



INITIAL STUDY

Encino–Tarzana Community

Providence Tarzana Medical Center

Case Number: ENV-2016-1662-EIR

Project Location: 18321 Clark St., Tarzana, CA 91356

Council District: 3—Bob Blumenfield

Project Description: Providence Health System–Southern California, the Project Applicant, proposes new and improved facilities and improved access to care at the Providence Tarzana Medical Center as part of the Providence Tarzana Medical Center Project (Project). The Project will be implemented on the existing Providence Tarzana Medical Center (Project Site) located in the Encino–Tarzana community of the City of Los Angeles. The Project Site comprises approximately 13 acres and is currently improved with four permanent buildings, eight modular buildings, a parking structure, and surface parking areas. The Project proposes upgrades and enhancements to the Hospital on the Project Site, including enhancing the existing Hospital lobby (Lobby Enhancement), expanding the diagnostic and treatment areas (D&T Expansion), constructing a new central utility plant in the basement of the D&T Expansion, and constructing a new patient wing (New Patient Wing). The Project would also include the construction of a new above grade seven-level parking structure that would provide approximately 650 parking spaces. To provide for the proposed improvements, the Project would include removal of the existing pharmacy within the Hospital, eight modular buildings, and the MRI Building. The uses in these existing buildings to be removed, including the pharmacy, would be relocated to the Hospital. Overall, the Project would remove approximately 17,948 square feet of existing floor area and construct approximately 292,000 square feet of new floor area, resulting in a net increase of approximately 274,052 square feet of net new floor area within the Project Site.

APPLICANT:
Providence Health System–
Southern California

PREPARED BY:
Eyestone Environmental

ON BEHALF OF:
The City of Los Angeles
Department of City Planning
Major Projects and
Environmental Review Section

July 2016

Table of Contents

	<u>Page</u>
INITIAL STUDY AND CHECKLIST	
ATTACHMENT A: PROJECT DESCRIPTION.....	A-1
ATTACHMENT B: EXPLANATION OF CHECKLIST DETERMINATIONS	B-1

APPENDICES

- IS-1 Tree Report
- IS-2 Archaeological and Paleontological Response Letters
- IS-3 Geotechnical Memorandum

List of Figures

<u>Figure</u>		<u>Page</u>
A-1	Project Location Map	A-2
A-2	Aerial Photograph of the Project Vicinity.....	A-4
A-3	Existing Site Plan.....	A-5
A-4	Conceptual Site Plan	A-11

List of Tables

<u>Table</u>		<u>Page</u>
A-1	Summary of Existing and Proposed Floor Area	A-10
B-1	Estimated Project Solid Waste Generation	B-44

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 615, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY AND CHECKLIST

(Article IV B City CEQA Guidelines)

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
City of Los Angeles Department of City Planning	3	July 15, 2016

RESPONSIBLE AGENCIES

Including, but not limited to, the Regional Water Quality Control Board, South Coast Air Quality Management District, Los Angeles Building and Safety, Los Angeles Department of Water and Power, Los Angeles Department of Transportation.

PROJECT TITLE/NO.

Providence Tarzana Medical Center

CASE NO.

ENV-2016-1662-EIR

PREVIOUS ACTIONS CASE NO.

DOES have significant changes from previous actions.

DOES NOT have significant changes from previous actions.

PROJECT DESCRIPTION:

The Project proposes upgrades and enhancements to the existing Hospital within the Providence Tarzana Medical Center, including enhancing the existing Hospital lobby (Lobby Enhancement), expanding the diagnostic and treatment areas (D&T Expansion), constructing a new central utility plant in the basement of the D&T Expansion, and constructing a new patient wing (New Patient Wing). The Lobby Enhancement would be approximately 35 feet in height, the D&T Expansion would reach approximately 45 feet in height, and the New Patient Wing would be six stories with an approximate height of 120 feet.

The Project would also include the construction of a new above grade seven-level parking structure that would provide approximately 650 parking spaces (New Parking Structure). The New Parking Structure would have an approximate height of 70 feet. The Project Site currently provides 1,259 parking spaces. Once the Project is completed, 1,611 parking spaces would be provided on-site.

To provide for the proposed improvements, the Project would include removal of the existing pharmacy within the Hospital, eight modular buildings, and the MRI Building. The uses in these existing buildings to be removed, including the pharmacy, would be relocated to the Hospital. Overall, the Project would remove approximately 17,948 square feet of existing floor area and construct approximately 292,000 square feet of new floor area, resulting in a net increase of approximately 274,052 square feet of net new floor area within the Project Site. Refer to Attachment A: Project Description, of this Initial Study, for a detailed description of the Project.

ENVIRONMENTAL SETTING:

The Project Site is located in a highly urbanized area characterized primarily by low- to mid-rise buildings that are occupied by commercial, residential, and medical uses. Land uses surrounding the Project Site include office uses to the north, across Burbank Boulevard; the Tarzana Medical Plaza and, across Etiwanda Avenue and an intervening flood control channel, single-family and multi-family residential uses to the east; multi-family residential uses and medical uses associated with a medical and dental office building known as Tarzana Medical Square (not associated with Providence Tarzana Medical Center) to the south across Clark Street; and commercial uses, including a supermarket, retail, and a storage company, to the west (on the east side of Reseda Boulevard).

PROJECT LOCATION

The Project Site is located at 18321 Clark Street within the Encino-Tarzana community of the City of Los Angeles, approximately 18 miles northwest of downtown Los Angeles and approximately nine miles northeast of the Pacific Ocean. The Project Site is generally bounded by Burbank Boulevard and the eastbound on-ramp to the Ventura Freeway (US-101) on the north, the Tarzana Medical Plaza on the east, Clark Street on the south, and commercial uses on the west. Beyond the intervening Tarzana Medical Plaza is Etiwanda Avenue to the east. Beyond the intervening commercial uses is Reseda Boulevard to the west. Primary regional access is provided by the Ventura Freeway, which runs east-west adjacent to the Project Site. The major arterials that provide regional and sub-regional access to the Project Site vicinity include Ventura Boulevard, Reseda Boulevard, and Lindley Avenue.

PLANNING DISTRICT

Encino-Tarzana Community/Ventura-Cahuenga Boulevard Corridor Specific Plan

STATUS:

- PRELIMINARY
- PROPOSED
- ADOPTED

EXISTING ZONING	MAX. DENSITY ZONING	<input checked="" type="checkbox"/> DOES CONFORM TO PLAN <input type="checkbox"/> DOES NOT CONFORM TO PLAN <input type="checkbox"/> NO DISTRICT PLAN
[Q]C2-1L, with portions of the Project Site zoned C2-1 and P-1		
PLANNED LAND USE & ZONE	MAX. DENSITY PLAN	
Community Commercial and [Q]C2-1L, with portions of the Project Site zoned C2-1	C2-1: 1.5:1	
SURROUNDING LAND USES	PROJECT DENSITY	
Commercial, residential, medical, and public facilities	1.06:1	

DETERMINATION (To be completed by 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.

CITY PLANNING ASSOCIATE

SIGNATURE

TITLE

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 Section XVII, “Earlier Analysis,” 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.

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

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

 **BACKGROUND**

PROPONENT NAME	PHONE NUMBER
Providence Health System-Southern California	(310) 793-8092

PROPONENT ADDRESS

20555 Earl Street, Torrance, CA 90503

AGENCY REQUIRING CHECKLIST	DATE SUBMITTED
City of Los Angeles, Department of City Planning	July 15, 2016

PROPOSAL NAME (If Applicable)

 **ENVIRONMENTAL IMPACTS**

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

Refer to Attachment B: Explanation of Checklist Determinations, of this Initial Study, for detailed explanations to this Initial Study Checklist.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
II. AGRICULTURE AND FOREST 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. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IV. BIOLOGICAL RESOURCES. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

V. CULTURAL RESOURCES: Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75, §5097.98, and Health and Safety Code §7050.5(b))?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Cause a substantial adverse change in the significance of a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or determined eligible for listing on the California register of historical resources, listed on a local historical register, or otherwise determined by the lead agency to be a tribal cultural resource?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

VI. GEOLOGY AND SOILS. Would the project:

a. Expose people or structures to 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994),	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
creating substantial 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

VII. GREENHOUSE GAS EMISSIONS. Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

VIII. HAZARDS AND HAZARDOUS MATERIALS. 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" 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 it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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IX. HYDROLOGY AND WATER QUALITY. Would the project:

- | | | | | |
|---|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Violate any water quality standards or waste discharge requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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, in a manner which would result in substantial erosion or siltation on- or off-site? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. 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? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Otherwise substantially degrade water quality? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| j. Inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

X. LAND USE AND PLANNING. Would the project:

- | | | | | |
|---|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Conflict with any applicable habitat conservation plan or natural community conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XI. MINERAL RESOURCES. 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

XII. NOISE. Would the project result in:

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input 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 expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

XIII. POPULATION AND HOUSING. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Induce substantial 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)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIV. 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:

- | | | | | |
|-----------------------------|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Fire protection? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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"/> |

XV. RECREATION.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| 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"/> |

XVI. TRANSPORTATION/TRAFFIC. Would the project:

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Result in inadequate emergency access? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XVII. UTILITIES AND SERVICE SYSTEMS. Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Other utilities and service systems?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.

a. Does the project have the potential to 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, 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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current projects, and the effects of probable future projects).

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

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)

PREPARED BY	TITLE	TELEPHONE #	DATE
Stephanie Eyestone-Jones Eyestone Environmental 6701 Center Drive West, Suite 900 Los Angeles, CA 90045	President	(424) 207-5333	July 15, 2016

A. Project Description

Attachment A: Project Description

A. Introduction

Providence Health System–Southern California, the Project Applicant, proposes new and improved facilities and improved access to care at the Providence Tarzana Medical Center as part of the Providence Tarzana Medical Center Project (Project). The Project will be implemented on the existing Providence Tarzana Medical Center (Project Site) located in the Encino–Tarzana community of the City of Los Angeles. The Project Site comprises approximately 13 acres and is currently improved with four permanent buildings, eight modular buildings, a parking structure, and surface parking areas. The Project proposes upgrades and enhancements to the Hospital on the Project Site, including enhancing the existing Hospital lobby (Lobby Enhancement), expanding the diagnostic and treatment areas (D&T Expansion), constructing a new central utility plant in the basement of the D&T Expansion, and constructing a new patient wing (New Patient Wing). The Project would also include the construction of a new above grade seven-level parking structure that would provide approximately 650 parking spaces. To provide for the proposed improvements, the Project would include removal of the existing pharmacy within the Hospital, eight modular buildings, and the MRI Building. The uses in these existing buildings to be removed, including the pharmacy, would be relocated to the Hospital. Overall, the Project would remove approximately 17,948 square feet¹ of existing floor area and construct approximately 292,000 square feet of new floor area, resulting in a net increase of approximately 274,052 square feet of net new floor area within the Project Site. At buildout, the Project Site would include approximately 596,994 square feet of floor area.

B. Project Location and Surrounding Uses

The Project Site is located at 18321 Clark Street within the Encino–Tarzana community of the City of Los Angeles, approximately 18 miles northwest of downtown Los Angeles and approximately nine miles northeast of the Pacific Ocean. As shown in Figure A-1 on page A-2, the Project Site is generally bounded by Burbank Boulevard and the eastbound on-ramp to the Ventura Freeway (US-101) on the north, the Tarzana Medical Plaza on the east, Clark Street on the south, and commercial uses on the west.

¹ All square footage numbers represent floor area as defined by LAMC Section 12.03.

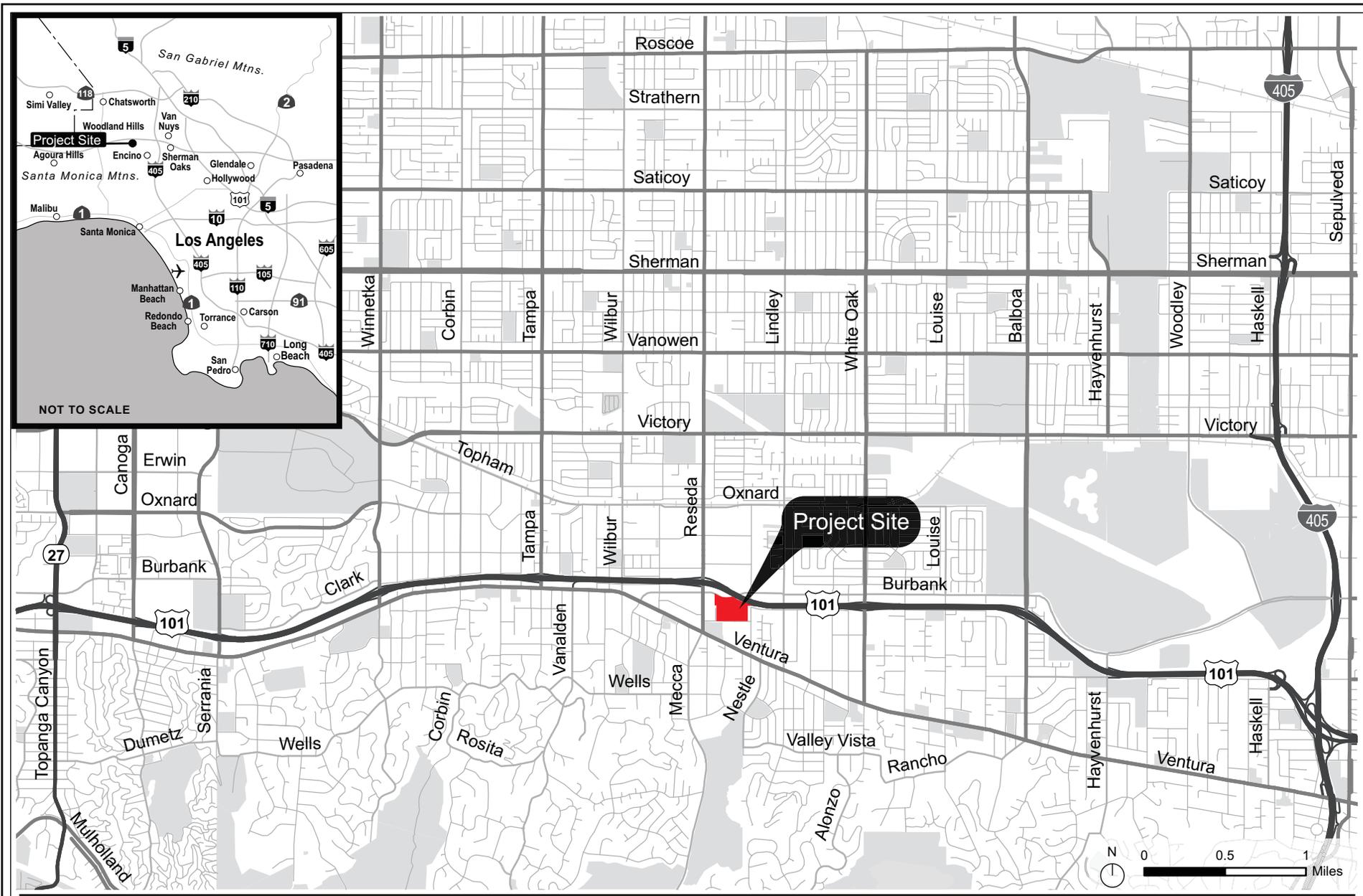


Figure A-1
Project Location Map

Source: Eyestone Environmental, 2016; Los Angeles County GIS, 2014.

