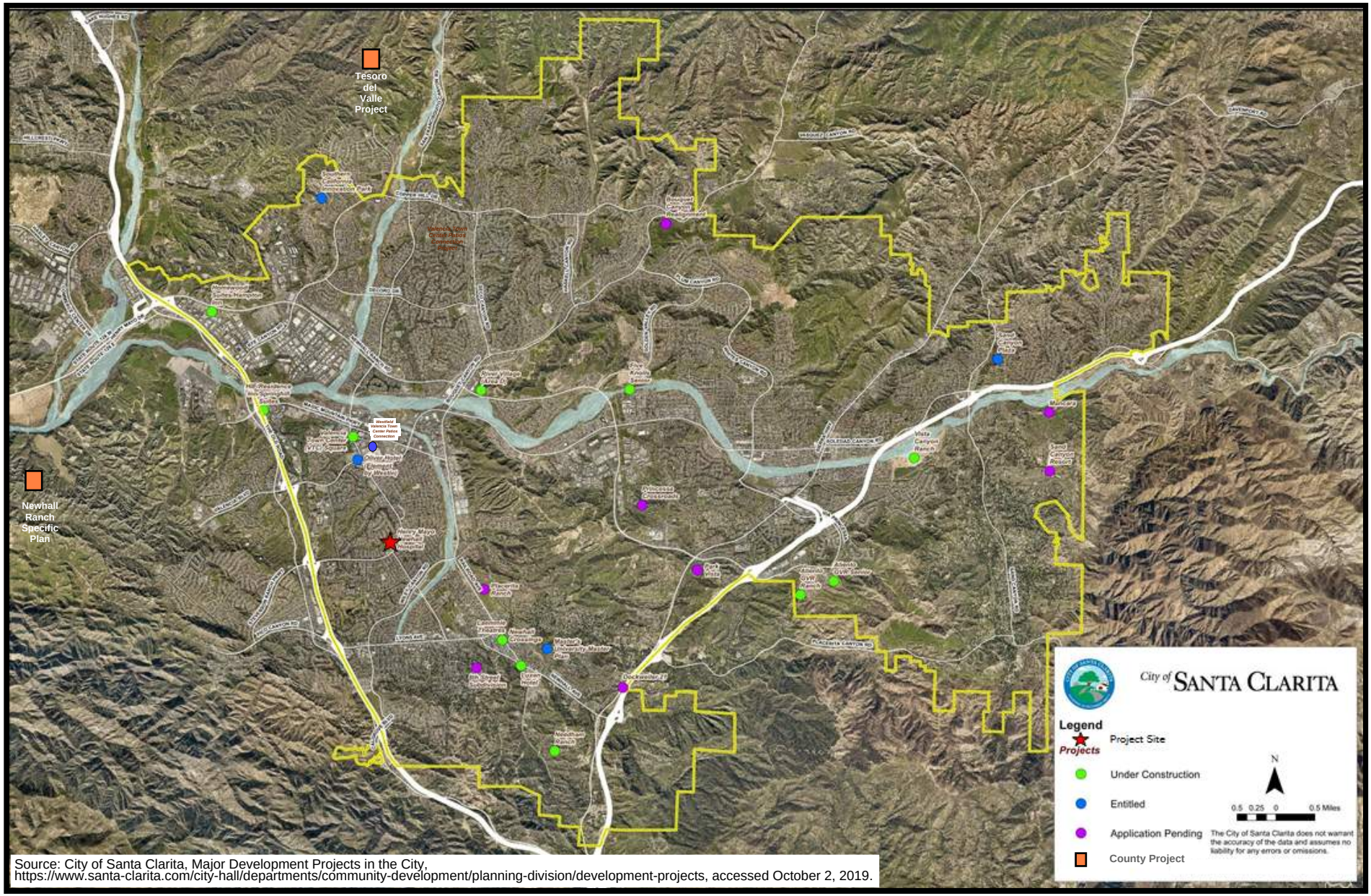
Table 4-1
Major Development Projects Proposed in the City of Santa Clarita

Project Name	Description	Status[a]
Aliento Neighborhood	400 single-family residential units, 95 age-qualified single-family residential units, two recreation centers, one trailhead park.	Under Construction
Centre at Needham Ranch Business Park	Up to 4,000,000 square foot business park – 7 buildings in Phase I.	Under Construction
Five Knolls and Galloway Senior Housing	140 age-restricted residential units, a YMCA and a senior center.	Under Construction
Homewood Suites and Hampton Inn	185 hotel rooms in two construction phases.	Under Construction
Laemmle Theatre	1,700 square feet of commercial space, a seven-screen movie theatre.	Under Construction
Luxen Hotel	42-room boutique hotel	Completed/In Operation

Table 4-1, continued

Project Name	Description	Status[a]
Newhall Crossings	20,000 square feet of retail space and 47 residential units with subterranean parking and a public plaza	Completed/In Operation
Residence Inn, Springhill Suites, and Holiday Inn Express	182-room Residence Inn/Springhill Suites and a 102-room Holiday Inn Express.	Under Construction
River Village Area D	The entire River Village Area was approved in 2005; 184 multi-family units in Area D are under construction.	Under Construction
Southern California Innovation Park	600,000 square feet of industrial space; 137,000-square-foot office building. Pending developments include 124,280 square feet of building space.	Under Construction, Proposed
Valencia Town Center Square	60 multi-family residential units and 10,000 square feet of commercial space.	Completed/In Operation
Vista Canyon Ranch	1,100 multi-family residential units and 950,000 square feet of commercial space, structured parking, Vista Canyon bridge, a new Metrolink and bus transit stations.	Under Construction
Master's University Master Plan	240,000 square feet of new college buildings, extension of Dockweiler Drive, 42 residential units, and an increase of 600 students.	Approved
Oliver Hotel (Element by Westin)	A 102,000-square-foot, 134-room hotel with a 4,000-square-foot restaurant pad.	Approved
Sand Canyon Plaza	580 residential units, , and 140,000 square feet of commercial space (including assisted living facility).	Approved
Bouquet Canyon Realignment (Proposed Project)	461 single- and multi-family residential units in 5 planning areas, with 2 parks, trails, and trailhead parking. Project includes realignment of Bouquet Canyon Road.	Proposed
Dockweiler 21	96 detached condominiums, a recreation center, and community pool.	Approved
Mancara	109 single-family detached units, trails, and an equestrian center.	Proposed
Park Vista	182 single-family detached units and a 17-acre park.	Proposed
Placerita Ranch	322 single-family detached units, trails, and 37 acres of open space.	Proposed
Princessa Crossroads	680,000 square feet of business park and retail use, 710 residential units, and an extension of Via Princessa.	Proposed
Sand Canyon Resort	Hotel and villas (totaling 384 rooms), spa, restaurants, conference space, and wedding venue.	Proposed
Westfield Valencia Town Center Patios Connection Project	153,930 square feet of new retail anchor space, including 2,600 square feet of outdoor patio space, new fueling station with up to 30 pumps, 34,185 square feet of health and fitness center, 32,000 square feet of new cinema, 7,434 square feet of new retail space, 2,138-square-foot expansion of the existing Canyon Club.	Approved
Newhall Ranch Specific Plan	Over 22,000 dwelling units on 4,835 acres, 18-hole golf course, 10 neighborhood parks and seven schools, 67 acres of commercial uses, 256 acres of business park uses, 37 acres of visitor-serving uses, 6,138 acres of open space, 6.9 million gallons per day water reclamation plant, library, and two fire stations.	Approved by Los Angeles county/Under Construction
Tesoro del Valle Project	820 homes on 1,200 acres, public facilities, dedicated open space.	Approved by Los Angeles County

[a] Proposed projects are those formally submitted to the Planning Division for review. Approved projects are those that have received planning entitlements but are not yet under construction. Under Construction projects are those that have received planning entitlements and have pulled requisite grading, building, and other applicable permits.



Source: City of Santa Clarita, Major Development Projects in the City, https://www.santa-clarita.com/city-hall/departments/community-development/planning-division/development-projects, accessed October 2, 2019.

FIGURE 4-1
Related Projects Location

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In order to set the framework for an adequate cumulative impact assessment, each impact area evaluated should have a defined, relevant geographic area of analysis and "a discrete universe of past, present, and probable future projects producing related or cumulative impacts" relevant to the impact area (CEQA Guidelines Section 15130(b)(3)). The relevant geographic area of analysis varies depending on the type of impact under consideration. For example, noise impacts associated with the Proposed Project would be temporary and limited to the Project area. If Project A, several miles away from the Project Site, is also undertaking construction activities that generate noise, the projects would likely be far enough away from one another such that noise impacts would not be additive and would not result in compounding cumulative impacts. Thus, for impacts involving effects that occur only within or close to the Project Site, the probable future projects that would be evaluated for potential impacts would be limited to those projects in the immediate Project area.

Other impact areas require larger geographic areas of analysis. For example, if Projects A, B, and C are located several miles away from the Project Site and are also within the Santa Clarita Valley Water Agency's Valencia Water Division, each project could have an individually minor impact on the capacity of existing water infrastructure; however, the projects could have a combined cumulatively considerable impact if the combined water demand is greater than the available water supplies or local infrastructure can provide. In this case, the geographic area would be the Santa Clarita Valley Water Agency service area for determining cumulative impacts on available water supply and a subset of the Valencia Water Division's service area for determining cumulative impacts on the capacity of the local water main infrastructure serving the Project.

Once the appropriate geographic area of analysis for each impact area is established, the process for determining whether a project's impacts would be cumulatively considerable is done through two steps. First, there is an assessment as to whether the combined effects from the Proposed Project and other projects could be cumulatively significant. Second, if the combined effects could be cumulatively significant, there is an assessment to determine if "the proposed project's incremental effects are cumulatively considerable" (*Communities for a Better Environment*, supra, 103 Cal.App.4th, p. 120). Therefore, the analysis would compare the incremental effect of a proposed project against the collective impacts from other projects, and also add the proposed project's incremental impact to the anticipated impacts of other projects (*Communities for a Better Environment*, supra, 103 Cal.App.4th, pp. 117-121). For example, if a lead agency determines that the Proposed Project's cumulative impacts would be significant when considering the combined impacts from Projects A, B, and C, the lead agency must then determine if the Proposed Project's incremental contribution to the combined significant, cumulative impact would be "cumulatively considerable."

Each of the environmental topics addressed in this Draft SEIR (i.e., Sections 4.1 through 4.8) contains a cumulative impacts analysis following the impacts analysis discussion.

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This section of the Draft SEIR evaluates the potential aesthetics and light and glare impacts that may result from construction and/or operation of the Proposed Project. The following discussion addresses the existing aesthetic and light and glare conditions of the affected environment, identifies and analyzes environmental impacts, and recommends mitigation measures, if necessary, to reduce or avoid adverse impacts anticipated from implementation of the Project, as applicable.

The City of Santa Clarita General Plan Conservation and Open Space Element states that "while aesthetic value is subjective, it is one of the elements that contribute to people's experience of an area. Most communities identify scenic resources as an important asset, although what is considered 'scenic' may vary according to its environmental setting."[1] The Conservation and Open Space Element further states that scenic resources "can include natural open spaces, topographic formations, and landscapes that contribute to a high level of visual quality. These are significant resources that can be maintained and enhanced to promote a positive image in the community. Many people associate natural landforms and landscapes with scenic resources, such as lakes, rivers and streams, mountain meadows, and oak woodlands. These areas, generally felt by residents to possess natural beauty, provide a positive visual experience and help to define the aesthetic character of an area. Scenic resources can also include man-made open spaces and the built environment, such as parks, trails, nature preserves, sculpture gardens, and similar features."[2]

4.1.1. ENVIRONMENTAL SETTING

SCENIC VISTAS AND RESOURCES

The Santa Clarita Valley is characterized by diverse topography, including river valleys, canyons, mountains, and ridgelines. Many of these areas within the valley have remained undeveloped because of natural barriers, such as slope constraints, resulting in a number of scenic areas. The City of Santa Clarita abuts the Angeles National Forest, which provides additional open space vistas to residents in neighborhoods in the northern and southeastern portions of the City. Angeles National Forest contains oak woodland habitat that extends into the City, which contributes to the overall rural and scenic character of the City. The City of Santa Clarita's General Plan identifies these open space areas in the Conservation and Open Space Element.[3] The Conservation and Open Space Element also identifies 11 scenic canyon areas within the City: Placerita Canyon on the southeastern side of the City; Whitney Canyon at the intersection of Sierra Highway and Newhall Avenue; Elsmere Canyon within Angeles National Forest; Bouquet Canyon in the northern portion of the City along Bouquet Canyon Road; San Francisquito Canyon, which contains the Harry Carey Historic Ranch; Sand Canyon in the eastern portion of the City; Pico Canyon in the northern portion of the Santa Clarita Woodlands Park; Towsley Canyon in the central portion of the Santa Clarita Woodlands Park; Tick Canyon in the Soledad basin; Wiley Canyon through which Interstate 5 (I-5) passes when it enters the City from the south; and Rice Canyon, which is located south of Wiley Canyon in the southwestern portion of the City.

In addition to the oak woodlands in Angeles National Forest, the Santa Clarita Valley contains other natural scenic elements, such as cottonwood-willow forested habitat along the Santa Clara

1 City of Santa Clarita, General Plan Conservation and Open Space Element, 2011, CO-52.

2 City of Santa Clarita, General Plan Conservation and Open Space Element, 2011, CO-53.

3 City of Santa Clarita, General Plan Conservation and Open Space Element, 2011, CO-7.

River and its tributaries, riparian and wetland habitat along the Santa Clara River, and a yellow sandstone, shale, and basalt formation in Agua Dulce called Vasquez Rocks, which has been the site of hundreds of film shoots and is a visual landmark in the Santa Clarita Valley.

When entering the Santa Clarita Valley, scenic vistas of undeveloped mountains, ridgelines, national forests, and wide expanses of open space can be seen from State Route (SR) 14, I-5, and SR-126. Other roads within the City limits provide scenic views of canyons and mountains surrounding the valley, such as Bouquet Canyon Road, Soledad Canyon Road, Sierra Highway, Placerita Canyon Road, and Golden Valley Road.

The Henry Mayo Newhall Hospital (HMNH) campus is not in the immediate vicinity of the above mentioned scenic vistas.

STATE SCENIC HIGHWAYS

The closest officially designated State scenic highway is part of the Angeles Crest Scenic Byway, SR-2, from near La Cañada-Flintridge north to the San Bernardino County line. This State scenic highway is approximately 25 miles from the Project Site. SR-110, Arroyo Seco Historic Parkway, between mileposts 25.7 and 31.9 in Los Angeles, is approximately 30 miles from the Project Site. Within the Santa Clarita area, Caltrans identifies I-5 as an Eligible State Scenic Highway. The designated eligible segment of I-5 extends from the I-210 interchange to the SR-126/Newhall Ranch Road interchange and is located approximately 1 mile west of the Project Site. SR-126 from I-5 to SR-150 is also designated as an Eligible State Scenic Highway and is approximately 4.3 miles northwest of the Project Site.[4] The HMNH campus is not located in an area that is within the viewshed of a State Scenic Highway or other protected visual resource.

VISUAL CHARACTER OF THE SITE AND SURROUNDING AREAS

The HMNH has been operating since 1975 and contains 432,543 square feet of building area, including 223,958 square feet of hospital and related uses (including the Main Hospital Building, Nursing Pavilion Building, and loading dock), 24,425 square feet of support facilities (including maintenance buildings, mechanical buildings, and a covered walkway), and 184,160 square feet of medical office space (including seven medical office buildings around the campus). In addition, the 153,457-square-foot Inpatient Building No. 1 (IP-1 Building) immediately to the west of Lot D has recently been completed. **Figure 4.1-1** shows Project Site conditions in 2018 when the NOP for this Draft SEIR was released and when the IP-1 Building was still under construction. As shown in **Figure 3-3**, in Section 3.0, Project Description, of this Draft SEIR, the Main Hospital Building is in the center of the HMNH campus and is connected to the Nursing Pavilion Building, located in the northeastern portion of the campus, by an enclosed bridge. Several smaller buildings flank the Nursing Pavilion Building, including the central plant, facility office, and disaster supply storage. Medical Office Building (MOB)-1, PS-1, and PS-4 are located between an internal access road and McBean Parkway (see **Figure 4.1-2**). The remaining MOBs (labeled MOB-A through MOB-F), as well as an administration building and surface parking lots, are located on the western portion of the HMNH campus. The buildings on the campus were constructed between 1975 and 2019 and use a mix of materials, such as stucco, glass, metal, and concrete, and exhibit a predominantly uniform color and design scheme. The tallest building on the HMNH campus is the IP-1 Building,

[4] Caltrans, Scenic Highways, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed September 18, 2019.

Inpatient Building No. 1 (IP-1) under construction in 2018 when the Notice of Preparation for this SEIR was released.

Landscape buffer on the southwestern edge of the HMNH campus along the internal access road

Note: Photos taken July 2018.

FIGURE 4.1-1
Views of HMNH Campus Interior

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Existing conditions at PS-1, MOB-1, and PS-4

Existing conditions at parking structure PS-4, which is the site of the proposed aboveground parking structure (looking southeast).

Note: Photos taken July 2018.

FIGURE 4.1-2
Photos of Parking Structure PS-4

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completed in 2019 immediately west of Lot D, which is five stories tall (approximately 84 feet high). MOB-1 is the next tallest existing building on the HMNH campus, other than the existing, five-level PS-1, at 37 feet high, followed by the Main Hospital Building at 47.5 feet high and MOB-F at 26 feet high.

Parking is currently provided on the HMNH campus through a mix of parking spaces in PS-1 and PS-4, surface parking lots, and parallel spaces along the internal drive aisles of the campus. Access to the HMNH campus is provided through three driveway entrances along McBean Parkway, as shown on **Figure 3-5** in Section 3.0, Project Description, of this Draft SEIR. The intersections at McBean Parkway and Orchard Village Road and McBean Parkway and Avenida Navarre are controlled by traffic signals. The third entrance and exit point, which is in the southwest corner of the HMNH campus and is unsignalized, provides right- and left-turn ingress from McBean Parkway and right-turn egress onto McBean Parkway.

The Project Site consists of Lot D, Lot I, and a portion of Lot H, where the Diagnostic and Treatment (D&T) Building and Inpatient Building No. 2 (IP-2 Building) would be located, as well as PS-4. Lot D is a surface parking lot north of the Main Hospital Building. In 2018, when the Notice of Preparation (NOP) for this SEIR was released, it was occupied by hospital-affiliated temporary office trailers and temporary construction trailers used by the contractors for the construction of the IP-1 Building.[5] As shown in **Figure 4.1-3,** Lot D has been restored as a surface parking lot now that the temporary office and construction trailers have been removed following completion of construction of the IP-1 Building. PS-4 is a three-level subterranean parking structure consisting of 352 parking spaces. The top level of this parking structure is located at-grade and is accessible from the internal access road within the HMNH campus. The top level of the structure contains overhead lights, an elevator shaft and stairs at the northwestern corner, one row of covered Americans with Disabilities Act (ADA)-compliant parking spaces on the west side, and four parking spaces on the north side with electric vehicle charging stations. Decorative landscaping, such as trees, shrubs, and groundcover, is located between McBean Parkway and PS-4, MOB-1, and PS-1 and provides some visual screening of these three structures from pedestrians and motorists along McBean Parkway and Orchard Village Road.

Residential uses are located north, northwest, and west of the HMNH campus, as well as southwest, south, southeast, and east of the campus across McBean Parkway. These homes are all single-family, detached units constructed between the late 1960s and the mid-1980s. For comparison, the HMNH hospital has been operational since 1975. These single-family homes to the north, west, and south consist of one- and two-story homes constructed with traditional ranch- and Spanish-style architectural features. Homes to the north and west are separated from the HMNH campus by a steep slope on the northwestern edge of the HMNH campus, as shown in **Figure 4.1-4**. The existing Main Hospital Building, as well as the recently completed IP-1 Building, block views of the Project Site, consisting of Lots D, I, and part of H, from this vantage point. The homeowner's association pool for the Village Homes North neighborhood to the west of the HMNH campus is immediately adjacent to the HMNH campus' northwest boundary, separated from the campus by landscaping and an approximately 6-foot-high block wall.

[5] This represents the baseline condition at the time of the issuance of the Notice of Preparation (NOP) pursuant to Section 15125(a)(1) of the CEQA Guidelines.

Conditions at Lot D and Lot H in 2018, at the time that the Notice of Preparation was issued.

Existing conditions at Lot D and Lot I (2020).

FIGURE 4.1-3
Photos of Lot D

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Steep hillside on the northwestern edge of the HMNH campus looking northwest.

Steep hillside on the northwestern edge of the HMNH campus along the internal access road.

Note: Photos taken July 2018.

FIGURE 4.1-4

Views of the Western Edge of the HMNH Campus Interior

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Two MOBs, which are associated with the University of California, Los Angeles (UCLA) health system, are situated immediately north of the HMNH campus. A senior living facility, which provides independent living, assisted living, and hospice care is located farther to the north. The Valencia United Methodist church is northeast of the campus at the northeast corner of the intersection of McBean Parkway and Avenida Navarre.

LIGHT AND GLARE

Nighttime illumination of varying intensities is a characteristic of most urban and suburban land uses, including those in Santa Clarita. New nighttime light sources have the potential to increase ambient nighttime illumination levels and result in spillover of light onto adjacent properties. These effects have the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the nighttime environment. The significance of light and glare impacts depends on the type of development surrounding the Project Site, the intensity of the light source, and the existing ambient light in the Project area. Land uses that could be sensitive to new sources of glare or nighttime light include residential uses and some commercial (e.g., hotels) and institutional uses (e.g., hospitals and schools). These uses can be considered sensitive to nighttime light sources because they can be occupied by persons with expectations of privacy during the evening hours.

The HMNH campus is surrounded by fully developed land, apart from the steep slope northwest of the HMNH campus. The existing sources of light generated from the hospital campus include street lighting, parking lot lighting, vehicle and ambulance headlights, emergency lights, lit signage, exterior building and security illumination, landscape lighting, and interior lighting passing through windows. Vehicle headlights and street and traffic lighting from McBean Parkway (a City-designated Major Highway) also contribute to light/glare on the Project Site and surrounding area, as does lighting from surrounding uses. Light and glare are generated from the residential areas on all sides of the HMNH campus and from the medical office and church uses to the north/northeast of the campus from sources such as parking lot lighting, security lighting, building and landscape accent lights, and vehicle headlights. The HMNH currently provides emergency room services. As such, surrounding neighborhoods along McBean Parkway and Orchard Village Road are exposed to ambulatory emergency lights at all hours of the day under current conditions.

EXISTING VIEWS

Views North onto the HMNH Campus

Currently, views of the HMNH campus from the single-family residential neighborhoods to the southwest, south, and southeast of the project site are partially obstructed by block walls and landscaping located between these neighborhoods and McBean Parkway. Further, mature trees and landscaping within the median and parkway within the right-of-way for McBean Parkway and on the southeast and south sides of the HMNH campus further obstruct the view of the campus from these residential properties (see **Figures 4.1-5** and **4.1-6**). As a result, views of PS-1 and MOB-1 are partially obstructed from the residential neighborhood across Via Jacara, which parallels McBean Parkway immediately to the east. Furthermore, PS-1 at the northeastern corner of the HMNH campus contains a metal wire trellis on the street-facing façade, which facilitates the growth of ivy up the exterior walls of the structure (see **Figure 4.1-6**).

Landscape buffer and block wall separating residential uses from McBean Parkway, southeast of the HMNH Campus.

Looking north onto the HMNH Campus from the southern corner of McBean Parkway and Orchard Village Road.

Note: Photos taken July 2018.

FIGURE 4.1-5

Views of the HMNH Campus from the Surrounding Area

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View of McBean Parkway landscaping from the southeastern side of McBean Parkway.

View of Parking Structure 1 (PS-1) from the southwestern corner of the McBean Parkway and Avenida Navarre intersection.

Vegetative screening on the existing HMNH parking structure (PS-1).

Note: Photos taken July 2018.

FIGURE 4.1-6
Views of the HMNH Campus Looking West

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The view of the existing MOB-F at the western corner of McBean Parkway and Orchard Village Road is partially obstructed from view of the residential neighborhood south of Orchard Village Road by mature trees and vegetation along McBean Parkway and by an ivy-covered block wall along the southern side of McBean Parkway. Homes in the residential neighborhood south of Orchard Village Road are approximately 150 to 200 feet away from the HMNH campus buildings. Motorists and pedestrians traveling on McBean Parkway have an unobstructed view of the HMNH campus entrance at the corner of McBean Parkway and Orchard Village Road and of the existing surface parking lot (PS-4) on the north side of this intersection.

Views South onto the HMNH Campus

The residential neighborhood to the northwest and north of the HMNH campus is located on a ridge, which is approximately 40 to 100 feet above the HMNH campus (see **Figure 4.1-4**). This neighborhood consists of single-family, detached homes, located south of Kirstengary Way and Arroyo Park Drive.

The neighborhood contains five cul-de-sacs that extend southward toward the blufftop above the HMNH campus: Milano Lane, Parma Court, Anzio Way, Bellis Drive, and Sardinia Court. While some of these homes overlook the HMNH campus, the views from this residential neighborhood of the HMNH campus are partially to fully obstructed by mature conifer and deciduous trees on the steep slope, which comprises the HMNH campus' northern boundary. Homes in this neighborhood have partially obstructed views of the Nursing Pavilion Building, PS-1, Main Hospital Building, and the top floors of the IP-1 Building, immediately west of Lot D. The neighborhood is approximately 400 to 600 feet from the HMNH campus buildings and is elevated between 40 and 100 feet above the internal access road within the HMNH campus.

Views East onto the HMNH Campus

Views of the HMNH campus from homes directly west (within the Village Homes North neighborhood) are partially obstructed by a block wall and a landscape buffer containing mature landscaping and trees (see **Figure 4.1-7**). Currently, surface parking is located along the majority of the western portion of the campus, along with a small, one-story administration building in the southwestern corner of the HMNH campus, which is approximately 100 feet from the nearest home in the Village Homes North neighborhood.

Views West onto the HMNH Campus

Views of the HMNH campus from homes across McBean Parkway to the east and northeast (known as the Valencia Glen neighborhood) include PS-1 on the corner of McBean Parkway and Avenida Navarre, as well as the Nursing Pavilion Building. Mature trees in the median and along the sides of McBean Parkway, as well as landscaping around the boundaries of the HMNH campus, partially obstruct views of campus buildings from this neighborhood. The existing parking structure has vegetative screening to soften the views of the structure from adjacent land uses (see **Figure 4.1-6**). These homes are approximately 350 feet from the HMNH campus buildings.

Block wall and mature landscaping on the western edge of the HMNH Campus, separating the Village Homes North residential neighborhood from the HMNH campus.

Note: Photos taken July 2018.

FIGURE 4.1-7
Views of the Residential Uses along the Southwestern Boundary of the HMNH Campus

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4.1.2. REGULATORY FRAMEWORK

FEDERAL

There are no federal regulations that apply to the Project regarding aesthetic resources.

STATE

California Scenic Highway Program

California adopted a Scenic Highway Program (Streets and Highways Code, Section 260 et seq.) in 1963 to preserve and protect scenic highway corridors from change that would diminish the visual quality of areas that are adjacent to highways. The scenic designation is based on the amount of natural landscape visible by motorists, the scenic quality of the landscape, and the extent to which development intrudes upon the motorist's enjoyment of the view. The Project Site is not within the viewshed of any State-designated Scenic Highway.

Nighttime Sky, CCR Title 24, Outdoor Lighting Standards

The California legislature passed a bill in 2001 requiring the California Energy Commission (CEC) to adopt energy efficiency standards for outdoor lighting, both public and private development. In November 2003, the CEC adopted changes to the California Code of Regulations (CCR), Title 24, Parts 1 and 6, Building Energy Efficiency Standards. These standards became effective on October 1, 2005, and included changes to the requirements for outdoor lighting for residential and nonresidential development. These standards are intended to improve the quality of outdoor lighting and to reduce the impacts of light pollution, light trespass, and glare. The standards regulate lighting characteristics, such as maximum power and brightness, shielding, and sensor controls to turn lighting on and off. Different lighting standards are set for different lighting zones (LZ), and the zone for a specific area is based on population figures from the 2000 Census. Areas can be designated LZ1 (dark), LZ2 (rural), or LZ3 (urban). Based on this classification, the Project Site is designated LZ3.

LOCAL

Santa Clarita Municipal Code (SCMC)

Section 17.51.050 Outdoor Lighting Standards

The lighting standards of the SCMC, as identified in Section 17.51.050, establishes the regulations for outdoor lighting (specifically, the standards for institutional land uses as they apply lighting restrictions for properties during hours of non-operation, security, shielding, and light trespass onto adjacent uses). These standards include regulations set forth to permit the use of outdoor lighting, minimize adverse off-site light obtrusion, and reduce light pollution to preserve the night environment. In general, the regulations require outdoor lighting to be shielded (i.e., directed downward and be of a cut-off design), designed to avoid light trespass onto neighboring properties, and operated so that lighting does not disturb neighboring uses. Further, new nonresidential buildings and building additions must have a lighting plan detailing the location, type, height, intensity, and hours of operation of outdoor lighting associated with the project. However, SCMC Section 17.51.050(C)(10) states that lighting for public and/or private facilities, such as hospitals, are exempt from the above regulations. Accordingly, the proposed buildings would be exempt from these requirements.

Section 17.51.030.C9 Landscaping and Irrigation Standards

The landscaping standards in the SCMC establish design standards for landscaping in new development, including regulations for landscape parkways within new development, landscape setbacks to screen development from public view, and specific landscape requirements for projects that include the construction of an aboveground parking structure. These parking structure landscape requirements include designing exterior elevations to minimize the use of blank concrete façades (by using textured concrete, trellises [as was used on PS-1; see **Figure 4.1-6**], or other architectural treatment), using landscape planters, and planting trees around the perimeter of the parking structure, in addition to required streetscaping or boundary landscaping.

City of Santa Clarita General Plan

Applicable goals, objectives, and policies from the City of Santa Clarita General Plan Conservation and Open Space Element are listed below.

Conservation and Open Space Element: Scenic Resources

- Goal CO 6: Preservation of scenic features that keep the Santa Clarita Valley beautiful and enhance quality of life, community identity, and property values.
  - Objective CO 6.2: Protect the scenic character of view corridors
    - Policy CO 6.2.1: Where feasible, encourage development proposals to have varied building heights to maintain view corridor sight lines.
  - Objective CO 6.6: Limit adverse impacts by humans on the scenic environment.
    - Policy CO 6.6.1: Enhance views of the night sky by reducing light pollution through use of light screens, downward directed lights, minimized reflective paving surfaces, and reduced lighting levels, as deemed appropriate by the reviewing authority.
    - Policy CO 6.6.2: Improve views of the Santa Clarita Valley through various policies to minimize air pollution and smog, as contained throughout the General Plan.
    - Policy CO 6.6.4: Where appropriate, require new development to be sensitive to scenic viewpoints or viewsheds through building design, site layout and building heights.
    - Policy CO 6.6.5: Encourage undergrounding of all new utility lines, and promote undergrounding of existing lines where feasible and practicable.

Henry Mayo Newhall Memorial Hospital Master Plan (2008) and Specific Plan (2016)

As stated in Section 3.0 of this Draft SEIR, Project Description, the Santa Clarita City Council approved a 15-year Master Plan for the HMNH campus in 2008 and adopted a Development Agreement that would guide the future expansion of the campus facilities. This Master Plan and Development Agreement approved an increase in the square footage of the HMNH campus from 340,071 square feet to 667,434 square feet, including the recently completed IP-1 Building, three medical office buildings, a recently completed central plant building, and four parking structures

(two of which have been built). In 2016, the HMNH Specific Plan was prepared and subsequently adopted by the City Council to codify the development parameters of the 2008 Master Plan and establish a framework for future modifications to the 2008 Master Plan. The 2008 Master Plan and 2016 Specific Plan established five different height limit zones to regulate development within the HMNH campus. The height limit zones range from no structure permitted to an 85-foot maximum height, as shown in **Figure 3-6** in Section 3.0 of this Draft SEIR. Zone 2 is limited to the parking structure in the far west corner of the HMNH campus and has a 27-foot building height limit. The Project Site is located within Zone 3, which contains the Nursing Pavilion Building, Central Plant, Lot D, PS-4, and MOB-A through MOB-F and has a 35-foot height limit. Zone 4, which has a height limit of 47 feet, includes MOB-1 through MOB-3, the Main Hospital Building, PS-1, and PS-2. Zone 5 only includes the IP-1 Building and has a height limit of 85 feet.

4.1.3. CONSIDERATION AND DISCUSSION OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the State CEQA Guidelines, the City of Santa Clarita has created an Initial Study Checklist tailored for evaluating the environmental impacts to resources in the Santa Clarita Valley. According to this checklist, the project would have a significant environmental impact related to aesthetics, light, and glare if it would:

Threshold (a) **Have a substantial adverse effect on a scenic vista;**

Threshold (b) **Substantially damage scenic resources, including, but not limited to, primary/secondary ridgelines, trees, rock outcroppings, and historic buildings within a state scenic highway;**

Threshold (c) **In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; or**

Threshold (d) **Create a new source of substantial light or glare which would affect day or nighttime views in an area.**

Section 7.0 of this Draft SEIR contains brief statements indicating the reasons that various possible significant effects of the Project were determined not to be significant and, therefore, were not discussed further in this Draft SEIR pursuant to Section 15128 of the CEQA Guidelines. As described in Section 7.2 of this Draft SEIR, the Proposed Project would not have significant effects relating to Threshold (a) or Threshold (b).

METHODOLOGY

For purposes of determining impact significance for projects within urbanized areas, a project is evaluated as to whether it would conflict with applicable zoning or other regulations governing "scenic quality." The term "scenic quality" is not specifically defined in the threshold language of Appendix G of the CEQA Guidelines; however, for assessment of impacts involving changes in visual character and quality, this is interpreted as pertaining to zoning standards involving building height and bulk, design character, and landscape elements; consistency with the policies of the Conservation and Open Space Element; and consistency with the scale, massing, and character of surrounding development. In addition to this consistency determination, the following analysis

of aesthetics considers the visual quality of the Project Site and the immediately surrounding area and the Project's impact on the existing aesthetic environment. Analysis is based on site visits and photographic documentation, as well as the Proposed Project's physical impacts described in the proposed site plan. The analysis takes into account the Proposed Project's design features, scale, landscaping elements, lighting, and materials. The analysis will first describe the aesthetic characteristics of the Proposed Project within the context of the HMNH campus and surrounding area, considering factors such as scale and massing, materials, setbacks, and lighting. Finally, the analysis will compare the expected appearance of the Project Site after Project implementation to the existing appearance of the Project Site and determine whether a change in the visual character of the area could occur.

For light and glare, the analysis will identify locations of off-site light- and glare-sensitive land uses and describe the existing ambient light in the vicinity of the Proposed Project. The analysis will then describe the lighting associated with the Proposed Project and evaluate whether any light will spill over onto neighboring parcels. The analysis will also evaluate the potential for sunlight to reflect off of building surfaces, causing glare, which could impact motorists along nearby roadways.

PROJECT DESIGN FEATURES

No specific project design features are proposed with regard to aesthetics, light, and glare.

PROJECT IMPACTS

Threshold (c): In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The Project Site is located in a fully urbanized area, where there is a variety of nonresidential and residential uses and extensive urban infrastructure improvements. Therefore, the following analysis determines whether the Project would conflict with applicable zoning and other regulations governing scenic quality, such as guidelines and regulations involving building height and bulk, design character, and landscape elements.

Construction Impacts

Views of the Project Site, particularly of Lot D, Lot I, and Lot H, from off-site vantage points along McBean Parkway and from neighboring residential areas are primarily obstructed by existing buildings, mature trees, landscaping, and grade differences. Construction activities associated with the Proposed Project, including truck traffic, temporary storage of construction materials on-site, and use of the construction equipment, would be temporarily viewed by motorists and pedestrians traveling along McBean Parkway and Orchard Village Road.

The 2008 HMNH Master Plan EIR provides two mitigation measures that directly address construction impacts from the development of the HMNH campus proposed in 2008. These mitigation measures, which have been adopted by the City as part of the Master Plan approval, also apply to the Proposed Project. These measures (1) address appropriate screening, such as temporary fencing, to buffer the views of construction activities, equipment, and materials from adjacent residential uses, existing hospital operations from McBean Parkway and (2) require that

construction-related security lighting be directed away from adjacent residential areas and consist of minimum wattage necessary to provide security of the construction site.

As such, short-term, construction-related impacts would be less than significant given their short duration and the adherence to the above-mentioned mitigation measures.[6]

Operational Impacts

The Proposed Project would not significantly alter the visual characteristics of the HMNH campus from the surrounding area, including from McBean Parkway, Avenida Navarre, and Orchard Village Road and the residential uses immediately to the west and northwest of the HMNH campus. The only portion of the Proposed Project that would change the appearance of the HMNH campus would be along the McBean Parkway frontage at the main entrance to the campus at Orchard Village and would be limited to the addition of three aboveground stories (four parking levels)to the existing subterranean parking structure north of the McBean Parkway and Orchard Village Road intersection (refer to **Figures 4.1-2** and **4.1-5** for existing conditions of PS-4 along the McBean Parkway frontage). The proposed addition would be screened with existing vegetation, such as ground cover, shrubs, and trees planted along the northwest side of McBean Parkway and the entrance to the campus, as well as by a proposed metal trellis on the street-facing façade of PS-4. This trellis would be similar to the trellis on the street-facing and northern façades of PS-1 and would allow vines to grow on the outside of the parking structure, creating a vegetative screen on the structure's street-facing façade. This design feature is consistent with the City's Municipal Code, which requires parking structures to minimize the use of blank concrete façades with the use of textured concrete, planters, trellises, or other architectural treatments (Municipal Code Chapter 17.51.030(c)(9)). Further, the area around the parking structure would be landscaped at the ground level to provide additional screening of the parking structure.

The proposed IP-2 Building and D&T Building would be constructed using materials, such as stucco and concrete, with metal and glass accents. These materials are consistent with the Community Character and Design Guidelines for nonresidential development in the Newhall Community. Specifically, the structures would utilize building materials of muted earth tone colors, wall articulation, roof overhangs and parapets shielding roof-mounted heating and electrical infrastructure, and landscape elements that complement the architecture.[7] Further, such materials would be consistent with other development on the HMNH campus, such as the IP-1 Building, completed in 2019, MOB-1 directly southeast of Lot D, and PS-1 directly east of Lot D. Additionally, the Project proposes to construct buildings of varying heights and would contribute to the existing variety of building heights and scales on the McBean Parkway frontage of the HMNH campus; therefore, the Project would be consistent with Policies 6.2.1 and 6.6.4 of the City's General Plan Conservation and Open Space Element, as described above.

Overall, the Project would increase building heights and massing within areas with existing height limitations under the 2016 Specific Plan and 2016 Master Plan Amendment. As stated previously, the Proposed Project would be located within height limit Zone 3, which currently limits building heights to a maximum of 35 feet. However, the Proposed Project includes an amendment to the

[6] City of Santa Clarita, Henry Mayo Newhall Memorial Hospital Master Plan Environmental Impact Report, Section 11.0, Mitigation Monitoring and Reporting Program, 2008.

[7] City of Santa Clarita, Community Character and Design Guidelines, General Design Principles, 2009, page 2-16.

2016 Specific Plan and 2016 Master Plan to designate the portion of the HMNH campus, including the proposed IP-2 Building and the D&T Building, as Zone 5, which allows building heights up to 85 feet. In addition, the amendment includes re-designating PS-4 under height limit Zone 4, which would allow building heights up to 45.5 feet. The proposed structures would not have greater massing or be greater in height than existing buildings within the HMNH campus. Specifically, the proposed IP-2 Building, which would be 80 feet in height, and the D&T Building, which would be 60 feet in height, would be shorter than the existing IP-1 Building, which is 84 feet in height, immediately west of these proposed buildings. The IP-1 Building, in addition to the existing mature conifer trees along the steep slope, would likely obstruct the view of the proposed 60-foot-tall D&T Building and the proposed 80-foot-tall IP-2 Building from the residential neighborhood to the northwest, as shown in **Figure 4.1-8**, which presents a cross-section of the Project Site looking northwest. Views of the proposed IP-2 Building and D&T Building would be obstructed from motorist and pedestrian view along McBean Parkway and Avenida Navarre by the existing 28-foot-tall Nursing Pavilion Building directly north of Lot D; the existing 37.5-foot-high PS-1 and 51-foot-high MOB-1; and by mature trees lining McBean Parkway between Avenida Navarre and PS-4. Motorists and pedestrians could view the proposed structures on Lots D, H, and I through the gap in between the existing MOB-1 and PS-1; however, these views would be fleeting and currently consist of the Main Hospital Building and the newly constructed 84-foot-high IP-1 Building. Views of the interior of the HMNH campus from pedestrians and motorists along McBean Parkway southwest of the intersection with Orchard Village Drive would be obstructed by the 26-foot-tall MOB-1 southeast of the campus entrance and by the proposed parking structure at PS-4. Therefore, the addition of the IP-2 Building and the D&T Building would be consistent with the heights of existing HMNH campus buildings and would not substantially alter the visual character of the HMNH campus or the surrounding area.

Regarding views of PS-4, the top level of the subterranean parking structure at the HMNH entrance, which is located at street level, appears as a surface parking lot with one row of covered parking spaces (see **Figure 4.1-2**). The Proposed Project would add three aboveground levels to this existing subterranean parking structure, for a total height of 40 feet. The structure would be similar in mass and scale to the 51-foot-high MOB-1 and 37.5-foot-high PS-1 located immediately northeast of MOB-1. See **Figure 4.1-9** for a view simulation of the PS-4 expansion at the HMNH campus entrance.

Given the steep slope on the northwestern edge of the campus, which serves as a visual buffer between residential areas and the HMNH campus; placement of existing buildings along the northwestern, southwestern, and western frontages of the HMNH campus, which obstruct views of the campus interior; the use of setbacks from property edges; consistency with zoning regulations and design guidelines requiring inclusion of architectural enhancements on building façades and Project Site landscaping; and existing mature vegetation along McBean Parkway, the Proposed Project would not conflict with the character and scenic quality of the area and the HMNH campus and would, therefore, have a less-than-significant impact on the visual character or quality of the area and the HMNH campus.

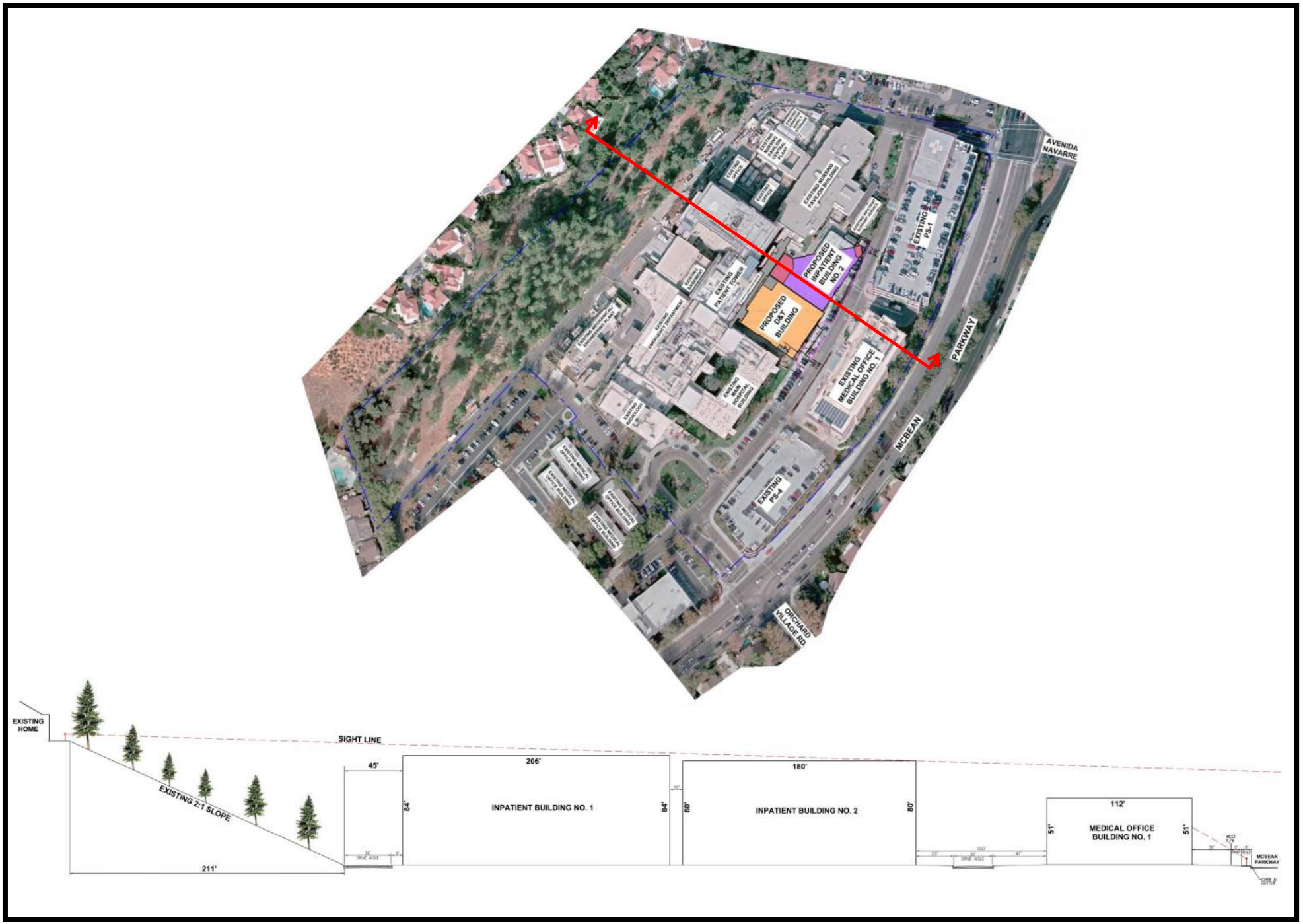

Figure 4.1-8

Project Site Cross-Section Looking Northeast

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FIGURE 4.1-9
Existing Conditions and Proposed Expansion of Parking Structure 4 (PS-4)

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Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

As stated above, the 2008 HMNH Master Plan divided the HMNH campus into five height limit zones, designed to limit the tallest buildings to the interior areas of the campus (see Figure 3-6 in Section 3.0 of this Draft SEIR). The zones identified in the 2008 HMNH Master Plan are Zone 1, where no structures are permitted; Zone 2, which has a 27-foot maximum height limit; Zone 3, which has a 35-foot maximum height limit; Zone 4, which has a 45.5-foot maximum height limit; and Zone 5, which has an 85-foot maximum height limit.[8] Because the Proposed Project would be located within Zone 3, which presently limits building heights greater than 35 feet, the Proposed Project would amend the 2008 Master Plan to re-designate the proposed IP-2 Building and D&T Building area as Zone 5, which allows building heights up to 85 feet, and to re-designate the PS-4 site as Zone 4, which allows building heights up to 45.5 feet. However, as discussed previously, the proposed structures would not have greater massing or be greater in height than existing buildings within the HMNH campus.

Further, the 2008 Master Plan EIR provided two mitigation measures to reduce construction-related aesthetic impacts, including (1) installing appropriate screening, such as temporary fencing, to buffer the views of construction activities, equipment, and materials from adjacent residential uses, existing hospital operations from McBean Parkway, and (2) requiring construction-related security lighting to be directed away from adjacent residential areas, as well as using the minimum wattage necessary to provide security of the construction site. With implementation of these mitigation measures, the 2008 Master Plan EIR found that aesthetic impacts on the visual character or quality of the site and its surroundings would be less than significant. As described above, the Proposed Project would have a less-than-significant impact on the visual character of the area and the Project Site and would, therefore, not result in any additional impacts beyond those identified in the 2008 Master Plan EIR.

Mitigation Measures

The Proposed Project has no additional impacts beyond those previously identified in the 2008 Master Plan EIR. Impacts related to scenic and visual quality would be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts related to scenic and visual quality would be less than significant without mitigation.

Threshold (d): Would the project create a new source of substantial light or glare which would affect day or nighttime views in an area.

As stated above, the HMNH campus is located in an urban area, which is fully developed apart from the steep slope northwest of the HMNH campus. The existing sources of light generated from the HMNH campus include street lighting, parking lot lighting, vehicle and ambulance headlights, emergency lights, lit signage, exterior building and security illumination, landscape lighting, and interior lighting passing through windows. Vehicle headlights and street and traffic lighting from McBean Parkway also contribute to light/glare on the Project Site and surrounding area, as does lighting from surrounding uses. Light and glare is generated from the residential areas on all sides of the HMNH campus and from the medical office and church uses to the north/northeast of the

[8] Spatial distribution of the height limit zones is displayed in the 2008 HMNH Master Plan EIR, Exhibit 5.3.10.

site from sources, such as parking lot lighting, security lighting, building and landscape accent lights, and vehicle headlights. The HMNH currently provides emergency room services. As such, surrounding neighborhoods along McBean Parkway and Orchard Village Road are exposed to ambulatory emergency lights at all hours of the day under current conditions.

Light and glare produced by the Proposed Project would be similar to the existing buildings and parking structure on the HMNH campus. Such light and glare sources include landscape lighting, overhead lights on internal campus streets, building accent lighting, overhead lighting in parking areas, and security lights. Although exempt from the City's outdoor lighting standards (SCMC Section 17.51.050, Outdoor Lighting Standards), as discussed above, the Proposed Project would direct all lights downward and to be shielded so as to avoid off-site glare. Further, lights would not be directed up, disturbing nighttime views. The proposed buildings and parking structure addition would not be constructed of glare-producing materials. As such, the Proposed Project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area and would, therefore, be consistent with Policy 6.6.1 of the City's General Plan Conservation and Open Space Element, as described above.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

The 2008 Master Plan EIR identified lighting sources on the HMNH campus as interior lighting; exterior lighting, such as lighted signs and entryways; security lighting; and lighting for the helipads. The Master Plan EIR found that residential uses to the northwest and north would not experience a substantial change in amount of light spillover or glare as this neighborhood is elevated above the campus and is buffered by mature trees. This analysis also noted that all lighting associated with buildout of the campus must comply with Chapter 17.51 (Property Development Standards) of the City's municipal code, which requires all light sources to be directed downward and shielded from streets or adjoining properties and would prevent light spillage onto adjacent residential uses. The 2008 Master Plan included additional conditions of approval, which required that: (1) the design and placement of all exterior site lighting be designed and located to avoid intrusive light and glare effects on adjacent residential properties and that light fixtures use shielding, if necessary, to prevent spill lighting on adjacent off-site uses; (2) lighting fixtures and standards shall conform to state and local safety and illumination requirements; (3) the project shall use minimally reflective glass and all other materials used on exterior buildings and structures shall be selected with attention to minimizing reflective glare; (4) automatic timers on lighting shall be designed to maximize personal safety during nighttime use while saving energy; and (5) low-intensity street lighting and low-intensity exterior lighting shall be used throughout the campus, to the extent feasible.[9] The analysis found that compliance with the Municipal Code and conditions of approval reduced all potential light and glare impacts to a less-than-significant level, and no long-term mitigation measures were required.

Mitigation Measures

Impacts to light and glare would be less than significant. Therefore, no mitigation measures are required.

[9] City of Santa Clarita, Henry Mayo Newhall Memorial Hospital Master Plan Environmental Impact Report, Section 5.3, Aesthetics, Light, and Glare, 2008.

Level of Significance After Mitigation

Impacts to light and glare would be less than significant without mitigation.

4.1.4. CUMULATIVE IMPACTS

Aesthetic impacts are localized in nature and generally would not result in a combined effect unless related projects are in the immediate vicinity of the Project Site. The Proposed Project would transform portions of the HMNH campus (specifically Lot D and PS-4) through modification of existing conditions and construction of the IP-2 Building, D&T Building, and an aboveground parking structure addition. As stated above, the Project would be visually consistent with the City of Santa Clarita Community Character and Design Guidelines with regard to landscaping, site design, building materials, and wall articulation and would be similar in mass and scale to existing structures on the HMNH campus. Therefore, as no significant aesthetics impacts have been identified for the Proposed Project, and as there are no reasonably foreseeable projects in the immediately surrounding area, no cumulative impacts associated with the Proposed Project, when combined with past, present, and future projects, related to aesthetics would occur.

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This section of the Draft SEIR analyzes the potential air quality impacts resulting from the construction and operation of the Proposed Project. The following analysis is based, in part, on the Air Quality and Greenhouse Gas Emissions Analysis and Technical Report prepared by Dudek for the Proposed Project, which examines Project impacts as they relate to construction and operational criteria air pollutant emissions, consistency with regional growth and air quality management plans, exposure of sensitive receptors to air quality impacts, Project-related emissions that may lead to other emissions (such as odors), and cumulative impacts.[1] The report is included in its entirety in **Appendix B** of this Draft SEIR.

4.2.1 ENVIRONMENTAL SETTING

The City of Santa Clarita is located within the South Coast Air Basin (Basin) and under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Basin is a 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east and includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The Basin is home to more than 42 percent of California's population and generates about 24 percent of the total state criteria pollutant emissions. Pollutant concentrations in parts of the Basin are among the highest in the nation.

The topography and climate of Southern California combine to make the Basin a high air pollution potential area. The high-pressure zone restricts the movement of cooler air, resulting in the formation of temperature inversions, and low wind speeds that hamper the dispersion of air pollutants in the Basin. The Basin is characterized as having a Mediterranean climate (typified as semi-arid with mild winters, warm summers, and moderate rainfall). The general region lies in the semi-permanent high-pressure zone of the eastern Pacific; as a result, the climate is mild and tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the Basin is a function of the area's natural physical characteristics (e.g., weather and topography) and of manufactured influences (e.g., development patterns and lifestyle). The Basin has a semi-arid climate, meaning that the air near the surface is moist because of the presence of a shallow marine layer. In Santa Clarita, the climate is characterized by relatively low rainfall, with warm summers and mild winters. Average temperatures range from a high of 94°F in August to a low of 40°F in January. Annual precipitation averages about 18.25 inches, falling mostly from November through April.[2]

The presence and intensity of sunlight are necessary prerequisites for the formation of photochemical smog. Under the influence of the ultraviolet radiation of sunlight, certain "primary" pollutants (mainly reactive hydrocarbons and oxides of nitrogen (NO_x)) react to form "secondary" pollutants (primarily oxidants). Since this process is time-dependent, secondary pollutants can be formed many miles downwind of the emission sources. Southern California also has abundant sunshine, which drives the photochemical reactions that form pollutants, such as ozone (O_3) and a substantial portion of fine particulate matter ($PM_{2.5}$).

[1] Dudek, Air Quality and Greenhouse Gas Emissions Analysis Technical Report for the Henry Mayo Newhall Hospital Expansion Project, February 2020.

[2] Western Regional Climate Center (WRCC), Newhall (046165) Monthly Climate Summary, http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca6165, accessed October 2019.

Under ideal meteorological conditions and irrespective of topography, pollutants emitted into the air mix and disperse into the upper atmosphere. However, the Southern California region frequently experiences temperature inversions in which pollutants are trapped and accumulate close to the ground. The inversion, a layer of warm, dry air overlaying cool, moist marine air, is a normal condition in coastal Southern California. The cool, damp, and hazy sea air capped by coastal clouds is heavier than the warm, clear air, which acts as a lid through which the cooler marine layer cannot rise. The height of the inversion is important in determining pollutant concentration. When the inversion is approximately 2,500 feet above mean sea level (amsl), the sea breezes carry the pollutants inland to escape over the mountain slopes or through the passes. At a height of 1,200 feet amsl, the terrain prevents the pollutants from entering the upper atmosphere, resulting in the pollutants settling in the foothill communities. Below 1,200 feet amsl, the inversion puts a tight lid on pollutants, concentrating them in a shallow layer over the entire coastal basin. Usually, inversions are lower before sunrise than during the daylight hours. Mixing heights for inversions are lower in the summer and inversions are more persistent, being partly responsible for the high levels of O_3 observed during summer months in the Basin. Smog in Southern California is generally the result of these temperature inversions combining with coastal day winds and local mountains to contain the pollutants for long periods, allowing them to form secondary pollutants by reacting in the presence of sunlight.

The City of Santa Clarita is susceptible to air inversions, which trap a layer of stagnant air near the ground where pollutants are further concentrated. These inversions produce haziness, which is caused by moisture, suspended dust, and a variety of chemical aerosols emitted by trucks, automobiles, furnaces, and other sources. Elevated particles less than 10 microns in diameter (PM_{10}) and $PM_{2.5}$ concentrations can occur in the Basin throughout the year but occur most frequently in fall and winter. Although there are some changes in emissions on a daily basis and on a seasonal basis, the observed variations in pollutant concentrations are primarily the result of seasonal differences in weather conditions.

CRITERIA AIR POLLUTANTS

Criteria pollutants are those for which the federal and State governments have established ambient air quality standards (AAQS), or criteria, for outdoor concentrations of such pollutants in order to protect public health. Criteria pollutants include O_3, nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), PM_{10}, $PM_{2.5}$, and lead. These pollutants, as well as toxic air contaminants (TACs), are discussed in the following paragraphs.[3] In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants.

Ozone

Ozone (O_3) occurs in two layers of the atmosphere. The layer surrounding the earth's surface is the troposphere. The troposphere extends approximately 10 miles above ground level, where it meets the second layer, the stratosphere. The stratospheric (the "good" ozone) layer extends upward from about 10 to 30 miles and protects life on earth from the sun's harmful ultraviolet rays (UV-B). "Bad" ozone is a photochemical pollutant and needs volatile organic compounds (VOCs),

[3] The descriptions of each of the criteria air pollutants and associated health effects are based on the U.S. Environmental Protection Agency's (USEPA) Criteria Air Pollutants and the California Air Resources Board (CARB) Glossary of Air Pollutant Terms.

nitrogen oxides (NO_X), and sunlight to form; therefore, VOCs and NO_X are O_3 precursors. VOCs and NO_X are emitted from various sources throughout the City. Significant O_3 formation generally requires an adequate amount of precursors in the atmosphere and several hours in a stable atmosphere with strong sunlight.[4]

Carbon Monoxide

Carbon monoxide (CO) is an odorless, colorless toxic gas that is emitted by mobile and stationary sources as a result of incomplete combustion of hydrocarbons or other carbon-based fuels. In cities, automobile exhaust can cause as much as 95 percent of all CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly. Therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions—primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, which is a typical situation at dusk in urban areas from November to February. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent. At high concentrations, CO can reduce the oxygen-carrying capacity of the blood and cause headaches, dizziness, and unconsciousness.[5]

Nitrogen Dioxide

Nitrogen oxides (NO_X) are a family of highly reactive gases that are a primary precursor to the formation of ground-level O_3 and react in the atmosphere to form acid rain. NO_2 (often used interchangeably with NO_X) is a reddish-brown gas that can cause breathing difficulties at high levels. Peak readings of NO_2 occur in areas that have a high concentration of combustion sources (e.g., motor vehicle engines, power plants, refineries, and other industrial operations).[6]

NO_2 can irritate and damage the lungs and lower resistance to respiratory infections, such as influenza. The health effects of short-term exposure are still unclear. However, continued or frequent exposure to NO_2 concentrations that are typically much higher than those normally found in the ambient air may increase acute respiratory illnesses in children and increase the incidence of chronic bronchitis and lung irritation. Chronic exposure to NO_2 may aggravate eyes and mucus membranes and cause pulmonary dysfunction.[7]

Sulfur Dioxide

Sulfur dioxide (SO_2) has a pungent irritating odor and is a member of a family of chemicals collectively known as sulfur oxides (SO_X). SO_X are emitted when sulfur-containing fuel is burned or during certain industrial processes. The main sources of SO_2 are coal and oil used in power plants and industries. As such, the highest levels of SO_2 are generally found near large industrial

[4] U.S. Environmental Protection Agency, *Ground-level Ozone Pollution,*https://www.epa.gov/ozone-pollution/basic-information-about-ozone#what%20where%20how, accessed October 8, 2018.

