



MITIGATED NEGATIVE DECLARATION

GenevaCho Neurological Medical Center

Case Number: ENV-2020-4012-MND

Project Location: 3160 West Geneva Street

Community Plan Area: Wilshire

Council District: 13 – Mitch O’Farrell

Project Description: The project involves the renovation and expansion of an existing vacant hospital building to include a new outpatient medical clinic and medical office uses, and 40 Senior Independent Living units (two units reserved for Extremely Low Income seniors and three units reserved for Very Low Income seniors). Medical uses would consist of approximately 141,164 square feet of floor area to be located within existing buildings. The Senior Independent Living units will occupy a new 30,000 square-foot third floor addition above the second floor of the existing hospital building. A total of 153 automobile parking spaces will be provided within an existing garage. The project will also provide 39 bicycle parking spaces.

The Applicant is requesting the following discretionary approvals: (1) Pursuant to LAMC Section 12.32 E, a General Plan Amendment from Low II Residential and High Medium Residential to Community Commercial; (2) Pursuant to LAMC Section 12.32 F, a Zone Change from R1-1 to C2-2D; (3) Pursuant to LAMC Section 11.5.11(e) and California Government Code 65915(k), in exchange for the provision of on-site Restricted Affordable Units (pursuant to LAMC Section 11.5.11(a)-1(ii) no less than 5% of the total units at rents affordable to Extremely Low Income households, and either 6% of the total units at rents affordable to Very Low Income households or 15% of the total units at rents affordable to Lower Income households), two Developer Incentives to permit: (a) a parking reduction to provide 153 spaces in lieu of 324 spaces otherwise required ; (b) a waiver of transitional height requirements to permit a building height of 78 feet in lieu of transitional height requirements per LAMC Section 12.21-A (4) Pursuant to LAMC Section 16.05, a Site Plan Review for any change of use other than to a drive-through fast food establishment which results in a net increase of 1,000 or more average daily trips. Pursuant to various sections of the LAMC, the Applicant requests various ministerial administrative approvals and permits from the Los Angeles Department of Building and Safety and other municipal agencies for project construction actions, including but not limited to the following: haul route, street tree removal, demolition, grading, foundation, building and tenant improvements.

PREPARED BY:

The City of Los Angeles
Department of City Planning

APPLICANT:

Dr. Kyung Cho
GenevaCho, LLC.

INITIAL STUDY

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INITIAL STUDY

1 INTRODUCTION

This Initial Study (IS) document evaluates potential environmental effects resulting from construction and operation of the proposed Geneva Medical (“Project”). The Proposed Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City of Los Angeles (City). Based on the analysis provided within this Initial Study, the City has concluded that the Project will not result in significant impacts on the environment. This Initial Study and Mitigated Negative Declaration are intended as informational documents, and are ultimately required to be adopted by the decision maker prior to project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of Proposed Projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project’s approval even if significant environmental effects are anticipated.

An application for the Proposed Project has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the project is subject to CEQA, and the preparation of an Initial Study is required.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006).

1.2. ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into four sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study, and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

1.3. CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

At the onset of the environmental review process, the City has prepared an Initial Study to identify the preliminary environmental impacts of the project. The Initial Study for the Project determined that the Proposed Project would not have significant environmental impacts that would require further study.

If the Project is approved, then within five days of the action, the City files a Notice of Determination with the County Clerk. The Notice of Determination is posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the project, and to issues that were presented to the Lead Agency by any person, either orally or in writing, during the public comment period.

1.3.1 Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Proposed Project may have a significant effect on the environment. This Initial Study determined that the Proposed Project could have potentially significant environmental impacts but mitigation measures agreed to by the applicant would avoid or reduce such impacts to a point where clearly no significant impacts would occur.

A Notice of Intent to Adopt a Mitigated Negative Declaration (MND) or Negative Declaration (ND) is provided to inform the general public, responsible agencies, trustee agencies, and the county clerk of the availability of the document and the locations where the document can be reviewed. A 20-day review period (or 30-day review period when the document is submitted to the State Clearinghouse for state agency review) is identified to allow the public and agencies to review the document. The notice is mailed to any interested parties and is noticed to the public through publication in a newspaper of general circulation.

The decision-making body then considers the Mitigated Negative Declaration or Negative Declaration, together with any comments received during the public review process, and may adopt the MND or ND and approve the project. In addition, when approving a project for which an MND or ND has been prepared, the decision-making body must find that there is no substantial evidence that the project will have a significant effect on the environment, and that the ND or MND reflects the lead agency's independent judgement and analysis. When adopting an MND, the lead agency must also adopt a mitigation monitoring program to ensure that all proposed mitigation measures are implemented to mitigate or avoid significant environmental effects.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	Geneva Medical
ENVIRONMENTAL CASE NO.	ENV-2020-4012-MND
RELATED CASES	CPC-2020-4011-GPA-ZCJ-SPR

PROJECT LOCATION	3160 West Geneva Street
COMMUNITY PLAN AREA	Wilshire
EXISTING GENERAL PLAN DESIGNATION	Low II Residential and High Medium Residential
PROPOSED GENERAL PLAN DESIGNATION	Community Commercial
EXISTING ZONING	R1-1-O
PROPOSED ZONING	(T)(Q)C2-2D
COUNCIL DISTRICT	13

LEAD CITY AGENCY	City of Los Angeles Department of City Planning
STAFF CONTACT	Renata Ooms
ADDRESS	200 North Spring Street, Room 763 Los Angeles, CA 90012
PHONE NUMBER	(213) 978-1222
EMAIL	Renata.Ooms@lacity.org

APPLICANT	Dr. Kyung Cho, GenevaCho, LLC
ADDRESS	3700 Wilshire Boulevard
PHONE NUMBER	213-388-6168 (APPLICANT) 213-706-7475 (REPRESENTATIVE: Mee Semcken, Lee Consulting Group, LLC)

PROJECT DESCRIPTION

The project involves interior renovations and a 30,000 square-foot addition to the former Shriner's Children's Hospital building, resulting in a 78-foot in height, 171,060 square-foot development. The project would consist of approximately 141,000 square feet of outpatient medical clinic and medical office uses and approximately 30,000 square feet of residential uses consisting of 40 Senior Independent Living Units. The project will reserve five units (two Extremely Low Income and three Very Low Income) as affordable units for seniors. The project will maintain the existing main entrance on Geneva Street and driveway on 4th Street. Parking will continue to be provided in an existing garage with 153 vehicle parking spaces and 39 bicycle parking spaces (21 long term and 18 short term spaces).

The requested entitlements include, pursuant to LAMC Section 12.32-C, a General Plan Amendment from Low II Residential and High Medium Residential to Community Commercial; pursuant to LAMC Section 12.32-F, a Zone Change from R1-1 to C2-2, and pursuant to LAMC Section 16.05, Site Plan Review for any change of use other than to a drive-through fast food establishment which results in a net increase of 1,000 or more average daily trips; and any additional actions including but not limited to, tree removal, demolition, grading, excavation, haul route, and building permits. Removal of street trees are subject to the review and approval by the Board of Public Works, Urban Forestry Division.

(For additional detail, see "Section 3. PROJECT DESCRIPTION").

ENVIRONMENTAL SETTING

The subject property occupies an entire city block on a gently sloping, irregular-shaped, 97,806 (2.24 acres) square-foot lot with a frontage of approximately 330 feet on the south side of Geneva Street, 300 feet on the west side of Commonwealth Avenue, 330 feet on the north side of West 4th Street, and 300 feet on the east side of Virgil Avenue. The site is developed with the former Shriners' Children's Hospital complex.

The site is located within the Wilshire Community Plan with a General Plan Land Use Designation of Low II Residential and High Medium Residential. The subject site is zoned R1-1. The site is further located within the Los Angeles State Enterprise Zone (ZI-2374), Construction Site review: Department of Conservation, Division, of Oil Conservation Division of Oil, Gas, and Geothermal Resources (ZI-1195), ZI-2452 Transit Priority Area in the City of Los Angeles, a TOC Tier 3 area, an Urban Agriculture Incentive Zone, a Methane Zone, and is within 0.92 kilometers of the nearest known fault (Puente Hills Blind Thrust). The site is not located within an Alquist-Priolo Fault Zone, Airport Hazard Area, High Fire Hazard Severity Zone, Flood Zone, Landslide area, Liquefaction Zone, Tsunami Inundation Zone, Special Grading Area (BOE), or Hazardous Waste / Border Zone area.

Surrounding uses include a mix of multi-family and single-family development. The northern adjoining properties (across Geneva Street) are zoned R4-2 and are developed with multi-family residential developments. The eastern adjoining properties (across Commonwealth Avenue) are zoned R4-2 and are developed with multi-family developments. The southern adjoining properties (across 4th Street) are zoned CR-1 and R4-2 and are developed with multi-family residential

developments. The western adjoining properties (across Virgil Avenue) are zoned R1-1 and are developed with single-family and multi-family developments.

(For additional detail, see “Section 3. PROJECT DESCRIPTION”).

