City of

Santa Monica

Providence Saint John's Health Center Phase II Project Draft Environmental Impact Report SCH No. 2017041030

July 2019

Prepared for:

City of Santa Monica
Planning and Community Development Department
1685 Main Street
Santa Monica, CA 90401

Prepared by:

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ACRONYMS AND ABBREVIATIONS

The following definitions are of acronyms and abbreviations used in the Draft EIR:

AB	Assembly Bill
AC	Alternating Current
ACI	American Concrete Institute
ADT	Average Daily Traffic
AF	acre-feet
AFB	Air Force Base
AFY	acre-feet per year
AISC	American Institute of Steel Construction
ALUCP	Airport Land Use Compatibility Plan
amsl	above mean sea level
APN	Assessor Parcel Number
AQMP	air quality management plan
ASCE	American Society of Civil Engineers
AVIRWMP	Antelope Valley Integrated Regional Water Management Plan
BAU	business-as-usual
bgs	below ground surface
BLM	Bureau of Land Management
BMPs	Best Management Practices
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	corporate average fuel economy
CAIO	California Assistant Independent Operator
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission's
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFCs	chlorofluorocarbons
CH_4	methane
CHLs	California Historical Landmarks
CHP	California Highway Patrol

CHRIS	California Historical Resources Information System
CIP	Capital Improvement Program
CIWMB	California Integrated Waste Management Board
CMP	Congestion Management Program
CNDDB	California National Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
Commission	California State Lands Commission
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
CVC	California Vehicle Code
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DC	Direct current
DHS	Department of Health Services
DOC	California Department of Conservation
DOGGR	Division of Oil, Gas, and Geothermal Resources
DOSH	Division of Occupational Safety and Health
DNL	Day-Night Average Sound Level
DPM	diesel particulate matter
DPR	Department of Pesticide Regulation
DRECP	Desert Renewable Energy Conservation Plan
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
EIR	Environmental Impact Report
EKAPCD	Eastern Kern Air Pollution Control District
EPS	Emissions Performance Standard
ESA	Endangered Species Act
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FICON	Federal Interagency Committee on Noise
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
FTIP	Federal Transportation Improvement Program

Gen-tie	generation-tie
GHG	greenhouse gas
GPA	General Plan Amendment
H_2O	water vapor
H_2S	Hydrogen Sulfide
HA	hydrologic area
HAPs	Hazardous Air Pollutants
HM	Habitat Mitigation
HCP	habitat conservation plan
HFCs	hydrofluorocarbons
HSWA	Hazardous and Solid Waste Act
HU	hydrologic unit
HVAC	heating, ventilation, and air-conditioning
Hz	hertz
IBC	International Building Code
IPCC	Intergovernmental Panel on Climate Change
ITS	Intelligent Transportation Systems
KCFD	Kern County Fire Department
KCPC	Kern County Planning Commission
KCOG	Kern Council of Governments
KOP	Key Observation Point
KSA	Kern Sanitation Authority
kV	kilovolt
LACFD	Los Angeles County Fire Department
L_{dn}	Day-Night Average Sound Level
L_{eq}	equivalent sound level
L_{max}	maximum instantaneous
L_{min}	minimum instantaneous
LOS	Level of Service
MBTA	Migratory Bird Treaty Act
MDAB	Mojave Desert Air Basin
mm	millimeter
M_{max}	Maximum Moment Magnitude
MMTCO2e	million metric tons of CO2e
µPa	micropascals
MRZ	Mineral Resource Zone
msl	mean sea level
MT	metric tons
MW	megawatts
MW – AC	megawatts alternating current
N_2O	nitrous oxide