[5] U.S. Environmental Protection Agency. *Carbon Monoxide (CO) Pollution in Outdoor Air,* https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution#What%20is%20CO, accessed October 8, 2018.

[6] U.S. Environmental Protection Agency, *Nitrogen Dioxide (NO_2) Pollution,* https://www.epa.gov/no2-pollution/basic-information-about-no2#What%20is%20NO2, accessed October 8, 2018.

[7] U.S. Environmental Protection Agency, *Nitrogen Dioxide (NO_2) Pollution*. https://www.epa.gov/no2-pollution/basic-information-about-no2#What%20is%20NO2, accessed October 8, 2018.

complexes. SO_2 is the most prevalent form of SO_X in the atmosphere and is used as an indicator for the group of gaseous SO_X. SO_X contributes to soil and surface water acidification and acid rain, which cause a variety of harmful effects to aquatic and terrestrial ecosystems.[8]

Coarse and Fine Particulate Matter (PM10 and PM2.5)

Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. $PM_{2.5}$ and PM_{10} represent fractions of particulate matter. Coarse particulate matter (PM_{10}) refers to suspended particulate matter, which is smaller than 10 microns or approximately 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. PM_{10} scatters light and significantly reduces visibility. In addition, these particulates penetrate the lungs and can potentially damage the respiratory tract.[9]

Fine particulate matter ($PM_{2.5}$) consists of particulate matter that is 2.5 microns or less in diameter and is roughly 1/28 the diameter of a human hair. $PM_{2.5}$ results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases, such as sulfur oxides (SO_x), NO_x, and VOCs. Particulate matter impacts primarily affect infants, children, the elderly, and those with preexisting cardiopulmonary disease.[10] When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract.

In general, $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates, can cause lung damage directly or be absorbed into the blood stream, causing damage elsewhere in the body. Additionally, these substances can transport adsorbed gases, such as chlorides or ammonium, into the lungs, also causing injury. People with influenza, people with chronic respiratory and cardiovascular diseases, and the elderly may suffer worsening illness and premature death as a result of breathing particulate matter. People with bronchitis can expect aggravated symptoms from breathing in particulate matter.

Lead

Lead is a soft and chemically resistant metal that can accumulate in the body, especially in the bones, and can result in a variety of adverse health effects. In the past, motor vehicle exhaust was the major source of lead emissions to the air. Since lead has been removed from gasoline (in the late 1970s and early 1980s), air emissions of lead from the transportation sector have greatly declined. However, because it was emitted in large amounts from vehicles in the past, lead is

[8] U.S. Environmental Protection Agency, *Sulfur Dioxide (SO_2) Pollution,* https://www.epa.gov/so2-pollution/sulfur-dioxide-basics, accessed October 8, 2018.

[9] Air Now, *Particle Pollution (PM),* https://cfpub.epa.gov/airnow/index.cfm?action=aqibasics.particle, accessed September 7, 2018.

[10] Air Now, *Particle Pollution (PM),* https://cfpub.epa.gov/airnow/index.cfm?action=aqibasics.particle, accessed September 7, 2018.

present in many soils (especially urban soils) and can get resuspended into the air. The major sources of lead emissions today are ore and metals processing, particularly lead smelters. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers.[11]

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth. Children are highly susceptible to the effects of lead.

Volatile Organic Compounds (VOCs)

Hydrocarbons are organic gases that are formed from hydrogen and carbon and sometimes other elements. Hydrocarbons that contribute to formation of O_3 are referred to and regulated as VOCs (also referred to as reactive organic gases). Combustion engine exhaust, oil refineries, and fossil-fueled power plants are the sources of hydrocarbons. Other sources of hydrocarbons include evaporation from petroleum fuels, solvents, dry cleaning solutions, and paint.

The primary health effects of VOCs result from the formation of O_3 and its related health effects. High levels of VOCs in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement. Carcinogenic forms of hydrocarbons, such as benzene, are considered TACs. There are no separate health standards for VOCs as a group.

NON-CRITERIA AIR POLLUTANTS

Toxic Air Contaminants

A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic non-cancer health effects. A toxic substance released into the air is considered a TAC. TACs are identified by federal and State agencies based on a review of available scientific evidence. In the State of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air. Assembly Bill (AB) 2588 requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions sources, identification of resulting hotspots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over five years.

Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources, such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources, such as automobiles; and area sources, such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic

[11] U.S. Environmental Protection Agency, *Lead,* https://www.epa.gov/lead/learn-about-lead, accessed September 7, 2018.

effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

Diesel Particulate Matter

Diesel particulate matter (DPM) is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. More than 90 percent of DPM is less than 1 micrometer in diameter (about 1/70 the diameter of a human hair) and, thus, is a subset of $PM_{2.5}$.[12] DPM is typically composed of carbon particles (soot, also called black carbon) and numerous organic compounds, including over 40 known cancer-causing organic substances. DPM is emitted from a broad range of diesel engines: on-road diesel engines of trucks, buses, and cars and off-road diesel engines, including locomotives, marine vessels, and heavy-duty construction equipment. Approximately 70 percent of all airborne cancer risk in California is associated with DPM.[13] Because it is part of $PM_{2.5}$, DPM also contributes to the same non-cancer health effects as $PM_{2.5}$ exposure. These effects include premature death; hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma; increased respiratory symptoms; and decreased lung function in children.

Odorous Compounds

The occurrence and severity of potential odor impacts depends on numerous factors, such as the nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location. Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The ability to detect odors varies considerably among the population and overall is quite subjective. People may have different reactions to the same odor. An odor that is offensive to one person may be perfectly acceptable to another (e.g., coffee roaster). An unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.[14]

AMBIENT AIR QUALITY STANDARDS

Both California and the federal government have established health-based AAQS for the pollutants shown in **Table 4.2-1**. These pollutants are O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead. In addition, the State has set standards for sulfates, visibility-reducing particles, hydrogen sulfide, and vinyl chloride.

[12] California Air Resources Board, California Ambient Air Quality Standards, 2017.

[13] California Air Resources Board, Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles, 2000.

[14] South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993.

Table 4.2-1
Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard	Federal Primary Standard	Major Pollutant Source
Ozone (O_3)	1 hour	0.09 ppm	N/A	Motor vehicles, paints, coatings, and solvents.
	8 hour	0.07 ppm	0.075 ppm	
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hour	9.0 ppm	9.0 ppm	
Nitrogen Dioxide (NO_2)	Annual Average	0.03 ppm	0.053 ppm	Motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.18 ppm	0.100 ppm	
Sulfur Dioxide (SO_2)	1 hour	0.25 ppm	0.075 ppm	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	24 hour	0.04 ppm	N/A	
Respirable Particulate Matter (PM_{10})	Annual Arithmetic Mean	20 µg/m³	N/A	Dust and fume-producing construction, industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind raised dust and ocean sprays).
	24 hour	50 µg/m³	150 µg/m³	
Respirable Particulate Matter ($PM_{2.5}$)	Annual Arithmetic Mean	12 µg/m³	12 µg/m³	Dust and fume-producing construction, industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind raised dust and ocean sprays).
	24 hour	N/A	35 µg/m³	
Lead (Pb)	30-Day Average	1.5 µg/m³	N/A	Present source: lead smelters, battery manufacturing and recycling facilities. Past source: combustion of leaded gasoline.
	Calendar Quarterly	N/A	1.5 µg/m³	
	3-Month Average	N/A	0.15 µg/m³	
Sulfates (SO_4)	24 hour	25 µg/m³	N/A	Industrial processes.
Visibility Reducing Particles	8 hour	ExCo=0.23/km visibility of 10≥ miles	N/A	Suspended particulate matter, which is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid.
Hydrogen Sulfide (H_2S)	1 hour	0.03 ppm	N/A	Formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas.
Vinyl Chloride	24 hour	0.01 ppm	N/A	Used to make polyvinyl chloride (PVC) plastic and vinyl products.

Source: CARB, California Ambient Air Quality Standards, August 2017.
Notes: ppm = parts per million; µg/m³ = micrograms per cubic meter; N/A = Not Applicable (standard has not been established for this pollutant/duration by CARB or USEPA)

Regional Air Quality

The California Air Resources Board (CARB) designates all areas within the State as either attainment (having air quality better than the California Ambient Air Quality Standards (CAAQS)) or nonattainment (having a pollution concentration that exceeds the CAAQS more than once in three years). Likewise, the U.S. Environmental Protection Agency (USEPA) designates all areas of the U.S. as either being in attainment of the National Ambient Air Quality Standards (NAAQS) or non-attainment if pollution concentrations exceed the NAAQS. Because attainment/non-

attainment is pollutant-specific, an area may be classified as nonattainment for one pollutant and attainment for another. Some areas are unclassified, which means no monitoring data are available. Unclassified areas are considered to be in attainment.[15] Attainment status for the Basin is shown in **Table 4.2-2**.

Table 4.2-2
Attainment Status of Pollutants in South Coast Air Basin

Pollutant	Averaging Time	State	Federal
Ozone (O_3)	1 hour	**Non-attainment**	N/A
	8 hour	**Non-attainment**	**Extreme Non-attainment**
Carbon Monoxide (CO)	1 hour	Attainment	Serious/Maintenance
	8 hour	Attainment	Serious/Maintenance
Nitrogen Dioxide (NO_2)	Annual Average	Attainment	Attainment/Maintenance
	1 hour	Unclassified	Unclassified
Sulfur Dioxide (SO_2)	1 hour	Attainment	Unclassified
	24 hour	Attainment	Unclassified
Respirable Particulate Matter (PM10)	Annual Arithmetic Mean	**Non-attainment**	N/A
	24 hour	**Non-attainment**	Serious/Maintenance
Respirable Particulate Matter (PM2.5)	Annual Arithmetic Mean	**Non-attainment**	**Moderate Non-attainment**
	24 hour	N/A	**Serious Non-attainment**
Lead (Pb)	30-Day Average	Attainment	N/A
	Calendar Quarterly	N/A	Unclassified/Attainment
	Rolling 3-Month Average	N/A	**Non-attainment**
Sulfates (SO_4)	24 hour	Attainment	N/A
Visibility Reducing Particles	8 hour	Unclassified	N/A
Hydrogen Sulfide (H_2S)	1 hour	Attainment	N/A
Vinyl Chloride	24 hour	Attainment	N/A

Source: CARB, Air Quality Standards and Area Designations, 2018; U.S. Environmental Protection Agency, Nonattainment Areas for Criteria Pollutants (Green Book), 2018; SCAQMD, Final 2016 Air Quality Management Plan, March 2017.
Note: N/A = Not Applicable

In summary, the Basin is designated as a non-attainment area for federal and State O_3 and $PM_{2.5}$ standards, as well as State PM_{10} standards; however, it is designated as an attainment area for federal PM_{10} standards. The Basin is designated as an attainment area for federal and State CO, NO_2, and SO_2 standards. While the Basin has been designated as non-attainment for the federal rolling 3-month average lead standard, it is designated attainment for the State lead standard.[16]

Despite the current non-attainment status, air quality within the Basin has generally improved since the inception of air pollutant monitoring in 1976. This improvement is mainly due to lower-polluting on-road motor vehicles, more stringent regulation of industrial sources, and the implementation of emission reduction strategies by the SCAQMD. This trend toward cleaner air has occurred in spite of continued population growth, primarily due to the impacts of the region's air quality control program. PM_{10} levels have declined almost 50 percent since 1990, and $PM_{2.5}$ levels have also

[15] California Air Resources Board, California Ambient Air Quality Standards, 2017.
[16] South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan,* 2017.

declined 50 percent since measurements began in 1999.[17] Similar improvements are observed with O_3, although the rate of O_3 decline has slowed in recent years.

Local Air Quality

CARB and regional air quality management or pollution control districts monitor ambient air quality at approximately 250 air quality monitoring stations across the State. The SCAQMD monitors local ambient air quality in the Basin. Air quality monitoring stations usually measure pollutant concentrations 10 feet above ground level; therefore, air quality is often referred to in terms of ground-level concentrations. The most recent background ambient air quality data from 2015 to 2017 are presented in **Table 4.2-3**. The Santa Clarita monitoring station, located at 22224 Placerita Canyon Road, is the nearest air quality monitoring station to the Project Site, approximately 2 miles south. The data collected at this station are considered representative of the air quality experienced in the Project vicinity. Air quality data for O_3, NO_2, CO, SO_2, PM_{10}, and $PM_{2.5}$ from the Santa Clarita monitoring station are provided in **Table 4.2-3**. Because SO_2 measurements are not monitored at the Santa Clarita monitoring station, SO_2 measurements were taken from the Main Street monitoring station (1630 N. Main Street near downtown Los Angeles, approximately 30 miles south of the Project Site). The number of days exceeding the AAQS is also shown in **Table 4.2-3.**

Sensitive Receptors

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. Facilities and structures where these air pollution-sensitive people live or spend considerable amounts of time are known as sensitive receptors. Land uses where air pollution-sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses).[18] The SCAQMD identifies sensitive receptors as residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes.[19] Residential land uses are located to the north, east, and west of the HMNH campus. The closest sensitive receptors to the Project Site would be patients at the IP-1 Building, approximately 20 feet west of Lot D, the Main Hospital Building, approximately 60 feet to the west of Lot D, and the Cardiac Rehabilitation Center, approximately 50 feet to the north of Lot D. The closest off-site sensitive receptors to the Project Site include residences located approximately 150 feet south of PS-4.

[17] South Coast Air Quality Management District, *Final 2012 Air Quality Management Plan,* 2013.

[18] California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective, 2005.

[19] South Coast Air Quality Management District, *CEQA Air Quality Handbook,* 1993.

Table 4.2-3
Local Ambient Air Quality Data

Monitoring Station	Unit	Averaging Time	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
					2015	2016	2017	2015	2016	2017
Ozone (O_3)										
Santa Clarita	ppm	Maximum 1-hour concentration	State	0.09	0.126	0.130	0.151	23	29	45
	ppm	Maximum 8-hour concentration	State	0.070	0.109	0.116	0.129	55	59	76
			Federal	0.070	0.108	0.115	0.128	52	57	73
Nitrogen Dioxide (NO_2)										
Santa Clarita	ppm	Maximum 1-hour concentration	State	0.18	0.064	0.046	0.057	0	0	0
			Federal	0.100	0.065	0.046	0.058	0	0	0
	ppm	Annual concentration	State	0.030	0.011	0.011	0.010	0	0	0
			Federal	0.053	0.012	0.010	0.010	0	0	0
Carbon Monoxide (CO)										
Santa Clarita	ppm	Maximum 1-hour concentration	State	20	–	–	–	–	–	–
			Federal	35	1.2	1.3	1.3	0	0	0
	ppm	Maximum 8-hour concentration	State	9.0	ND	ND	–	0	0	–
			Federal	9	0.9	1.1	0.8	0	0	0
Sulfur Dioxide (SO_2)										
Main Street	ppm	Maximum 1-hour concentration	Federal	0.075	0.13	0.013	0.006	0	0	0
	ppm	Max. 24-hour concentration	Federal	0.14	0.011	0.013	0.015	0	0	0
	ppm	Annual concentration	Federal	0.030	0.001a	0.003	0.004	0	0	0
Coarse Particulate Matter (PM_{10})[b]										
Santa Clarita	µg/m³	Max. 24-hour concentration	State	50	39.0	96.1	66.5	0.0 (0)	6 (1)	ND (2)
			Federal	150	41.0	96.0	66.5	0.0 (0)	0.0 (0)	ND (0)
	µg/m³	Annual concentration	State	20	ND	23.6	ND	–	–	–
Fine Particulate Matter ($PM_{2.5}$)[b]										
Santa Clarita	µg/m³	Max. 24-hour concentration	State	35	34.4	33.9	32.6	ND	ND	ND
	µg/m³	Annual concentration	State	12	10	9	10	–	–	–
			Federal	12.0	ND	ND	ND	–	–	–

Source: CARB, Ambient Air Quality Standards, May 4, 2016, http://www.arb.ca.gov/research/aaqs/aaqs2.pdf, accessed August 2017; USEPA, Criteria Air Pollutants, July 21, 2016, https://www.epa.gov/criteria-air-pollutants, accessed August 2017.

Notes: – = not available; µg/m³ = micrograms per cubic meter; ND = insufficient data available to determine the value; and ppm = parts per million.

Data taken from CARB iADAM (http://www.arb.ca.gov/adam) and USEPA AirData (http://www.epa.gov/airdata/) represent the highest concentrations experienced over a given year.

Table 4.2-3 Notes, continued:

Exceedances of federal and State standards are only shown for O_3 and particulate matter. Daily exceedances for particulate matter are estimated days because PM_{10} and $PM_{2.5}$ are not monitored daily. All other criteria pollutants did not exceed federal or State standards during the years shown. There is no federal standard for 1-hour ozone, annual PM_{10}, or 24-hour SO_2 or a State 24-hour standard for $PM_{2.5}$.

The Santa Clarita Monitoring Station is located at 22224 Placerita Canyon Road in Santa Clarita. The Main Street Monitoring Station is located at 1630 N. Main Street near downtown Los Angeles.

[a] Mean does not satisfy minimum data completeness criteria.

[b] Measurements of PM10 and PM2.5 are usually collected every 6 days and every 1 to 3 days, respectively. Number of days exceeding the standards is a mathematical estimate of the number of days that concentrations would have been greater than the level of the standard had each day been monitored. The numbers in parentheses are the measured number of samples that exceeded the standard.

4.2.2 REGULATORY FRAMEWORK

FEDERAL

U.S. Environmental Protection Agency and National Ambient Air Quality Standards (NAAQS)

The USEPA is responsible for setting the NAAQS for atmospheric pollutants and regulates emission sources under the authority of the federal government, such as aircraft, ships, and some locomotives, as well as emission sources outside of State waters. The USEPA requires states with non-attainment areas to submit a State Implementation Plan (SIP) identifying how the State will attain or maintain the primary and secondary NAAQS, which are set forth in the Clean Air Act. The State of California first adopted the CAAQS in 1969, predating the first NAAQS in 1971. While California law continues to mandate CAAQS, attainment of the NAAQS has precedence over attainment of the CAAQS due to penalties for failure to meet federal attainment deadlines.[20]

STATE

California Clean Air Act

The California Clean Air Act, which was approved in 1988, requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with CAAQS. The act also requires that by the end of 1994 and once every three years thereafter, the air districts are to assess their progress toward attaining the air quality standards. The triennial assessment is to report the extent of air quality improvement and the amounts of emission reductions achieved from control measures for the preceding three-year period. The AQMPs also serve as the basis for preparation of the State Implementation Plan for the State of California. As with the USEPA, CARB also designates areas within California as either attainment or non-attainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the California Clean Air Act, areas are designated as non-attainment for a pollutant if air quality data show that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as non-attainment.

Assembly Bill 1807

The State Air Toxics Program was established in 1983 under AB 1807 (Tanner). The California TAC list identifies more than 700 pollutants, of which carcinogenic and noncarcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. TAC emissions from individual facilities are quantified and prioritized. "High-priority" facilities are required to perform a health risk assessment, and if specific thresholds are exceeded, the

[20] California Air Resources Board, California Ambient Air Quality Standards, 2017.

facility operator is required to communicate the results to the public in the form of notices and public meetings. In 2000, CARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines.[21] The regulation is anticipated to result in an 80 percent decrease in statewide diesel health risk in 2020 compared with the diesel risk in 2000. Additional regulations apply to new trucks and diesel fuel, including the On-Road Heavy Duty Diesel Vehicle (In-Use) Regulation, the On-Road Heavy Duty (New) Vehicle Program, the In-Use Off-Road Diesel Vehicle Regulation, and the New Off-Road Compression-Ignition (Diesel) Engines and Equipment program.

Fleet owners of mobile construction equipment are subject to the CARB Regulation for In-Use Off-Road Diesel Vehicles (Title 13 California Code of Regulations (CCR), Chapter 9, Section 2449), the purpose of which is to reduce DPM and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles.

All commercial diesel vehicles are subject to Title 13 CCR Section 2485, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to 5 minutes; electric auxiliary power units should be used whenever possible.

California Health and Safety Code Section 41700

Section 41700 of the Health and Safety Code states that a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or that endanger the comfort, repose, health, or safety of any of those persons or the public; or that cause, or have a natural tendency to cause, injury or damage to business or property. This section also applies to sources of objectionable odors. Projects required to obtain permits from the SCAQMD are evaluated by SCAQMD staff for potential odor nuisance, and conditions may be applied (or control equipment required) where necessary to prevent occurrence of public nuisance.

LOCAL

2016 Air Quality Management Plan

The 2016 AQMP, which was adopted in March 2017 by the SCAQMD, proposes policies and measures to achieve federal and State standards for improved air quality in the Basin and those portions of the Salton Sea Air Basin that are under the SCAQMD's jurisdiction.[22] The AQMP relies on a regional and multi-level partnership of governmental agencies at the federal, State, regional, and local level. These agencies (USEPA, CARB, local governments, Southern California Association of Governments [SCAG], and SCAQMD) are the primary agencies that implement the AQMP programs. The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS) from SCAG, updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts.[23]

[21] California Air Resources Board, Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles, 2000.

[22] South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan,* 2017.

[23] Southern California Association of Governments, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016.

The 2016 AQMP addresses several State and federal planning requirements, incorporating new scientific information, primarily in the form of updated emissions inventories, ambient measurements, and new meteorological air quality models. The 2016 AQMP highlights the reductions and the interagency planning necessary to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria pollutant standards within the time frames allowed under federal Clean Air Act. The primary task of the 2016 AQMP is to bring the Basin into attainment with federal health-based standards for ozone, PM_{10}, and $PM_{2.5}$.[24]

SCAQMD Rules and Regulations

All projects located within the Basin are subject to SCAQMD rules and regulations in effect at the time of construction. Specific rules that may be applicable to the Project include the following:

Rule 401 Visible Emissions

A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the U.S. Bureau of Mines, or of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described herein.

Rule 402 Nuisance

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause injury or damage to business or property.

Rule 403 Fugitive Dust

A person shall not cause or allow the emissions of fugitive dust from any active operation, open storage pile, or disturbed surface area such that: A) the dust remains visible in the atmosphere beyond the property line of the emission source; or B) the dust exceeds 20 percent opacity, if the dust emission is the result of movement of a motorized vehicle. Rule 403 also prohibits active operations without the use of available dust control measures, such as gravel pads at ingress and egress points and wheel shaking and washing to remove bulk materials from vehicles accessing the Project Site. The rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of man-made fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions. Rule 403 applies to any activity or man-made condition capable of generating fugitive dust.

Rule 1110.2 Emissions from Gaseous- and Liquid-Filled Engines

A person shall not operate stationary and portable engines rated at greater than 50 horsepower in a manner that exceeds emission concentration limits established by the SCAQMD for NO_x, VOC, and CO. The purpose of Rule 1110.2 is to reduce NO_x, VOCs, and CO emissions from engines. Emergency engines, including those powering standby generators, are generally exempt from the

[24] South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan,* 2017.

emissions and monitoring requirements of this rule because they have permit conditions that limit operation to 200 hours or less per year.

Rule 1113 Architectural Coatings

A person shall not apply or solicit the application of any architectural coating within SCAQMD with VOC content in excess of the values specified in a table incorporated in this rule.

Rule 1146.2 Emissions of NOx from Large Water Heaters, Small Boilers, and Process Heaters

A person shall not operate any unit(s) that results in NO_x emissions greater than the limits established by the SCAQMD in a table incorporated in this rule. Further, no person shall operate any unit(s) with a rated heat input capacity greater than or equal to 5 million British thermal units (Btu) per hour if the unit(s) discharge CO emissions in excess of 400 parts per million into the atmosphere. The purpose of this rule is to reduce the NO_x emissions from natural gas-fired water heaters, boilers, and process heaters.

Rule 1303 Requirements for State Ambient Air Quality Standards

A person shall employ Best Available Control Technology (BACT) for a new or relocated source or for the modification of an existing source which would result in an emission increase of any non-attainment air contaminant, any ozone depleting compound, or ammonia.

In addition to the rules listed above, SCAQMD has developed an air quality guidance document with suggested measures to reduce the amount of fugitive dust that is re-entrained into the atmosphere from unpaved areas, parking lots, and construction sites.

SCAG 2016-2040 RTP/SCS

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region and is the largest MPO in the U.S. Regarding air quality and other regional planning issues, SCAG adopted the 2016-2040 RTP/SCS in 2016, which provides long-range visioning that balances future mobility and housing needs with economic, environmental, and public health goals. The 2016-2040 RTP/SCS charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The 2016-2040 RTP/SCS was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. In June 2016, SCAG received its conformity determination from the Federal Highway Administration and the Federal Transit Administration indicating that all air quality conformity requirements for the 2016-2040 RTP/SCS and associated 2015 Federal Transportation Improvement Program Consistency Amendment through Amendment 15-12 have been met.[25] As previously noted, the SCAQMD 2016 AQMP applies the updated SCAG growth forecasts assumed in the 2016-2040 RTP/SCS.

[25] Southern California Association of Governments, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016.

City of Santa Clarita General Plan

The City of Santa Clarita's General Plan Conservation and Open Space Element and Circulation Element provide goals, objectives, and policies related to air quality, which are listed below.[26,27]

Conservation and Open Space Element: Air Quality

- Goal CO 7: Clean air to protect human health and support healthy ecosystems.
  - Objective CO 7.1: Reduce air pollution from mobile sources.
    - Policy CO 7.1.1: Through the mixed land use patterns and multi-modal circulation policies set forth in the Land Use and Circulation Elements, limit air pollution from transportation sources.
    - Policy CO 7.1.2: Support the use of alternative fuel vehicles.
    - Policy CO 7.1.3: Support alternative travel modes and new technologies, including infrastructures.
  - Objective CO 7.2: Apply guidelines to protect sensitive receptors from sources of air pollution as developed by the California Air Resources Board (CARB), where appropriate.
    - Policy CO 7.2.1: Ensure adequate spacing of sensitive land uses from the following sources of air pollution: high traffic freeways and roads; distribution centers; truck stops; chrome plating facilities; dry cleaners using perchloroethylene; and large gas stations, as recommended by CARB.
  - Objective CO 7.3: Coordinate with other agencies to plan for and federal implement programs for improving air quality in the South Coast Air Basin.
    - Policy CO 7.3.1: Coordinate with local, regional, state, and federal agencies to develop and implement regional air quality policies and programs.

Circulation Element: Multi-Modal Circulation Network

- Goal C 1: An inter-connected network of circulation facilities that integrates all travel modes, provides viable alternatives to automobile use, and conforms with regional plans.
  - Objective C 1.2: Coordinate land use and circulation planning to achieve greater accessibility and mobility for users of all travel modes.
    - Policy C 1.2.2: Create walkable communities, with paseos and walkways connecting residential neighborhoods to multi-modal transportation services such as bus stops and rail stations.
    - Policy C 1.2.3: Require that new commercial and industrial development provide walkway connections to public sidewalks and transit stops, where available.

[26] City of Santa Clarita, General Plan Conservation and Open Space Element, 2011.

[27] City of Santa Clarita, General Plan Circulation Element, 2011.

- Objective C 1.3: Ensure conformance of the Circulation Plan with regional transportation plans.
    - Policy C 1.3.3: Through trip reduction strategies and emphasis on multi-modal transportation options, contribute to achieving the air quality goals of the South Coast Air Quality Management District Air Quality Management Plan.

4.2.3 CONSIDERATION AND DISCUSSION OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

In accordance with CEQA Guidelines Appendix G, the Project would have a significant impact related to air quality if it would:

Threshold (a) **Conflict with or obstruct implementation of the applicable air quality plan.**

Threshold (b) **Result in a cumulatively considerable net increase of any criteria pollutants for which the project region is non-attainment under an applicable federal or state ambient air quality standard.**

Threshold (c) **Expose sensitive receptors to substantial pollutant concentrations.**

Threshold (d) **Result in other emissions (such as those leading to odors adversely affecting a substantial number of people.**

Appendix G of the CEQA Guidelines indicates that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to determine whether the Project would have a significant impact on air quality. The SCAQMD *CEQA Quality Handbook*, as revised in March 2015, sets forth quantitative emissions thresholds, below which a Project would not have a significant impact on ambient air quality.[28] Project-related air quality impacts estimated in this environmental analysis would be considered significant if any of the applicable significance thresholds, shown in **Table 4.2-4**, below, are exceeded.

Table 4.2-4
SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	**Construction (pounds per day)**	**Operation (pounds per day)**
VOCs	75	55
NO_x	100	55
CO	550	550
SO_x	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55
Lead[a]	3	3

[28] South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, originally published in CEQA Air Quality Handbook, Table A9-11-A, revised 2015.

Table 4.2-4, continued

TACs and Odor Thresholds	
TACs[b]	Maximum incremental cancer risk ≥ 10 in 1 million Chronic and acute hazard index ≥ 1.0 (project increment)
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402
Ambient Air Quality Standards for Criteria Pollutants[c]	
NO_2 1-hour average NO_2 annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.030 ppm (state) and 0.0534 ppm (federal)
CO 1-hour average CO 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)
PM_{10} 24-hour average PM_{10} annual average	10.4 µg/m³ (construction)[d] 2.5 µg/m³ (operation) 1.0 µg/m³
$PM_{2.5}$ 24-hour average	10.4 µg/m³ (construction)[d] 2.5 µg/m³ (operation)

Source: SCAQMD, Air Quality Significance Thresholds, 2015.

Notes: GHG emissions thresholds for industrial projects, as added in the March 2015 revision to the SCAQMD Air Quality Significance Thresholds, were not included in Table 4.2-4 as they will be addressed in the GHG emissions analysis and not in this section.

[a] The phaseout of leaded gasoline started in 1976. Since gasoline no longer contains lead, the Project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

[b] TACs include carcinogens and noncarcinogens.

[c] Ambient air quality standards for criteria pollutants are based on SCAQMD Rule 1303, Table A-2, unless otherwise stated.

[d] Ambient air quality thresholds are based on SCAQMD Rule 403.

A project would result in a substantial contribution to an existing air quality violation of the NAAQS or CAAQS for O_3, which is a non-attainment pollutant, if the Project's construction or operational emissions would exceed the SCAQMD VOC or NO_x threshold shown in **Table 4.2-4**. These emission-based thresholds for O_3 precursors are intended to serve as a surrogate for an "ozone significance threshold" (i.e., the potential for adverse O_3 impacts to occur) because O_3 itself is not emitted directly, and the effects of an individual project's emissions of O_3 precursors on levels in ambient air cannot be determined through air quality models or other quantitative methods.

In addition to the emission-based thresholds listed in **Table 4.2-4**, the SCAQMD also recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of the Project as a result of construction activities. Such an evaluation is referred to as localized significance threshold (LST) analysis. For project sites of 5 acres or less, the SCAQMD LST Methodology includes lookup tables that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance criteria (i.e., the emissions would not cause an exceedance of the applicable concentration limits for NO_2, CO, PM_{10}, and $PM_{2.5}$) without performing dispersion modeling.[29] The Project Site is approximately 2 acres; therefore, an LST evaluation using the lookup tables is utilized for this analysis.

The LST significance thresholds for NO_2 and CO represent the allowable increase in concentrations above background levels in the vicinity of a project that would not cause or contribute to an exceedance of the relevant ambient air quality standards, while the threshold for PM_{10} represents

[29] SCAQMD, Final Localized Significance Threshold Methodology, revised July 2009.

compliance with Rule 403 (Fugitive Dust). The LST significance threshold for $PM_{2.5}$ is intended to ensure that construction emissions do not contribute substantially to existing exceedances of the $PM_{2.5}$ ambient air quality standards. The allowable emission rates depend on the source-receptor area (SRA) in which the Project Site is located, the size of the Project Site, and distance between the Project Site and nearest sensitive receptors (e.g., residences, schools, hospitals). The Project Site is located in SRA 13, Santa Clarita Valley. The nearest sensitive receptor (i.e., the existing hospital) is approximately 60 feet to the west of the proposed buildings. As such, the LST receptor distance was assumed to be 82 feet (25 meters), which is the shortest distance provided by the SCAQMD lookup tables. The LST values from the SCAQMD lookup tables for SRA 13 (Santa Clarita Valley) for the 2-acre Project Site and a receptor distance of 25 meters are shown in **Table 4.2-5**.

Table 4.2-5
Localized Significance Thresholds for Source Receptor Area 13 (Santa Clarita Valley)

Pollutant	Threshold (pounds per day)
NO_2	163
CO	877
PM_{10}	6
$PM_{2.5}$	4

Source: SCAQMD, Final Localized Significance Threshold Methodology, 2009.
Notes: LST thresholds were determined based on the values for 2-acre site at a distance of 25 meters from the nearest sensitive receptor.

METHODOLOGY

The analysis in this section is derived from the 2019 Air Quality and Greenhouse Gas Emissions Analysis and Technical Report prepared by Dudek and available as **Appendix B** of this Draft SEIR.[30] The Proposed Project would result in air pollutant emissions, resulting from construction and operation of the Project. Specific methods for evaluating construction and operation emissions are summarized below.

Project Construction

Emissions from the construction phase of the Project were estimated using CalEEMod Version 2016.3.2. The analysis assumed that construction of the Project would commence in April 2021 and would last approximately 20 months, ending in December 2022. Construction schedule assumptions, including phase type, duration, and sequencing, were based on information provided by the Project applicant and is intended to represent a reasonable scenario based on the best information available. Default values provided in CalEEMod were used where detailed Project information was not available. Further details regarding modeling assumptions, emissions factors, and types and quantities of construction equipment are provided in **Appendix B** of this Draft SEIR.

As discussed above, criteria air pollutant emissions associated with temporary construction activity were quantified using CalEEMod. Construction emissions were calculated for the estimated worst-case day over the construction period associated with each phase and reported as the maximum daily emissions estimated during each year of construction (2021 through 2022).

[30] Dudek, Air Quality and Greenhouse Gas Emissions Analysis Technical Report for the Henry Mayo Newhall Hospital Expansion Project, City of Santa Clarita, California, February 2020.

Project Operation

Emissions from the operational phase of the Project were estimated using CalEEMod Version 2016.3.2, with an operational year of 2022. Emission estimates include operational emissions from area sources (such as emissions from consumer product use, architectural coatings, and landscape maintenance equipment), energy sources (such as emissions associated with building electricity and natural gas usage), mobile sources (such as emissions from motor vehicles traveling to and from the Project Site), and stationary sources (such as emissions from six diesel-fueled generators, water boilers, and steam boilers) associated with the Proposed Project. Maintenance and operation of the six diesel-fueled generators, which would be located on the roof of the D&T Building, would include operating each generator 30-minutes per week and testing each generator for four hours every three years. As stated in PDF-AQ-1, below, testing of the generators would be staged so that no more than one generator would be tested on any given day to reduce worst-case daily emissions. Further detail regarding modeling assumptions and emissions factors are provided in **Appendix B** of this Draft SEIR.

Localized Significance Thresholds (LST) Analysis

An LST analysis has been prepared to determine potential impacts to nearby sensitive receptors during construction of the Project. To provide a conservative analysis, the minimum distance (25 meters or 82 feet) provided in the SCAQMD LST look-up tables were utilized in this analysis. Additionally, given the size of the development and anticipated construction area, which is approximately 2 acres, the LSTs for a 2-acre site were utilized in this analysis. The SCAQMD also recommends the evaluation of localized NO_2, CO, PM_{10}, and $PM_{2.5}$ impacts as a result of construction activities to sensitive receptors in the immediate vicinity of the Project site. The impacts were analyzed using methods consistent with those in the SCAQMD's *Final Localized Significance Threshold Methodology*. According to the *Final Localized Significance Threshold Methodology*, "off-site mobile emissions from the Project should not be included in the emissions compared to the LSTs."[31]

Operational Health Risk Assessment (HRA)

An HRA was performed to evaluate potential health risk associated with operation of the stationary sources connected with the Project. The following discussion summarizes the dispersion modeling and HRA methodology. A dispersion modeling analysis was conducted of TACs emitted by point source exhaust stacks to be located on the roof of the new D&T Building. The dispersion modeling was performed using AERMOD Version 18081, which is the model USEPA approved and SCAQMD recommends for atmospheric dispersion of emissions. Additional information regarding assumptions made during the HRA analysis is presented in the Health Risk Assessment Report, prepared by Dudek and available as **Appendix C** of this Draft SEIR.[32]

PROJECT DESIGN FEATURES

The following project design feature related to air quality emissions will be implemented as part of the Project:

[31] South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, revised 2009.

[32] Dudek, Health Risk Assessment Report for the Henry Mayo Newhall Hospital 2018 Amended Specific Plan Project, City of Santa Clarita, California, July 2019.

PDF-AQ-1: To ensure contribution to ozone formation during emergency generator testing is minimized, if a triennial 4-hour emergency generator testing is conducted by the applicant or its contractors, the testing period will occur only between November and April. Additionally, testing of more than one generator per day will be prohibited to avoid compounding emissions from testing of multiple generators at one time. This testing schedule will be identified specifically in the application for Authority to Construct submitted to the SCAQMD. A copy of the Authority to Construct issued by the SCAQMD will be submitted to the City of Santa Clarita Planning Department.

PROJECT IMPACTS

Threshold (a): Would the project conflict with or obstruct implementation of the applicable air quality plan?

The SCAQMD has established criteria for determining consistency with the AQMP, in the SCAQMD CEQA Air Quality Handbook.[33] The criteria are as follows:

- Consistency Criterion No. 1: The proposed project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP.
- Consistency Criterion No. 2: The proposed project will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Consistency Criterion No. 1

As discussed under the following impact (**Threshold b**), the Project would not result in any exceedance of the SCAQMD's daily emissions thresholds for construction or operation for VOC, NO_x, PM_{10}, or $PM_{2.5}$ emissions. Therefore, the Proposed Project would not result in a cumulatively considerable net increase in criteria pollutant emissions for which the region is non-attainment under an applicable federal or State ambient air quality standard. Accordingly, the Project would not contribute to an existing air quality violation of the NAAQS or CAAQS and, as such, would not conflict with Consistency Criterion No. 1.

Consistency Criterion No. 2

While striving to achieve the NAAQS for O_3 and $PM_{2.5}$ and the CAAQS for O_3, PM_{10}, and $PM_{2.5}$ through a variety of air quality control measures, the 2016 AQMP also accommodates planned growth in the Basin. Projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors (e.g., population, employment) is consistent with the underlying regional plans used to develop the AQMP.

The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by SCAG for its 2016-2040 RTP/SCS, which is based on general plans for cities and counties in the Basin, for the development of the AQMP emissions inventory.[34] The SCAG 2016-2040 RTP/SCS and associated regional growth

[33] South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993.

[34] SCAQMD, Final 2016 Air Quality Management Plan, March 16, 2017.

forecast are generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with local government plans. The General Plan land use designation for the Project Site is Specific Plan (SP). The Project would be consistent with the current General Plan and Specific Plan land use designation and zoning. However, the general site development regulations stipulated in the 2016 Specific Plan limit the maximum square footage of the campus to 698,000 square feet. The Project would add 200,000 square feet of hospital-related building space, thus increasing the building density within the specific plan area to 898,000 square feet. The new building would accommodate uses that are primarily already operating within the existing Main Hospital Building and MOB-1. Accordingly, the existing uses to be accommodated by the Project would not generate a substantial increase in the number of employees on-site. However, the building floor area within the existing Main Hospital Building (approximately 138,000 square feet) would be re-occupied with new hospital uses, including MRI space, administrative and procedure rooms. Therefore, the employee estimate is based on the re-occupancy of the building floor area within the existing Main Hospital Building. Based on Institute of Traffic Engineers (ITE) assumptions, it is estimated the Proposed Project would add 371 employees.[35] This estimate is conservative because the re-occupancy would be backfilled by a portion of the administrative and physical therapy employees from other buildings on the HMNH campus. These employees are located in undersized areas; accordingly, while there would be an increase in floor area, almost the same number of employees would be able to occupy larger spaces to function in such spaces more efficiently and effectively. As such, the addition of 371 employees is anticipated to be a conservative estimate of employment growth as part of this Project.

The SCAG 2016-2040 RTP/SCS provides employee estimates for the years 2012 and 2040. To provide an interim year comparison, this analysis interpolates the City's projected employee population in the Project's operational year (2022) based on the average growth rate to compare with the estimated increase in employees generated by the Project. The SCAG 2016-2040 RTP/SCS estimates that the City's employee population will increase approximately 30 percent between 2012 and 2040. Regarding population, the SCAG 2016-2040 RTP/SCS estimates that the City's total households will increase approximately 30 percent between 2012 and 2040.

The SCAG 2016-2040 RTP/SCS forecasted values for 2012 and 2040 along with the interpolated 2022 values for the City's population and employees is presented in **Table 4.2-6**.

Table 4.2-6
SCAG 2016 RTP/SCS Regional Growth Forecast

Year	Population Estimate	Employee Estimate
2012	202,000	73,500
2022	225,650[a]	82,300[b]
2040	262,200	95,900

Source: SCAG, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016
Notes:
[a] The population estimate for 2022 was interpolated based on the population forecast values for 2012 and 2040 provided in the SCAG 2016-2040 RTP/SCS.
[b] The employee estimate for 2022 was interpolated based on the employment forecast values for 2012 and 2040 provided in the SCAG 2016-2040 RTP/SCS.

The Proposed Project's 371 potential employees would not exceed the interpolated annual growth rate of 800 employees a year for the City of Santa Clarita. Based on these considerations,

[35] ITE assumes 372 square feet per employee for hospital land uses.

vehicle trip generation and planned development for the Project Site are concluded to have been anticipated in the SCAG growth projections because the land use designation and zoning would remain the same (i.e., Specific Plan), despite the increase in the building square footage within the Specific Plan area. Because the addition of Project-generated employees to the City's estimated employee population would not exceed the SCAG 2016-2040 RTP/SCS forecasted population, implementation of the Project would not result in a conflict with, or obstruct implementation of, the applicable air quality plan (i.e., SCAQMD 2016 AQMP). Accordingly, the Project would meet Consistency Criterion No. 2.

Summary

The Project would not result in an increase in the frequency and severity of existing air quality violations and would not conflict with Criterion No. 1. Additionally, implementation of the Project would not exceed the demographic growth forecasts in the SCAG 2016-2040 RTP/SCS; therefore, the Project would also be consistent with the SCAQMD 2016 AQMP, which based future emission estimates on the SCAG 2016-2040 RTP/SCS. Thus, the Project also would not conflict with Criterion No. 2. Based on these considerations, impacts related to the Project's potential to conflict with or obstruct implementation of the applicable air quality plan would be less than significant.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

The 2008 Master Plan EIR determined that the HMNH Master Plan would have a less-than-significant impact on consistency with the projections of the SCAQMD's 2007 AQMP and would not require an amendment to the AQMP or SCAG's 2004 Regional Transportation Plan/Growth Vision: Socio Economic Forecast Report. The 2016 Specific Plan EIR addendum determined that the Specific Plan would not cause an increase in the nature or intensity of uses, programs, employees, number of patient beds, or square footage allotted to administrative uses and would, therefore, not result in a new significant effect. As described above, implementation of the Proposed Project would not result in a conflict with, or obstruct implementation of, the 2016 AQMP and would, therefore, not result in any additional impacts beyond those identified in the 2008 Master Plan EIR.

Mitigation Measures

Impacts related to the Project's potential to conflict with or obstruct implementation of the applicable air quality plan were determined to be less than significant. Therefore, no mitigation measures would be required.

Level of Significance After Mitigation

Impacts related to the Project's potential to conflict with or obstruct implementation of the applicable air quality plan were determined to be less than significant without mitigation.

Threshold (b): Would the project result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is non-attainment for under an applicable federal or state ambient air quality standard?

Air pollution is largely a cumulative impact. The non-attainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, Project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality.

In considering cumulative impacts from the Project, the analysis must specifically evaluate a project's contribution to the cumulative increase in pollutants for which the Basin is designated as non-attainment for the CAAQS and NAAQS. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution to nonattainment status in the Basin. According to SCAQMD guidance, if a project does not exceed thresholds and is determined to have less-than-significant project-specific impacts, then the project would not contribute to cumulative emissions-related impacts.

Construction Emissions

Construction of the Project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions. Therefore, such emission levels can only be approximated with a corresponding uncertainty in precise ambient air quality impacts.

Implementation of the Project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, architectural coatings, and asphalt pavement application. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. The Project would be required to comply with SCAQMD Rule 403 to control dust emissions generated during the grading activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites three times per day depending on weather conditions. Internal combustion engines used by construction equipment, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOCs, NO_x, CO, PM_{10}, and $PM_{2.5}$. The application of architectural coatings, such as exterior application/interior paint and other finishes, and application of asphalt pavement would also produce VOC emissions; however, the contractor is required to procure architectural coatings from a supplier in compliance with the requirements of SCAQMD's Rule 1113 (Architectural Coatings).

Table 4.2-7 presents the estimated maximum daily construction emissions generated during construction of the Project.

Table 4.2-7
Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC (lbs/day)	NOx (lbs/day)	CO (lbs/day)	SOx (lbs/day)	PM10 (lbs/day)	PM2.5 (lbs/day)
2021	2.67	21.30	20.03	0.05	3.58	2.19
2022	59.86	19.59	19.44	0.05	2.64	1.21
Maximum Daily Emissions	**59.86**	**21.30**	**20.03**	**0.05**	**3.58**	**2.19**
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: The values shown are the maximum summer or winter daily emissions results from CalEEMod. These emissions reflect CalEEMod "mitigated" output, which accounts for compliance with SCAQMD Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings).

Maximum daily emissions of NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions would occur during the grading phase in 2021 as a result of off-road equipment operation and on-road vendor trucks and haul trucks. The architectural coatings phase in 2022 would produce the maximum daily VOC

emissions. As shown in **Table 4.2-7**, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ during construction in both construction years. Construction-generated emissions would be temporary and would not represent a long-term source of criteria air pollutant emissions. As such, impacts related to construction would be less than significant.

Operational Emissions

The Project involves the development of two new buildings totaling 200,000 square feet, 292 parking spaces, and several stationary sources. Operation of the Project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources, including vehicle trips from future employees; area sources, including the use of consumer products, architectural coatings for repainting, and landscape maintenance equipment; energy sources, including combustion of fuels used for space and water heating, and stationary sources, including six diesel-powered emergency generators located on the roof of the D&T Building.

Table 4.2-8 presents the maximum daily area, energy, mobile, and stationary source emissions associated with operation of the Project (year 2022).

Table 4.2-8
Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC (lbs/day)	NOx (lbs/day)	CO (lbs/day)	SOx (lbs/day)	PM10 (lbs/day)	PM2.5 (lbs/day)
Area	4.52	0.00	0.06	0.00	0.00	0.00
Energy	0.38	3.33	2.80	0.02	0.25	0.25
Mobile	2.35	11.40	26.08	0.10	7.66	2.10
Stationary	7.19	22.02	36.12	0.16	2.50	2.50
Total	**14.42**	**36.76**	**65.05**	**0.27**	**10.41**	**4.85**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: The values shown are the maximum summer or winter daily emissions results from CalEEMod. These emissions reflect CalEEMod "mitigated" output and operational year 2022. Due to rounding, values may not total exactly.

As shown in **Table 4.2-8,** the combined daily area, energy, mobile, and stationary source emissions would not exceed the SCAQMD operational thresholds for VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$.

As discussed above, the Basin has been designated as a federal non-attainment area for O_3 and $PM_{2.5}$ and a State non-attainment area for O_3, PM_{10}, and $PM_{2.5}$. The non-attainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the Basin, including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction and operation of the Project would generate VOC and NO_x emissions (which are precursors to O_3) and emissions of PM_{10} and $PM_{2.5}$. As indicated in **Tables 4.2-7** and **4.2-8**, Project-generated construction and operational emissions, respectively, would not exceed the SCAQMD emission-based significance thresholds for VOC, NO_x, CO, PM_{10}, or $PM_{2.5}$.

Cumulative localized impacts would potentially occur if a construction project were to occur concurrently with another off-site project. Construction schedules for potential future projects near the Project Site are currently unknown; therefore, potential construction impacts associated with

two or more simultaneous projects would be considered speculative.[36] However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation if that project were to exceed SCAQMD thresholds. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM_{10} and $PM_{2.5}$ emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAQMD.

Based on the previous considerations, the Project would not result in a cumulatively considerable increase in emissions of non-attainment pollutants. Therefore, cumulative impacts would be considered less than significant.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

The 2008 Master Plan EIR determined that Project-related impacts would cause a cumulative considerable increase in emissions for pollutants for which the Basin is in non-attainment (i.e., PM_{10} and $PM_{2.5}$). Specifically, the Master Plan EIR found that short-term construction air quality effects would be significant and unavoidable, even with implementation of mitigation measures designed to reduce the significance of such impacts.

However, the 2008 Master Plan EIR determined that operational cumulative air quality effects would be less than significant with implementation of a mitigation measure designed to prevent use of paints and solvents with high concentrations of VOCs.

As described above, Project-generated construction and operational emissions would not exceed the SCAQMD emission-based significance thresholds for VOC, NO_x, CO, PM_{10}, or $PM_{2.5}$ and would, therefore, not result in any additional impacts beyond those identified in the 2008 Master Plan EIR.

Mitigation Measures

Impacts related to the Project's contribution to a cumulatively considerable net increase of any criteria air pollutant for which the region is non-attainment for under an applicable federal or State ambient air quality standard were determined to be less than significant. No additional mitigation measures to reduce the Proposed Project's construction or operational impacts beyond those identified in the 2008 Master Plan EIR are required or proposed.

Level of Significance After Mitigation

Impacts related to the Project's contribution to a cumulatively considerable net increase of any criteria air pollutant for which the region is non-attainment for under an applicable federal or State ambient air quality standard were determined to be less than significant without mitigation.

[36] The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145). This discussion is, nonetheless, provided in an effort to show good-faith analysis and comply with CEQA's information disclosure requirements.

Threshold (c): Would the project expose sensitive receptors to substantial pollutant concentrations?

Localized Significance Thresholds Analysis

The Proposed Project is located on an existing HMNH campus; therefore, there are healthcare facilities immediately adjacent to and surrounding the proposed buildings, the closest of which is the IP-1 Building, approximately 20 feet to the west of Lot D. Otherwise, residential land uses are located to the north, east, south, and west of the HMNH campus. The closest off-site sensitive receptors to the new stationary sources in the D&T Building and IP-2 Building are residences to the southeast along Via Jacara, which are approximately 150 feet away from the Project Site (more specifically PS-4). Hauling of soils and construction materials associated with the Project construction are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways; emissions from the trucks would be relatively brief in nature and would cease once the trucks pass through the main streets.

Construction activities associated with the Project would result in temporary sources of on-site fugitive dust and construction equipment emissions. The maximum allowable daily emissions that would satisfy the SCAQMD localized significance criteria for SRA 13 are presented in **Table 4.2-9** and compared to the maximum daily on-site construction emissions generated during the Project.

Table 4.2-9
Localized Significance Thresholds Analysis for Project Construction

Maximum On-site Emissions	NO2 (lbs/day)	CO (lbs/day)	PM10 (lbs/day)	PM2.5 (lbs/day)
Construction Emissions	20	15	3	2
SCAQMD LST	*163*	*877*	*6*	*4*
LST Exceeded?	**No**	**No**	**No**	**No**

Source: SCAQMD, Final Localized Significance Threshold Methodology, 2009.
Notes: Localized significance thresholds are shown for 2-acre project sites corresponding to a distance to a sensitive receptor of 25 meters. These estimates reflect control of fugitive dust required by Rule 403.
Greatest on-site NO_2, PM_{10}, and $PM_{2.5}$ emissions are associated with the grading phase. Greatest on-site CO emissions are associated with the demolition phase.

As shown in **Table 4.2-9**, construction activities would not generate emissions in excess of site-specific LSTs; therefore, site-specific construction impacts during construction of the Project would be less than significant. In addition, diesel equipment would also be subject to the CARB air toxic control measures for in-use off-road diesel fleets, which would minimize DPM emissions.

Health Impacts of Toxic Air Contaminants

An HRA was prepared for the Project to estimate the health risk impacts to existing sensitive receptors from exposure to TAC emissions from the new stationary sources proposed by the Project. As stated above, the stationary sources proposed by the Project include six emergency diesel-fueled generators, steam boilers, and water heaters that would be placed in the basement and on the rooftop of the proposed D&T Building and IP-2 Building. The HRA is available as **Appendix C** of this Draft SEIR.[37]

[37] Dudek, Health Risk Assessment for the Henry Mayo Newhall Hospital 2018 Amended Specific Plan Project, City of Santa Clarita, California, July 2019.

In addition to impacts from criteria pollutants, Project impacts may include emissions of pollutants identified by the State and federal government as TACs or hazardous air pollutants (HAPs).

The greatest potential for TAC emissions during construction would be DPM from heavy equipment operations and heavy-duty trucks. The closest on-site sensitive receptors would be patients in the IP-1 Building, located approximately 20 feet to the west. The nearest off-site sensitive receptors would be the residences located approximately 150 feet south of PS-4. As shown in **Table 4.2-7**, maximum daily particulate matter (PM_{10} or $PM_{2.5}$) emissions generated by construction equipment operation and from hauling of soil during grading (exhaust particulate matter or DPM), combined with fugitive dust generated by equipment operation and vehicle travel, would be well below the SCAQMD significance thresholds. Moreover, total construction of the Project would last approximately 20 months, after which Project construction-related TAC emissions would cease.

Operational Health Risk

An HRA was performed to estimate the Maximum Individual Cancer Risk, the Chronic Hazard Index, and the Acute Hazard Index for residential receptors as a result of the Project's operation of stationary sources on-site (e.g., emergency generators, boilers). The results of the HRA are presented in **Table 4.2-10**.

Table 4.2-10
Operational Health Risk Assessment Results

Receptor	Cancer Risk (persons per million)a	Chronic Hazard Index[a]	Acute Hazard Index[b]
Maximally Exposed Individual Resident (MEIR)	1.68	0.00098	0.0022
SCAQMD Significance Threshold	10	1	1
Exceed Threshold?	**No**	**No**	**No**

Source: SCAQMD, Air Quality Significance Thresholds, 2015.
Note: MEIR = Maximally Exposed Individual Resident.
[a] The MEIR for annual cancer and chronic health risk impacts is located to the northwest of the new stationary sources, near 25851 Anzio Way.
[b] The MEIR for the 1-hour acute health risk impact is located to the south of the new stationary sources, across McBean Parkway, near 23845 Via Jacara.

The HMNH new stationary source potential cancer health risk of 1.68 in a million would not exceed the SCAQMD threshold of 10 in a million. The non-cancer chronic and acute hazard indices of 0.00098 and 0.0022, respectively, would not exceed the SCAQMD threshold of 1.0. Thus, the proposed stationary sources would result in less-than-significant cancer, chronic, and acute health risk impacts at proximate sensitive residential receptors.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

As stated above, the 2008 Master Plan EIR determined that pollution emissions for $PM_{2.5}$ and PM_{10} would exceed the localized significance thresholds during construction, primarily as a result of grading activities. While construction impacts could not be mitigated to a less-than-significant level, the 2008 Master Plan EIR included standard air quality pollution control mitigation measures (i.e., **Mitigation Measure AQ1** and **Table 5.6-9** in Section 5.6, Air Quality, of the 2008 Master Plan Draft EIR) to serve to reduce the impacts associated with construction activities. Impacts regarding TACs were not addressed in the 2008 Master Plan EIR. As discussed above, the Proposed Project would generate particulate matter (PM_{10} or $PM_{2.5}$) emissions through construction and grading activities (DPM emissions), as well as through fugitive dust generated by equipment

operation and vehicle travel; however, these particulate matter emissions associated with the Proposed Project would be well below the SCAQMD significance thresholds. Moreover, total construction of the Project would last approximately 20 months, after which Project construction-related TAC emissions would cease. Therefore, no significant impacts would occur as a result of the Proposed Project.

Mitigation Measures

Impacts related to the exposure of sensitive receptors to substantial pollutant concentrations were determined to be less than significant. Therefore, no mitigation measures would be required.

Level of Significance After Mitigation

Impacts related to the exposure of sensitive receptors to substantial pollutant concentrations were determined to be less than significant without mitigation.

Threshold (d): Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the Project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the Project Site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts related to other emissions (such as those leading to odors) adversely affecting a substantial number of people during construction would be less than significant.

The Project entails operation of a hospital facility and would not result in the creation of a land use that is commonly associated with odors. Therefore, impacts related to other emissions (such as those leading to odors) adversely affecting a substantial number of people during Project operations would be less than significant.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

The 2008 Master Plan EIR did not identify any objectional odors generated by the uses proposed under the Master Plan. The proposed addition of the new D&T Building and IP-2 Building, as well as 292 parking spaces to PS-4), would not generate odors. Therefore, no new impacts related to other emissions (such as those leading to odors) adversely affecting a substantial number of people would result from the Proposed Project.

Mitigation Measures

Impacts related to other emissions (such as those leading to odors) adversely affecting a substantial number of people were determined to be less than significant. Therefore, no mitigation measures would be required.

Level of Significance After Mitigation

Impacts related to other emissions (such as those leading to odors) adversely affecting a substantial number of people were determined to be less than significant without mitigation.

4.2.4 CUMULATIVE IMPACTS

As stated above, air pollution is largely a cumulative impact, which is discussed under Threshold (b), above. The potential for the Project to result in a cumulatively considerable impact, per the SCAQMD guidance and thresholds, is based on the Project's potential to exceed the Project-specific daily thresholds. As discussed previously, maximum construction and operational emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$. Therefore, the Project would not contribute to a cumulative considerable net increase in criteria pollutant emissions. As such, cumulative impacts would be less than significant.

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This section of this Draft SEIR analyzes the potential impacts of the Project's construction and operation on energy resources serving the HMNH campus, including electricity and natural gas supply and infrastructure, as well as the efficiency of usage of nonrenewable resources. This section also recommends mitigation measures to reduce the significance of such impacts, if any are identified.

4.3.1. ENVIRONMENTAL SETTING

ELECTRICITY

California, being the most populated State and the State with the largest economy, has the second highest total energy demand in the country. Even though the energy demand is high, the State has among the lowest per capita total energy consumption levels in the country, which the California Energy Commission (CEC) states is partially the result of extensive efforts to increase energy efficiency in the State, along with implementation of alternative technologies.[1]

As of 2016, natural gas-fired power plants provide roughly 50 percent of California's in-State electricity generation.[2] Renewable sources of energy, such as solar, wind, geothermal, and hydroelectric power, account for another 40 percent of California's energy generation; however, hydroelectric power generation varies depending on annual precipitation. In 2015, hydroelectric power supplied less than 10 percent of California's net power generation, due to prolonged drought, but in 2016, when the winter brought increased precipitation, hydroelectric power generation provided approximately 14 percent of the State's power generation. Nuclear power accounts for 10 percent and coal-fired sources accounts for less than 0.2 percent of California's power generation.

While California generates the majority of its power, as specified above, more than 25 percent of California's electric supply comes from outside of the State, with much of the power coming from wind farms in the Pacific Northwest. Other sources of power include coal- and natural gas-fired power plants, as well as nuclear power-generating stations, in the southwestern states.[3]

The California Public Utilities Commission (CPUC) also regulates investor-owned electric power utility companies. This includes oversight of electric utility energy-efficiency programs, procurement and generation, electric rates, and infrastructure. Significant new infrastructure investments are required as California transitions to a low-carbon energy network, such as infrastructure to move renewable energy from remote areas of the State, where it is generated, to urban areas where demand is greater.

Southern California Edison (SCE) currently supplies electricity to the HMNH campus. As of 2017, SCE's power sources include 32 percent renewable (geothermal, small hydroelectric, solar, and wind), 0 percent coal, 8 percent large hydroelectric, 20 percent natural gas, 6 percent nuclear, and 34 percent "unspecified," which refers to electricity from transactions that are not traceable to specific generation sources.[4]

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1 U.S. Energy Information Administration, California State Energy Profile, https://www.eia.gov/state/print.php?sid=ca, accessed September 24, 2018.