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g. permits, financing approval, or participation agreement)

None.

CALIFORNIA NATIVE AMERICAN CONSULTATION

Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. As specified in AB52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a Proposed Project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

In compliance with AB 52, the City provided notice to tribes soliciting requests for consultation on February 24, 2021. On March 3, 2021, the Gabrieleno Band of Mission Indians – Kizh Nation requested to engage in tribal consultation. Planning staff noted that no ground disturbance activities are anticipated from the project and the tribe withdrew their request to consult. On March 26, 2021, the consultation period concluded.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

Renata Ooms

PRINTED NAME



SIGNATURE

City Planner

TITLE

10/12/2021

DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

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

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The project involves interior renovations and a 30,000 square-foot addition to the former Shriner's Children's Hospital building, resulting in a 78-foot in height, 171,060 square-foot development. The project would consist of approximately 141,000 square feet of outpatient medical clinic and medical office uses and approximately 30,000 square feet of residential uses consisting of 40 Senior Independent Living Units. The project will reserve five units (two Extremely Low Income and three Very Low Income) as affordable units for seniors. The project will maintain the existing main entrance on Geneva Street and driveway on 4th Street. Parking will continue to be provided in an existing garage with 153 vehicle parking spaces and 39 bicycle parking spaces (21 long term and 18 short term spaces).

The requested entitlements include, pursuant to LAMC Section 12.32-C, a General Plan Amendment from Low II Residential and High Medium Residential to Community Commercial; pursuant to LAMC Section 12.32-F, a Zone Change from R1-1 to C2-2, and pursuant to LAMC Section 16.05, Site Plan Review for any change of use other than to a drive-through fast food establishment which results in a net increase of 1,000 or more average daily trips ; and any additional actions including but not limited to, tree removal, demolition, grading, excavation, haul route, and building permits. Removal of street trees are subject to the review and approval by the Board of Public Works, Urban Forestry Division.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location and Existing Conditions

The subject property occupies an entire city block on a gently sloping, irregular-shaped, 97,806 (2.24 acres) square-foot lot with a frontage of approximately 330 feet on the south side of Geneva Street, 300 feet on the west side of Commonwealth Avenue, 330 feet on the north side of West 4th Street, and 300 feet on the east side of Virgil Avenue. The site is developed with the Shriners' Children's Hospital complex.

The site is located within the Wilshire Community Plan with a General Plan Land Use Designation of Low II Residential and High Medium Residential. The subject site is zoned R1-1. The site is further located within the Los Angeles State Enterprise Zone (ZI-2374), Construction Site review: Department of Conservation, Division, of Oil Conservation Division of Oil, Gas, and Geothermal Resources (ZI-1195), ZI-2452 Transit Priority Area in the City of Los Angeles, a TOC Tier 3 area, an Urban Agriculture Incentive Zone, a Methane Zone, and is within 0.92 Kilometers of the nearest known fault (Puente Hills Blind Thrust). The site is not located within an Alquist-Priolo Fault Zone, Airport Hazard Area,

High Fire Hazard Severity Zone, Flood Zone, Landslide area, Liquefaction Zone, Tsunami Inundation Zone, Special Grading Area (BOE), or Hazardous Waste / Border Zone area.

3.2.2 Surrounding Land Uses

Surrounding uses include a mix of multi-family and single-family development. The northern adjoining properties (across Geneva Street) are zoned R4-2 and are developed with multi-family residential developments. The eastern adjoining properties (across Commonwealth Avenue) are zoned R4-2 and are developed with multi-family developments. The southern adjoining properties (across 4th Street) are zoned CR-1 and R4-2 and are developed with multi-family residential developments. The western adjoining properties (across Virgil Avenue) are zoned R1-1 and are developed with single-family and multi-family developments.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The project involves interior renovations and a 30,000 square-foot addition to the former Shriner's Children's Hospital building, resulting in a 78-foot in height, 171,060 square-foot development. The project would consist of approximately 141,000 square feet of outpatient medical clinic and medical office uses and approximately 30,000 square feet of residential uses consisting of 40 Senior Independent Living Units. The project will reserve five units (two Extremely Low Income and three Very Low Income) as affordable units for seniors. The project will maintain the existing main entrance on Geneva Street and driveway on 4th Street. Parking will continue to be provided in an existing garage with 153 vehicle parking spaces and 39 bicycle parking spaces (21 long term and 18 short term spaces).

REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Mitigated Negative Declaration will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to L.A.M.C. Section 12.32-C, a JJJ General Plan Amendment from Low II Residential and High Medium Residential to Community Commercial.
- Pursuant to L.A.M.C. Section 12.32-F, a JJJ Zone Change from R1-1 to C2-2
 - The following developer incentives:
 - Parking reductions to permit 153 spaces in lieu of 324 spaces
 - A waiver of transitional height requirements to permit a 78-foot height in lieu of 33 feet
- Pursuant to L.A.M.C. Section 16.05, a Site Plan Review for any change of use other than to a drive-through fast food establishment which results in a net increase of 1,000 or more average daily trips.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, haul route, street tree removal, foundation permits, building permits, and sign permits.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” 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.” PRC Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”¹

PRC Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts. The analysis in this initial study (or in the EIR, if any aesthetic impact discussion is included), is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this initial study (or the EIR) is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this initial study (or the EIR) shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

¹ City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>. Accessed Dec. 2, 2016.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Except as provided in Public Resources Code

Section 21099 would the project:

- a. Have a substantial adverse effect on a scenic vista?
- b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
- d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

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

No Impact.

A significant impact would occur if the Proposed Project would have a substantial adverse effect on a scenic vista. A scenic vista refers to views of focal points or panoramic views of broader geographic areas that have visual interest. A focal point view would consist of a view of a notable object, building, or setting. Diminishment of a scenic vista would occur if the bulk or design of a building or development contrasts enough with a visually interesting view, so that the quality of the view is permanently affected. The Project would repurpose a vacant hospital building with new medical offices and 40 senior independent living residences. The existing visual character of the surrounding locale is highly urban and the Project Site is not located within or along a designated scenic highway, corridor, or parkway. No designated scenic vistas in the local area would be impeded, and the project will not substantially block any scenic vistas.

Additionally, the Project Site is designated as a transit priority area per the Department of City Planning's Zoning Information File ZI No. 2452, *Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA*. As a result, this state law supersedes the

aesthetic impact thresholds of significance that were previously adopted in the State CEQA Guidelines. Accordingly, the Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. While Section 21099 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers. Therefore, there will be no impact on aesthetics and no impact on a scenic vista. No mitigation is required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

No Impact. A significant impact would occur if the Proposed Project would substantially damage scenic resources within a State Scenic Highway. The City of Los Angeles General Plan Transportation Element (Map E: Scenic Highways in the City of Los Angeles) indicates that no City-designated scenic highways are located near the Project Site.

Additionally, the Project Site is designated as a transit priority area per the Department of City Planning's Zoning Information File ZI No. 2452, *Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA*. As a result, this state law supersedes the aesthetic impact thresholds of significance that were previously adopted in the State CEQA Guidelines. Accordingly, the Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. While Section 21099 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers. Therefore, no impact on aesthetics and no impacts on related to scenic highways would occur and no mitigation is required.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. The project is in an urbanized, developed area. A significant impact would occur if the Proposed Project would conflict with applicable zoning and other regulations governing scenic quality. The project is compatible with the Community Plan and the Urban Design Guidelines. There are no additional regulations governing scenic quality that apply to the subject site. Additionally the Proposed Project will not change the visual character of its surroundings. Surrounding properties are developed with one to four-story single-and multi-family residential developments.

Additionally, the Project Site is designated as a transit priority area per the Department of City Planning's Zoning Information File ZI No. 2452, *Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA*. As a result, this state law supersedes the aesthetic impact thresholds of significance that were previously adopted in the State CEQA

Guidelines. Accordingly, the Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. While Section 21099 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers. Therefore, no impact on aesthetics will occur and no mitigation is required.

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

No Impact. A significant impact would occur if light and glare substantially altered the character of off-site areas surrounding the site or interfered with the performance of an off-site activity. Light impacts are typically associated with the use of artificial light during the evening and night-time hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior facades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions. The Project would repurpose a vacant hospital building with new medical offices and 40 senior independent living residences. Due to the urbanized nature of the area, a moderate level of ambient nighttime light already exists. Nighttime lighting sources include street lights, vehicle headlights, and interior and exterior building illumination. The Proposed Project does not include any elements or features that would create substantial new sources of glare.

Additionally, the Project Site is designated as a transit priority area per the Department of City Planning's Zoning Information File ZI No. 2452, *Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA*. As a result, this state law supersedes the aesthetic impact thresholds of significance that were previously adopted in the State CEQA Guidelines. Accordingly, the Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. While Section 21099 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers. Therefore, no impact on aesthetics and no impact on light and glare would occur and no mitigation is required.