Beyond the intervening Tarzana Medical Plaza is Etiwanda Avenue to the east. Beyond the intervening commercial uses is Reseda Boulevard to the west. Primary regional access is provided by the Ventura Freeway, which runs east-west adjacent to the Project Site. The major arterials that provide regional and sub-regional access to the Project Site vicinity include Ventura Boulevard, Reseda Boulevard, and Lindley Avenue.

As shown in the aerial photograph in Figure A-2 on page A-4, the Project Site is located in a highly urbanized area characterized primarily by low- to mid-rise buildings that are occupied by commercial, residential, and medical uses. Land uses surrounding the Project Site include office uses to the north, across Burbank Boulevard; the Tarzana Medical Plaza and, across Etiwanda Avenue and an intervening flood control channel, single-family and multi-family residential uses to the east; multi-family residential uses and medical uses associated with a medical and dental office building known as Tarzana Medical Square (not associated with Providence Tarzana Medical Center) to the south across Clark Street; and commercial uses, including a supermarket, retail, and a storage company, to the west (on the east side of Reseda Boulevard).

C. Background and Existing Project Site Conditions

1. Background and Existing Uses

Providence Tarzana Medical Center is a full-service hospital and medical center. The Medical Center was founded in 1973 as part of the Encino–Tarzana Regional Medical Center. In 2008, Providence Health System–Southern California purchased the facilities, which became part of the Providence Health System, a non-profit organization.

The Project Site is currently developed with a 249-bed Hospital and medical office buildings providing patient care in the San Fernando Valley. The Providence Tarzana Medical Center is fully accredited by the Joint Commission on the Accreditation of Healthcare Organizations. In addition to providing health care services, the Providence Tarzana Medical Center serves the surrounding community by allowing community and group meetings to take place at the Hospital.

The Project Site consists of seven contiguous parcels comprising approximately 13 acres. As shown in Figure A-3 on page A-5, the Project Site is currently improved with four buildings, eight modular buildings (including Buildings A-G and the Foundation Building), a parking structure, and various surface parking areas. In total, the Project Site includes approximately 322,942 square feet of floor area of medical facilities. The heights of the existing on-site buildings range from approximately 16 feet to approximately 100 feet. Following is a description of each of the existing buildings and structures on the Project Site:

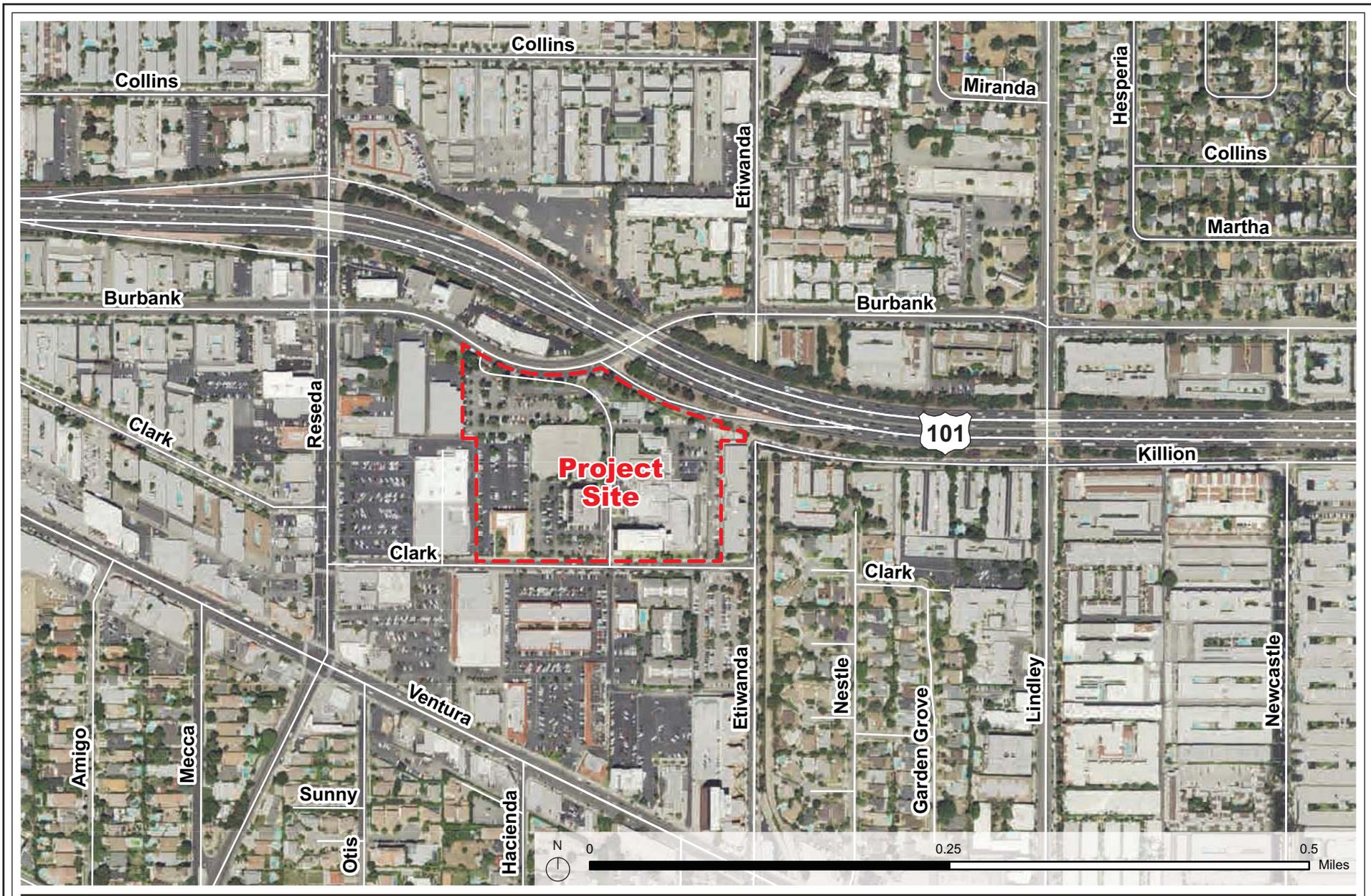


Figure A-2
Aerial Photograph of the Project Vicinity

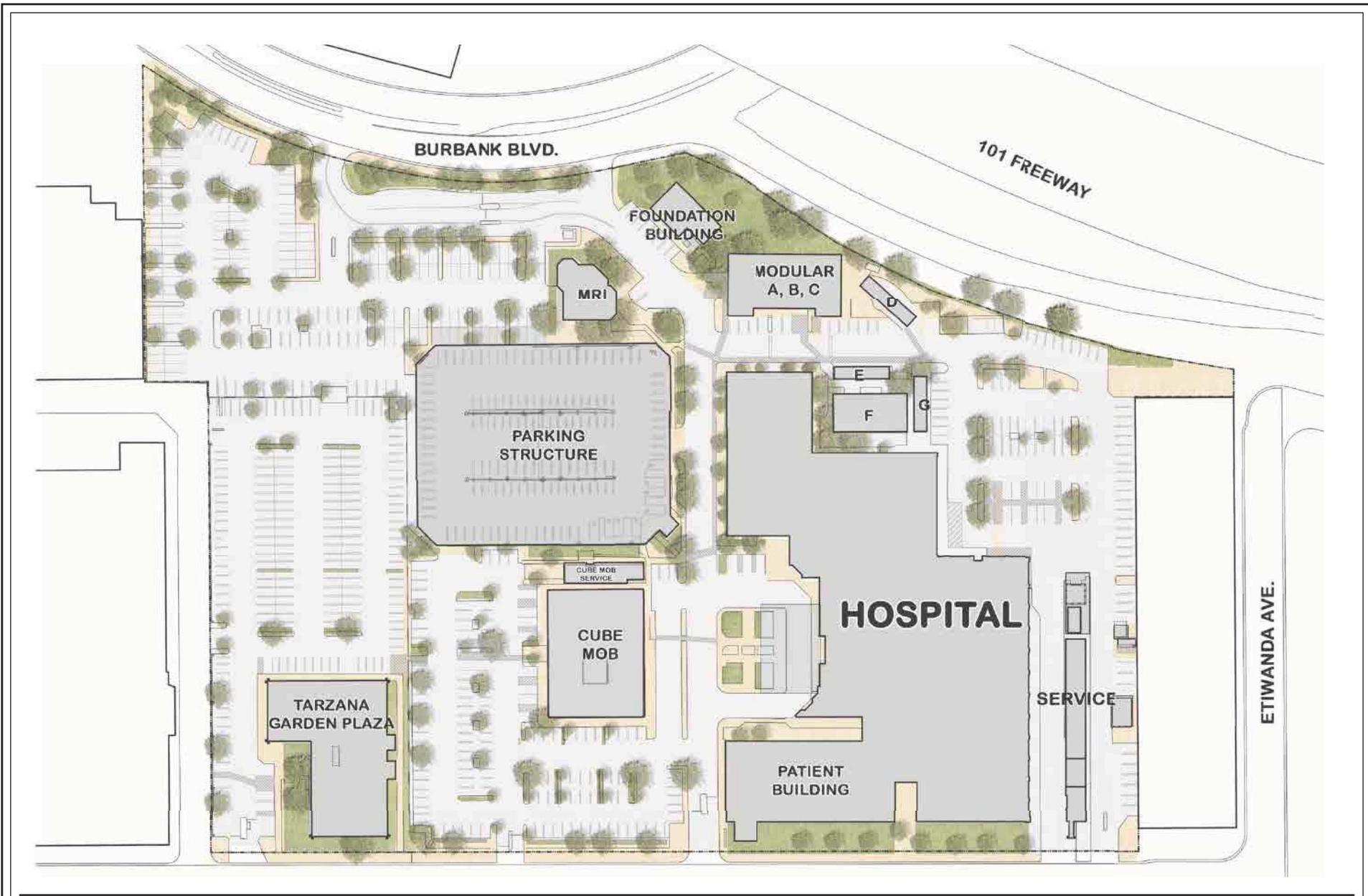


Figure A-3
Existing Site Plan

- **Hospital:** The largest building on the Project Site is the Hospital, which is approximately 204,097 square feet. The Hospital consists of several connected areas, which are at times referred to as the Main Building, the Ancillary Wing, the Existing Patient Building, and the Women's Pavilion. The Hospital also includes the Emergency Department. The Existing Patient Building contains 195 acute care beds, the Main Building contains 21 acute care beds in the Neonatal Intensive Care Unit (NICU), and the Women's Pavilion contains 33 beds, for a total of 249 beds within the Hospital. The highest portion of the Hospital is the Existing Patient Building, which is approximately 82 feet 3 inches.
- **Magnetic Resonance Imaging (MRI) Center:** The MRI Center is a freestanding building located north of the existing parking structure, along the northern portion of the Project Site. The MRI Center is approximately 2,560 square feet with an approximate height of 15 feet 8 inches.
- **Tarzana Garden Plaza:** The Tarzana Garden Plaza, which is located at the southwestern corner of the Project Site, contains approximately 39,019 square feet of medical and dental offices and a pharmacy. The Tarzana Garden Plaza is approximately 44 feet 5 inches in height.
- **Cube Medical Office Building:** The Cube Medical Office Building is located south of the existing parking structure in the southern portion of the Project Site. The Cube Medical Office Building, which is not operated by the Project Applicant, but is ground leased from the Project Applicant, contains approximately 65,878 square feet of medical offices and a pharmacy. The Cube Medical Office Building is approximately 100 feet 8 inches in height.
- **Modular Buildings:** Eight modular buildings are located along the northeastern part of the Project Site, fronting Burbank Boulevard and the US-101 freeway entrance. Seven of the eight modular buildings are referred to as Buildings A-G, while the remaining modular building is referred to as the Foundation Building. The modular buildings are occupied by uses that would generally be housed in the Hospital, but due to space constraints, are in the modular buildings. Building A houses the Case Management Department and is approximately 1,349 square feet of floor area. Building B consists of meetings rooms and restrooms and is approximately 2,698 square feet of floor area. Building C houses the Performance Improvement and Quality Departments and is approximately 1,349 square feet of floor area. Building D consists of office space for medical staff and is approximately 675 square feet of floor area. Building E houses volunteers and the Compliance and Service Excellence Departments and is approximately 570 square feet of floor area. Building F houses the Medical Records and Pathology Departments and is approximately 2,360 square feet of floor area. Building G houses the Spiritual Care Department and is approximately 584 square feet of floor area. The final modular building, the Foundation Building, which houses the Providence Tarzana Foundation offices,

is approximately 1,803 square feet of floor area. The modular buildings are approximately 15 feet 6 inches in height.