2 Ibid.

3 Ibid.

4 Southern California Edison, *2017 Power Content Label, SCE Power Mix,* July 2018.

NATURAL GAS

The primary entities providing natural gas to California include Pacific Gas and Electric (PG&E), Southwest Gas, Southern California Gas Company (SoCalGas), San Diego Gas and Electric (SDG&E), and several small natural gas utilities. Many California natural gas customers are residential and small commercial customers, who accounted for approximately 32 percent of natural gas delivered from California utilities in 2012. Larger consumers, such as industrial uses and electric generators, accounted for approximately 68 percent of the natural gas delivered by utilities in 2012.[5] In Santa Clarita, the natural gas service provider is SoCalGas.

According to CPUC, most of the natural gas used in the State comes from outside of California. In 2012, only 9 percent of natural gas used by Californians originated in California. The rest of the natural gas used in California came from the southwestern U.S. (35 percent), the Rocky Mountains (40 percent), and Canada (16 percent). Natural gas from out-of-State sources is delivered to California via five major interstate natural gas pipelines: the Gas Transmission Northwest Pipeline, Kern River Pipeline, Transwestern Pipeline, El Paso Pipeline, and Mojave Pipeline. While the Federal Energy Regulatory Commission (FERC) regulates the transportation of natural gas on the interstate pipelines, CPUC often participates in FERC regulatory proceedings to represent the interests of California natural gas consumers.[6]

Most of the natural gas transported via the interstate pipelines is delivered into the PG&E and SoCalGas intrastate natural gas transmission pipeline systems. These systems are commonly referred to as California's "backbone" pipeline systems. Natural gas on the utilities' backbone pipeline systems is then delivered into the local transmission and distribution pipeline systems, or to natural gas storage fields. CPUC has regulatory jurisdiction over 150,000 miles of utility-owned natural gas pipelines, which transported 82 percent of the total amount of natural gas delivered to California's gas consumers in 2012.[7]

SoCalGas provides natural gas service to the HMNH campus. As of 2008, SoCalGas operates a 6-inch medium pressure gas main in McBean Parkway on both sides of the HNMH campus, as well as a 4-inch medium pressure gas main in Orchard Village Road, terminating at McBean Parkway.

4.3.2. REGULATORY FRAMEWORK

FEDERAL

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 was created to reduce greenhouse gas (GHG) emissions. It attempts to accomplish this legislative goal through increasing alternative fuel sources; requiring standards for regional efficiency of heating and cooling products, energy conservation, energy efficiency labeling, residential boiler efficiency, electric motor efficiency, and home appliances; and increasing efficiency of light bulbs.

[5] California Public Utilities Commission, Natural Gas and California, http://www.cpuc.ca.gov/natural_gas/, accessed September 21, 2018.

[6] California Public Utilities Commission, http://www.cpuc.ca.gov/natural_gas/, accessed September 21, 2018.

[7] Ibid.

STATE

California Public Utilities Commission (CPUC)

CPUC regulates investor-owned electric and natural gas utilities operators in California. This includes the utilities' in-State transmission and distribution systems, storage, procurement, metering, and billing. Specifically, CPUC has primary rate-making jurisdiction over the funding of distribution-related expenditures associated with 66 kilovolt powerlines and has a significant role in permitting transmission and substation facilities.

CPUC establishes a number of design, construction, inspection, and notification requirements for natural gas pipeline operators and conducts annual audits of natural gas pipeline operations. In addition to these roles, CPUC also operates Tariff Rule 20, which requires utilities to allocate funding annually for projects that convert aboveground utility lines to underground utility lines. If CPUC determines that a project is in the "public interest," then it can authorize the utility to recover the cost of that project from the ratepayers.

Energy Efficiency Programs

CPUC oversees investor-owned utility programs that are funded by small portions of electricity and gas rates paid by consumers, which provide over $1 billion per year to fund energy efficiency programs. These publicly funded programs are administered by the utilities (such as SCE) and provide customers with incentives to increase their energy efficiency, such as replacing older, long-term appliances (e.g., washer/dryer units, refrigerators) that are out of date with current energy efficiency codes with newer, more energy-efficient models. Often, customers are given larger incentives by these programs to upgrade when energy-efficient technology is new. As the technology has a larger market penetration and the prices are reduced, it may be adopted into building or appliance codes.

California Energy Commission (CEC)

CEC is the principal energy planning organization for California. It forecasts electrical needs Statewide; licenses power plants to meet those needs; promotes energy conservation and efficiency measures; promotes research, development, and demonstration projects; develops renewable energy resources and alternative energy techniques; and plans for and directs responses to state energy emergencies.

California's Renewables Portfolio Standards

California's Renewables Portfolio Standards (RPS), which requires retail sellers of electric services to increase the percentage of electricity obtained from renewable sources to 33 percent of total sales by 2020, 50 percent by 2026, and 60 percent by 2030, is overseen by CEC and CPUC. CPUC enforces compliance, reviews and approves investor-owned utilities' renewable energy procurement plans, and establishes standard terms and conditions in contracts that are for eligible renewable energy. CEC certifies renewable facilities, verifies that renewable energy output is only counted once for the RPS, and verifies retail product claims.

In September 2018, SB 100 updated the goals of California's RPS and SB 350 (see below) to achieve 50 percent renewable by December 31, 2026; 60 percent by December 31, 2030; and 100 percent of retail sales of electricity to California end-use customers and state agencies by December 31, 2045.

California Building Standards Code

Title 24 of the California Code of Regulations (CCR) is also known as the California Building Standards Code. Title 24 is the building code of California and regulates how buildings are designed and constructed in the State. Title 24 currently contains 11 distinct parts.

Title 24, Part 6

Title 24, Part 6, also known as the California Energy Code or the California Energy Efficiency Standards for Residential and Nonresidential Buildings, was created to reduce California's energy consumption. It addresses issues concerning design, construction, alteration, installation, or repair of building envelopes, space-conditioning systems, water-heating systems, indoor lighting systems of buildings, outdoor lighting and signage, and certain equipment designed to enhance building efficiency. The current Title 24 standards are the 2019 Building Energy Efficiency Standards, which went into effect on January 1, 2020.

Title 24, Part 11

Title 24, Part 11, also known as the California Green Building Standards (CALGreen Code) was created to improve public health, safety, and general welfare. The CALGreen Code contains requirements for nonresidential development that are designed to reduce negative environmental impacts and encourage sustainable practices for planning, design, energy efficiency, water conservation, resource conservation and efficiency, and environmental quality.

Senate Bill (SB) 350 – Clean Energy and Pollution Reduction Act

Signed in 2015, SB 350 established new clean energy, clean air, and GHG reduction goals for 2030 and beyond. SB 350 increases California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030 (since amended by SB 100 to be achieved by 2026). SB 350 also requires the State to double Statewide energy efficiency savings in electricity and natural gas end uses by 2030. To meet this goal, large utilities are required to submit Integrated Resource Plans, which detail how each utility will meet customer resource needs, reduce GHG emissions, and increase deployment of clean energy resources.

Assembly Bill (AB) 32 – California Global Warming Solutions Act

AB 32, also known as the California Global Warming Solutions Act of 2006, is designed to reduce GHG emissions to 2000 levels by 2010 and 1990 levels by 2020. Under this act, CPUC and CEC must provide information, analysis, and advice to the California Air Resources Board on reducing GHG emissions in the electricity and natural gas sectors.

SB 375 – Sustainable Communities and Climate Protection Act

SB 375, the Sustainable Communities and Climate Protection Act of 2008, supports compliance with AB 32 by coordinating land use planning, regional transportation plans, and funding priorities. SB 375 is instrumental in the formation of regional transportation plans and sustainable communities strategies, such as the ones for the Southern California Association of Governments (SCAG).

REGIONAL

2016-2040 Regional Transportation Plan/ Sustainable Communities Strategies (RTP/SCS)

SCAG's 2016-2040 RTP/SCS provides long-term transportation planning for the areas of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The 2016-2040 RTP/SCS covers strategies that range from encouraging infill and walkability to transportation investments. The primary goal of the 2016-2040 RTP/SCS is to help SCAG achieve GHG emission reductions targets for 2020 and 2035 that have been established by the California Air Resources Board. This is to be accomplished primarily through reducing vehicle miles traveled and developing more efficient communities.

LOCAL

AB 811 – Contractual Assessments: Energy Efficiency Improvements

In partnership with Los Angeles County, the City of Santa Clarita participates in a program to use AB 811 funds for a program providing energy audits, energy efficiency upgrades, and installation of photovoltaic solar power systems permanently attached to real property to reduce out-of-pocket expenses to the property owner.

City of Santa Clarita General Plan

Applicable goals, objectives, and policies from the General Plan Land Use Element and Conservation and Open Space Element are listed below.

<u>Land Use Element – Environmentally Responsible Development</u>

- Goal LU 7: Environmentally responsible development through site planning, building design, waste reduction, and responsible stewardship of resources.
  - Objective LU 7.1: Achieve greater energy efficiency in building and site design.
    - Policy LU 7.1.2: Promote the use of solar panels and renewable energy sources in all projects.
    - Policy LU 7.1.3: Encourage development of energy-efficient buildings, and discourage construction of new buildings for which energy efficiency cannot be demonstrated.

<u>Land Use Element – Public Facilities</u>

- Goal LU 9: Adequate public facilities and services, provided in a timely manner and in appropriate locations to serve existing and future residents and businesses.
  - Objective LU 9.1: Coordinate land use planning with provision of adequate public services and facilities to support development.
    - Policy LU 9.1.1: Ensure construction of adequate infrastructure to meet the needs of new development prior to occupancy.

Conservation and Open Space Element – Greenhouse Gas Reduction

- Goal CO 8: Development designed to improve energy efficiency, reduce energy and natural resource consumption, and reduce emissions of greenhouse gases.
  - Objective CO 8.3: Encourage the following green building and sustainable development practices on private development projects, to the extent reasonable and feasible.
    - Policy CO 8.3.2: Promote construction of energy efficient buildings through requirements for LEED certification or through comparable alternative requirements as adopted by local ordinance.
    - Policy CO 8.3.3: Promote energy efficiency and water conservation upgrades to existing non-residential buildings at the time of major remodel or additions.
    - Policy CO 8.3.8: Encourage energy-conserving heating and cooling systems and appliances, and energy-efficiency in windows and insulation, in all new construction.

4.3.3. CONSIDERATION AND DISCUSSION OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

In accordance with CEQA Guidelines Appendix G, the Project would have a significant environmental impact related to energy supply and/or infrastructure if it would:

Threshold (a): Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.

Threshold (b): Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Threshold (c): Require or result in the relocation or construction of new or expanded electric power or natural gas facilities, the construction or relocation of which could cause significant environmental effects.

METHODOLOGY

Construction and Operation

During construction and operation of the Proposed Project, energy would be consumed in the form of electricity and natural gas. The analysis of electricity and natural gas usage is based on California Emissions Estimator Model version 2016.3.2 (CalEEMod), which quantifies energy use for occupancy. Annual consumption of both electricity and natural gas was calculated using demand factors provided in CalEEMod as part of the GHG analysis (see Section 4.4 of this Draft SEIR). Additionally, the Project's estimated energy demands were analyzed relative to the existing demand on the HMNH campus, as well as to SCE's and SoCalGas's existing and planned energy supplies in 2022 to determine if these two companies would be able to meet the Proposed Project's energy demands. Finally, the capacity of local infrastructure for electricity and natural gas was evaluated to determine whether it could accommodate the estimated electricity and natural gas demand from the Project.

PROJECT IMPACTS

Threshold (a): Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.

Construction and operation of the Proposed Project would involve the use of many nonrenewable resources. The Project would be carried out in accordance with local and State regulations concerning building codes and safety and energy efficiency, including Title 24 requirements. To ensure the integrity of the built structures, nonrenewable resources, primarily in the form of fossil fuels, natural gas, and fuel oils for construction equipment and vehicles, would be used throughout this Project. However, use of such resources would not be unusual as compared to other construction projects and would not substantially affect the availability of such resources. Accordingly, these nonrenewable resources would not be used in a wasteful or inefficient manner. Of significant concern is the use of nonrenewable resources in supplying electricity and natural gas to the Project. These uses are summarized in **Table 4.3-1** and discussed in more detail, below.

Table 4.3-1
Project and Countywide Energy Consumption

Energy Type	Project Annual Energy Consumption	Los Angeles County Annual Energy Consumption[a,b]	Percentage Increase Countywide
Electricity Consumption	4,932.4 MWh	67,856,281 MWh	0.0073
Natural Gas Consumption	11,972 Mcf	281,992,919 Mcf[c]	0.0042

[a] California Energy Commission, Energy Reports, Electricity Consumption by County, Los Angeles (consumption for 2018), https://ecdms.energy.ca.gov/elecbycounty.aspx, accessed November 20, 2019.

[b] California Energy Commission, Energy Reports, Natural Gas Consumption by County, Los Angeles (consumption for 2018), https://ecdms.energy.ca.gov/gasbycounty.aspx, accessed November 20, 2019.

[c] Conversion from millions of therms/yr (as provided by CEC) to Mcf/yr (i.e., 1,000 cubic feet) was done using a conversion factor obtained from the U.S. Energy Information Administration, available at: https://www.eia.gov/tools/faqs/faq.php?id=45&t=8.

Construction

During construction, the Project would consume electricity through the conveyance of water used for dust control, as well as through powering lights, electronic equipment, and other construction activities that require electrical power. This electrical power would be supplied to the Project either by generators or SCE and would be obtained through the existing 16-kilovolt lines that run underground in McBean Parkway. These lines currently serve the HMNH campus. Construction activities typically do not involve the consumption of natural gas, and, as such, natural gas would not be supplied to support Project construction activities.

Construction methods used to build the Proposed Project would be typical of current construction practices and would not require use of more energy-intensive machinery. Even during the most intense period of construction, due to the different types of construction activities (e.g., site preparation, grading, construction), only portions of the Project Site would be disturbed at a time, with construction equipment being operated at different locations on the Project Site, rather than a single location. The Project would be subject to mandates from local and State regulations concerning energy efficiency. In addition, technological innovations and more stringent standards are being researched, such as multi-function equipment, hybrid equipment, or other design changes, which could help reduce the energy demand associated with construction in California over the next years. As such, temporary energy use during construction of the Proposed

Project would not result in a significant increase in peak or base demands on regional energy supplies or require additional capacity from local or regional energy supplies, and it would not result in a wasteful, inefficient, or unnecessary consumption of energy resources during the Project's construction.

Operation

Electricity

The Project would consume electricity during its operation through both usage in the structures themselves and through the conveyance of water to the Project. However, compliance with Title 24, including the CALGreen Code and the California Energy Code, the installation of high-efficiency lighting, and the use of water-efficient fixtures would ensure that the electricity used in the operation of the Project would be efficient. Additionally, SCE is required to comply with the RPS, which requires SCE to obtain 33 percent of its energy portfolio from certified renewable sources by 2020. For 2017, the most recent year available from CEC, SCE obtained 29 percent of its overall energy from eligible renewable sources.[8] Further, based on CPUC assumptions, SCE is estimated to have 55.2 percent of its energy come from eligible renewable sources in the year 2022, when the Project goes into operation, which is well beyond the RPS requirement of 38.5 percent for the year 2022.[9]

As seen in **Table 4.3-2**, the Proposed Project's estimated electrical consumption would be reduced through the incorporation of multiple Project design features, which would increase the overall energy efficiency of the new buildings on the HMNH campus. Through exceeding Title 24 requirements and installing high-efficiency lighting, low-flow bathroom faucets, low-flow kitchen faucets, low-flow toilets, and water-efficient irrigation systems, an estimated 606,651 kilowatt hours (kWh) would be saved per year.

Table 4.3-2
Summary of Electricity Use During Project Operation

	Quantity (kWh/yr)
No Efficiency Project Design Features Incorporated	
PS-4	684,448
Inpatient Building No. 2/Diagnostic and Treatment Building	4,564,000
Water Conveyance	290,607
Total without PDFs	**5,539,055**
Efficiency Project Design Features Incorporated	
PS-4	590,015
Inpatient Building No. 2/Diagnostic and Treatment Building	4,092,700
Water Conveyance	249,689
Total with PDFs	**4,932,404**

Source: Appendix A of the Air Quality and Greenhouse Gas Emissions Analysis Technical Report, found in Appendix B of this Draft SEIR.
Notes: CalEEMod's default energy consumption for water conveyance is 0.009727 kWh/gallon. PDFs = Project Design Features

[8] California Energy Commission, 2017 Power Content Label: Southern California Edison, July 2018.

[9] Southern California Edison, Southern California Edison Company's 2018 Final Renewables Portfolio Standard Procurement Plan, April 2, 2019.

SCE is projected to have demand ranging from 100,000 to 110,000 gigawatt hours (GWh) per year.[10] The operation of the Proposed Project would comprise 0.0045 percent of SCE's projected demand for the operational year, and, as shown in **Table 4.3-1**, it would represent 0.0073 percent of the electricity demand in Los Angeles County. With the Project's compliance with State and local regulations and SCE's compliance with RPS goals, the Project would not use electricity obtained through nonrenewable resources in a wasteful or inefficient manner and would have a less-than-significant impact related to this issue.

Natural Gas

Natural gas would be used throughout the operation of the Proposed Project. As mentioned previously, the Proposed Project would comply with the 2019 Title 24 standards, including from the California Energy Code and the CALGreen Code. Additionally, SoCalGas is developing projects to produce renewable natural gas. As these technologies continue to develop, the use of nonrenewable natural resources to produce natural gas will decrease even further. **Table 4.3-3** shows the reduction in natural gas consumption that would occur with the incorporation of these design features.

Table 4.3-3
Summary of Natural Gas Use During Project Operation

Location	Quantity (in Mcf/yr)
No Efficiency Project Design Features Incorporated	
PS-4	0
Inpatient Building No. 2/Diagnostic and Treatment Building	12,502
Total without PDFs	**12,502**
Efficiency Project Design Features Incorporated	
PS-4	0
Inpatient Building No. 2/Diagnostic and Treatment Building	11,972
Total with PDFs	**11,972**

Source: Appendix A of the Air Quality and Greenhouse Gas Emissions Analysis Technical Report, found in Appendix B of this Draft SEIR.
Notes: Conversion from kBTU/yr (as provided in CalEEMod) to Mcf/yr were done using a conversion factor obtained from the U.S. Energy Information Administration, available at: https://www.eia.gov/tools/faqs/faq.php?id=45&t=8.
PDFs = Project Design Features

SoCalGas is forecasted to have a natural gas demand ranging between 7,500 therms and 7,900 therms in 2022 (732,000,000 Mcf and 771,000,000 Mcf, respectively).[11] The operation of the Proposed Project would comprise approximately 0.0016 percent of SoCalGas's projected demand for the operational year of 2022. Further, the Project would comprise 0.0042 percent of the natural gas demand in Los Angeles County (see **Table 4.3-1**). In complying with the California Title 24 standards, the Project would not use natural gas in an inefficient or wasteful manner. Therefore, the Project would have a less-than-significant impact related to the wasteful or inefficient consumption of natural gas.

The Proposed Project would not use energy resources or nonrenewable resources inefficiently or wastefully. The Project would comply with all State and local regulations concerning energy conservation. Each aspect of this Project would efficiently utilize nonrenewable resources.

[10] California Energy Commission, California Energy Demand 2018-2030 Revised Forecast, February 2018.

[11] Ibid.

Therefore, impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation would be less than significant.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

The 2008 Master Plan EIR indicated compliance with all State and local plans for renewable energy and energy efficiency. Similarly, the Proposed Project would also comply with all State and local regulations concerning energy conservation, which have become more stringent when compared to those regulations effective in 2008. As a result, the Proposed Project would not result in new impacts that were not previously disclosed in the 2008 Master Plan EIR and would not result in inefficient, wasteful, or unnecessary consumption of energy resources.

Mitigation Measures

Impacts related to the inefficient, wasteful, or unnecessary consumption of energy resources were determined to be less than significant. Therefore, no mitigation measures would be required.

Level of Significance After Mitigation

Impacts related to the inefficient, wasteful, or unnecessary consumption of energy resources were determined to be less than significant without mitigation.

Threshold (b): Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The Proposed Project is designed in a manner that is consistent with adopted energy conservation plans. It would comply with California's Title 24 Parts 6 and 11, which encourage energy efficiency and sustainable buildings, especially in new construction. The Project would also involve retrofitting the Main Hospital Building, where new equipment, plumbing, and wiring would all comply with Title 24, resulting in increased energy efficiency. Accordingly, the Project would not conflict with any adopted energy conservation plans, including those that address renewable energy and energy efficiency.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

The 2008 Master Plan EIR indicated compliance with all State and local plans for renewable energy and energy efficiency. Similarly, the Proposed Project would also comply with all State and local regulations concerning energy conservation, which have become more stringent when compared to those regulations effective in 2008. Therefore, the Proposed Project would not result in new impacts that were not previously disclosed in the 2008 Master Plan EIR and would be in compliance with all State and local plans for renewable energy and energy efficiency.

Mitigation Measures

Impacts related to the conflict with or obstruction of a State or local plan for renewable energy or energy efficiency were determined to be less than significant. Therefore, no mitigation measures would be required.

Level of Significance After Mitigation

Impacts related to the conflict with or obstruction of a State or local plan for renewable energy or energy efficiency were determined to be less than significant without mitigation.

Threshold (c): Would the project require or result in the relocation or construction of new or expanded electric power or natural gas facilities, the construction or relocation of which could cause significant environmental effects?

Electricity

The Proposed Project would include connections to the existing electrical energy infrastructure that is maintained by SCE. The Project Site is part of the existing HMNH campus, which consists of hospital and medical office buildings. No major upgrades to the electrical system are anticipated due to implementation of the Proposed Project, in part because energy demands are projected to decline over the next years.[12]

Construction

The Proposed Project would use electricity during the construction phases to supply and convey water, power lighting and electronic equipment, and other miscellaneous construction activities. This electricity would be supplied by SCE through 16-kilovolt lines that run under McBean Parkway, which serve the HMNH campus. Due to the limited amount of equipment requiring electricity during construction, these lines would be sufficient to supply the needed electricity for the construction of the Proposed Project. Project construction would not require or result in the relocation or construction of new or expanded electric power facilities, and, as such, impacts to SCE's infrastructure would be less than significant.

Operation

The Project would involve the development of two new buildings on what is currently a paved parking lot (Lot D), the addition of three aboveground parking stories (four levels, including rooftop parking) to the existing PS-4 parking structure, and retrofitting of the Main Hospital Building. The Proposed Project is estimated to use 5.54 GWh per year.[13] This includes the operational usage of PS-4, the D&T Building, and IP-2 Building, as well as water conveyance to the Project. This estimate is considered to be conservative because it does not take into account the reduced demand on electricity resulting from the Project's compliance and exceedance of Title 24, the City Energy Conservation Code, and the installation of high-efficiency lighting. When these Project design features are taken into consideration, the Project is estimated to use 4.93 GWh per year.

Overall, SCE is projected to have demand ranging from 100,000 GWh to just over 110,000 GWh in the year 2022.[14] The Proposed Project's estimated demand is 4.93 GWh per year. This results in the Proposed Project comprising between 0.0045 and 0.0049 percent of the demand for SCE. When combined with the usage already established in the 2008 Master Plan EIR, the total electricity demand from the HMNH campus would be approximately 19.41 GWh per year. The percentage of SCE's electricity demand for the Project and the HMNH campus combined would range from 0.0176 to 0.0194 percent.

The electricity demand would be further reduced when the change in use of the Main Hospital Building is taken into consideration. The area within the Main Hospital Building that contains the 92

[12] California Energy Commission, California Energy Demand 2018-2030 Revised Forecast, February 2018.

[13] Dudek, Air Quality and Greenhouse Gas Emissions Analysis Technical Report, Appendix A, 2019, see Appendix B of this Draft SEIR.

[14] California Energy Commission, California Energy Demand 2018-2030 Revised Forecast, February 2018.

beds and the diagnostic and treatment facilities would be converted to a mixture of office uses, administrative uses, and/or clinical/hospital support services. For a complete list of square footage for these uses, see Chapter 3 of this Draft SEIR. The construction of the D&T Building and IP-2 Building would allow for the Main Hospital Building to expand the space currently in use for procedure rooms, imaging facilities, and magnetic resonance imaging (MRIs), all of which currently do not have sufficient space. These uses would continue to operate at the same intensity but would occupy substantially more square footage than the current layout of the Main Hospital Building. In addition to this change, the Main Hospital Building would be retrofitted for the new use and would be required to meet Title 24 and local regulations concerning energy efficiency. This would further reduce the estimated electricity usage beyond that calculated above. Due to the reduced intensity and compliance with State and local ordinances, the electricity consumption of the Main Hospital Building would be significantly reduced from the 2008 Master Plan calculation, which would result in electricity usage at the HMNH campus to be less than the 0.0176 to 0.0194 percent estimated above.

The Proposed Project's electricity demand is not substantial enough to require an expanded or new electricity infrastructure. Additionally, the Project would not require any substantial alterations on the part of SCE. The existing 16-kilovolt lines on McBean Parkway would be sufficient to supply the Proposed Project as they already provide electricity to the remaining HMNH campus. Accordingly, the Project would not have a significant impact related to the operational electrical demand.

Natural Gas

The Proposed Project would include connections to the existing natural gas infrastructure that is maintained by SoCalGas. The Project Site is part of the existing HMNH campus, which consists of hospital and medical office buildings. No major upgrades to the natural gas system are anticipated due to implementation of the Proposed Project, in part because energy demands are projected to decline over the next years.[15]

Construction

Construction would not involve the use of natural gas and would, therefore, have no impact on the supply of natural gas for SoCalGas. The only impacts associated with natural gas due to construction would involve trenching required to connect the proposed buildings to the 6-inch medium pressure natural gas main in McBean Parkway on both sides of the HMNH campus and/or a 4-inch medium pressure natural gas main in Orchard Village Road, which terminates at McBean Parkway. Because these lines already exist, the impact to the infrastructure due to construction of the Proposed Project would be less than significant.

Operation

The Proposed Project consists of two new buildings on what is currently a paved parking lot (Lot D), the addition of three aboveground parking stories (four levels, including rooftop parking) to the existing PS-4 parking structure, and retrofitting of the Main Hospital Building.

[15] California Energy Commission. California Energy Demand 2018-2030 Revised Forecast, February 2018.

The Project is estimated to use 12,502 Mcf/yr[16] if the Project's compliance with and exceedance of Title 24 and the City Energy Conservation Code are not taken into consideration.[17] To arrive at a conservative estimate, this 12,502 Mcf/yr can be added to the usage of 38,448 Mcf/yr previously established in the 2008 Master Plan EIR. This would result in a total natural gas consumption of 50,950 Mcf/yr. According to the CEC, SoCalGas is forecasted to have a natural gas demand ranging between 7,500 therms and 7,900 therms in 2022 (732,000,000 Mcf and 771,000,000 Mcf, respectively).[18] Thus, the most conservative estimates place the Proposed Project as accounting for between 0.0016 and 0.0017 percent of SoCalGas's overall natural gas demand. Combining the current natural gas demand on the HMNH campus and the Proposed Project would result in the HMNH campus accounting for between 0.0066 and 0.0070 percent of SoCalGas's overall natural gas demand. These percentages are not significant and would not require any new systems or supplies of natural gas or the alteration of any natural gas utilities.

This evaluation is considered conservative for several reasons. Primary among these is the implementation of the City Energy Conservation Code. The City Energy Conservation Code reduces the wasteful use of energy by increasing efficiency in new buildings. To account for the increased efficiency, CalEEMod provides a mitigated project estimation. This estimation reduces the Proposed Project's natural gas consumption from 12,502 Mcf/yr to 11,972 Mcf/yr. This measurement combined with the current natural gas demand on the HMNH campus would result in the HMNH campus accounting for between 0.0066 and 0.0069 percent of SoCalGas's overall natural gas demand.

Additionally, the Main Hospital Building is being converted to a mix of office uses, administrative uses, and/or clinical/hospital support services. For a complete list of square footage for these uses, see Chapter 3 of this Draft SEIR. The construction of the D&T Building and IP-2 Building would allow for the Main Hospital Building to expand the space currently in use for procedure rooms, imaging facilities, and MRIs, all of which currently do not have sufficient space in the Main Hospital Building. The conversion of the Main Hospital Building would reduce its usage of natural gas. The amount of natural gas used for administrative offices and the other new uses would be much less than the current consumption associated with the beds occupied by patients (for heating and meal provisions). In addition, the Main Hospital Building would be retrofitted for the new use and would be required to meet Title 24 and local regulations concerning energy efficiency. This would further reduce the estimated natural gas usage beyond that calculated above.

In even the most conservative of estimates, the Proposed Project's demand for natural gas would not require additional infrastructure, supplies, or adjustments to SoCalGas. The existing natural gas lines on McBean Parkway and Orchard Village Road would be sufficient to supply the HMNH campus. Therefore, the Proposed Project would have a less-than-significant impact on the existing natural gas infrastructure and supply.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

The 2008 Master Plan EIR indicated compliance with all State and local plans for renewable energy and energy efficiency. Similarly, the Proposed Project would also comply with all State and

[16] This unit is in thousand cubic feet. 12,502 Mcf/yr is the equivalent of 12.5 billion cubic feet per year.

[17] Dudek, Air Quality and Greenhouse Gas Emissions Analysis Technical Report, Appendix A, 2019, see Appendix B of this Draft SEIR.

[18] California Energy Commission, California Energy Demand 2018-2030 Revised Forecast, February 2018.

local regulations concerning energy conservation, which have become more stringent when compared to those regulations effective in 2008. As a result, the Proposed Project would not result in new impacts that were not previously disclosed in the 2008 Master Plan EIR and would not result or require the construction of new or expanded electric power or natural gas facilities, which could cause significant environmental effects.

Mitigation Measures

Impacts related to the construction of new or expanded electric power or natural gas facilities were determined to be less than significant. Therefore, no mitigation measures would be required.

Level of Significance After Mitigation

Impacts related to the relocation or construction of new or expanded electric power or natural gas facilities were determined to be less than significant without mitigation.

4.3.4. CUMULATIVE IMPACTS

Impacts associated with energy consumption vary depending on the type and scale of an individual project and are, therefore, analyzed on a project-by-project basis. As identified above, the Proposed Project would result in an increase in energy usage associated with electricity consumption during Project construction and operation and natural gas consumption during Project operation only. However, these increases represent a very small percentage of SCE's and SoCalGas's projected demand for the Project's operational year of 2022.

The impact analysis of the Proposed Project determined that the increase in electricity and natural gas consumption would be negligible and would not result in a substantial increase in demand on regional energy supply requiring significant additional capacity. Further, the analysis determined that energy consumption is restricted by existing regulations governing building energy efficiency. In addition, SCE is subject to California's RPS, which requires SCE to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020, to 50 percent of total procurement by 2026, and 60 percent by 2030 and 100% by 2045.

Similar to the Proposed Project, the projects listed in **Table 4-1** in Chapter 4, Environmental Analysis, of this Draft SEIR, would result in increases in overall energy consumption during both construction and operation activities. These projects would also be required to comply with Title 24 Part 6 of the California Building Code, with any low-scale residential projects subject to requirements mandating installation of photovoltaic solar panel systems. Further, requirements for SCE to procure a greater percentage of renewable energy sources would result in a decreased use of finite energy resources. Therefore, because projects identified in **Table 4-1** would be required to comply with energy efficiency standards, such as the California Building Code, and because contractors and building owners would be strongly incentivized to avoid wasteful, inefficient, and unnecessary consumption of energy during construction and operation, the impacts of the projects listed in **Table 4-1**, when combined with the impacts of the Proposed Project, would not result in a significant cumulative impact to energy resources.

This section of the Draft SEIR analyzes the potential impacts related to greenhouse gas (GHG) emissions caused by the construction and operation of the Proposed Project. A Greenhouse Gas Emissions Analysis Technical Report was prepared by Dudek for the Proposed Project in February 2020, which is included in **Appendix B** of this Draft SEIR.[1] A discussion of the environmental setting, regulatory framework, and the Project's impact and any necessary mitigation measures is provided below.

4.4.1. ENVIRONMENTAL SETTING

CLIMATE CHANGE OVERVIEW

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period of time (decades or longer). Earth's temperature depends on the balance between energy entering and leaving the planet's system. Many factors, both natural and human, can cause changes in Earth's energy balance, including variations in the sun's energy reaching Earth, changes in the reflectivity of Earth's atmosphere and surface, and changes in the greenhouse effect, which affects the amount of heat retained by Earth's atmosphere.

The greenhouse effect is the trapping and buildup of heat in the atmosphere (troposphere) near Earth's surface. The greenhouse effect traps heat in the troposphere through a threefold process as follows: short-wave radiation emitted by the sun is absorbed by Earth, Earth emits a portion of this energy in the form of long-wave radiation, and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and toward Earth. The greenhouse effect is a natural process that contributes to regulating Earth's temperature and creates a pleasant, livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing Earth's surface temperature to rise.

The scientific record of Earth's climate shows that the climate system varies naturally over a wide range of time scales and that, in general, climate changes prior to the Industrial Revolution in the 1700s can be explained by natural causes, such as changes in solar energy, volcanic eruptions, and natural changes in GHG concentrations. However, recent climate changes, particularly the warming observed over the past century, cannot be explained by natural causes alone. Rather, it is extremely likely that human activities have been the dominant cause of that warming since the mid-twentieth century and is the most significant driver of observed climate change.[2] Human influence on the climate system is evident from the increasing GHG concentrations in the atmosphere, positive radiative forcing (i.e., Earth receives more incoming energy from sunlight than it radiates into space), observed warming, and improved understanding of the climate system. The atmospheric concentrations of GHGs have increased to levels unprecedented in the last 800,000 years, primarily from fossil fuel emissions and secondarily from emissions associated with land use changes.[3] Continued emissions of GHGs will cause further warming and changes in all components of the climate system.

[1] Dudek, Air Quality and Greenhouse Gas Emissions Analysis Technical Report for the Henry Mayo Newhall Hospital Expansion Project, February 2020.

[2] IPCC, Climate Change 2014 Synthesis Report: A Report of the Intergovernmental Panel on Climate Change, 2014.

[3] Ibid.

GREENHOUSE GASES

GHG is any gas that absorbs infrared radiation in the atmosphere (i.e., GHGs trap heat in the atmosphere). As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the State's primary GHG emissions reduction programs, GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3). Some GHGs, such as CO_2, CH_4, and N_2O, occur naturally and are emitted into the atmosphere through natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat-absorption potential than CO_2, include fluorinated gases, such as HFCs, PFCs, and SF_6, which are associated with certain industrial products and processes. The following paragraphs summarize the most common GHGs and their sources.[4]

Carbon Dioxide. CO_2 is a naturally occurring gas and a by-product of human activities and is the principal anthropogenic GHG that affects Earth's radiative balance. Natural sources of CO_2 include respiration of bacteria, plants, animals, and fungus; evaporation from oceans; volcanic out-gassing; and decomposition of dead organic matter. Human activities that generate CO_2 are from the combustion of fuels, such as coal, oil, natural gas, and wood, and changes in land use.

Methane. CH_4 is produced through both natural and human activities. CH_4 is a flammable gas and is the main component of natural gas. CH_4 is produced through anaerobic (without oxygen) decomposition of waste in landfills, flooded rice fields, animal digestion, decomposition of animal wastes, production and distribution of natural gas and petroleum, coal production, and incomplete fossil fuel combustion.

Nitrous Oxide. N_2O is produced through natural and human activities, mainly through agricultural activities and natural biological processes, although fuel burning and other processes also create N_2O. Sources of N_2O include soil cultivation practices (microbial processes in soil and water), especially the use of commercial and organic fertilizers, manure management, industrial processes (such as in nitric acid production, nylon production, and fossil fuel-fired power plants), vehicle emissions, and using N_2O as a propellant (such as in rockets, race cars, and aerosol sprays).

Fluorinated Gases. Fluorinated gases (also referred to as F-gases) are synthetic powerful GHGs emitted from many industrial processes. Fluorinated gases are commonly used as substitutes for stratospheric ozone-depleting substances (e.g., CFCs, hydrochlorofluorocarbons [HCFCs], and halons). The most prevalent fluorinated gases include the following:

- **Hydrofluorocarbons:** HFCs are compounds containing only hydrogen, fluorine, and carbon atoms. HFCs are synthetic chemicals used as alternatives to ozone-depleting substances in serving many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are used in manufacturing.
- **Perfluorocarbons:** PFCs are a group of human-made chemicals composed of carbon and fluorine only. These chemicals were introduced as alternatives, with HFCs, to the ozone

[4] The descriptions of GHGs are summarized from the Intergovernmental Panel on Climate Change (IPCC) Second Assessment Report (1995), IPCC Fourth Assessment Report (2007), CARB's "Glossary of Terms Used in GHG Inventories" (2015), and USEPA's "Glossary of Climate Change Terms" (2016).

depleting substances. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Since PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere, these chemicals have long lifetimes, ranging between 10,000 and 50,000 years.

- **Sulfur Hexafluoride**: SF_6 is a colorless gas soluble in alcohol and ether and slightly soluble in water. SF6 is used for insulation in electric power transmission and distribution equipment, semiconductor manufacturing, and the magnesium industry, and as a tracer gas for leak detection.
- Nitrogen Trifluoride: NF3 is used in the manufacture of a variety of electronics, including semiconductors and flat panel displays.

GLOBAL WARMING POTENTIAL

Gases in the atmosphere can contribute to climate change both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of Earth (e.g., affecting cloud formation or albedo [i.e., how well a surface reflects solar energy]). The Intergovernmental Panel on Climate Change (IPCC) developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. GWP is a measure of how much energy the emissions of 1 ton of a gas will absorb over a given period of time relative to the emissions of 1 ton of CO_2. Therefore, GWP-weighted emissions are measured in metric tons of CO_2 equivalent (MT CO_2e). The current version of CalEEMod (version 2016.3.2) assumes that the GWP for CH_4 is 25 (i.e., emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the IPCC Fourth Assessment Report.[5]

CLIMATE CHANGE CONDITIONS AND INVENTORIES

Sources of Greenhouse Gas Emissions

According to the U.S. Environmental Protection Agency (USEPA), total U.S. GHG emissions were approximately 6,456.7 million metric tons (MMT) CO_2e in 2017.[6] The primary GHG emitted by human activities in the U.S. was CO_2, which represented approximately 81.6 percent of total GHG emissions (5,270.7 MMT CO_2e). The largest source of CO_2, and of overall GHG emissions, was fossil-fuel combustion, which accounted for approximately 93.3 percent of CO_2 emissions in 2017 (4,912.0 MMT CO_2e). Relative to 1990, gross U.S. GHG emissions in 2017 are higher by 1.3 percent, down from a high of 15.7 percent above 1990 levels in 2007. GHG emissions decreased from 2016 to 2017 by 0.006 percent (35 MMT CO_2e) and overall, net emissions in 2017 were 13.0 percent below 2005 levels.[7]

According to California's 2000–2016 GHG emissions inventory, California emitted 429 MMT CO_2e in 2017.[8] The sources of GHG emissions in California include transportation, industrial uses, electric

[5] IPCC, Fourth Assessment Synthesis of Scientific-Technical Information Relevant to Interpreting Article 2 of the U.N. Framework Convention on Climate Change, 2007.

[6] USEPA. Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2017, 2019.

[7] Ibid.

[8] CARB, California Greenhouse Gas Emissions for 2000-2017: Trends of Emissions and Other Indicators, 2019.

power production from both in-state and out-of-state sources, commercial and residential uses, agriculture, high GWP substances, and recycling and waste. The California GHG emission source categories (as defined in the California Air Resources Board's [CARB] 2008 Scoping Plan) and their relative contributions in 2016 are presented in **Table 4.4-1**, below.

Table 4.4-1
GHG Emissions Sources in California

Source Category	Annual GHG Emissions (MMT CO_2e)	Percent of Total[A]
Transportation	169.38	39%
Industrial[b]	89.61	21%
Electric power[c]	68.58	16%
Commercial and residential	39.36	9%
Agriculture	33.84	8%
High global-warming potential substances	19.78	5%
Recycling and waste	8.81	2%
Total	**429.40**	**100%**

Source: CARB, California Greenhouse Gas Inventory for 2000–2016 by Category as Defined in the 2008 Scoping Plan, 2018.
Notes: Emissions reflect the 2015 California GHG inventory. MMT CO2e = million metric tons of carbon dioxide equivalent per year
[a] Percentage of total has been rounded, and total may not sum due to rounding.
[b] The Aliso Canyon natural gas leak event released 1.96 MMT CO2e of unanticipated emissions in 2015 and 0.52 MMT CO2e in 2016. These leak emissions will be fully mitigated according to legal settlement and are tracked separately from routine inventory emissions.
[c] Includes emissions associated with imported electricity, which account for 33.74 MMT CO2e annually.

During the 2000 to 2016 period, per capita GHG emissions in California continued to drop from a peak in 2001 of 14.0 MT CO_2e per person to 10.8 MT CO_2e per person in 2016, representing a 23 percent decrease. In addition, total GHG emissions in 2016 were approximately 12 MMT CO_2e less than 2015 emissions. The declining trend in GHG emissions, coupled with programs that will continue to help reduce GHG emissions going forward, demonstrates that California will continue to reduce emissions below the Statewide 2020 reduction target of 431 MT CO_2e.[9]

Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources through uncertain impacts related to future air temperatures and precipitation patterns. The 2014 IPCC Synthesis Report indicated that warming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia. Signs that global climate change has occurred include warming of the atmosphere and ocean, diminished amounts of snow and ice, and rising sea levels.[10]

In California, climate change impacts have the potential to affect sea level rise, agriculture, snowpack and water supply, forestry, wildfire risk, public health, and electricity demand and supply.[11] The primary effect of global climate change has been a 0.2°C (0.36°F) rise in average global tropospheric temperature per decade, determined from meteorological measurements

[9] CARB, California Greenhouse Gas Inventory for 2000–2016 by Category as Defined in the 2008 Scoping Plan, June 2018.

[10] IPCC, Climate Change 2014 Synthesis Report: A Report of the Intergovernmental Panel on Climate Change, Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, 2017.

[11] CCCC (California Climate Change Center), Our Changing Climate: Assessing the Risks to California. CEC-500-2006-077, July 2006.

worldwide between 1990 and 2005. Scientific modeling predicts that continued emissions of GHGs at or above current rates would induce more extreme climate changes during the twenty-first century than were observed during the twentieth century. A warming of about 0.2°C (0.36°F) per decade is projected, and there are identifiable signs that global warming could be taking place.

Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. A scientific consensus confirms that climate change is already affecting California. The average temperatures in California have increased, leading to more extreme hot days and fewer cold nights. Shifts in the water cycle have been observed, with less winter precipitation falling as snow and both snowmelt and rainwater running off earlier in the year. Sea levels have risen, and wildland fires are becoming more frequent and intense due to dry seasons that start earlier and end later.[12]

An increase in annual average temperature is a reasonably foreseeable effect of climate change. Observed changes over the last several decades across the western U.S. reveal clear signals of climate change. Statewide average temperatures increased by about 1.7°F from 1895 to 2011, and warming has been greatest in the Sierra Nevada.[13] By 2050, California is projected to warm by approximately 2.7°F above 2000 averages, a threefold increase in the rate of warming over the last century. By 2100, average temperatures could increase by 4.1°F to 8.6°F, depending on emissions levels. Springtime warming—a critical influence on snowmelt—will be particularly pronounced. Summer temperatures will rise more than winter temperatures, and the increases will be greater in inland California, compared to the coast. Heat waves will be more frequent, hotter, and longer. There will be fewer extremely cold nights.[14] The Sierra Nevada snowpack, which accounts for approximately half of the surface water storage in California, is predicted to decline by 30 percent to as much as 90 percent over the next 100 years.[15]

Model projections for precipitation over California continue to show the Mediterranean pattern of wet winters and dry summers with seasonal, year-to-year, and decade-to-decade variability. For the first time, however, several of the improved climate models shift toward drier conditions by the mid-to-late twenty-first century in Central California and, most notably, Southern California. By the late century, all projections show drying, and half of them suggest 30-year average precipitation will decline by more than 10 percent below the historical average.[16]

A summary of current and future climate change impacts to resource areas in California is provided below.[17]

Agriculture

Some of the specific challenges faced by the agricultural sector and farmers include more drastic and unpredictable precipitation and weather patterns; extreme weather events that range from

[12] CAT (California Climate Action Team), Climate Action Team Biennial Report. Sacramento, California, April 2010.

[13] CCCC, Our Changing Climate 2012: Vulnerability & Adaptation to the Increasing Risks from Climate Change in California, July 2012.

[14] Ibid.

[15] CAT, Climate Action Team Report to the Governor Schwarzenegger and the Legislature, 2006.

[16] CCCC, Our Changing Climate 2012: Vulnerability & Adaptation to the Increasing Risks from Climate Change in California, July 2012.

[17] CNRA (California Natural Resources Agency), Safeguarding California: Reducing Climate Risk; An update to the 2009 California Climate Adaptation Strategy, July 2014.

severe flooding to extreme drought, to destructive storm events; significant shifts in water availability and water quality; changes in pollinator life cycles; temperature fluctuations, including extreme heat stress and decreased chill hours; increased risks from invasive species and weeds, agricultural pests, and plant diseases; and disruptions to the transportation and energy infrastructure supporting agricultural production.

Biodiversity and Habitat

Specific climate change challenges to biodiversity and habitat include species migration in response to climatic changes, range shift, and novel combinations of species; pathogens, parasites, and disease; invasive species; extinction risks; changes in the timing of seasonal life-cycle events; food web disruptions; and threshold effects (i.e., a change in the ecosystem that results in a "tipping point" beyond which irreversible damage or loss has occurs).

Energy

Specific climate change challenges for the energy sector include temperature, fluctuating precipitation patterns, increasing extreme weather events, and sea level rise.

Forestry

The most significant climate change-related risk to forests is accelerated risk of wildfire and more frequent and severe droughts. Droughts have resulted in more large-scale mortalities and combined with increasing temperatures have led to an overall increase in wildfire risks. Increased wildfire intensity subsequently increases public safety risks, property damage, fire suppression and emergency response costs, watershed and water quality impacts, and vegetation conversions.

Ocean and Coastal Ecosystems and Resources

Sea level rise, changing ocean conditions, and other climate change stressors are likely to exacerbate long-standing challenges related to ocean and coastal ecosystems in addition to threatening people and infrastructure along the California coastline and in coastal communities. Sea level rise, in addition to more frequent and severe coastal storms and erosion, are threatening vital infrastructure, such as roads, bridges, power plants, ports and airports, gasoline pipes, and emergency facilities, as well as negatively impacting coastal recreational assets, such as beaches and tidal wetlands.

Public Health

Climate change can impact public health through various environmental changes and is the largest threat to human health in the twenty-first century. Changes in precipitation patterns affect public health primarily through potential for altered water supplies, and extreme events, such as heat, floods, droughts, and wildfires. Increased frequency, intensity, and duration of extreme heat and heat waves are likely to increase the risk of mortality due to heat-related illness, as well as exacerbate existing chronic health conditions. Other extreme weather events are likely to negatively impact air quality and increase or intensify respiratory illness, such as asthma and allergies.

Transportation

While the transportation industry is a source of GHG emissions, it is also vulnerable to climate change risks. Increasing temperatures and extended periods of extreme heat threaten the

integrity of the roadways and rail lines. High temperatures cause the road surfaces to expand, which leads to increased pressure and pavement buckling. High temperatures can also cause rail breakages, which could lead to train derailment. Other forms of extreme weather events, such as extreme storm events, can negatively impact infrastructure, which can impair movement of peoples and goods or potentially block evacuation routes and emergency access roads. Increased wildfires, flooding, erosion risks, landslides, mudslides, and rockslides can all profoundly impact the transportation system and pose a serious risk to public safety.

Water

Climate change could seriously impact the timing, form, amount of precipitation, runoff patterns, and frequency and severity of precipitation events. Higher temperatures reduce the amount of snowpack and lead to earlier snowmelt, which can impact water supply availability, natural ecosystems, and winter recreation. Water supply availability during the intense dry summer months is heavily dependent on the snowpack accumulated during the winter time. Increased risk of flooding has a variety of public health concerns, including water quality, public safety, property damage, displacement, and post-disaster mental health problems. Prolonged and intensified droughts can also negatively affect groundwater reserves and result in increased overdraft and subsidence. The higher risk of wildfires can lead to increased erosion, which can negatively impact watersheds and result in poor water quality.

4.4.2. REGULATORY FRAMEWORK

FEDERAL

Clean Air Act

On April 2, 2007, in *Massachusetts v. EPA*, the Supreme Court directed the USEPA administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare or whether the science is too uncertain to make a reasoned decision. In making these decisions, the USEPA administrator was required to follow the language of Section 202(a) of the federal Clean Air Act. On December 7, 2009, the administrator signed a final rule with two distinct findings regarding GHGs under Section 202(a) that elevated concentrations of GHGs—CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6—in the atmosphere threaten the public health and welfare of current and future generations and that the combined emissions of these GHGs from new motor vehicles and new motor vehicle engines contribute to the air pollution that endangers public health and welfare. These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the Clean Air Act.

Energy Independence and Security Act

On December 19, 2007, President George W. Bush signed the Energy Independence and Security Act of 2007. Among other key measures, the act required increasing the supply of alternative fuel sources, setting a target of 35 miles per gallon, and revising standards for energy efficiency of heating and cooling products, which would aid in the reduction of national GHG emissions.

Federal Vehicle Standards

In response to the *Massachusetts v. EPA* U.S. Supreme Court ruling, the George W. Bush administration issued Executive Order 13432 in 2007 directing the USEPA, the Department of

Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2010, the USEPA and National Highway Traffic Safety Administration (NHTSA) issued a final rule regulating cars and light-duty trucks and regulating fuel efficiency and GHG emissions for model years 2012 to 2016. In 2011, the USEPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program.

STATE

Executive Order S-3-05

Executive Order (EO) S-3-05 established the following Statewide goals: GHG emissions should be reduced to 2000 levels by 2010, GHG emissions should be reduced to 1990 levels by 2020, and GHG emissions should be reduced to 80 percent below 1990 levels by 2050.

Assembly Bill 32 (California Global Warming Solutions Act of 2006) and CARB's Climate Change Scoping Plan

In furtherance of the goals established in EO S-3-05, the legislature enacted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. Under AB 32, CARB must adopt regulations requiring the reporting and verification of Statewide GHG emissions from specified sources, as well as rules and regulations to achieve feasible and cost-effective GHG emission reductions. CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.

In 2007, CARB approved a limit on the Statewide GHG emissions level for year 2020 consistent with the determined 1990 baseline (427 MMT CO2e). In 2008, CARB adopted the *Climate Change Scoping Plan: A Framework for Change* (Scoping Plan) in accordance with Health and Safety Code Section 38561. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions for various emissions sources/sectors to 1990 levels by 2020. CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of approximately 28.5 percent from the projected 2020 emissions level. In 2014, CARB recalculated the State's 1990 emissions level using more recent global warming potentials identified by the IPCC and determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of approximately 15 percent (instead of 28.5 percent as identified in the 2008 Scoping Plan or 16 percent as identified in the 2011 Final Supplement to the Scoping Plan's Functional Equivalent Document) from the projected 2020 emissions level.

Executive Order B-30-15

EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing Statewide GHG emissions to 40 percent below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing Statewide GHG emissions to 80 percent

below 1990 levels by 2050 as set forth in S-3-05. EO B-30-15 does not require local agencies to take any action to meet the new interim GHG reduction target.

Senate Bill 32 and Assembly Bill 197

SB 32 and AB 197 (enacted in 2016) are companion bills that set a new Statewide GHG reduction targets; make changes to CARB's membership and increase legislative oversight of CARB's climate change-based activities; and expand dissemination of GHG and other air quality-related emissions data to enhance transparency and accountability. More specifically, SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that Statewide GHG emissions are reduced to 40 percent below 1990 levels by 2030. AB 197 required CARB to make available and update emissions data for GHGs, criteria air pollutants, and toxic air contaminants from reporting facilities and to identify specific information for GHG emissions reduction measures when updating the Scoping Plan.

Senate Bill 605 and Senate Bill 1383

SB 605 (2014) required CARB to complete a comprehensive strategy to reduce emissions of short-lived climate pollutants in the State; and SB 1383 (2016) required CARB to approve and implement that strategy by January 1, 2018. SB 1383 also established specific targets for the reduction of short-lived climate pollutants (40 percent below 2013 levels by 2030 for methane and HFCs, and 50 percent below 2013 levels by 2030 for anthropogenic black carbon) and provides direction for reductions from dairy and livestock operations and landfills.

California Code of Regulations Building Standards Code (Title 24, Part 6 and Part 11)

Title 24 of the California Code of Regulations (CCR) was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically establishes Building Energy Efficiency Standards that are designed to ensure that new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. The California Energy Commission (CEC) is required by law to adopt standards every three years that are cost effective for homeowners over the 30-year lifespan of a building.

In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as CALGreen and establishes minimum mandatory standards as well as voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and were updated in January 2017. The mandatory standards require reduction in indoor water use, outdoor water use, and construction and demolition waste; inspections of energy systems; inclusion of electric vehicle charging stations; and the use low-pollutant emitting exterior and interior finish materials.

The California Public Utilities Commission (CPUC), CEC, and CARB also have a shared, established goal of achieving zero net energy (ZNE) for new construction in California. The key policy timelines

include: (1) all new residential construction in California will be ZNE by 2020, and (2) all new commercial construction in California will be ZNE by 2030.[18]

Public Safety (Title 20)

CCR Title 20 requires manufacturers of appliances to meet State and federal standards for energy and water efficiency. Performance of appliances must be certified through the CEC to demonstrate compliance with standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwaters; clothes washers and dryers; cooking products; electric motors; low voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems.

Senate Bill 1

SB 1 (2006) established a $3 billion rebate program to support the goal of the State to install rooftop solar energy systems with a generation capacity of 3,000 megawatts through 2016. SB 1 added sections to the Public Resources Code, including Chapter 8.8 (California Solar Initiative), that require building projects applying for ratepayer-funded incentives for photovoltaic systems to meet minimum energy efficiency levels and performance requirements.

Assembly Bill 1470

AB 1470 established the Solar Water Heating and Efficiency Act of 2007. The bill makes findings and declarations of the legislature relating to the promotion of solar water heating systems and other technologies that reduce natural gas demand.

Assembly Bill 1109

AB 1109 required the CEC to adopt minimum energy efficiency standards for general purpose lighting, to reduce electricity consumption 50 percent for indoor residential lighting and 25 percent for indoor commercial lighting.

Assembly Bill 1493 (Pavley I Standards)

AB 1493 (2002) required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by CARB to be vehicles that are primarily used for noncommercial personal transportation in the State. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. When fully phased in, the near-term (2009–2012) standards will result in a reduction of about 22 percent in GHG emissions compared to the emissions from the 2002 fleet, while the mid-term (2013–2016) standards will result in a reduction of about 30 percent.

[18] As most recently defined by the CEC in its 2015 Integrated Energy Policy Report, a zero net energy code building is "one where the value of the energy produced by on-site renewable energy resources is equal to the value of the energy consumed annually by the building" using the CEC's time-dependent valuation metric.

Executive Order S-1-07

Issued on January 18, 2007, EO S-1-07 sets a declining Low Carbon Fuel Standard (LCFS) for GHG emissions measured in CO_2e grams per unit of fuel energy sold in California. The target of the LCFS is to reduce the carbon intensity of California passenger vehicle fuels by at least 10 percent by 2020. CARB adopted the implementing regulation in April 2009. CARB's 2017 Scoping Plan Update identified the LCFS as a regulatory measure to reduce GHG emissions to meet the 2030 emissions target. On September 27, 2018, CARB approved a rulemaking package that amended the LCFS to relax the 2020 carbon intensity reduction from 10 percent to 7.5 percent and to require a carbon intensity reduction of 20 percent by 2030.

Senate Bill 375

SB 375 (2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 required CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035. Regional metropolitan planning organizations (MPOs) are then responsible for preparing a Sustainable Communities Strategy (SCS) within their Regional Transportation Plan (RTP). The Southern California Association of Governments (SCAG) is one of Southern California's MPOs, specifically for Los Angeles County and five other counties. The goal of the SCS is to establish a forecasted development pattern for the region that, after considering transportation measures and policies, will achieve, if feasible, the GHG reduction targets. If an SCS is unable to achieve the GHG reduction target, an MPO must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

In 2010, CARB adopted the SB 375 targets for the regional MPOs. On March 22, 2018, CARB adopted the target update for the SB 375 targets, tasking SCAG to achieve an 8-percent reduction and a 19-percent reduction in emissions per capita by 2020 and 2035, respectively. The updated standards took effect in October 2018.

Advanced Clean Cars Program

In January 2012, CARB approved the Advanced Clean Cars program, a new emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package. The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars.[19] CARB estimated that in 2025 cars will emit 75 percent less smog-forming pollution than the average new car sold today. To reduce GHG emissions, CARB, in conjunction with the USEPA and the NHTSA, adopted new GHG standards for model year 2017 to 2025 vehicles; the new standards are estimated to reduce GHG emissions by 34 percent in 2025. The Zero Emissions Vehicle (ZEV) program will act as the focused technology of the Advanced Clean Cars program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles in the 2018 to 2025 model years.

While the Advanced Clean Cars program is currently in place, it is unforeseeable whether the program will remain in force for the duration of its 10-year period. In August 2018, USEPA and NHTSA

[19] CARB, Facts About the Advanced Clean Cars Program, November 2011.

published a proposal to revoke California's waiver under the Clean Air Act to establish more stringent standards. Revocation of the waiver would prohibit California from implementing some of the heightened emissions controls included in the Advanced Clean Cars program. At this time, it is unclear whether the federal government will proceed with the proposal.

Executive Order B-16-12

EO B-16-12, issued in 2012, directed State entities under the governor's direction and control to support and facilitate development and distribution of ZEVs. This EO also set a long-term target of reaching 1.5 million ZEVs on California's roadways by 2025. On a Statewide basis, EO B-16-12 also establishes a GHG emissions reduction target from the transportation sector equaling 80 percent less than 1990 levels by 2050.

Assembly Bill 1236

AB 1236, as enacted in California's Planning and Zoning Law in 2015, required local land use jurisdictions to approve applications for the installation of electric vehicle charging stations, as defined, through the issuance of specified permits unless there is substantial evidence in the record that the proposed installation would have a specific, adverse impact upon the public health or safety, and there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact. The bill provided for appeal of that decision to the planning commission, as specified. The bill requires local land use jurisdictions with a population of 200,000 or more residents to adopt an ordinance, by September 30, 2016, that creates an expedited and streamlined permitting process for electric vehicle charging stations, as specified. The City's population exceeds 200,000, so this statute applies. The streamlined permitting and inspection process for electric vehicle charging stations is detailed in Chapter 25.04 of the City's municipal code.

Senate Bill 1078

SB 1078 established the Renewables Portfolio Standard (RPS) program in 2002, which requires an annual increase in renewable generation by the utilities equivalent to at least 1 percent of sales, with an aggregate goal of 20 percent by 2017. This goal was subsequently accelerated, requiring utilities to obtain 20 percent of their power from renewable sources by 2010. Southern California Edison (SCE) has met this requirement, with 32 percent of its total power mix originating from renewable energy.[20]

Senate Bill 1368

SB 1368 required the CEC to develop and adopt regulations for GHG emission performance standards for the long-term procurement of electricity by local publicly owned utilities in 2006. These standards must be consistent with the standards adopted by the CPUC. This effort will help protect energy customers from financial risks associated with investments in carbon-intensive generation by allowing new capital investments in power plants whose GHG emissions are as low as or lower than new combined-cycle natural gas plants, by requiring imported electricity to meet GHG performance standards in California, and by requiring that the standards be developed and adopted in a public process.

[20] Southern California Edison, 2017 Power Content Label, July 2018.

Senate Bill X1 2

SB X1 2 expanded the RPS in 2011 by establishing that 20 percent of the total electricity sold to retail customers in California per year by December 31, 2013, and 33 percent by December 31, 2020, and in subsequent years be secured from qualifying renewable energy sources. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location. In addition to the retail sellers previously covered by the RPS, SB X1 2 added local, publicly owned electric utilities to the RPS. As noted above, SCE has met this requirement by including 32 percent of renewable energy in its overall portfolio of power. Further, the SCE Green Rate and SCE Green Rate options exceed this requirement by offering 66 percent and 100 percent renewable energy respectively.[21]

Senate Bill 350

SB 350, the Clean Energy and Pollution Reduction Act of 2015, further expanded the RPS by establishing that 50 percent of the total electricity sold to retail customers in California per year by December 31, 2030, be secured from qualifying renewable energy sources. In addition, SB 350 includes the goal to double the energy efficiency savings in electricity and natural gas final end uses (such as heating, cooling, lighting, or class of energy uses on which an energy-efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also required the CPUC, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal. SB 350 also established a Statewide policy for widespread electrification of the transportation sector, recognizing that such electrification is required for achievement of the State's 2030 and 2050 reduction targets (see Public Utilities Code Section 740.12).