NAAQS	National Ambient Air Quality Standards
NAHC	California Native American Heritage Commission
NASA	National Aeronautical and Space Administration
NAWS	Naval Air Weapons Station
NCP	National Contingency Plan
NEHRP	National Earthquake Hazards Reduction Program
NFIP	National Flood Insurance Program
NFPA	National Fire Protection Association
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NO	nitric oxide
NO_2	nitrogen dioxide
NO_3	nitrates
NOAA	National Oceanic and Atmospheric Administration
NOC	Notice of Completion
NOI	Notice of Intent
NOP/IS	Notice of Preparation/Initial Study
NO_X	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O&M	operation and maintenance
O_3	Ozone
OEHHA	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
OHV	Off-Highway Vehicle
OHWM	ordinary high water mark
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
Pb	Lead
PCDD	Planning and Community Development Department
PCS	Power Conversion Stations
PFCs	Perfluorocarbons
PHI	Points of Historical Interest
PM	particulate matter
PM_{10}	10 microns or less particulate matter
$PM_{2.5}$	2.5 microns or less particulate matter
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PSD	Prevention of Significant Deterioration

PV	photovoltaic
PVC	polyvinyl chloride
PVCS	Photovoltaic Combining Switchgear
RACM	Reasonably Available Control Measures
RCRA	Recovery Act of 1976
RMS	root mean square
ROG	reactive organic gases
RPS	Renewables Portfolio Standard
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SARA	Superfund Amendments and Reauthorization Act
SBB&M	San Bernardino Base and Meridian
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SDC	Seismic Design Category
SF_6	sulfur hexafluoride
SFHA	Special Flood Hazard Area
SIP	State Implementation Plan
SJVAB	San Joaquin Valley Air Basin
SO	sulfur monoxide
SO_2	sulfur dioxide
SO_4	sulfates
SO_X	sulfur oxides
SPCC	Spill Prevention, Control, and Countermeasure
SR	State Route
SRA	State Responsibility Area
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TMDL	Total Maximum Daily Load
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VdB	decibel notation
VOC	volatile organic compound
WMMSHCP	West Mojave Multiple Species Habitat Conservation Plan
ZCC	Zone Classification Change

EXECUTIVE SUMMARY

This chapter of the Environmental Impact Report (EIR) is prepared pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15123, which requires that an EIR include a summary of the Draft EIR. Per Section 15123, the summary shall contain a brief description of the project and the project actions; an identification of potential significant effects and proposed mitigation measures or alternatives that would reduce or avoid those effects; a description of the areas of controversy known to the lead agency; and that presents issues to be resolved.

This EIR evaluates the potential environmental impacts of the Providence Saint John's Health Center Phase II Project (Phase II Project or Project) in the City of Santa Monica.

Project Overview

The Project Site is located in the City of Santa Monica, in the western portion of Los Angeles County. All ten of the Phase II Development Sites are located on the Providence Saint John's Health Center (PSJHC) Campus, which itself is located within the City's Healthcare Mixed Use District in an area generally bound by Arizona Avenue to the north, Broadway to the south, 20th Street to the west, and 23rd Street to the east. Overall, the Phase II Development Sites have a total land area of approximately 407,100 square feet (9.34 acres).

The Providence Saint John's Health Center (PSJHC) Campus, which includes all of the areas contemplated for new development or redevelopment under the recently completed Phase I Project and the currently proposed Phase II Project, is subject to an existing Development Agreement (DA). The DA, which outlines the Phase I and II Projects and has a current term to 2053, was approved by the City in 1998 and subsequently amended in 2011 and 2017. Among other things, the DA specifies Uses at the PSJHC Campus for Phases I and II.

As described fully in Chapter 2, *Project Description*, of this EIR, PSJHC (the Project Applicant) is proposing various legislative amendments, other City approvals, and the expansion of its health care and related facilities as part of the Project. The Project, which would be implemented over an approximately 20-year period, would improve the existing PSJHC Campus with up to approximately 682,700 new square feet of new primarily hospital-related/medical uses (or a net increase of 582,915 square feet), 10 replacement multifamily dwelling units (du), and enhanced vehicular and pedestrian circulation connections. Overall, the Project would include an additional 50,000 square feet of Hospital/Health Care uses (404,000 square feet instead of 354,000 square feet) above that vested for Phase II by the DA, with no increase in the overall floor area vested for Phase II by the DA. Maximum building heights would range from 36 to 105 feet (depending on development site).