There are approximately 1,259 existing parking spaces on the Project Site. Parking is provided in an existing parking structure that includes approximately 596 parking spaces (Existing Parking Structure) and surface parking areas that include approximately 663 parking spaces. The Existing Parking Structure is approximately 37 feet in height.²

There are also several service buildings and facilities on the Project Site. Many of the patient rooms and support spaces within the Hospital are outdated and not appropriately sized. In addition, the Project Site's infrastructure and central utility plant are aging.

2. Land Use and Zoning

a. Encino–Tarzana Community Plan

The Project Site is located within Encino–Tarzana Community Plan (Community Plan) area. The Community Plan was adopted in December 1998. The Project Site is currently designated for Community Commercial land uses by the Community Plan.

b. Ventura/Cahuenga Boulevard Corridor Specific Plan

The Project Site is located within the Ventura/Cahuenga Boulevard Corridor Specific Plan (Specific Plan) area. The Specific Plan was adopted in December 1991 and was last amended in 2001.

c. City of Los Angeles Municipal Code

The Project Site is primarily zoned [Q]C2-1L (Qualified Commercial, Height District 1L), with portions of the Project Site zoned C2-1 (Commercial, Height District 1) and P-1 (Automobile Parking, Height District 1). The Commercial zone permits a wide array of land uses including hospitals and medical clinics, as well as uses customarily incident to any of these uses, and accessory buildings. The Parking zone allows public or private parking areas and parking buildings which are located entirely below the natural or finished grade. The Height District 1L designation within the C2 zone imposes a height limitation of six

² *Until February 2016, the Project Applicant rented 200 parking spaces located at the site of the Tarzana Medical Atrium, located at 5411 Etiwanda Avenue, Tarzana, CA 91356. However, those parking spaces are no longer available due to the construction of the new medical office building and parking structure at that site.*

stories or 75 feet and a maximum floor area ratio (FAR) of 1.5:1. Height District 1 within the C2 zone imposes a maximum FAR of 1.5:1. No above grade buildings are permitted in the P Zone.

3. Existing Project Site Improvements

The Project Applicant is currently in process with the Office of Statewide Health Planning and Development (OSHPD) to retrofit some of the existing structures to comply with certain seismic safety requirements of the Alfred E. Alquist Hospital Facilities Seismic Safety Act of 1994 (Senate Bill 1953). While not part of the Project, because construction approvals for this component are issued by OSHPD rather than by the City, a summary is provided below as part of the environmental setting for the Project. In addition, although not a part of the Project, other interior improvements and renovations occur on a frequent basis on the Project Site.

Senate Bill 1953 preempts local jurisdictions from the enforcement of all building standards published in the Title 24, California Building Standards Code relating to the regulation of hospital buildings. As codified in the California Health and Safety Code, local building jurisdiction plan review and construction inspection of hospital buildings is preempted in favor of OSHPD's authorization to review and inspect these facilities. The OSHPD is designated as the enforcing agency for these hospital buildings, including the plan checking and inspection of the design and details of the architectural, structural, mechanical, plumbing, electrical, and fire and panic safety systems, and the observation of construction.

As noted above, the Project Applicant is in process with OSHPD to seismically retrofit several existing buildings within the Hospital in order to comply with Senate Bill 1953. The Main Building, the Existing Patient Building, and the Ancillary Wing are required to comply with Senate Bill 1953's seismic specifications by January 1, 2020. The Project Applicant intends to complete seismic upgrades consisting of Structural Performance Category 4D³ and Nonstructural Performance Category 4⁴ upgrades in the Main Building

³ *Structural Performance Category 4D is a performance category assigned to existing nonconforming hospital buildings that have been demonstrated either by analysis or retrofit to be equivalent to the minimum prescriptive requirements of the 1979 Uniform Building Code including the California amendments (the 1980 California Building Code), in accordance with the California Building Code 2016 Section 3412A.2.3. Structural Performance Category 4D allows noncompliant buildings to go past the 2030 seismic compliance deadline.*

⁴ *Nonstructural Performance Category 4 is a performance category assigned to buildings that meet the criteria for Nonstructural Performance Category 3 and all architectural, mechanical, electrical systems, components and equipment, and hospital equipment meet the bracing and anchorage requirements of Part 2, Title 24. This category is for classification purposes of the Office of Emergency Services. The (Footnote continued on next page)*

and Ancillary Wing. This work, which would be implemented while keeping these buildings in service, allow hospitals to stay compliant with OSHPD requirements and to continue functioning through 2030 and beyond. In addition, the Project Applicant is currently processing OSHPD permits for Structural Performance Category 2⁵ upgrades and exterior enhancements in the Existing Patient Building.

D. Description of the Proposed Project

1. Project Overview

The Project proposes upgrades and enhancements to the Hospital totaling approximately 292,000 square feet, including the Lobby Enhancement and the addition of a new canopy (referred to herein as the Lobby Canopy), the D&T Expansion that would include a canopy (referred to herein as the D&T Canopy), and constructing the New Patient Wing that would include two canopy areas associated with the relocated and improved Emergency Department (referred to herein as the Walk-In Canopy and the ED Canopy). A new central utility plant would be located in the basement of the D&T Expansion. The Project would also include the construction of a new approximately seven-level⁶ above grade parking structure that would provide approximately 650 parking spaces. To provide for the proposed improvements, the Project would include removal of the existing pharmacy within the Hospital, eight modular buildings, and the MRI Center. The uses in these existing buildings to be removed, including the pharmacy, would be relocated to the Hospital. Certain service buildings and facilities on the Project Site also would be removed. A summary of the proposed development is provided in Table A-1 on page A-10 and a conceptual illustration of the Project is shown in Figure A-4 on page A-11.

As shown in Figure A-4, the proposed Lobby Enhancement would be constructed along the central portion of the Hospital where the existing lobby is located. The Lobby Enhancement would include the addition of approximately 20,000 additional square feet of floor area to the existing lobby of the Hospital. A new covered entry canopy and drop-off (Lobby Canopy) comprising approximately 5,000 square feet of floor area would also be added to the west of the Lobby Enhancement. The first floor of the Lobby Enhancement

deadline for seismic compliance is January 1, 2020 or 2030 depending on the seismic design category and extension request requirements.

⁵ *Structural Performance Category 2 is a performance category assigned to buildings in compliance with the pre-1973 California Building Standards Code or other applicable standards, but not in compliance with the structural provisions of Senate Bill 1953.*

⁶ *The New Parking Structure consists of a ground level and six additional levels. The top level is not a "story" pursuant to LAMC Section 12.03, because it does not have a roof or ceiling.*

Table A-1
Summary of Existing and Proposed Floor Area^a

Building	Existing (sf)	Proposed Demolition (sf)	Proposed Construction (sf)	Net New (sf)	Total with Project (sf)
Hospital	204,097	(4,000)	292,000 ^b	288,000	492,097
MRI Center	2,560	(2,560)	0	(2,560)	0
Tarzana Garden Plaza	39,019 ^c	0	0	0	39,019
Cube Medical Office Building	65,878	0	0	0	65,878
Modular Buildings	11,388	(11,388)	0	(11,388)	0
Total	322,942	(17,948)	292,000	274,052	596,994

sf = square feet

^a *Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. LAMC Section 12.03 defines floor area as “[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.”*

^b *The proposed Hospital includes a new approximately 225,000-square-foot New Patient Wing plus the 3,000-square-foot Walk-In Canopy and 6,000-square-foot ED Canopy; a 30,000-square-foot D&T Expansion and 3,000-square-foot D&T Canopy; a 20,000-square-foot Lobby Enhancement, and a 5,000-square-foot Lobby Canopy.*

^c *Existing floor area is estimated assuming 95 percent of gross building area (41,073 square feet).*

Source: Eyestone Environmental, 2016.

would include an entrance and lobby area for patients and visitors. The portion of the second floor above the Lobby Enhancement could accommodate an expansion of Hospital programs and operations. The Lobby Enhancement and the Lobby Canopy would improve the overall patient experience by creating a central entrance for the Hospital and a meeting and gathering space for patients, visitors, and other guests. The Lobby Enhancement would be approximately 35 feet in height. A new landscaped and shaded paseo would provide a walkway to connect the New Parking Structure and Existing Parking Structure to the Lobby Enhancement and Hospital.

As provided in Figure A-4 on page A-11, the proposed D&T Expansion would be constructed to the rear of the Hospital. The D&T Expansion would expand the existing diagnostic and treatment areas currently located in the Hospital’s Ancillary Wing and would include a canopy area. The D&T Expansion would comprise approximately 30,000 square feet plus an approximately 3,000-square-foot D&T Canopy. The D&T Expansion would reach approximately 45 feet in height.

The New Patient Wing, which would extend northwesterly from the rear of the Hospital, would replace the Existing Patient Building of the Hospital as the new location for

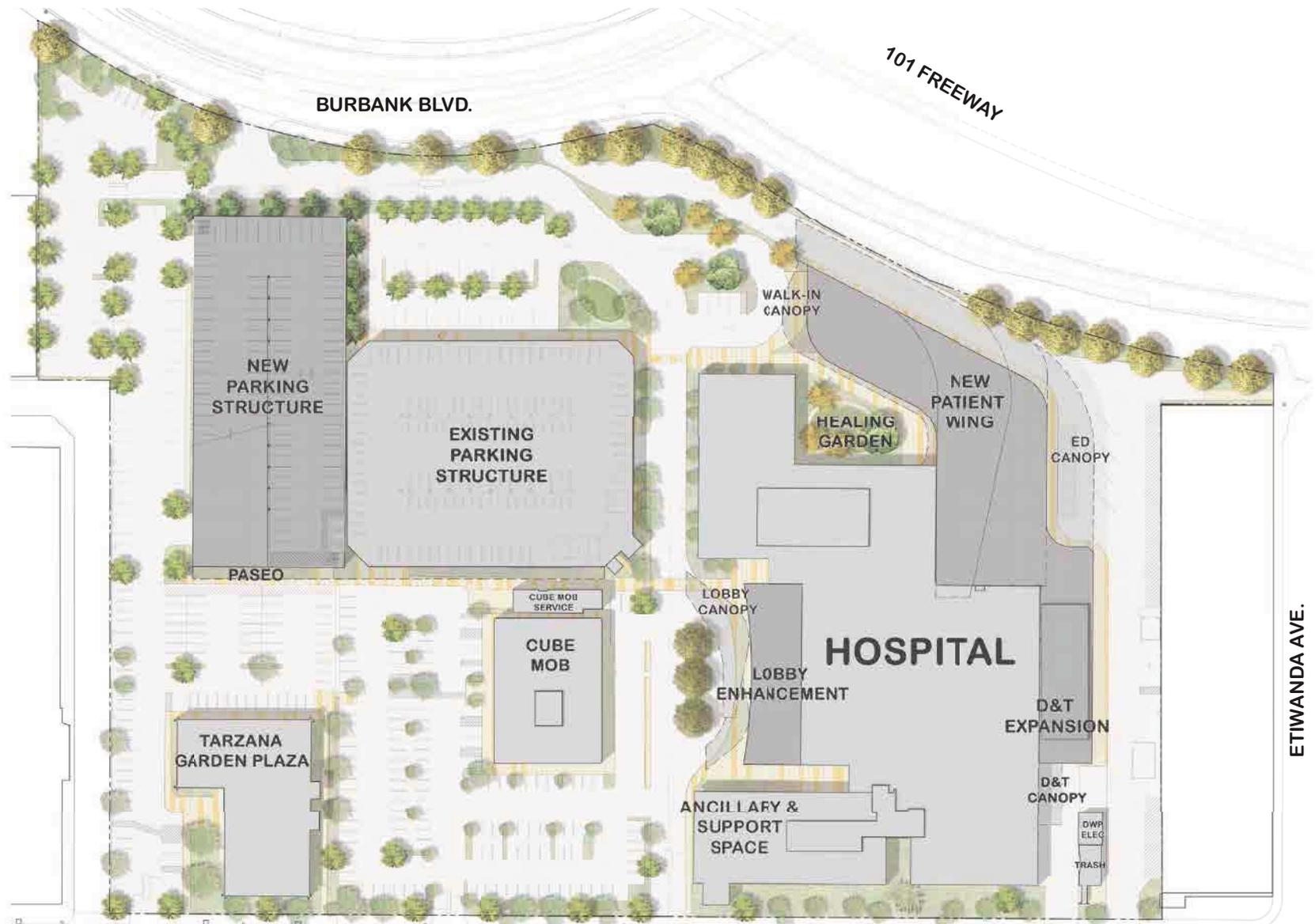


Figure A-4
 Conceptual Site Plan

the acute care inpatient beds. The Hospital currently has 249 acute care inpatient beds: 195 beds in the Existing Patient Building, 21 beds in the NICU located in the Main Building of the Hospital, and 33 beds in the Women's Pavilion. The Existing Patient Building rooms are small and contain both double and triple occupancy rooms. In contrast, the New Patient Wing would provide all single-occupancy rooms. The New Patient Wing would have a total of 190 acute care inpatient beds. Together with the 33 beds in the Women's Pavilion and 21 beds in the NICU located in the Main Building of the Hospital, the Project would result in a slight decrease in the number of acute care inpatient beds from 249 beds to 244 beds at the Hospital. As part of the Project, the New Patient Wing would also include a new, expanded Emergency Department, imaging and pediatrics facilities, and the inpatient pharmacy. The increase in square footage for the new buildings within the Medical Center is due to modern standard of care and current code requirements for hospitals, including increased space and additional functions in nursing units, diagnostic and treatment areas, emergency room, and support services.

The New Patient Wing would comprise approximately 225,000 square feet plus the Emergency Department Walk-In Canopy comprising approximately 3,000 square feet and the ED Canopy comprising approximately 6,000 square feet. The New Patient Wing would be six stories with an approximate height of 120 feet.⁷ In the 1970s, when the Hospital was originally constructed, hospital floor-to-floor heights were required to be approximately 12 feet. Modern code requirements include floor-to-floor heights of up to 17 feet. This floor-to-floor height increase is also required to accommodate advances in medical technology. During construction of the New Patient Wing, it is anticipated that many of the uses and functions in the modular buildings and the MRI Center would be temporarily relocated off-site as the buildings would need to be removed to accommodate construction of the New Patient Wing.