Senate Bill 100

SB 100 increased the standards set forth in SB 350 in 2018 by establishing that 44 percent of the total electricity sold to retail customers in California per year by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, be secured from qualifying renewable energy sources. SB 100 states that it is the policy of the State that eligible renewable energy resources and zero-carbon resources supply 100 percent of the retail sales of electricity to California. This bill required that the achievement of 100 percent zero-carbon electricity resources do not increase the carbon emissions elsewhere in the western grid and that the achievement not be accomplished through resource shuffling.

Executive Order B-29-15

EO B-29-15, issued in 2015, set a goal of achieving a Statewide reduction in potable urban water usage of 25 percent relative to water use in 2013. The term of the EO extended through February 28, 2016, although many of the directives have since become permanent water-efficiency standards and requirements. The EO includes specific directives that set strict limits on water usage in the State. In response to EO B-29-15, the California Department of Water Resources modified and adopted a revised version of the Model Water Efficient Landscape Ordinance that, among

[21] Southern California Edison, 2017 Power Content Label, July 2018.

other changes, significantly increases the requirements for landscape water use efficiency and broadens its applicability to include new development projects with smaller landscape areas.

Assembly Bill 939 and Assembly Bill 341

AB 939 (1989), known as the Integrated Waste Management Act of 1989, was passed because of the increase in waste stream and the decrease in landfill capacity. The statute established the California Integrated Waste Management Board, which oversees a disposal reporting system. AB 939 set mandatory waste reduction/diversion targets for the year 2000.

AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the State that not less than 75 percent of solid waste generated be source-reduced, recycled, or composted by the year 2020, and annually thereafter.

Executive Order S-13-08

EO S-13-08, issued in 2008, seeks to enhance the State's management of climate impacts, including sea level rise, increased temperatures, shifting precipitation, and extreme weather events by facilitating the development of the State's climate adaptation strategy. To assess the State's vulnerability, the strategy summarizes key climate change impacts to the State for the following areas: agriculture, biodiversity and habitat, emergency management, energy, forestry, ocean and coastal ecosystems and resources, public health, transportation, and water (see pages 4.4-6 and 4.4-7 above for additional discussion).

LOCAL

2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

The SCAG Regional Council adopted the 2016–2040 RTP/SCS in April 2016. The 2016-2040 RTP/SCS established a development pattern for the region that, when integrated with the transportation network and other policies and measures, reduces GHG emissions from transportation (excluding goods movement). Specifically, the 2016-2040 RTP/SCS links the goals of sustaining mobility with the goals of fostering economic development; enhancing the environment; reducing energy consumption; promoting transportation-friendly development patterns; and encouraging all residents affected by socioeconomic, geographic, and commercial limitations to be provided with fair access. The current South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan is based on the SCAG 2016-2040 RTP/SCS demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry).

City of Santa Clarita Climate Action Plan

The City of Santa Clarita City Council adopted the CAP in August 2012 and certified the accompanying EIR. The CAP meets the criteria in CEQA Guidelines 15183.5(b) for a "plan to reduce GHG emissions." The CAP commits the City to reduce community-wide GHG emissions by 4 percent below 2005 levels by 2020 consistent with the California Global Warming Solutions Act of 2006 (AB 32) and the related Climate Change Scoping Plan.[22]

[22] CARB, Climate Change Scoping Plan: A Framework for Change, December 2008.

As transportation activities make up the largest sector of emissions, the CAP's GHG reductions measures are focused around causing a decrease in vehicle miles traveled in the City through development of public transits systems and other alternative transportation programs. Other reduction strategies are achieved through expansion of new and existing vegetated spaces, water reduction, energy conservation, and land use measures. These reductions are estimated to produce a 17 percent reduction below the 2020 business-as-usual (BAU) emissions forecast level outlined in the CAP. The CAP has calculated a City-specific threshold to demonstrate compliance with the CAP and AB 32 of 12 percent below BAU scenario. Therefore, if a given project meets the threshold and is consistent with the land use and zoning assumptions of the CAP, the Project would be considered consistent with the CAP.[23]

City of Santa Clarita General Plan

The City of Santa Clarita's General Plan includes various goals and policies designed to help reduce GHG emissions within the City. Policies pertaining to improving air quality and climate change are addressed in the Conservation and Open Space Element.

- Policy CO 1.3.4: Promote and encourage cogeneration projects for commercial and industrial facilities, provided they meet all applicable environmental quality standards including those related to air and noise and provide a net reduction in greenhouse gas (GHG) emissions associated with energy production.
- Policy CO 7.1.1: Through the mixed land use patterns and multi-modal circulation policies set forth in the Land Use and Circulation Elements, limit air pollution from transportation sources.
- Policy CO 7.1.2: Support the use of alternative fuel vehicles.
- Policy CO 7.1.3: Support alternative travel modes and new technologies, including infrastructure to support alternative fuel vehicles, as they become commercially available.
- Policy CO 7.2.1: Ensure adequate spacing of sensitive land uses from the following sources of air pollution: high traffic freeways and roads; distribution centers; truck stops; chrome plating facilities; dry cleaners using perchloroethylene; and large gas stations, as recommended by CARB.
- Policy CO 7.3.1: Coordinate with local, regional, state, and federal agencies to develop and implement regional air quality policies and programs.
- Policy CO 8.3.6: Require new development to use passive solar heating and cooling techniques in building design and construction, which may include but are not be limited to building orientation, clerestory windows, skylights, placement and type of windows, overhangs to shade doors and windows, and use of light colored roofs, shade trees, and paving materials.
- Policy CO 8.3.7: Encourage the use of trees and landscaping to reduce heating and cooling energy loads, through shading of buildings and parking lots.

[23] Santa Clarita, City of, Climate Action Plan Final Report, August 2012.

- Policy CO 8.3.11: Consider allowing carbon off-sets for large development projects, if appropriate, which may include funding off-site projects or purchase of credits for other forms of mitigation, provided that any such mitigation shall be measurable and enforceable.

4.4.3. CONSIDERATION AND DISCUSSION OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

In accordance with CEQA Guidelines Appendix G, a project may create a significant impact in relation to greenhouse gas emissions if it would:

Threshold (a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or

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

Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. In addition, while GHG impacts are recognized exclusively as cumulative impacts, GHG emissions impacts must also be evaluated on a project-level under CEQA.[24]

South Coast Air Quality Management District

Neither the State of California nor the SCAQMD has adopted emission-based thresholds of significance for GHG emissions under CEQA. However, in October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*.[25] This guidance document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association (CAPCOA), explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO_2e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (see SCAQMD Resolution No. 08-35, December 5, 2008).

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until Statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects.

[24] CAPCOA, CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008.

[25] SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008.

The most recent proposal, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses.[26]

Tier 1

Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2

Consider whether or not the Proposed Project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

Tier 3

Consider whether the Project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO_2e per year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO_2e per year), commercial projects (1,400 MT CO_2e per year), and mixed-use projects (3,000 MT CO_2e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO_2e per year would be used for all non-industrial projects. If the Project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4

Consider whether the Project generates GHG emissions in excess of applicable performance standards for the Project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce Statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO_2e per service population for project-level analyses and 6.6 MT CO_2e per service population for plan-level analyses. If the Project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5

Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the Project efficiency target to Tier 4 levels.

City of Santa Clarita

As discussed previously, in August 2012, the City approved its CAP, which defined a City-specific threshold for project-level analysis. If a project was consistent with the land use and zoning assumptions utilized in the General Plan, which were used to create the CAP's GHG emission inventory, then the Project would have been considered consistent with the CAP and have a less-than-significant impact. However, because the CAP was only qualified under CEQA until August 2020 and the first operational year of the Project is 2022, the Proposed Project was not able to tier from the City's CAP. Additionally, the CAP did mention that "some large scale development projects that generate a significant number of vehicle miles traveled and/or are heavy industrial projects may also be required to demonstrate [quantitative] consistency with the CAP." To demonstrate quantitative consistency with the CAP, a project can show that it would reduce GHG emissions by 12 percent below the BAU situation. A reduction of 12 percent would be consistent

[26] SCAQMD, Greenhouse Gases CEQA Significance Thresholds Working Group Meeting No. 15, September 2010.

with the localized reductions assumed in the CAP. A discussion of the Project's consistency with the CAP is provided for informational purposes only because the CAP is not certified beyond August 2020.

Because the Project has several stationary sources (emergency generators, steam boilers chillers), this analysis applies the recommended SCAQMD threshold of 10,000 MT CO_2e per year. Per the SCAQMD guidance, construction emissions should be amortized over the operational life of the Project, which is assumed to be 30 years.[27] This impact analysis, therefore, adds amortized construction emissions to the estimated annual operational emissions and then compares operational emissions to the proposed SCAQMD threshold of 10,000 MT CO_2e per year.

METHODOLOGY

Construction

CalEEMod Version 2016.3.2 was used to estimate potential Project-generated GHG emissions during construction. Construction of the Project would result in GHG emissions primarily associated with use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. All details for construction criteria air pollutants discussed in Section 4.2 of this Draft SEIR are also applicable for the estimation of construction-related GHG emissions. The GWP values identified in CalEEMod were applied to the Project.

Operation

CalEEMod Version 2016.3.2 was used to estimate potential Project-generated operational GHG emissions from vehicular sources, area sources (natural gas combustion and landscape maintenance), electrical generation (including electrical generation associated with water supply and wastewater treatment), and solid waste. Emissions from each category—area sources, energy sources, mobile sources, solid waste, and water supply and wastewater treatment—are discussed in the following text with respect to the Project. Operational year 2022 was assumed consistent with the construction schedule. To perform the informational BAU analysis required to show consistency with the CAP, a BAU and a reduced scenario were generated in CalEEMod for each source of operational GHG emissions. The reduced scenario takes credit for emissions reductions based on project features that the CAP allows for, including land use design, transportation, and energy efficiency. This analysis is provided for disclosure purposes and not utilized in the significance determination of GHG-related impacts.

Area Sources

CalEEMod was used to estimate GHG emissions from the Project's area sources, which include operation of landscape maintenance equipment, which produce minimal GHG emissions. Consumer product use and architectural coatings result in volatile organic compound emissions, which are analyzed in the air quality analysis only (see Section 4.2, Air Quality, of this Draft SEIR).

Energy Sources

The estimation of operational energy emissions was based on CalEEMod land use defaults and units or total area (i.e., square footage) of the Project's land uses. For the energy uses from

[27] SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008.

nonresidential buildings, CalEEMod energy intensity value (electricity or natural gas usage per square foot per year) assumptions were based on the California Commercial End-Use Survey database. Emissions were calculated by multiplying the energy use by the utility carbon intensity (pounds of GHGs per kilowatt-hour [kWh] for electricity or 1,000 British thermal units [BTU] for natural gas) for CO_2 and other GHGs. Annual natural gas (non-hearth) and electricity emissions were estimated in CalEEMod using the emissions factors for SCE, which would be the energy source provider for the Project.

As discussed above, the Project would be required to comply with the 2019 California Building Energy Efficiency Standards (24 CCR Part 6) because the Project would be constructed after January 1, 2020. For the purposes of estimating Project-generated energy emissions, a mitigation measure was applied to assume a 5-percent reduction from the 2013 standards (the basis for the default energy usage factors in CalEEMod) to reflect the benefits of compliance with the 2019 standards. In addition, it was assumed that high-efficiency lighting would be incorporated into hospital facility and the parking garage.

CalEEMod default energy intensity factors (CO_2, CH_4, and N_2O mass emissions per kWh) for SCE are based on the value for SCE's energy mix in 2012. SB X1 2 established a target of 33 percent from renewable energy sources for all electricity providers in California by 2020, and SB 350 calls for further development of renewable energy, with a target of 50 percent by 2030. The CO_2 emissions intensity factors for utility energy use in CalEEMod were adjusted to account for implementation of 50 percent by 2030 and then interpolated to 2022, to reflect the increase in percentage of renewable energy in SCE's energy portfolio.

Mobile Sources

All details for criteria air pollutants discussed in the Air Quality and Greenhouse Gas Emissions Analysis Technical Report (included as **Appendix B**, of this Draft SEIR) are also applicable for the estimation of operational mobile source GHG emissions. Regulatory measures related to mobile sources include AB 1493 (Pavley I) and related federal standards. AB 1493 required that CARB establish GHG emission standards for automobiles, light-duty trucks, and other vehicles determined by CARB to be vehicles that are primarily used for noncommercial personal transportation in the State. In addition, the NHTSA and USEPA have established corporate fuel economy standards and GHG emission standards, respectively, for automobiles and light-, medium-, and heavy-duty vehicles. Implementation of these standards and fleet turnover (replacement of older vehicles with newer ones) will gradually reduce emissions from the Project's motor vehicles. The effectiveness of fuel economy improvements was evaluated by using the CalEEMod emission factors for motor vehicles in 2020 to the extent it was captured in EMFAC 2014. CalEEMod has yet to be updated with the latest version of EMFAC (EMFAC 2017). Generally speaking, EMFAC 2017 emission factors incorporate more recent legislation that would result in vehicle GHG emission reductions. For example, the LCFS calls for a 10-percent reduction in the "carbon intensity" of motor vehicle fuels by 2020, which would further reduce GHG emissions. However, the carbon intensity reduction associated with the LCFS was not assumed in EMFAC 2014 and, thus, was not included in CalEEMod 2016 or the calculations included within this Draft SEIR; therefore, the calculations in the analysis below are considered conservative.

The LCFS calls for a 10 percent reduction in the "carbon intensity" of motor vehicle fuels by 2020, which would further reduce GHG emissions. However, the carbon intensity reduction associated

with the LCFS was not assumed in EMFAC 2014 and, thus, was not included in CalEEMod 2016 or the calculations below, which are considered conservative.

For the reduced scenario, the CAPCOA has developed methodologies for quantifying the emission reductions associated with numerous mitigation measures.[28] Several of the measures, which are related to land use and transportation planning that would reduce vehicle trips and/or trip lengths, enhance walking and bicycles as alternative modes of transportation, enhance availability of transit, and incorporate other approaches. Regarding mobile source emission reduction features relating to land use, it was assumed that the Project would involve an increase in typical density, access to transit, and be consistent with the hospital's existing pedestrian network. The Project's density of 186 jobs per acre is greater than the assumed blended average 20 jobs per acre, which results in a reduction in vehicle miles traveled (VMT).[29] The Project is also approximately 0.25 mile from the McBean Parkway and Avenida Navarre bus station. This proximity supports an increase in transit ridership, thereby reducing VMT.[30]

Solid Waste

The Project would generate solid waste and, therefore, result in CO_2e emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste. For the reduced scenario, Project compliance with the 50-percent diversion rate consistent with AB 939 and City of Santa Clarita Municipal Code Section 15.44.215 (Collection Arrangements Required) has been included in the modeling assumptions.

Water and Wastewater

Supply, conveyance, treatment, and distribution of water for the Project require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the Project requires the use of electricity for conveyance and treatment, which would also result in indirect GHG emissions. Water consumption estimates for both indoor and outdoor water use and associated electricity consumption from water use and wastewater generation were estimated using CalEEMod default values.

For the reduced scenario, the Project would install low-flow bathroom and faucets, low-flow toilets, and low-flow showers. In regard to outdoor water, the Project would install water-efficient devices and landscaping in accordance with Model Water Efficient Landscape Ordinance, as stated in Section 17.51.030 of the Santa Clarita Municipal Code, including use of drought-tolerant species appropriate to the climate and region.

[28] CAPCOA, Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures, August 2010.

[29] The Proposed Project includes development of 200,000 square feet of hospital facilities on Lot D. Much of this space will be occupied by existing employees from the Main Hospital building. As such, 138,000 square feet of space, which would be occupied by new employees, would be generated as a result of the Proposed Project. The development area is approximately 2 acres in size. The Institute of Transportation Engineers assumes a building area per employee for hospital land uses of 372 square feet/employee. 138,000 / 372 square feet per employee = 371 employees. 371 employees / 2 acres = 186 jobs per acre.

[30] CAPCOA, Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures, August 2010.

PROJECT IMPACTS

Threshold (a): Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Construction Emissions

Construction of the Project would result in GHG emissions, which are primarily associated with the use of off-road construction equipment, on-road vendor trucks, and worker vehicles. Construction of the Project is anticipated to commence in April 2021 and be completed in December 2022, lasting a total of 20 months. **Table 4.4-2** presents construction emissions for the Project in 2021 and 2022 from on-site and off-site emission sources.

Table 4.4-2
Estimated Annual Construction GHG Emissions

Year	CO_2 (metric tons/yr)	CH_4 (metric tons/yr)	N_2O (metric tons/yr)	CO_2e (metric tons/yr)
2021	510.20	0.07	0.00	511.85
2022	32.99	<0.01	0.00	33.12
Total	**543.19**	**0.07**	**0.00**	**544.87**
			Amortized Construction Emissions	**18.17**

Source: Dudek, Air Quality and GHG Emissions Analysis and Technical Report for the HMNH Expansion Project, February 2020.
Notes: CO2 = carbon dioxide; CH4 = methane; N2O = nitrous oxide; CO2e = carbon dioxide equivalent.

As shown in **Table 4.4-2**, the estimated total GHG emissions during construction would be approximately 512 MT CO_2e in 2021 and 33 MT CO_2e in 2022 , for a total of approximately 545 MT CO_2e over the construction period. Estimated Project-generated construction emissions amortized over 30 years would be approximately 18 MT CO_2e per year. As with Project-generated construction criteria air pollutant emissions, GHG emissions generated during construction of the Project would be short term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. Because there is no separate GHG emissions threshold for construction, the evaluation of significance is discussed in the operational emissions analysis below.

Operational Emissions

Operation of the Project would generate GHG emissions through motor vehicle trips to and from the Project Site; landscape maintenance equipment operation; energy use (natural gas and generation of electricity consumed by the Project); solid waste disposal; stationary sources; and generation of electricity associated with water supply, treatment, and distribution and wastewater treatment.

The estimated operational (year 2022) Project-generated GHG emissions for both the BAU and reduced scenario from area sources, energy usage, motor vehicles, solid waste generation, stationary sources, and water usage and wastewater generation are shown in **Table 4.4-3.**

As shown in **Table 4.4-3**, estimated annual BAU Project-generated GHG emissions would be approximately 9,959 MT CO_2e per year as a result of Project operations only. In 2022, estimated annual Project-generated operational emissions plus amortized Project construction emissions would be approximately 9,977 MT CO_2e. When reduction measures discussed above are taken into account, the Proposed Project would generate approximately 8,318 MT CO_2e per year. The

Project would not exceed the proposed SCAQMD threshold of 10,000 MT CO_2e for industrial sources. Therefore, the Project's GHG contribution would not be cumulatively considerable and would be less than significant.

Table 4.4-3
Estimated Annual Operational GHG Emissions

Emission Source	CO2 (metric tons/yr)	CH4 (metric tons/yr)	N2O (metric tons/yr)	CO2e (metric tons/yr)
BAU Scenario[a]				
Area	0.01	>0.01	0.00	0.02
Energy	2,123.35	0.08	0.3	2,133.44
Mobile	2,325.58	0.08	0.00	2,328.30
Stationary	4,270.22	0.09	0.00	4,272.45
Solid waste	438.46	25.91	0.00	1,086.26
Water supply and wastewater	111.62	0.82	0.02	138.25
Total	**8,822.82**	**27.02**	**0.05**	**9,958.72**
			Amortized Construction Emissions	*18.17*
			Operation + Amortized Construction Total	**9,976.89**
Reduced Scenario[b]				
Area	0.01	0.00	0.00	0.02
Energy	1,939.65	0.08	0.02	1,948.92
Mobile	1,415.56	0.07	0.00	1,417.35
Stationary	4,270.22	0.09	0.00	4,272.45
Solid waste	219.23	12.96	0.00	543.13
Water supply and wastewater	95.59	0.69	0.02	118.07
Total	**7,940.26**	**13.89**	**0.04**	**8,299.94**
			Amortized Construction Emissions	*18.17*
			Operation + Amortized Construction Total	**8,318.11**
			SCAQMD	*10,000*
			Threshold Exceeded?	**No**

Source: Dudek, Air Quality and GHG Emissions Analysis and Technical Report for the HMNH Expansion Project, February 2020.
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent
[a] These emissions reflect the "unmitigated" output and operational year 2022.
[b] These emissions reflect CalEEMod "mitigated" output and operational year 2022.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

The 2008 Master Plan EIR analyzed Project impacts using a guidance document released by the Governor's Office of Planning and Research, as thresholds currently established in Section 8 of Appendix G of the CEQA Guidelines were not finalized until after publication of the Master Plan EIR. The analysis determined that the construction emissions would be less than significant as GHG emissions would represent a small fraction of total Project-related emissions. GHG emissions resulting from Project operation would primarily result from vehicle exhaust and the consumption of electricity and natural gas for heating. The analysis of global climate change provided three mitigation measures in addition to those mitigation measures in the Traffic and Air Quality sections of the 2008 Master Plan EIR that reduce stationary source, mobile source, and energy emissions. These additional mitigation measures aimed to reduce GHG emissions by requiring installation of light-colored paving and cool roofs where feasible, placement of shade trees, and utilization of LED lights for outdoor lighting. The Proposed Project would not require such mitigation measures

as the GHG emissions analysis above determined that the Project would not exceed the proposed SCAQMD threshold of 10,000 MT CO_2e for industrial sources.

Mitigation Measures

The Proposed Project has no additional impacts beyond those previously identified in the 2008 Master Plan EIR. Impacts related to GHG emissions would be less than significant. Therefore, no additional mitigation measures are required.

Level of Significance After Mitigation

Impacts related to GHG emissions would be less than significant without mitigation.

Threshold (b): Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Consistency with the City of Santa Clarita Climate Action Plan (CAP)

As discussed above, the City's CAP contained a programmatic analysis of GHG emissions and a project could have tiered from the CAP for its impact analysis of GHG emissions if the project emissions were captured in the CAP's projected inventory for 2020 and the project did not exceed the growth projections assumed in the CAP. Although the Proposed Project would not require a change in land use or zoning, because the recent iteration of the CAP was only certified to allow project-specific tiering through August 2020, the Proposed Project, which has an estimated buildout date of 2022, was not able to tier from the CAP. Therefore, while the Project is assessed for consistency with the City's CAP for informational purposes, it is not the sole factor in determining level of significance for impacts related to GHGs.

After all applicable reduction measures are incorporated, the reduced scenario would result in a 17-percent reduction in emissions when compared to the BAU scenario. This reduction would exceed the 12-percent reduction required by the CAP for large industrial projects and/or projects that generate a substantial increase in VMT. The emissions reductions are largely a result of an increase in land use density, proximity to mass transit, increased energy efficiency, and waste reduction. Therefore, the Project would not conflict with the CAP.

Consistency with SCAG's 2016-2040 RTP/SCS

SCAG's 2016-2040 RTP/SCS is a regional growth management strategy that targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The 2016-2040 RTP/SCS incorporates local land use projections and circulation networks in city and county general plans.[31] The 2016-2040 RTP/SCS reaffirms the land use policies that were incorporated into the 2012-2035 RTP/SCS. These foundational policies, which guided the development of the 2016-2040 RTP/SCS's strategies for land use, include the following:

- Identify regional strategic areas for infill and investment
- Structure the plan on a three-tiered system of centers development[32]

[31] SCAG, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies, 2016.

[32] Complete language: "Identify strategic centers based on a three-tiered system of existing, planned and potential relative to transportation infrastructure. This strategy more effectively integrates land use planning and transportation

- Develop "Complete Communities"
- Develop nodes on a corridor
- Plan for additional housing and jobs near transit
- Plan for changing demand in types of housing
- Continue to protect stable, existing single-family areas
- Ensure adequate access to open space and preservation of habitat
- Incorporate local input and feedback on future growth

The 2016-2040 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility, and accessibility for people across the region. In particular, the 2016-2040 RTP/SCS draws a closer connection between where people live and work, and it offers a blueprint for how Southern California can grow more sustainably. The 2016-2040 RTP/SCS also includes strategies focused on compact infill development and economic growth by building the infrastructure the region needs to promote the smooth flow of goods and easier access to jobs, services, educational facilities, healthcare and more.

The 2016-2040 RTP/SCS indicates the SCAG region was home to about 18.3 million people in 2012 and, in 2016, included approximately 5.9 million homes and 7.4 million jobs.[33] By 2040, the integrated growth forecast projects that these figures will increase by 3.8 million people, with nearly 1.5 million more homes and 2.4 million more jobs.

The 2016-2040 RTP/SCS is expected to reduce per capita transportation emissions by 8 percent by 2020 and 18 percent by 2035. Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016-2040 RTP/SCS's GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040.[34] The 2016-2040 RTP/SCS would result in an estimated 21-percent decrease in per capita GHG emissions by 2040. By meeting and exceeding the then applicable SB 375 targets for 2020 and 2035, as well as achieving an approximately 21-percent decrease in per capita GHG emissions by 2040 (an additional 3-percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2016-2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the State's GHG emission reduction goals.

In March 2018, CARB updated the SB 375 targets to require an 8 percent reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions.[35] As this reduction

investment." A more detailed description of these strategies and policies can be found on pp. 90–92 of the SCAG 2008 Regional Transportation Plan, adopted in May 2008.

[33] The SCAG 2016 RTP/SCS is based on year 2012 demographic data with growth forecasts developed for 2020, 2035, and 2040.

[34] SCAG, Final Program Environmental Impact Report for 2016 RTP/SCS, 2016, Figure 3.8.4-1.

[35] CARB, SB 375 Regional Greenhouse Gas Emissions Reduction Targets, Final, 2018.

target was updated after publication of the 2016-2040 RTP/SCS, it is expected that the next iteration of the RTP/SCS will include this target.

Typically, a project would be consistent with the RTP/SCS if the project does not exceed the underlying growth assumptions in the RTP/SCS. Though the Project increases the square footage permitted under the previously approved Specific Plan, it does not increase the approved maximum bed-count. Pending approval of this Specific Plan Amendment, the City will determine that the Project is consistent with the City's existing General Plan and Zoning Code. Therefore, this type of consistency analysis does not apply. However, the major goals of the 2016-2040 RTP/SCS are outlined in **Table 4.4-4**, along with the Project's consistency with them.

Table 4.4-4
Consistency with the SCAG 2016-2040 RTP/SCS

RTP/SCS Measure[a]	Proposed Project Consistency
Focus New Growth Around Transit	*Consistent.* The Project would be served by existing transit.
Improve Air Quality and GHG	*Inconsistent*. The Project would result in criteria air pollutant and GHG emissions during construction and operation. More specifically, operating the emergency generators over a 4-hour triennial testing period would exceed the SCAQMD significance threshold for NO_x emissions. The Project would result in a cumulatively considerable net increase of criteria pollutant for which the region is non-attainment under the federal and state ambient air quality standards.
Preserve Natural Lands	*Consistent*. The Project would not impact natural lands during construction or operation.

Source: Dudek, Air Quality and GHG Emissions Analysis and Technical Report for the HMNH Expansion Project, February 2020

[a] Several RTP/SCS measures are not applicable to the Proposed Project and are not included here, such as expanding passenger rail, improving highway and arterial capacity, strengthening the regional transportation network for goods movement, levering technology, and improving airport access.

As shown in **Table 4.4-4**, the Project would not conflict with most of the goals in the 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS is not directly applicable to the Project because the underlying purpose of the 2016-2040 RTP/SCS is to provide direction and guidance by making the best transportation and land use choices for future development. However, development of the Project would support the critical goals of the 2016-2040 RTP/SCS by increasing land use density, locating workplaces near public transit, and incorporating energy-efficient design features, such as high-efficiency lighting in the parking structure.

Consistency with CARB's Scoping Plan

The Scoping Plan, approved by CARB in 2008 and updated in 2014 and 2017, provides a framework for actions to reduce California's GHG emissions and requires CARB and other State agencies to adopt regulations and other initiatives to reduce GHGs emissions.[36] Accordingly, for the purpose of the analysis below, the Scoping Plan collectively comprises the original 2008 Plan and the 2014 and 2017 updates. The Scoping Plan is not directly applicable to specific projects or intended to be used for project-level evaluations. Under the Scoping Plan, however, there are several State regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other State agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs

[36] CARB, Climate Change Scoping Plan: A Framework for Change, December 2008.

in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., LCFS), among others.

The Scoping Plan recommends strategies for implementation at the Statewide level to meet the goals of AB 32 and establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. **Table 4.4-5** highlights applicable measures that have been, or will be, developed under the Scoping Plan and the Project's consistency with Scoping Plan measures. A table with all measures (including non-applicable measures) is provided in the Air Quality and Greenhouse Gas Emissions Analysis Technical Report, available in **Appendix B** of this Draft SEIR. To the extent that these regulations are applicable to the Project, its occupants, or uses, the Project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law.

Table 4.4-5
Project Consistency with Scoping Plan GHG Emissions Reduction Strategies

Scoping Plan Measure	Measure Number	Project Consistency
Electricity and Natural Gas Sector		
Energy Efficiency Measures (Electricity)	E-1	The Project would be constructed in accordance with CALGreen and Title 24 building standards. The Project would use high-efficiency lighting in the parking garage.
Energy Efficiency (Natural Gas)	CR-1	The Project would be constructed in accordance with CALGreen and Title 24 building standards at the time of building construction.
Renewables Portfolios Standard (33 percent by 2020)	E-3	The Project would use energy supplied by Southern California Edison, which is in compliance with the Renewables Portfolio Standard.
Renewables Portfolios Standard (50 percent by 2050)	Proposed	The Project would use energy supplied by Southern California Edison, which is in compliance with the Renewables Portfolio Standard.
Water Sector		
Water Use Efficiency	W-1	In regard to indoor water use, the Project would install low-flow bathroom, toilets, and showers. In regard to outdoor water, the Project would install water-efficient devices and landscaping in accordance with Model Water Efficient Landscape Ordinance, including use of drought-tolerant species appropriate to the climate and region.
Green Buildings		
1. State Green Building Initiative: Leading the Way with State Buildings (Greening New and Existing State Buildings)	GB-1	The Project would be required to be constructed in compliance with State or local green building standards in effect at the time of building construction.
Recycling and Waste Management Sector		
Mandatory Commercial Recycling	RW-3	During both construction and operation of the Project, the Project would comply with all State regulations related to solid waste generation, storage, and disposal, including the California Integrated Waste Management Act, as amended. During construction, all wastes would be recycled to the maximum extent possible.
High GWP Gases Sector		
Stationary Equipment Refrigerant Management Program – Refrigerant Tracking/Reporting/Repair Program	H-6	The Project's chillers would follow the required inspection and monitoring schedule and equipped with an automatic leak detection system.

Table 4.4-5, continued

Scoping Plan Measure	Measure Number	Project Consistency
Stationary Equipment Refrigerant Management Program – Specifications for Commercial and Industrial Refrigeration	H-6	The Project's chillers specifications would meet all requirements for commercial refrigeration.

Source: CARB, Climate Change Scoping Plan: A Framework for Change, December 2008.

Based on the analysis in **Table 4.4-5**, the Project would be consistent with applicable strategies and measures in CARB's Scoping Plan. Further, the Project would not impede the attainment of the GHG reduction goals for 2030 or 2050 identified in EO S-3-05 and SB 32. EO S-3-05 established the following goals: GHG emissions reduction to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. SB 32 established for a Statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that Statewide GHG emissions are reduced to at least 40 percent below 1990 levels by December 31, 2030. While there are no established protocols or thresholds of significance for that future year analysis, CARB forecasts that compliance with the current Scoping Plan puts the State on a trajectory of meeting these long-term GHG goals, although the specific path to compliance is unknown.[37] As discussed previously, the Project would be consistent with the GHG emission reduction measures in the Scoping Plan and would not conflict with the State's trajectory toward future GHG reductions. The Project's consistency would assist in meeting the City's contribution to GHG emission reduction targets in California. Based on the above considerations, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Therefore, Project impacts would be less than significant.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

The analysis in the 2008 EIR found that while the Project would contribute to global climate change through direct emissions of GHGs (i.e., on-site area sources, off-site energy production required for on-site activities, and vehicle trips generated by the Proposed Project), the Project would neither assist nor hinder achievement of State GHG reduction goals. In addition, the Project would not consume excessive energy resources compared to BAU levels. As such, impacts were determined to be less than significant without implementation of additional mitigation measures. Similarly, the Proposed Project would not assist or hinder achievement of State GHG reduction goals and would have no additional impacts beyond those identified in the 2008 Master Plan EIR.

Mitigation Measures

The Proposed Project has no additional impacts beyond those previously identified in the 2008 Master Plan EIR. Impacts related to GHG emissions would be less than significant. Therefore, no additional mitigation measures are required.

Level of Significance After Mitigation

Even without mitigation, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

[37] CARB, First Update to the Climate Change Scoping Plan Building on the Framework Pursuant to AB 32 – The California Global Warming Solutions Act of 2006, May 2014.

4.4.4. CUMULATIVE IMPACTS

As explained above, the analysis of a project's GHG emissions inherently comprises a cumulative impacts analysis as climate change is a global issue. Accordingly, the analysis presented above accounts for the Project's potential to contribute to the cumulative impact of global climate change.

The analysis shows that the Project is consistent with CARB's Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities while achieving greater energy efficiency. The analysis also shows that the Project would generally be consistent with the 2016-2040 RTP/SCS by supporting its critical goals of increasing land use density, locating workplaces near public transit, and incorporating energy-efficient design features, such as high-efficiency lighting in the parking structure. Given the Project's consistency with Statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Project's incremental contribution to GHG emissions and their effects on climate change would not be cumulatively considerable. For these reasons, the Project's cumulative contribution to global climate change would be less than significant.

This section of the SEIR analyzes the potential noise impacts associated with the construction and operation of the Proposed Project. A Noise Analysis for the Proposed Project, which is included in **Appendix D** of this Draft SEIR, was prepared by Dudek in September 2019. Specifically, the analysis describes the existing noise environment in the vicinity of the Project Site, estimates future noise levels in surrounding sensitive land uses resulting from construction and operation of the Proposed Project, and provides mitigation measures to address any impacts that are deemed significant.

4.5.1. ENVIRONMENTAL SETTING

NOISE AND VIBRATION FUNDAMENTALS

Fundamentals of Environmental Noise

Vibrations, traveling as waves through air from a source, exert a force perceived by the human ear as sound. Sound pressure level (referred to as sound level) is measured on a logarithmic scale in decibels (dB) that represent the fluctuation of air pressure above and below atmospheric pressure. Frequency, or pitch, is a physical characteristic of sound and is expressed in units of cycles per second or hertz (Hz). The normal frequency range of hearing for most people extends from about 20 to 20,000 Hz. The human ear is more sensitive to middle and high frequencies, especially when the noise levels are quieter. As noise levels get louder, the human ear starts to hear the frequency spectrum more evenly. To accommodate for this phenomenon, a weighting system to evaluate how loud a noise level is to a human was developed. The frequency weighting called "A" weighting is typically used for quieter noise levels, which de-emphasizes the low frequency components of the sound in a manner similar to the response of a human ear. This A-weighted sound level is called the "noise level" and is referenced in units of dBA.

Since sound is measured on a logarithmic scale, a doubling of sound energy results in a 3 dBA increase in the noise level. Changes in a community noise level of less than 3 dBA are not typically noticed by the human ear.[1] Changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. An increase of 5 dBA is readily noticeable.[2] The human ear perceives a 10 dBA increase in sound level as a doubling of the sound level (i.e., 65 dBA sounds twice as loud as 55 dBA to a human ear).

An individual's noise exposure occurs over a period of time; however, noise level is a measure of noise at a given instant in time. Community noise sources vary continuously, being the product of many noise sources at various distances, all of which constitute a relatively stable background or ambient noise environment. The background, or ambient, noise level gradually changes throughout a typical day, corresponding to distant noise sources, such as traffic volume, as well as changes in atmospheric conditions.

Noise levels are generally higher during the daytime and early evening when traffic (including airplanes), commercial, and industrial activities are the greatest. However, noise sources experienced during nighttime hours when background levels are generally lower can be potentially more conspicuous and irritating to the receiver. In order to evaluate noise in a way

1 California Department of Transportation, *Technical Noise Supplement – A Technical Supplement to the Traffic Noise Analysis Protocol*, 1998.

2 Federal Highway Administration, *Highway Traffic Noise Analysis and Abatement Policy Guidance*, https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm, accessed November 21, 2019.

that considers periodic fluctuations experienced throughout the day and night, a concept termed "community noise equivalent level" (CNEL) was developed, wherein noise measurements are weighted, added, and averaged over a 24-hour period to reflect magnitude, duration, frequency, and time of occurrence. A complete definition of CNEL is provided below.

Different types of measurements are used to characterize the time-varying nature of sound. These measurements include the equivalent sound level (L_{eq}), the minimum and maximum sound levels (L_{min} and L_{max}), percentile-exceeded sound levels (L_{xx}), the day–night sound level (L_{dn}), and the CNEL. Below are brief definitions of these measurements and other terminology used in this report.

- *Decibel* (dB) is a unitless measure of sound on a logarithmic scale which indicates the squared ratio of sound pressure amplitude to a reference sound pressure amplitude. The reference pressure is 20 micropascals.
- *A-weighted decibel* (dBA) is an overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
- *Equivalent sound level* (L_{eq}) is the constant level that, over a given time period, transmits the same amount of acoustic energy as the actual time-varying sound. Equivalent sound levels are the basis for both the day–night average sound levels (L_{dn}) and community noise equivalent level (CNEL) scales.
- *Maximum sound level* (L_{max}) is the maximum sound level measured during the measurement period.
- *Minimum sound level* (L_{min}) is the minimum sound level measured during the measurement period.
- *Percentile-exceeded sound level* (L_{xx}) is the sound level exceeded for x percent of a specific time period. L_{10} is the sound level exceeded 10 percent of the time.
- *Day–night average sound level* (L_{dn}). The L_{dn} is a 24-hour average A-weighted sound level with a 10-dB penalty added to the nighttime hours from 10:00 p.m. to 7:00 a.m. The 10-dB penalty is applied to account for increased noise sensitivity during the nighttime hours. This metric is similar to CNEL (see definition below); resulting values from application of L_{dn} versus CNEL rarely differ by more than 1 dB, and therefore these two methods of describing average noise levels are often considered interchangeable.
- *Community noise equivalent level* (CNEL). The CNEL is the average equivalent A-weighted sound level during a 24-hour day. CNEL accounts for the increased noise sensitivity during the evening hours (7:00 p.m. to 10:00 p.m.) and nighttime hours (10:00 p.m. to 7:00 a.m.) by adding 5 dB to the sound levels in the evening and 10 dB to the sound levels at night. CNEL and L_{dn} are often considered equivalent descriptors.

Exterior Noise Distance Attenuation

Noise sources are classified in two forms: (1) point sources, such as stationary equipment or a group of construction vehicles and equipment working within a spatially limited area at a given time, and (2) line sources, such as a roadway with a large number of pass-by sources (motor vehicles). Sound generated by a point source typically diminishes (attenuates) at a rate of 6.0 dBA for each doubling of distance from the source to the receptor at acoustically "hard" sites and at a rate of

7.5 dBA for each doubling of distance from source to receptor at acoustically "soft" sites. Sound generated by a line source (i.e., a roadway) typically attenuates at a rate of 3 dBA and 4.5 dBA per doubling distance, for hard and soft sites, respectively. Sound levels can also be attenuated by man-made or natural barriers.

For the purpose of sound attenuation discussion, a "hard" or reflective site does not provide any excess ground-effect attenuation and is characteristic of asphalt or concrete ground surfaces, as well as very hard-packed soils. An acoustically "soft" or absorptive site is characteristic of unpaved loose soil or vegetated ground.

Structural Noise Attenuation

Sound levels can also be attenuated by man-made or natural barriers. Solid walls or slopes associated with elevation differences typically reduce noise levels by 5 to 10 dBA.[3] Structures can also provide noise reduction by insulating interior spaces from outdoor noise. The outside-to-inside noise attenuation provided by typical structures in California ranges between 17 to 30 dBA with open and closed windows, respectively, as shown in **Table 4.5-1**.

Table 4.5-1
Outside-to-Inside Noise Attenuation (dBA)

Building Type	Open Windows	Closed Windows[a]
Residences	17	25
Schools	17	25
Churches	20	30
Hospitals/Offices/Hotels	17	25
Theaters	17	25

Source: Caltrans, Technical Noise Supplement – A Technical Supplement to the Traffic Noise Analysis Protocol, 1998.
[a] As shown, structures with closed windows can attenuate exterior noise by a minimum of 25 to 30 dBA.

Fundamentals of Vibration

Vibration is an oscillatory motion that can be described in terms of displacement, velocity, or acceleration. The response of humans to vibration is very complex. However, it is generally accepted that human response is best approximated by the vibration velocity level associated with the vibration occurrence.

Heavy equipment operation, including stationary equipment that produces substantial oscillation or construction equipment that causes percussive action against the ground surface, may be perceived by building occupants as perceptible vibration. It is also common for ground-borne vibration to cause windows, pictures on walls, or items on shelves to rattle. Although this perceived vibration can be intrusive to building occupants, it is seldom of sufficient magnitude to cause even minor cosmetic damage to buildings.

Peak particle velocity (PPV), which describes particle movement over time (in terms of physical displacement of mass, expressed as inches/second or in/sec), is generally employed for the discussion of vibration impacts on people and structures. Groundborne vibration generated by construction projects is usually highest during pile driving, rock blasting, soil compacting, jack

[3] California Department of Transportation, *Technical Noise Supplement – A Technical Supplement to the Traffic Noise Analysis Protocol*, 1998.

hammering, and demolition-related activities. Next to pile driving and soil compacting, grading activity has the greatest potential for vibration impacts when earthwork involves large bulldozers, large trucks, or other heavy equipment. The California Department of Transportation (Caltrans) uses a threshold of 0.2 in/sec PPV for annoyance to persons, where a continuous vibration source is involved; for transient sources (represented by construction activities), Caltrans uses a threshold of 0.24 in/sec PPV (which equates to a distinctly perceptible level). For commercial buildings constructed of concrete and steel, Caltrans identifies a damage threshold of 0.5 in/sec PPV. For residential structures employing concrete foundation and wood frame construction, Caltrans identifies a conservative maximum vibration level standard of 0.3 in/sec PPV.[4]

Health Effects of Noise

Noise is known to have a number of different adverse effects on humans. Based upon these recognized adverse effects of noise, criteria have been established to help protect the public health and safety and prevent disruption of certain human activities. These criteria are based on effects of noise on people such as hearing loss (not generally associated with community noise), communication interference, sleep interference, physiological responses, and annoyance.

AMBIENT HOSPITAL CAMPUS NOISE

Ambient Noise Monitoring

Sound level measurements are typically completed as part of a noise assessment study in order to establish ambient or baseline noise levels in the immediate vicinity of the proposed development.

The noise measurement locations are depicted as ST1 and ST2 in **Figure 4.5-1**. ST1 was approximately 20 feet south of the southern façade of the Main Hospital Building and 20 feet back from the eastern façade of this building. ST2 was approximately 20 feet north of the south end of the existing surface parking lot (PS-4), and 10 feet west of the landscape wall along the west side of the parking lot. The measured average noise level was 55 dBA L_{eq} at ST1 and 61 dBA L_{eq} at ST2. The slightly higher average noise level recorded at ST2 resulted from traffic noise contributions along McBean Parkway.

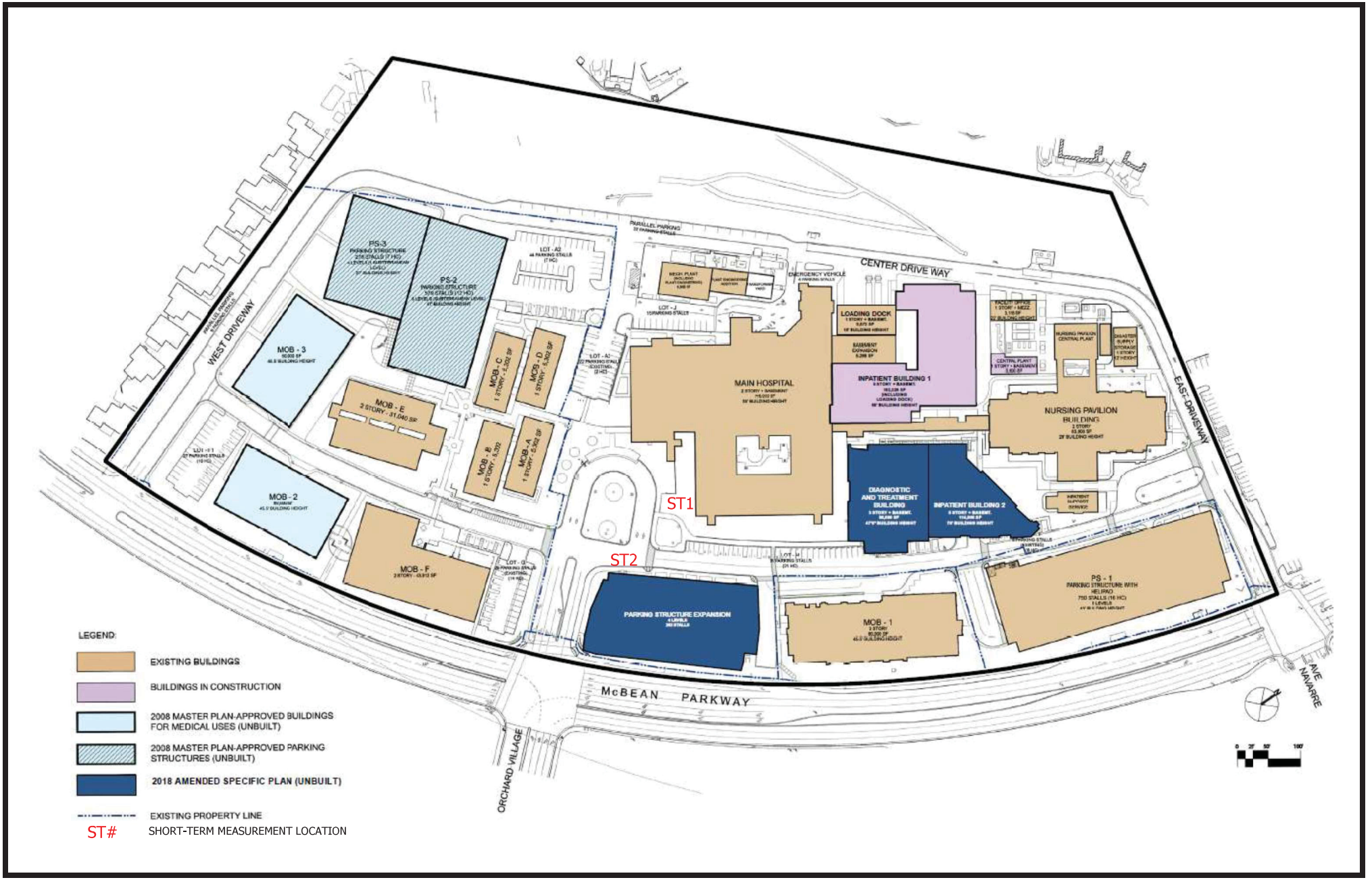
Table 4.5-2 shows the measured noise levels at ST1 and ST2, along with statistics related to the measurements. The field data measurement forms are found in Appendix A of the Noise Assessment Technical Report included in **Appendix D** of this Draft SEIR.

Table 4.5-2
Measured Average Sound Levels

Site	Description	Date/Time	L_{eq}[a]	L_{max}[b]	L_{min}[c]
ST1	Approximately 20 feet from south façade of Main Hospital Building	6/14/2017 11:00 a.m. to 11:15 a.m.	55 dB	63 dB	48 dB
ST2	Approximately 20 feet north of the southern end of surface parking lot on north side of Orchard Village Road entrance	6/14/2017 11:20 a.m. to 11:35 a.m.	61 dB	78 dB	49 dB

Source: Dudek, Noise Assessment Technical Report, September 2019.
Notes: Temperature 78 degrees, sunny, calm wind
[a] Equivalent Continuous Sound Level (Time-Average Sound Level)
[b] Maximum sound level recorded over the measurement duration
[c] Minimum sound level recorded over the measurement duration

[4] California Department of Transportation, Transportation and Construction Vibration Guidance Manual, 2013.



Source: Dudek, Noise Assessment Technical Report, 2019

Figure 4.5-1
Noise Measurement Location Map

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From the data in **Table 4.5-2**, on-site average noise levels generally fall well below the allowable daytime limit of 80 dBA L_{eq} and nighttime limit of 70 dBA L_{eq} for commercial land uses and is also compliant with the daytime limit of 65 dBA L_{eq} but exceeds the nighttime limit of 55 dBA L_{eq} for residential land uses at ST2. It should be noted that neither the new hospital space nor expanded parking structure would include outdoor use areas.

Existing ambient noise conditions for adjacent residences along McBean Parkway were determined via traffic noise modeling, which is discussed in further detail in Section 4.5.3, Consideration and Discussion of Environmental Impacts and Mitigation Measures, and shown in **Table 4.5-6** below. Generally, residences along McBean Parkway to the north and east of the Project Site are exposed to traffic noise level ranging from 70 to 71 dBA L_{eq} during peak traffic hours, which equates to 70 to 71 dBA CNEL. The off-site residence to the south, which is the closest to PS-4, is located approximately 100 feet from the edge of McBean Parkway, where the anticipated noise level from traffic is 65 L_{eq} during peak traffic hours, which equates to 65 dBA CNEL. Residences within 100 feet of the edge of McBean Parkway are within the *conditionally acceptable* exterior noise exposure range identified in the Santa Clarita Noise Element.[5]

4.5.2. REGULATORY FRAMEWORK

STATE

California Noise Control Act of 1973

Sections 46000 through 46080 of the California Health and Safety Code, known as the California Noise Control Act of 1973, declare that excessive noise is a serious hazard to public health and welfare and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. It also identifies a continuous and increasing bombardment of noise in the urban, suburban, and rural areas. The California Noise Control Act declares that the State of California has a responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise. It is the policy of the State to provide an environment for all Californians free from noise that jeopardizes their health or welfare.

California Noise Insulation Standards (CCR Title 24)

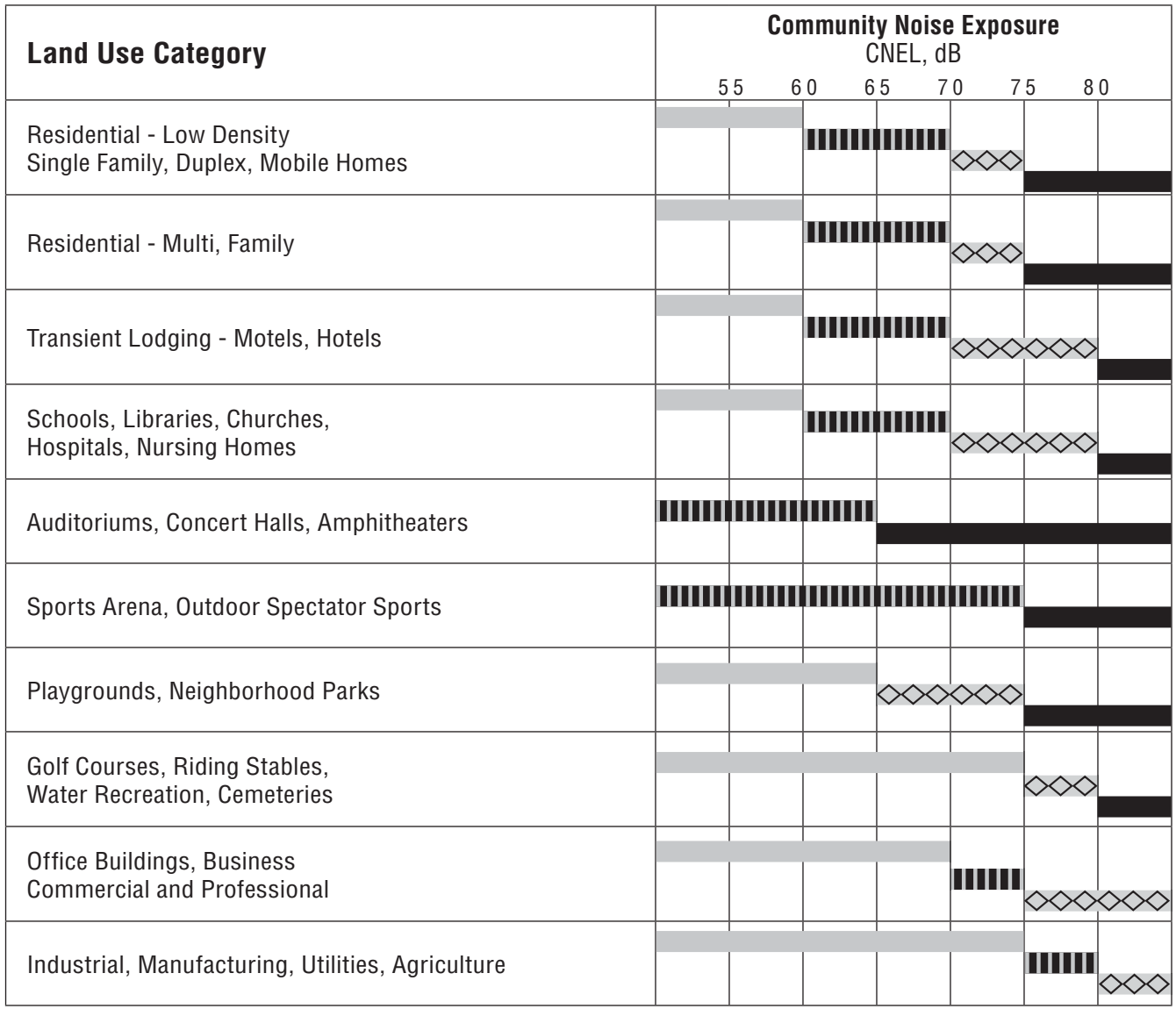
In 1974, the California Commission on Housing and Community Development adopted noise insulation standards for hotels, motels, dormitories, and multi-family residential buildings (California Code of Regulations Title 24, Part 2). Title 24 establishes standards for interior room noise (attributable to outside noise sources). The City of Santa Clarita applies the interior noise criterion of CNEL 45 dBA for single-family residences, in addition to multifamily residential structures.

California Noise Exposures Standards by Land Use

The State of California has adopted guidelines for acceptable noise levels in various land use categories.[6] The City of Santa Clarita and the County of Los Angeles have adopted these guidelines in a modified form as a basis for planning decisions based on noise considerations. The modified guidelines are shown in **Figure 4.5-2**. Modifications were made to eliminate overlap between categories in the table, in order to make the guidelines easier for applicants and

[5] City of Santa Clarita, *General Plan Noise Element*, 2011.

[6] California Governor's Office of Planning and Research, *General Plan Guidelines 2017*, Appendix D.



NORMALLY ACCEPTABLE

Specified land use is satisfactory, based upon the assumption that nay buildings involved are of normal conventional construction, without any special noise insulation requirements

CONDITIONALLY ACCEPTABLE

New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

NORMALLY UNACCEPTABLE

New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design. Sound walls, window upgrades, and site design modifications may be needed in order to achieve City standards.

CLEARLY UNACCEPTABLE

New construction or development should generally not be undertaken

Source: City of Santa Clarita General Plan, Noise Element, 2011.

FIGURE 4.5-2

Noise and Land Use Compatibility Guidelines

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decision makers to interpret and apply to planning decisions. A conditionally acceptable designation implies new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements for each land use is made and the needed noise insulation features are incorporated in the design. By comparison, a normally acceptable designation indicates that standard construction can occur with no special noise reduction requirements.

California Department of Transportation (Caltrans) Standards

Although the Caltrans standards are intended for application to transportation construction projects sponsored by Caltrans, the impact assessment procedures and criteria included in the Transportation and Construction Vibration Guidance Manual are routinely used for evaluation of various types of construction projects proposed or reviewed by local jurisdictions.[7] The Caltrans damage threshold for commercial buildings with concrete and steel construction is 0.5 in/sec PPV; for residential buildings, the damage threshold is 0.3 in/sec PPV. With respect to vibration impacts to persons, Caltrans uses a threshold of 0.2 in/sec PPV for long-term, continuous vibration sources (such as traffic), and a slightly higher annoyance threshold of 0.24 in/sec PPV for transient sources, such as construction.

LOCAL

City of Santa Clarita Municipal Code

Chapter 11.44.040 Noise Limits

Chapter 11.44.040 establishes noise standards in various land use zones during daytime (7:00 a.m.–10:00 p.m.) and nighttime (10:00 p.m.–7:00 a.m.) periods. For residential zones, the base noise levels are 65 dBA during the daytime period and 55 dBA during the nighttime period. For commercial and manufacturing zones, the base noise levels are 80 dBA during the daytime period and 70 dBA during the nighttime period.

For repetitive impulsive noise or steady, whine, screech, or hum noise, the base noise levels noted above are reduced by 5 dBA. If the noise occurs more than 5 minutes but less than 15 minutes per hour during the daytime period, the above base noise levels are raised by 5 dBA. If the noise occurs more than 1 minute but less than 5 minutes per hour during the daytime period, the above base noise levels are raised by 10 dBA. If the noise occurs less than 1 minute per hour during daytime period, the above base noise levels are raised by 20 dBA.

Chapter 11.44.070 Special Noise Sources - Machinery

This section states: "Any noise level from the use or operation of any machinery, equipment, pump, fan, air conditioning apparatus, refrigerating equipment, motor vehicle, or other mechanical or electrical device, or in repairing or rebuilding any motor vehicle, which exceeds the noise limits as set forth in Section 11.44.040 at any property line, or, if a condominium or rental units, within any condominium unit or rental unit within the complex, shall be a violation of this chapter."

[7] California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*, 2013.

Chapter 11.44.080 Special Noise Sources – Construction and Building

Pursuant to this section, no person may engage in any construction work that requires a building permit from the City on sites within 300 feet of a residentially zoned property, except between the hours of 7:00 a.m. and 7:00 p.m., Monday through Friday, and 8:00 a.m. and 6:00 p.m. on Saturday. No work may be performed on the following public holidays: New Year's Day, Independence Day, Thanksgiving, Christmas Day, Memorial Day, and Labor Day. The City of Santa Clarita Department of Community Development may issue a permit for work to be done "after hours" provided that containment of construction noises is provided.

City of Santa Clarita General Plan

The City of Santa Clarita adopted the current General Plan Noise Element in 2011. The following Noise Element policies are applicable to the Project.

Noise Element: Noise Environment

- Goal N 1: A healthy and safe noise environment for Santa Clarita Valley residents, employees, and visitors.
  - Objective N 1.1: Protect the health and safety of the residents of the Santa Clarita Valley by the elimination, mitigation, and prevention of significant existing and future noise levels.
    - Policy N 1.1.1: Use the Noise and Land Use Compatibility Guidelines contained on Exhibit N-8, which are consistent with State guidelines, as a policy basis for decisions on land use and development proposals related to noise.
    - Policy N 1.1.2: Continue to implement the adopted Noise Ordinance and other applicable code provisions, consistent with state and federal standards, which establish noise impact thresholds for noise abatement and attenuation, in order to reduce potential health hazards associated with high noise levels.
    - Policy N 1.1.3: Include consideration of potential noise impacts in land use planning and development review decisions.
    - Policy N 1.1.4: Control noise sources adjacent to residential, recreational, and community facilities, and those land uses classified as noise sensitive.

The Noise Element also acknowledged that noise generated by emergency vehicles is not under the control of the City or the County of Los Angeles. Both the City and County noise ordinances exempt emergency operations from noise regulation. The State has preempted local jurisdictions from controlling noise generated by emergency equipment. The use of sirens on police vehicles, ambulances, and fire trucks cannot be controlled by the City or County. Similarly, emergency flights of helicopters and airplanes cannot be controlled by the City or County. Therefore, noise from these sources is not subject to policies in the Noise Element.