II. AGRICULTURE AND FORESTRY RESOURCES

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

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?
- d. Result in the loss of forest land or conversion of forest land to non-forest use?
- e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

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

No Impact. The Project Site is located within a developed and urbanized area of the City. No farmland or agricultural activity exists on or near the Project Site. No portion of the Project Site is designated as Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. As such, no impacts would occur, and no mitigation is required.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is located within the jurisdiction of the City of Los Angeles and is subject to the applicable land use and zoning requirements of the L.A.M.C. The Project Site has a land use designation of Low II Residential and High Medium Residential and is currently zoned R1-1. The Project is requesting a General Plan Amendment to Community Commercial and a Zone Change to C2-2. As such, the Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site. As such, no impacts would occur, and no mitigation is required.

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

No Impact. As mentioned previously, the Project Site has a land use designation of Low II Residential and High Medium Residential uses and is zoned for single-family residential uses. The Project is requesting a General Plan Amendment to Community Commercial and a Zone Change to C2-2. As such, the Project Site is not zoned as forest land or timberland, and there is no timberland production at the Project Site. As such, no impacts would occur, and no mitigation is required.

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

No Impact. The Project Site is not designated or zoned for forest or timberland or used for forestry. Additionally, the Project Site is located in an urbanized area of the City and is not within any forestland area. As such, no impacts would occur, and no mitigation is required.

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

No Impact. Neither the Project Site nor nearby properties are currently utilized for agricultural or forestry uses. The Project Site is not classified in any "Farmland" category designated by the State of California. As such, no impacts would occur, and no mitigation is required.

III. AIR QUALITY

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

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- a. Conflict with or obstruct implementation of the applicable air quality plan?
- b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
- c. Expose sensitive receptors to substantial pollutant concentrations?
- d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

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

Less than Significant. The South Coast Air Quality Management District (SCAQMD) is the agency primarily responsible for comprehensive air pollution control in the South Coast Air Basin and reducing emissions from area and point stationary, mobile, and indirect sources. SCAQMD prepared the 2012 Air Quality Management Plan (AQMP) to meet federal and state ambient air quality standards. A significant air quality impact may occur if a project is inconsistent with the AQMP or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The Proposed Project is not expected to conflict with or obstruct the implementation of the AQMP and SCAQMD rules. According to the Air Quality and Noise Impact Assessment conducted by Yorke Engineering dated October 7, 2021 and utilizing the California Emissions Estimator Model (CalEEMod), the project does not reach the established thresholds of potential significance for air quality per the SCAQMD. Therefore, impacts would be less than significant and no mitigation is required.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard?

Less than Significant. A significant impact would occur if the Proposed Project would violate any air quality standard or contribute substantially to an existing or projected air quality violation. Project construction and operation emissions are estimated using California Emissions Estimator Model (CalEEMod), a statewide land use emissions computer model designed to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from land use projects. According to the CalEEMod model results as summarized in the Air Quality and Noise Impact Assessment conducted by Yorke Engineering LLC dated October 7, 2021 overall construction (maximum daily emission) for the Proposed Project would not exceed the SCAQMD thresholds for the criteria pollutants Reactive Organic Compounds (ROG), Nitrogen Oxides (NOx), Carbon Monoxide (CO), Sulfur Dioxide (SO2), and Respirable Particulate Matter (PM10 and PM2.5). The primary source of operation phase emissions are on-road vehicles traveling to and from the site and standard medical office building operational activities such as landscape equipment, energy use, and water use. The project output is also below the significance thresholds for the above referenced criteria pollutants with regard to overall operational emissions. Therefore, the Proposed Project would result in a less-than-significant impact related to regional operational emissions and no mitigation is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant. A significant impact would occur if the Proposed Project were to expose sensitive receptors to pollutant concentrations. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities. The Project Site is surrounded by single-family and multifamily residential uses. No ground disturbance activities are anticipated from the project, which will greatly reduce potential air pollution and dust impacts. Nevertheless, the project is subject to grading and construction standards to mitigate air pollution and dust impacts. Additionally, the project is not expected to contribute to pollutant concentrations or expose surrounding residences and other sensitive receptors to substantial pollutant concentrations. The project is required to meet SCAQMD District Rule 403 as well as the City's requirements for demolition, grading, and construction related to air pollution. Therefore, construction and operation of the project would result in a less than significant impact for both localized and regional air pollution emissions and no mitigation is required.

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

Less than Significant. Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project Site. The Proposed Project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Construction of the proposed project would not cause an odor nuisance. According to the SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The proposed medical office, clinic, and senior independent living facility use would not result in activities that create objectionable odors. Therefore, the Proposed Project would result in a less than significant impact related to objectionable odors and no mitigation is required.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?
- c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

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

No Impact. The proposed project is within a highly urbanized area that does not contain any biological resources or habitat area. The site is zoned R1-1 and the General Plan Land Use Designation is Low II Residential and High Medium Residential. The site is improved with a 141,000 square-foot vacant hospital building. The project would redevelop the site with a 170,000 square-foot medical clinic with 40 senior independent living units. Development of the Project Site will not have an adverse effect either directly or through habitat modifications; on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service, and no impacts would occur. No mitigation is required.

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

No Impact. A significant impact would occur if any riparian habitat or natural community would be lost or destroyed as a result of urban development. The Project Site does not contain any riparian habitat and does not contain any streams or water courses necessary to support riparian habitat. Therefore, the Proposed Project would not have any effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or the United States Fish and Wildlife Services, and no impacts would occur and no mitigation is required.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. A Significant impact would occur if federally protect wetlands would be modified or removed by a project. The Project Site does not contain any federally protected wetlands, wetland resources, or other waters of the United States as defined by Section 404 of the Clean Water Act. The Project Site is located in a highly urbanized area and developed with an approximately 141,000 square-foot vacant hospital building. Therefore, the Proposed Project would not have any effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means, and no impacts would occur and no mitigation is required.

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

No Impact. A significant impact would occur if the Proposed Project would interfere with, or remove access to, a migratory wildlife corridor or impede use of native wildlife nursery sites. Due to the highly urbanized nature of the Project Site and surrounding area, the Project Site does not

support habitat for native resident or migratory species or contain native nurseries. Therefore, the Proposed Project would not interfere with wildlife movement or impede the use of native wildlife nursery sites, and no impact would occur and no mitigation is required.

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

No Impact. A significant impact would occur if the Proposed Project would be inconsistent with local regulations pertaining to biological resources. The Proposed Project would not conflict with any policies or ordinances protecting biological resources, such as the City of Los Angeles Protected Tree Ordinance (No. 177,404). The Project Site does not contain locally-protected biological resources, such as oak trees, Southern California black walnut, western sycamore, and California bay trees. The Proposed Project would be required to comply with the provisions of the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFG). Both the MBTA and CFG protects migratory birds that may use trees on or adjacent to the Project Site for nesting, and may be disturbed during construction of the Proposed Project. Therefore, the Proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands), and no impacts would occur and no mitigation is required.

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

No Impact. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, the Proposed Project would not conflict with the provisions of any adopted conservation plan, and no impacts would occur and no mitigation is required.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?
- b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?
- c. Disturb any human remains, including those interred outside of dedicated cemeteries?

a) Cause a substantial adverse change in the significance of a historical resource as pursuant to State CEQA Guidelines §15064.5?

Less than Significant Impact. A significant impact would occur if the Proposed Project would substantially alter the environmental context of, or remove identified historical resources. The proposed project is the interior renovation and change of use of a vacant hospital building into a memory care outpatient medical clinic, medical offices, and 40 senior independent living residences. The vacant hospital building was originally constructed in 1951. None of the structures on site have been identified as a historic resource by local or state agencies, and the Project Site has not been determined to be eligible for listing in the National Register of Historic Places, California Register of Historical Resources, and the Los Angeles Historic-Cultural Monuments Register. In addition, the site was found to not retain sufficient integrity for listing in the National Register based on data available on the City's HistoricPlacesLA website (the City's new online information and management system created to inventory Los Angeles' significant historic resources). Therefore, impacts will be less than significant and no mitigation is required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Less than Significant Impact. A significant impact would occur if a known or unknown archaeological resource was removed, altered, or destroyed as a result of the Proposed Project. Section 15064.5 of the State CEQA guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, or resources that constitute unique archaeological resources. The applicant shall abide by current law if archaeological resources are discovered during grading or construction. Therefore, impacts will be less than significant and no mitigation is required.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. A significant impact would occur if previously interred human remains would be disturbed during excavation activities associated with project construction. No human remains are expected to be located on the Project Site; however, the applicant shall abide by current law if human remains are discovered during grading or construction. Therefore, impacts will be less than significant and no mitigation is required.