Project actions and/or approvals required to implement the Phase II Master Plan Project would include but not limited to:

1. Certification of the Final EIR and Statement of Overriding Considerations
2. Amendments to the City's Hospital Area Specific Plan (HASP) in relation to the Phase II Project;
3. Amendments to the DA (which may be incorporated into an amended and restated DA);
4. Approval of the Phase II Master Plan[1];
5. A Child Care Implementation Plan for Phase II;
6. An Amended Santa Monica Community Access Plan for Phase II;
7. Approval of Development Review Permits for each of the 10 Phase II Project buildings and related open space and infrastructure improvements on the North and South Campuses, following approval of the Phase II Master Plan;
8. An application for a vesting tentative subdivision map and final subdivision map for the PSJHC Campus; and
9. Approval of a street vacation application.

Project Objectives

Section 15124(b) of the CEQA Guidelines requires a project description to contain a statement of a project's objectives and Section 15124(b) requires that the statement of objectives include the underlying purpose of the project. The Project applicant has identified the following objectives that apply to the Phase II Master Plan Project that is analyzed in this EIR.

Objective 1: Health Care and Related Uses and Facilities – Ensure that PSJHC will function as part of an integrated health services delivery system that provides a range of care for Santa Monica and surrounding communities including acute care, outpatient (ambulatory) treatment, health and medical research, illness and disease prevention, community health education, and patient and family supportive services. In particular, PSJHC seeks to provide modern, state-of-the-art facilities within Santa Monica's Healthcare Mixed Use District with sufficient floor area and appropriate floor plates for the following health care and related services:

- Acute Care – Additional acute care services including in-patient hospital beds.
- Ambulatory (Outpatient Care) – Ambulatory health care services, potentially including services in the following areas: cardiovascular, women and children, neuroscience, cancer, joint replacement and sports medicine, surgery, molecular pathology, histology and cytology.
- Medical Research – A new research facility for the John Wayne Cancer Institute that meets the needs of contemporary medical research and connects medical research with related clinical services.

[1] The Phase II Master Plan would establish the basic parameters and vested rights guiding development of the Project. This includes, without limitation: (1) building placement, (2) building heights, (3) building uses, (4) building floor areas, (5) building setbacks, (6) building stepbacks, (7) parking (both subterranean and above-grade), (8) location of uses, (9) vehicular and pedestrian circulation, (10) open space, and (11) a phasing plan.

- Education and Conferencing – Facilities for education and conferencing activities including (i) an auditorium to accommodate large group conferences such as medical/scientific symposia and (ii) smaller conference rooms/classrooms to facilitate smaller conferences and meetings.
- Visitor Housing – Short-term housing for patients, their family members, visiting health care professionals, and participants in conferences and seminars at PSJHC.
- Restaurants and Neighborhood Serving Uses – Restaurants/food service and other neighborhood-serving uses for use by PSJHC workforce, visitors, patients and neighbors and to activate the pedestrian areas in the vicinity of Mullin Plaza, Saint John's Square and Santa Monica Boulevard.

Objective 2: Required Uses and Facilities – Ensure that PSJHC provides the following uses and facilities as required by the DA:

- Child Care – An expanded child care program to meet the additional child care needs generated by the Phase II Project workforce as determined in accordance with the DA.
- Replacement Housing – Replacement of the existing ten-unit rental housing building as part of the Phase II Project in accordance with the DA.

Objective 3: Phase II Master Plan and Development Program – Develop a comprehensive Master Plan for Phase II of the PSJHC Campus (Phase II Master Plan) and a Development Program that are designed to achieve the following objectives:

- Uses and Facilities – Achieves Project Objectives 1 and 2 with respect to health care and related uses and facilities.
- Vested Uses and Vested Floor Area – Accommodates PSJHC Vested Uses and Vested Floor Area as provided in the DA.
- Campus Integration – Integrates the buildings, uses, location of uses, open space, infrastructure and circulation for Phases I and II, both north and south of Santa Monica Boulevard.
- Location of Uses – Ensures that acute care, outpatient treatment and related services are situated in close proximity to each other in order to maximize efficiency, provide convenient patient access to needed and assistive services, and control costs.
- Open Space – Preserves and expands open space on PSJHC Campus in accordance with the DA requirement of 35% open space on the South Campus and links the open space areas with pedestrian pathways.
- Uninterrupted Health Care Services – Ensures that PSJHC remains in continuous operation as a hospital and health care facility during development of the Phase II facilities.
- Phasing Objectives – Includes a schedule for Phase II development that will allow PSJHC to construct its Phase II Project buildings and related circulation, infrastructure and open space improvements in stages to: (i) ensure PSJHC health care and related services continue without interruption; (ii) ensure that PSJHC circulation, infrastructure and open space improvements are coordinated with the construction of Phase II Project buildings; (iii) ensure that PSJHC provides sufficient parking to meet its peak parking demand at all stages of Project; and (iv) allow PSJHC sufficient time to raise the necessary funds to proceed with Phase II.

Objective 4: Mobility and Circulation – The Project has the following Mobility and Circulation objectives:

- Develop and implement a comprehensive circulation plan for vehicles, bicycles and pedestrians that integrates PSJHC Campus circulation with circulation in the surrounding area.
- Provide effective and convenient connections for all transportation users (vehicles, bicycles, and pedestrians) between the uses and buildings constructed under Phase I and proposed under the Phase II Project.
- Ameliorate impacts on surrounding streets by adding new driveways and/or streets on the South Campus to provide access to underground parking.
- Create a vibrant pedestrian environment and protect residents on 21st Street from cut-through vehicular traffic by converting a portion of 21st Street to a "living street" that is dedicated to pedestrians while maintaining emergency vehicle access.
- Ameliorate impacts on all modes of transportation around and to/from the Campus, including the bicycle lanes on Broadway.
- Create a bicycle-friendly Campus by providing convenient access to/from the Campus, including connections to the existing bicycle lanes in the surrounding area, and dispersing bicycle parking throughout the Campus.

Objective 5: Parking – The Project has the following Parking objectives:

- Ensure that PSJHC continues to provide sufficient vehicular parking to meet PSJHC peak parking demand at all times.
- Ensure that PSJHC parking supply is based upon periodic reassessments of PSJHC peak parking demand and is "right-sized" based upon such reassessments.
- Provide ample on-site bicycle parking and storage for employees, patients and visitors.

Objective 6: Minimize Vehicle Miles Traveled – Minimize vehicle miles traveled by implementing a comprehensive Transportation Demand Management (TDM) program for both Phase I and the Phase II Project that includes incentives for alternative transportation (public transportation, bicycling and walking), ride sharing, flexible work hours and possibilities for remote work that reduce peak hour trips, and health care and supporting uses placed in close proximity to each other so as to reduce vehicle trips between various health care providers.

Objective 7: Minimize Phase II Impacts – Ensure that the Phase II Phasing Plan and schedule minimize impacts on PSJHC neighbors and PSJHC existing uses and facilities to the extent reasonably feasible.

Public Review Process

In compliance with the State CEQA Guidelines, the City provided opportunities to the public to participate in the environmental process. During preparation of the Draft EIR, various State, regional and local government agencies and other interested parties were notified to solicit comments on the scope of the EIR and to inform the public of the Project.

Specifically, pursuant to the provision of Section 15082 of the State CEQA Guidelines, the City circulated a Notice of Preparation (NOP) to State, regional, and local agencies, and members of the public for a 32-day period commencing April 10, 2017 and ending May 11, 2017. The purpose of the NOP was to formally convey that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the

Draft EIR. The NOP was distributed to applicable federal, state, regional, and city agencies, neighborhood groups, and occupants and owners within a 1,000-foot radius of the Project Site. In addition, the NOP was posted in the Santa Monica Daily Press and the City's City Planning Division website. See Appendix A-1, Notice of Preparation, of this EIR.