4.5.3. CONSIDERATION AND DISCUSSION OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

In accordance with CEQA Guidelines Appendix G, the Project would have a significant impact on noise if it would result in:

Threshold (a): Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Threshold (b): Generation of excessive groundborne vibration or groundborne noise levels.

Threshold (c): For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the exposure of people residing or working in the project area to excessive noise levels.

To further assist in determining significance under the Appendix G thresholds, the City applies the significance criteria established in the City's General Plan Noise Element and Noise Ordinance, which are as follows:

- Generation of noise in excess of 65 dBA L_{eq} during the day (7:00 a.m. to 7:00 p.m.), or in excess of 55 dBA L_{eq} during the nighttime (7:00 p.m. to 7:00 a.m.), at the property line for any existing residential properties in the Project vicinity or within dedicated exterior use areas of the HNMH campus;
- Erection, construction, demolition, or excavation activities outside of these hours: between 7:00 a.m. and 7:00 p.m., Monday through Friday, and 8:00 a.m. and 6:00 p.m. on Saturday, or on a legal holiday or Sunday;
- An increase of 3 dBA CNEL or more in existing roadway traffic noise levels as a result of the addition of Project-generated traffic on vicinity roadways; or
- A temporary increase of more than 10 dBA above ambient noise levels for construction activities (perceived as a doubling of the background noise level).

In addition, impacts related to excessive ground-borne vibration would be significant if the Project results in generation of excessive ground-borne vibration equal to or in excess of 0.2 inches/second PPV in spaces intended for sleeping (therefore creating annoyance for persons), or the exposure of conventionally built residential structures to greater than 0.3 inches/second PPV. Construction activities within 200 feet and pile driving within 600 feet would be potentially disruptive to vibration-sensitive operations.[8]

The Project Site is not in the vicinity of a private airstrip or airport land use plan, or within 2 miles of a public airport or public use airport. Accordingly, threshold (c) is found to have a less-than-significant impact and is discussed in Section 7, Effects Found not to be Significant, of this Draft SEIR.

METHODOLOGY

On-Site Construction Activities

Construction noise impacts, using the noise sources found in **Table 4.5-3**, were determined by using the Roadway Construction Noise Model (RCNM) developed by the Federal Highway

[8] California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*, 2013.

Administration (FHWA).[9] Input variables for RCNM consist of the receiver/land use types, the equipment type (e.g., backhoe, crane, truck), the number of equipment pieces, the duty cycle for each piece of equipment (i.e., percentage of hours the equipment typically works per day), and the distance from the construction noise source to a noise-sensitive land use or receiver. Appendix C of the Noise Assessment Technical Report (found in **Appendix D** of this Draft SEIR) contains more details on the inputs used in the RCNM model. The RCNM has default duty cycle values for the various pieces of equipment identified in **Table 4.5-3**. These values were derived from an extensive study by the FHWA of typical construction activity patterns. Those default duty cycle values were used for this analysis.

Table 4.5-3
Construction Equipment Per Phase

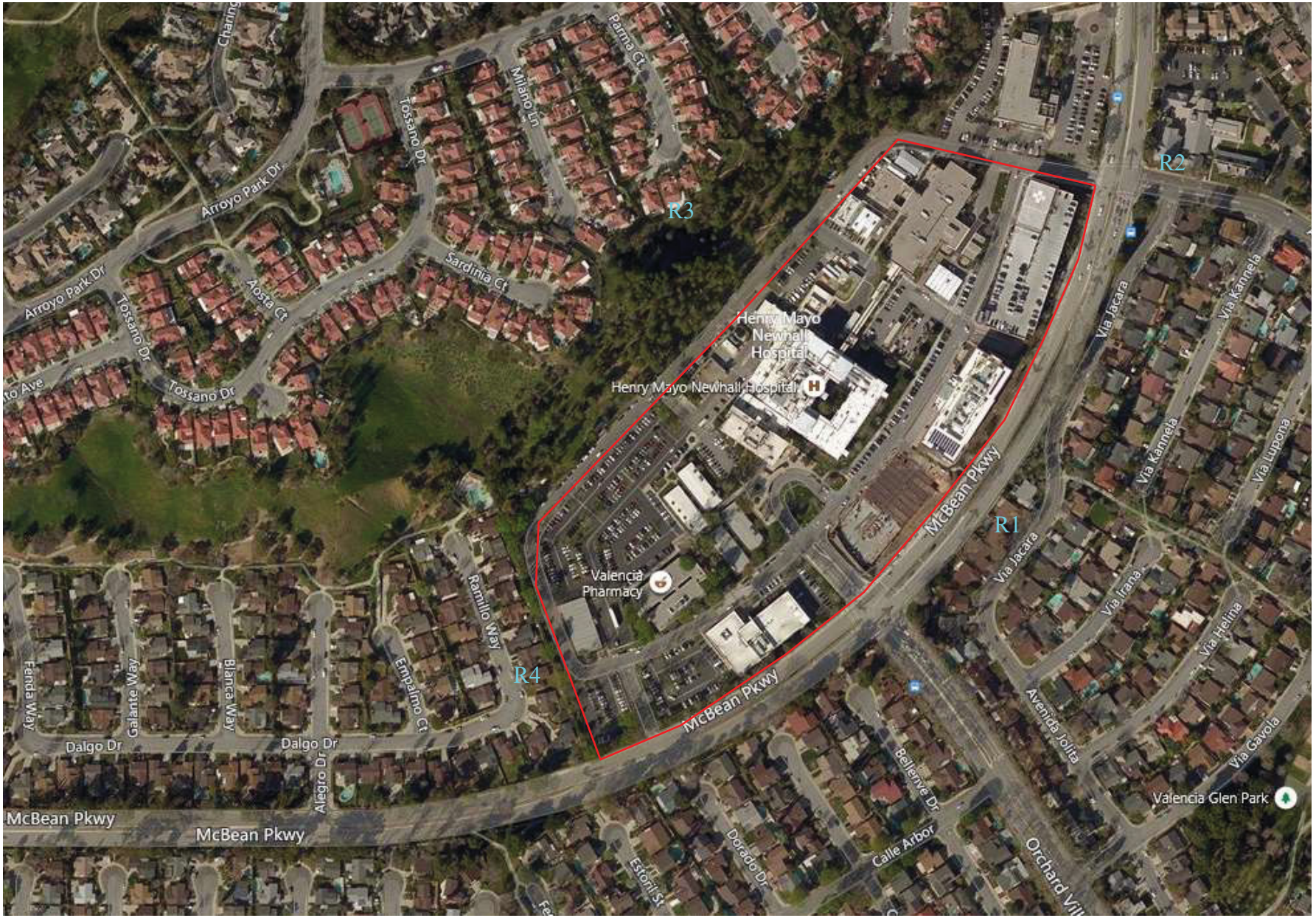
Construction Phase	Equipment Needed
Demolition	Backhoe, Concrete Saw, Dozer, Flat-Bed Truck, Front End Loader, and Tractor
Site Preparation	Backhoe, Flat-Bed Truck, Grader, and Scraper
Grading	Backhoe, Dozer, Flat-Bed Truck, Front End Loader, Grader
Building Construction	Compressor, Crane, Flat-Bed Truck, Fork Lift, Generator, Man-Lift, Tractor, Welder/Torch
Paving	Concrete Truck, Flat-Bed Truck, Pavement Scarifier, Paver, Roller, Tractor

Source: CalEEMod default construction fleet for size and description of construction effort

The closest off-site sensitive receptor, identified as R1 in **Figure 4.5-3**, located approximately 380 feet east of the proposed site, was used to calculate noise impacts from the Diagnostic and Treatment (D&T) Building/Inpatient Building No. 2 (IP-2 Building) construction site. The Main Hospital Building, located 45 feet from the construction site, was also used to determine noise impacts from these buildings. PS-4 is even closer, at 150 feet west, to the off-site sensitive receptor identified above.

However, the above distance separation assumption would not be representative of more typical construction noise because, in general, construction activities would not take place either at the nearest or at the farthest portions of the Project Site but somewhere in between. Thus, in order to provide information on typical construction noise levels, the distance from the nearest receiver to the Project's "acoustic center" was also analyzed. The acoustic center represents the idealized point from which the energy sum of all construction activity noise, near and far, would be centered. The acoustic center is derived by taking the square root of the product of the nearest and the farthest distances. For this Project, the acoustic center for construction activities at the D&T Building/IP-2 Building was found to be approximately 540 feet from the nearest off-site noise sensitive receiver located to the east (R1 on **Figure 4.5-3**). The acoustic center for construction activities at the D&T Building/IP-2 Building was found to be 105 feet from the Main Hospital Building or Inpatient Building No. 1 (IP-1 Building) to the construction area. Given the overall size of the Project Site and the relatively equal distribution of proposed development across the Project Site, noise levels derived from the acoustic center of construction activity would better represent the average noise level exposure across the entire construction process for a given off-site receiver, than using the minimum distance worst-case method.

[9] Federal Highway Administration, *Roadway Construction Noise Model*, 2008.



LEGEND

R# Modeled Receiver Location

Source: Dudek, Noise Assessment Technical Report, 2019

Figure 4.5-3

Modeled Noise Receptor Locations

Michael Baker INTERNATIONAL

Off-Site Construction Noise Traffic

Using acoustical calculations adapted from the FHWA noise prediction model, traffic noise levels were determined for construction worker and heavy truck trips, when added to the existing traffic volumes.

On-Site Operational Noise

Parking Structure Vehicle Movement

A noise measurement program conducted by Urban Crossroads was used as the basis for determining the noise level impacts associated with parking structure vehicle movement.[10] Urban Crossroads conducted sound level measurements for a three-level parking structure associated with Canyon Springs Healthcare Campus in Riverside. The noise levels recorded in the Urban Crossroads study were used to represent parking structure operational noise levels for this component of the Proposed Project. The measurements were performed adjacent to the parking lot vehicle entrance, which captured noise both from entering and exiting vehicles and movements within the lower floors of the structure. Higher levels (beyond the second level) have a much lower contribution to noise levels measured at the ground level, and, therefore, measured noise levels would be representative of parking structures that are 2 levels or higher (including the expanded PS-4).

Rooftop HVAC Equipment

The two proposed buildings would require installation and use of HVAC equipment. For independent zone control, it is assumed that the new buildings would each include one package HVAC unit for each floor (a total of 10), including the basement, with all equipment mounted on the roof of each building. Based on the floor area, it is anticipated that a 10-ton capacity unit would be required to provide climate control for each individual floor of each of the two buildings; consequently, it is anticipated that six 10-ton HVAC package units would be installed on the rooftop of IP-2 Building and four 10-ton units would be installed on the rooftop of the D&T Building. The noise analysis assumed the sound rating for a Lennox SGC240H4M 10-ton capacity HVAC package unit as the sound level reference.

Emergency Backup Generators

The buildings in the Proposed Project would also be served by six new 500-kW diesel generators for backup emergency power needs. The noise analysis assumed the sound rating for a Caterpillar CAT 3512C diesel generator to evaluate operational sound levels. It is assumed because of the noise-sensitive nature of the HMNH campus, the generators would be installed with the available factory sound attenuating enclosures from Caterpillar.

Helicopters/Helipad Operations

The Proposed Project would not include a new helipad. Further, the applicant does not anticipate any increase in the amount of helicopter traffic as a result of this Project. Accordingly, no changes to the use of the emergency helipad at the HMNH campus and the corresponding noise associated with its use would result from implementation of the Proposed Project.

[10] Urban Crossroads, *Canyon Springs Healthcare Campus & Senior Living, Noise Impact Analysis, City of Riverside*, 2017.

Sound Levels from Combined On-Site Operations Noise

Using the reference noise levels to represent the proposed operations that include parking structure vehicle movements, mechanical ventilation (rooftop air conditioning) units, and emergency backup generators (central energy plant), the operational source noise levels that are expected to be generated by the Project were calculated, as experienced at the closest sensitive receiver location on each of the four sides of the HMNH campus. The distance from each noise source to each receiver was determined using the measurement tools available in Google Earth Pro. **Figure 4.5-3** illustrates the location of the modeled closest residential receiver on each side of the HMNH campus.

The operational noise level calculations account for the distance attenuation provided due to geometric spreading when sound from a localized stationary source (i.e., a point source) spreads uniformly outward in a spherical pattern. With geometric spreading, sound levels decrease at a rate of 6 dB for each doubling of distance from a point source. The noise level contribution from each source at each of the closest four off-site receivers was calculated separately, and then the individual sound level contributions at each receiver were summed using appropriate logarithmic calculations.

Off-Site Operational Noise

Acoustical calculations were performed for roadway segments identified in the Traffic Impact Assessment as those that could be affected by implementation of the Project, using standard noise modeling equations adapted from the FHWA noise prediction model.[11] The modeling calculations take into account the posted vehicle speed, average daily traffic volume, and the estimated vehicle mix. The model assumed standard exterior attenuation rates for "hard sites" (i.e., areas of pavement or compacted dirt adjacent to the roadway).

Noise levels are indicated at 50 feet from the centerline of the outermost lane for each roadway segment. Noise levels at distances greater than 50 feet from the centerline would be lower due to attenuation provided by increased distance from the noise source. Generally, noise from heavily traveled roadways would experience a decrease of approximately 3 dBA for every doubling of distance from the roadway where hard site conditions exist adjacent to the roadway. The noise model does not take into account the sound-attenuating effect of intervening structures, barriers, vegetation, or topography. Therefore, the noise levels predicted by the model are conservative.

Construction and Operational Vibration

Groundborne vibration impacts due to the construction and operation of the Proposed Project were evaluated by identifying potential vibration sources, estimating the vibration levels caused by these sources at nearby sensitive receptors, and comparing these levels to the applicable significance criteria.

[11] Linscott, Law & Greenspan, *Henry Mayo Newhall Hospital Amended Specific Plan Traffic Study*, 2019.

PROJECT IMPACTS

Threshold (a): Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Construction Noise

Construction of the Proposed Project would generate noise that could expose nearby receptors to elevated noise levels that may disrupt communication and routine activities. The magnitude of the impact would depend on the type of construction activity, equipment, duration of the construction, distance between the noise source and receiver, and intervening structures.

On-Site Construction Activities

D&T Building/IP-2 Building

Using the provided construction information, the RCNM construction noise model was used to predict noise from on-site construction activities. The results are summarized in **Table 4.5-4**. As shown, the highest average noise levels at the closest off-site residence from construction of the D&T Building/IP-2 Building are predicted to range from approximately 66 dBA L_{eq} (during site preparation and grading) to 70 dBA L_{eq} (during building construction), while the maximum instantaneous noise level would range from 67 dBA L_{max} to 72 dBA L_{max}. The identified highest average noise level is considered to be a peak exposure while the construction activity is taking place along the eastern construction site boundary (i.e., closest to the nearest off-site receiver). The average construction noise levels at the closest off-site receiver (for the previously described D&T Building/IP-2 Building acoustic center) range from approximately 63 dBA L_{eq} (during site preparation and grading) to approximately 67 dBA L_{eq} (during building construction. The average noise levels (based upon the acoustic center) are considered a better representation of the overall noise exposure experience for adjacent receivers over the duration of each construction phase. The maximum noise levels at the adjacent closest residence based on the acoustic center would range from 64 dBA L_{max} to 69 dBA L_{max}.

Table 4.5-4
Construction Noise Summary of Results

Receiver Location/ Description	Land Use	Demolition dBA L_{eq} (dBA L_{max})	Site Preparation dBA L_{eq} (dBA L_{max})	Grading dBA L_{eq} (dBA L_{max})	Building Construction dBA L_{eq} (dBA L_{max})	Paving dBA L_{eq} (dBA L_{max})
Nearest off-site receiver (R1) to D&T/IP-2 site	Residential	69 (72)	66 (67)	66 (67)	70 (67)	68 (72)
Nearest off-site receiver (R1) to D&T/IP-2 acoustic center (540')	Residential	65 (69)	63 (64)	63 (64)	67 (64)	65 (69)
Nearest off-site receiver (R1) to PS-4 site	Residential	77 (80)	74 (75)	75 (76)	78 (76)	76 (80)
Nearest on-site receiver (MHB/IP-1) to D&T/IP-2 site	Hospital	87 (91)	85 (86)	85 (86)	88 (86)	87 (90)
Nearest on-site receiver (MHB/IP-1) to D&T/IP-2 acoustic center (105')	Hospital	80 (83)	78 (79)	78 (79)	81 (79)	79 (83)

Source: FHWA, Roadway Construction Noise Model. Refer to Appendix C of the Noise Technical Report.
Notes: D&T/IP-2 = Diagnostic and Treatment Building and Inpatient Building No. 2
MHB/IP-1 = Main Hospital Building and Inpatient Building No. 1

In reviewing the results in **Table 4.5-4**, it can be seen that the average construction noise levels at the closest residence, R1, from construction of the D&T Building/IP-2 Building would remain slightly below the ambient noise level of 70 dBA L_{eq}. Accordingly, construction of the D&T Building/IP-2 Building would not result in significant noise impacts on the closest off-site residences.

RCNM was also used to predict construction noise levels for the closest on-site noise-sensitive use, the adjacent Main Hospital Building and IP-1 Building. The results for on-site construction noise levels are also summarized in **Table 4.5-4**. As shown, the highest average noise levels at the Main Hospital Building/IP-1 Building from construction are predicted to range from approximately 85 dBA L_{eq} (during site preparation and grading) to 88 dBA L_{eq} (during building construction), while maximum noise level values would range from 86 dBA L_{max} to 91 dBA L_{max}. The identified highest average noise level is considered to be a peak exposure while the construction activity is taking place along the western construction site boundary (i.e., closest to the Main Hospital Building/IP-1 Building). The average construction noise levels at the Main Hospital Building/IP-1 Building (based upon the acoustic center) range from approximately 78 dBA L_{eq} (during site preparation and grading) to approximately 81 dBA L_{eq} (during building construction). The average noise levels (based upon the acoustic center) are considered a better representation of the overall noise exposure levels at the Main Hospital Building/IP-1 Building southeastern façade over the duration of each construction phase. The maximum noise levels at the Main Hospital Building/IP-1 Building based on the acoustic center would range from 79 dBA L_{max} to 83 dBA L_{max}.

Again, with reference to **Table 4.5-4**, the construction noise levels at the adjacent southeastern façades of the Main Hospital Building and IP-1 Building would range from approximately 85 dBA L_{eq} (during site preparation and grading) to 88 dBA L_{eq} (during building construction), with maximum noise levels up to 91 dBA L_{max}. The Main Hospital Building and IP-1 Building exterior shells could achieve an approximately 25 dBA attenuation, from exterior to interior noise levels. Accordingly, patients would generally be exposed to construction noise levels approximating 65 dBA L_{eq}, which would not typically interfere with conversation but may disrupt the rest of hospital patients during the day. However, more importantly, these short-term construction noise levels would exceed the measured ambient noise level of 55 dBA L_{eq} near the southeastern corner of the Main Hospital Building by up to 35 dBA. Consequently, short-term construction noise is considered a significant impact on patients receiving in-patient care in the Main Hospital Building and in IP-1 Building.

PS-4

The PS-4 construction site is much closer to the nearest off-site residence (R1 in **Figure 4.5-3**) than the D&T Building/IP-2 Building site. PS-4 is located within 150 feet of the closest residences across McBean Parkway. As shown in **Table 4.5-4**, the highest average noise levels at the closest off-site residence from construction at PS-4 are predicted to range from approximately 74 dBA L_{eq} (during site preparation) to 78 dBA L_{eq} (during building construction), while the maximum instantaneous noise level (L_{max}) would range from 75 dBA L_{max} to 80 dBA L_{max}.

Construction of PS-4 would result in average noise levels ranging up to 78 dBA L_{eq}, with maximum noise levels up to 80 dBA L_{max}. This maximum construction noise level would exceed the ambient noise level of 70 dBA L_{eq} at the residence by 10 dBA. Consequently, construction of PS-4 would result in a significant short-term impact on the closest off-site residences.

Off-Site Construction Noise

Construction traffic levels would vary by construction phase, with a peak of 114 daily round trips for construction workers and 52 daily round trips for medium and heavy trucks occurring during the building construction phase. The peak number of heavy truck trips daily would occur during grading, with 60 round trips for hauling soil export; however, only 10 round trips for construction worker vehicles would occur during the grading phase. Using acoustical calculations adapted from the FHWA noise prediction model, traffic noise levels were determined for construction worker and heavy truck trips, when added to the existing traffic volumes. All of the construction trips are expected to travel on McBean Parkway, which currently carries 28,000 average daily trips (ADT) between Orchard Village and Rockwell Canyon. The addition of construction-related traffic during the peak construction period would increase traffic noise levels along this roadway by 0.3 dBA L_{eq}. Therefore, while the noise from individual truck pass-by events may be discernible to a person nearby, construction traffic would not substantially increase average traffic noise levels above existing (the increase would be well below the 3-dBA significance threshold). As such, construction-related traffic noise is deemed a less than significant impact.

Operational Noise

On-Site Operational Noise

The implementation of the Project would also result in changes to existing noise levels on the Project Site by developing new stationary sources of noise, including introduction of HVAC equipment, a parking structure capacity increase, and emergency electrical generators. These sources may affect noise-sensitive vicinity land uses of the Project Site.

Parking Structure Vehicle Movement

The parking structure short-term noise level measurements indicate that the parking structure vehicle movement generates a noise level of 60 dBA L_{eq} at a uniform reference distance of 50 feet. To be conservative in the analysis, parking structure vehicle movement within the Project Site is expected to operate for 60 minutes during typical hourly daytime and nighttime conditions, thereby resulting in an hourly noise level of 60 dBA L_{eq} at 50 feet from the entrance.

Rooftop HVAC Equipment

Noise level data provided by the manufacturer was used to determine the noise levels which would be generated by each of the HVAC package units. The Lennox SGC240H4M 10-ton package HVAC unit has a sound power rating of 90 dBA.[12] It is assumed that a minimum 3.5-foot-tall parapet would extend along the perimeter of the roof, but acoustical calculations do not include sound level reductions associated with the noise barrier effect of the parapet. The noise levels from HVAC equipment on off-site sensitive receptors, as shown in **Table 4.5-5**, would range from 38 to 48 dBA L_{eq}.

[12] Lennox, *Product Specifications*, 2019, p. 24.

Table 4.5-5
Mechanical and Parking Structure Operations Noise Level Analysis
Summary of Results – Average Noise Levels (dBA L_{eq})

Receiver	Operational Noise from Individual Noise Sources and Combined at Closest Residences					
	HVAC	Generator	Parking	Combined	Existing Ambient	Operations + Ambient
R1	48	52	34	54	70	70
R2	47	48	34	51	70	70
R3	38	40	33	43	50	51
R4	47	48	51	54	65	65

Sources: Ambient noise levels from traffic noise assessment using calculations based on TNM 2.5; mechanical equipment assessment using exterior attenuation rates and manufacturer sound level data. Refer to Appendix C of the Noise Assessment Technical Report.

Emergency Backup Generators

The proposed buildings would also be served by six new 500-kW diesel generators for backup emergency power needs. These six generators would be installed on the roof of the D&T Building. This report uses the sound rating for a Caterpillar CAT 3512C diesel generator to evaluate operational sound levels for this equipment. It is assumed that because of the noise-sensitive nature of the HMNH campus, the generators would be installed with the available factory sound attenuating enclosures from the manufacturer. Accordingly, the generator in the factory-provided enclosure would produce a sound level of 67.0 dBA L_{eq} at a noise source height of 10 feet.

Sound Levels from Combined On-Site Noise Sources

Using the reference noise levels to represent the proposed operations that include parking structure vehicle movements, mechanical ventilation (rooftop air conditioning) units, and emergency backup generators, the combined operational source noise levels that are expected to be generated by the Project were calculated, as experienced at the closest sensitive receiver location on each of the four sides of the HMNH campus. As discussed above, the Proposed Project would not include a new helipad and would not result in an increase in helicopter air traffic. Accordingly, no changes to the use of the emergency helipad at the HMNH campus and the corresponding noise associated with its use would result from implementation of the Proposed Project.

Assuming all the pieces of equipment are operating simultaneously for a minimum period of one hour and with steady vehicle movement activity for that same hour in PS-4, the worst-case calculated noise level at the closest receiver on each side of the HMNH campus is presented in **Table 4.5-5**.

The results of the HVAC equipment, emergency generators, and parking structure operations noise analysis indicate that the Proposed Project would comply with the City of Santa Clarita Municipal Code noise limits (Chapter 11.44.040). Operational noise from the Project would comply with even the nighttime limit of 55 dBA L_{eq} applicable to residential land uses, at the property boundary of the closest existing residence in each direction from the HMNH campus. In addition, Project operational noise levels would increase existing ambient noise levels at the closest adjacent residences by no more than 1 dBA L_{eq}, which is an imperceptible change. As such, the Project would not generate noise at the closest neighboring residential properties that exceeds the residential zone noise limits. Therefore, operational noise impacts would be less than significant.

The closest dedicated outdoor use area on the HMNH campus is a set of benches within the driveway loop at the entrance to the HMNH campus. These benches are approximately 125 feet from PS-4 and

on the opposite side of the Main Hospital Building from the location of the D&T Building/IP-2 Building. At this distance, the combined operational noise from PS-4 would be no greater than 54 dBA L_{eq}, thereby remaining in compliance with the nighttime exposure standard of 55 dBA L_{eq} that is conservatively applied to exterior use areas of the HMNH campus. Therefore, on-site operational noise levels are deemed less than significant.

Off-Site Operational Noise

The primary noise-related effect that most commercial projects produce is a potential for off-site increases in traffic, which is the main source of noise in most urban areas. Acoustical calculations were performed for each of the scenarios evaluated in the Project's traffic impact assessment (i.e., existing and existing plus Project, and opening day and opening day plus Project) to determine the potential for roadway traffic noise level increases from Project implementation. **Table 4.5-6** presents the noise level results for each scenario.

Table 4.5-6
Noise Levels for Vicinity Roadways[a]

Street Segment	Existing	Existing + Project	Difference	Opening Year (2022)	Opening Year (2022) + Project	Difference
McBean Pkwy, north of Magic Mtn Pkwy	74.5	74.5	**0**	74.9	74.9	**0**
McBean Pkwy between Magic Mtn to Valencia Blvd	72.5	72.5	**0**	72.9	72.9	**0**
McBean Pkwy between Valencia Blvd to Orchard Village Rd	71.8	71.8	**0**	72.2	72.2	**0**
McBean Pkwy between Orchard Village Rd to Rockwell Cyn Rd	70.6	70.7	**0.1**	71.0	71.1	**0.1**
McBean Pkwy, west of Rockwell Cyn Rd	72.1	72.2	**0.1**	72.5	72.6	**0.1**
Magic Mtn Pkwy, west of McBean Pkwy	70.4	70.4	**0**	70.8	70.8	**0**
Magic Mtn Pkwy between McBean Pkwy to Valencia Blvd	69.4	69.4	**0**	69.8	69.8	**0**
Magic Mtn Pkwy, east of Valencia Blvd	68.1	68.1	**0**	68.5	68.5	**0**
Valencia Blvd, west of McBean Pkwy	72.9	72.9	**0**	73.3	73.3	**0**
Valencia Blvd between McBean Pkwy to Magic Mtn Pkwy	72.4	72.4	**0**	72.8	72.8	**0**
Valencia Blvd, east of Magic Mtn Pkwy	73.5	73.5	**0**	73.9	73.9	**0**
Orchard Village Rd between McBean Pkwy to Wiley Cyn Rd	70.4	70.5	**0.1**	70.8	70.9	**0.1**
Orchard Village Rd between Wiley Cyn Rd to Lyons Ave	69.2	69.2	**0**	69.6	69.6	**0**
Wiley Cyn Rd between Lyons Ave to Tournament Rd	68.4	68.4	**0**	68.8	68.8	**0**
Wiley Cyn Rd between Tournament Rd to Orchard Village Rd	67.6	67.6	**0**	68.0	68.0	**0**
Wiley Cyn Rd, east of Orchard Village Rd	66.2	66.3	**0.1**	66.6	66.7	**0.1**
Lyons Ave, west of Wiley Cyn Rd	71.6	71.6	**0**	72.0	72.0	**0**
Lyons Ave between Wiley Cyn Rd to Orchard Village Rd	71.0	71.0	**0**	71.4	71.4	**0**
Lyons Ave, Orchard Village Rd to Newhall Ave	71.1	71.1	**0**	71.5	71.5	**0**

Source: Linscott, Law & Greenspan, Henry Mayo Newhall Hospital Amended Specific Plan Traffic Study, 2019 and Federal Highway Administration, TNM 2.5.

[a] dBA CNEL at 50 feet from centerline of outermost lane.

The Proposed Project, along with future regional growth and other projects to be developed within the Project vicinity, would result in the addition of vehicle trips that would increase traffic noise. A potentially significant Project impact would occur where an increase of 3 dB CNEL or more is predicted. As shown in **Table 4.5-6**, the Proposed Project would result in traffic noise increases of well below 1 dB CNEL on each of the examined roadway segments, when comparing existing to existing plus Project noise levels. As such, the Project would result in less-than-significant Project-specific traffic noise impacts.

In summary, as shown in **Table 4.5-7**, the Proposed Project would have a less-than-significant noise impact with regard to off-site construction noise, on-site operation noise, and off-site operation noise. The only area that would have a significant noise impact would be during on-site construction as short-term construction noise levels would exceed the ambient noise level of 55 dBA L_{eq} near the southeastern corner of the Main Hospital Building by up to 35 dBA. On-site operational noise was evaluated for stationary sources, such as HVAC systems and emergency backup generators on the D&T Building/IP-2 Building, as well as stationary sources from PS-4 caused by traffic within the parking structure itself. None of these Project components would rise to a significant impact either individually or combined. Off-site operational impacts were evaluated by determining changes in traffic noise on multiple roadway segments in the vicinity of the Project Site. None of the segments evaluated would have an increase in noise that would be perceptible to the human ear (3 dBA), and, therefore, noise impacts would be less than significant.

Table 4.5-7
Overall Noise Impact Summary

Noise Source	Average Noise Level at Sensitive Receptors	Exceeds Threshold?
On-Site Construction Activities		
Demolition	65-87 dBA Leq	Yes
Site Preparation	63-85 dBA Leq	Yes
Grading	63-85 dBA Leq	Yes
Building Construction	67-88 dBA Leq	Yes
Paving	65-87 dBA Leq	Yes
Off-Site Construction		
Construction Worker and Heavy Truck Trips	+0.3 dBA CNEL over Ambient	No
On-Site Operational Activities		
Parking Structure Vehicle Movement	33-51 dBA L_{eq}	No
Rooftop HVAC Equipment	38-48 dBA L_{eq}	No
Emergency Backup Generators	40-52 dBA L_{eq}	No
Combined On-Site Noise Sources	43-54 dBA L_{eq}	No
Off-Site Operation		
Vehicle Trips	+0.1 dBA CNEL over Ambient	No

Source: Data summary derived from Tables 4.5-4 through 4.5-6 above.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

On-Site Construction

The 2008 Master Plan EIR Noise Section determined that the short-term on-site construction noise impacts would remain significant and unavoidable despite mitigation measures. During the 15-year buildout of the Master Plan, residences in all directions would be exposed to potentially

significant levels of noise. Due to construction on the HMNH campus, homes to the east of the HMNH campus would have an exposure of 81 dBA L_{max}; those to the west would be exposed to 86 dBA L_{max}; those to the north would be exposed to 79 dBA L_{max}; those to the south would be exposed to 86 dBA L_{max}; and the nearest residence to PS-4 would be exposed to 84 dBA L_{max}. All of these exposures are more than 10 dBA over the ambient noise for these locations. The 2008 Master Plan EIR identified two mitigation measures (**Mitigation Measures N1 and N2**) to reduce the construction noise impacts. However, despite these mitigation measures, construction noise impacts were determined to remain significant and unavoidable.

The Proposed Project would also have short-term on-site construction noise impacts that would remain significant and unavoidable despite mitigation measures. The construction of PS-4 would result in peak noise at 80 dBA L_{max}, which is 10 dBA above the ambient noise of 70 dBA L_{eq}. While the construction of the D&T Building/IP-2 Building would not result in a significant noise impact on the nearest residence, it would still have a significant impact on other buildings within the HMNH campus. The construction of these buildings would result in maximum noise levels up to 90 dBA L_{max}, which is 35 dBA above the 55 dBA L_{eq} ambient noise level near the southeastern corner of the Main Hospital Building. The 2008 Master Plan did not consider the construction noise impacts on portions of the HMNH campus itself. However, the maximum noise level resulting from the construction of the proposed D&T Building/IP-2 Building would be well above the threshold of 10 dBA and would cause a significant impact. While the mitigation measures for this Proposed Project would reduce the severity of on-site construction noise, the impact remains significant and unavoidable.

The temporary on-site construction noise impacts from both the 2008 Master Plan and the Proposed Project would be significant and unavoidable despite mitigation measures. The nearest residences to the proposed construction would experience approximately the same level of noise impact from both the Master Plan and the Proposed Project. The Main Hospital Building would experience a noise level up to 90 dBA L_{max} due to construction of the D&T Building/IP-2 Building, which is 4 dBA higher than the noise impact to the nearest residences to the west and south as identified in the 2008 Master Plan EIR.

Both the 2008 Master Plan Project and the Proposed Project have significant and unavoidable on-site construction noise impacts. Due to the similarity in severity of these impacts, the combination of the two projects would not produce a noticeable difference in impact.

Off-Site Construction

The 2008 Master Plan EIR takes into consideration the short-term noise impacts that would occur due to construction crew commutes and the transport of construction equipment and materials to and from the Project Site. The Master Plan EIR identified a high single-event noise exposure potential with an L_{max} of 87 dBA with trucks passing at 50 feet. However, the 2008 Master Plan EIR stated that the increase in noise would be imperceptible to human ears, and the impact would not be significant.

The Proposed Project, as mentioned above, would also result in increases in noise due to construction crew commutes and the transport of construction equipment and materials. These trips would be on McBean Parkway and, during the peak construction period, would result in an increase of 0.3 dBA L_{eq}.

On-Site Operation

The 2008 Master Plan EIR determined that noise impacts from operational stationary sources would be less than significant, except for on-site Medical Office Buildings (MOB) 1 and 2. These buildings, which are on McBean Parkway, would require a mitigation measure to bring the level of noise impacts to these sensitive receptors to less than significant. The Master Plan EIR based this finding on the location of the stationary sources, the frequency that these sources emit noise, and the distance from these sources to the nearest sensitive receptors.

The Master Plan EIR considered noises associated with the loading and unloading of delivery trucks, the movement of trucks on driveways, and parking lot activities for on-site operational noise impacts. While it did not find any significant impacts due to on-site operational noise, the Master Plan EIR identified a mitigation measure to require MOB-1 and MOB-2 to use mechanical ventilation to ensure that windows remain closed so that the 45-dBA interior noise standard for on-site MOBs is met due to traffic noise along McBean Parkway.

The Noise Assessment Technical Report prepared for this Project, included in **Appendix D** of this Draft SEIR, addressed more possible sources of on-site operational noise. While it did include noise from parking in PS-4, this SEIR also examined the noise generated by backup generators and HVAC systems at the D&T Building/IP-2 Building site. In calculating the combined noise levels from all on-site operational noise sources, it was determined that any increase in noise would be imperceptible to the human ear. As discussed above, these on-site operational noise impacts would be less than significant.

The mitigation required in the 2008 Master Plan EIR would still be in effect, ensuring the impact on MOB-1 and MOB-2 remains less than significant. Considering that both the 2008 Master Plan and this SEIR found on-site operational noise impacts to be less than significant, the on-site operational impacts of the D&T Building, the IP-2 Building, and PS-4 would be less than significant.

Off-Site Operation

The 2008 Master Plan EIR identified that the operational noise impact off-site would be less than significant. While several roadway segments demonstrated an increase in noise that would be attributed to implementation of the Master Plan, the largest increase was 0.5 dBA. As the 2008 Master Plan EIR did not identify an increase in off-site operational noise of at least 3 dB, the change in sound would be imperceptible to the human ear and the operation of the components of the Master Plan would have a less-than-significant increase in traffic noise. When examining the traffic noise levels under the Master Plan and the Proposed Project, there is little to no increase in the off-site noise impacts associated with the operation of the Project. These changes are again imperceptible to the human ear, and off-site operational noise impacts would be less than significant.

Mitigation Measures

The 2008 Master Plan EIR identified the following mitigation measures applicable to short-term significant construction noise impacts to off-site residences from PS-4 construction; they would also be applicable to address on-site impacts to the Main Hospital Building and IP-1 Building from construction of the D&T Building/IP-2 Building:

N1 During all site excavation and grading, the Project applicant shall require the Project contractor(s) to equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards.

N2 The Project applicant shall require the Project contractor(s) to locate equipment staging in areas that would create the greatest distance between construction-related noise sources and noise-sensitive receptors nearest the Project Site during all Project construction, to the extent practicable.

In addition, the following mitigation measure is recommended to further reduce on-site noise impacts to the Main Hospital Building and IP-1 Building from construction of the D&T Building/IP-2 Building:

S-N1 The Project contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the Project Site.

Level of Significance After Mitigation

In examining the PS-4 construction noise levels at the closest residences, the 2008 EIR concluded that construction noise impacts would remain significant, even after the incorporation of the above mitigation measures. In that case, construction noise was estimated to exceed the threshold by 4 dBA. Noise levels from construction of the D&T Building/IP-2 Building as experienced in the vicinity of the Main Hospital Building and IP-1 Building would exceed the ambient noise level by up to 35 dBA. Individual noise control methods for construction activities typically achieve a reduction in the range of 5 to 6 dBA apiece. The suite of noise controls contained in **Mitigation Measures N1**, **N2,** and **S-N1** would likely be able to achieve an overall reduction of not more than 15 dBA L_{eq} at the façades of the adjacent Main Hospital Building and IP-1 Building. Feasible mitigation measures do not exist that would reduce construction noise levels at the Main Hospital Building and IP-1 Building southeastern façade by 35 dBA to a level of 65 dBA L_{eq}, 10 dBA above ambient. Consistent with the 2008 EIR conclusions, short-term construction noise impacts would remain significant and unavoidable and would not result in any additional impacts beyond those identified in the 2008 Master Plan EIR.

Threshold (b): Result in the generation of excessive groundborne vibration or groundborne noise levels.

Construction Vibration

The main concern associated with ground-borne vibration is annoyance; however, in extreme cases, vibration can cause damage to buildings, particularly those that are old or otherwise fragile. Some common sources of ground-borne vibration are trains and construction activities, such as blasting, pile-driving, and heavy earth-moving equipment. The primary source of ground-borne vibration occurring as part of the Project is construction activity.

During land clearing and construction activities for the Proposed Project, groundborne vibration would be produced by heavy-duty construction equipment. The most important equipment relative to generation of vibration, and the vibration levels produced by such equipment, is illustrated in **Table 4.5-8**.

Table 4.5-8
Vibration Velocities for Typical Construction Equipment

Equipment	PPV at 25 Feet (Inches per Second)
Sonic Pile Driver	0.170
Large Bulldozer	0.089
Loaded Trucks	0.076
Drill Rig/Auger	0.089
Jackhammer	0.035
Small Bulldozer	0.003

Source: Caltrans, Transportation and Construction Vibration Guidance Manual, 2013

As shown in **Table 4.5-8**, a large bulldozer generates vibration levels of 0.089 in/sec PPV at a distance of 25 feet. The nearest off-site residences to the Project Site would be no closer than 150 feet from the edge of the closest construction activity for PS-4. At this distance, vibration levels from the use of a large bulldozer would be 0.006 in/sec PPV. Vibration levels at these receptors would not approach the Caltrans "sensitive person" annoyance level of 0.2 in/sec. They would also be even farther below the building damage threshold of 0.5 in/sec PPV. As such, construction-related vibration associated with the Proposed Project would not be substantial and would not lead to annoyance or structural damage for the existing residences in the Project vicinity. On-site construction-related vibration impacts to off-site receptors would, therefore, be less than significant.

The closest distance between on-site construction and existing buildings would be 45 feet (construction of D&T Building/IP-2 Building with respect to either the Main Hospital Building or IP-1 Building). At this distance, vibration levels from the use of a large bulldozer would be 0.03 in/sec PPV. Vibration levels at the Main Hospital Building or IP-1 Building would not approach the Caltrans "sensitive person" annoyance level of 0.2 in/sec (vibration would be one order of magnitude below this level). Vibration levels would also be below the building damage threshold of 0.5 in/sec PPV. As such, construction-related vibration associated with the Proposed Project would not be substantial and would not lead to annoyance or structural damage for the existing structures on the HMNH campus closest to the construction zones. Because construction would be undertaken on behalf of Henry Mayo Hospital, it is reasonable to assume adequate coordination between the construction contractor and hospital administration would occur in order to accommodate activities particularly prone to vibration interference during the construction process. On-site vibration impacts are, therefore, considered to be less than significant.

Operations Vibration

Long-term sources of vibration include trains, heavy equipment involving rotating components (e.g., industrial compressors), and equipment involving percussion or impacts between components (e.g., die presses). While the Proposed Project would include HVAC equipment with air compressor components, such components are limited in scale and would not be expected to produce substantial vibration. These pieces of equipment are proposed to be installed on the roof of the D&T Building/IP-2 Building and would typically be designed with vibration-isolation mounting systems (i.e., employing dampeners or springs). The magnitude of vibration, which would be produced by Project components, is such that vibration would not reach portions of on-site structures occupied by hospital patients and would have no potential to affect off-site structures or residents. Long-term vibration impacts are, therefore, considered less than significant.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

The 2008 Master Plan EIR did not address vibrational impacts in its analysis. However, due to similarities in the nature of construction activities, it can be assumed that the vibrational impacts from both construction and operation would also be less than significant.

Mitigation Measures

Impacts related to ground-borne vibration impact would be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts related to ground-borne vibration impact would be less than significant without mitigation.

4.5.4. CUMULATIVE IMPACTS

Cumulative noise and vibrational impacts consider the development of the Proposed Project in combination with nearby growth and development through 2035 (i.e., the buildout year considered in the Santa Clarita Valley Consolidated Traffic Model). Due to the localized impact of noise and vibration, as well as the decrease in magnitude as distance from the source increases, only projects in the immediate vicinity could combine with the Project to result in cumulatively considerable noise impacts.

NOISE

Cumulative Construction Noise

As identified in Chapter 4.0, Environmental Analysis, of this SEIR, none of the related projects in the City are located within 1 mile of the Project Site. Therefore, no other reasonably foreseeable projects in the immediately surrounding area would result in construction noise that would combine with the impacts during the construction of the D&T Building/IP-2 Building. The Proposed Project would not contribute to a significant cumulative impact concerning short-term, construction-related noise.

Operational Noise

As shown in **Table 4.5-9**, the difference between Future Year 2035 without and with the Project would not exceed 1.2 dBA. Additionally, the contribution of the Project to noise levels along every evaluated roadway segment in the Year 2035 scenario would be 0.1 dBA or less. These noise increases would not be perceptible to the human ear. Therefore, the Project's contribution to cumulative noise would not be considerable, and cumulative operational noise impacts would be less than significant.

Table 4.5-9
Noise Levels for Vicinity Roadways[a]

Street Segment	Existing	Future (2035) without the Project	Future (2035) with the Project	Project Contribution	Cumulative Impact (Future with Project Minus Existing)
McBean Pkwy, north of Magic Mtn Pkwy	74.5	75.6	75.6	0	1.1
McBean Pkwy between Magic Mtn to Valencia Blvd	72.5	73.6	73.6	0	1.1
McBean Pkwy between Valencia Blvd to Orchard Village Rd	71.8	72.9	73.0	0	1.2
McBean Pkwy between Orchard Village Rd to Rockwell Cyn Rd	70.6	71.7	71.8	0.1	1.2
McBean Pkwy, west of Rockwell Cyn Rd	72.1	73.2	73.2	0	1.1
Magic Mtn Pkwy, west of McBean Pkwy	70.4	71.5	71.5	0	1.1
Magic Mtn Pkwy between McBean Pkwy to Valencia Blvd	69.4	70.5	70.5	0	1.1
Magic Mtn Pkwy, east of Valencia Blvd	68.1	69.2	69.2	0	1.1
Valencia Blvd, west of McBean Pkwy	72.9	74.0	74.0	0	1.1
Valencia Blvd between McBean Pkwy to Magic Mtn Pkwy	72.4	73.5	73.5	0	1.1
Valencia Blvd, east of Magic Mtn Pkwy	73.5	74.6	74.6	0	1.1
Orchard Village Rd between McBean Pkwy to Wiley Cyn Rd	70.4	71.5	71.5	0	1.1
Orchard Village Rd between Wiley Cyn Rd to Lyons Ave	69.2	70.3	70.3	0	1.1
Wiley Cyn Rd between Lyons Ave to Tournament Rd	68.4	69.5	69.5	0	1.1
Wiley Cyn Rd between Tournament Rd to Orchard Village Rd	67.6	68.7	68.7	0	1.1
Wiley Cyn Rd, east of Orchard Village Rd	66.2	67.3	67.4	0.1	1.2
Lyons Ave, west of Wiley Cyn Rd	71.6	72.7	72.7	0	1.1
Lyons Ave between Wiley Cyn Rd to Orchard Village Rd	71.0	72.1	72.1	0	1.1
Lyons Ave, Orchard Village Rd to Newhall Ave	71.1	72.2	72.2	0	1.1

Source: Linscott, Law & Greenspan, Henry Mayo Newhall Hospital Amended Specific Plan Traffic Study, 2019 and Federal Highway Administration, TNM 2.5.

[a] dBA CNEL at 50 feet from centerline of outermost lane.

VIBRATION

Impacts related to ground-borne vibrations during construction and operation of the Proposed Project were determined to be less than significant. Due to the localized nature of vibration impacts, cumulative vibration impacts would be less than significant.

This section of the Draft SEIR analyzes the potential traffic and circulation impacts caused by the construction and operation of the Proposed Project. Linscott, Law & Greenspan, Engineers (LLG) prepared a Traffic Impact Study for the Proposed Project, which is included in **Appendix E** of this Draft SEIR. In addition, Stantec prepared a transportation analysis based on vehicle miles traveled (VMT) as required by Senate Bill (SB) 743, which is included in **Appendix F** of this Draft SEIR. A discussion of the environmental setting, the regulatory framework, the Project's impacts, and any necessary mitigation measures is provided below.

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743, which went into effect in January 2014, and directed the Governor's Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic levels of service (LOS). This started a process that changed transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

In December 2018, OPR released the "Technical Advisory on Evaluating Transportation Impacts in CEQA" (Technical Advisory). Of particular relevance was the updated text of the proposed new CEQA Guidelines Section 15064.3, which established vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts.

Based on these changes, in May 2020, the City adopted revised Transportation Analysis Guidelines that define a methodology for VMT analysis and to establish new significant impact thresholds with regard to transportation impacts and CEQA.[1] The City's Guidelines are consistent with OPR's Technical Advisory. However, while CEQA requirements have changed, the City can continue to dictate the types of analysis to be conducted for land use and transportation projects, such as continuing to include LOS. While LOS would no longer constitute a CEQA impact, it can still be used to inform decisionmakers on the overall effects of a project. Accordingly, the results of LLG's Traffic Impact Study involving intersection LOS are presented below for informational purposes only.

4.6.1. ENVIRONMENTAL SETTING

EXISTING ROADWAY SYSTEM

The Proposed Project is located in the northwest portion of the intersection of McBean Parkway and Orchard Village Road. Vehicular access to the Project Site is provided via McBean Parkway at the intersections of Orchard Village Road and Avenida Navarre. The proposed parking structure expansion, as well as Lots D, I, and portion of Lot H, where Inpatient Building No. 2 (IP-2 Building) and the Diagnostic and Treatment Building (D&T Building) would be constructed, are accessed via a private street on the campus interior, which parallels McBean Parkway. The driveways located at Orchard Village Road and Avenida Navarre are signalized and accommodate full vehicle access (i.e., left-turn and right-turn ingress and egress turning

[1] City of Santa Clarita, *Transportation Analysis Updates in Santa Clarita*, May 19, 2020.

movements). A third driveway with access to McBean Parkway is located on the southeast side of the campus. This driveway is stop-controlled and does not provide full access (i.e., left-turn egress movements are prohibited).

Regional access is provided by Interstate 5 (I-5 or Golden State Freeway), which is a north-south freeway that spans the entirety of California. On the western side of Santa Clarita, four mixed-flow freeway lanes are provided in each direction on I-5. In the Project vicinity, northbound and southbound on- and off-ramps are located at Magic Mountain Parkway, Valencia Boulevard, McBean Parkway, and Lyons Avenue.

The City of Santa Clarita General Plan Circulation Element identifies the intersection of McBean Parkway and Orchard Village Road as one of 23 key intersections in the City in need of improvements. The Circulation Element indicates these improvements could include additional turn lanes, installation of traffic signals, synchronization of signals, or other traffic control devices. Beyond McBean Parkway and Orchard Village Road, important roadways in the vicinity of the Project Site include Avenida Navarre, Newhall Avenue, Rockwell Canyon Road, Tournament Road, Valencia Boulevard, Magic Mountain Parkway, Lyons Avenue, and Wiley Canyon Road; all are briefly described below.

McBean Parkway

McBean Parkway is an east-west oriented roadway between I-5 and Orchard Village Road and borders the Project Site to the south and east. North of Avenida Navarre, McBean Parkway curves to become a north-south oriented roadway. McBean Parkway, between I-5 and Copper Hill Drive in the vicinity of the Project Site, is classified as a "Major Highway" in the Circulation Element.[2] South of Town Center Drive, three through travel lanes are provided on McBean Parkway. North of Town Center Drive, four through travel lanes are provided in each direction on McBean Parkway. Separate exclusive left-turn lanes are provided on McBean Parkway at major intersections, and separate exclusive right-turn lanes are provided at the Valencia Boulevard and Magic Mountain Parkway intersections. North of Magic Mountain Parkway, McBean Parkway has a posted speed limit of 50 miles per hour (mph). South of Magic Mountain Parkway, McBean Parkway has a posted speed limit of 45 mph.

Orchard Village Road

Orchard Village Road is a north-south oriented roadway that provides direct access to the Project Site from the south. Orchard Village Road is designated as a Major Highway in the Circulation Element and provides two through travel lanes in each direction. Separate exclusive left-turn and right-turn lanes are provided on Orchard Village Road at major intersections. South of Lyons Avenue, Orchard Village Road becomes Valley Street. Orchard Village Road has a posted speed limit of 45 mph.

Avenida Navarre

Avenida Navarre is a north-south oriented roadway that provides direct access to the Project Site from the east. Avenida Navarre is designated as a Local Street in the Circulation Element and provides one through travel lane in each direction. Separate exclusive left-turn and right-turn lanes

[2] City of Santa Clarita, *General Plan Circulation Element*, Table C-2: Highway Plan Roadways in the Planning Area, 2011.

are provided in each direction on Avenida Navarre at the McBean Parkway intersection. Avenida Navarre has a posted speed limit of 35 mph.

Newhall Avenue

Newhall Avenue is a north-south oriented roadway located southeast of the Project Site. Newhall Avenue is designated as a Secondary Highway in the Circulation Element and provides one through travel lane in each direction. Separate exclusive left-turn and right-turn lanes are provided on Newhall Avenue at the Lyons Avenue intersection. North of Lyons Avenue, Newhall Avenue is posted for a 25 miles per hour speed limit. South of Lyons Avenue, Newhall Avenue has a posted speed limit of 35 mph.

Rockwell Canyon Road

Rockwell Canyon Road is a north-south oriented roadway located west of the Project Site. Within the Project vicinity, Rockwell Canyon Road is designated as a Secondary Highway in the Circulation Element and provides one through travel lane in each direction to the College of the Canyons campus, after which it expands to two travel lanes in each direction. Separate exclusive left-turn lanes are provided on Rockwell Canyon Road at the McBean Parkway intersection. A separate exclusive right-turn lane is provided in the southbound direction on Rockwell Canyon Road at the McBean Parkway intersection. South of McBean Parkway, Rockwell Canyon Road becomes Tournament Road. Rockwell Canyon Road has a posted speed limit of 45 mph.

Tournament Road

Tournament Road is a north-south oriented roadway located west of the Project Site. Within the Project vicinity, Tournament Road is designated as a Limited Secondary Highway in the Circulation Element and provides one through travel lane in each direction. However, two through travel lanes are provided in the northbound direction on Tournament Road for 1,500 feet, approaching the McBean Parkway intersection. A separate exclusive left-turn lane is provided on Tournament Road at the McBean Parkway intersection. Separate exclusive right-turn lanes are provided in the northbound direction on Tournament Road at the McBean Parkway intersection and in the southbound direction at the Wiley Canyon Road intersection. North of McBean Parkway, Tournament Road becomes Rockwell Canyon Road. Tournament Road has a posted speed limit of 35 to 40 mph.

Valencia Boulevard

Valencia Boulevard is an east-west oriented roadway located north of the Project Site. East of Citrus Street, Valencia Boulevard curves to become a north-south oriented roadway. Valencia Boulevard is designated as a Major Highway in the Circulation Element providing a minimum of three through travel lanes in each direction. West of McBean Parkway, four through travel lanes are provided in the westbound direction on Valencia Boulevard. Separate exclusive left-turn lanes are provided in both directions on Valencia Boulevard at major intersections. Separate exclusive right-turn lanes are provided in both directions on Valencia Boulevard at the McBean Parkway intersection and in the southbound direction at the Magic Mountain Parkway intersection. West of McBean Parkway, Valencia Boulevard has a posted speed limit of 50 mph speed limit. East of McBean Parkway, Valencia Boulevard has a posted speed limit of 45 mph.

Magic Mountain Parkway

Magic Mountain Parkway is an east-west oriented roadway located north of the Project Site. Magic Mountain Parkway is designated as a Major Highway in the Circulation Element and provides two to four through travel lanes in each direction. Separate exclusive left-turn lanes are provided on Magic Mountain Parkway at major intersections. Separate exclusive right-turn lanes are provided in both directions on Magic Mountain Parkway at the McBean Parkway intersection. West of McBean Parkway, Magic Mountain Parkway has a posted speed limit of 50 mph. East of McBean Parkway, Magic Mountain Parkway has a posted speed limit of 45 mph.

Lyons Avenue

Lyons Avenue is an east-west oriented roadway located south of the Project Site. Lyons Avenue is designated as a Major Highway in the Circulation Element and provides three through travel lanes in each direction, west of Peachland Avenue. East of Peachland Avenue, Lyons Avenue provides two through travel lanes in each direction. Separate exclusive left-turn lanes are provided on Lyons Avenue at major intersections. Separate exclusive right-turn lanes are provided on Lyons Avenue in both directions at the Orchard Village Road intersection and in the westbound direction at the Newhall Avenue intersection. Lyons Avenue has a posted speed limit of 40 mph.

Wiley Canyon Road

Wiley Canyon Road is an east-west oriented roadway located south of the Project Site. South of Tournament Road, Wiley Canyon Road curves to become a north-south oriented roadway. Wiley Canyon Road is designated as a Major Highway in the Circulation Element between Via Princessa and Lyons Avenue and provides two through travel lanes in each direction in the Project vicinity. Separate exclusive left-turn lanes are provided on Wiley Canyon Road at major intersections. Separate exclusive right-turn lanes are provided on Wiley Canyon Road in the westbound direction at the Orchard Village Road intersection and in both the northbound and southbound directions at the Lyons Avenue intersection. Wiley Canyon Road has a posted speed limit of 45 mph.

EXISTING TRAFFIC CONDITIONS IN THE STUDY AREA

The study area established by LLG for the Project, in consultation with City staff, includes 14 intersections, all but one of which are signalized (West Driveway and McBean Parkway, No. 14, is a stop-controlled intersection). These intersections are as follow:

1. I-5 Southbound Ramps and McBean Parkway
2. I-5 Northbound Ramps and McBean Parkway
3. Rockwell Canyon Road/Tournament Road and McBean Parkway
4. McBean Parkway and Valencia Boulevard
5. McBean Parkway and Magic Mountain Parkway
6. Wiley Canyon Road and Lyons Avenue
7. Tournament Road and Wiley Canyon Road
8. Orchard Village Road and Lyons Avenue

9. Orchard Village Road and Wiley Canyon Road
10. Orchard Village Road and McBean Parkway
11. Newhall Avenue and Lyons Avenue
12. Valencia Boulevard and Magic Mountain Parkway
13. Avenida Navarre and McBean Parkway
14. West Driveway and McBean Parkway (Stop-Controlled Intersection)

EXISTING ROADWAY PERFORMANCE

Level of service (LOS) values are used to describe intersection operations with service levels ranging from LOS A (free flow) to LOS F (jammed condition). The following descriptions summarize Highway Capacity Manual (HCM) criteria for signalized intersections for each level of service:

- **LOS A** describes operations with very low control delay, up to 10 seconds per vehicle. This LOS occurs when progression is extremely favorable and most vehicles arrive during the green phase. Most vehicles do not stop at all. Short cycle lengths may also contribute to low delay values.

- **LOS B** describes operations with control delay greater than 10 and up to 20 seconds per vehicle. This LOS generally occurs with good progression, short cycle lengths, or both. More vehicles stop than with LOS A, causing higher levels of delay.

- **LOS C** describes operations with control delay greater than 20 and up to 35 seconds per vehicle. These higher delays may result from fair progression, longer cycle lengths, or both. Individual cycle failures may begin to appear at this level. The number of vehicles stopping is significant at this level although many still pass through the intersection without stopping.

- **LOS D** describes operations with control delay greater than 35 and up to 55 seconds per vehicle. At LOS D, the influence of congestion becomes more noticeable. Longer delays may result from some combination of unfavorable progression, long cycle lengths, or high volume-to-capacity (V/C) ratios. Many vehicles stop, and the proportion of vehicles not stopping declines. Individual cycle failures are noticeable.

- **LOS E** describes operations with control delay greater than 55 and up to 80 seconds per vehicle. This LOS is considered by many agencies to be the limit of acceptable delay. These high delay values generally indicate poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences.

- **LOS F** describes operations with control delay in excess of 80 seconds per vehicle. This LOS, considered to be unacceptable to most drivers, often occurs with oversaturation (i.e., when arrival flow rates exceed the capacity of the lane groups). It may also occur at high V/C ratios with many individual cycle failures. Poor progression and long cycle lengths may also be major contributing factors to such delay levels.

For stop-controlled intersections, intersection delay ranges for each LOS are 0 to 10 seconds per vehicle for LOS A, 10 to 15 seconds per vehicle for LOS B, 15 to 25 seconds per vehicle for LOS C,

25 to 35 seconds per vehicle for LOS D, 35 to 50 seconds per vehicle for LOS E, and above 50 seconds per vehicle for LOS F.

The existing traffic volumes at the study area intersections during weekday a.m. and p.m. peak hours are presented in **Table 4.6-1**.

As shown in **Table 4.6-1**, 12 of the 14 intersections are presently operating at LOS D or better during the weekday a.m. and/or p.m. peak hours under existing conditions. Intersection No. 4 (McBean Parkway and Valencia Boulevard) at the p.m. peak hour and Intersection No. 10 (Orchard Village Road and McBean Parkway) at the a.m. and p.m. peak hours are operating at LOS E under existing conditions.