Upon completion of the New Patient Wing and relocation of the patients from the Existing Patient Building to the New Patient Wing, the Existing Patient Building would be converted to Ancillary & Support Space for the Hospital. The Ancillary & Support Space would consist of other medical center uses, but would not be used to house acute care inpatient beds. The uses and functions in Modular Buildings A–G and the Foundation Building are anticipated to be relocated into the Ancillary & Support Space.

The new central utility plant would be constructed in the basement of the D&T Expansion and would total approximately 8,000 square feet.

⁷ *The approximate height of 120 feet for the New Patient Wing includes mechanical equipment. Excluding mechanical equipment, the approximate height of the New Patient Wing is 100 feet 8 inches.*

As illustrated in Figure A-4 on page A-11, the Project also includes the construction of a new seven-level above grade parking structure that would provide approximately 650 parking spaces. The New Parking Structure would comprise approximately 270,000 square feet and would have an approximate height of 70 feet.

As part of the Project, the Project Applicant would subdivide the Project Site into three legal lots to account for current and future use. Proposed Lot 1 would contain the Hospital, the Existing Parking Structure, the New Parking Structure, and various surface parking spaces. Proposed Lot 2 would contain the Tarzana Garden Plaza and surrounding surface parking spaces. Proposed Lot 3 would contain the Cube Medical Office Building and surrounding surface parking spaces. The existing internal lot lines for seven lots on the Project Site are outdated, reflecting various subdivisions processed decades ago, but bearing no relation to the current and future use of the Project Site.

Overall, as summarized in Table A-1 on page A-10, the Project would remove approximately 17,948 square feet of existing floor area and construct approximately 292,000 square feet of new floor area, resulting in a net increase of approximately 274,052 square feet of net new floor area within the Project Site.

2. Project Design

With the addition of new components to the existing Medical Center, the design approach is intended to be complementary and appropriate to the scale and character of the existing Medical Center and surrounding community.

The additions to the Hospital, including the New Patient Wing, D&T Expansion, and Lobby Enhancement would provide visual interest through horizontal and vertical articulation while maintaining consistency with the existing Hospital in its exterior building skin. An outdoor garden is planned between the Walk-In Canopy of the New Patient Wing and the existing Hospital. The proposed approximately 5,700-square-foot outdoor garden (referred to as the Healing Garden) would also offer patients, visitors, and staff an additional landscaped area within the Project Site.

The maximum building height would be approximately 120 feet above grade level, including rooftop penthouses and mechanical screens. Building materials could include concrete, stucco, aluminum, glass, concrete block, terracotta cladding, pre-finished wall panel, and prefinished metal. Building façades would include transparent glass and exterior louvers along with sunshades on the interior of the building. Additionally, most major utilities would be placed underground.

The New Parking Structure would be designed to substantially screen automobiles in the garage. The façade design would differ from the hospital and medical office buildings, but would be complementary with the aesthetics of the existing and proposed buildings within the Project Site. The New Parking Structure would include landscaping around the perimeter and would be designed to include trees, shrubs, flowers, and vines.

3. Access, Circulation, and Parking

As shown in Figure A-3 on page A-5, existing vehicular access to the Project Site is provided along Burbank Boulevard and Clark Street. The Project would maintain the existing vehicular access to the Project Site. Public (non-emergency) access would continue to be provided from the west driveways on Burbank Boulevard and Clark Street. Public (emergency) access would be provided from the west driveway on Burbank Boulevard. In addition, ambulance access would be provided from the east driveway on Burbank Boulevard and along Clark Street. Service access would be provided from the east driveway on Clark Street. Pedestrian access would be provided throughout the Project Site from Burbank Boulevard and Clark Street.

As previously described, the Project Site currently provides 1,259 parking spaces, including 596 parking spaces within the Existing Parking Structure and 663 parking spaces provided in various surface parking areas throughout the Project Site. Some existing surface parking spaces would be removed to accommodate the new Project buildings. As part of the Project, additional parking would be provided in a new above grade parking structure within the western portion of the Project Site. The seven-level parking structure would provide 650 parking spaces. The Project would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the New Parking Structure. Once the Project is completed, 1,611 parking spaces would be provided on-site.

The Project would also provide bicycle parking spaces in compliance with the LAMC. Short-term bicycle parking spaces would be located near the pedestrian entrances to the Lobby Enhancement and the Emergency Department Walk-In Canopy entrance of the New Patient Wing. Long term bicycle parking spaces would be located on the ground level of the New Parking Structure. A new landscaped and shaded paseo would provide a walkway to connect the New Parking Structure and Existing Parking Structure to the Lobby Enhancement and Hospital.

4. Landscaping and Open Space

The Project would provide new landscaping and trees throughout the Project Site to buffer hospital uses, enhance the overall patient experience, and enhance green space in

the neighborhood. The Project would retain the existing landscaped buffer along Clark Street. In addition, the Project would add a landscaped buffer along Burbank Boulevard that would include Coast Live Oak trees. Landscaping and open space areas would be sustainable and water-efficient and would include a plant palette containing a mixture of California native and Mediterranean low water use plants. In addition, the Project Applicant would plant 89 new trees on the Project Site.

Landscaping on the Project Site would include new courtyards in order to provide additional gathering areas for employees and patients and their visitors. The Healing Garden, which is planned between the Walk-In Canopy of the New Patient Wing and the existing Hospital, would also offer patients, visitors, and staff an additional landscaped area. The New Parking Structure would be designed to substantially screen automobiles in the garage from view by pedestrians and adjacent buildings. A new landscaped and shaded paseo would provide a walkway to connect the New Parking Structure and Existing Parking Structure to the Lobby Enhancement and Hospital.

5. Lighting and Signage

Lighting on the Project Site would include low-level interior lighting adjacent to buildings, parking structures, surface parking areas, and along pathways for security and wayfinding purposes. In addition low-level lighting to accent signage, architectural features, and landscaping elements would be installed throughout the Project Site. The proposed lighting sources would be similar to other lighting sources in the vicinity of the Project Site and would not generate artificial light levels that are out of character with the surrounding area, which is densely developed and characterized by a high degree of human activity during the day and night. On-site exterior lighting would be shielded or directed toward the areas to be lit to limit light spillover onto off-site uses and would meet all applicable LAMC lighting standards.

Signage on the Property would be designed to be aesthetically compatible with the existing and proposed architecture of the Property. New signage would be architecturally integrated into the design of the buildings and would establish appropriate identification for the medical uses. Project signage would include monument signage, building, and general ground level and wayfinding pedestrian signage. Project signage would be illuminated by means of low-level external lighting, internal halo lighting, or ambient light. Exterior lights would be directed onto signs to minimize off-site glare. In accordance with the LAMC, illumination used for project signage would be limited in light intensity to avoid negative lighting impacts to the nearest residentially zoned property.

6. Security Features

As part of the operation of the Providence Tarzana Medical Center, the Project Applicant has developed and currently implements safety standards and procedures for patients, visitors, employees, volunteers, and medical staff. These standards provide for the implementation of a variety of programs for the safety of those who enter the Project Site, including quarterly inspections of all areas, ongoing staff training, and monthly employee Safety and Disaster Newsletters. The Project Applicant also maintains 24-hour security operations and patrol using contract and in-house staff, provides an excess of 60 security cameras monitoring grounds and interior hospital space, and implements disaster drills and hospital lock downs at least once a year for staff training. The Project Applicant has also developed written plans for hazardous materials and waste management, fire safety, medical equipment, and utility systems. The Project Applicant's existing safety standards and procedures would continue to be implemented with construction of the Project and updated as needed.

7. Sustainability Features

The Project would integrate sustainable and green building techniques. Various standards and guidelines would be used to reduce resources and energy consumption, encourage water and solid waste recycling, integrate renewable energy generation, enable rainwater capture, support walking and other healthful lifestyle activities, and support occupant and environmental health. The design, construction, and operation of the Project, as appropriate for a healthcare setting within the regulatory framework of the OSHPD and the Department of Public Health, would focus on the following areas:

a. Reduce Energy Demand

- Systems designed to reduce energy demand to achieve an Energy Use Index below the regional average for hospitals. Examples of design methods and technologies that could be implemented may include centralized chiller plant with rooftop ventilation, high-performance glazing on windows, appropriately oriented shading devices, high-efficiency HVAC systems and boilers, LED lighting systems, and enhanced insulation to minimize solar and thermal gain.

b. Renewable Energy Sources

- Evaluate the inclusion of on-site renewable energy in the Project, as financially feasible.
- Future access and space for electrical solar systems to take advantage of developing technology.

c. System Performance

- Commissioning of building energy systems to verify that the Project's buildings' energy systems are properly installed and calibrated, and perform to the Project's energy requirements.

d. Water

- Reduction of total water consumption for the Project through design of systems and selection of equipment.
- Comply with the requirements of the City's Standard Urban Stormwater Mitigation Plan and rainwater Low Impact Development strategies.
- During construction, comply with the Stormwater Pollution Prevention Plan approved for the Project to control stormwater runoff and minimize pollutant loading and erosion effects.

e. Net-Zero Waste

- At least 75 percent of construction and demolition debris from project construction would be diverted from landfills.

f. Material Health and Sourcing

- The Project design would prioritize material health and avoid building products that are harmful to humans, animals, and the environment when healthier alternatives are available. Strategies include reducing or eliminating the use of PBT sources, mercury, lead, cadmium, copper, dioxins, halogenated compounds, halogenated flame retardants and phthalates.
- The Project would prioritize local and regional materials made from sustainably sourced, recycled, and recyclable or rapidly renewable feedstocks. Examples include fly ash in concrete, materials extracted and manufactured within 500 miles of the site, and materials with high values of recycled content with a prioritization on post-consumer recycled content.
- Use of rapidly renewable materials. Using only Forest Stewardship Council (FSC)-certified wood for interior and exterior applications, to support environmentally responsible forest management.

E. Project Construction and Scheduling

Project construction is anticipated to be completed as early as 2022 to 2025. Construction of the Project would commence with removal of the existing buildings (i.e., eight modular buildings and MRI Center), followed by grading and excavations. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. The Project would require excavations up to 23 feet below ground surface. It is estimated that approximately 44,000 cubic yards of soil would be hauled from the Project Site. Construction hours would occur Monday through Saturday in accordance with the LAMC. Construction hours could extend beyond these hours if required and specifically permitted by the City. The haul route to and from the Project Site is anticipated to be from the US-101 via Reseda Boulevard, Burbank Boulevard, and Clark Street. Inbound haul trucks would exit the US-101, head south on Reseda Boulevard, turn east on Burbank Boulevard, and enter the Project Site from the north. Outbound haul trucks would exit the Project Site to the south by turning west on Clark Street, then turn north on Reseda Boulevard, and either continue on Reseda Boulevard to enter the US-101 heading west or turn east on Burbank Boulevard to enter US-101 heading east.

During construction of the Project, certain of the Medical Center's operations may be temporarily moved to a nearby off-site location to be identified by the Project Applicant.

F. Necessary Approvals

The City of Los Angeles has the principal responsibility for approving the Project. OSHPD has the principal responsibility. Approvals required for development of the Project include, but are not limited to, the following:

- Pursuant to California Government Code Section 65356 and LAMC Section 11.5.6, a General Plan Amendment to permit the Project as proposed by amending the General Plan Land Use Map, Encino–Tarzana Community Plan to add footnote 14 to Community Commercial Land Use, because otherwise the New Patient Wing height of six stories and 120 feet would be inconsistent with the maximum height of six stories and 75 feet otherwise permitted;
- Pursuant to California Government Code Sections 65453 and 65356 and LAMC Section 11.5.7 G, a Specific Plan Amendment to the Ventura/Cahuenga Boulevard Corridor Specific Plan to permit the Project as proposed. This is most readily accomplished by amending the Specific Plan boundary in the Specific Plan at Plan Designations, Map 5—Tarzana Section and Pedestrian Oriented Areas, Exhibit B—Tarzana Section to exclude the Property, because otherwise

the height, FAR, and other provisions of the Specific Plan would not allow for the Project,⁸

- Pursuant to LAMC Sections 12.32 Q and 12.32 F, a Vesting Zone and Height District Change of the P-1 zoned portion of the Property to C2-1 to permit the New Parking Structure;
- Pursuant to LAMC Sections 12.32 Q and 12.32 F, a Vesting Zone and Height District Change of the [Q]C2-1L zoned portion of the Property to C2-1 to permit the following:
 - Change Height District 1L to Height District 1 to permit the New Patient Wing height of six stories and 120 feet;
 - Remove the existing [Q] conditions to permit the Project as proposed, including the New Patient Wing and other structures, the Project's FAR, and other Project components that may be inconsistent with the [Q] conditions;
- Pursuant to LAMC Section 12.24.U.14, a Major Development Project Conditional Use Permit for a development that creates 100,000 square feet of floor area or more in the C2 zone;
- Pursuant to LAMC Section 17.15.A, a Vesting Tentative Tract Map, including a haul route approval.
- Other discretionary and ministerial permits and approvals that will or may be required, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

OSHPD has the principal responsibility for approving the Hospital portion of the Project. Approvals required for development of the Hospital include, but are not limited to, building permits for the Hospital.

⁸ *The Specific Plan was initially adopted in 1991, prior to construction of many buildings in the area which are inconsistent with the Specific Plan's height, FAR, and other limitations.*

B. Explanation of Checklist Determinations

Attachment B: Explanation of Checklist Determinations

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist. The responses below indicate those issues that are expected to be addressed in an environmental impact report (EIR) and demonstrate why other issues would not result in potentially significant environmental impacts and thus do not need to be addressed further in an EIR. The questions with responses that indicate a “Potentially Significant Impact” do not presume that a significant environmental impact would result from the Project. Rather, such responses indicate those issues that will be addressed in an EIR with conclusions of impact reached as part of the analysis within the EIR.