VI. ENERGY

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

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

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

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

Less Than Significant Impact. The Proposed Project would be subject to the City's Green Building Program Ordinance (Ord. No. 179,890), which was adopted to reduce the use of natural resources, create healthier living environments, and minimize the negative impacts of development on local, regional and global ecosystems. In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), the Project shall comply with all applicable mandatory provisions of the 2013 Los Angeles Green Code and as it may be subsequently amended or modified. Therefore, the impacts would be less than significant and no mitigation is required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The project involves interior renovations and a 30,000 square-foot addition to an existing 141,000 square-foot vacant hospital building. As stated above, the project's improvements and operations would be in accordance with applicable State Building Code Title 24 regulations and City of Los Angeles Green Building Code, which impose energy conservation measures. As such, impacts of the project would be less than significant, and no mitigation is required.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
 - ii. Strong seismic ground shaking?
 - iii. Seismic-related ground failure, including liquefaction?
 - iv. Landslides?
- b. Result in substantial soil erosion or the loss of topsoil?
- c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?
- e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?
- f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. A significant impact would occur if the Proposed Project would cause personal injury or death or result in property damage as a result of a fault rupture occurring on the Project Site and if the Project Site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. The Alquist-Priolo Earthquake Fault Zoning Act is intended to mitigate the hazard of surface fault rupture on structures for human occupancy. According to the California Department of Conservation Special Studies Zone Map, the Project Site is not located within an Alquist-Priolo Special Studies Zone or Fault Rupture Study Area. As such, the Proposed Project would not expose people or structures to potential adverse effects resulting from the rupture of known earthquake faults. Therefore, no impacts would occur and no mitigation is required.

ii) Strong seismic ground shaking?

Less Than Significant Impact. A significant impact would occur if the Proposed Project would cause personal injury or death or resulted in property damage as a result of seismic ground shaking. The entire Southern California region is susceptible to strong ground shaking from severe earthquakes. Consequently, the Proposed Project could expose people and structures to strong seismic ground shaking. The design of the Project would be in accordance with the provisions of the latest California Building Code and Los Angeles Building Code (implemented at the time of building permits) will mitigate the potential effects of strong ground shaking. The design and construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the L.A.M.C., which incorporates the IBC. Compliance with current California Building Code and L.A.M.C. requirements will minimize the potential to expose people or structures to substantial risk of loss, injury or death. Therefore, impacts related to seismic ground shaking will be less than significant and no mitigation is required.

iii) Seismic-related ground failure, including liquefaction?

No Impact. A significant impact may occur if a Proposed Project Site is located within a liquefaction zone. Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during severe ground shaking. The site is not located in the California Department of Conservation's Seismic Hazard Zones Map, and the Project Site is not located within a liquefaction zone. Therefore, no impact related to seismic-related ground failure, including liquefaction, would occur and no mitigation is required.

iv) Landslides?

No Impact. A significant impact would occur if the Proposed Project would be implemented on a site that would be located in a hillside area with unstable geological conditions or soil types that would be susceptible to failure when saturated. According to the California Department of Conservation, Division of Mines and Geology, the Seismic Hazard Zones Map

for this area shows the Project Site is not located within a landslide hazard zone. The Project Site and surrounding area are relatively flat. Therefore, the Proposed Project would not expose people or structures to potential effects resulting from landslides, and no impacts would occur and no mitigation is required.

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

Less Than Significant Impact. Construction of Proposed Project would not result in ground surface disturbance. The project would result in mostly interior renovations and a third-floor addition to the existing structure. Construction activities would be performed in accordance with the requirements of the Los Angeles Building Code and the Los Angeles Regional Water Quality Control Board (LARWQBC) through the City's Stormwater Management Division. Therefore, the Proposed Project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant and no mitigation is required.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. A significant impact would occur if any unstable geological conditions would result in any type of geological failure, including lateral spreading, off-site landslides, liquefaction, or collapse. The Proposed Project would not have the potential to expose people and structures to seismic-related ground failure, including liquefaction and landslide. Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production. The extraction of groundwater or petroleum from sedimentary source rocks can cause the permanent collapse of the pore space previously occupied by the removed fluid. The Project Site is identified as being located in an oil field or within an oil drilling area. However, the Proposed Project would be required to implement standard construction practices that would ensure that the integrity of the Project Site and the existing structures are maintained. The Project will be required by the Department of Building and Safety to comply with the City of Los Angeles Uniform Building Code (UBC) which is designed to assure safe construction and includes building foundation requirements appropriate to site conditions. With the implementation of the Building Code requirements, the potential for landslide lateral spreading, subsidence, liquefaction or collapse would be less-than-significant and no mitigation is required.

d) Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

No Impact. A significant impact would occur if the Proposed Project would be built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus, posing a hazard to life and property. Expansive soils have relatively high clay mineral and expand with the addition of water and shrink when dried, which can cause damage to overlying structures. Soils on the Project Site may have the potential to shrink and swell resulting from changes in the moisture content. The Project Site is not located in an area known to have expansive soils. In addition, the Project is mainly the interior renovation and third floor addition to an existing building, which will result in little to no ground disturbance. Therefore, no impact will result and no mitigation is required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. A project would cause a significant impact if adequate wastewater disposal is not available. The Project Site is located in a highly urbanized area, where wastewater infrastructure is currently in place. The Proposed Project would connect to existing sewer lines that serve the Project Site and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur and no mitigation is required.

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

Less Than Significant Impact. A significant impact could occur if grading or excavation activities associated with the Project were to disturb unique paleontological resources or unique geologic features that presently exist within the Project Site. The Project Site is located within an urbanized area that has been subject to grading and development in the past and is not known to contain any unique paleontological resource or site or unique geologic feature. In addition, the Project is mainly the interior renovation and third floor addition to an existing building, which will result in little to no ground disturbance. Potential paleontological or geologic impacts of the Project would be less than significant, and no mitigation is required.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

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

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

Less Than Significant Impact. Greenhouse gases (GHG) are those gaseous constituents of the atmosphere, both natural and anthropogenic (human generated), that absorb and emit radiation at specific wavelengths within the spectrum of terrestrial radiation emitted by the earth's surface, the atmosphere itself, and by clouds. The greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass panes in a greenhouse let heat from sunlight in and reduce the amount of heat that escapes. GHGs, such as carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), keep the average surface temperature of the Earth close to 60 degrees Fahrenheit (°F). Without the greenhouse effect, the Earth would be a frozen globe with an average surface temperature of about 5°F. The City has adopted the Green New Deal to provide a citywide plan for achieving the City's GHG emissions targets, for both existing and future generation of GHG emissions. In order to implement the goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code (LAGBC) (Ordinance No. 179,890). As the LAGBC includes applicable provisions of the State's CALGreen Code, a new project that can demonstrate it complies with the LAGBC is considered consistent with statewide GHG reduction goals and policies including AB32 (California Global Warming Solutions Act of 2006). According to the GHG Impacts analysis conducted by Yorke Engineering dated October 7, 2021, impacts would be less than significant given the project will be consistent with Senate Bill SB 375 and the 2016 to 2040 Regional Transportation Plan/Sustainable Communities Strategy. Through required implementation of the LAGBC, and compliance with existing regulations, the Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs. Therefore, the Proposed Project's generation of GHG emissions would not make a cumulatively considerable contribution to emissions. Impacts will be less than significant and no mitigation is required.

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

Less Than Significant Impact. The California legislature passed Senate Bill (SB) 375 to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the SCAG region, the SCS is contained in the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2012-2035 RTP/SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas on existing main streets, in downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. In addition, SB 743, adopted September 27, 2013, encourages land use and transportation planning decisions and investments that reduce vehicle miles traveled that contribute to GHG emissions, as required by AB 32. The project is the interior renovation of approximately 141,000 square feet and a 30,000 square-foot addition to an existing hospital building within an urbanized area. It would not interfere with SCAG's ability to implement the regional strategies outlined in the 2012-2035 RTP/SCS. Impacts will be less than significant and no mitigation is required.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Less Than Significant Impact. A significant impact would occur if the Proposed Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The Project would repurpose a vacant hospital building with new medical offices and 40 senior independent living residences. No industrial uses or activities are proposed that would result in the use or discharge of unregulated hazardous materials and/or substances, or create a public hazard through transport, use, or disposal. The project will comply with all applicable rules of the Southern California Air Quality Management District. With compliance to applicable standards and regulations and adherence to manufacturer's instructions related to the transport, use, or disposal of hazardous materials, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant and no mitigation is required.

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

Less Than Significant Impact with Mitigation Incorporated. A significant impact would occur if the Proposed Project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials. The project will be subject to existing regulatory compliance with regards to Asbestos and Lead paint contaminants that may be within the existing structure during renovation and additions to the existing buildings. The project will be required to utilize an asbestos abatement consultant and if found to be present, must abate in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations. With regards to Lead base paint, standard handling and disposal practices will be implemented per OSHA regulations.

The project site at 3160 Geneva Street is in an area of metropolitan Los Angeles that underwent extensive oil and gas development in the late 19th and early 20th centuries. The project site is within the Los Angeles City Oil Field, northwest of downtown Los Angeles. The field runs east-west from immediately south of Dodger Stadium west to Vermont Avenue, encompassing an area of about 4 miles long by about 1/4-mile wide. The project site is at the western end of the field, near West 3rd Street and South Vermont Avenue, with a high density of abandoned oil wells.