Table 4.6-1
Existing Levels of Service of the Intersections in the Study Area

NO.	INTERSECTION	PEAK HOUR	EXISTING CONDITIONS	
			DELAY (sec/veh)	LOS
1	I-5 Southbound Ramps and	a.m.	7.2	A
	McBean Parkway	p.m.	7.4	A
2	I-5 Northbound Ramps and	a.m.	13.3	B
	McBean Parkway	p.m.	11.4	B
3	Tournament Road/Rockwell Canyon Road and	a.m.	37.2	D
	McBean Parkway	p.m.	40.9	D
4	McBean Parkway and	a.m.	51.2	D
	Valencia Boulevard	**p.m.**	**66**	**E**
5	McBean Parkway and	a.m.	39.5	D
	Magic Mountain Parkway	p.m.	41.3	D
6	Wiley Canyon Road and	a.m.	41.8	D
	Lyons Avenue	p.m.	41.5	D
7	Tournament Road and	a.m.	27.2	C
	Wiley Canyon Road	p.m.	27.7	C
8	Orchard Village Road and	a.m.	32.6	C
	Lyons Avenue	p.m.	39	D
9	Orchard Village Road and	a.m.	41.8	D
	Wiley Canyon Road	p.m.	36.2	D
10	**Orchard Village Road and**	**a.m.**	**55.9**	**E**
	McBean Parkway	**p.m.**	**58.1**	**E**
11	Newhall Avenue and	a.m.	31.8	C
	Lyons Avenue	p.m.	27.4	C
12	Valencia Boulevard and	a.m.	35.8	D
	Magic Mountain Parkway	p.m.	53.5	D
13	Avenida Navarre and	a.m.	32.9	C
	McBean Parkway	p.m.	29.5	C
14	West Driveway and	a.m.	17.3	C
	McBean Parkway (stop-controlled)	p.m.	18.4	C

Note: Traffic volume data were collected in April 2017. **Bolded** text indicates intersections operating at LOS E.
Source: LLG, Traffic Impact Study: Henry Mayo Newhall Hospital Amended Specific Plan, May 2019, Table 5-1.

PUBLIC TRANSIT

Local and regional bus service is provided by City of Santa Clarita Transit, which operates local routes within Santa Clarita Valley and commuter service into and out of downtown Los Angeles, Century City, Antelope Valley, and Warner Center. The City also provides express services to San Fernando Valley, West Los Angeles, and downtown Los Angeles. In 2006, City of Santa Clarita Transit had an annual ridership of 3.7 million passengers.[3] City of Santa Clarita Transit provides nine local fixed routes, seven commuter express routes, two station link routes, and supplemental school day service.[4] These routes are detailed in the Traffic Impact Study, provided as **Appendix E** of this Draft SEIR. The HMNH campus is served by Local Bus Routes 5 and 6, which both have stops at the corner of McBean Parkway and Orchard Village Road.[5] These bus routes provide service to Stevenson Ranch, William S. Hart High School, and Newhall Community Center to the south and west of the HMNH campus, as well as to the Santa Clarita Metrolink Station, Bowman High School, the Santa Clarita Aquatic Center, Canyon Country Community Center, and Shadow Pines to the east of the HMNH campus. During the morning peak hour, Routes 5 and 6 provide six eastbound buses and eight westbound buses. During the afternoon peak hour, these routes provide seven eastbound buses and seven westbound buses.

PEDESTRIAN AND BICYCLE FACILITIES

The City of Santa Clarita approved the Non-Motorized Transportation Plan Update in September 2014, which provides a comprehensive overview of the state of walking and bicycling in the City, as well as direction for future investments in pedestrian and bicycle facilities programs. This plan identifies several paseos and trails in the Project vicinity, which connect a number of the City's residential areas. More specifically, a segment of one of the paseos starts from Via Jacara and connects to the south side of McBean Parkway across from MOB-1. This plan also identifies Orchard Village Road as a Class III bike route, which includes a signed, shared roadway but does not contain designated, painted bicycle lanes or separate bicycle infrastructure next to the roadway.[6]

4.6.2. REGULATORY FRAMEWORK

STATE

Senate Bill 743

Senate Bill (SB) 743 added Section 21099 to the Public Resources Code (PRC), which directed the Office of Planning and Research (OPR) to prepare guidelines establishing criteria for determining the significance of transportation impacts that promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. SB 743 and PRC Section 21099 further required that, upon certification of such guidelines, "automobile delay, as described solely by level of service or similar measures of vehicular capacity

3 City of Santa Clarita, *General Plan Circulation Element*, 2011.

4 City of Santa Clarita Transit, *Routes and Schedules*, http://santaclaritatransit.com/routes-schedules/, accessed September 6, 2018.

5 City of Santa Clarita Transit, *Bus Finder Map*, http://santaclaritatransit.com/routes-schedules/bus-finder-map/, accessed September 6, 2018.

6 City of Santa Clarita, *City of Santa Clarita Non-Motorized Transportation Plan*, Figure 1.1: Existing Bicycle Facilities and Trails, 2014.

or traffic congestion shall not be considered a significant impact on the environment" pursuant to CEQA.

OPR fulfilled its SB 743 mandate in December 2018, with the publication of its Technical Advisory and with the addition of Section 15064.3 to the State CEQA Guidelines. The Technical Advisory and CEQA Guidelines Section 15064.3 identify VMT as generally the most appropriate measure of transportation impacts. Subdivision (b) of CEQA Guidelines Section 15064.3 identifies the criteria for analyzing transportation impacts and Subdivision (c) specifies that the provisions of CEQA Guidelines Section 15064.3 become effective statewide on July 1, 2020 (although a lead agency may elect to be governed by the provisions of this section immediately). Based on these changes, in May 2020, the City adopted revised Transportation Analysis Guidelines that define a methodology for VMT analysis and to establish new significant impact thresholds with regard to transportation impacts and CEQA. The City's Guidelines are consistent with OPR's Technical Advisory.

California Complete Streets Act

The California Complete Streets Act of 2008 required cities and counties to incorporate balanced and multimodal transportation networks in circulation elements whenever the circulation element underwent a substantive revision. These transportation networks are required to meet the needs of all users of the networks, whether motorists, passengers on public transportation, bicyclists, or pedestrians, children, persons with disabilities, seniors, commercial interests, or others. These networks should also be suitable for the location of the local government, whether urban, suburban, or rural.

REGIONAL

2020-2045 Regional Transportation Plan/Sustainability Communities Strategy

SCAG is responsible for preparing the Regional Transportation Plan/Sustainability Communities Strategy (RTP/SCS) pursuant to Senate Bill 375. The most recent RTP/SCS was adopted on September 3, 2020.[7] The 2020-2045 RTP/SCS, titled Connect SoCal, is a long-range transportation and land use plan that uses growth forecasts and economic trends over a 20-year period to evaluate the role of transportation in the region covered by SCAG. The 2020-2045 RTP/SCS is forecast to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars by 8 percent below 2005 levels by 2020 and 19 percent by 2035 in accordance with the most recent CARB targets adopted in March 2018.

As part of the State's mandate to reduce per-capita GHG emissions from automobiles and light trucks, the 2020-2045 RTP/SCS presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporate best practices for achieving the State-mandated reductions in GHG emissions at the regional level through reduced per-capita VMT. Such goals include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainable policies, and promoting a green region.

[7] Southern California Association of Governments, *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Connect SoCal*, adopted on September 3, 2020.

LOCAL

City of Santa Clarita General Plan

In June 2011, the City adopted a new General Plan, commonly known as One Valley One Vision (OVOV), which is a joint effort between the City of Santa Clarita, the County of Los Angeles, and the Santa Clarita Valley residents. OVOV provides a vision and guidelines for the future growth of the Valley, including policies related to land use and circulation. Per the OVOV Circulation Element, McBean Parkway is designated as a Major Highway.[8] OVOV includes policies that require coordination between land use and circulation planning in order to reduce vehicle trips. The future circulation network is based on projected development permitted by the Land Use Element. Implementation of OVOV policies will create a smooth-flowing transportation system, the potential for shorter trip lengths, and alternative travel modes that encourages reduction of greenhouse gas emissions. The Circulation Element identifies and promotes a variety of techniques for improving mobility that go beyond planning for construction of new streets and highways. These techniques include development of alternative travel modes and support facilities, increased efficiency and capacity of existing systems through management strategies, and coordination of land use planning with transportation planning by promoting concentrated mixed-use development near transit facilities. Applicable goals in the Circulation Element include:

Multi-Modal Circulation Network

- Goal C 1: An inter-connected network of circulation facilities that integrates all travel modes, provides viable alternatives to automobile use, and conforms with regional plans.
  - Objective C 1.1: Provide multi-modal circulation systems that move people and goods efficiently while protecting environmental resources and quality of life.
    - Policy C 1.1.3: Work with local and regional agencies and employers to promote an integrated, seamless transportation system that meets access needs, including local and regional bus service, dial-a-ride, taxis, rail, van pools, car pools, bus pools, bicycling, walking, and automobiles.
    - Policy C 1.1.10: Provide for flexibility in the transportation system to accommodate new technology as it becomes available, in order to reduce trips by vehicles using fossil fuels where feasible and appropriate.

Vehicle Trip Reduction

- Goal C 3: Reduction of vehicle trips and emissions through effective management of travel demand, transportation systems, and parking.
  - Objective C 3.2 Encourage reduction in airborne emissions from vehicles through use of clean vehicles and transportation system management.
    - Policy C 3.2.3: When available and feasible, provide opportunities and infrastructure to support use of alternative fuel vehicles and travel devices.

[8] Los Angeles County and City of Santa Clarita, *One Valley One Vision Plan*, Chapter 3, Circulation, 2011.

- Policy C 3.2.4: The City/County will encourage new commercial and retail developments to provide prioritized parking for electric vehicles and vehicles using alternative fuels.

4.6.3. CONSIDERATION AND DISCUSSION OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

In accordance with CEQA Guidelines Appendix G, the Project would have a significant environmental impact related to transportation if it would:

Threshold (a): Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;

Threshold (b): Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b);

Threshold (c): Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);

Threshold (d): Result in inadequate emergency access.

As discussed above, while LOS would no longer constitute a CEQA impact, it can still be used to inform decisionmakers on the overall effects of the Project. Accordingly, the significance of the potential impacts of Project-generated traffic at the 14 study intersections were identified using the traffic impact criteria set forth by the City of Santa Clarita. According to City staff, a transportation impact on an intersection shall be deemed significant in accordance with at least one of the following criteria:

- If the Project-related increase in delay worsens an intersection from LOS D or better to LOS E or F.
- If the Project-related increase in delay causes the following increase in delay at an intersection that operated (with the Project) at LOS D or better to LOS E or F.
  - LOS D with the Project: More than 4-second increase in delay.
  - LOS E or F with the Project: More than 2-second increase in delay.

METHODOLOGY

Modeling and Assumptions

As identified above, 13 of the 14 intersections in the study area are controlled by traffic signals. As such, these 13 intersections were evaluated using the HCM 2010 method of analysis for signalized intersections and implemented using the Synchro 10 software based on the City of Santa Clarita traffic study guidelines. Specifically, the HCM 2010 methodology for signalized intersections estimates the average control delay for each of the intersection movements and determines the LOS for each constrained movement. The overall intersection average control delay is subsequently assigned an LOS value to describe intersection operations.

One study intersection is controlled by a stop sign and, therefore, was evaluated using the HCM 2010 methodology outlined in Chapter 20 of the HCM 6 for two-way stop-controlled (TWSC) study intersections and implemented using the Synchro 10 software. The HCM 2010 methodology

estimates the average control delay for each of the intersection movements and determines the LOS for each constrained movement. The LOS under both the HCM 2010 methodology for both signalized and TWSC study intersections vary from LOS A (free flow) to LOS F (congested condition), as described above.

Traffic Generation

As previously noted, the Project consists of the construction of 200,000 square feet of additional building floor area for a new D&T Building (84,300 square feet) and an IP-2 Building (115,700 square feet). The new buildings would accommodate uses (e.g., hospital beds) that are currently provided in the existing Main Hospital. Accordingly, the uses to be accommodated within the proposed D&T Building and IP-2 Building would not generate new vehicle trips to the Project Site. However, the building floor area within the existing Hospital (approximately 138,000 square feet) would be re-occupied with administrative office uses, procedure rooms, imaging and MRI space, physical/occupational/ speech therapy space, and storage space currently not provided at the Hospital. Accordingly, in consultation with City staff, the trip generation forecast for the Project is based on the potential new vehicle trips that may be generated through re-occupancy of the building floor area within the existing Hospital by the administrative office space, procedure rooms, imaging and MRI space, physical/occupational/speech therapy space, and storage space.

Using trip generation rates from the ITE Trip Generation Manual, the Proposed Project is expected to generate 157 net new vehicle trips (126 inbound trips and 31 outbound trips) during the a.m. peak hour.[9] During the p.m. peak hour, the Proposed Project is expected to generate 165 net new vehicle trips (38 inbound trips and 127 outbound trips). Over a 24-hour period, the Proposed Project is forecast to generate a net increase of 1,570 daily trips (approximately 785 inbound trips and 785 outbound trips) during a typical weekday. These data are presented in **Table 4.6-2**.

Table 4.6-2
Project Trip Generation

LAND USE	SIZE (Sq. Ft.)	DAILY TRIP VOLUMES[a]	AM PEAK HOUR VOLUMES			PM PEAK HOUR VOLUMES		
			IN	OUT	TOTAL	IN	OUT	TOTAL
Proposed Project								
Administrative Space[b]	80,000	779	80	13	93	15	77	92
Hospital[c]	51,000	547	31	14	45	16	33	49
Medical Office[d]	7,000	244	15	4	19	7	17	24
	NET INCREASE	**1,570**	**126**	**31**	**157**	**38**	**127**	**165**

Table 4.6-2, Notes:
a Trips are one-way traffic movements, entering or leaving.
b ITE Land Use Code 710 (General Office Space)
c ITE Land Use Code 610 (Hospital)
d ITE Land Use Code 720 (Medical-Dental Office Building)
Source: LLG, Traffic Impact Study: Henry Mayo Newhall Hospital Amended Specific Plan, Table 7-1, May 2019.

[9] Institute of Transportation Engineers, *Trip Generation Manual*, 10th Edition, 2017.

Traffic Distribution and Assignment

Project traffic volumes both entering and exiting the Project Site have been distributed and assigned to the adjacent street system based on the following considerations:

- The Project Site's proximity to major traffic corridors (McBean Parkway, Orchard Village Road, Valencia Boulevard, I-5, etc.);
- Expected localized traffic flow patterns based on adjacent roadway channelization and presence of traffic signals;
- Existing intersection traffic volumes;
- Ingress/egress availability at the Project Site assuming the site access and circulation scheme;
- Nearby population and employment centers, as well as adjacent residential neighborhoods; and
- Input from City of Santa Clarita staff.

The relative impact of the added traffic volumes to be generated by the Proposed Project during the a.m. and p.m. peak hours was evaluated based on analysis of future operating conditions with the Proposed Project at the study intersections. The previously discussed capacity analysis procedures were utilized to evaluate the future delay relationships and service level characteristics at each study intersection.

Conditions Considered for Analysis

Traffic impacts at the study intersections were analyzed for the following conditions:

- Condition (a): Existing (2017) Baseline Condition
- Condition (b): Condition (a) with completion and occupancy of the Project
- Condition (c): Opening Year (2022) Baseline Condition due to ambient traffic growth
- Condition (d): Condition (c) with completion and occupancy of the Project
- Condition (e): Future Year (2035) Baseline Conditions based on volumes derived by the SCVCTM
- Condition (f): Condition (e) with completion and occupancy of the Project
- Condition (g): Condition (f) with implementation of Project traffic mitigation measures, where necessary

For purposes of forecasting future pre-Project traffic volumes at the study intersections, existing traffic volumes were increased at an annual rate of 2.0 percent per year to year 2022 (i.e., the anticipated year of Project buildout). Additionally, the Santa Clarita Valley Consolidated Traffic Model (SCVCTM) was utilized for forecasting traffic volumes for year 2035. The ambient growth

factor was based on general traffic growth factors provided in the 2010 Congestion Management Program for Los Angeles County (CMP manual) and determined in consultation with City of Santa Clarita. It is noted that based on review of the general traffic growth factors provided in the CMP manual for the Project study area (i.e., Regional Statistical Area (RSA) 8, Santa Clarita), existing traffic volumes are expected to increase at an annual rate of 1.4 percent per year between years 2015 and 2025. Thus, application of an annual growth factor of the 2.0 percent annual growth rate provides a conservative, worst-case forecast of future traffic volumes, as it substantially exceeds the annual traffic growth rate published in the CMP manual. Further, it is noted that the CMP manual's traffic growth rate is intended to anticipate future traffic generated by development projects in the Project vicinity. Thus, the inclusion of an ambient growth traffic factor, which exceeds the CMP traffic model growth rate, results in a conservative estimate of future traffic volumes at the study intersections.

VMT Analysis

Pursuant to the updated CEQA Guidelines Section 15064.3, and in compliance with changes associated with SB 743, the discussion of impacts below provides a VMT analysis for the Proposed Project.

While a metric used by the City of Santa Clarita to evaluate transportation impacts is LOS, in June 2020, the City adopted transportation impact thresholds and VMT guidance on conducting transportation studies in the City to adhere to CEQA requirements set forth in SB 743.[10] The City's Transportation Analysis Guidelines are consistent with OPR's Technical Advisory, which includes recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures.[11] Note that the City's Transportation Analysis Guidelines and OPR's Technical Advisory recommend significance thresholds for uses, such as residential, office, retail development, and mixed-use development projects. However, it does not address other project types, such as a hospital. However, the City's Transportation Analysis Guidelines state that lead agencies may screen out VMT impacts using project-specific characteristics, such as project location, project size, transit availability, and provision of affordable housing. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a sustainable communities strategy or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact. The City's Transportation Analysis Guidelines further state that "projects located within Transit Priority Areas (TPAs) may also be exempt from VMT analysis." TPAs are defined in OPR's Technical Advisory as a 0.5-mile radius around an existing or planned major transit stop or an existing stop along a high-quality transit corridor (HQTC).A HQTC is defined in OPR's Technical Advisory as a corridor with fixed-route bus service with service intervals no longer than 15 minutes during peak commute hours. A "major transit stop" is defined as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.[12] In addition to projects that generate 110 or fewer daily trips or projects that are located within one-half mile of a HQTC, other categories of

[10] City of Santa Clarita, *Transportation Analysis Updates in Santa Clarita*, May 19, 2020.

[11] California Governor's Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018.

[12] Public Resources Code Section 21064.3.

projects that can be screened from VMT analysis include locally serving retail projects (i.e., projects that are 50,000 square feet or less), a project that provides affordable housing, and projects that are located in low VMT areas (i.e., residential or office projects located in areas that are 15 percent below the City's baseline VMT).

For projects that are located within TPAs, the City's Transportation Analysis Guidelines also provide situations in which a presumption of a less-than-significant impact regarding VMT may not be appropriate, including when a project has a Floor Area Ratio (FAR) of 0.75 or less, when a project includes more parking than required by the City, when a project is inconsistent with the SCAG RTP/SCS, and when a project replaces affordable residential units with a small number of moderate- or high-income residential units. As the Project Site is located within a TPA, as further discussed below, the analysis in the following section will focus on these situations and whether the Project is eligible to be screened from VMT analysis based on the City's Transportation Analysis Guidelines.

PROJECT IMPACTS

Threshold (a): Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

As noted above, while LOS would no longer constitute a CEQA impact, it can still be used to inform decisionmakers on the overall effects of the Project. The subsections below consider the following conditions to evaluate the Project's effect on LOS: the Existing (2017) without and with Project Conditions, the Opening Year (2022) without and with Project Conditions, and Future Year (2035) without and with Project Conditions. The subsections below also provide a qualitative analysis of the Project's consistency with plans addressing the transit, roadway, bicycle, and pedestrian systems.

Vehicular Circulation System Analysis

Existing Conditions

As indicated in **Table 4.6-3**, 12 of the 14 intersections in the study area are operating at LOS D or better during the weekday a.m. and p.m. peak hours under Existing Baseline Conditions. As shown, the following two intersections are expected to operate at LOS E during one or both peak hours under Existing Baseline Conditions: Intersection No. 4 (McBean Parkway and Valencia Boulevard during the p.m. peak hour) and Intersection No. 10 (Orchard Village Road and McBean Parkway during both peak hours).

Traffic impacts from Existing with Project Conditions are also presented in **Table 4.6-3**. As shown, 13 of the 14 intersections in the study area would operate at LOS D or better during the weekday a.m. and p.m. peak hours under Existing with Project Conditions. The only intersection that is expected to continue to operate at LOS E is Intersection No. 4 (McBean Parkway and Valencia Boulevard) during the p.m. peak hour. Upon application of the City's threshold criteria to Existing with Project Conditions, the intersection impact analysis indicates that the Proposed Project is not expected to result in significant impacts at any of the 14 study intersections.

Table 4.6-3
Existing (2017) without and with Project Conditions
Intersection Impact Analysis

NO.	INTERSECTION	PEAK HOUR	WITHOUT PROJECT		WITH PROJECT		CHANGE IN DELAY	SIGNIFICANT IMPACT?
			DELAY (Sec/Veh)	LOS	DELAY (Sec/Veh)	LOS		
1	I-5 Southbound Ramps/ McBean Parkway	AM	7.2	A	7.3	A	0.1	NO
		PM	7.4	A	7.4	A	0	NO
2	I-5 Northbound Ramps/ McBean Parkway	AM	13.3	B	13.5	B	0.2	NO
		PM	11.4	B	11.4	B	0	NO
3	Rockwell Canyon Road-Tournament Road/ McBean Parkway	AM	37.2	D	37.1	D	-0.1	NO
		PM	40.9	D	41.2	D	0.3	NO
4	McBean Parkway/ Valencia Boulevard	AM	51.2	D	51.2	D	0	NO
		PM	66	E	66.1	E	0.1	NO
5	McBean Parkway/ Magic Mountain Parkway	AM	39.5	D	39.5	D	0	NO
		PM	41.3	D	41.2	D	-0.1	NO
6	Wiley Canyon Road/ Lyons Avenue	AM	41.8	D	41.8	D	0	NO
		PM	41.5	D	41.5	D	0	NO
7	Tournament Road/ Wiley Canyon Road	AM	27.2	C	27.4	C	0.2	NO
		PM	27.7	C	27.8	C	0.1	NO
8	Orchard Village Road/ Lyons Avenue	AM	32.6	C	32.6	C	0	NO
		PM	39	D	39.1	D	0.1	NO
9	Orchard Village Road/ Wiley Canyon Road	AM	41.8	D	41.8	D	0	NO
		PM	36.2	D	36.7	D	0.5	NO
10	Orchard Village Road/ McBean Parkway	AM	55.9	E	54.9	D	-1	NO
		PM	58.1	E	54.8	D	-3.3	NO
11	Newhall Avenue/ Lyons Avenue	AM	31.8	C	32	C	0.2	NO
		PM	27.4	C	27.3	C	-0.1	NO
12	Valencia Boulevard/ Magic Mountain Parkway	AM	35.8	D	35.8	D	0	NO
		PM	53.5	D	53.5	D	0	NO
13	Avenida Navarre/ McBean Parkway	AM	32.9	C	32.8	C	-0.1	NO
		PM	29.5	C	29.9	C	0.4	NO
14	West Driveway/McBean Parkway (Unsignalized)	AM	17.3	C	17.7	C	0.4	NO
		PM	18.4	C	19.2	C	0.8	NO

Source: LLG, Traffic Impact Study: Henry Mayo Newhall Hospital Amended Specific Plan, May 2019, Table 5-1.

Opening Year (2022) Conditions

As discussed above, Opening Year Baseline Condition was forecast by applying the 2.0 percent annual ambient growth factor to the existing traffic counts through year 2022 (i.e., the anticipated year of Project buildout). The delay values at the study intersections are incrementally increased with the addition of traffic generated by ambient growth. As shown in **Table 4.6-4**, incremental changes in control delays are noted at all study intersections due to ambient growth. Eleven of the 14 study area intersections are expected to operate at LOS D or better during the weekday a.m. and p.m. peak hours with the addition of growth in ambient traffic under Opening Year Baseline Condition. As shown in **Table 4.6-4**, the following intersections are expected to operate at LOS E during one or both peak hours under Opening Year (2022) Baseline Conditions: Intersection No. 4 (McBean Parkway and Valencia Boulevard during both peak hours),

Intersection No. 10 (Orchard Village Road and McBean Parkway during the a.m. peak hour), and Intersection No. 12 (Valencia Boulevard and Magic Mountain Parkway during the p.m. peak hour).

Opening Year with Project Conditions was forecast based on the addition of traffic generated by the Project to the forecast pre-Project volumes derived through application of the 2 percent traffic growth factor. As shown in **Table 4.6-4**, 12 of the 14 intersections in the study area would operate at LOS D or better during the weekday a.m. and p.m. peak hours under Opening Year with Project Conditions. The following two intersections are expected to continue to operate at LOS E during one or both peak hours under Opening Year with Project Conditions: Intersection No. 4 (McBean Parkway and Valencia Boulevard during both peak hours) and Intersection No. 12 (Valencia Boulevard and Magic Mountain Parkway during the p.m. peak hour). Upon application of the City's threshold criteria to Opening Year with Project Conditions, the intersection impact analysis indicates that the Proposed Project is expected to create incremental, but not significant, impacts at the 14 study intersections.

Consistency with Plans Addressing Transit, Roadway, Bicycle, and Pedestrian Facilities

In regard to mass transit, the Project would not conflict with existing or future transit services since circulation through surrounding streets, such as McBean Parkway and Orchard Village Road, would not be impacted by Project-related improvements on the HMNH campus. Access and circulation in and around the adjacent neighborhoods would also be maintained. The City of Santa Clarita Transit Development Plan provides a plan for short-term operations of the transit program in the City.[13] In the City's Transit Development Plan, Routes 5 and 6 are shown to utilize McBean Parkway with a westbound and eastbound stop near the intersection of McBean Parkway and Orchard Village Road. Service would not be interrupted by the Project since access along McBean Parkway and Orchard Village Road would be maintained. In addition, the Traffic Impact Study prepared for the Proposed Project estimated that the Project would result in 8 transit trips during the a.m. peak hour, 8 transit trips during the p.m. peak hour, and a total of 77 transit trips daily. As discussed in Subsection 4.6.1 (Public Transit) above, bus transit lines are provided near the Project Site. During the morning peak hour, Routes 5 and 6 provide six eastbound buses and eight westbound buses. During the afternoon peak hour, these routes provide seven eastbound buses and seven westbound buses. Given these low numbers, it is anticipated that the existing transit service in the Project area would adequately accommodate the increase in Project-generated transit trips. Therefore, no Project impacts on existing or future transit services in the Project area are expected to occur as a result of the Proposed Project.

In addition, OPR's Technical Advisory advises lead agencies to consider project impacts to transit systems and bicycle and pedestrian networks. Providing alternative modes of transportation that have high accessibility and connectivity reduces VMT, single-occupancy vehicles, and VMT per capita. As described above, the Project Site is located along a high-quality route. The Project would not block access to bus stops or bus routes; rather, the Project's proximity to a high-quality bus route with high frequency of service would promote the usage of bus services for visitors and employees. An existing paseo is located along the south side of McBean Parkway starting from Via Jacara across from MOB-1, and Orchard Village Road is classified as a Class III bike route. The Project would not conflict with the operation of either of these facilities. Since the Project would not block access to bus transit services, bicycle facilities, or sidewalks, the Project would not

[13] City of Santa Clarita, *Transit Development Plan*, May 2019.

conflict with a plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and impacts would be less than significant.

Table 4.6-4
Opening Year (2022) without and with Project Conditions
Intersection Impact Analysis

NO.	INTERSECTION	PEAK HOUR	WITHOUT PROJECT		WITH PROJECT		CHANGE IN DELAY	SIGNIFICANT IMPACT?
			DELAY (Sec/Veh)	LOS	DELAY (Sec/Veh)	LOS		
1	I-5 Southbound Ramps/ McBean Parkway	AM	7.4	A	7.6	A	0.2	NO
		PM	7.7	A	7.8	A	0.1	NO
2	I-5 Northbound Ramps/ McBean Parkway	AM	14.2	B	14.4	B	0.2	NO
		PM	12.2	B	12.3	B	0.1	NO
3	Rockwell Canyon Road-Tournament Road/ McBean Parkway	AM	38.5	D	38.4	D	-0.1	NO
		PM	43.6	D	44.1	D	0.5	NO
4	McBean Parkway/ Valencia Boulevard	AM	55.6	E	55.6	E	0	NO
		PM	70.2	E	70.3	E	0.1	NO
5	McBean Parkway/ Magic Mountain Parkway	AM	40.8	D	40.8	D	0	NO
		PM	46	D	46	D	0	NO
6	Wiley Canyon Road/ Lyons Avenue	AM	42.6	D	42.6	D	0	NO
		PM	43.8	D	43.9	D	0.1	NO
7	Tournament Road/ Wiley Canyon Road	AM	28.6	C	28.8	C	0.2	NO
		PM	29	C	29	C	0	NO
8	Orchard Village Road/ Lyons Avenue	AM	33.6	C	33.6	C	0	NO
		PM	40.5	D	40.6	D	0.1	NO
9	Orchard Village Road/ Wiley Canyon Road	AM	44.8	D	44.8	D	0	NO
		PM	37.4	D	38.4	D	1	NO
10	Orchard Village Road/ McBean Parkway	AM	57.2	E	54.4	D	-2.8	NO
		PM	51.3	D	49.8	D	-1.5	NO
11	Newhall Avenue/ Lyons Avenue	AM	33	C	33.1	C	0.1	NO
		PM	28.8	C	28.7	C	-0.1	NO
12	Valencia Boulevard/ Magic Mountain Parkway	AM	36.9	D	36.9	D	0	NO
		PM	68.5	E	68.9	E	0.4	NO
13	Avenida Navarre/ McBean Parkway	AM	32.9	C	32.8	C	-0.1	NO
		PM	29.2	C	29.7	C	0.5	NO
14	West Driveway/McBean Parkway (Unsignalized)	AM	20.6	C	21.1	C	0.5	NO
		PM	21	C	22.3	C	1.3	NO

Source: LLG, Traffic Impact Study: Henry Mayo Newhall Hospital Amended Specific Plan, May 2019, Table 5-1.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

The 2008 Master Plan EIR determined that four intersections would be significantly impacted by the proposed hospital and medical office uses under an Interim Year scenario (approximately 2019): McBean Parkway at Magic Mountain Parkway, Orchard Village Road at Wiley Canyon Road, Orchard Village Road at McBean Parkway, and Valencia Boulevard at Magic Mountain Parkway. The Master Plan EIR identified five mitigation measures, which would minimize impacts at these four intersections to less-than-significant levels. These mitigation measures include intersection improvements (i.e., restriping, updated signal phasing, adding additional through-

lanes or turn lanes) at each of the above intersections, as well as a required fee payment to the Valencia Bridge and Thoroughfare District, for fair-share contributions for future traffic system improvements. The 2008 Master Plan EIR did not identify any significant impacts related to mass transit or nonmotorized travel systems as a result of the HMNH campus Master Plan's implementation. Therefore, the Proposed Project would not result in any additional impacts beyond those identified in the 2008 Master Plan EIR.

Mitigation Measures

The Proposed Project would not result in significant impacts, as described above. Therefore, there are no additional mitigation measures required for the Proposed Project under Opening Year Conditions beyond those included in the 2008 Master Plan EIR.

Level of Significance After Mitigation

Impacts related to applicable plans, ordinances, or policies establishing measures of effectiveness for the performance of the circulation system would be less than significant without mitigation.

Threshold (b): Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b).

The following summarizes the Henry Mayo Newhall Hospital Amended Specific Plan Project VMT Analysis, prepared by Stantec in 2020, and included as **Appendix F** of this Draft SEIR. The following impacts discussion analyzes whether the Proposed Project would conflict or be inconsistent with CEQA Guidelines Section 15064.3(b).

As stated above, the City's Transportation Analysis Guidelines state that "projects located within Transit Priority Areas (TPAs) may also be exempt from VMT analysis." TPAs are defined in OPR's Technical Advisory as a 0.5-mile radius around an existing or planned major transit stop or an existing stop along an HQTC. The Project is generally located north of the McBean Parkway and Orchard Village Road intersection and is located within one of the City's defined Transit Screening Areas.[14] The City of Santa Clarita operates bus service provided by Santa Clarita Transit (SCT), with routes that provide local service, commuter express service, and station links service. Two bus routes, Routes 799 and 797, provide service frequencies of 15 minutes or less and have bus stops less than a 0.5-mile walking distance from the Project Site. As such, Routes 799 and 797 bus stops adjacent to the Project Site on McBean Parkway and Orchard Village Road are considered existing bus stops along an HQTC. Therefore, because the Project Site is less than 0.5 mile from Routes 797 and 799 bus stops near the intersection of McBean Parkway and Orchard Village Road, the Project Site is located within a Transit Priority Area, as shown in Figure 7 of the City's Transportation Analysis Guidelines, and can be screened from VMT analysis.

As stated above, the City's Transportation Analysis Guidelines also provide situations in which a presumption of a less-than-significant impact may not be appropriate, including when a project has a Floor Area Ratio (FAR) of 0.75 or less, when a project includes more parking than required by the City, when a project is inconsistent with the SCAG RTP/SCS, and when a project replaces affordable residential units with a small number of moderate- or high-income residential units. These situations are analyzed in the paragraphs below.

[14] City of Santa Clarita, *Transportation Analysis Updates in Santa Clarita*, May 19, 2020.

Floor Area Ratio

The Project has a floor area ratio greater than 0.75 FAR, and the Project would be increasing the overall FAR for the entire HMNH Specific Plan area.

Parking Supply

A Parking Demand Study was prepared for the Project where the existing parking supply, parking code requirement, and parking utilization was evaluated, along with parking management solutions.[15] The Parking Demand Study was reviewed and approved by City staff. Therefore, the Project provides parking as required by the City and does not provide an excess of parking.

SCAG's RTP/SCS

The Project is consistent with SCAG's 2020-2045 RTP/SCS, which as stated above, is a document that evaluates the regional land use patterns and transportation systems to achieve the State's target GHG emissions reduction goals. In November 2017, SCAG engaged all 197 local jurisdictions (including City of Santa Clarita) and 15 subregions in a Bottom-Up Local Input and Envisioning Process in order to solicit information, such as the most current land use, socio-economic demographics, and sustainability practices. The information that is collected from this effort is summarized in a Data/Map Book for each jurisdiction and was utilized for the development of Connect SoCal, the 2020-2045 Regional RTP/SCS.[16] The Data/Map Book illustrates that the Project Site is intended for Public/Institutional use similar to existing conditions. The new structures proposed as part of the Project would not increase the approved bed count for the HMNH. In addition, existing uses would be relocated to the new buildings and would be replaced by uses that support the HMNH facility. Therefore, since the Project is consistent with the intended land use shown in SCAG's Data/Map Book, the Project is consistent with the RTP/SCS.

Affordable Housing

The Project would not replace any affordable housing units as there are no such units located within the HMNH campus.

Diversity of Land Uses

In addition to the criteria described above, a project's land use can greatly impact the VMT generated by a project. Specifically, interactions between different land uses and interactions between land use and transportation have the potential to reduce VMT. The Project is consistent with the diversity of existing land uses. The immediate area around the Project site consists of a mix of residential, retail, office, hospital, and school uses. The greater area surrounding the Project Site consists of residential subdivisions, parks, schools, and commercial retail centers. A resident of the immediate area is able to easily and conveniently walk to a variety of destinations, such as the hospital, medical offices, food establishments, grocery stores, a bank, etc. Since the Project complements the diversity of existing land uses, the Project would have a less-than-significant impact on VMT when considering the land use patterns.

[15] *Parking Demand Study Henry Mayo Newhall Hospital*, February 2020.

[16] Southern California Association of Governments, *Connect SoCal: The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Local Input and Envisioning Process Data/Map Book for the City of Santa Clarita*, November 2019.

In summary, the accessibility to high-quality transit stops near the intersection of McBean Parkway and Orchard Village Road would promote an alternative mode of travel to the HMNH campus, thereby reducing vehicle trips and VMT. Therefore, because the Project Site is located within 0.5 mile of an existing stop along an HQTC, and because none of the above-mentioned situations precluding a less-than-significant finding apply to the Project, the Project is screened from VMT analysis given its proximity and location as described above. Therefore, the City can presume that the Project would have a less-than-significant impact on VMT, per CEQA Guidelines Section 15064.3(b)(1).

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

Not applicable. A VMT analysis was not required at the time of the 2008 Master Plan EIR preparation.

Mitigation Measures

As the Proposed Project would result in less-than-significant impacts related to reducing VMT, no mitigation measures are required.

Level of Significance After Mitigation

Impacts related to VMT would be less than significant without mitigation.

Threshold (c): Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

The Proposed Project would not introduce design features, such as sharp curves or dangerous intersections. While the Project Site would move the main hospital drop-off from the current location in front of the existing Main Hospital Building to the front of the proposed IP-2 Building, these internal roadways would be constructed in accordance with the City's design standards. Furthermore, the Project would construct buildings to house hospital and diagnostic and treatment uses, which would be consistent with existing uses on the HMNH campus. As such, the Project would not construct any incompatible uses that are inconsistent with the surrounding area. Therefore, the Project would not substantially increase hazards due to the Project's geometric design features, and impacts related to traffic hazards would be less than significant.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

The 2008 Master Plan EIR analyzed Project impacts related to site access and found that the increase in traffic volume associated with expansion of the hospital and medical office facilities would result in significant circulation impacts. These significant impacts were reduced to less-than-significant levels with the implementation of a mitigation measure requiring intersection improvements at the McBean Parkway and Orchard Village Road intersection. Specifically, this mitigation measure required the widening of the southbound approach to allow for a left-turn lane and a second through lane in the hospital driveway and adding a separate westbound right-turn lane on McBean Parkway. The Master Plan EIR also found that the HMNH campus's internal street network would continue to provide efficient circulation for employees and visitors during peak hours with buildout of the Master Plan. With the above-mentioned intersection improvements, the 2008 Master Plan EIR found that site access and circulation impacts associated with implementing the HMNH campus Master Plan would be reduced to a less-than-significant

level. The Proposed Project would not result in any additional impacts beyond those identified in the 2008 Master Plan EIR.

Mitigation Measures

Impacts related to traffic hazards would be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts related to traffic hazards would be less than significant without mitigation.

Threshold (d): Result in inadequate emergency access.

The Proposed Project's ingress, egress, and circulation are required to meet Los Angeles County Fire Department's standards, ensuring new developments provide adequate access for emergency vehicles. The Project Site and the surrounding roadways and internal driveways do not pose any unique conditions that would limit the ability for emergency responders to access the Project Site. Further, final Project Plans are subject to review and approval by the Los Angeles County Fire Department to ensure compliance with established regulations and policies.

Construction activities associated with buildout of the Project could potentially result in partial lane closures or temporary closure of street segments along McBean Parkway, especially during construction of the aboveground parking levels at PS-4. As a result, the Project is required to prepare a construction traffic management plan for any proposed street closures to be approved by the City.

With compliance with required regulations related to emergency access and circulation and approval of a construction traffic management plan, the Project would not result in significant impacts due to inadequate emergency access.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

As mentioned above, with the above-mentioned intersection improvements at the McBean Parkway and Orchard Village Road intersection and main entrance to the HMNH campus, the 2008 Master Plan EIR found that site access and circulation impacts associated with implementing the HMNH Master Plan would be less than significant. The Proposed Project would not result in any additional impacts regarding emergency access beyond those identified in the 2008 Master Plan EIR.

Mitigation Measures

Impacts related to emergency access would be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts related to emergency access would be less than significant without mitigation.

4.6.4. CUMULATIVE IMPACTS

As discussed above, the Future Year (2035) Baseline Condition was forecast by utilizing the SCVCTM. As shown in **Table 4.6-5**, five of the 14 study area intersections are expected to operate

at LOS D or better during the weekday a.m. and p.m. peak hours with the addition of growth in ambient traffic under the Future Year (2035) Baseline Conditions. As shown in **Table 4.6-5**, the following nine intersections are expected to operate at LOS E or worse during one or both peak hours under Future Year (2035) Baseline Conditions:

- Intersection No. 3 (Rockwell Canyon Road/Tournament Road and McBean Parkway during the p.m. peak hour)
- Intersection No. 4 (McBean Parkway and Valencia Boulevard during the p.m. peak hour)
- Intersection No. 5 (McBean Parkway and Magic Mountain Parkway during both peak hours)
- Intersection No. 6 (Wiley Canyon Road and Lyons Avenue during the p.m. peak hour)
- Intersection No. 8 (Orchard Village Road and Lyons Avenue during the p.m. peak hour)
- Intersection No. 9 (Orchard Village Road and Wiley Canyon Road during both peak hours)
- Intersection No. 10 (Orchard Village Road and McBean Parkway during both peak hours)
- Intersection No. 11 (Newhall Avenue and Lyons Avenue during the p.m. peak hour)
- Intersection No. 12 (Valencia Boulevard and Magic Mountain Parkway during both peak hours)

Future Year with Project Condition (i.e., cumulative impacts) was forecast based on the addition of traffic generated by the Project to the forecast pre-Project volumes derived through the SCVCTM. As shown in **Table 4.6-5**, the same five of the 14 study area intersections are expected to operate at LOS D or better during the weekday a.m. and p.m. peak hours under the Future Year with Project Condition. Also as shown, the same nine intersections are expected to operate at LOS E or worse during one or both peak hours under Future Year with Project Condition.

Table 4.6-5
Future Year (2035) without and with Project Conditions
Intersection Impact Analysis

NO.	INTERSECTION	PEAK HOUR	WITHOUT PROJECT		WITH PROJECT		CHANGE IN DELAY	SIGNIFICANT IMPACT?
			DELAY (Sec/Veh)	LOS	DELAY (Sec/Veh)	LOS		
1	I-5 Southbound Ramps/ McBean Parkway	AM	34.9	C	37.0	D	2.1	NO
		PM	47.4	D	48.4	D	1.0	NO
2	I-5 Northbound Ramps/ McBean Parkway	AM	11.9	B	12.3	B	0.4	NO
		PM	12.7	B	13.1	B	0.4	NO
3	Rockwell Canyon Road-Tournament Road/ McBean Parkway	AM	41.2	D	41.3	D	0.1	NO
		PM	100.7	F	102.7	F	2.0	NO
4	McBean Parkway/ Valencia Boulevard	AM	52.4	D	52.8	D	0.4	NO
		PM	196.0	F	196.1	F	0.1	NO
5	McBean Parkway/ Magic Mountain Parkway	AM	69.9	E	70.3	E	0.4	NO
		PM	116.0	F	116.5	F	0.5	NO
6	Wiley Canyon Road/ Lyons Avenue	AM	54.4	D	54.4	D	0.0	NO
		PM	71.9	E	72.0	E	0.1	NO
7	Tournament Road/ Wiley Canyon Road	AM	19.3	B	19.4	B	0.1	NO
		PM	29.0	C	29.1	C	0.1	NO
8	Orchard Village Road/ Lyons Avenue	AM	30.1	C	30.1	C	0.0	NO
		PM	92.7	F	94.4	F	1.7	NO
9	Orchard Village Road/ Wiley Canyon Road	AM	159.1	F	163.3	F	4.2	YES
		PM	183.5	F	190.6	F	7.1	YES
10	Orchard Village Road/ McBean Parkway	AM	67.1	E	86.0	E	18.9	YES
		PM	253.6	F	263.3	F	9.7	YES
11	Newhall Avenue/ Lyons Avenue	AM	33.1	C	33.7	C	0.6	NO
		PM	94.3	F	94.2	F	-0.1	NO
12	Valencia Boulevard/ Magic Mountain Parkway	AM	122.9	F	122.9	F	0.0	NO
		PM	215.2	F	215.9	F	0.7	NO
13	Avenida Navarre/ McBean Parkway	AM	30.7	C	30.7	C	0.0	NO
		PM	29.7	C	30.3	C	0.6	NO
14	West Driveway/McBean Parkway (Unsignalized)	AM	20.4	C	20.6	C	0.2	NO
		PM	28.8	D	30.2	D	1.4	NO

Source: LLG, Traffic Impact Study: Henry Mayo Newhall Hospital Amended Specific Plan, May 2019, Table 5-1.

Upon application of the City's threshold criteria to the Future Year with Project Conditions, the intersection impact analysis indicates that the Proposed Project is expected to create a significant impact at two of the 14 study intersections during both peak hours, specifically Intersection No. 9 (Orchard Village Road and Wiley Canyon Road) and Intersection No. 10 (Orchard Village Road and McBean Parkway). Accordingly, mitigation measures are proposed to reduce impacts at these two intersections (see below).

The traffic mitigation measures below were developed to mitigate the potentially significant Project-related transportation impacts identified in the Future (2035) Condition to less-than-significant levels. It should be noted that the previous Development Agreement associated with the approved Master Plan required the construction of various traffic mitigation measures, several of which have already been constructed in accordance with the Development Agreement, to

mitigate impacts associated with the implementation of the Master Plan. These mitigation measures would be in addition to and/or supersede the traffic improvement provisions included in the previous Development Agreement.

S-TR1 Orchard Village Road/Wiley Canyon Road: The existing traffic signal phasing shall be modified to include a right-turn overlap phase to the westbound approach of Wiley Canyon Road. The right-turn phase proposed for Wiley Canyon Road shall overlap with the existing left-turn phase provided for the southbound Orchard Village Road approach. No physical improvements to the existing lane configurations are required.

S-TR2 Orchard Village Road/McBean Parkway: The southbound Orchard Village Road approach to the McBean Parkway intersection shall be reconfigured to be consistent with the lane configuration in the City approved design plans for this intersection.

As shown in **Table 4.6-6**, these mitigation measures are anticipated to reduce the Project's cumulative impacts to less-than-significant levels when compared to Future 2035 without Project Conditions at Intersection No. 9 (Orchard Village Road and Wiley Canyon Road) and Intersection No. 10 (Orchard Village Road and McBean Parkway). Therefore, the Project's contribution after implementation of mitigation measures would not be cumulatively considerable, and cumulative impacts would be less than significant.

Table 4.6-6
Future Year (2035) with Mitigated Project Conditions
Intersection Impact Analysis

NO.	INTERSECTION	PEAK HOUR	WITH PROJECT		WITH PROJECT MITIGATION		CHANGE IN DELAY	MITIGATED?
			DELAY (Sec/Veh)	LOS	DELAY (Sec/Veh)	LOS		
1	I-5 Southbound Ramps/ McBean Parkway	AM	37.0	D	37.0	D	2.1	N/A
		PM	48.4	D	48.4	D	1.0	N/A
2	I-5 Northbound Ramps/ McBean Parkway	AM	12.3	B	12.3	B	0.4	N/A
		PM	13.1	B	13.1	B	0.4	N/A
3	Rockwell Canyon Road-Tournament Road/ McBean Parkway	AM	41.3	D	41.3	D	0.1	N/A
		PM	102.7	F	102.7	F	2.0	N/A
4	McBean Parkway/ Valencia Boulevard	AM	52.8	D	52.8	D	0.4	N/A
		PM	196.1	F	196.1	F	0.1	N/A
5	McBean Parkway/ Magic Mountain Parkway	AM	70.3	E	70.3	E	0.4	N/A
		PM	116.5	F	116.5	F	0.5	N/A
6	Wiley Canyon Road/ Lyons Avenue	AM	54.4	D	54.4	D	0.0	N/A
		PM	72.0	E	72.0	E	0.1	N/A
7	Tournament Road/ Wiley Canyon Road	AM	19.4	B	19.4	B	0.1	N/A
		PM	29.1	C	29.1	C	0.1	N/A
8	Orchard Village Road/ Lyons Avenue	AM	30.1	C	30.1	C	0.0	N/A
		PM	94.4	F	94.4	F	1.7	N/A
9	Orchard Village Road/ Wiley Canyon Road	AM	163.3	F	129.5	F	-29.6	YES
		PM	190.6	F	172.2	F	-11.3	YES
10	Orchard Village Road/ McBean Parkway	AM	86.0	E	48.5	D	-18.6	YES
		PM	263.3	F	206.5	F	-47.1	YES
11	Newhall Avenue/ Lyons Avenue	AM	33.7	C	33.7	C	0.6	N/A
		PM	94.2	F	94.2	F	-0.1	N/A
12	Valencia Boulevard/ Magic Mountain Parkway	AM	122.9	F	122.9	F	0.0	N/A
		PM	215.9	F	215.9	F	0.7	N/A
13	Avenida Navarre/ McBean Parkway	AM	30.7	C	30.7	C	0.0	N/A
		PM	30.3	C	30.3	C	0.6	N/A
14	West Driveway/McBean Parkway (Unsignalized)	AM	20.6	C	20.6	C	0.2	N/A
		PM	30.2	D	30.2	D	1.4	N/A

Source: LLG, Traffic Impact Study: Henry Mayo Newhall Hospital Amended Specific Plan, May 2019, Table 5-1.

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This section of the Draft SEIR analyzes the potential impacts to tribal cultural resources caused by the construction and operation of the Proposed Project. Further, this section summarizes the results of the required notification and consultation with Native American tribes who expressed interest in Project consultation with the City.

4.7.1. ENVIRONMENTAL SETTING

According to the Conservation and Open Space Element of the Santa Clarita General Plan, the earliest physical evidence of human occupation in the Upper Santa Clara River area dates from 7,000 to 4,000 years ago, and was recovered from two sites near Vasquez Rocks.[1] The identities of these early settlers are unknown. The Tataviam peoples began to reach the Santa Clarita area in A.D. 450, where they lived primarily in the upper reaches of the Santa Clara River, extending from the Antelope Valley to the San Gabriel Mountains.[2] The Native American Heritage Commission (NAHC) identified three sites of Native American cultural significance near the Santa Clara River: CA-LAN-361 (Vasquez Rocks), CA-LAN-366, and CA-LAN-367. The Fernandeño Tataviam Band of Mission Indians created a map in 2015 that shows the historic tribal territories in the vicinity of modern-day Santa Clarita, which shows the tribal areas of Piinga and Chaguayanga to the north of Santa Clarita, Tochonanga and Juunga to the west, Tobimonga to the east, and Passenga and Achoicominga to the south.[3] Other sites of cultural significance include Bowers Cave, near Val Verde, which contained many Native American cultural and religious artifacts, and is located at the crest of the mountain near the entrance to the Chiquita Canyon landfill.[4]

Notification of the Proposed Project, pursuant to Assembly Bill (AB) 52 and Section 21080.3.1 of the California Public Resources Code (PRC), was provided to Tribal President Rudy Ortega Jr. of the Fernandeño Tataviam Band of Mission Indians. Mr. Jairo Avila, the Fernandeño Tataviam Band of Mission Indians Tribal Historic and Cultural Preservation Officer, replied and acknowledged consultation with the City on the Proposed Project.

The HMNH campus is in an urbanized area that supports a variety of institutional, residential, office, and public facilities land uses. The Project Site involves two previously disturbed sites on the HMNH campus—an existing parking structure (PS-4) and an existing surface parking lot (Lot D). Given that the Project Site has been subject to grading and development in the past, culturally significant tribal resources that may have existed at one time have likely been previously disturbed.

4.7.2. REGULATORY FRAMEWORK

STATE

Assembly Bill 52 (AB 52)

California law protects Native American burials, skeletal remains, and associated grave items regardless of the age of such items, and provides for the sensitive treatment and disposition of remains. Specifically, Governor Brown signed AB 52 on September 25, 2014, which established that

[1] Vasquez Rocks is a 745-acre park of unique geological rock formations near Agua Dulce Springs.

[2] City of Santa Clarita, *General Plan, Conservation and Open Space Element*, 2011.

[3] Fernandeño Tataviam Band of Mission Indians, *Fernandeño Tataviam Band of Mission Indians, Historical Tribal Territory*, 2015.

[4] Jerry Reynolds, "Bower's Cave," *The Signal*, December 14, 1984.

CEQA analyses of project impacts on cultural resources must include whether a project would impact tribal cultural resources.[5]

PRC Section 21074 states that tribal cultural resources are either of the following:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

    a. Included or determined to be eligible for inclusion in the California Register of Historic Places; or

    b. Included in a local register of historic resources as defined in subdivision (k) of Section 5020.1.

2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resources to a California Native American tribe.

Further, PRC Section 21074 states that a cultural landscape that meets the criteria above is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. A historical resource described in PRC Section 21084.1, a unique archaeological resource as defined in subdivision (g) of PRC Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of PRC Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

The lead agency is also required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project, if: 1) the tribe requested to the lead agency in writing to be informed of proposed projects in that geographic area; and 2) the tribe requests consultation within 30 days of receipt of formal notification.

PRC Section 21084.3 states that public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource and provides examples of mitigation measures that can be implemented to avoid or minimize the significant adverse impacts. The consultation process ends when both parties agree to measures to avoid or mitigate significant effects on tribal cultural resources or when one of the parties, in good faith, concludes that mutual agreement cannot be reached.

If there are any human remains accidently discovered during the process of construction, CEQA Guidelines Section 15064.5(d-e) addresses consultation requirements, along with California Health and Safety Code Section 7050.5 and PRC Section 5097.98.

[5] Specifically, AB 52 amended PRC Section 5097.94 and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21084.2, and 21084.3.

Executive Order B-10-11

On September 19, 2011, Governor Brown issued Executive Order B-10-11, which established the Governor's Office of the Tribal Advisor and a State policy that all agencies and departments shall encourage communication and consultation with California Indian tribes and allow tribal governments to provide meaningful input into proposed decisions and policies that may affect tribal communities.

California Health and Safety Code Section 7050.5

California Health and Safety Code Section 7050.5 provides for treatment of human remains exposed during construction. No further disturbance may occur until the county coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. The coroner has 24 hours to notify the NAHC if the remains are determined to be of Native American descent. The NAHC will contact most likely descendants (MLD), who may recommend how to proceed.

Public Resources Code Section 5097.98

PRC Section 5097.98 provides a protocol for notifying the MLD of the deceased if human remains are determined to be Native American in origin. It also provides mandated measures for appropriate treatment and disposition of exhumed remains.

LOCAL

City of Santa Clarita General Plan

Applicable goals, objectives, and policies from the General Plan Conservation and Open Space Element are listed below.[6]

Cultural and Historical Resources

- Goal CO 5: Protection of historical and culturally significant resources that contribute to community identity and a sense of history.
  - Objective CO 5.3 Encourage conservation and preservation of Native American cultural places, including prehistoric, archaeological, cultural, spiritual, and ceremonial sites on both public and private lands, throughout all stages of the planning and development process.
    - Policy CO 5.3.1: For any proposed general plan amendment, specific plan, or specific plan amendment, notify and consult with any California Native American tribes on the contact list maintained by the California Native American Heritage Commission that have traditional lands located within the City's jurisdiction, regarding any potential impacts to Native American resources from the proposed action, pursuant to State guidelines.
    - Policy CO 5.3.2: For any proposed development project that may have a potential impact on Native American cultural resources, provide notification to California Native American tribes on the contact list maintained by the Native American

[6] City of Santa Clarita, *General Plan, Conservation and Open Space Element*, 2011.

Heritage Commission that have traditional lands within the City's jurisdiction, and consider the input received prior to a discretionary decision.

- Policy CO 5.3.3: Review and consider a cultural resources study for any new grading or development in areas identified as having a high potential for Native American resources, and incorporate recommendations into the project approval as appropriate to mitigate impacts to cultural resources.

4.7.3. CONSIDERATION AND DISCUSSION OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

In accordance with CEQA Guidelines Appendix G, the Project would have a significant impact on tribal cultural resources if it would:

Threshold (a) **Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

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

METHODOLOGY

Pursuant to AB 52, the Fernandeño Tataviam Band of Mission Indians was notified and provided an opportunity to request consultation in order to address potential impacts associated with tribal cultural resources. An examination of the tribal territory, as depicted by the Fernandeño Tataviam Band of Mission Indians, was conducted to determine if former tribal areas overlapped with the vicinity of the Project Site. Further, the Office of Historic Preservation's California Historical Resources list was examined to determine proximity of listed landmarks, points of interest, and resources to the Project Site.

PROJECT IMPACTS

Threshold (a): **Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

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

In compliance with the requirements of AB 52, the City provided formal notification of the Proposed Project on September 10, 2018, to the Fernandeño Tataviam Band of Mission Indians. A response dated June 21, 2019, was provided to the City from the Tribal Historic and Cultural Preservation Officer, Mr. Avila, of the Fernandeño Tataviam Band of Mission Indians. In the response, Mr. Avila acknowledged commencing consultation with the City. Formal consultation between the City and the Fernandeño Tataviam Band of Mission Indians was completed on February 27, 2020 (see **Appendix G**).

In addition to consultation, the Proposed Project lies within territory historically claimed by the Fernandeño Tataviam Band of Mission Indians. However, the location of the Project Site does not lie within any specific tribal areas as specified by the Fernandeño Tataviam Band of Mission Indians.[7] Further, a search of the California Historical Resources list from the Office of Historic Preservation showed only three listed sites in Santa Clarita, none of which are on or near the Project Site.[8]

The Proposed Project consists of two new buildings to be constructed on what is currently Parking Lot D. These buildings would both have basements and would require maximum depth of excavation between 15 to 25 feet below grade. The soil on Parking Lot D has already been partially disturbed from its development into a parking lot. Further, construction of the IP-1 Building directly adjacent to Lot D also includes a below-grade basement of approximately the same depth. No tribal cultural resources were found during the excavation phase of construction for this building.

Finally, PS-4 requires no below-grade excavation as it is being built on top of an existing subterranean parking structure and surface parking lot. Accordingly, no ground-disturbing activities would be required by this component of the Project. Therefore, no impact to tribal cultural resources would occur with the construction of PS-4.

Due to the Project's proposed location, the lack of listed sites, and no former tribal areas in the direct vicinity, impacts on tribal cultural resources were determined to be less than significant. However, the applicant has entered into an agreement with the Fernandeño Tataviam Band of Mission Indians that will include Native American monitoring during initial grading operations

7 Fernandeño Tataviam Band of Mission Indians, *Fernandeño Tataviam Band of Mission Indians, Historical Tribal Territory*, https://www.tataviam-nsn.us/wp-content/uploads/2012/01/Tataviam-Tribal-Territory-Map-2015.jpg, accessed August 27, 2019.

8 Office of Historic Preservation, *California Historical Resources*, http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=19, accessed August 27, 2019.

(excavation) of the Lot D area. Based on this information, the City, in its discretion and supported by substantial evidence, finds that the Project Site does not contain any resources determined by the City to be significant pursuant to the criteria set forth in Subdivision (c) of PRC Section 5024.1. Accordingly, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

Impacts to tribal cultural resources were not directly evaluated in the 2008 Master Plan EIR. However, the Initial Study prepared in 2006 as part of the 2008 Master Plan EIR indicated that no archaeological resources were previously identified during the construction of the existing campus. The Initial Study also indicated that implementation of the Master Plan would not have the potential to cause a physical change that would affect unique ethnic cultural values because the HMNH campus has been disturbed with no previous indication of cultural value at the site. The Proposed Project would not result in any new impacts beyond those previously disclosed in the 2006 Initial Study. Both the D&T Building and IP-2 Building would be built on what is currently Parking Lot D, which has been previously disturbed and surrounded by buildings that required excavation to accommodate a basement level similar to the Proposed Project. Accordingly, discovery of tribal cultural resources at the Project Site is considered unlikely. In addition, the applicant has entered into an agreement with the Fernandeño Tataviam Band of Mission Indians that will include Native American monitoring during initial grading activities (excavation) of Lots D and I, as well as part of Lot H.

Mitigation Measures

Impacts related to tribal cultural resources would be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts related to tribal cultural resources would be less than significant without mitigation.

4.7.4. CUMULATIVE IMPACTS

As discussed above, there are no tribal cultural resources located on the Project Site. However, in the event that tribal cultural resources are uncovered, any reasonably foreseeable projects in the City would be required to comply with applicable regulatory requirements discussed in detail above in Section 4.7.2. Any cumulative impacts to tribal cultural resources would be reduced by compliance with applicable regulatory requirements. In addition, other reasonably foreseeable projects would be required to comply with AB 52 to determine and mitigate any potential impacts to tribal cultural resources. Therefore, cumulative impacts to tribal cultural resources would be less than significant.

This section of the Draft SEIR analyzes the Project-related impacts to wastewater conveyance and treatment facilities, as well as to water supply and the water infrastructure system serving the Project Site. Potential impacts to other types of utilities (i.e., stormwater drainage, solid waste collection and disposal, and telecommunications) were determined to be less than significant as discussed in Chapter 7, Effects Not Found to be Significant, of this Draft SEIR.