I. Aesthetics

Would the project:

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

Potentially Significant Impact. A scenic vista is a view of a valued visual resource. Scenic vistas generally include views that provide visual access to large panoramic views of natural features, unusual terrain, or unique urban or historic features, for which the field of view can be wide and extend into the distance, and focal views that focus on a particular object, scene, or feature of interest. Visual resources in the vicinity of the Project Site include the Santa Susana Mountains to the distant north and the Santa Monica Mountains to the south of the Project Site. Scenic vistas of the visual resources in the vicinity of the Project Site are primarily available from area roadways. In particular, intermittent views of the Santa Monica Mountains may be available along Burbank Boulevard when looking south across the Project Site. As discussed in Attachment A, Project Description, of this Initial Study, the Project consists of improvements to the existing Providence Tarzana Medical Center. The heights of the proposed new buildings would range in height up to a maximum height of approximately 120 feet. The new buildings could potentially be visible within scenic vistas of valued visual resources that are available from locations in the vicinity of the Project Site. Therefore, the EIR will provide further analysis of the Project’s potential impacts to scenic vistas.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a state scenic highway?

No impact. The nearest eligible scenic highway is along the 101 Freeway, approximately 4.23 miles west of the Project Site,¹ and the nearest City-designated scenic parkway is along Mulholland Drive, approximately 2.72 miles south of the Project Site.² The Project Site is not located along a City-designated scenic highway. Notwithstanding, the Project Site does not include any scenic resources. Specifically, the Project Site is currently improved with a hospital and medical office buildings associated with the Providence Tarzana Medical Center. As shown in the Tree Report for the Project included in Appendix IS-1 of this Initial Study, the Project Site does not include protected trees. In addition, the Project Site does not include rock outcroppings, or other natural features. Furthermore, none of the buildings within the Project Site are considered historic resources. Therefore, the Project would not substantially damage scenic resources, including those located within a City-designated scenic highway. As such, the Project would not result in an impact to scenic resources within a City-designated scenic highway, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Potentially Significant Impact. As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is located in a highly urbanized area characterized primarily by low- to mid-rise buildings of varying heights that are occupied by office, commercial, and residential uses. While the proposed buildings would be anticipated to be similar and compatible with the existing visual character and quality of the surrounding area, the Project would change the visual character of the Project Site and its surroundings with the development of new buildings and a parking structure on the Project Site. In addition, the New Patient Wing would feature a height of approximately 120 feet, which would increase the height within the Project Site. Therefore, the EIR will provide further analysis of the Project's potential impacts on visual character and quality.

¹ *California Scenic Highway Mapping System, Los Angeles County, www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed April 4, 2016.*

² *Los Angeles General Plan Transportation Element, Map A3, Highways and Freeways—South Valley Subarea, <http://planning.lacity.org/cwd/gnlpln/transelt/TEMaps/A3SVly.gif>, accessed April 4, 2016.*

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

Potentially Significant Impact. The Project Site currently generates moderate levels of artificial light and glare typical of hospitals. Light sources include low-level security lighting, vehicle headlights, interior lighting emanating from the existing buildings on the Project Site, and architectural lighting. Glare sources include glass and metal vehicle and building surfaces. The Project would introduce new sources of light and glare that are typically associated with hospitals, including architectural lighting, signage lighting, interior lighting, security, and wayfinding lighting. Furthermore, the Project would include new buildings and a parking structure, which would introduce nighttime lighting and have the potential to shade adjacent land uses. Therefore, the EIR will provide further analysis of the Project's potential impacts regarding light, glare, and shading.

II. Agriculture and Forest 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. 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?

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is currently developed with a hospital and medical office uses. In addition, the uses surrounding the Project Site include public facilities (US-101), office, medical office, commercial, and residential uses. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency

Department of Conservation.³ As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is primarily zoned by the Los Angeles Municipal Code (LAMC) as [Q]C2-1L (Qualified Commercial, Height District 1L), with portions of the Project Site zoned C2-1 (Commercial, Height District 1), and P-1 (Automobile Parking, Height District 1). The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.⁴ Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR 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 previously discussed, the Project Site is located in an urbanized area and is currently developed with a hospital and medical office uses. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for commercial and automobile parking uses. The Project Site is not zoned for forest land and is not used as forest land.⁵ Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

³ City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report*, <http://zimas.lacity.org/>, accessed February 24, 2016.

⁴ *Ibid.*

⁵ *Ibid.*

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

No Impact. As previously discussed, the Project Site is located in an urbanized area and does not include any forest land or timberland. Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR 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. The Project Site is located in an urbanized area of the City of Los Angeles and does not include farmland. The Project Site and surrounding area are not mapped as farmland, are not zoned for farmland or agricultural use, and do not contain any agricultural uses.⁶ As such, the Project would not result in the conversion of farmland to non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

III. Air Quality

Where available and applicable, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

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

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (the Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM_{2.5}], and lead⁷). The SCAQMD's 2012 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments

⁶ *Ibid.*

⁷ *Partial Nonattainment designation for the Los Angeles County portion of the Basin only.*

(SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.⁸ With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG’s planning area.

Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on the SCAQMD’s implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project’s consistency with the SCAQMD’s AQMP.

With regard to the Project’s consistency with the Congestion Management Program (CMP) administered by the Metropolitan Transportation Authority (Metro), see Response to Checklist Question XVI.b, Transportation/Circulation, below.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Potentially Significant Impact. The Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Construction-related pollutants would be associated with sources such as construction worker vehicle trips, the operation of construction equipment, site grading and preparation activities, and the application of architectural coatings. During project operation, air pollutants would be emitted on a daily basis from motor vehicle travel, natural gas consumption, and other onsite activities. Therefore, the EIR will provide further analysis of the Project’s construction and operational air pollutant emissions.

c. 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Potentially Significant Impact. As discussed above, construction and operation of the Project would result in the emission of air pollutants in the Basin, which is currently in

⁸ SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

non-attainment of federal air quality standards for ozone, PM_{2.5} and lead, and State air quality standards for ozone, PM₁₀, and PM_{2.5}. Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. Therefore, the EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

d. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. As discussed above, the Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential uses to the east of the Project Site. Therefore, the EIR will provide further analysis of the Project's potential to result in substantial adverse impacts to sensitive receptors.

e. Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402.

With respect to project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. In addition, onsite trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Based on the above, the potential odor impact during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

IV. Biological Resources

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?**

Less Than Significant Impact. The Project Site is located in an urbanized area and is currently developed with a hospital and medical office uses. Ornamental trees and landscaping exist on portions of the Project Site. Due to the improved nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur onsite are limited to small terrestrial and avian species typically found in developed settings. Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently developed with a hospital and medical office uses. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area. Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

- c. **Have a substantial adverse 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?**

No Impact. The Project Site is located in an urbanized area and is currently developed with a hospital and medical office uses. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity of the Project Site. As such, the Project would not have an adverse

effect on federally protected wetlands. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR 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?

Less Than Significant Impact. As described above, the Project Site is located in an urbanized area and is currently developed with a hospital and medical office uses. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site which provide linkages to natural open spaces areas and which may serve as wildlife corridors. Accordingly, development of the Project would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity of the Project Site. Notwithstanding, although unlikely, the existing onsite trees that would be removed during construction of the Project could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act, which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. In accordance with the Migratory Bird Treaty Act, tree removal activities would take place outside of the nesting season (February 15–September 15), if and to the extent feasible. To the extent that vegetation removal activities must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a 300-foot buffer (500 feet for raptors) would be established until the fledglings have left the nest. With compliance with the Migratory Bird Treaty Act, the impact would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The City's protected tree regulations in Section 17.05.R of the LAMC (the Tree Regulations) regulate the relocation or removal of specified protected trees, which include all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least four inches in diameter at breast height. A survey of the existing trees onsite and a review of the proposed development relative to the existing location of the onsite trees were conducted by The Tree Resource in June 2016. The results of the survey and review of the proposed development are provided in the Tree Report for the Project included in

Appendix IS-1 of this Initial Study. As discussed in the Tree Report, none of the tree species found within the Project Site are protected under the Tree Regulations.

With regard to non-protected trees, the Project Site includes approximately 180 ornamental trees of at least eight inches in diameter at breast height. Of those trees, approximately 89 trees would be removed as part of the Project. The trees to be removed include canary pine, carrotwood, crepe myrtle, queen palm, western sycamore, eucalyptus, xylosma, London plane tree, evergreen pear, and jacaranda trees that range in size from eight inches to 32 inches in diameter at breast height. The remaining 91 trees would be retained and would be protected during construction of the Project.

Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR 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 is located in an urbanized area and is currently developed with a hospital and medical office uses. As previously described, ornamental trees and limited ornamental landscaping exist on portions of the Project Site. The Project Site does not support any habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

V. Cultural Resources

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

No Impact. Section 15064.5 of the CEQA Guidelines generally defines a historic resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). In addition, any object, building,

structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register.

As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is currently developed with several buildings, including the Hospital, MRI Center, Tarzana Garden Plaza, Cube Medical Office Building, and eight modular buildings. The existing MRI Center, which was built in approximately 1990, and eight modular buildings would be removed as part of the Project. Given the age of the MRI Center, its undistinguished design, and its lack of association with any important event or activity, the existing MRI Center is not considered a historical resource. Similarly, the Hospital, which was built between 1972 and 1975, features an undistinguished design and is not known to be associated with any important event or activity. Therefore, the Hospital is also not considered a historical resource. In addition, a records search was conducted for the Project by the South Central Coastal Information Center (the SCCIC) at California State University, Fullerton to identify previously recorded prehistoric and historic resources in and around the Project Site (see Appendix IS-2 of this Initial Study). The records search includes a review of all recorded archeological sites within a 0.5-mile radius of the Project Site as well as a review of cultural resource reports on file. The California Points of Historical Interest, California Historical Landmarks, California Register of Historical Resources, National Register of Historic Places, California State Historic Resources Inventory, and City of Los Angeles Historic-Cultural Monuments listings were also reviewed for the Project Site. The records search indicates that there are no historic resources located on the Project Site. Furthermore, based on a Historic Places LA search, the closest identified historic resource is a low-rise commercial building located west of the Project Site, along Burbank Boulevard at 18455 West Burbank Boulevard. The Project would not demolish that commercial building, nor would the Project require street widening that would otherwise affect the integrity of the building. As such, no impacts to historic resources would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be

likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area of the City of Los Angeles and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Furthermore, the records search conducted for the Project Site by the SCCIC (see Appendix IS-2 of this Initial Study) indicates that there are no known archaeological resources on the Project Site or within a 0.5-mile radius of the Project Site.

However, the records search conducted for the Project Site by SCCIC states that based on the known archaeological sensitivity in the surrounding area, buried prehistoric or historic cultural resources may be present. Furthermore, as the Project would require excavation of approximately 44,000 cubic yards of soil at a depth of approximately 23 feet below ground surface, there is a possibility that archeological artifacts that were not recovered during prior construction or other human activity may be present. Therefore, in the event any archaeological materials are unexpectedly encountered during construction, work in the area would cease and deposits would be required to comply with the regulatory standards set forth in Section 21083.2 of the California Public Resources Code and Section 15064.5(c) of the CEQA Guidelines, including a determination of whether any such potential unique archaeological resource would be preserved in place or left in an undisturbed state. Therefore, as compliance with the regulatory standards in Section 21083.2 and Section 15064.5(c) would ensure the appropriate treatment of any potential unique archaeological resources unexpectedly encountered during grading and excavation activities, the Project's impact on archaeological resources would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant with Mitigation Incorporated. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Section 5097.5 of the California Public Resources Code specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

Based on the records search conducted by the Natural History Museum, included in Appendix IS-2 of this Initial Study, there are no fossil localities that lie directly within the

boundaries of the Project Site. However, the records search indicates that within the greater vicinity of the Project Site, there are fossil localities at depth in similar sediments as those underlying the Project Site. The closest identified locality in proximity to the Project Site is LACM 3822, which is located approximately 4.09 miles east of the Project Site, near Kester Avenue and Sepulveda Boulevard north of Oxnard Street. This locality produced fossil specimens of extinct peccary (*Platygonus*), camel (*Camelops*), and bison (*Bison*) at depths between 75 and 100 feet below the surface. The next closest identified localities is LACM 6208, which is located approximately 4.28 east of the Project Site, along Kester Avenue near Burbank Boulevard. These localities produced a fossil specimen of extinct bison (*Bison*) at a depth of 20 feet below the surface. An additional locality is LACM 3263 near the intersection of Kester Avenue and Otsego Street, approximately 4.31 miles southeast of the Project Site, which produced specimens of extinct horse (*Equus*) at a depth of 14 feet below the surface. Approximately 4.37 miles southwest of the Project Site, between Topanga Canyon Road and Mulholland Highway, locality LACM 1213 produced a fossil specimen of horse (*Equus*) and ground sloth (*Paramylodon*).

While the Project Site has been subject to grading and development in the past, the Project would require excavation of approximately 44,000 cubic yards of soil at a depth of 23 feet below ground surface. According to the records search by the Natural History Museum, shallow grading or shallow excavations in the younger Quaternary Alluvium exposed throughout the Project Site are unlikely to provide significant fossil vertebrate remains. However, deeper excavations in the Project Site that extend down into older Quaternary deposits, may well encounter significant vertebrate fossils. According to the Geotechnical Memorandum provided in Appendix IS-3, of this Initial Study, the older Quaternary deposits may be encountered between the artificial fill (0 to 4.5 feet below ground surface) and the Tertiary Modelo Formation Bedrock (50 feet below ground surface). As the Project is estimated to have excavations up to 23 feet below ground surface, the Project may encounter significant vertebrate fossils. Therefore, the following mitigation measure is recommended to ensure that the Project's potential impact on paleontological resources is addressed:

Mitigation Measure V-1: If any paleontological materials are encountered during the course of Project development, work in the area shall be halted. The services of a qualified paleontologist shall be secured by contacting the Los Angeles County Natural History Museum to assess the resources. In addition, a report on the paleontological findings shall be prepared by the qualified paleontologist and a copy of the paleontological report shall be submitted to the Los Angeles County Natural History Museum.