The site is identified by the City of Los Angeles to be a Methane Zone. Methane Zones are areas that have a risk of methane intrusion emanating from geologic formations. Methane is known to be present in the area, sometimes rising up to the surface through natural fissures or abandoned wells where it can accumulate in confined spaces in older buildings that lack foundation vapor barriers or sufficient ventilation of basements, etc. Due to the project site's location, the project site is at risk for methane intrusion. The City of Los Angeles has required developmental regulations pertaining to ventilation and methane gas detection systems within Methane Zones. All new buildings and paved areas located in a Methane Zone must comply with Methane Mitigation Standards of L.A.M.C. Section 91.106.4.1 and Division 71 of Article 1, Chapter IX.

Per California Department of Conservation, Division of Oil, Gas and Geothermal Resources (“DOGGR”) records and Construction Site Well Review dated August 16, 2018 and revised on March 18, 2019 (Appendix G), the site contains 27 oil wells that were not plugged and abandoned to current Division requirements. Leak testing was recommended by the Division. According to the Summary Report for Oil/Gas well locations conducted by Terra-Petra dated October 31, 2019, records indicate that there are 20 on-site idle/buried/oil/gas wells and five plugged oil/gas wells within the public right of way (Note: Terra-Petra was not able to locate three (3) oil/gas wells identified by DOGGR as AP No. 03719209, AP No. 03719210 and API No. 03729211 on the Well Finder mapping database) (Appendix F). The identified wells were GPS located and were determined to be inaccessible for leak testing due to the wells being located beneath existing structures. Memos from Terra-Petra dated April 2, 2021, August 4, 2021, and September 30, 2021 (See Appendix D) recommended, in lieu of leak testing, to implement a dual phase mitigation system to consist of a Soil Vapor Extraction System (SVE) and a fully integrated gas detection system that is tied into the SVE system at one main control panel.

To comply with L.A.M.C. Section 91.106.4.1 and Division 71 of Article 1, Chapter IX, the selected control technology (mitigation measure) for fugitive methane leakage under the building is an “Active Sub-Slab Ventilation and Gas Detection System” consisting of a dual-phase soil vapor extraction (SVE) system. The term “dual-phase” means that the SVE system is the control component while the gas detection system acts as the backup safety warning component if any fugitive gases intrude into the building.

The proposed dual-phase SVE system is a microprocessor-controlled unit that utilizes variable-speed vacuum blowers. Sub-slab vapors are extracted under vacuum via the SVE piping network installed through 3-inch bore holes in the bottom slab of the building. As sub-slab concentrations change, the blower speeds vary up or down to draw the correct volume of gas-air mixture from below slab, through the piping system, exhausting at the roof line. In the event of a blower shutdown or failure, the gas detection and alarm system (audible and visual) will warn building occupants if hazardous levels of gases build-up, such as in the basement and parking garage. This feature, which is integrated into the main system control panel, meets current Level V requirements for Los Angeles Methane Zone properties. Further, the sensors can be adjusted to appropriate alarm-trip levels. The proposed Active Sub-Slab Ventilation and Gas Detection System is sufficient to mitigate any potentially hazardous fugitive methane gas leakage.

The dual phase mitigation measure proposal was peer reviewed by two additional environmental consulting firms; GSI Environmental and Hazard Management Consulting (Appendix E). Both firms analyzed the Terra Petra proposed mitigation dated April 2, 2021 and determined that the dual phase mitigation would be an adequate remedy in lieu of conducting leak testing of all unabandoned oil wells at the site. Leak testing would require extensive excavations that would not be practical or feasible without causing significant damage or demolition to the existing hospital building. The purpose of leak testing would be to determine if methane leakage were occurring at the abandoned oil wells. If leaks were found, a Soil Vapor Extraction System would be required to help dissipate methane gas to the environment. As such, the proposed Mitigation Measure, consisting of a dual phase mitigation system with integrated gas detection and soil

vapor extraction would remove any methane from the building envelope and route it to the exterior atmosphere. The system would ensure that any increase in methane concentration could be adequately detected and dissipated.

With imposition of the following mitigation measures, the project will be designed to protect the health and safety of all future inhabitants.

MM-1 Prior to the installation of the dual phase mitigation system, the applicant shall complete sub slab diagnostics testing to determine the correct vacuum (negative pressure) required to pull and exhaust any unwanted gases.

MM-2 The applicant shall install a dual phase mitigation system to include Soil Vapor Extraction System (SVE) and a Fully Integrated Gas Detection System that is tied to the SVE system at one control panel. There are two major components to this system:

- 1) Active Sub Slab Ventilation System – any soil gas contaminants will be drawn out from beneath the slab and then exhaust through the roof line, through a matrix of blower driven suction points;
- 2) Gas Detection System – integrated with the Sub Slab Ventilation System, this system will utilize methane gas sensors that are located in specific areas, as well as in line with exhaust system at roof line.

MM-3 If any wells were encountered, the applicant shall immediately notify DOGGR's appropriate well review engineer and submit for DOGGR review an amended site plan with surveyed well location. As needed, DOGGR would send a follow-up well evaluation letter to the property owner and local permitting agency. If wells are encountered, remedial plugging and re-abandonment operations may be required. No well work may be done without written approval by DOGGR.

The one control panel or Remote Management Technology will manage all aspects of the mitigation system, including sub slab vacuum required, fan motor speed, airflow, methane gas contractions, and other gases (if any). All data is monitored, recorded and stored on a dedicated secure server. Installation of the system should take approximately 8-10 weeks. With the proposed Mitigation Measures and compliance with existing city regulations, the Proposed Project would result in a less than significant impact related to the release of hazardous materials into the environment.

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

Less Than Significant Impact. A significant impact would occur if the Proposed Project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials within close proximity to a park. The site is within 500 feet of the Shatto

Recreation Center located at 3191 West 4th Street. The site is identified by the City of Los Angeles to be a Methane Zone. Methane Zones are areas that have a risk of methane intrusion emanating from geologic formations. The City of Los Angeles has required developmental regulations pertaining to ventilation and methane gas detection systems within Methane Zones. All new buildings and paved areas located in a Methane Zone must comply with Methane Mitigation Standards of L.A.M.C. Section 91.106.4.1 and Division 71 of Article 1, Chapter IX.

In addition, the project's Phase I Environmental Site Assessment (Appendix C) found that no Recognized Environmental Conditions (REC) were identified for the site, two (2) found Controlled Environmental Conditions (CREC) were associated with the in-place abandoned diesel UST at the northwest portion of the site in 1985 and the piping release of diesel fuel to soil at the southeast portion of the site in 2014, no Historical Recognized Environmental Conditions (HREC) were identified for the site, and the oil seeps in the basement garage area which appeared to reflect naturally-occurring petroleum known to exist in the Los Angeles Oil/Gas Field area was considered to present a de minimus condition.

Based on the available information, the Los Angeles Regional Water Quality Control Board (LARWQCB) determined that residual concentrations of fuel contaminants pose a low threat to human health and soil and groundwater quality beneath the site, and the LARWQCB UST Program decided not to open a case for the site, and it was determined that no further action pertaining to the UST related area was required at the time. LARWQCB stated that the site is located in the Los Angeles City Oil Field, an oily, petroleum tar substance is present beneath the site and continues to seep through the walls of the subterranean parking structure, and analysis of the material suggests the substance is naturally-occurring and not associated with site operations. With compliance with existing city regulations, the Proposed Project would result in a less than significant impact related to the release of hazardous materials into the environment. No mitigation is required.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less than Significant Impact. A significant impact would occur if the Project Site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would create a significant hazard to the public or the environment. The Geological Energy Management Division (CalGEM) maintains a database (EnviroStor) that provides access to detailed information on hazardous waste permitted sites and corrective action facilities, as well as existing site cleanup information. EnviroStor also provides information on investigation, cleanup, permitting, and/or corrective actions that are planned, being conducted, or have been completed under CalGEM's oversight. The subject site was not identified on EnviroStor. However, the site has been identified by the City as a site requiring construction review from the Geological Energy Management Division (CalGEM) due to a number of abandoned oil wells present beneath the site.. CalGEM oversees the drilling, operation, and closure of oil and gas wells within the State of California. Projects on a lot(s) with ZI-1195 require a clearance in PCIS from the Los Angeles Fire Department prior to permit issuance. During plan check, the Plan Check Engineer shall

instruct the applicant to obtain a Construction Site Well Review (CSWR) report from CalGEM prior to contacting the Fire Department. After CalGEM completes their review of the project, they will notify the applicant, property owner, and plan check engineer that the CSWR report is ready to be viewed and can be downloaded by logging into the WellSTAR database. Once the applicant has obtained a copy of the CSWR report, they can contact the Fire Department to request review and approval of the oil well clearance in PCIS. As such, impacts will be less than significant and no mitigation is required.