The NOP included notification that a public scoping meeting would be held to further inform public agencies and other interested parties of the Project and to solicit input regarding the Draft EIR. The public scoping meeting was held on April 24, 2017. The meeting included a presentation of the Project and an overview of the CEQA process followed by an open house format which provided interested individuals, groups, and public agencies the opportunity to view materials, ask questions, and provide oral and written comments to the City regarding the scope and focus of the Draft EIR as described in the NOP. The presentation materials and other documentation from the Scoping Meeting are provided in Appendix A-2, Scoping Meeting Materials, of this Draft EIR.

Nine written comment letters and emails responding to the NOP were submitted to the City. Responses to the NOP were provided by various public agencies and organizations, including the State of California Governor's Office of Planning and Research (OPR) State Clearinghouse and Planning Unit, California Department of Transportation, California Native Heritage Commission, Los Angeles County Metropolitan Transportation Authority, South Coast Air Quality Management District, and four individuals/other interested parties. Public comments received during the NOP circulation period are provided in Appendix A-3, NOP and Scoping Meeting Comments, of this Draft EIR.

Areas of Controversy/Issues to Be Resolved

Section 15123 of the CEQA Guidelines states that an EIR shall identify areas of controversy known to the lead agency, including issues raised by the agency and the public during the scoping process. The environmental issues listed below were those of key concern that may be controversial. Each of these issues is evaluated further in this EIR.

- Impacts to the visual character of the area.
- Neighborhood compatibility and preservation of community character.
- Impacts to archaeological (including tribal) and historical resources, including the required Assembly Bill 52 tribal consultations.
- Air quality impacts, including odors.
- Construction effects (construction emissions, noise/vibration, and traffic).
- Noise from ambulance sirens (Note: The Project does not propose any changes in operation or site planning that would increase emergency vehicles or siren use.)
- Transportation and circulation impacts, including traffic congestion impacts and impacts to Congestion Management Plan (CMP) facilities, transit, and pedestrian/bicycle safety
- Vehicle Miles Travelled (VMT) analysis required by Senate Bill 743 and the newly updated (December 2018) CEQA Environmental Checklist

Parking impacts were also raised as an issue in the comments received from the public in response to the NOP and the public scoping meeting. However, per Senate Bill 743 and CEQA Statute Section 21099, parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. Therefore, in accordance with SB 743 and CEQA Section 21099, the parking impacts of the Project are not addressed in this EIR other than providing information establishing that the Project would meet City parking requirements. See Section 4.17, *Transportation*, of this EIR for further discussion.

Significant and Unavoidable Environmental Impacts

CEQA Guidelines Section 15126 requires that an EIR describe any significant impacts that cannot be avoided, even with implementation of feasible mitigation measures. As indicated in Chapter 4, *Environmental Impact Analysis*, of this EIR, the Project would result in significant unavoidable impacts in terms of air quality, construction effects, cultural resources - historical resources, neighborhood effects, noise and vibration (vibration), and transportation. Each of these impacts is summarized below.

Air Quality

As indicated in Section 4.2, *Air Quality*, of this EIR, Project Interim Year (2031) operational nitrogen oxides (NO_x) emissions would be reduced with implementation of the proposed mitigation measure (e.g., MM-AIR-1), but would still exceed South Coast Air Quality Management District (SCAQMD) regional operational thresholds. Therefore, operational NO_x emissions would be significant and unavoidable. However, it should be noted that if the SCAQMD regional construction thresholds were applied, total Project construction and operational emissions would be below all thresholds.

Construction Effects

As indicated in Section 4.3, *Construction Effects*, of this EIR, Project construction activities could result in significant unavoidable vibration impacts. See Subsection 6.2.5, *Noise and Vibration*, below for further discussion.

Cultural Resources - Historical Resources

As indicated in Section 4.4*, Cultural Resources - Historical Resources*, of this EIR, the Project would result in a significant unavoidable impacts to historical resources due to demolition of the Cancer John Wayne Cancer Institute Building (JWCI) and Lt. Joseph P. Kennedy Jr. Memorial Child & Family Development Center (CFDC). The implementation of the proposed mitigation measures (e.g., MM-HIST-1 through -3) would address impacts, but would not reduce to less than significant levels as there is no feasible mitigation to reduce demolition of these historical resources to a less than significant level.