With implementation of the above mitigation measure, Project impacts on any previously undiscovered paleontological resources would be less than significant. No further analysis of this topic in an EIR is required.

The Project Site does not include any known unique geologic features and no unique geologic features are anticipated to be encountered during construction of the Project. Therefore, the Project would not directly or indirectly destroy a unique geologic feature. The impact associated with unique geologic features would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

d. Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75, §5097.98, and Health and Safety Code §7050.5(b))?

Less Than Significant Impact. Although no human remains are known to have been found based on previous development on the Project Site, there is the possibility that unknown resources could be encountered during construction of the Project, particularly during ground-disturbing activities such as excavation and grading. While the uncovering of human remains is not anticipated, if human remains are discovered during construction, such resources would be treated in accordance with State law, including Section 15064.5(e) of the CEQA Guidelines, Section 5097.98 of the California Public Resources Code and Section 7050.5 of the California Health and Safety Code. Specifically, if human remains are encountered, work on the portion of the Project Site where remains have been uncovered would be suspended and the City of Los Angeles Public Works Department and the County Coroner would be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission would be notified within 24 hours, and the guidelines of the Native American Heritage Commission would be adhered to in the treatment and disposition of the remains. Compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. Therefore, the Project's impact on human remains would be less than significant and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

- e. Cause a substantial adverse change in the significance of a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or determined eligible for listing on the California register of historical resources, listed on a local historical register, or otherwise determined by the lead agency to be a tribal cultural resource?⁹**

Potentially Significant Impact. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, 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 or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. 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.

As discussed above, the Project would require excavation of approximately 44,000 cubic yards of soil at a depth of approximately 23 feet below ground surface. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes and the Project will participate in any requested consultations. Further analysis of this topic will be provided in the EIR.

VI. Geology and Soils

The following analysis is based, in part, on the *Preliminary Summary of Site Geology and Geologic/Seismic Hazards* (Geotechnical Memorandum) prepared for the Project by Leighton Consulting, Inc., dated April 2016. This report is included as Appendix IS-3 of this Initial Study.

Would the project:

⁹ This checklist question language, based on Office of Planning and Research (OPR) guidance, is being used to address Tribal Cultural Resources as required by Assembly Bill 52. However, the language is still under draft form.

- a. Expose people or structures to 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.**

Potentially Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City of Los Angeles designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

As discussed in the Geotechnical Memorandum, the Project Site is not located within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards. In addition, the Project Site is not located within a City-designated Fault Rupture Study Area.¹⁰ According to the Geotechnical Memorandum, based on the United States Geological Survey fault parameters data base, the closest active fault to the Project Site is the Verdugo fault, located approximately 8.9 miles east of the Project Site. However, further analysis of this topic will be provided in the EIR.

¹⁰ *Los Angeles General Plan Safety Element, Exhibit A, Alquist-Priolo Special Study Zones & Fault Rupture Study Areas (November 1996), p. 47.*

ii. Strong seismic ground shaking?

Potentially Significant Impact. The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. Further analysis of this potential impact will be provided in the EIR.

iii. Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their shear strength due to excess water pressure that builds up during repeated seismic shaking. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials.

Although both Exhibit B to the City of Los Angeles General Plan (General Plan) Safety Element and the City's Zoning Information and Map Access System identify the Project Site within a liquefiable area,^{11,12} the Geotechnical Memorandum states that as the groundwater level is not anticipated to rise above 50 feet below ground surface, the potential for liquefaction at the Project Site is deemed to be low. It is noted that the Project would require excavations up to 23 feet below ground surface and would be well above 50 feet. Furthermore, the Project Site did not experience liquefaction during the 1994 Northridge earthquake, which induced a recorded peak ground acceleration of 0.52g for the Project Site and which was greater than the design basis peak ground acceleration of 0.41g for the Project Site. Nevertheless, as the potential for seismic activity exists, the EIR will include a more detailed analysis of this issue.

iv. Landslides?

Less Than Significant Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and generally characterized by flat topography. In addition, as discussed in the Geotechnical Memorandum and based on the State of California Seismic Hazards

¹¹ *Los Angeles General Plan Safety Element, Exhibit B, Areas Susceptible to Liquefaction (November 1996), p. 49.*

¹² *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed February 24, 2016.*

Map, Canoga Park Quadrangle, the Project Site is not located in a landslide area as mapped by the State,¹³ nor is the Project Site mapped as a landslide area by the City of Los Angeles.^{14,15} Furthermore, the development of the Project does not require substantial alteration to the existing topography. Therefore, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, potential impacts associated with landslides would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact. Development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. In addition, as discussed below under Checklist Question IX, Hydrology and Water Quality, the Project would require an erosion control plan to be approved by the Los Angeles Department of Building and Safety, as well as a Storm Water Pollution Prevention Plan pursuant to National Pollutant Discharge Elimination System permit requirements. Therefore, the EIR will include a more detailed analysis of this issue.

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?

Potentially Significant Impact. As discussed above, although both Exhibit B to the General Plan Safety Element and the City's Zoning Information and Map Access System identify the Project Site within a liquefiable area,^{16,17} the Geotechnical Memorandum states that as the groundwater level is not anticipated to rise above 50 feet below ground surface,

¹³ California Geological Survey. *Earthquake Zones of Required Investigation, Canoga Park Quadrangle*, released February 1, 1998, http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_canpk.pdf, accessed February 24, 2016.

¹⁴ Los Angeles General Plan Safety Element, Exhibit C, *Landslide Inventory & Hillside Areas* (November 1996), p. 51.

¹⁵ City of Los Angeles Department of City Planning, ZIMAS, *Parcel Profile Report*, <http://zimas.lacity.org/>, accessed February 24, 2016.

¹⁶ California Geological Survey. *Earthquake Zones of Required Investigation, Canoga Park Quadrangle*, released February 1, 1998, http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_canpk.pdf, accessed February 24, 2016.

¹⁷ City of Los Angeles Department of City Planning, ZIMAS, *Parcel Profile Report*, <http://zimas.lacity.org/>, accessed April 1, 2016.

the potential for liquefaction is deemed to be low. It is noted that the Project would require excavations up to 23 feet below ground surface and would be well above 50 feet. In addition, the Project Site is not located in a landslide area as mapped by the City, or within an area identified as having a potential for slope instability. Notwithstanding, the Project Site is susceptible to ground shaking and may contain soils that are unstable. Therefore, this issue will be evaluated further in the EIR.

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

Potentially Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. As discussed in the Geotechnical Memorandum, based on the geotechnical exploration performed on the Project Site, the near surface onsite soils are generally granular with localized sandy silt to clay layers. The majority of the near surface onsite soils are granular and have low expansion potential. Nevertheless, the EIR will include a more detailed analysis of this issue.

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?

No Impact. The Project Site is located within a community served by existing sewage infrastructure. The Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

VII. Greenhouse Gas Emissions

Would the project:

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

Potentially Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere affects the earth's temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction

strategies for greenhouse gas emissions in California. Activities associated with the Project, including construction and operational activities, would result in greenhouse gas emissions. Therefore, the EIR will provide further analysis of the Project's greenhouse gas emissions.

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

Potentially Significant Impact. As the Project would have the potential to emit greenhouse gases, the EIR will include further evaluation of project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (e.g., Assembly Bill 32 and the City of Los Angeles Green Building Code).

VIII. Hazards and Hazardous Materials

Would the project:

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

Potentially Significant Impact. The types and amounts of hazardous materials that would be used for development of the Project would be typical of those used during construction activities and those used for medical uses similar to existing operations. Specifically, construction of the Project would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. Operation of the Project would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. However, biohazardous and radioactive wastes generated from onsite operations would be involved in the operation of the Project. Thus, the potential exists for the Project to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, further analysis of this topic will be included in an EIR.

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?

Potentially Significant Impact. The Project would require the demolition of the MRI Center and the eight modular buildings. The Project would also involve limited construction in some areas of the Hospital in order to accommodate the relocation of certain uses to/from/within the Hospital. The MRI Center was built in 1990 and the Hospital

was built between 1972 and 1975. Based on the age of the Hospital, there is a potential for demolition debris to potentially contain asbestos containing materials and a potential for lead-based paint to be present. Therefore, further analysis of this topic will be included in an EIR.

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

No impact. The Project Site is not located within 0.25 mile of an existing or proposed school. The nearest schools to the Project Site include International School of Los Angeles/Lycée International, located approximately 0.50 mile from the Project Site at 5933 Lindley Avenue, and Gaspar De Portola Middle School, located approximately 0.60 mile from the Project Site at 18720 Linnet Street. Therefore, the Project would not create a significant hazard to nearby schools. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR 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?

Potentially Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a “list” of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a “list,” many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred. The database provides a listing of federal superfund sites, State response sites, voluntary cleanup sites, and school cleanup sites.

The Project Site was listed on the Emergency Response Notification System, California Facility Inventory Database Underground Storage Tanks, Statewide Environmental Evaluation and Planning System Underground Storage Tanks, Emissions Inventory, Historical Underground Storage Tanks, HAZNET, Resource Conservation and Recovery Act—Large Quantity Generators, Resource Conservation and Recovery Act and Facility Index System site in the regulatory database report. The Project Site is listed on the California Facility Inventory Database Underground Storage Tanks, Statewide Environmental Evaluation and Planning System Underground Storage Tanks, Emissions

Inventory, and Historical Underground Storage Tanks databases for tracking purposes only as a 2,000-gallon diesel tank is permitted at the Project Site. In addition, the Project Site is listed on the HAZNET, Resource Conservation and Recovery Act—Large Quantity Generators, Facility Index System, and Conservation and Recovery Act—Small Quantity Generators databases for tracking purposes only as the Project Site disposes and handles various types and quantities of hazardous waste. Furthermore, the Project Site is listed on the Emergency Response Notification System database for an incident that occurred in July 1990 where ethylene oxide was spilled. Thus, the potential exists for the Project to create a significant hazard to the public or environment. Therefore, further analysis of this topic will be included in an EIR.

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

No Impact. The Project Site is not located within 2 miles of an airport or within an area subject to an airport land use plan. The closest airport to the Project Site, Van Nuys Airport in Van Nuys, is located approximately 2.8 miles from the Project Site. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The Project Site is not located within 2 miles of a private airstrip. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The City of Los Angeles' General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, along with the location of selected emergency facilities. According to the Safety Element, the Project Site is not located along

a designated disaster route.¹⁸ The nearest disaster routes are Ventura Boulevard approximately 0.15 mile south of the Project Site and Reseda Boulevard approximately 0.19 mile west of the Project Site. The majority of construction activities for the Project would be confined to the Project Site itself; however, limited off-site infrastructure improvements may require some work in adjacent street rights-of-way. As such, some partial lane closures adjacent to the Project Site, including on Burbank Boulevard and Clark Street, may occur. However, these closures would be temporary in nature and even in the event of partial lane closures, both directions of travel on area roadways would be maintained.

In addition, while the Project would include adequate emergency access in compliance with Los Angeles Fire Department emergency access requirements, the Project would generate traffic in the vicinity of the Project Site. As discussed below in Response to Checklist Questions XVI.a through XVI.f, the potential traffic impacts of the Project will be evaluated in the EIR. In any event, the Project Site is not located along a designated disaster route. Therefore, given the proximity of the nearest emergency evacuation routes to the Project Site, the Project would not cause an impediment along the City's designated disaster routes or impair implementation of the City's emergency response plan. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. There are no wildlands located in the vicinity of the Project Site. Furthermore, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone.¹⁹ Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

¹⁸ Los Angeles General Plan Safety Element, Exhibit H, Critical Facilities and Lifeline Systems (November 1996), p. 61.

¹⁹ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 18321 Clark St., <http://zimas.lacity.org/>, accessed June 9, 2016. The VHFHSZ was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

IX. Hydrology and Water Quality

Would the project:

a. Violate any water quality standards or waste discharge requirements?

Potentially Significant Impact. Construction activities associated with the Project would have the potential to result in the conveyance of pollutants into municipal storm drains, particularly during precipitation events. In addition, potential changes in on-site drainage patterns resulting from Project implementation could affect the quality of storm water runoff. Therefore, further analysis of this topic will be included in an EIR.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Potentially Significant Impact. With development of the Project, the amount of on-site impermeable areas could increase compared to existing conditions. Thus, the potential exists for existing percolation of rainwater and irrigation water into the water table to be somewhat diminished, which could affect groundwater recharge. Therefore, further analysis of this topic will be included in an EIR.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Potentially Significant Impact. The Project would involve the demolition of the MRI Center and eight modular buildings, the construction of the Lobby Enhancement, the D&T Expansion, the construction of the New Patient Wing, the construction of several Canopies, and the construction of the new parking structure. As such, the Project would have the potential to alter drainage patterns within the Project Site in a manner which would result in substantial erosion or siltation. Therefore, further analysis of this topic will be included in an EIR.

- d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?**

Potentially Significant Impact. As discussed above in Response to Checklist Question IX.c, the Project has the potential to affect drainage patterns. Such potential changes in drainage patterns could in turn affect the rate or amount of surface water on-site. Thus, further analysis of this topic will be included in an EIR.

- e. 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?**

Potentially Significant Impact. See Response to Checklist Questions IX.a and IX.c, Hydrology and Water Quality, above.

- f. Otherwise substantially degrade water quality?**

Potentially Significant Impact. See Response to Checklist Question IX.a, Hydrology and Water Quality, above.

- g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

No Impact. The Project does not include the development of residential uses. Notwithstanding, the Project Site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency (FEMA) or by the City.^{20,21} According to FEMA, the Project Site is located within Zone X, which is an area determined to be outside the 0.2 percent annual chance floodplain. Therefore, the Project would not place housing within a 100-year flood plain. No impacts would occur, and mitigation measures would not be required. No further evaluation of this topic in an EIR is required.