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

No Impact. The Project Site is not located within an airport land use plan, nor is it within two miles of a public or public use airport. Therefore, no impact will result and no mitigation is required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The project is not located along an emergency route (City of Los Angeles, Safety Element of the Los Angeles City General Plan, Critical Facilities and Lifeline Systems, Exhibit H, November 1996.) The Proposed Project would not require the closure of any public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. Additionally, emergency access to and from the Project Site would be provided in accordance with requirements of the Los Angeles Fire Department (LAFD). Therefore, the Proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and no impact would occur and no mitigation is required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project Site is located within a highly urbanized area of the City and does not include wildlands or high-fire-hazard terrain or vegetation. In addition, the Project Site is not identified by the City as being located within an area susceptible to fire hazards. Additionally, the proposed medical offices and senior independent living facility would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the project would not subject people or structures to a significant risk or loss, injury, or death as a result of exposure to wildland fires. No impacts related to this issue would occur, and no mitigation is required.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
iv. Impede or redirect flood flows?				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. A project could have a significant impact on surface water quality if discharges associated with the project were to create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the project would discharge water that does not meet the quality standards of local agencies that regulate surface water quality and water discharge into stormwater drainage systems.

The project is expected to comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts and the City's Low Impact Development (LID) Ordinance. The purpose of the LID standards is to reduce the peak discharge rate, volume, and duration of flow through the use of site design and stormwater quality control measures. The LID Ordinance requires that the project retain or treat the first three-quarters of an inch of rainfall in a 24-hour period. LID practices can effectively remove nutrients, bacteria, and metals while reducing the volume and intensity of stormwater flows.

The project consists of the renovation of an existing vacant hospital building and a 30,000 square-foot addition to create a third floor to house 40 senior independent living units, in an area characterized by a mix of low- and mid-rise residential buildings. The project does not involve the introduction of new activities or features that could be sources of contaminants that would degrade groundwater quality. As a result, the project would not create or contribute runoff water that would exceed the pollutant profile associated with the existing condition of the Project Site and its surroundings. As such, potential water quality impacts from the project would be less than significant and no mitigation is required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. A significant impact would occur if the Proposed Project would substantially deplete groundwater or interfere with groundwater recharge. The Proposed Project would not require the use of groundwater at the Project Site. Potable water would be supplied by the Los Angeles Department of Water and Power (LADWP), which draws its water supplies from distant sources for which it conducts its own assessment and mitigation of potential environmental impacts. Therefore, the project would not require direct additions or withdrawals of groundwater. Excavation to accommodate subterranean levels is not being proposed and the scope of the work thus would not result in the interception of existing aquifers or penetration of the existing water table. Additionally, any project that creates, adds, or replaces 500 square feet of impervious surface must comply with the Low impact Development (LID) Ordinance. The LID Ordinance requires that the project retain or treat the first three-quarters of an inch of rainfall in a 24-hour

period. As such, through project design features and through regulatory compliance, impacts on groundwater supplies and groundwater recharge would be less than significant and no mitigation is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. A significant impact would occur if the Proposed Project would substantially alter the drainage pattern of the site or area, including through the alteration of the course of a stream or river, such that erosion or siltation would result. The Project Site does not contain, nor is adjacent to, any stream or river. Project construction would temporarily expose on-site soils to surface water runoff. However, compliance with construction-related BMPs and/or the Storm Water Pollution Prevention Plan (SWPPP) would control and minimize erosion and siltation. During project operation, storm water or any runoff irrigation waters would be directed into existing storm drains that are currently receiving surface water runoff under existing conditions. Significant alterations to existing drainage patterns within the Project Site and surrounding area would not occur. Therefore, the Proposed Project would result in less-than-significant impact related to the alteration of drainage patterns and on- or off-site erosion or siltation and no mitigation is required.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less than Significant Impact. Site-generated surface water runoff would continue to flow to the City's storm drain system. Impermeable surfaces resulting from the development of the project would not significantly change the volume of stormwater runoff. The site is already developed with impermeable uses including a hospital building and landscaping. Accordingly, since the volume of runoff from the site would not measurably increase over existing conditions, water runoff after development would not exceed the capacity of existing or planned drainage systems. Any project that creates, adds, or replaces 500 square feet of impervious surface must comply with the Low impact Development (LID) Ordinance or alternatively, the City's Standard Urban Stormwater Mitigation Plan (SUSMP), as an L.A.M.C. requirement to address water runoff and storm water pollution. Therefore, the Proposed Project would result in less-than-significant impacts related to flooding on- or off-site and no mitigation is required.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less than Significant Impact. A significant impact would occur if runoff water would exceed the capacity of existing or planned storm drain systems serving the Project Site, or if the Proposed Project would substantially increase the probability that polluted runoff would reach the storm drain system. Site-generated surface water runoff would continue

to flow to the City's storm drain system. Pursuant to local practice and City regulations, stormwater retention would be required as part of City's Standard Urban Stormwater Mitigation Plan (SUSMP) implementation features and the requirements of the Low Impact Development (LID) ordinance requirements. The primary purpose of the LID ordinance is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of stormwater flows. Accordingly, with compliance to the LID ordinance, the project would not create or contribute to surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, the Proposed Project would result in less-than-significant impacts related to existing storm drain capacities or water quality and no mitigation is required.

iv. Impede or redirect flood flows?

No Impact. The Project Site is located in an urbanized area that is currently served by storm drain infrastructure. The site is currently developed with impermeable uses including a hospital building and landscaping. The project would not change the local drainage pattern; therefore, the project would not have the potential to impede or redirect floodwater flows. No impact would occur, and no mitigation measures are necessary.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. A significant impact would occur if the Project Site were sufficiently close to the ocean or other water body to potentially be at risk of seismically induced tidal phenomena (e.g., seiche and tsunami), or was within a flood zone, and if the Project Site utilized, stored or otherwise contained pollutants that would be at risk of release if inundated. The Project Site is not located within a Tsunami Inundation Zone or Flood Zone. Furthermore, the proposed use does not involve the storage or use of substantial quantities of potential pollutants. No impacts would occur and no mitigation is required.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. A significant impact could occur if the project includes potential sources of water pollutants that would have the potential to interfere with a water quality control plan or sustainable groundwater management plan. The project involves the renovation of an existing hospital building and the addition of 40 senior independent living units. As compared to existing conditions (hospital and landscaping) the project would not introduce different uses or potential sources of water pollutants. Moreover, the project would comply with the City's Low Impact Development (LID) ordinance, the primary purpose of which is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of storm water flows. No impacts would occur and no mitigation is required.

XI. LAND USE AND PLANNING

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- a. Physically divide an established community?
- b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

a) Physically divide an established community?

No Impact. A significant impact would occur if the Proposed Project would be sufficiently large or configured in such a way so as to create a physical barrier within an established community. A physical division of an established community is caused by an impediment to through travel or a physical barrier, such as a new freeway with limited access between neighborhoods on either side of the freeway, or major street closures. The Proposed Project would not involve any street vacation or closure or result in development of new thoroughfares or highways. The Proposed Project, which involves the renovation and 30,000 square-foot expansion of an existing facility in an urbanized area of Los Angeles, would not divide an established community. Therefore, no impact would occur and no mitigation is required.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant. A significant impact may occur if a project is inconsistent with a General Plan policy or zoning regulation was designed expressly to avoid or mitigate an environmental effect at the Project Site. The site is located within the Wilshire Community Plan with a proposed General Plan Land Use Designation of Community Commercial. The subject site is currently zoned R1-1. The property is not located within any Specific Plans or supplement Use District. The requested zone change to C2-2 is consistent with the proposed Community Commercial land use designation. The project is the interior renovation of approximately 141,000 square feet and a 30,000 square-foot addition to an existing hospital building. The proposed use is permitted in Community Commercial land use designation and is permitted in the requested C2-2 zone. The decision maker will determine whether the discretionary requests, including the General Plan Amendment, Zone Change request, and Site Plan Review determination will conflict with applicable plans/policies. Impacts related to land use are address through compliance with existing regulations. Therefore, the impact would be less than significant and no mitigation is required.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

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

No Impact A significant impact would occur if the Proposed Project would result in the loss of availability of known mineral resources of regional value or locally-important mineral recovery site. The Project Site is not classified by the City as containing significant mineral deposits. The Project Site is currently designated for Low II Medium and High Medium Residential land uses and not as a mineral extraction land use. The Project Site was identified as being located within the jurisdictional boundaries of DOGGR and is located within the Los Angeles Oil Field. Records indicate that 19 on-site idle/buried/oil/gas wells exist and five (5) plugged oil/gas wells exist at the site. However, the wells have been abandoned since the 1920s. Therefore, the Proposed Project would not result in the loss of availability of any known, regionally- or locally-valuable mineral resource, and no impact would occur and no mitigation is required.