4.8.1. ENVIRONMENTAL SETTING

WASTEWATER GENERATION

Wastewater Collection and Treatment Systems

Most wastewater generated within Santa Clarita is treated by the Santa Clarita Valley Sanitation District (SCVSD), which includes two existing water reclamation plants (WRPs) operated by the Sanitation Districts of Los Angeles County (Sanitation Districts, LACSD). These are the Saugus WRP and the Valencia WRP, which are interconnected, forming the Santa Clarita Valley Joint Sewerage System (SCVJSS). The joint powers agreement that created the regional system allows the Valencia WRP to accept flows that exceed the capacity of the Saugus WRP. The water is treated to tertiary levels (biological treatment followed by filtration and disinfection) and is discharged to the Santa Clara River. The Saugus WRP is located at 26200 Springbrook Avenue in the City of Santa Clarita and provides primary, secondary, and tertiary treatment for 6.5 million gallons per day (mgd) of wastewater.[1] The Valencia WRP is located at 28185 The Old Road in the community of Valencia, in Los Angeles County unincorporated area, and provides primary, secondary, and tertiary treatment for 21.6 mgd of wastewater.[2] The Valencia WRP also has solids processing facilities and processes all wastewater solids generated in the SCVSD. Information gathered for a nearby project found that the interconnected SCVJSS has a combined water treatment capacity of 28.1 mgd and currently produces an average recycled water flow of 13.5 mgd.[3]

The mechanism that is used to fund expansion of the treatment system is the Sanitation Districts' Connection Fee Program. The program requires all new users of the sewerage system, as well as existing users of the sewerage system who expand their discharge, to pay a connection fee to the Sanitation Districts based upon the quantity and strength of the wastewater discharge. The rate at which revenue is generated through this program drives the rate at which the Sanitation Districts periodically expands the system. The Sanitation Districts does not issue connection permits unless the existing system has sufficient capacity to serve a proposed development. Therefore, the expansion of wastewater treatment facilities may be either immediate to serve a new development or incremental if it is determined that the system can accommodate the proposed development but not future phases of development. In the latter scenario, the funds would be

1 Sanitation Districts of Los Angeles County, Saugus Water Reclamation Plant, https://www.lacsd.org/services/wastewater/wwfacilities/wwtreatmentplant/saugus_wrp.asp, accessed January 23, 2020.

2 Sanitation Districts of Los Angeles County, Valencia Water Reclamation Plant, https://www.lacsd.org/wastewater/wwfacilities/scvwrp/valencia_wrp.asp, accessed January 23, 2020.

3 Correspondence between Adriana Raza, Customer Service Specialist, Facilities Planning Department, Sanitation Districts of Los Angeles County and Stephanie Zinn, Project Manager, Fuscoe Engineering, re: Westfield Valencia Town Center Patios Connection Project, dated April 8, 2019.

deposited into a Capital Improvement Fund, which would be restricted to fund the future expansion of the system.[4]

Sanitation Districts' Sewer System Management Plan

The Sanitation Districts prepared a Sewer System Management Plan (SSMP) in 2019 for their service area, which includes 78 cities and unincorporated area across 850 square miles (including the Santa Clarita Valley and the Project Site).[5] The SSMP includes four goals to ensure that the Sanitation Districts' collection system facilities are properly managed, operated, and maintained to eliminate preventable sanitary sewer overflows (SSOs). These goals ensure that (1) response measures are in place and that all feasible steps are taken to mitigate the impacts of SSOs to the public and the environment when they occur; (2) reporting procedures are in place to notify the appropriate regulatory and health authorities of SSOs within the required time frames; and (3) SSO events, mitigation measures, and corrective actions are documented. The SSMP also includes a sewer system evaluation and capacity assurance plan, which is designed to evaluate sewer system capacity and prioritize/budget relief projects for key sewer system components. Table 8-1 of the SSMP shows that the Valencia trunk sewer line has a "C" rating, meaning that peak dry weather flow depth is at 70 to 80 percent pipe diameter. The estimated design and construction of a relief project for the Valencia trunk sewer is anticipated to take place between 2030 and 2033.

Wastewater Collection System

The SCVSD owns, operates, and maintains the wastewater conveyance system for the Santa Clarita Valley, which consists of a 34-mile long, interconnected network of trunk sewers and two pumping plants.[6] The system conveys wastewater and wastewater solids from the local sewer lines, which are either owned by the City of Santa Clarita or Los Angeles County, to the Saugus and Valencia WRPs.

The HMNH campus utilizes an on-site wastewater collection system to convey wastewater flow from the HMNH campus to water mains maintained by the SCVSD. Local conveyance facilities within the HMNH campus consist of 8-inch, 10-inch, and 12-inch pipelines. An 8-inch sewer main extends from the northwest boundary of the HMNH campus and connects to a 10-inch private sewer main located near the intersection of Ramillo Way and Dalgo Drive, southwest of the HMNH campus. The 10-inch sewer main is connected at the southwest corner of the HMNH campus and drains to the residential tracts west of the HMNH campus. Wastewater flows to the northeast along the HMNH campus boundary until it reaches the Valencia trunk sewer, which is maintained by the Sanitation Districts. This trunk sewer is 18 inches in diameter and located in a private right-of-way along the western (southbound) side of McBean Parkway, just north of Avenida Navarre. According to the Sanitation Districts, the 18-inch-diameter Valencia trunk sewer has a capacity of 6.8 mgd and conveyed a peak flow of 5 mgd when last measured in 2012.[7] Thus, this trunk sewer

[4] Sanitation Districts of Los Angeles County, Connection Fee Program, https://www.lacsd.org/services/wastewater/industrial_waste/iwpolicies/connection_fee_program.asp, accessed November 22, 2019.

[5] Sanitation Districts of Los Angeles County, Sewer System Management Plan (SSMP), February 20190.

[6] Sanitation Districts of Los Angeles County, Wastewater Collection Systems, https://www.lacsd.org/services/wastewater/wwfacilities/wcs.asp, accessed January 23, 2020.

[7] Sanitation Districts of Los Angeles County, NOP Response to Master Case No. 17-193, Letter from Adriana Raza, Customer Service Specialist, September 27, 2018.

has a capacity of 1.8 mgd. Recent information gathered for a nearby project determined that the Valencia trunk sewer is 21 inches in diameter near the intersection of McBean Parkway and Town Center Drive (north of the Project Site) and has a capacity 7.9 mgd with a peak flow of 4.8 mgd when last measured in 2018.[8] The Valencia trunk sewer conveys wastewater to the Sanitation Districts' District No. 32 main relief trunk sewer, located in Magic Mountain Parkway at McBean Parkway. This main relief trunk sewer is 36 inches in diameter, has a capacity of 57.7 mgd, and conveyed a peak flow of 11.8 mgd when last measured in 2018.[9]

Wastewater Generation

Currently, the HMNH campus generates an estimated 234,730 gallons per day (gpd) of wastewater, as presented in **Table 4.8-1**, below.

Table 4.8-1
Existing Wastewater generation for the Henry Mayo Newhall Hospital campus

Existing Uses	LACSD Generation Factor	Existing Units	Wastewater Generation
Inpatient Building No. 1	319 gpd/bed	118 beds	37,642 gpd
Main Hospital	319 gpd/bed	136 beds	43,384 gpd
Nursing Pavilion	319 gpd/bed	106 beds	33,814 gpd
Medical Office Building 1	300 gpd/1,000 sf	176,160 sf	88,848 gpd
Medical Office Building A	300 gpd/1,000 sf	5,302 sf	1,590 gpd
Medical Office Building B	300 gpd/1,000 sf	5,302 sf	1,590 gpd
Medical Office Building C	300 gpd/1,000 sf	5,302 sf	1,590 gpd
Medical Office Building D	300 gpd/1,000 sf	5,302 sf	1,590 gpd
Medical Office Building E	300 gpd/1,000 sf	31,040 sf	9,312 gpd
Medical Office Building F	300 gpd/1,000 sf	43,912 sf	13,173 gpd
Support Facilities	25 gpd/1,000 sf	24,425 sf	611 gpd
Main Hospital Building Basement	300 gpd/1,000 sf	5,286 sf	1,586 gpd
TOTAL			234,730 gpd

Source: City of Santa Clarita, 2008, Henry Mayo Newhall Hospital Master Plan EIR.
Notes: sf = square feet

WATER DEMAND, SUPPLY, AND INFRASTRUCTURE

The law forming the Santa Clarita Valley Water Agency (SCV Water) went into effect on January 1, 2018.[10] It was created by an act of the California legislature (Senate Bill [SB] 634) through the merger of the three water agencies in the Santa Clarita Valley and serves a population of 273,000 through 70,000 retail water connections. The merger included Castaic Lake Water Agency (CLWA) and its Santa Clarita Water Division, the Newhall County Water District, and the Valencia Water Company. The CLWA was initially formed in 1962 as a wholesale water agency to acquire, treat, and deliver State Water Project (SWP) water from the California Department of Water Resources (DWR) to purveyors throughout the Santa Clarita Valley. The Santa Clarita Water Division, Newhall County Water District, and the Valencia Water Company were the retail water

[8] Correspondence between Adriana Raza, Customer Service Specialist, Facilities Planning Department, Sanitation Districts of Los Angeles County and Stephanie Zinn, Project Manager, Fuscoe Engineering, re: Westfield Valencia Town Center Patios Connection Project, dated April 8, 2019.

[9] Correspondence between Adriana Raza, Customer Service Specialist, Facilities Planning Department, Sanitation Districts of Los Angeles County and Stephanie Zinn, Project Manager, Fuscoe Engineering, re: Westfield Valencia Town Center Patios Connection Project, dated April 8, 2019.

[10] Senate Bill 634, 1st Ex. Sess., Ch. 28, 2017.

purveyors with whom CLWA contracted. In total, SCV Water serves a population of 273,000 in approximately 195 square miles or 124,000 acres.

Prior to the formation of SCV Water, the Valencia Water Company was the water purveyor for the HMNH campus and prepared a Water Supply Assessment for the HMNH Master Plan EIR in 2008. The Valencia Water Company became the Valencia Water Division (a division of SCV Water), which now supplies customers in Valencia, Stevenson Ranch, Saugus, Newhall, and parts of Castaic.

Historically, the water demand in the Santa Clarita Valley was for agricultural use. Between the 1940s and the 1960s, agricultural water use ranged from about 27,000 acre-feet per year (afy) to 42,000 afy, which was solely supplied by groundwater sources. This agricultural water demand has decreased over time to 13,100 af in 2018 from 15,000 afy in the late 1990s. SCV Water expects agricultural use to decrease to approximately 7,000 afy by the 2020s.[11] The first record of municipal water use was in 1960 and consisted of roughly 5,000 afy drawn from groundwater.

Groundwater

The Project Site is located within the Santa Clara River Valley Groundwater Basin (Basin), East Subbasin (identified in DWR Bulletin 118). This subbasin is composed of two aquifer systems, the Alluvium and the Saugus Formation.[12] The Alluvium is mostly found under the Santa Clara River and its tributaries, while the Saugus Formation is typically deeper and is found underlying most of the upper Santa Clara River areas.

As stated in the 2008 EIR developed for the HMNH Master Plan, the groundwater component of overall water supply in the Santa Clarita Valley derives from a groundwater operating plan developed by the groups that now make up SCV Water—Castaic Lake Water Agency (CLWA) and the local retail purveyors—over the past 20 years to meet water requirements (municipal, agricultural, small domestic), while maintaining the Basin in a sustainable condition (i.e., no long-term depletion of groundwater or interrelated surface water). The resulting Groundwater Management Plan (GWMP) was developed in December 2003, in accordance with California Water Code Section 10753. This plan contains four management objectives for the Basin: (1) meet existing and projected demands for municipal, agricultural, and other water uses through the development of an integrated surface water, groundwater, and recycled water supply; (2) assess and quantify the Basin's conditions and yields to avoid overdraft and its effects, as well as to assist in managing groundwater levels so as not to negatively affect surface and groundwater discharges to downstream basins; (3) preserve groundwater quality, which includes identifying and resolving groundwater contamination issues; and (4) preserve surface water resources through proper management of groundwater.

the GWMP was updated and included as part of the 2015 Urban Water Management Plan (UWMP), is based on the concept that pumping can vary from year to year to allow increased groundwater usage in dry periods and increased recharge during wet periods, and to collectively assure that the Basin is adequately replenished through various wet/dry cycles. An updated

[11] Santa Clarita Valley Water Agency and Los Angeles County Waterworks District 36, 2018 Santa Clarita Valley Water Report, May 2019.

[12] Castaic Lake Water Agency, Groundwater Management Plan, Santa Clara River Valley Groundwater Basin, East Subbasin, Los Angeles County, California, 2003.

evaluation of groundwater basin yield from 2009 was used to develop the groundwater operating plan in the 2015 UWMP, which includes pumping 30,000 to 40,000 afy following wet/normal years and slightly reduced pumping (30,000 to 35,000 afy) following dry years from the Alluvium aquifer. In 2018, groundwater pumping from the Alluvium aquifer by SCV Water was approximately 26,450 af, which was approximately 4,450 af more than what was pumped in 2017 and is below the UWMP's operating plan range for a dry year. Specifically, the Valencia Water Division pumped 10,837 af of water from the Alluvium Formation in 2018.[13] This increase is the result of decreased use of imported water (e.g., from the SWP). According to the 2018 Santa Clarita Valley Water Report, there were no adverse effects on groundwater levels or storage in the Basin that did not normally occur during previous dry periods in the Basin. Further, on a long-term basis (over multiple decades), there is no evidence of any trend toward permanent water level or storage decline in the Alluvium or Saugus Formations.[14] As also stated in the 2018 Report, levels in the Alluvium aquifer have generally varied within predictable ranges that are associated with climatic fluctuations during the last 35 years (i.e., short-term declines during dry periods followed by recoveries during wet periods). This indicates that the Alluvium aquifer remains in good operating condition and can continue to support pumping in the operating range specified by the 2015 UWMP, or slightly higher without long-term impacts, such as water level decline or degradation of groundwater quality.[15]

The 2015 UWMP's groundwater operating plan also includes pumping from the Saugus Formation. Normal years will range from 7,500 to 15,000 afy and dry years have planned pumping ranging from 15,000 to 35,000 afy for one to three consecutive dry years. As with the Alluvium aquifer, these ranges are based on the 2009 evaluation of groundwater basin yield, which found them to be sustainable on a long-term basis.[16] Pumping from the Saugus Formation by SCV Water totaled 9,450 af in 2018, which was approximately 1,550 af more than in 2017; of this 2018 total, the Valencia Water Division pumped 2,837 af.[17] The pumping rates for the Saugus Formation remain near the mid to lower end of the ranges included in the groundwater operating plan, allowing groundwater levels in the Saugus Formation to remain relatively constant over the last 40 to 45 years.

Imported Water

Valencia Water Division (part of SCV Water) received 55 percent of its water from imported sources in 2018.[18] As of 2018, the imported water supplies consist of a combination of SWP water, water acquired from the Buena Vista Water Storage District, the Rosedale-Rio Bravo Water Storage District (in Kern County), and Yuba County Water Agency purchases and banked water. Annually, SCV Water receives 11,000 af of water through the exchange of SWP water from the Buena Vista

[13] Santa Clarita Valley Water Agency and Los Angeles County Waterworks District 36, 2018 Santa Clarita Valley Water Report, Table 2-1, 2019.

[14] Santa Clarita Valley Water Agency and Los Angeles County Waterworks District 36, 2018 Santa Clarita Valley Water Report, 2019.

[15] Santa Clarita Valley Water Agency and Los Angeles County Waterworks District 36, 2018 Santa Clarita Valley Water Report, 2019.

[16] Santa Clarita Valley Water Agency and Los Angeles County Waterworks District 36, 2018 Santa Clarita Valley Water Report, 2019.

[17] Santa Clarita Valley Water Agency and Los Angeles County Waterworks District 36, 2018 Santa Clarita Valley Water Report, Table 2-1, 2019.

[18] Santa Clarita Valley Water Agency and Los Angeles County Waterworks District 36, 2018 Santa Clarita Valley Water Report, 2019.

or Rosedale-Rio Bravo Districts. In 2018, SCV Water imported 76,108 af of water from the SWP and 11,000 af of water from the Buena Vista/Rosedale Rio-Bravo Districts.[19]

Recycled Water

CLWA began a recycled water service in July 2003, and it has continued with SCV Water. Approximately 400 af of recycled water was used in 2018 for irrigation and other non-potable uses. This is generally consistent with recycled water deliveries that have ranged between 300 afy and 500 afy over the past 15 years. In 2017, SCV Water updated its Recycled Water Master Plan with projections for recycled water use as well as short-, mid-, and long-term objectives for increasing the use of recycled water where it is economically feasible.[20]

Planned Water Supplies and Projected Water Demand

As stated above, SCV Water uses a mix of groundwater, imported water, recycled water, and water obtained through banking or exchanges. **Table 4.8-2**, below, summarizes SCV Water's projected existing and planned water supply sources for the period ranging from 2020 to 2050, as reported in the 2015 UWMP.

Table 4.8-2
Summary of Existing and Planned Water Supplies (Acre-Feet)[a]

	2020	2025	2030	2035	2040	2045	2050
Existing Supplies							
Groundwater[b]	31,545	31,545	31,545	31,545	31,545	31,545	31,545
Imported Water	78,467	78,167	75,587	75,387	75,387	75,387	75,387
Recycled Water	450	450	450	450	450	450	450
Banking/Exchange Programs	22,950	12,950	12,950	12,950	12,950	12,950	7,950
Total Existing	133,412	123,112	120,532	120,332	120,332	120,332	115,332
Planned New Supplies							
Groundwater	5,230	7,230	8,230	10,230	10,230	10,230	10,230
Recycled	565	5,156	7,627	9,604	9,604	9,604	9,604
Banking/Exchange Programs	7,000	7,000	17,000	17,000	17,000	17,000	22,000
Total Planned	12,795	19,386	32,857	36,834	36,834	36,834	41,834

Source: CLWA, CLWA Santa Clarita Water Division, Newhall County Water District, and Valencia Water Company, 2015 Urban Water Management Plan for Santa Clarita Valley, June 2016, Table 3-1, p. 3-2–3-3.

[a] The values shown under "Existing Supplies" and "Planned Supplies" are projected to be available in average/normal years. The values shown under "Existing Banking and Exchange Programs" and "Planned Banking Programs" are the maximum capacity of program withdrawals, and would typically be used only during dry years.

[b] Existing groundwater supplies represent the quantity of groundwater anticipated to be pumped with existing wells.

The total water demand for the SCV Water service area in 2018, reported by the 2018 Santa Clarita Valley Water Report, was approximately 78,300 af, consisting of approximately 65,200 af for municipal use and 13,100 af for agricultural and other (miscellaneous) uses. While this value is above the projected water demand in the 2015 UWMP (which is attributed to weather conditions and the easing of State-mandated water conservation measures in 2015), the demand is less than

[19] Santa Clarita Valley Water Agency and Los Angeles County Waterworks District 36, 2018 Santa Clarita Valley Water Report, 2019.

[20] Santa Clarita Valley Water Agency and Los Angeles County Waterworks District 36, 2018 Santa Clarita Valley Water Report, 2019.

the total available water supplies.[21] **Table 4.8-3**, below, summarizes the total projected demand for the SCV Water service area in five-year increments, beginning in 2020, as provided in the UWMP.

Table 4.8-3
Summary of Projected Water Demand for Entire SCV Water Service Area (Acre-Feet)[a]

	2020	2025	2030	2035	2040	2045	2050
NCWD	10,100	10,700	11,200	11,800	12,600	13,400	14,200
SCWD	28,400	29,100	29,900	30,800	32,400	33,900	36,000
VWC	28,100	32,100	36,600	40,000	39,600	39,300	39,000
LACWWD #36[b]	2,300	2,700	3,100	3,500	3,900	4,300	4,700
Total Demand	**68,900**	**74,600**	**80,800**	**86,100**	**88,500**	**90,900**	**93,900**

Source: CLWA, CLWA Santa Clarita Water Division, Newhall County Water District, and Valencia Water Company, 2015 Urban Water Management Plan for Santa Clarita Valley, June 2016, Table 2-2, p. 2-6.

[a] Values rounded to the nearest hundred. Demands include savings from plumbing code and standards and active conservation as assumed in the 2015 Santa Clarita Valley Water Use Efficiency Strategic Plan.

[b] LACWWD 36 future demand was based on a growth projection factor and not on land use. LACWWD #36 is included for purposes of providing regional completeness.

Projected water supply and demand under a multiple dry year scenario is shown in **Table 4.8-4**, below. While water demand is anticipated to be elevated during a multiple dry year scenario, water supplies are anticipated to sufficiently meet anticipated demand.

Table 4.8-4
SCV Water Supply and Demand Under a Multiple Dry Year Scenario[a]

	2020	2025	2030	2035	2040	2045	2050
Projected Existing Supplies	98,597	96,097	94,752	94,752	94,752	94,752	89,752
Planned Supplies	24,440	31,031	44,502	48,479	48,479	48,479	53,479
Demand	75,800	82,100	88,900	94,700	97,400	100,000	103,300
Difference	47,240	46,028	50,354	48,531	45,831	43,231	39,931

Source: CLWA, CLWA Santa Clarita Water Division, Newhall County Water District, and Valencia Water Company, 2015 Urban Water Management Plan for Santa Clarita Valley, June 2016, Table 6-4A, p. 6-14.

[a] The Multiple Dry Year scenario displayed in this table is the projected four-year dry year scenario. Demands include savings from plumbing code and standards and active conservation as assumed in the 2015 Santa Clarita Valley Water Use Efficiency Strategic Plan.

Water Infrastructure

As stated above, Valencia Water Division is the water purveyor for the HMNH campus. Valencia Water Division serves 31,500 connections, 90 percent of which are residential customers, with 365 miles of pipe, and 22 wells.[22] The HMNH campus has an internal network of water lines, which connect to a 12-inch water line operated by SCV Water located in McBean Parkway.

[21] Santa Clarita Valley Water Agency and Los Angeles County Waterworks District 36, 2018 Santa Clarita Valley Water Report, 2019.

[22] Valencia Water Company, Cost of Service Study 2018-2020, September 2017.

4.8.2. REGULATORY FRAMEWORK

WASTEWATER GENERATION

Federal

Clean Water Act

National Pollutant Discharge Elimination System Permits

The National Pollutant Discharge Elimination System (NPDES) permit system was established as part of the Clean Water Act to regulate discharges from all point sources. Through this system, point sources of pollution must obtain a discharge permit from the proper authority, often a state, federal agency, such as the U.S. Environmental Protection Agency (USEPA), a tribe, or a territory. The NPDES permits cover industrial and municipal discharges, storm sewer discharges in larger cities, stormwater associated with industrial activity, runoff from construction sites disturbing more than one acre, mining operations, and animal feedlots and aquaculture facilities above certain thresholds. For point source discharges, such as municipal sewage plants and industrial uses, each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge. Indirect dischargers, those that send wastewater into city sewer systems, so it eventually goes to a sewage treatment plant, are not required to obtain NPDES permits. These indirect discharges are covered by another Clean Water Act program, called pretreatment.

National Pretreatment Program

The National Pretreatment Program requires industrial and commercial dischargers to obtain permits or other control mechanisms to discharge wastewater to a publicly owned treatment works (POTW).[23] POTWs collect wastewater from homes, commercial buildings, and industrial facilities and transport it via a collection system to the treatment plant. Pretreatment refers to requirements for nonresidential uses to control discharges; adhere to federal, State, and local government standards protecting municipal wastewater treatment plants from damage that may occur when hazardous, toxic, or other wastes are discharged into a sewer system; and protect the quality of sludge generated by these treatment plants.

State

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) is responsible for ensuring the highest reasonable quality of waters of the State, while allocating those waters to achieve the optimum balance of beneficial uses. Per Title 23, Part 26 of the California Code of Regulations (CCR), the board oversees the Wastewater Treatment Plant Classification, Operator Certification, and Contract Operator Registration Program, which is designed to protect public health and the environment by providing for the effective operation of wastewater and water recycling treatment plants through the certification of wastewater treatment plant operators.

[23] U.S. Environmental Protection Agency, Introduction to the National Pretreatment Program, EPA-833-B-11-001, June 2011.

Local

City of Santa Clarita General Plan

Applicable goals, objectives, and policies from the General Plan Land Use Element are listed below.

Public Facilities

- Goal LU 9: Adequate public facilities and services, provided in a timely manner and in appropriate locations to serve existing and future residents and businesses.
  - Objective LU 9.1: Coordinate land use planning with provision of adequate public service and facilities to support development.
    - Policy LU 9.1.1: Ensure construction of adequate infrastructure to meet the needs of new development prior to occupancy.
  - Objective LU 9.2: Coordination of City and County sewer master planning and sewer mitigation to support future development and avoid fiscal impacts to local government or the existing community.
    - Policy LU 9.2.2: Require that all new development mitigates its impact on existing sewer capacity by upgrading facilities when warranted or payment of a fee to allow construction of new facilities when needed.
    - Policy 9.2.4: Facilitate the efficient construction of sewer infrastructure by sizing facilities to accommodate anticipated future sewer flows within the sewershed.
    - Policy 9.2.5: Cooperate with the development community to allow reimbursement for the cost of constructed sewer facilities with a capacity that exceeds what would be required to mitigate a project's own sewer impact.
    - Policy 9.2.6: Coordinate to ensure that new development projects have agreed to mitigate both City and County sewer impacts prior to project approval.

WATER SUPPLY

Federal

Safe Drinking Water Act

Congress originally passed the Safe Drinking Water Act (SDWA) in 1974 to protect public health by regulating the nation's public drinking water supply. The SDWA was amended in 1986 and 1996 and requires many actions to protect drinking water and its sources: rivers, lakes, reservoirs, springs, and groundwater wells. The act applies to every public water system in the U.S. but does not regulate private wells that serve fewer than 25 individuals.

The SDWA authorizes the USEPA to set national health-based standards for drinking water to protect against both naturally occurring and man-made contaminants that may be found in drinking water. Originally, the SDWA focused primarily on treatment as the means of providing safe drinking water at the tap. The 1996 amendments changed the existing law by recognizing source water protection, operator training, funding for water system improvements, and public

information as important components of safe drinking water. This approach is intended to ensure the quality of drinking water by protecting it from source to tap.

State

California Water Plan

The California Water Plan is the State's blueprint for integrated water management and sustainability. The DWR updates the plan approximately every five years. The California Water Plan is a Statewide strategic plan for water management to the year 2050. The plan includes a framework and resource management strategies promoting two major initiatives: integrated regional water management that enables regions to implement strategies appropriate for their own needs, helping them become more self-sufficient; and improved Statewide water management systems that provide for upgrades to large physical facilities, such as the SWP, and Statewide management programs essential to California's economy.

Urban Water Management Planning Act

In 1983, the California legislature enacted the Urban Water Management Planning Act to create California Water Code Sections 10610–10656. The act states that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000 af of water annually, should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. The act describes the contents of UWMPs, as well as how urban water suppliers should adopt and implement the plans. It is the act's intention to permit levels of water management planning commensurate with the numbers of customers served and the volume of water supplied. As stated above, the CLWA, which is now part of SCV Water, adopted the 2015 UWMP in June 2016. The UWMP provides a detailed summary of present and future water resources and demands within the Santa Clarita Valley service area and assesses its water resource needs. Specifically, the UWMP provides water supply planning for a 25-year planning period in five-year increments and identifies water supplies needed to meet existing and future demands.

Senate Bill 610

SB 610 (California Water Code Section 10910[c][2]) makes changes to the Urban Water Management Planning Act to require additional information in UWMPs if groundwater is identified as a source available to the supplier. Required information includes a copy of any groundwater management plan adopted by the supplier, a copy of the adjudication order or decree for adjudicated basins, and if non-adjudicated, whether the basin has been identified as being overdrafted or projected to be overdrafted in the most current DWR publication on that basin. If the basin is in overdraft, the plan must include current efforts to eliminate any long-term overdraft. A key provision in SB 610 requires that any project subject to CEQA supplied with water from a public water system be provided a specified water supply assessment (WSA), except as specified in the law. WSAs are required under SB 610 for projects that include 500 units of residential development (or projects that would demand an amount of water equivalent to, or greater than, the amount of water required by a project with 500 dwelling units) and for projects that would increase the number of the public water system's existing service connections by 10 percent. In accordance with California Water Code Section 10912, projects subject to CEQA requiring submittal of a WSA include the following:

- Residential developments of more than 500 dwelling units;
- Shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet (sf) of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 sf of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plant, or industrial park of more than 40 acres of land, more than 650,000 sf of floor area, or employing more than 1,000 persons;
- Mixed-use projects that include one or more of the above-identified categories; or
- A project that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling unit project.

The Proposed Project is not subject to assessment under SB 610, since the proposed IP-2 and D&T Buildings would be less than 250,000 sf (the D&T Building and the IP-2 Building are estimated to total 200,000 sf), would employ less than 1,000 new persons, and would not exceed water demand equivalent to or greater than that of a 500-dwelling unit project. As such, a WSA is not necessary for purposes of this Supplemental EIR.

Senate Bill X7-7 (Chapter 4, Statutes of 2009)

SBx7-7, the Water Conservation Act of 2009, requires the State to achieve a 20 percent reduction in urban per capita water use by December 31, 2020. The responsibility for this conservation falls to local water agencies, which must increase water use efficiency through promotion of water conservation standards that are consistent with the California Urban Water Conservation Council's best management practices. Each urban retail water supplier was also required to develop urban water use targets and an interim urban water use target by July 1, 2011, based on the alternative methods set out in the 2009 act.

California Plumbing Code

Title 24, Part 5 of the CCR establishes the California Plumbing Code, which sets efficiency standards, such as maximum flow rates, for all new federally regulated plumbing fittings and fixtures, including showerheads and lavatory faucets.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act of 2014 comprised several Assembly and Senate Bills (AB 1739, SB 1168, and SB 1319) and requires local agencies to adopt groundwater management plans that are tailored to the resources and needs of their communities. This act requires formation of local groundwater sustainability agencies to assess local water basin conditions and adopt locally based management plans. These plans were to achieve long-term groundwater sustainability, and protect existing surface water and groundwater rights. This act provides local groundwater sustainability agencies with the authority to require registration of groundwater wells, measure and manage extractions, require reports, assess fees, and revise groundwater basin boundaries. The DWR released a Draft Groundwater Sustainability Program Strategic Plan in March 2015. This plan aims to document the DWR strategy in helping to implement

groundwater sustainability; share information with those who have interests in or management responsibilities for groundwater; and describe the structure through which DWR implements specific actions in coordination with stakeholders and partners.

State Model Water Efficient Landscape Ordinance

The State Model Water Efficient Landscape Ordinance (MWELO) promotes the efficient use of water in new or retrofitted landscapes by establishing irrigation system efficiency standards which include greywater usage, on-site stormwater capture, limiting the percentage of turf planted in new landscapes, and reporting on the implementation and enforcement of the ordinance by local agencies. Local agencies are required to either adopt the MWELO or adopt a local ordinance which must be at least as effective in conserving water as MWELO. Section 17.51.030 of the City of Santa Clarita Municipal Code (SCMC) implements the provisions of the MWELO at the local level.

Local

2015 Santa Clarita Urban Water Management Plan

The 2015 UWMP was prepared for the CLWA and was adopted on June 8, 2016, prior to the creation of SCV Water. The 2015 UWMP provides a broad perspective on a number of water supply issues and is a planning tool that generally guides water supply and resource management in the Santa Clarita Valley. The 2015 UWMP includes water supply and demand forecasts that are based on the population projections contained in the general plans of the jurisdictions that are located within the SCV Water service area. The 2015 UWMP also discusses the implementation of water conservation measures.

Santa Clarita Municipal Code

Chapter 9.38 – Water Conservation

SCMC Chapter 9.38 (Sections 9.38.010 through 9.38.050) establishes water use guidelines and restrictions, which reinforce the water use reduction goals established in the Water Shortage Contingency Plan adopted by the CLWA. This chapter outlines both the appropriate water use restrictions in response to drought conditions and the continual water use practices that outline the measures for efficient use of water in irrigation and indoor plumbing, including drought-tolerant landscaping and low-flow fixtures.

Section 17.51.030 Development Standards – Landscaping and Irrigation Standards

SCMC Section 17.51.030 sets forth the landscaping and irrigation standards for all new development in the City and codifies the implementation of the State MWELO. Specifically, the purpose of this section is to encourage the efficient use of water through appropriate low water-using plant materials, water-conserving irrigation design, and regular maintenance of landscaped areas. Furthermore, the intent of this section is to encourage the appropriate design, installation, maintenance, and management of landscapes so that water demand can be reduced, runoff can be retained, and flooding can be reduced without a decline in the quality or quantity of landscapes. Lastly, this section is intended to promote the conservation of potable water by maximizing the use of recycled water and other water-conserving technology for appropriate applications.

City of Santa Clarita General Plan

Applicable goals, objectives, and policies from the General Plan Land Use and Conservation and Open Space Elements are listed below.

Land Use Element: Environmentally Responsible Development

- Goal LU 7: Environmentally responsible development through site planning, building design, waste reduction, and responsible stewardship of resources.
  - Objective LU 7.2: Ensure an adequate water supply to meet the demands of growth.
    - Policy LU 7.2.3: Require that all new development proposals demonstrate a sufficient and sustainable water supply prior to approval.
  - Objective LU 7.4: Promote water conservation through building and site design.
    - Policy LU 7.4.1: Require the use of drought tolerate landscaping, native California Plant materials, and evapotranspiration irrigation systems.
    - Policy LU 7.4.2: Require the use of low-flow fixtures in all non-residential development and residential development with five or more dwelling units, which may include but are not limited to water conserving shower heads, toilets, waterless urinals and motion-sensor faucets, and encourage use of such fixtures in building retrofits as appropriate.

Conservation and Open Space Element: Water Resources

- Goal CO 4: An adequate supply of clean water to meet the needs of present and future residents and businesses, balanced with the needs of natural ecosystems.
  - Objective CO 4.1: Promote water conservation as a critical component of ensuring adequate water supply for Santa Clarita Valley residents and businesses.
    - Policy CO 4.1.3: Require low water use landscaping in new residential subdivisions and other private development projects, including a reduction in the amount of turf-grass.
    - Policy CO 4.1.5: Promote the use of low-flow and/or waterless plumbing fixtures and appliances in all new non-residential development and residential development of five or more dwelling units.
    - Policy CO 4.1.7: Apply water conservation policies to all pending development projects, including approved tentative subdivision maps to the extent permitted by law. Where precluded from adding requirements by vested entitlements, encourage water conservation in construction and landscape design.
  - Objective CO 4.2: Work with water providers and other agencies to identify and implement programs to increase water supplies to meet the needs of future growth.
    - Policy CO 4.2.2: Require new development to provide the infrastructure needed for delivery of recycled water to the property for use in irrigation, even if the

recycled water main delivery lines have not yet reached the site, where deemed appropriate by the reviewing authority.

- Policy CO 4.2.3: Promote the installation of rainwater capture and gray water systems in new development for irrigation, where feasible and practicable.
- Policy CO 4.2.6: Require that all new development proposals demonstrate a sufficient and sustainable water supply prior to approval.

4.8.3. CONSIDERATION AND DISCUSSION OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

In accordance with CEQA Guidelines Appendix G, the Proposed Project would have a significant impact on utilities and service systems if it would:

Threshold (a) **Require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects;**

Threshold (b) **Have insufficient water supplies available to serve the Project from existing entitlements and resources, requiring new or expanded entitlements; or**

Threshold (c) **Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.**

Section 7.0, Effects Not Found to be Significant, of this Draft SEIR contains brief statements indicating the reasons that various possible significant effects of the Project were determined not to be significant and, therefore, are not discussed in this section, pursuant to Section 15128 of the CEQA Guidelines. As described in Section 7.0, the Proposed Project would not have significant effects relating to impacts concerning stormwater drainage, solid waste collection and disposal, and telecommunications. Further, impacts relating to electricity and natural gas are addressed in Section 4.3, Energy, of this Draft SEIR.

METHODOLOGY

Wastewater Generation

This analysis is based on information provided by Sanitation Districts and details of the Project. The Proposed Project's new and existing uses were taken into account to determine the significance, if any, of the Project's impacts.

Water Supply

This analysis is based on information obtained from SCV Water and Project details. The Proposed Project's estimated water demand is calculated using demand factors for the Project's domestic and irrigation demands as provided by SCV Water and is analyzed relative to the available water supply during average/normal years projected in the 2015 UWMP. The Proposed Project's new and existing uses were taken into account to determine the significance, if any, of the Project's impacts.

PROJECT IMPACTS

Threshold (a): Require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects.

Threshold (c): Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.

As stated in the Project Description, the Proposed Project and the resulting expanded medical facilities would allow for all State and local regulations and codes to be met while not increasing the intensity of usage. Expanding the parking structure would not result in an increase in wastewater generation.

While the proposed IP-2 Building would contain 92 hospital beds, these 92 beds currently exist on the HMNH campus and would be moved from the Main Hospital Building. Therefore, the beds in IP-2 Building would not be new and already are currently generating wastewater as part of the existing campus uses. Similarly, while the D&T Building would include diagnostic and treatment facilities, these uses currently exist and are located in the Main Hospital Building. Therefore, the uses in the D&T Building would not be new and are also currently generating wastewater as part of the existing campus uses. Further, due to increases in water efficiency standards (i.e., State and local water conservation building codes and design requirements), the wastewater generation of IP-2 Building and the D&T Building would be lower than the current generation of similar facilities in the current configuration of the Main Hospital Building. IP-2 Building and the D&T Building would, therefore, not require or result in the relocation or construction of new or expanded wastewater treatment facilities.

A total of 138,000 square feet in the Main Hospital Building would be repurposed as part of the Proposed Project and would include procedure rooms, storage, administrative office space, imaging and physical therapy, MRI, and waiting areas. While this expanded office space would allow for new employees, the total number of new employees would be minimal. Because uses that would occupy the 200,000 square feet of space in IP-2 Building and the D&T Building are currently located in 138,000 square feet of space in the Main Hospital Building, backfilling this space represents the only portion of the Proposed Project that would result in a measurable increase in wastewater generation. The wastewater generation associated with these uses in the Main Hospital Building would be 41,400 gpd.[24] This is a conservative estimate because these uses already exist in other portions of the HMNH campus (in smaller spaces) and are, therefore, already included in the HMNH campus totals wastewater generation values provided in **Table 4.8-1**. Further, renovation of the space in the Main Hospital Building to accommodate these uses would involve installation of new water-efficient plumbing fixtures as required by State and local regulations (such as California Building Code, Title 24), which would reduce the amount of wastewater generated in the Main Hospital Building.

[24] The area of the Main Hospital Building to be backfilled as part of the Proposed Project is 138,000 square feet. The wastewater generation factor for a medical office building, which would be the most appropriate factor given the types of uses that would fill this area, is 300 gpd/1,000 square feet of area. Therefore, the wastewater generation for this area would be 138,000 square feet x (300 gpd/1,000 square feet) = 41,400 gpd of wastewater.

As stated above, the SCVJSS has a total permitted wastewater treatment capacity of 28.1 mgd and the Sanitation Districts' trunk sewer located in McBean Parkway near Avenida Navarre has an available capacity of 1.8 mgd. The Proposed Project's 41,400 gpd of wastewater generation would represent approximately 2 percent of the existing capacity of the trunk sewer line located in McBean Parkway that serves the Project Site. Further, wastewater infrastructure capacity to serve the Project would be confirmed during the Sanitation Districts' required preconstruction review of Project plans and supporting information.[25] Therefore, because the Proposed Project would generate a relatively small amount of wastewater compared with existing uses on the campus and because the Sanitation Districts' local infrastructure has existing wastewater conveyance and treatment capacity to serve the Project, the addition of the new IP-2 Building and the D&T Building to the HMNH campus would not require or result in the relocation or construction of new or expanded wastewater treatment facilities and impacts would be less than significant.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

The 2008 Master Plan EIR Wastewater Section found that the 2008 Master Plan would not require the construction of new wastewater treatment facilities or the expansion of existing facilities to serve the facilities proposed in the Master Plan. The facilities proposed in the 2008 Master Plan would generate 105,543 gpd of wastewater in addition to the 101,468 gpd of wastewater generated by the HMNH buildings that existed at the time of the 2008 Master Plan EIR preparation. The resulting total wastewater generation was 207,011 gpd. The amount of wastewater generated by the HMNH has increased since the 2008 Master Plan EIR with implementation of the 2016 Specific Plan, bringing the total wastewater generation to 234,730 gpd, as shown in **Table 4.8-1**, above. The 2008 Master Plan EIR determined that the SCVJSS and the Valencia Trunk Sewer had sufficient permitted capacity to serve the facilities proposed in the Master Plan.

While the Proposed Project would add 200,000 square feet of building space, the beds and diagnostic and treatment uses that would fill these proposed buildings would originate from the existing Main Hospital Building on the HMNH campus. Accordingly, the wastewater generated by these uses has already been accounted for in the 2008 Master Plan EIR. As a result, the only new wastewater-generating uses associated with the Proposed Project would be the area within the existing Main Hospital Building containing the 92 beds that would be backfilled. As stated above, the conversion of this space would generate an additional 41,400 gpd of wastewater. This is a conservative estimate considering it does not account for the use of water-efficient plumbing fixtures required by State and local regulations. As such, the existing capacity of the Valencia Trunk Sewer and the SCVJSS would be sufficient to serve the minor increase of wastewater generation from the Proposed Project, and there would be no need to construct new or expand existing wastewater treatment facilities. Therefore, the Proposed Project would have a less-than-significant impact related to wastewater treatment facilities and infrastructure capacities and would not result in any additional impacts beyond those identified in the 2008 Master Plan EIR.

[25] Sanitation Districts of Los Angeles County, NOP Response to Master Case No. 17-193, Letter from Adriana Raza, Customer Service Specialist, September 27, 2018.

Mitigation Measures

The Proposed Project would not result in any additional impacts beyond those previously identified in the 2008 Master Plan EIR. Impacts related to wastewater treatment facilities and infrastructure capacities would be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts related to wastewater treatment facilities and infrastructure capacities were determined to be less than significant without mitigation.

Threshold (b): Would the project have insufficient water supplies available to serve the Project from existing entitlements and resources, requiring new or expanded entitlements?

As stated above, while the proposed IP-2 Building would contain 92 hospital beds, these 92 beds currently exist on the HMNH campus and would be moved from the Main Hospital Building. Similarly, while the D&T Building would include diagnostic and treatment facilities, these uses currently also exist in the Main Hospital Building. Therefore, the uses that would be located in IP-2 Building and the D&T Building would not be new and are currently generating water demand as part of the existing campus uses. Because uses that would occupy the 200,000 square feet of space in IP-2 Building and the D&T Building are currently located in 138,000 square feet of space in the Main Hospital Building, backfilling this space represents the only portion of the Proposed Project that would result in a measurable increase in water demand. The expansion of PS-4 would not result in a measurable increase in water demand; on-site parking structures are primarily swept, and there is minimal need for periodic pressure washing to remove oil stains.

It has been assumed that the Proposed Project's water demand would be approximately equal to the Project's calculated wastewater generation. This is a reasonable method for estimating water demand because the Project Site is surrounded by urban development and impervious surfaces, where landscaped areas represent a minor portion of the developed area. This method reasonably assumes that all water used by the Project would be discharged into the wastewater system through plumbing fixtures. As described above, the estimated increase in wastewater generation associated with the Proposed Project would be 41,400 gpd. Again, this is a conservative estimate as some of the uses that would occupy this area are already generating wastewater as part of the existing campus uses, and it does not take into account the low-flow fixtures and water conservation measures required by State and local regulations. As such, the Project's water demand would be approximately 41,400 gpd, or 46.4 af per year.[26]

As provided in the 2015 UWMP, and shown in **Table 4.8-2**, SCV Water has an estimated supply of 133,412 af with a total for planned new water supply of 12,795 af for the year 2020; 123,112 af existing and 19,386 af planned water supplies in 2025; and 120,532 af existing and 32,857 planned water supplies in 2030. The projected water demand, under normal conditions, for the SCV Water service area is 68,900 af in 2020, 74,600 af in 2025, and 80,800 af in 2030, as shown in **Table 4.8-3**. The difference between supply and demand is 64,512 af in 2020, 48,512 af in 2025, and 39,732 af in 2030 during normal conditions. Therefore, under normal conditions, the Proposed Project would

[26] 41,400 gallons per day of water demand * 365 days per year * (1 acre foot /325,851 gallons) = 46.37 acre feet of water demand per year.

represent approximately 0.07 percent, 0.1 percent, and 0.12 percent of 2020, 2025, and 2030 water surpluses, respectively.

As shown in **Table 4.8-4**, above, the difference between projected existing and planned water supplies and demand under a multiple dry year scenario is 47,240 af, 46,028 af, and 50,354 af in 2020, 2025, and 2030, respectively. This demonstrates that SCV Water has sufficient water supply to provide 46.4 afy to meet the projected needs of the Proposed Project during normal and multiple dry years.[27]

Regarding water delivery infrastructure, IP-2 Building and the D&T Building would connect to the HMNH campus's existing internal network of water service lines. These lines connect to an existing 12-inch water line operated by SCV Water, located in McBean Parkway. As such, while the Project would require connections to the internal water line network within the HMNH campus, the impacts from this connection are included in the analysis of construction impacts for the proposed structures. As such, no further analysis of impacts associated with water line connections is necessary.

Because SCV Water has sufficient capacity to serve the Project and because water service infrastructure already exists within McBean Parkway, the Project would not have insufficient water supplies available to serve the project, and would not require new or expanded water facilities resulting in a less-than-significant impact.

Comparison with 2008 Henry Mayo Newhall Hospital Master Plan EIR

The 2008 Master Plan EIR Water Section established that the completed HMNH campus would have a demand of 205 afy during a normal year and 226 afy during a dry year. The 2008 Master Plan determined that the Valencia Water Division would be able to supply water to the HMNH campus with the existing facilities, even during multiple dry years occurring consecutively.

While the Proposed Project would add 200,000 square feet of building space, the beds and diagnostic and treatment uses that would fill these proposed buildings would originate from the existing Main Hospital Building on the HMNH campus. Accordingly, water consumption by these uses has already been accounted for in the 2008 Master Plan EIR. As a result, the increase in water consumption associated with the Proposed Project would be from the area within the existing Main Hospital Building containing the 92 beds that would be backfilled. As stated above, the projected water demand for the Proposed Project would be 46.4 afy, which is a conservative estimate considering that the Project must adhere to required State and local water conservation measures when retrofitting the Main Hospital Building. SCV Water and Valencia Water Division would be able to supply water to the Proposed Project without having to expand, construct, or relocate water facilities, during normal and multiple dry years occurring consecutively.

Because the Project would result in a minor increase in water demand and sufficient water supplies are available to serve the Project, the Proposed Project would have a less-than-significant impact related to water supply and would not result in any additional impacts beyond those identified in the 2008 Master Plan EIR.

[27] Kennedy/Jenks Consultants, 2016 Urban Water Management Plan for Santa Clarita Valley, 2017.

Mitigation Measures

The Proposed Project would not result in any additional impacts beyond those previously identified in the 2008 Master Plan EIR. Impacts related to water supply were determined to be less than significant. Therefore, no mitigation measures would be required.

Level of Significance After Mitigation

Impacts related to water supply would be less than significant without mitigation.

4.8.4. CUMULATIVE IMPACTS

WASTEWATER GENERATION

Impacts associated with wastewater generation vary depending on the type and scale of an individual project and are, therefore, analyzed on a project-by-project basis. As identified above, while the Proposed Project would result in an increase in wastewater generation, the existing SCVJSS and the trunk sewer within McBean Parkway both have sufficient capacity to serve the Project.

With the existing capacities of the SCVJSS and the trunk sewer within McBean Parkway, there appears to be sufficient capacity to accommodate wastewater discharges from pending projects that would discharge into the trunk sewer in McBean Parkway. This would be confirmed on an incremental basis, as every project proposing a connection to a sewer main owned by the Sanitation Districts must be approved by the Sanitation Districts and pay a connection fee prior to receiving approved building permits from the City. Therefore, because the City and the Sanitation Districts would review site-specific development plans to determine potential impacts on the wastewater system (i.e., the SCVJSS or specific trunk sewer mains), and projects would be required to pay a connection fee to mitigate impacts of the development, the cumulative impact of the Project and other projects discharging to the McBean Parkway trunk sewer and the SCVJSS would be less than significant.[28]

WATER SUPPLY

Impacts associated with water demand vary depending on the type and scale of an individual project and are, therefore, analyzed on a project-by-project basis. As identified above, the Project Site is served by SCV Water.

The water supply for SCV Water, as demonstrated in **Tables 4.8-2** through **4.8-4**, exceeds the projected demand, during both normal rainfall and multiple dry year scenarios. The UWMP prepared by SCV Water for the Santa Clarita Valley takes future water demands of proposed development projects (identified through the City's General Plan) into account when planning for near-term and long-term water supply needs. As stated above, the Proposed Project would not require the relocation or construction of new water supply facilities to meet the Project's water demand. Other future projects in the SCV Water service area that are subject to review under CEQA would be reviewed by the City to determine if the project is consistent with the City's General Plan. If a project is inconsistent with the City's land use policies, then an analysis of the

[28] Sanitation Districts of Los Angeles County, Connection Fee Program, https://www.lacsd.org/services/wastewater/industrial_waste/iwpolicies/connection_fee_program.asp, accessed November 22, 2019.

water demand compared to the demand of what would be allowed under the adopted land use policies would be required. If the projected water demand of a future project would substantially exceed what would normally occur, mitigation measures or a project alternative could be imposed to reduce or offset that additional water demand impact. Further, each individual project's interior and exterior water systems must comply with the City's water conservation standards, as set forth in the SCMC and administered through the City's building permit process. The UWMP is updated on five-year cycles to enable updated forecasts of water demand and reliability of water supplies and account for changes in actual development patterns and updated growth forecasts. Therefore, with regular UWMP updates, compliance with the City's General Plan and the SCMC, as well as implementation of project-specific mitigation measures that may be warranted for projects with extraordinary water demands, cumulative impacts to water supplies and infrastructure would be less than significant.

5.1. Purpose and Scope

CEQA Guidelines Sections 15126.6 (a) and 15126.6(b) state that "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. … Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."

In accordance with CEQA Guidelines Section 15126.6, this Draft SEIR contains a comparative impact assessment of alternatives, including the No Project Alternative, as required by CEQA Guidelines Section 15126.6(e), that would lessen the significant impacts of the Proposed Project, as identified in Sections 4.1 through 4.8 of this Draft SEIR. This section also briefly discusses alternatives that were considered by the lead agency but rejected from further analysis in this Draft SEIR.

Additionally, CEQA Guidelines Section 15163(b) states that a Supplemental EIR need contain only the information necessary to make the previous EIR adequate for the Project as amended. The 2008 Master Plan EIR determined that all environmental impacts resulting from implementation of the Master Plan would be less than significant or reduced to less than significant upon incorporation of the mitigation measures in that document with the exception of the following impacts, which were determined to be significant and unavoidable:

- Traffic impacts at the intersections of McBean Parkway at Valencia Road and at Orchard Village Road;
- Localized air pollutant emissions during construction activities;
- Cumulative construction-related air quality impacts;
- Short-term noise impacts during construction activities; and
- Project-level and cumulative impacts related to solid waste services.

The analyses presented in Sections 4.1 through 4.8 of this Draft SEIR determined that the Proposed Project would not generate new impacts beyond those identified in the 2008 Master Plan EIR, including a significant and unavoidable impact related to short-term construction noise.

Therefore, the alternative identified in this Draft SEIR, in addition to the No Project Alternative, was selected considering the extent to which the alternative would (1) meet most of the objectives of the Proposed Project and (2) avoid or lessen the impacts of the Proposed Project related to short-term construction noise and with consideration given to other alternatives that were rejected.

As identified in Section 3.0, Project Description, of this Draft SEIR, the objectives of the Proposed Project are as follows:

- Help meet the health care needs of Santa Clarita Valley's existing population and planned future population growth.
- Implement a long-term plan for expansion of the existing HMNH campus that would help meet the expected growth in demand for health care services and allow the hospital to apply for State-required approvals.
- Enhance and expand the HMNH to provide patients with personalized care, state-of-the-art medical technology, and a professional staff within a single HMNH campus environment.
- Accommodate expansion that would bring two new buildings online over time as needed while ensuring the continuance of existing operations and enabling further expansion of needed facilities.
- Maintain the viability of the hospital on a site that would continue to be centrally located within the HMNH's 680-square-mile service area as the community grows.
- Implement a well-planned HMNH Master Plan campus that is attractive and promotes quality development consistent with the visual character of the Project area.
- Establish a campus that would attract and retain physician specialists and establish Centers of Excellence, which are defined as highly specialized health care services via physician or hospital-authorized providers or hospital collaboration around a disease category.
- Develop a medical campus designed with patients in mind by linking inpatient services and medical buildings in a single setting, providing safe access and transit opportunities.
- Minimize visual impacts of the HMNH campus using enhanced building design and landscaping and focusing more intensive development near the center of the site.
- Apply land use buffering techniques between the two new buildings (including required parking) and adjacent residential uses through use of building setbacks and enhanced landscaping.
- Continue to modernize and upgrade the HMNH campus and other on-site supportive mechanical facilities to ensure the long-term viability of existing and new buildings.
- Implement an efficient vehicular and pedestrian circulation system that ensures ease of movement throughout the site.
- Ensure that future development of the HMNH campus is served by adequate on-site parking facilities to accommodate patients, visitors, and medical staff.

5.2. Alternatives Considered but Rejected

CEQA Guidelines Section 15126.6(c) states that an EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible and briefly explain the reasons

underlying the lead agency's determination. According to CEQA Guidelines Section 15126.6(c), factors that may be used to eliminate alternatives from detailed consideration in an EIR include the alternative's (a) failure to meet most of the project objectives, (b) infeasibility, or (c) inability to avoid significant environmental impacts. Alternatives that were considered but rejected are discussed below.

5.2.1. REHABILITATION OF THE EXISTING MAIN HOSPITAL BUILDING

As discussed in Section 3.0, Project Description, rehabilitation of the existing Main Hospital Building to upgrade the beds and support services to conform to existing and future OSHPD requirements was considered. However, this alternative would be costlier than constructing new buildings. In addition, while this alternative would include the aboveground expansion of PS-4, it would not adequately achieve the Project objectives related to facility and campus expansion to meet the expected growth in demand for health care services in Santa Clarita Valley. To meet the expected demand, the HMNH is pursuing a project that would construct a new D&T Building and the IP-2 Building, both of which would be developed in compliance with new CBC and OSHPD regulations, in addition to parking supply and management improvements. The current Main Hospital Building would subsequently be converted to and backfilled with existing office, administrative, clinical/hospital support services (e.g., procedure rooms, imaging, magnetic resource imaging, physical/occupational/ speech therapy), and other support uses (e.g., storage) from other parts of the HMNH campus to meet the minimum size and space necessary to meet CBC and OSHPD regulations. Because of the failure of this alternative to meet most of the basic Project objectives, this alternative has been rejected.

5.2.2. CONSTRUCTION OF A NEW TOWER AT THE EXISTING MAIN HOSPITAL BUILDING LOCATION

Construction of a new tower at the existing Main Hospital Building location would involve demolition of the existing building to accommodate a new, much larger and taller building to meet most of the Project objectives. This building would be immediately adjacent to the IP-1 Building. Because the 2008 Master Plan EIR identified significant and unavoidable short-term noise impacts associated with construction of the IP-1 Building, the construction of a new tower at this location is not only expected to have similar significant and unavoidable noise impacts to the patients receiving in-patient care in the IP-1 Building, but the demolition activities would create new impacts, including those related to air quality, noise, and vibration, which would not occur under the Proposed Project. This alternative would include expansion to PS-4, as well as parking supply management improvements included in the Proposed Project, and would have similar significant and unavoidable construction noise impacts to the residences across McBean Parkway. Because of the inability of this alternative to avoid the significant noise impacts during construction, this alternative has been rejected.

5.2.3. ALTERNATIVE LOCATION ON THE HMNH CAMPUS

The HMNH campus is composed of two areas: the northern portion (north of the main driveway at Orchard Village Road), which is owned and operated by the HMNH, and the southern portion (south of the main driveway at Orchard Village Road), which is owned by a separate entity. The northern portion of the HMNH campus is primarily built out, with the exception of the Project Site. Therefore, no other location on the northern portion of the HMNH campus is available to accommodate the two new buildings proposed by the Project. Since the HMNH does not have ownership of the southern portion and cannot reasonably acquire, control, or have access to the

southern portion, the surface parking lots on the southwestern portion of the campus are not available as alternative locations to the Project Site. Because of the infeasibility of an alternative location on the HMNH campus, this alternative has been rejected.

5.2.4. ALTERNATIVE LOCATION OFF-SITE

Construction of a new D&T Building and a new IP-2 Building at an alternative location off-site would not achieve the Project objectives related to expansion within a single HMNH campus environment. The new buildings are intended to enhance and expand the HMNH to provide patients with personalized care, state-of-the-art medical technology, and a professional staff within a single HMNH campus environment. Locating the Project off-site would inhibit the ability for patients and staff to immediately and readily access other necessary existing uses within the HMNH campus, such as the nursing pavilion, emergency room facilities, and medical offices, without having to take a shuttle or generate a vehicular trip to and from the Project Site. Because of the inability of this alternative to meet the basic Project objectives, and because the HMNH does not own and cannot reasonably acquire, control, or have access to an adequate site within a functional distance of the existing HMNH campus, this alternative has been rejected.

5.3. Alternatives Selected for Evaluation

5.3.1. ALTERNATIVE 1: NO PROJECT/NO BUILD ALTERNATIVE

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that, "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, the No Project/No Build Alternative (Alternative 1) assumes that no new development would occur within the Project Site. The Project Site would continue to operate as paved surface parking lots (i.e., Lot D and Lot I, as well as Lot H) and a subterranean parking structure (i.e., PS-4).

5.3.2. ALTERNATIVE 2: REDUCED SIZE (80-PERCENT) ALTERNATIVE

Various alternatives were considered in Section 5.2, Alternatives Considered but Rejected, above, with the goal of substantially reducing, if not eliminating, the Project's significant construction noise impacts, which would occur during construction from the operation of construction equipment. Significant construction noise impacts would be expected to occur during construction on-site with any development scenario since any scenario would need to utilize the same construction equipment.

The Reduced Size (80-Percent) Alternative (Alternative 2) has been identified as an alternative that would attain all of the Project's objectives, with the exception of the second Project objective related to implementing a long-term plan for expansion of the existing HMNH campus that would help meet the expected growth in demand for health care services and allow the hospital to apply for State-required approvals, while shortening the duration of construction impacts when compared to the Proposed Project. Alternative 2 proposes similar buildings and uses to the Proposed Project but reduced by approximately 20 percent. More specifically, both the new D&T Building and IP-2 Building would be reduced by one level. The proposed D&T Building under this alternative would contain approximately 63,225 square feet of space and would be

approximately 40 feet in height. The proposed IP-2 Building under this alternative would contain approximately 96,417 square feet of space with approximately 74 beds and would be approximately 60 feet in height. Similar to the Proposed Project, the proposed buildings under this alternative would include a basement. In addition, as with the Proposed Project, the existing hospital's main entry would be relocated in front of the D&T Building, which would also require removal of 16 parking spaces from Lot H. Under this alternative, the proposed parking addition to PS-4 would be partially reduced (i.e., approximately half of the top level would not be needed) when compared to the Proposed Project. Alternative 2 would add approximately 233 new parking spaces to PS-4 through the construction of 2.5 aboveground levels on top of the existing subterranean structure/surface parking lot.

5.4. Comparative Assessment of Impacts

The following assessment compares the impacts of the Proposed Project as identified in Sections 4.1 through 4.8 of this Draft SEIR with the impacts of the two alternatives defined above.

5.4.1. AESTHETICS

Under Alternative 1, the Project Site would remain as existing, and, as such, no changes to the aesthetic character of the Project Site or light and glare conditions would occur. Alternative 1 would avoid the less-than-significant impacts of the Proposed Project related to the visual character or quality of the area and the Project Site and light and glare.

Similar to the Proposed Project, under Alternative 2, construction activities would be temporarily viewed by motorists and pedestrians traveling along McBean Parkway and Orchard Village Road. However, similar to the Proposed Project, short-term, construction-related impacts under Alternative 2 would also be less than significant given their short duration and the adherence to the mitigation measures that have been adopted by the City as part of the HMNH Master Plan approval.