²⁰ Federal Emergency Management Agency, *Flood Insurance Rate Map, Map Number 06037C1295F, September 26, 2008, accessed March 8, 2016.*

²¹ *Los Angeles General Plan Safety Element, Exhibit F, 100-Year & 500-Year Flood Plain, page 57 (November 1996).*

h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. As discussed above, the Project Site is not located within a designated 100-year flood plain area. Therefore, the Project would not place structures that would impede or redirect flood flows within a 100-year flood plain. No impacts would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less Than Significant Impact. As discussed above, the Project Site is not located within a designated 100-year flood plain. In addition, the Safety Element of the General Plan does not map the Project Site as being located within a flood control basin.²² However, the Project Site is located within the potential inundation area for the Encino Reservoir, which is held by the Encino dam.²³ The Encino dam is a City of Los Angeles dam located in the Santa Monica Mountains, approximately 3.7 miles south of the Project Site. The Encino dam was built in 1924 and can hold up to 12,100 acre-feet of water.²⁴ This dam, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake²⁵ for the site. Pursuant to these regulations, the Encino Dam is regularly inspected and meets current safety regulations. In addition, the Department of Water and Power has emergency response plans to address any potential impacts to its dams. Given the distance of the Encino Dam from the Project Site, the oversight by the Division of Safety of Dams, including regular inspections, and the Department of Water and Power's emergency response program, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam

²² *Los Angeles General Plan Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas (November 1996), p. 59.*

²³ *U.S. Army Corps of Engineers, CorpsMap—National Inventory of Dams, Interactive Map.*

²⁴ *U.S. Army Corps of Engineers, CorpsMap—National Inventory of Dams, NID Interactive Report.*

²⁵ *As used by building codes and building code documents, maximum considered earthquake for a specific area is an earthquake that is expected to occur once in approximately 2,500 years; that is, it has a 2-percent probability of being exceeded in 50 years.*

failure would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

j. Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

The Project Site is located approximately 9.18 miles northeast of the Pacific Ocean. In addition, the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.²⁶ The Project Site is also not positioned downslope from an area of potential mudflow. Therefore, no seiche, tsunami, or mudflow events would be expected to impact the Project Site. No impacts would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

X. Land Use and Planning

Would the project:

a. Physically divide an established community?

Less Than Significant Impact. As shown in the aerial photograph provided in Figure A-2 of Attachment A, Project Description, of this Initial Study, the Project Site is located in a highly urbanized area characterized primarily by low- to mid-rise buildings that are occupied by office, commercial, residential, and medical uses. Land uses surrounding the Project Site include office uses to the north, across Burbank Boulevard; the Tarzana Medical Plaza and, across Etiwanda Avenue and an intervening flood control channel, single-family and multi-family residential uses to the east; multi-family residential uses and medical uses associated with the Tarzana Medical Square to the south, across Clark Street; and commercial uses, including a supermarket, retail, and storage company, to the west.

²⁶ U.S. Army Corps of Engineers, CorpsMap—National Inventory of Dams, NID Interactive Report.

As discussed in Attachment A, Project Description, of this Initial Study, the Project includes the demolition of the MRI Center and eight modular buildings within the Project Site and the construction of the new Lobby Enhancement, the D&T Expansion, the construction of the New Patient Wing, the construction of several Canopies, and the construction of the new parking structure within the existing boundaries of the Providence Tarzana Medical Center. Against this background, the Project would not divide an established community. There is no existing residential use on the Project Site or a residential area that would be physically separated or otherwise disrupted by the Project Site. Moreover, the proposed uses would be compatible with the variety of existing land uses and low- to mid-rise buildings in the surrounding area. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

- b. Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?**

Potentially Significant Impact. As discussed in Attachment A, Project Description, of this Initial Study, the Project requires several discretionary approvals, including zone and height district changes, a General Plan amendment, and a Specific Plan amendment. Therefore, the EIR will provide further analysis of the Project's consistency with the General Plan, the LAMC, the Specific Plan, and other applicable land use plans, policies, and regulations.

- c. Conflict with any applicable habitat conservation plan or natural community conservation plan?**

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles and is currently improved with a hospital and other medical-related uses. As previously described, ornamental trees and limited ornamental landscaping exist on portions of the Project Site. The Project Site does not support any habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan applies to the Project Site. Therefore, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XI. Mineral Resources

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?**

No Impact. No mineral extraction operations currently occur on the Project Site. In addition, the Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur onsite is low. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.^{27,28} The Project Site is also not located within a City-designated oil field or oil drilling area.²⁹ Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR 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. See Response to Checklist Question XI.a, Mineral Resources, above.

XII. Noise

Would the project result in:

- a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Potentially Significant Impact. The Project Site is located within an urbanized area that contains various sources of noise. The most predominate source of noise in the vicinity of the Project Site is associated with traffic from roadways. Existing onsite noise

²⁷ *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.*

²⁸ *State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.*

²⁹ *Los Angeles General Plan Safety Element, Exhibit E, Oil Field & Oil Drilling Areas (November 1996), p. 55.*

sources primarily include vehicle noises associated with onsite circulation and parking areas, stationary mechanical equipment, human activity, and emergency vehicles that access the Project Site. During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, because the Project would introduce new permanent non-residential uses to the Project Site, noise levels from onsite sources may also increase during operation of the Project. Furthermore, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways. Therefore, further evaluation of this topic will be provided in the EIR.

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate and expose people to excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact. Traffic and human activity associated with the Project, as described above, have the potential to increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided in the EIR.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact. As discussed above in Response to Checklist Questions XII.a and XII.b, construction activities associated with the Project would have the potential to temporarily or periodically increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided in the EIR.

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

No Impact. The Project Site is not located within 2 miles of an airport or within an area subject to an airport land use plan. The closest airport to the Project Site, Van Nuys Airport in Van Nuys, is located approximately 2.8 miles from the Project Site. Therefore, no

impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

- f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact. The Project Site is not located within the vicinity of a private airstrip. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XIII. Population and Housing

Would the project:

- a. Induce substantial 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 Impact. The Project does not propose the development of residential uses. Therefore, the Project would not directly induce population growth in the City. However, the Project could indirectly induce population growth through the creation of temporary construction-related jobs and permanent employment opportunities upon buildout of the Project.

With regard to construction, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project, and, therefore, no new permanent residents would be generated during construction of the Project.

With regard to operation, the Project is not expected to have a significant increase in the number of employees due to the decrease in number of hospital beds and relocation of existing uses to other buildings on the Project Site. Notwithstanding, it is anticipated that the Project could include a range of full-time and part-time positions that may be filled by persons already residing in the vicinity of the workplace, and who would not relocate their households due to such employment opportunities. It is also possible that some of the employment opportunities offered by the Project would be filled by persons moving into the surrounding area, which could increase demand for housing. However, it is anticipated that some of this demand would be filled by then-existing vacancies in the housing market and

others by any new residential developments that may occur in the vicinity of the Project Site. Therefore, given that the Project would not directly contribute to population growth in the Project area and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. As such, the Project would not result in a notable increase in demand for new housing, and any new demand, should it occur, would be minor in the context of forecasted growth for the City of Los Angeles or the Encino–Tarzana Community Plan area. Furthermore, as the Project would be located in a developed area with an established network of roads and other urban infrastructure, it would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

Based on the above, the Project would not induce substantial population or housing growth. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?

No Impact. As no housing currently exists on the Project Site, the Project would not displace any existing housing. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

No Impact. As no housing currently exists on the Project Site, the development of the Project would not cause the displacement of any persons or require the construction of housing elsewhere. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XIV. 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:

a. Fire protection?

Potentially Significant Impact. The Los Angeles Fire Department (LAFD) provides fire protection and emergency medical services for the Project Site. The closest LAFD fire station to the Project Site is Fire Station No. 93 located at 19059 Ventura Boulevard in Los Angeles, approximately 1.1 miles west of the Project Site.³⁰ The Project would increase the building square footage on-site. Therefore, further analysis of this issue will be included in an EIR.

b. Police protection?

Less Than Significant Impact. The West Valley Community Police Station, which serves the Project area, is located at 19020 Vanowen Street, approximately 2.5 miles northwest of the Project Site. This station is under the jurisdiction of the LAPD's Valley Bureau. The West Valley Community Police Station serves an area that spans 33.5 square miles and has a resident population of approximately 196,840 people. The boundaries of the West Valley Community Police Station include Roscoe Boulevard to the north, the 405 Freeway to the east, Mulholland Drive to the south, and Corbin Avenue to the west. The West Valley Community Police Station provides a total of 232 sworn personnel and 30 civilian personnel.³¹

With regard to construction, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Given the existing Project Site operations and in accordance with standard construction industry practices, the potential for theft of construction equipment and building materials would be minimized through the use of security fencing, lighting, locked entry, and security patrol of the Project Site and construction areas.

Construction of the Project could also potentially impact the provision of LAPD police protection services and police response times in the vicinity of the Project Site as a result of construction impacts on the surrounding roadways. Specifically, access to the Project Site and the surrounding vicinity could be impacted by construction activities, including utility line connections. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of demolition and graded materials, and construction worker trips. However, during construction of the Project, construction traffic

³⁰ Los Angeles Fire Department, *Fire Station Locator*, www.lafd.org/fire-stations/station-results?st=736&address=18321%20Clark%20St%2C%20Tarzana%2C%20CA%2091356, accessed March 8, 2016.

³¹ West Valley Community Police Station, *About West Valley*, www.lapdonline.org/west_valley_community_police_station/content_basic_view/1616, accessed March 8, 2016.

management plans would be implemented to ensure that adequate and safe access remains available at the Project Site during construction activities. As part of these plans, provisions for temporary traffic control would be provided during all construction activities along public rights-of-way to improve traffic flow on public roadways (e.g., flaggers). In addition, designated truck queuing, equipment staging, and construction worker parking areas would be provided. Given the use of the Project Site as a hospital, and in accordance with City requirements, emergency access to the Project Site would remain clear and unhindered during construction of the Project. Also, given the permitted hours of construction and nature of construction projects, most of the construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. Further, pursuant to Section 21806 of the California Vehicle Code, the drivers of emergency vehicles have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic.

While the Project may increase the daytime population within the West Valley Community Police Station's service area, the Project does not include any residential uses that would directly affect the existing officer-to-resident ratio or the crimes-per-resident ratio citywide or within the West Valley Community Police Station service area. Notwithstanding, the Project Applicant would continue to implement its existing safety standards and procedures as part of the Project to help reduce any on-site increase in demand for police services. Specifically, as discussed in Attachment A, Project Description, of this Initial Study, the Project Applicant has developed and currently implements safety standards and procedures for patients, visitors, employees, volunteers, and medical staff. These standards provide for the implementation of a variety of programs for the safety of those who enter the Project Site, including quarterly inspections of all areas, ongoing staff training, and monthly employee Safety and Disaster Newsletters. The Project Applicant also maintains 24-hour security operations and patrol using contract and in-house staff, provides an excess of 60 security cameras monitoring grounds and interior hospital space, and implements disaster drills and hospital lock downs at least once a year for staff training. The Project Applicant has also developed written plans for hazardous materials and waste management, fire safety, medical equipment, and utility systems.

With regard to emergency access and response times during operation, as discussed in Attachment A, Project Description, of this Initial Study, the Project would maintain existing access to the Project Site and emergency vehicles would continue to access the Project Site from Burbank Boulevard and Clark Avenue. In addition, the Project would not include the permanent closure of any adjacent roads or install barriers along the adjacent roads which could impede emergency access. Furthermore, while the Project could generate additional traffic in the vicinity of the Project Site, pursuant to Section 21806 of the California Vehicle Code, the drivers of emergency vehicles have a

variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Thus, Project-related traffic is not anticipated to impair the LAPD from responding to emergencies at the Project Site or the surrounding area.

Based on the above analysis, the Project would not generate a demand for additional police protection services that would substantially exceed the capability of the West Valley Community Police Station to serve the Project Site. Therefore, the Project would not necessitate the provision of new or physically altered police stations, the construction of which could cause significant impacts, in order to maintain acceptable service ratios or response times. Impacts to police protection service would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). The LAUSD is divided into six local districts.³² The Project Site is located in Local District–Northwest.³³ As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of the LAUSD. In addition, the number of students that may be indirectly generated by the Project that could attend LAUSD schools serving the Project Site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Furthermore, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Thus, the Project would not result in the need for new or altered school facilities. Therefore, impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

d. Parks?

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of

³² *Los Angeles Unified School District, Board of Education Districts Maps 2015-2016*, <http://achieve.lausd.net/Page/8652>, accessed April 6, 2016.

³³ *Los Angeles Unified School District, Board of Education Local District—Northwest Map, May 2015*, <http://achieve.lausd.net/domain/34>, accessed June 9, 2016.

Recreation and Parks. Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: Mecca Avenue Park (located 0.38 mile southwest of the Project Site); Tarzana Recreation Center (located 1.05 miles west of the Project Site); Reseda Recreation Center (located 1.13 miles north of the Project Site); Sepulveda Basin Dog Park (located 1.48 miles northeast of the Project Site); Sepulveda Dam Recreation Area (located 1.66 miles east of the Project Site); Pedlow Skate Park (located 1.67 miles northeast of the Project Site); Balboa Sports Complex (located 1.68 miles northeast of the Project Site); West Valley Park (located 1.69 miles northwest of the Project Site); Balboa Tennis Courts (located 1.79 miles east of the Project Site); Encino Park (located 1.86 miles southeast of the Project Site); Encino Glen Park (located 1.87 miles east of the Project Site); and Encino Community Center located 1.92 miles southeast of the Project Site).

The Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. In addition, the Project is not expected to have a significant increase in the number of employees given the decrease in number of hospital beds and relocation of existing uses to other buildings on the Project Site. While it is possible that some of the new employees that could be generated by the Project may utilize local parks and recreational facilities, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks (the closest of which is Mecca Avenue Park located approximately 0.38 mile southeast of the Project Site). Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Encino–Tarzana Community Plan area, new demand for public parks and recreational facilities associated with Project development would be limited. Therefore, impacts on parks would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

e. Other public facilities?