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

No Impact. A significant impact would occur if the Proposed Project would result in the loss of availability of known mineral resources of regional value or locally-important mineral resource recovery site. The Project Site is not classified by the City as containing significant mineral deposits. The Project Site is currently designated for Low II and High Medium Residential land uses and not as a mineral extraction land use. The Project Site was identified as being located within the jurisdictional boundaries of DOGGR and is located within the Los Angeles Oil Field. Records indicate that 19 on-site idle/buried/oil/gas wells exist and five (5) plugged oil/gas wells exist at the site. However, the wells have been abandoned since the 1920s. Therefore, the Proposed Project would not result in the loss of availability of any known, regionally- or locally-valuable mineral resource, and no impact would occur and no mitigation is required.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project result in:

- 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?
- b. Generation of excessive groundborne vibration or groundborne noise levels?
- 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, would the project expose people residing or working in the project area to excessive noise levels?

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?

Less than Significant. According to the Air Quality and Noise Impact Assessment conducted by Yorke Engineering dated October 7, 2021, a noise impact is considered potentially significant if project construction activities extended beyond ordinance time limits for construction or construction-related noise levels exceed the ordinance noise level standards unless technically infeasible to do so. The Project would repurpose a vacant hospital building with new medical clinic and offices and 40 senior independent living residences. Construction noise levels will vary at any given receptor and are dependent on the construction phase, equipment type, duration of use, distance between the noise source and receptor, and the presence or absence of barriers between the noise source and receptor. The project does not propose to deviate from any requirements of the Noise Element of the General Plan, Section 111 of the L.A.M.C., or any other applicable noise standard. The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible. Construction noise is typically governed by ordinance limits on allowable times of equipment operations. The City of Los Angeles limits construction activities to the hours of 7:00 a.m. and 9:00 p.m. on weekdays and 8:00 a.m. to 6:00 p.m. on any Saturday. Construction is not permitted on any

national holiday or on any Sunday. Therefore, construction noise impacts will be less than significant and no mitigation is required.

Operation phase noise will occur mainly from heating, ventilation, and air conditioning equipment installed on the roof of the new building. However, noise generated by the new equipment is not expected to be substantially greater than noise generated by older HVAC equipment installed on existing buildings near the Project site. As such the new HVAC equipment and other equipment associated with the project would not represent a substantially new type of source of noise in the general vicinity. Furthermore, Project tenants will be required to comply with the Los Angeles Noise Ordinance standards, ensuring that the noise impacts from operation phase noise sources are less than significant. L.A.M.C. Section 112.02 prohibits noise levels from air conditioning, refrigeration, heating, pumping, and filtering equipment. Therefore, operational noise impacts will be less than significant and no mitigation is required.

b) Generation of, excessive groundborne vibration or groundborne noise levels?

Less than Significant. Construction activities can generate varying degrees of vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. Unless heavy construction activities are conducted extremely close (within a few feet) to the neighboring structures, vibrations from construction activities rarely reach the levels that damage structures. By complying with regulations, the project would result in a less-than-significant impact related to construction vibration and no mitigation is required.

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, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project is not located within two miles of a private airstrip or an airport land use plan. No impact will result and no mitigation is required.

XIV. POPULATION AND HOUSING

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

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

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

Less than Significant. A potentially significant impact would occur if the Proposed Project would induce substantial population growth that would not have otherwise occurred as rapidly or in as great a magnitude. The Project would repurpose a vacant hospital building with new medical offices and 40 senior independent living residences. The project will accommodate jobs, in keeping with the Community Plan land use, and would not substantially induce population growth in the project area, either directly or indirectly. The physical secondary or indirect impacts of population growth such as increased traffic or noise have been adequately studied in other portions of this document. Therefore, the impact would be less than significant and no mitigation is required.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project Site does not contain existing dwelling units. The Project would repurpose a vacant hospital building with new medical offices and 40 senior independent living residences. Thus, the project will result in a net increase of 40 units at the site, with five units being reserved as restricted income units. Therefore, no impact will result and no mitigation is required.

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Fire protection?

Less Than Significant Impact. A significant impact would occur if the Los Angeles Fire Department (LAFD) could not adequately serve the Proposed Project, necessitating a new or physically altered station. The Project Site and the surrounding area are currently served by LAFD Fire Station 6, located at 326 North Virgil Avenue, located approximately 0.7 miles north of the Project Site. The Project would repurpose a vacant hospital building with new medical offices and 40 senior independent living residences, which could increase the number of emergency calls and demand for LAFD fire and emergency services. To maintain the level of fire protection and emergency services, the LAFD may require additional fire personnel and equipment. However, it is not anticipated that there would be a need to build a new or expand an existing fire station to serve the Proposed Project and maintain acceptable service ratios, response times, or other performance objectives for fire protection. By analyzing data from previous years and continuously monitoring current data regarding response times, types of incidents, and call frequencies, LAFD can shift resources to meet local demands for fire protection and emergency services. The Proposed Project would neither create capacity or service level problems nor result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Therefore, the Proposed Project would result in a less than significant impact and no mitigation is required.

b) Police protection?

Less Than Significant Impact. The Project has the potential to increase the demand for police services in the area. However, the Project Site and the surrounding area are currently served by the LAPD Olympic Community Police Station at 1130 South Vermont, is approximately 1.5 miles north of the Project Site. Given that there is a police station in close proximity to the Project Site, it is not anticipated that there would be a need to build a new or expand an existing police station to serve the Proposed Project and maintain acceptable service ratios, response times, or other performance objectives for police protection. Impacts will be less than significant and no mitigation is required.

c) Schools?

No Impact. Implementation of the Proposed Project would include the construction of up to 40 senior independent living residences, which would not increase the number of students attending surrounding LAUSD grade schools.. Therefore, the Proposed Project's potential impact on public school services would be less than significant and no mitigation is required.

d) Parks?

Less than Significant Impact. The Project will result in the addition of 40 senior independent living residences. The Project is required to provide 4,000 square feet of open space. The Project will provide 5,300 square feet of open space, consisting of private deck space, courtyard space, and a rooftop deck. As the project is providing dedicated open space, impacts on existing park facilities are expected to be less than significant and no mitigation is required.

e) Other public facilities?

Less than Significant Impact. The Project would renovate an existing vacant hospital building with a new medical office and 40 units of senior independent living residences. The project will not result in a substantial increase in regional employment or population growth. Therefore, the Project would not result in the need to construct any new or physically alter governmental facilities, such as libraries. As such, impacts will be less than significant and no mitigation is required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Less than Significant. A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities. The Project is proposing to reactivate 141,000 square feet of floor area to repurpose as medical office and to add 40 senior independent living residential units. The project will not result in a substantial increase in number of jobs or residents in the area such that deterioration of recreational facilities would occur or be accelerated. Therefore, a less than significant impact would occur and no mitigation is required.

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

No Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. The Project would not be adding enough employment or residents to the area to require the construction or expansion of recreational facilities. Therefore, no impact would occur and no mitigation is required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) (Would vehicle miles traveled exceed an applicable threshold of significance?)
- c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- d. Result in inadequate emergency access?

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Roadway Circulation System

Less than Significant Impact. As significant impact to the Circulation System may occur if the project causes an increase Vehicle Miles Traveled (VMT) that surpasses Los Angeles Department of Transportation's (DOT) established traffic impact criteria². The project will increase the number of daily trips for the site by 3,320 trips per day with a net increase in daily VMT of 20,687. Based on the trip count, DOT determined a VMT analysis was needed to further determine if the project would have a potential impact. The DOT Assessment dated February 1, 2021 determined that the project will not have a significant transportation impact under Thresholds T-1 (conflicting with plans, programs, ordinances, or policies) and T-3 (substantially increasing hazards due to a geometric design feature or incompatible use). DOT determined the project impacts would be less than significant. The project is required to provide Project Design Features through CEQA Corrective Measures including reduced parking supply, transit subsidies and promotions and marketing and non-CEQA related requirements and considerations to further reduce traffic impacts. A reduced parking supply makes parking less available and therefore encourages the use of non-automobile modes to and from the Project Site and reduces VMT.

² Per the DOT Traffic Study Assessment form, VMT analysis is required if the project would generate a net increase of 250 or more daily vehicle trips.

Project Design Feature (PDF) –

- a. **Reduced Parking Supply.** The project shall provide no more than 153 on-site automobile parking spaces.
- b. **Transit Subsidies.** The subsidization of transit fares for residents and employees will be provided for approximately 90 percent of the employees and residents at a daily equivalent of 0.75 cents.
- c. **Promotions & Marketing:** The project will provide education and encouragement programs that include promotions and marketing to inform travelers about the availability of specific transportation options.

Additionally, the project is providing the adequate and required right-of-way dedications pursuant to the Mobility Plan 2035. Therefore, the project would not conflict with a program, plan, ordinance or policy addressing the vehicular circulation system.

Transit, Roadway, Bicycle and Pedestrian Facilities

No Impact. The proposed project is occurring on private property and will not conflict with any program, plan, ordinance, or policy related to transit, bicycle or pedestrian facilities. The project is adjacent to transit and does not impede any exiting or future transit systems. The project provides bicycle parking as is required by Ordinance. The project would not impeded construction of future bicycle facilities within the public right of ways adjacent to the project. The project provides adequate sideways and pedestrian access to the site. Therefore, no impact will occur and no mitigation is required.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? (Would vehicle miles traveled exceed an applicable threshold of significance?)