During operation, the new D&T Building and IP-2 Building would be shorter under this alternative than the Proposed Project; similarly, views of these new buildings would likely be fleeting or obstructed by the existing buildings on the HMNH campus from motorists and pedestrians along McBean Parkway and Avenida Navarre. Similar to the Proposed Project, even with half of the top level not being constructed, views of the proposed addition to PS-4 would be similar in mass and scale to the 51-foot-high MOB-1 and 37.5-foot-high PS-1 located immediately northeast of MOB-1 along McBean Parkway and would be less than significant.

Similarly, although the new DT&T Building and IP-2 Building would be shorter under this alternative than the Proposed Project, light and glare produced by the new buildings would be similar to the existing buildings and parking structure on the HMNH campus. As with the Proposed Project, this alternative would comply with the City of Santa Clarita's outdoor lighting standards (Section 17.51.050, Outdoor Lighting Standards), which require all lights be directed downward and be shielded so as to avoid off-site glare. Further, lights would not be directed up, disturbing nighttime views. Similar to the Proposed Project, the buildings and parking structure addition under this alternative would not be constructed of glare-producing materials. As such, similar to the Proposed Project, this alternative would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. Similar to the Proposed Project,

Alternative 2 would have no additional impacts beyond those previously identified in the 2008 Master Plan EIR related to aesthetics, visual quality, or light and glare.

5.4.2. AIR QUALITY

Under Alternative 1, the Project Site would remain as existing, and, as such, no changes to air quality would occur. Alternative 1 would avoid the less-than-significant impacts of the Proposed Project related to construction and the less-than-significant impact with mitigation incorporated related to operation (associated with emergency generator emissions).

Under Alternative 2, the overall amount and duration of construction would be reduced in comparison to the Proposed Project. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Accordingly, because maximum daily conditions are used for measuring impact significance, regional and localized impacts on those days with maximum construction activities would be similar to the Proposed Project but would occur over a shorter construction duration and would be less than significant. As with the Proposed Project, operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips to the Project Site and energy consumption. As discussed below, development of Alternative 2 would result in fewer daily trips than the Proposed Project. As mobile-source emissions depend on the number of trips, mobile sources would result in a reduction in air emissions when compared to the Proposed Project. In addition, because the overall size of the proposed buildings would be reduced, demand for electricity and natural gas would be also be less than significant and less than the Proposed Project. Accordingly, similar to the Proposed Project, Alternative 2 would not conflict with or obstruct implementation of the 2016 AQMP or result in a cumulatively considerable increase in emission of a non-attainment pollutant. Similar to the Proposed Project, Alternative 2 would have no additional impacts beyond those previously identified in the 2008 Master Plan EIR related to air quality.

5.4.3. ENERGY

Under Alternative 1, the Project Site would remain as existing, and, as such, no changes to energy use on the HMNH campus would occur. Alternative 1 would avoid the less-than-significant impacts of the Proposed Project related to construction and operation.

Under Alternative 2, the overall amount and duration of construction would be reduced in comparison to the Proposed Project. As a result, the estimated energy consumption would be reduced compared to the Proposed Project. As with the Proposed Project, operation of Alternative 2 would generate an increased consumption of electricity and natural gas when compared to existing conditions. However, since Alternative 2 would result in a reduction in floor area compared to the Proposed Project, Alternative 2 would result in a lower net increase in electricity and natural gas consumption. Accordingly, Alternative 2 would not result in a wasteful, inefficient, or unnecessary consumption of energy resources during construction and operation; conflict with any adopted energy conservation plans, including those that address renewable energy and energy efficiency; or result or require the construction of new or expanded electric power or natural gas facilities, which could cause significant environmental effects; impacts to energy use and conservation under this alternative would be less than the Proposed Project. Similar to the Proposed Project, Alternative 2 would have no additional impacts beyond those previously identified in the 2008 Master Plan EIR related to energy use and conservation.

Greenhouse Gas Emissions

Under Alternative 1, the Project Site would remain as existing, and, as such, no changes to GHG emissions would occur. Alternative 1 would avoid the less-than-significant impacts of the Proposed Project related to GHG emissions.

Under Alternative 2, the overall amount of construction and floor area would be reduced in comparison to the Proposed Project because one less level would be developed in each of the buildings and parking structure addition. As a result, the estimated annual construction and operation GHG emissions would be slightly less than the Proposed Project and would be considered less than significant. Accordingly, similar to the Proposed Project, Alternative 2 would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with SCAG's 2016-2040 RTP/SCS, CARB's Scoping Plan, or any other applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Similar to the Proposed Project, Alternative 2 would have no additional impacts beyond those previously identified in the 2008 Master Plan EIR related to GHG emissions.

5.4.4. NOISE

Under Alternative 1, the Project Site would remain as existing, and, as such, no changes to the noise and vibration environment would occur. Alternative 1 would avoid the less-than-significant impacts of the Proposed Project related to off-site construction noise, on-site and off-site operation noise, and construction and operation vibration. Alternative 1 would also eliminate the significant and unavoidable noise impact during construction of the D&T Building and IP-2 Building on patients receiving inpatient care in the Main Hospital Building and in the IP-1 Building, and during construction of the addition of parking to PS-4 on the closest off-site residences across McBean Parkway.

Under Alternative 2, the overall amount and duration of construction would be reduced in comparison to the Proposed Project because one less level would be developed in each of the buildings and parking structure addition. However, on-site construction activities and the associated noise and vibration levels would be anticipated to be similar to the Proposed Project on those days with maximum construction activities. As a result, the noise levels during construction, including building construction, which is anticipated to generate the maximum noise levels, would remain in exceedance of the measured ambient noise level of 55 dBA L_{eq} near the southeastern corner of the Main Hospital Building by up to 35 dBA but would occur over a shorter construction duration. Nonetheless, construction noise impacts would be considered significant and unavoidable. Alternative 2 would also involve the addition of parking levels to PS-4. Although the construction duration would be shorter, noise levels associated with this addition would increase the ambient noise level of 70 dBA L_{eq} at the closest residence across McBean Parkway by 10 dBA, which would also be considered a significant and unavoidable impact. With regard to off-site construction and on-site and off-site operation noise and vibration, impacts resulting from Alternative 2 would be similar to the Proposed Project and would be less than significant. Similar to the Proposed Project and the 2008 Master Plan Project, Alternative 2 would result in significant and unavoidable on-site construction noise impacts despite mitigation measures. Due to the similarity in severity of these impacts, as with the Proposed Project, Alternative 2 would not produce a noticeable difference in noise impacts beyond those previously identified in the 2008 Master Plan EIR.

5.4.5. TRANSPORTATION

Under Alternative 1, the Project Site would remain as existing, and, as such, no changes to transportation, including trip generation and VMT, would occur. Alternative 1 would avoid the less-than-significant impacts of the Proposed Project related to transportation.

Under Alternative 2, similar buildings and uses to the Proposed Project are proposed but reduced by approximately 20 percent. Since the new buildings would accommodate uses that are currently in the existing Main Hospital Building, the building floor area within the existing Main Hospital Building that would be re-occupied would be approximately 20 percent less than the Proposed Project. As a result, because the trip generation forecast (utilized in Section 4.6, Transportation, of this Draft SEIR) is based on the potential new vehicle trips that may be generated through re-occupancy of the Main Hospital Building, Alternative 2 is forecast to generate a slightly lower net increase in daily trips than the Proposed Project. Accordingly, as with the Proposed Project, Alternative 2 is not expected to result in significant impacts at any of the 14 study intersections under Existing Conditions and Opening Year Conditions. Similar to the Proposed Project, Alternative 2 would not change the average trip length for the local area to affect the overall VMT and would be afforded the same accessibility to high-quality transit stops at the intersection of McBean Parkway and Avenida Navarre to promote an alternative mode of travel to the HMNH campus, thereby reducing vehicle trips and VMT. As such, the same magnitude of transportation impacts identified in Section 4.6, Transportation, of this Draft SEIR, including those related to trip generation, circulation, VMT, traffic hazards, and emergency access, would result from Alternative 2. Similar to the Proposed Project, Alternative 2 would have no additional impacts beyond those previously identified in the 2008 Master Plan EIR related to transportation.

5.4.6. TRIBAL CULTURAL RESOURCES

Under Alternative 1, the Project Site would remain as existing, and, similar to the Proposed Project, no impact to tribal cultural resources would occur.

Under Alternative 2, excavation and ground disturbance would be the same as the Proposed Project. Therefore, similar to the Proposed Project, due to the location, the lack of listed sites, and no former tribal areas in the direct vicinity, no impacts on tribal cultural resources would occur. Similar to the Proposed Project, Alternative 2 would have no additional impacts beyond those previously identified in the 2008 Master Plan EIR related to cultural resources. It should be noted that impacts to tribal cultural resources were not directly evaluated in the 2008 Master Plan EIR.

5.4.7. UTILITIES

Under Alternative 1, the Project Site would remain as existing, and, as such, no changes to the demand for public utilities, including wastewater conveyance and treatment facilities, as well as to the water supply and the water infrastructure system serving the Project Site, would occur. Alternative 1 would avoid the less-than-significant impacts of the Proposed Project related to utilities.

Under Alternative 2, similar buildings and uses to the Proposed Project are proposed but reduced by approximately 20 percent. Accordingly, slightly less impacts than those identified in Section 4.8, Utilities, of this Draft SEIR, including those related to wastewater conveyance and treatment facilities, as well as to the water supply and the water infrastructure system serving the Project Site,

would result from Alternative 2. However, similar to the Proposed Project, Alternative 2 would have no additional impacts beyond those previously identified in the 2008 Master Plan EIR related to utilities.

5.5. Environmentally Superior Alternative

Table 5-1 summarizes the determinations concerning the comparison of impacts between the Proposed Project and the two alternatives, including the No Project/No Build Alternative.

Table 5-1
Summary Comparison of the Impacts of Alternatives

Impact Topics	Impact Levels		
	Proposed Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Reduced Size (80-Percent) Alternative
Aesthetics	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)
Air Quality	Less Than Significant	Less (No Impact)	Similar during construction Less during operation (Less Than Significant)
Energy Consumption	Less Than Significant	Less (No Impact)	Less (Less Than Significant)
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)
Noise	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)
Transportation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)
Tribal Cultural Resources	No Impact	Similar (No Impact)	Similar (No Impact)
Utilities	Less Than Significant	Less (No Impact)	Less (Less Than Significant)

Based on the preceding analysis, the No Project/No Build Alternative would have the least impact as it would not alter the existing conditions and would not result in any of the short-term or long-term impacts that would occur as a result of the Proposed Project or Alternative 2. Section 15126.6(e)(2) of the State CEQA Guidelines requires that in those instances in which the No Project Alternative would be environmentally superior, the EIR must also identify which of the other alternatives would have the least environmental impact. The other alternative, Alternative 2, would be considered environmentally superior as it would have a slightly lesser level of impact during construction (e.g., energy, GHG emissions, and utilities) than the Proposed Project due to a shorter construction duration and overall reduction in building size and during operation (e.g., air quality, energy, GHG emissions, and utilities) due to an overall reduction in energy and utility consumption and overall daily trips generated by the addition to HMNH campus. However, neither alternative would meet the second Project objective related to implementing a long-term plan for expansion of the existing HMNH campus that would help meet the expected growth in demand for health care services and allow the hospital to apply for State-required approvals.

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6.1. Significant Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less-than-significant level. As evaluated in Sections 4.1 through 4.8 of this Draft SEIR, all impacts associated with the Proposed Project would be less than significant with the exception of one impact related to on-site noise during construction.

In examining the PS-4 construction noise levels at the closest residences, the 2008 EIR concluded that construction noise impacts would remain significant, even after the incorporation of mitigation measures. In that case, construction noise was estimated to exceed the threshold by 4 dBA. Noise levels from construction of the D&T Building/IP-2 Building as experienced in the vicinity of the Main Hospital Building and IP-1 Building would exceed the ambient noise level by up to 35 dBA. Individual noise control methods for construction activities typically achieve a reduction in the range of 5 to 6 dBA apiece. The suite of noise controls contained in **Mitigation Measures N1, N2, and S-N1** would likely be able to achieve an overall reduction of no more than 15 dBA L_{eq} at the façades of the adjacent Main Hospital Building and IP-1 Building. Feasible mitigation measures do not exist that would reduce construction noise levels at the Main Hospital Building and IP-1 Building southeastern façade by 35 dBA to a level of 65 dBA L_{eq}, 10 dBA above ambient. Consistent with the 2008 EIR conclusions, short-term construction noise impacts would remain significant and unavoidable. However, Project construction would not result in any additional impacts beyond those identified in the 2008 Master Plan EIR.

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

In addition to identification of the Proposed Project's significant unavoidable impacts, CEQA Guidelines Section 15126.2(c) also requires a description of the reasons why a project is being proposed, notwithstanding significant unavoidable impacts associated with the Proposed Project.

As discussed in Section 3.0, Project Description, of this Draft SEIR, the Project is being proposed, notwithstanding its significant and unavoidable on-site construction noise impacts because it would: (1) provide up-to-date hospital beds in the new IP-2 Building in order to comply with current and future Office of Statewide Health Planning and Development (OSHPD) codes and American with Disabilities Act (ADA) requirements; (2) offer supporting services in a new Diagnostic & Treatment (D&T) Building; and (3) meet parking demands to provide for the present and future health care needs of the Santa Clarita Valley. The Proposed Project would provide an opportunity to achieve an integrated, efficient, comprehensive health care facility to help serve the growing Santa Clarita Valley.

As discussed above, the Proposed Project would result in a significant and unavoidable impact related to on-site noise during construction. As evaluated in Section 5.0, Alternatives to the Proposed Project, of this Draft SEIR, alternatives to the Proposed Project were considered to eliminate the significant short-term on-site noise impacts during construction. As discussed therein, significant on-site construction noise impacts would be expected to occur with any development scenario because construction activities are inherently loud. Thus, reducing construction noise impacts below a level of significance at sensitive uses adjacent to the construction sites (i.e., Main

Hospital Building and IP-1 Building, as well as the residences across PS-4 along McBean Parkway) would be infeasible. Although Alternative 2, Reduced Size (80-Percent) Alternative, would reduce the overall amount of construction in comparison to the Proposed Project, on-site construction activities and associated noise levels would be anticipated to be similar to the Proposed Project on those days with maximum construction activities. As a result, noise levels during construction, including building construction, which is anticipated to generate the maximum noise levels, would remain in exceedance of the measured ambient noise level of 55 dBA L_{eq} near the southeastern corner of the Main Hospital Building by up to 35 dBA. Similarly, noise levels associated with the addition of parking levels to PS-4 would increase the ambient noise level of 70 dBA L_{eq} at the closest residence across McBean Parkway by 10 dBA. Although these on-site noise impacts would occur over a shorter construction duration, these impacts would remain significant and unavoidable. However, these impacts would be short-term and would cease upon completion of construction activities.

No feasible alternative was identified that would eliminate the Proposed Project's significant and unavoidable on-site construction impacts. The No Project/No Build Alternative would avoid the Proposed Project's significant and unavoidable on-site construction impacts. However, the No Project/No Build Alternative would not meet any of the Project objectives or the Proposed Project's underlying purpose described above.

Overall, the Proposed Project presents several benefits that override the limited and temporary adverse effects it may have on the environment.

6.3. Significant Irreversible Environmental Changes

According to CEQA Guidelines Sections 15126(c) and 15126.2(c), an EIR is required to address any significant irreversible environmental changes that would occur should the Proposed Project be implemented. As stated in CEQA Guidelines Section 15126.2(c):

> *Uses of non-renewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

6.3.1. USE OF NON-RENEWABLE RESOURCES

The Proposed Project would necessarily consume limited, slowly renewable and nonrenewable resources. This consumption would occur during the construction phase of the Proposed Project and would continue throughout its operational lifetime.

Project construction would require a commitment of resources that are non-replenishable or may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt, such as sand, gravel and stone; metals, such as steel, copper, and lead; petrochemical construction materials, such as plastics; and water. Furthermore, non-renewable

fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from the Project Site. However, use of such resources would not be unusual as compared to other construction projects and would not substantially affect the availability of such resources. Accordingly, these nonrenewable resources would not be used in a wasteful or inefficient manner.

Water, while an important natural resource, is not considered to be a non-renewable resource. Water is regularly replenished by the natural hydrological cycle. Because the Santa Clarita Valley and most of California is subject to recurring drought cycles, water is regarded as a limited resource that requires strong conservation measures to maintain adequate water supplies for normal and emergency applications.

The Proposed Project would be carried out in accordance with local and State regulations concerning building codes and safety and energy efficiency, including Title 24 requirements. To ensure the integrity of the built structures, nonrenewable resources, primarily in the form of fossil fuels, natural gas, and fuel oils for construction equipment and vehicles, would be used throughout the Proposed Project.

6.3.2. EXTENSION OF ROADS AND OTHER INFRASTRUCTURE

The Proposed Project represents an addition to the existing HMNH campus and would not extend roads or other infrastructure to an area not currently served by such roads and other infrastructure. Therefore, the Proposed Project would not provide access to a previously inaccessible area and commit future generations to such uses.

6.3.3. POTENTIAL ENVIRONMENTAL ACCIDENTS

The Proposed Project's use of hazardous materials is evaluated in Section 7.0, Effects Found Not to be Significant, of this Draft SEIR. As discussed therein, the types and amounts of hazardous materials that would be used in connection with the Proposed Project would be typical of those used in medical offices, cleaning and sterilization areas, and pharmacies. These materials include chemotherapy reagents; pharmaceuticals; chemicals used to sterilize equipment; formaldehyde for specimen preservation; and solvents, oxidizers, corrosives, and stains used in clinical laboratories. Radioactive materials are utilized at HMNH, which are primarily used to treat different forms of cancer; however, X-ray equipment is also regulated as radioactive material. The majority of the hazardous waste generated at HMNH generally results from the use of solvents, waste oil, and mixed oils. These wastes are shipped to hazardous waste storage and treatment facilities off-site in accordance with applicable standards and regulations. Regarding radioactive waste, the majority of radionuclides used to treat patients have half-lives of 52 days or less, so the hospital stores these on-site until their radioactivity decays to background levels, at which point they are disposed of as non-hazardous solid waste.[1] As a result of these disposal measures, the Proposed Project would not create a significant hazard to the public through the normal use of these materials or through a reasonably foreseeable upset or accident. Further, the materials used on-site would not release hazardous emissions that would significantly impact surrounding uses.

[1] City of Santa Clarita, *Henry Mayo Newhall Memorial Hospital Master Plan Environmental Impact Report*, 2008, Section 5.9 Hazards and Hazardous Waste.

Therefore, it is not expected that the Proposed Project would cause irreversible damage from environmental accidents associated with the use of typical, potentially hazardous materials.

6.3.4. JUSTIFICATION FOR IRRETRIEVABLE COMMITMENT OF RESOURCES

Implementation of the Proposed Project would require an investment of both renewable and non-renewable resources. However, as discussed above and in Section 4.3, Energy, of this Draft SEIR, the Proposed Project would not involve wasteful or inefficient methods of consuming energy during construction or over the long-term operating life. None of the building materials anticipated for the Proposed Project would be unique, rare, in short supply, or require creation of new resource extraction sites or new manufacturing and delivery channels.

Implementation of the Proposed Project would provide an opportunity to achieve an integrated, efficient, comprehensive health care facility by providing a medical facility that complies with current and future OSHPD codes and ADA requirements and supporting services to provide for the present and future health care needs of the Santa Clarita Valley.

Based on these considerations, the irretrievable commitment of renewable and non-renewable resources is justified.

6.4. Growth-inducing Impacts

CEQA Guidelines Section 15126.2(e) requires an EIR to discuss the ways a proposed project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth (e.g., the expansion of a wastewater treatment plant allowing more development in a service area) and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, pursuant to CEQA, growth must not be assumed as beneficial, detrimental, or of little significance to the environment. Growth can be induced by (1) direct growth associated with a project, and (2) indirect growth created by demand not satisfied by a project or the creation of surplus infrastructure not utilized by a project.

Project implementation would involve an intensification of land uses within previously disturbed areas on the HMNH campus. This would include construction of the new D&T Building and IP-2 Building on the site of existing surface parking lots (Lots D and I and part of Lot H), as well as expanding an existing subterranean parking structure/surface lot (PS-4) by 292 spaces through the addition of three aboveground levels. Because the Proposed Project would not include the construction of new housing that would generate new population, it would not result in direct population growth. In addition, the proposed D&T Building and IP-2 Building would accommodate uses that are primarily already operating within the existing Main Hospital Building and MOB-1. Accordingly, the existing uses to be accommodated by the Project would not generate a substantial increase in the number of employees on-site. The building floor area within the existing Main Hospital Building (approximately 138,000 square feet) would be backfilled with new hospital uses, including MRI space and procedure rooms and administrative office space (some of which would be shifted from the existing MOB-1), which would add 371 employees. The Southern California Association of Governments' 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) forecasts that total employment in Santa Clarita will increase

from 83,700 in 2020 to 91,300 in 2035 and 95,900 by 2040.[2] The employment growth of 371 employees associated with the Proposed Project would account for approximately 5 percent of the employment growth between 2020 and 2035 and would account for 3 percent of employment growth between 2020 and 2040. Given that some of the employment opportunities generated by the Proposed Project may be filled by people already residing in the vicinity of the HMNH campus or who would commute, the potential growth associated with new employees who may relocate their place of residence would not be substantial. In addition, the California Department of Finance indicates that as of January 2018, the City of Santa Clarita has a total of 74,294 housing units with a 4.2-percent vacancy rate.[3] Therefore, the current housing supply in Santa Clarita and surrounding areas would be sufficient to accommodate these new employees, and no additional housing would be required. As such, the Proposed Project would not indirectly induce substantial population growth.

In addition, the area surrounding the Project Site is already developed with a mix of commercial/retail uses, institutional uses, and residential uses; as such, the Proposed Project would not remove impediments to growth. The Proposed Project may require local infrastructure upgrades to maintain and improve sewer, electricity, and natural gas lines on-site and in the immediate vicinity of the HMNH campus; however, such improvements would be intended primarily to meet Project-related demand and would not necessitate regional utility infrastructure improvements that have not otherwise been accounted for and planned on a regional level. No extension of roads or infrastructure to areas that currently have no service would occur. Therefore, the Proposed Project would not result in growth-inducing impacts.

6.5. Potential Secondary Effects

CEQA Guidelines Section 15126.4(a)(1)(D) requires mitigation measures to be discussed in less detail than the significant effects of the Proposed Project if the mitigation measure(s) would cause one or more significant effects in addition to those that would be caused by the Project as proposed. As evaluated in Sections 4.1 through 4.8 of this Draft SEIR, all impacts associated with the Proposed Project would be less than significant with the exception of one impact related to on-site noise during construction. The analysis of the Proposed Project's impacts related to on-site noise during construction, which is addressed in Section 4.5, Noise, of this Draft SEIR, resulted in recommended mitigation measures. These measures involve requiring the Project contractor(s) to equip all construction equipment with properly operating mufflers, locating equipment staging areas away from noise-sensitive receptors, and placing all stationary construction equipment away from noise-sensitive receptors. No additional physical changes to the environment would result from the implementation of these measures beyond those that have been assumed in the analysis. Accordingly, it is concluded that these mitigation measures to reduce impacts related to on-site construction noise would not result in significant secondary impacts.

[2] Southern California Association of Governments, *2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction*, 2016.

[3] California Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2018*, May 2018.

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Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating the reasons that various possible significant effects of a project were determined not to be significant and, therefore, not discussed in detail in the EIR. The City of Santa Clarita issued a Notice of Preparation (NOP) for the Proposed Project on August 31, 2018, which identified the probable environmental effects of the Proposed Project that are to be addressed in the EIR. The NOP was circulated for a 30-day review period, during which no additional potential environmental effects were identified. In addition, while an Initial Study was not prepared for the Proposed Project, this Draft EIR is a supplemental document to the previously certified EIR for the Henry Mayo Newhall Hospital (HMNH) Master Plan [SCH# 2004111149, September 3, 2008]. An addendum to the 2008 EIR was prepared for the HMNH Specific Plan in March 2016. During that evaluation, certain impacts of the Proposed Project were found to be less than significant due to the inability of a project of this scope to create such impacts or the absence of project characteristics producing effects of this type. Accordingly, the effects determined not to be significant are not required to be included in the primary analysis sections of this Draft SEIR. A summary of the determination for each environmental issue that was found not to have a significant environmental effect is included below.

7.1. Aesthetics

As stated in Section 4.1, Aesthetics, Light, and Glare, of this Draft SEIR, the City of Santa Clarita General Plan Conservation and Open Space Element states that scenic resources "can include natural open spaces, topographic formations, and landscapes that contribute to a high level of visual quality."[1] The nearest open space area or natural landscape to the HMNH campus is the Newhall Creek wash, located southeast of the HMNH campus, northwest of the Railroad Avenue and Wiley Canyon Road intersection. Two significant ridgelines, as designated by the City, are located approximately 1.5 miles southwest and west of the Project Site.[2] These natural features are either fully obstructed or almost fully obstructed from view from the HMNH campus, from roadways immediately surrounding the Project Site, or from neighborhoods southeast and south of the Project Site. This is due to the distance and the existing urban development and mature landscaping between the Project vicinity and the natural features. The tops of the ridgelines are visible given their elevation between 100 feet and 200 feet above the level of the HMNH campus at McBean Parkway and Orchard Village Drive. However, the view is fleeting, highly obstructed, and not considered a scenic vista. Further, the proposed structures on Lots D and I and part of Lot H and PS-4 would not be in the viewshed of motorists and pedestrians using McBean Parkway and Orchard Village Road looking to the south and southeast.

Residences northwest of the Project Site are located at a higher elevation than the HMNH campus by approximately 40 to 100 feet; however, views of the proposed D&T Building, IP-2 Building, and PS-4 expansion are obstructed by a steep slope covered with mature conifer trees along the northern boundary of the HMNH campus, as well as the existing 47-foot-tall Main Hospital Building and the 84-foot-tall, 5-story IP-2 Building, as shown in **Figure 4.1-8** in Section 4.1, Aesthetics, Light, and Glare, of this Draft SEIR, which presents a cross-section of the Project Site looking northwest. While these residences may have views of topographical features in the distance, the Proposed Project is similar in height and bulk to existing buildings on the HMNH campus and would, therefore, not result in a substantial adverse effect on a panoramic view of a scenic vista or a specific view

[1] City of Santa Clarita, *General Plan Conservation and Open Space Element*, 2011, CO-53.

[2] City of Santa Clarita, *General Plan Conservation and Open Space Element*, 2011, Exhibit CO-1.

of a natural resource or feature of interest. Therefore, the Proposed Project would not represent a distinctive component of any scenic view given the distance between the Proposed Project and the scenic vista points, as well as the ranging topography throughout the Santa Clarita Valley.

The closest officially designated State scenic highway is part of the Angeles Crest Scenic Byway, State Route 2 (SR-2), from near La Cañada-Flintridge north to the San Bernardino County line. This State scenic highway is approximately 25 miles from the Project Site. Within the Santa Clarita area, Caltrans identifies Interstate 5 (I-5) as an eligible State scenic highway. The designated eligible segment of I-5 extends from the I-210 interchange to the SR-126/Newhall Ranch Road interchange and is located approximately 1 mile west of the Project Site. The distance from the Project Site, as well as obstruction of views by mature trees and existing buildings on-site, make it extremely unlikely that the HMNH campus is within the viewshed of a State scenic highway. Further, there are no unique topographic features located within the Project Site, such as trees, rock outcroppings, or ridgelines (see Section 4.1 Aesthetics, Light, and Glare, Figures 4.1-1 through 4.1-7). Therefore, no further analysis of these issues is required in this Draft SEIR.

As the Proposed Project would not have a substantial adverse effect on a scenic vista or scenic resources within a State scenic highway, no further evaluation of these topics is required in this Draft SEIR for these topics. See Section 4.1, Aesthetics, Light, and Glare, of this Draft SEIR for a full evaluation of the Proposed Project's effects on the visual character/quality of the Project Site and its surroundings. The Draft SEIR also includes analysis of potential sources of light and glare resulting from the Proposed Project and the effects on day and nighttime views in the area.

7.2. Agriculture and Forestry Resources

The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data that are used in analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. The maps are updated every two years with the use of a computer mapping system, aerial imagery, public review, and field reconnaissance. The FMMP produces Important Farmland Maps, which are a hybrid of resource quality (soils) and land use information. The Project Site is classified as "urban and built-up land" in the 2016 Los Angeles County Important Farmland Map.[3] The Proposed Project involves construction activities on already disturbed land, with construction of the D&T Building and IP-2 Building occurring within the footprint of existing surface parking lots (Lots D and I and part of Lot H), and the parking structure expansion occurring within the footprint of an existing subterranean parking structure/surface parking lot. As such, the Proposed Project would not impact Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

California Public Resources Code (PRC) Section 12220(g) defines forestland as land that is able to support 10 percent native tree cover under natural conditions and that allows for management of at least one forest resource. Timberland is a subset of forest land and under PRC Section 4526 is available and capable of growing commercial trees. The Project Site and the surrounding area

[3] California Department of Conservation, Division of Land Resource Protection, *Los Angeles County Important Farmland 2016*, July 2017.

are not zoned as forestland or timberland and do not meet the State's definition of forestland or timberland.

Further, the Project Site and the surrounding area are fully developed with residential uses to the east, southeast, south, west, and northwest; open space characterized by an extremely steep grade to the northwest; medical offices and a senior living facility to the north; and a church to the northeast. The Project Site is zoned Specific Plan (SP), and the surrounding uses are zoned Urban Residential (UR1 to the northwest and west, UR2 to the south and east, and UR4 to the north [senior housing]), Public/Institutional to the northeast, and Open Space to the northwest.[4] Therefore, the Project Site does not contain and is not surrounded by agricultural or forestland land uses. Further, the HMNH campus is not encumbered by a Williamson Act contract or any other sort of deed or land use restrictions intended to preserve or foster agricultural uses. As a result, the Proposed Project would not directly or indirectly convert farmland or forestland to non-agricultural or non-forest use or conflict with existing zoning for or cause rezoning of agricultural or forest land uses. No further analysis of these issues is required in this Draft SEIR.

7.3. Biological Resources

Biological resources are identified and protected through various federal, State, regional, and local laws and ordinances. The federal Endangered Species Act and the California Endangered Species Act state that animals and plants that are threatened with extinction or are in a significant decline will be protected and preserved. The U.S. Fish and Wildlife Service identifies 15 endangered and threatened species that could be found in the vicinity of the Project Site, which comprise four bird species (California condor, coastal California gnatcatcher, least Bell's vireo, and southwestern willow flycatcher), two amphibian species (arroyo toad and California red-legged frog), three fish and crustacean species (the unarmored threespine stickleback, Riverside fairy shrimp, and vernal pool fairy shrimp), and six flowering plant species (California Orcutt grass, Gambel's watercress, marsh sandwort, Nevin's barberry, slender-horned spineflower, and spreading navarretia).[5] The City of Santa Clarita's General Plan Conservation and Open Space Element specifically identifies critical habitat for the California gnatcatcher, red-legged frog, arroyo toad, and least Bell's vireo.[6] The nearest critical habitat is that of the arroyo toad, which extends along the Santa Clara River between Chiquito Canyon Road and San Francisquito Canyon, approximately 2.0 miles north of the Project Site.

Wetland habitats are protected by Section 404 of the federal Clean Water Act, which defines wetlands as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." The Project Site is located 0.6 miles west of the nearest wetland habitat.[7] As discussed in the Hydrology and Water Quality Section below, neither

4 City of Santa Clarita, *General Plan Land Use Element*, 2011.

5 US Fish and Wildlife Service, IPAC Information for Planning and Conservation, 2019.

6 City of Santa Clarita, General Plan Conservation and Open Space Element, 2011, Exhibit CO-4.

7 US Fish and Wildlife Service, *National Wetlands Inventory*, https://www.fws.gov/wetlands/data/mapper.html, accessed July 31, 2019.

Project-related construction nor operation would have an adverse effect on this habitat or any other wetland area.

Additionally, the City of Santa Clarita identifies Significant Ecological Areas (SEAs) on Exhibit CO-5 of the City's General Plan Conservation and Open Space Element; the nearest SEA is the Valley Oaks Savannah SEA, which is approximately 1.1 miles west of the Project Site.[8]

As discussed, the HMNH campus is in an urbanized area that supports a variety of institutional (medical and religious), residential, and office uses, as well as open space. The HMNH campus currently comprises 432,543 square feet of building area, including 223,958 square feet of hospital and related uses, 24,425 square feet of support facilities, and 184,160 square feet of medical offices. In addition, the new five-story IP-1Building was completed in October 2019, adding 153,457 square feet of building area to the HMNH campus (see **Figure 3-3**) for a total existing building area of 586,000 square feet. The Proposed Project would occur on two previously disturbed sites on the HMNH campus—an existing subterranean parking structure/surface lot (PS-4) and an existing surface parking lot (Lot D). These two sites were cleared of native vegetation long ago and currently do not provide habitat for threatened or endangered species or critical habitat for the California gnatcatcher, red-legged frog, arroyo toad, or least Bell's vireo.[9] There are also no drainage courses, water bodies, riparian habitats, or wetlands on or adjacent to the proposed footprints of the parking structure, the D&T Building, or IP-2 Building. Further, there are no oak trees on the Project Site that require preservation under the City of Santa Clarita's Oak Tree Preservation Ordinance or other trees on the Project Site that could act as part of a wildlife corridor.[10]

Because there is no terrestrial or aquatic habitat within the footprint of the Proposed Project, there would be no impact to protected species of plants or animals or to a wildlife corridor or designated critical habitats. Further, the Proposed Project does not conflict with a habitat conservation plan, a natural community conservation plan, or any other approved local, regional, or State conservation plan. As a result, no further analysis of these issues is required in this Draft SEIR.

7.4. Cultural Resources

Section 15064.5 of the CEQA Guidelines generally defines a historical resource as a resource that is: (1) listed in or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to PRC Section 5020.1(k)); or (3) identified as significant in a historical resources survey (meeting criteria in PRC Section 5024.1(g)).

In Santa Clarita, there are three historical resources that are listed in the California Register: Horseshoe Ranch, Pardee House, and Beale's Cut Stagecoach Pass.[11] None of these historical resources are within proximity and, thus, could be impacted by the Proposed Project. Additionally, the City of Santa Clarita's General Plan Conservation and Open Space Element identifies 32 cultural or historical sites; however, the closest one to the Project Site (22621 13th street) is 1.5 miles

[8] City of Santa Clarita, *General Plan Conservation and Open Space Element*, 2011, Exhibit CO-5.

[9] City of Santa Clarita, *General Plan Conservation and Open Space Element*, 2011, Exhibit CO-4.

[10] City of Santa Clarita, *Unified Development Code*, Section 17.51.040 (Oak Tree Preservation).

[11] California Office of Historic Preservation, *Listed California Historical Resources*, http://ohp.parks.ca.gov/ListedResources, accessed August 23, 2018.

away.[12] Given the distance between area historical sites and the Project Site, there would be no visible or physical impacts on historical or cultural sites resulting from the Proposed Project.

As discussed, the HMNH campus is in an urbanized area that supports a variety of institutional, residential, and office uses, as well as open space. The Proposed Project would occur within two previously disturbed sites on the HMNH campus—an existing subterranean parking structure/surface lot (PS-4) and an existing surface parking lot (Lot D). Given that the Project Site has been previously graded and developed, archaeological resources that may have existed at one time have likely been previously disturbed. The maximum depth of excavation for the development of the new D&T Building and IP-2 Building would be 15 to 25 feet below grade for the basement and foundations of the new buildings on Lots D and I and part of Lot H. There would be no excavation associated with the expansion of PS-4 as the expansion would be limited to the addition of aboveground floors onto an existing subterranean parking structure and surface lot. The total estimated volume of soil exported from the Project Site during excavation would be 21,000 cubic yards. There is a possibility that archaeological artifacts not previously discovered during past development may be present on the Project Site. If any archaeological resources are unexpectedly encountered during construction, work in the area would cease in compliance with Section 15064.5(c) of the CEQA Guidelines.

Finally, since the Project Site has been previously graded and developed, it is also unlikely that human remains would be found during grading and excavation for the Proposed Project. While not anticipated, if human remains are discovered during construction, such resources would be treated in accordance with State law, including Section 15064.5 of the CEQA Guidelines. If the remains are determined by the County coroner to be of Native American descent, the Native American Heritage Commission (NAHC) would be notified within 24 hours, and the guidelines of the NAHC would be followed in the treatment of the remains. As compliance with Section 15064.5(c) of the CEQA Guidelines and other State laws would ensure that any potentially unique archaeological resources encountered, or human remains discovered, during site grading and excavation would be appropriately treated, the Proposed Project's impact on archaeological resources and human remains would be less than significant. No further analysis of these issues is required in this Draft SEIR.

7.5. Geology and Soils

The Santa Clarita area contains and is within the vicinity of several known active and potentially active earthquake faults and fault zones. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years and potentially active faults are those demonstrating displacement within the last 1.6 million years. The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones, which extend from 200 to 500 feet on each side of the known fault, identifying areas where potential surface fault rupture could prove hazardous for buildings used for human occupancy. Based on the City of Santa Clarita's General Plan Safety Element, the Project Site is not within an Alquist-Priolo Earthquake Fault Zone (the nearest zone is approximately 1.8 miles away from the Project Site).[13]

[12] City of Santa Clarita, *General Plan Conservation and Open Space Element*, 2011, Exhibit CO-6.

[13] City of Santa Clarita, *General Plan Safety Element*, 2011, Exhibit S-1.

No faults are known to pass directly beneath the Project Site. The closest active faults include the San Gabriel Fault (approximately 1.8 miles to the northeast) and the Sierra Madre Fault (approximately 4 miles to the southeast). Given the distance to the Project Site, the potential for surface rupture at the Project Site would be minimal. The Project Site could experience seismic ground shaking if an earthquake event were to occur; however, the Project would be designed in accordance with the City, County, and State building code regulations governing the construction of buildings in California to withstand minor earthquakes without major damage.[14]

Regarding ground failure such as liquefaction and landslides, the Project Site is near earthquake fault and seismic hazard zones, identified by the California Division of Mines and Geology in its Earthquake Zones of Required Investigation Map for the Newhall Quadrangle.[15] This map, the data from which is displayed in Exhibit S-3 Seismic Hazards of the City's General Plan Safety Element, shows that the steep slope immediately northwest of the HMNH campus is susceptible to an earthquake-induced landslide.[16] In the unlikely event of an earthquake-induced landslide, the existing buildings to the northwest of the Project and an existing internal access road along the northwestern boundary of the HMNH campus would serve as barriers to landslide effects. Therefore, the Proposed Project would not exacerbate the risks of exposure of people or structures to earthquake-induced landslide.

Regarding soil erosion, the Proposed Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils. These disturbed soils could be exposed to wind and rain, thus potentially resulting in soil erosion. However, construction activities would comply with the City's erosion control requirements. The Proposed Project would also comply with the conditions of a Construction General Permit, pursuant to the Los Angeles County's National Pollutant Discharge Elimination System permit, which would reduce water erosion through requiring best management water quality control practices during construction (which would be detailed in the required Stormwater Pollution Prevention Plan completed before City approval of the grading plans). Further, the Proposed Project would also comply with SCAQMD Rule 403, which would reduce the potential for wind erosion. With compliance with regulatory requirements that require best management practices (BMPs), the impacts of soil erosion, either on- or off-site, would be less than significant.

The Project Site is a flat parcel that is not located on a cliff, hillside, bluff, or other geographic feature with stability concerns. As a result, the Proposed Project would not cause impacts related to unstable geologic units or soils or noticeable changes in topography, ground surface relief features, or any unique geological or physical feature. The Proposed Project would require site preparation, excavation, and grading prior to construction; however, since the existing site is already developed and flat, there would be no impacts to surface features or topography resulting from development or grading. Excavation, which would extend 15 to 25 feet below grade, would be required to accommodate construction of the basement levels and the foundations for the two new buildings. As there would be no landform changes occurring as a

[14] This includes California Building Code (2016) Part 2, Volume 2, Chapter 16, Structural Design, as well as Santa Clarita amendments to Chapter 16 of the California Building Code, detailed in Chapter 18.04 of Santa Clarita Building Code.

[15] California Geological Survey, *Earthquake Zones of Required Investigation Newhall Quadrangle*, 1998.

[16] City of Santa Clarita, *General Plan Safety Element*, 2011, Exhibit S-3.

result of the project, the Proposed Project would have a less-than-significant impact related to unstable soils.

The Project Site is underlain by alluvial soil, consisting of granular soils and deeper clays that have a high moisture content. As stated in the 2008 HMNH Master Plan EIR, these soils have low expansion potential.[17] Therefore, the Proposed Project would have no impact related to expansive soils. Finally, the Proposed Project is taking place on the HMNH campus and would be connected to the existing public sewer system. As a result, soil suitability for septic tanks is not applicable for this Proposed Project; therefore, the Proposed Project would have no impact, and no further analysis of this issue is required in this Draft SEIR.

Regarding paleontological resources, the City of Santa Clarita's General Plan EIR indicates that most of the paleontological resources in the Santa Clarita Valley are in the Santa Susana Mountains to the southwest and in the Sierra Pelona Mountains to the north, making it unlikely that any paleontological resources would be found at the Project Site.[18] The Project Site has been previously graded and developed; therefore, while paleontological resources would not likely be found on the Project Site, any resources that may have existed at one time have likely been previously disturbed. Further, excavation activities would not extend further than other recent projects occurring on the HMNH campus. For example, recent construction of IP-1 Building immediately adjacent to the Project Site did not unearth any previously unknown paleontological resources. Therefore, no new impacts would be associated with the Proposed Project other than those disclosed in the 2008 Master Plan EIR and no further analysis of this issue is required in this Draft SEIR.

7.6. Hazards and Hazardous Materials

Medical buildings on the HMNH campus use and store various amounts of hazardous materials, which are primarily found in medical offices, cleaning and sterilization areas, and pharmacies. These materials include chemotherapy reagents; pharmaceuticals; chemicals used to sterilize equipment; formaldehyde for specimen preservation; and solvents, oxidizers, corrosives, and stains used in clinical laboratories. Further, facilities maintenance requires various common hazardous materials, such as cleaners, paints, pesticides, herbicides, fuel (e.g., diesel), and oils and lubricants. Radioactive materials are utilized at the hospital, which are primarily used to treat different forms of cancer; however, X-ray equipment is also regulated as radioactive material. The Proposed Project, particularly the D&T Building and IP-2 Building, would likely use medical-related hazardous materials. As stated in the 2008 EIR, many of the hazardous materials that the HMNH uses and stores are kept in the hospital's Nursing Pavilion Central Plant.[19] A complete list of the materials used and stored is available in the 2008 EIR[20] in Appendix J "Henry Mayo Newhall Memorial Hospital Nursing Pavilion Central Plan Materials Storage List."

[17] City of Santa Clarita, *Henry Mayo Newhall Memorial Hospital Master Plan Environmental Impact Report*, 2008, Section 5.8 Geology, Soils, and Seismicity.

[18] City of Santa Clarita, *General Plan EIR*, 2011, Section 3.8 Cultural Resources, p. 3.8-2.

[19] City of Santa Clarita, *Henry Mayo Newhall Memorial Hospital Master Plan Environmental Impact Report*, 2008, Section 5.9 Hazards and Hazardous Waste.

[20] City of Santa Clarita, *Henry Mayo Newhall Memorial Hospital Master Plan Environmental Impact Report*, 2008, Appendix J: Henry Mayo Newhall Memorial Hospital Nursing Pavilion Central Plan Materials Storage List.

The majority of the hazardous waste generated at HMNH generally results from the use of solvents, waste oil, and mixed oils. These wastes are shipped to hazardous waste storage and treatment facilities off-site in accordance with California's Hazardous Waste and Hazardous Substances Law.[21] Regarding radioactive waste, the majority of radionuclides used to treat patients have half-lives of 52 days or less, so the hospital stores these on-site until their radioactivity decays to background levels, at which point they are disposed of as non-hazardous solid waste.[22] As a result of these disposal measures, the Proposed Project would not create a significant hazard to the public through the normal use of these materials or through a reasonably foreseeable upset or accident. Further, the materials used on-site would not release hazardous emissions that would significantly impact surrounding uses.

The Project Site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List).[23] The Project Site is listed on the State Water Resources Control Board's GeoTracker database as a leaking underground storage tank cleanup site; however, the cleanup has been completed. The database also shows that there is a permitted underground storage tank (UST) located on the Project Site; however, this UST is not located within the area of ground disturbance associated with proposed construction activities on Lot D and PS-4. The Project Site is not listed on other Cortese List resource databases, such as the Department of Toxic Substances Control EnviroStor database or on lists of hazardous waste facilities, solid waste disposal facilities, or a list of active Cease and Desist/Cleanup and Abatement Orders that do not concern discharge of wastes that are hazardous materials.[24]

The Project Site is not located within an airport use plan or within 2 miles of an airport. The nearest airport is the Whiteman Airport, which is approximately 16 miles away. Bob Hope Airport in Burbank and the Agua Dulce Airstrip are both approximately 20 miles from the Project Site.

The Proposed Project is within an already developed medical campus, which is surrounded by residential and institutional uses. Further, the HMNH campus is not within a Very High Fire Hazard Severity Zone as identified by California Department of Forestry and Fire Protection.[25] Therefore, the Proposed Project is not adjacent to wildlands and would not expose people or structures to significant risks of loss or death resulting from wildfires. Further, there are no overhead powerlines or oil pipelines near the proposed area of disturbance. In a response letter to the Notice of Preparation, the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) stated that its records indicate that one known oil well is within the Project area.[26] Per Figure 1 in the letter provided by DOGGR (**Appendix A**), the oil and gas well is located on the west side of MOB-F on the south side of the HMNH campus. The letter also notes uncertainty

[21] California Department of Toxic Substances Control, *2018 California Hazardous Waste and Hazardous Substances Law Code Excerpts*, 2018.

[22] City of Santa Clarita, *Henry Mayo Newhall Memorial Hospital Master Plan Environmental Impact Report*, 2008, Section 5.9 Hazards and Hazardous Waste.

[23] This determination was made after searching Cortese List databases, including State Water Resources Control Board identified sites and a search of the DTSC EnviroStor Database. Databases representing Cortese List Data Resources are identified by the California Environmental Protection Agency (CalEPA), available at https://calepa.ca.gov/sitecleanup/corteselist/, accessed February 22, 2019.

[24] California Environmental Protection Agency (CalEPA), *Cortese List Data Resources*, available at https://calepa.ca.gov/sitecleanup/corteselist/, accessed February 22, 2019.

[25] California Department of Forestry and Fire Protection, *Very High Fire Hazard Severity Zones, Santa Clarita*, 2011.

[26] California Department of Conservation, Division of Oil, Gas, and Geothermal Resources. Letter received in response to the Notice of Preparation (NOP), Appendix A of this Draft SEIR, September 7, 2018.

associated with the location of the oil and gas well, stating that well records place the well outside of the Project Site, on the south side of McBean Parkway. Both locations offered in the letter as possible locations of this oil and gas well are outside of the area of disturbance associated with the Proposed Project. As such, Project impacts related to hazards and hazardous materials would be less than significant. No further analysis of these issues is required in this Draft SEIR.

7.7. Hydrology and Water Quality

The Proposed Project would occur within the existing HMNH campus and in areas previously disturbed by development. Since the Project Site is already covered with impervious surfaces, new development would not substantially alter the stormwater drainage pattern of the site or the course of any stream or river, since there is no such water body on the HMNH campus. Further, as the extent of impervious surface coverage during operation of the Proposed Project would be similar to existing conditions, the Proposed Project is not expected to create or contribute runoff that would exceed the capacity of existing stormwater drainage systems.

The Proposed Project would be required to comply with the Los Angeles County MS4 permit during Project construction, which would reduce the potential for stormwater-driven erosion through requiring BMPs during earth-moving construction activities. During Project operation, stormwater pollutants generated at the Project Site would primarily be those associated with parking areas, such as vehicles fluids, oils, grease, and trash and debris. The HMNH campus does have a gravity separation device for catchment and filtration of contaminants and debris from stormwater that was developed as part of a 3,000-square-foot building used as a facility office by maintenance personnel. The rest of the stormwater system on the HMNH campus is designed to address trash and debris using screens and grates over storm drain inlets. . Further, any areas not covered with impervious surfaces would be covered with maintained landscaping, which would prevent soil erosion during Project operation. Given these measures, the development of the two new buildings and parking structure expansion within the HMNH campus would not substantially degrade water quality. With compliance with regulations that require BMPs, the potential impacts of stormwater runoff during construction and operation would be less than significant.

Regarding groundwater, the Proposed Project would not interfere with groundwater recharge of the alluvium aquifer since the Proposed Project would occur in areas within the HMNH campus already covered with impervious surfaces.[27] Further, as the Proposed Project occurring on Lot D would involve excavation 15 to 25 feet below grade, a depth that would not encroach into the groundwater table, groundwater flows would not be impacted. For more information on the impacts of the Proposed Project on groundwater, see Section 4.8, Utilities, of this Draft SEIR.

The Santa Clara River and its tributary streams play a major part in moving large volumes of runoff from the surrounding foothills and mountains through the Santa Clarita Valley.[28] While the Project Site is within the watershed of the Santa Clara River, there are no bodies of water within or flowing through the Project Site. The Santa Clara River runs approximately 1.8 miles to the north of the Project Site, with the south fork of the Santa Clara River running approximately 0.65 miles southeast of the Project Site. Given the distance between the Project Site and the Santa Clara River, the Proposed Project would not cause changes in rate of flow, currents, or the course of surface water,

[27] City of Santa Clarita, *General Plan Conservation and Open Space Element*, 2011, Exhibit CO-B.

[28] City of Santa Clarita, *General Plan Conservation and Open Space Element*, 2011.

and, thus, there would be no impacts of flooding, sedimentation, or erosion resulting from diverting the flow of a stream or river. The Project Site is not within the 100-year flood zone.[29] Therefore, the Proposed Project would not place any structure within such a hazard zone. The Project Site is not located within the Castaic Lake or Bouquet Reservoir dam inundation areas or prone to inundation by seiche, tsunami, or mudflow.[30] As a result, no further evaluation of these issues is required in this Draft SEIR.

7.8. Land Use and Planning

The Proposed Project would occur within the existing HMNH campus and in areas previously disturbed by development. The proposed construction of the three-story D&T Building and five-story IP-2 Building would be contained within the footprint of existing surface parking lots (Lots D and I and part of Lot H). The proposed addition of 292 new parking spaces would occur on the site of an existing subterranean parking structure/surface lot. These proposed medical uses and parking are consistent with other land uses on the HMNH campus. While the HMNH campus is surrounded by residential uses to the southeast, south, west, and north, the Proposed Project, which increases building density within an established hospital campus, would not disrupt or physically divide an established community. The Project Site is designated and zoned as Specific Plan (SP) following development of the Henry Mayo Newhall Hospital Specific Plan in 2016.[31] The Specific Plan outlines existing uses and contains development plans, infrastructure development plans, development regulations, design guidelines, and an implementation program for the HMNH campus. There would be no change in the maximum number of beds (i.e., 368 beds) permitted under the approved 2008 Master Plan. While the Proposed Project would move approximately 92 beds from the existing Main Hospital Building to the new IP-2 Building, the Proposed Project would result in 360 total hospital beds on the HMNH campus and is, therefore, consistent with the 2008 Master Plan.

The 2008 Master Plan established five different building height zones for the HMNH campus. The Project Site is located in Zone 3, which imposes a height limit of 35 feet. IP-2 Building with a height of 80 feet, the D&T Building with a height of 60 feet, and the addition of aboveground parking levels to PS-4 with a height of 40 feet would exceed this maximum building height. A provision within the amendments to the 2008 Master Plan and 2016 Specific Plan would extend Zone 5 (an 85-foot maximum height limit) to include Lots D and I and part of Lot H and would extend Zone 4 (a 45.5-foot maximum height limit) to include PS-4, as shown in **Figure 3-6** in Section 3.0, Project Description, of this Draft SEIR. The Proposed Project, which is an intensification of approved land uses, would otherwise be consistent with the current Specific Plan land use designation and City zoning. Finally, the Project Site does not support a natural community and is not within the boundaries of a habitat or community conservation plan. As a result, no further evaluation of these issues is required in this Draft SEIR.

7.9. Mineral Resources

Mining activities in California are regulated by the Surface Mining and Reclamation Act of 1975. The act designates Mineral Resource Zones (MRZ), which are classified according to the presence

[29] City of Santa Clarita, *General Plan Safety Element*, 2011, Exhibit S-4 Surface Water.

[30] City of Santa Clarita, *General Plan Safety Element*, 2011, Exhibit S-3.

[31] City of Santa Clarita, *General Plan Land Use Element*, 2011.

or absence of significant deposits. MRZ-2 areas are underlain by mineral deposits where geologic data indicate that significant resources may be present. The City of Santa Clarita's General Plan identified 19,000 acres of MRZ-2 area, which is an area of prime importance due to known mineral deposits. The General Plan Conservation and Open Space Element (Exhibit CO-2) shows that the Project Site is located within this MRZ-2 area.[32] However, no mineral extraction operations occur on the Project Site, and the Project Site is located within an urbanized area on a previously disturbed portion of the HMNH campus. Therefore, the Proposed Project would not result in the loss of availability of a known valuable mineral resource or a locally important mineral resource identified in a local general plan, specific plan, or land use plan, and, as such, no further analysis of this issue is required in this Draft SEIR.

7.10. Noise

The Proposed Project would occur within the HMNH campus in the City of Santa Clarita. Due to its location, it is not located within the vicinity of a private airstrip, an airport land use plan, or within 2 miles of a public airport or public use airport. The nearest airport is Whiteman Airport, which is approximately 16 miles away. In addition, the Proposed Project would not include a new helipad and would not directly increase helicopter traffic in the Project vicinity. Accordingly, no changes to the use of the emergency helipad at the HMNH campus and the corresponding noise associated with its use would result from implementation of the Proposed Project. Therefore, no further evaluation on the exposure of people residing or working in the Project area to excessive noise levels due to Project activities is necessary in this Draft SEIR.

7.11. Population and Housing

Project implementation would involve an intensification of land uses within previously disturbed areas on the HMNH campus. This would include construction of the new D&T Building and IP-2 Building on the site of existing surface parking lots (Lots D and I and part of Lot H), as well as expanding an existing subterranean parking structure/surface lot (PS-4) by 292 spaces through the addition of three aboveground levels. As the Proposed Project would be located within the existing HMNH campus, the Proposed Project would not remove any residential housing units from the market or displace any people, requiring construction of replacement housing elsewhere.

The proposed D&T Building and IP-2 Building would accommodate uses that are primarily already operating within the existing Main Hospital Building and MOB-1. Accordingly, the existing uses to be accommodated by the Project would not generate a substantial increase in the number of employees on-site. However, the building floor area within the existing Main Hospital Building (approximately 138,000 square feet) would be backfilled with new hospital uses, including MRI space and procedure rooms and administrative office space (some of which would be shifted from the existing MOB-1). Therefore, the employee estimate is based on the backfilling of the building floor area within the existing Main Hospital Building. Based on Institute of Traffic Engineers (ITE) assumptions, it is estimated the Proposed Project would add 371 employees, which would not induce substantial population growth in the vicinity.[33] The Southern California Association of Governments' 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) forecasts that total employment in Santa Clarita will increase from 83,700 in 2020 to

[32] City of Santa Clarita, *General Plan Conservation and Open Space Element*, 2011.

[33] ITE assumes 372 square feet per employee for hospital land uses.

91,300 in 2035 and 95,900 by 2040.[34] The employment growth associated with the Proposed Project would account for approximately 5 percent of the employment growth between 2020 and 2035 and would account for 3 percent of employment growth between 2020 and 2040. As a result, direct employment growth associated with the Proposed Project would be less than significant. The California Department of Finance indicates that as of January 2018, the City of Santa Clarita has a total of 74,294 housing units with a 4.2 percent vacancy rate.[35] Further, some of these new employees could relocate to the Santa Clarita Valley as well. Therefore, the current housing supply in Santa Clarita and surrounding areas would be sufficient to accommodate these new employees, and no additional housing would be required. No further analysis of this issue is required in this Draft SEIR.

7.12. Public Services

7.12.1. FIRE PROTECTION SERVICES

Fire suppression and emergency medical response services for the Project Site and the surrounding area are provided by the Los Angeles County Fire Department (LACoFD). Specifically, 16 fire stations with 15 engine companies, 5 paramedic squads, 1 hazardous materials squad, and 2 ladder trucks serve the Santa Clarita Valley. The nearest fire station to the Project Site is LACoFD Station 126, at 26320 Citrus Street, approximately 1.2 miles north of the Project Site. The next closest fire station is LACoFD Station 73, located at 24875 North Railroad Avenue, which is approximately 1.3 miles southeast of the Project Site. Both stations provide emergency medical services (EMS), fire and rescue services, and safe haven services in unincorporated Los Angeles County and for contract cities, including Santa Clarita.[36] In a response letter to the Notice of Preparation (**Appendix A** of this Draft SEIR), the LACoFD Land Development Unit listed a number of code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants, which are to be incorporated into plans submitted for plan check and building permits.[37] The Proposed Project would be required to comply with all LACoFD standards prior to the issuance of City of Santa Clarita building permits and certificates of occupancy; therefore, the Project would not have a significant impact on fire protection services, and no further analysis of this issue is required in this Draft SEIR.

7.12.2. POLICE PROTECTION SERVICES

Police protection services in Santa Clarita are provided by the Los Angeles County Sheriff's Department (LASD). Although the HMNH has its own provision of private security within the campus itself, the Proposed Project would be served by the LASD Santa Clarita Valley Station at 23740 Magic Mountain Parkway, approximately 1.2 miles north of the Project Site. The Santa Clarita Municipal Code includes a law enforcement facilities fee, which is a mitigation fee imposed on new residential, commercial, office, and industrial development, which helps provide law

[34] Southern California Association of Governments, *2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction*, 2016.

[35] California Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2018*, May 2018.

[36] Los Angeles County Fire Department, *Fire Station Locator*, https://locator.lacounty.gov/fire, accessed September 28, 2018.

[37] Letter from Los Angeles County Fire Department in response to Notice of Preparation, from Michael Takeshita, Acting Chief, Forestry Division, Preventative Services Bureau, dated September 21, 2018.

enforcement services for the new development.[38] The LASD also recommended implementation of a construction mitigation plan and a construction traffic management plan to address construction-related traffic and emergency access issues. These traffic-related recommendations are addressed in Section 4.6, Transportation and Parking, of this Draft SEIR. As the Proposed Project would not create any unique or extensive crime problems, and given the feedback from LASD, the Proposed Project would not have a significant impact on police protection services, no further analysis of this issue is required in this Draft SEIR.

7.12.3. SCHOOLS

The Proposed Project would not develop any new residential dwellings and, thus, would not directly increase the population of school-aged children served by the area schools. Therefore, the Proposed Project would not impact school services, and no further analysis of this issue is required in this Draft SEIR.

7.12.4. PARKS

The effects of the Proposed Project on park facilities are discussed in Section 7.13, Recreation, below.

7.13. Recreation

The Proposed Project would enhance the existing services of the HMNH campus and continue to serve the City of Santa Clarita and surrounding communities. The Proposed Project is not expected to induce substantial population growth or otherwise directly or indirectly increase the use of public parks. As such, the Project would not lead to physical deterioration of any existing recreational facilities. Further, the Project does not include residential units that would require park development fees or new recreational facilities. Therefore, the Project would not have an adverse physical effect on the environment from the construction or expansion of recreational facilities, and no further analysis of this issue is required in this Draft SEIR.

7.14. Utilities

The Proposed Project would be constructed within the already developed HMNH campus. The existing off-site telecommunications infrastructure serving the Project Site would be sufficient to meet Project demands and would not have to be relocated or expanded to accommodate the Proposed Project. The Project would not have a significant impact on telecommunication utilities, and no further analysis of this issue is required in this Draft SEIR.

[38] City of Santa Clarita, *Santa Clarita Municipal Code*, Section 17.51.01(B), Law Enforcement Facilities Fee.

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