Less Than Significant Impact. The Project area is served by existing libraries within the Encino–Tarzana Community Plan area, including the nearby West Valley Regional Branch Library, located at 19036 Vanowen Street, approximately 2.5 miles from the Project Site. As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the West Valley Regional Branch Library. In addition, the Project is not expected to have a significant increase in the number of employees given the decrease in number of hospital beds and relocation of existing uses to other buildings on the Project Site. Furthermore, as Project

employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Further, due to the developed nature of the Project vicinity, some of the employees that could relocate to the Project vicinity would likely do so by moving into existing units that would have been previously occupied. As such, any indirect or direct demand for library services generated by Project employees would be negligible. Therefore, impacts on library facilities would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

During construction and operation of the Project, roads would continue to be utilized to access the Project Site. As discussed below in Response to Checklist Question XVI.a, further analysis of the potential for the Project to result in a significant increase in the number of vehicle trips on local roadways will be included in an EIR. Any necessary improvements to local roadways associated with development of the Project will also be identified in an EIR.

XV. Recreation

- 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?**

Less Than Significant Impact. As described above in Response to Checklist Question XIV.d, many public parks and recreational facilities are located in the vicinity of the Project Site. As discussed above in Response to Checklist Question XIV.d, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. In addition, the Project is not expected to have a significant increase in the number of employees given the decrease in number of hospital beds and relocation of existing uses to other buildings on the Project Site. While it is possible that some of the Project's limited number of new employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks and recreational facilities (the closest of which is Mecca Avenue Park located approximately 0.38 mile southeast of the Project Site). Furthermore, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Encino–Tarzana Community Plan area, new demand for public parks and recreational

facilities associated with Project development would be limited. As such, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration of the facility would occur or be accelerated. Therefore, impacts on parks and recreational facilities would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR 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. The Project would not include the development of recreational facilities or require the expansion of recreational facilities. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XVI. Transportation/Circulation

Would the project:

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Potentially Significant Impact. The Project proposes development which has the potential to result in an increase in daily and peak-hour traffic within the vicinity of the Project Site. In addition, construction of the Project has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Once construction is completed, the Project's employees and visitors would generate vehicle and transit trips throughout the day. The resulting increase in the use of the area's transportation facilities could exceed roadway and transit system capacities. Therefore, further analysis of this issue will be provided in the EIR. The EIR will also address compliance with LAMC parking standards.

b. Conflict with an applicable congestion management program including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Potentially Significant Impact. Metro administers the Congestion Management Program (CMP), a State-mandated program designed to address the impacts urban congestion has on local communities and the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Project. The CMP for Los Angeles County requires an analysis of any Project that could add 50 or more trips to any CMP intersection or more than 150 trips to a CMP mainline freeway location in either direction during either the A.M. or P.M. weekday peak hours. Implementation of the Project has the potential to generate additional vehicle trips, which could potentially add more than 50 trips to a CMP roadway intersection or more than 150 trips to a CMP freeway segment. Therefore, further analysis of this issue will be provided in the EIR.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. In addition, the Project's maximum height of 120 feet would not create increased levels of risk with respect to air traffic. Therefore, no impact would occur and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project's design does not include hazardous features. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections, and the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. In addition, the proposed uses would be consistent with the surrounding uses. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

e. Result in inadequate emergency access?

Potentially Significant Impact. While it is expected that construction activities for the Project would primarily occur within the Project Site, construction activities could

potentially require the partial closure of travel lanes on adjacent streets for the installation or upgrading of local infrastructure. Construction within these roadways has the potential to impede access to adjoining uses, as well as reduce the rate of flow of the affected roadway. The Project would also generate construction traffic, particularly haul trucks, which may affect the capacity of adjacent streets and highways. Therefore, further analysis of this issue in an EIR is required.

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Potentially Significant Impact. The Project Site is served by a variety of transit options. The development of the Project would increase demand for alternative transportation modes in the vicinity of the Project Site. Therefore, further analysis of the potential for the Project to conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities will be provided in the EIR.

XVII. Utilities

Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Potentially Significant Impact. The City of Los Angeles Department of Public Works (LADPW) provides wastewater collection and treatment services for the Project Site. As is the case under existing conditions, wastewater generated during operation of the Project would be collected and discharged into existing sewer mains and conveyed to the Hyperion Treatment Plant (HTP) in El Segundo. With the development of new buildings, the Project could result in increased wastewater generation from the Project Site. Thus, this topic will be evaluated further as part of an EIR.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact. Water and wastewater systems consist of two components, the source of the water supply or place of sewage treatment, and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. Given the Project's increase in the amount of developed floor area on the Project Site, further analysis of this issue in an EIR will be provided.

c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact. As discussed in Response to Checklist Questions IX.a and IX.d, above, drainage patterns and the amount of impervious surfaces on-site may be altered as a result of the Project. Therefore, the potential for the Project to require the construction of new stormwater drainage facilities will be analyzed further in an EIR.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Potentially Significant Impact. The Los Angeles Department of Water and Power supplies water to the Project Site. The Project would increase the demand for water provided by LADWP. Therefore, further analysis of this issue in an EIR will be provided.

e. 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?

Potentially Significant Impact. See Response to Checklist Question XVII.b, Utilities, above.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. Various public agencies and private companies provide solid waste management services in the City of Los Angeles. Private collectors service most multi-family units and commercial developments, whereas the City Bureau of Sanitation collects the majority of residential waste from single-family and some smaller multi-family residences. Solid waste generated by the Project would be transported by a private contractor and disposed at a major Class III (municipal) landfill located in Los Angeles County. Ten Class III landfills and one unclassified landfill with solid waste facility permits are located within Los Angeles County.^{34,35} Of the 10 Class III landfills in Los

³⁴ *County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2014 Annual Report, December 2015.*

³⁵ *The ten Class III landfills within Los Angeles County include Antelope Valley, Burbank, Calabasas, Chiquita Canyon, Lancaster, Pebbly Beach, San Clemente, Savage Canyon, Scholl Canyon, and Sunshine Canyon City/County. The unclassified landfill within the Los Angeles County is the Azusa Land Reclamation facility.*

Angeles County, five Class III landfills are open to the City of Los Angeles.³⁶ Within Los Angeles County, there are two solid waste transformation facilities that convert, combust, or otherwise process solid waste for the purpose of energy recovery. These include the Commerce Refuse to Energy Facility located in the City of Commerce and the Southeast Resource Recovery Facility located in the City of Long Beach.

Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.³⁷ Based on the most recent 2014 CoIWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 112.09 million tons.³⁸ For the Class III landfills open to the City, the remaining total disposal capacity is estimated at 93.47 million tons.³⁹ In addition, in 2014, the County's Class III landfills open to the City (excluding the Calabasas Landfill) had a total maximum daily capacity of 22,900 tons per day (tpd) and an average daily disposal of 12,844 tpd, resulting in approximately 10,016 tpd of remaining daily disposal capacity.⁴⁰ Aggressive waste reduction and diversion programs on a countywide level have helped reduce disposal levels at the County's landfills.

Based on the 2014 CoIWMP Annual Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e. 2029), which is well past the Project's build-out year (2022-2025). The County anticipates future disposal needs can be adequately met via a multi-pronged approach that includes successfully permitting and developing proposed in-County landfill expansions, using available or planned out-of-County disposal capacity, developing necessary infrastructure to facilitate exportation of waste to out-of-County landfills, developing conversion and other alternative technologies,

³⁶ *The five Class III landfills open to the City of Los Angeles include Antelope Valley, Calabasas, Chiquita Canyon, Lancaster, and Sunshine Canyon City/County. While the Calabasas Landfill is open to the City of Los Angeles, its service area is limited to the cities of Hidden Hills, Agoura Hills, Westlake Village, and Thousand Oaks per Los Angeles County Ordinance No. 91-0003.*

³⁷ *County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2014 Annual Report, December 2015.*

³⁸ *This total excludes the estimated remaining capacity at the Puente Hills Landfill, which closed on October 31, 2013.*

³⁹ *This total excludes the remaining disposal capacity at the Calabasas Landfill, which is only open to portions of the City that do not include the Project Site.*

⁴⁰ *County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2014 Annual Report, December 2015, Appendix E-1.*

and increasing the Countywide diversion rate by enhancing waste prevention and diversion programs.

The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.⁴¹ The City of Los Angeles is currently diverting 76 percent of its waste from landfills.⁴² The City has adopted the goal of achieving 90 percent by 2025, and zero waste by 2030.

Construction

The Project Site is currently improved with a hospital and other medical related uses. These uses currently generate solid waste within the Project Site. As previously described, the Project includes the removal of the MRI Center, eight modular buildings, and surface parking to construct the Project. The construction activities associated with the Project would generate debris, which would be recycled in accordance with City of Los Angeles Green Building Code (Ordinance No. 181,480) requirements to reduce construction waste by a minimum of approximately 50 percent. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. Given the remaining permitted capacity of the Azusa Land Reclamation facility as well as the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Operation

As shown in Table B-1 on page B-44, with implementation of the Project, the Providence Tarzana Medical Center would generate approximately 5,011 pounds/day of solid waste. As shown in Table B-1, the Project would result in an increase in the amount of solid waste currently generated by the existing uses. Specifically, with implementation of the Project, the Providence Tarzana Medical Center would generate approximately 330 pounds of solid waste more per day. In addition, it is noted that the estimated solid

⁴¹ *City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFAQS.pdf, accessed March 17, 2016.*

⁴² *City of Los Angeles, Bureau of Sanitation, Solid Resources, www.forester.net/pdfs/City_of_LA_Zero_Waste_Progress_Report.pdf, accessed March 17, 2016.*

Table B-1
Estimated Project Solid Waste Generation

Building	Size	Generation Rate^a	Total (lb/day)
Existing			
Hospital ^b	249 beds	16 lb/bed/day	3,984
Tarzana Garden Plaza	39,019 sq. ft.	0.006 lb/sq. ft./day	234
Cube Medical Office Building	65,878 sq. ft.	0.006 lb/sq. ft./day	395
Modular Buildings	11,388 sq. ft.	0.006 lb/sq. ft./day	68
Total Existing			4,681
Proposed			
Hospital ^c	244 beds	16 lb/bed/day	3,904
Ancillary and Support Space ^d	79,680 sq. ft.	0.006 lb/sq. ft./day	478
Tarzana Garden Plaza	39,019 sq. ft.	0.006 lb/sq. ft./day	234
Cube Medical Office Building	65,878 sq. ft.	0.006 lb/sq. ft./day	395
Total with implementation of Project			5,011
Total Net Generation			330
<p>sq. ft. = square feet lb = pound</p> <p>^a CalRecycle, <i>Waste Characterization, Public Sector and Institutions: Estimated Solid Waste Generation Rates</i>. Used rates for Hospital and Office.</p> <p>^b The Hospital includes all existing hospital-related uses, including the existing MRI Center.</p> <p>^c The Hospital includes all existing hospital-related uses to remain and proposed by the Project, including the New Patient Wing, the Lobby Enhancement, and the D&T Expansion.</p> <p>^d The uses within the existing Modular Buildings would be relocated to the Ancillary and Support Space or other location within the Hospital. Refer to Attachment A, Project Description, of the Initial Study, for further details.</p> <p>Source: Eyestone Environmental, 2016.</p>			

waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures, such as compliance with AB 341, which requires California commercial enterprises and public entities that generate 4 or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. The estimated solid waste that would be generated by the Project represents approximately 0.020 percent of the daily solid waste disposed of by the City of Los Angeles in 2014 (the most recent year for which data is available) and represents approximately 0.025 percent of the remaining daily disposal capacity of the County's Class III landfills. Furthermore, the Project's estimated solid waste generation would represent a nominal percentage of the remaining daily disposal capacity of the County's Class III landfills.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

g. Comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. Furthermore, Assembly Bill 341 (AB 341), which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in “zero waste” by 2030. The “blueprint” of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include a recycling area or room of specified size on the Project Site.⁴³ The Project would also comply with AB 939, AB 341, and City waste diversion goals by providing clearly marked, source sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

⁴³ Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

h. Other utilities and service systems?

Potentially Significant Impact. The Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power and the Southern California Gas Company, respectively. Therefore, further analysis of this issue will be provided in the EIR. In addition, while development of the Project would not be anticipated to cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines, further analysis of the Project's consistency with Appendix F will also be provided in the EIR.

XVIII. Mandatory Findings of Significance

- a. Does the project have the potential to 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, 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?**

Less Than Significant Impact. As discussed above, the Project is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. No sensitive plant or animal community or special status species occur on the Project Site. In addition, the Project would not adversely affect any historical or archaeological resources. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR 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).**

Potentially Significant Impact. The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located within the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: aesthetics; air quality; geology and soils; greenhouse gas emissions; hydrology and water quality; land use and planning;

noise; public services (fire protection); transportation/circulation; and utilities (water, wastewater, and energy).

With regard to cumulative effects with respect to agricultural resources, biological resources, hazards and hazardous materials, mineral resources, population and housing, and other utilities (i.e., solid waste), the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. Specifically, with respect to agricultural resources and mineral resources, the Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. With respect to biological resources and hazards and hazardous materials, these resource areas are generally site-specific and would be evaluated within the context of each individual project. Furthermore, related projects would be required to comply with existing regulatory requirements and the City's building permit review and approval process, which address these subjects.

With regard to population and housing and solid waste, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. As discussed in the analysis above, the Project does not propose the development of residential uses. Therefore, the Project would not result in a substantial increase in demand for new housing. With regard to solid waste, as previously stated, the demand for landfill capacity is continually evaluated by the County through preparation of the CoIWMP annual reports. Each annual CoIWMP report assesses future landfill disposal needs over a 15 year planning horizon. Based on the 2014 CoIWMP Annual Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e. 2029), which is well past the Project's buildout year (2022-2025). The preparation of each annual CoIWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's goal to achieve zero waste by 2030.

Therefore, cumulative impacts with respect to these topics would be less than significant, and no mitigation measures are required. No further evaluation of these topics in an EIR is required.

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

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: aesthetics; air quality; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; public

services (fire protection); transportation/circulation; and utilities (water, wastewater, and energy). As a result, these potential effects will be analyzed further in the EIR.