Less than Significant Impact. Pursuant to CEQA Guidelines section 15064.3, subdivision (b), a significant impact to the transportation system may occur if the project causes an increase Vehicle Miles Traveled (VMT) that surpasses Los Angeles Department of Transportation's (DOT) established traffic impact criteria. The project will increase the number of daily trips for the site by 3,320 trips per day. The trip count was above DOT's 250 trip threshold for requiring further analysis. The DOT Assessment dated February 1, 2021 determined that the project will not have a significant transportation impact under Thresholds T-1 (conflicting with plans, programs, ordinances, or policies) and T-3 (substantially increasing hazards due to a geometric design feature or incompatible use).

The LADOT VMT Calculator tool measures project impact in terms of Household VMT per Capita, and Work VMT per Employee. LADOT identified distinct thresholds for significant VMT impacts for each of the seven Area Planning Commission (APC) areas in the City. For the Central APC area, in which the project is located, the following thresholds have been established:

- Household VMT per Capita: 6.0
- Work VMT per Employee: 7.6

The results show that with the Project, the Household VMT per Capita would be 1.5 compared to the threshold of 6.0, and the Work VMT per Capita would be 5.8 compared to the threshold of 7.6. Therefore, it is concluded that the Project would not cause significant VMT impacts for both Household VMT and Work VMT.

The project will be required to introduce a Transportation Demand Management plan that is designed to reduce the use of single occupancy vehicles. As a Project Design Feature, the project will be required to reduce the amount of parking provided on-site to at most 153 parking spaces. The project will also be required to provide transit subsidies which will be provided for approximately 90 percent of employees and residents at a daily equivalent of 0.75 cents. The project will also be required to provide education and encouragement programs to inform travelers about the availability of specific transportation options. Therefore, the project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

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

No Impact. A significant impact could occur if a project were to include new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if access or other features were designed in such a way as to create hazard conditions. The Project Site is currently developed with the Shriner's Children's Hospital. The Project will redevelop the site with medical offices and the addition of 40 senior independent living residences. No changes are proposed to the surrounding road system. The project would retain an existing curb cut for egress/ingress into an existing parking garage and would not include unusual design features. Adherence to all emergency response plan requirements set forth by the City and LAFD would be required through the duration of the project's construction and operation phases. There would be no impacts regarding hazards due to a design feature.

d) Result in inadequate emergency access?

No Impact. A significant impact would occur if the Proposed Project would result in inadequate emergency access. The project does not propose any changes to emergency access, and will require approval of plans by the Fire Department. Further, the project must comply with all applicable City fire safety regulations. No impact will occur and no mitigation is required.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a. 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: 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)?

No Impact. The Project Site has not been 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). Therefore, no impact will result and no mitigation is required.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: 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?

No Impact. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an ND, MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a Proposed Project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a Proposed Project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. In compliance with AB 52, the City provided notice to tribes soliciting requests for consultation on December 10, 2019. On March 3, 2021, the Gabrieleno Band of Mission Indians – Kizh Nation requested to engage in tribal consultation. On March 3, 2021, after discussions with Planning staff to further clarify that no ground disturbance activities are anticipated from the project, the tribe

agreed that no consultation would be necessary. No other responses were received from any tribes during the 30-day period. On March 4, 2020, the consultation period concluded. Thus, impacts related to tribal cultural resources will be less than significant and no mitigation is required.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact.

Water

Prior to any construction activities, the project applicant would be required to coordinate with the City of Los Angeles Bureau of Sanitation (BOS) to determine the exact wastewater conveyance requirements of the Proposed Project, and any upgrades to the wastewater lines in the vicinity of

the Project Site that are needed to adequately serve the Proposed Project would be undertaken as part of the project. Therefore, impacts related to wastewater treatment would be less than significant.

The project will be served by the City's sewer system and is not expected to exceed wastewater treatment requirements in the area. Impacts will be less than significant.

The Project Site is located in a developed, urbanized portion of Los Angeles that is served by existing electric power, natural gas and telecommunications services. The Project would repurpose a vacant hospital building with new medical offices and 40 senior independent living residences. In the context of the greater Los Angeles service area, the Project would not be a substantial source of new demand for services. New connections would be established for the Project; however, no substantial additional infrastructure would need to be installed or relocated to provide electric power facilities, natural gas facilities, or telecommunication services.

Furthermore, the Project Applicant shall be required to implement applicable building code and LA Green Building Code requirements that would further reduce demand for water, wastewater and energy services. Based on the above, potential impacts of the Project would be less than significant, and no mitigation measures are required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. A significant impact would occur if the Proposed Project would increase water consumption to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. The Los Angeles Department of Water and Power (LADWP) conducts water planning based on forecast population growth. Accordingly, the increase in employees at the site resulting from the Proposed Project would not be considered substantial in consideration of anticipated growth. The repurposing of 141,000 square feet of floor area for medical office and the net increase of 40 residential units resulting from implementation of the Proposed Project would be consistent with Citywide growth, and, therefore, the project demand for water is not anticipated to require new water supply entitlements and/or require the expansion of existing or construction of new water treatment facilities beyond those already considered in the LADWP 2010 Urban Water Management Plan. Thus, it is anticipated that the Proposed Project would not create any water system capacity issues, and there would be sufficient reliable water supplies available to meet project demands. Prior to any construction activities, the project applicant would be required to coordinate with the City of Los Angeles Bureau of Sanitation (BOS) to determine the exact wastewater conveyance requirements of the Proposed Project, and any upgrades to the wastewater lines in the vicinity of the Project Site that are needed to adequately serve the Proposed Project would be undertaken as part of the project. Therefore, the Proposed Project would have a less-than-significant impact related to water or wastewater infrastructure and no mitigation is required.

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

Less Than Significant Impact. The project will be served by the City's sewer system and is not expected to exceed wastewater treatment requirements in the area. Impacts will be less than significant and no mitigation is required.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. The Project would repurpose a vacant hospital building with new medical offices and 40 senior independent living residences. The Project will be required to comply with current regulations required by the Department of Building and Safety (L.A.M.C. Section 99.04.408.1) and the Bureau of Sanitation (L.A.M.C. Section 66.32), which requires the recycling and proper disposal of solid waste. Impacts will be less than significant and no mitigation is required.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less than Significant Impact. A significant impact could occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. These regulations include:

- California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939). AB 939 requires cities and counties to reduce the amount of solid waste entering existing landfills through recycling, reuse, and waste prevention efforts. These efforts have included permitting procedures for waste haulers and handlers.
- California Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327), which requires local jurisdictions to adopt an ordinance requiring commercial buildings to provide an adequate storage area for the collection and removal of recyclable materials. The City of Los Angeles passed such an ordinance in 1997.
- AB 341 of 2012 requires businesses to arrange for recycling services.
- Los Angeles Green Code incorporates the CALGreen Code and is applicable to the construction of new buildings by addressing construction waste reduction, disposal, and recycling.
- Los Angeles Citywide Construction and Demolition Waste Recycling Ordinance requires haulers and contractors responsible for handling C&D waste to obtain a Private Solid Waste Hauler Permit from the Bureau of Sanitation prior to collecting, hauling, and transporting C&D waste, and C&D waste can only be taken to City-certified C&D processing facilities.

The proposed industrial project must comply with federal, state, and local statutes and regulations relating to solid waste. Impacts will therefore be less than significant.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- a. Substantially impair an adopted emergency response plan or emergency evacuation plan?
- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project is not located in or near State responsibility areas or lands classified as very high fire hazard zones. The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. As such, no impacts would occur, and no mitigation is required.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project is not located in or near State responsibility areas or lands classified as very high fire hazard zones. The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. As such, no impacts would occur and no mitigation is required.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project is not located in or near State responsibility areas or lands classified as very high fire hazard zones. The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. In addition, the Project Site is not identified by the City as being located within an area susceptible to fire hazards. As such, no impacts would occur and no mitigation is required.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project is not located in or near State responsibility areas or lands classified as very high fire hazard zones. The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. In addition, as previously discussed, the Project Site is not susceptible to potential flooding or landslide, nor would the Project result in potential drainage changes. As such, no impacts would occur and no mitigation is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
<u>Less Than Significant Impact.</u> Based on the analysis of this Initial Study, the Proposed Project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. The project is occurring in an urbanized area on a presently residentially zoned site that is developed with a former hospital building. There is not significant wildlife or animal or plant communities on the site. Therefore, the impact is less than significant and no mitigation is required.				

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project, in conjunction with related projects, would result in impacts that are less than significant when viewed separately but significant when viewed together. Although projects may be constructed in the project vicinity, the cumulative impacts to which the Proposed Project would contribute would be less than significant. None of these potential impacts are considered cumulatively considerable. Impacts will be less than significant and no mitigation is required.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. No significant impacts were identified. The Proposed Project would not have the potential to result in substantial adverse impacts on human beings either directly or indirectly. No mitigation is required.