Neighborhood Effects

As indicated in Section 4.12, *Neighborhood Effects*, of this EIR, no mitigation is available for the significant neighborhood effects of the Project in terms of one of the traffic issues analyzed (e.g.,

operational intersection and street segment LOS, see discussion below). Therefore, Project operational traffic-related neighborhood effects would be significant and unavoidable.

Noise and Vibration

As indicated in Section 4.13, *Noise and Vibration*, of this EIR, participation in Mitigation Measure MM-NOISE-2 would prevent vibration impacts to vibration sensitive medical equipment at Medical Office Buildings not owned/controlled by Saint John's. Participation in MM-NOISE-2 includes location inventory, simulation testing, equipment relocation, and equipment isolation. MM-NOISE-2 also requires that no construction be conducted during active use of equipment, or alternative construction methods. Thus, potentially significant construction vibration impacts at participating Medical Office Buildings not owned/controlled by Saint John's would be reduced to a less than significant level. However, for any Medical Office Buildings not owned/controlled by Saint John's that do not participate in MM-NOISE-2, Project construction vibration could result impacts to vibration sensitive medical equipment. Therefore, the impact would be significant and unavoidable.

Transportation

As indicated in Section 4.17, *Transportatio*n, of this EIR, Project intersection and street segment operations impacts would be significant and unavoidable at fourteen study intersections and six segments under Interim Year (2031) and/or Future Year (2042) conditions. The impacts at these intersections would be significant and unavoidable as feasible mitigation is not available to reduce the impacts at these intersections to less than significant levels due to lack of additional adequate right-of-way area, inconsistency with adopted City policies, and/or because they would result substantial secondary impacts. See Section 4.17 for further discussion.

Intersections*

26. 20th Street & Arizona Avenue
33. 20th Street & Pico Boulevard
42. 23rd Street & Arizona Avenue
44. 23rd Street & Broadway
50. Cloverfield Boulevard & Olympic Boulevard
53. Cloverfield Boulevard & I-10 Eastbound On-Ramp
70. Centinela Avenue & Santa Monica Boulevard**
74. Centinela Avenue & I-10 Westbound On-Off Ramps
77. Bundy Drive & Santa Monica Boulevard**
79. Bundy Drive & Olympic Boulevard[2]
80. Bundy Drive & Ocean Park Boulevard
81. Bundy Drive & I-10 Eastbound On-Ramp**

[2] The mitigation for Intersection 79 identified in Section 4.17 of this EIR would reduce the Project's significant operational level of service impact at this intersection, but not to less than significant levels.

82. Barrington Avenue & Wilshire Boulevard
83. Barrington Avenue & Santa Monica Boulevard

* These are Project and cumulative impacts.

** If appropriate approvals are granted by the City of Los Angeles (and by Caltrans in the case of Intersection 81) in conjunction with the mitigation measures identified in Section 4.17 for Intersections 70, 77, and 81, Project impacts at these intersections would be mitigated to less than significant levels.

Street Segments*

1. Arizona Avenue west of 17th Street
2. Arizona Avenue west of 20th Street
9. 23rd Street north of Wilshire Boulevard
10. 23rd Street north of Arizona Avenue
11. 23rd Street north of Santa Monica Boulevard
14. 23rd Street south of Ocean Park Boulevard

* These are both Project and cumulative impacts.

Alternatives to Reduce Potential Impacts

Alternatives Evaluated

The CEQA Guidelines require an analysis of alternatives to proposed projects. According to CEQA Guidelines Section 15126.6 (a), the purpose of analyzing project alternatives is to identify alternatives that "…*would avoid or substantially lessen any of the significant effects of the project."* According to Section 15126.6(e), an EIR alternatives analysis should include the analysis of a No Project Alternative to allow decision makers to compare the impacts of approving a proposed project with the impacts and foreseeable future of not approving that project.

As indicated in Chapter 4.0, *Environmental Impact Analysis*, of this EIR, Project impacts would be less than significant or less than significant with mitigation incorporated for the majority of the environmental topics evaluated, with significant unavoidable adverse air quality, historical resources, neighborhood effects, and traffic impacts. The alternatives were formulated to reduce the magnitude of the Project's environmental impacts and inform the decision-making process.

The five alternatives analyzed are described below.

- **Alternative 1 – No Project/No Build:** Per CEQA Guidelines Section 15126.6(e)(2), the No Project/No Build Alternative analysis discusses the existing conditions at the time the Notice of Preparation (NOP) was published (April 7, 2017) and compares impacts of the No Project/No Build Alternative to the Project. Under the No Project/No Build Alternative, the Project would not be developed. Rather, the existing on-site uses (e.g., medical, medical office, laboratory, day care, and vacant residential totaling 110,055 square feet of floor area, along with the existing entry plaza and surface parking) would remain unchanged.

- **Alternative 2 – Tier 1 Only:** Alternative 2 assumes development of the Phase II Development Sites with healthcare and related uses at the Tier 1 densities and heights with associated parking

(e.g., not at the Tier 2 densities and heights permitted by the SSMC with the provision of specified community benefits). In addition, the existing street network would remain as is. There would be no new streets such as 20th Place and Saint John's Way and, the northern portion of 21st Street would not be vacated. Instead, site access would be directly from the streets adjacent to the Phase II sites. Furthermore, the below-grade tunnels connecting parking garages and above-grade pedestrian connections over Santa Monica Boulevard would not be constructed.

Phase II programs would be provided in new buildings that comply with the Tier 1 density and height consistent with each site's underlying zoning. The total floor area available for Phase II uses would be reduced by about 110,000 square feet as a result of the Tier 1 height and density limitations. In addition to reducing the total floor area available for healthcare uses, Alternative 2 would not include an Education and Conference Center, Visitor Housing, Saint John's Café or Mullin Plaza Café. The on-site open space would also be significantly reduced due to the Tier 1 height limit. In contrast to the proposed Project, this alternative would not require the relocation of existing utilities. This alternative would include 510,450 square feet of new floor area (including 25 dwelling units [du]), or a net increase of 400,395 square feet (including 25 du).

- **Alternative 3 – Reduced Healthcare Uses with Tier 2 Housing on South Campus:** This alternative represents a reduction in the healthcare uses compared with the proposed Project and a reduction in open space, with an overall increase in the total floor area to accommodate residential development on the South Campus in response to public comments received during the preliminary hearings and NOP scoping meeting to explore adding housing as part of the Phase II Master Plan. Total development on the North Campus would be consistent with the Master Plan, with variations in the proposed uses to accommodate replacement of the Child and Family Development Center, including its Daycare uses, on Development Site 2I (rather than moving the Child and Family Development Center to a new building on the South Campus along Broadway). The northern portion of the South Campus (along Santa Monica Boulevard) would be developed with healthcare uses in buildings with similar setbacks, densities and heights as the Phase II Master Plan. On the southern portion of the South Campus, development would be primarily multi-family housing (247 multi-family units, including 10 replacement units) at Tier 2 densities and heights with a reduction of open space on the South Campus.

  No Visitor Housing would be developed. In addition, the existing street network would remain as is. There would be no new streets such as 20th Place and Saint John's Way and, the northern portion of 21st Street would not be vacated. Furthermore, the above-grade pedestrian connections over Santa Monica Boulevard and the tunnels beneath Santa Monica Boulevard would not be constructed. In contrast to the Project, this alternative would not require relocation of the existing utilities. This alternative would include 809,650 square feet of new floor area (including 247 du), or a net increase of 699,595 square feet (including 247 du), with the maximum building heights the same as the proposed Project (except in PAs S1 and S2 where they would be approximately 30 feet greater).

- **Alternative 4 – Reduced Master Plan:** Alternative 4 represents a reduction in the Phase II Master Plan, with a reduction in height such that all new buildings would be no greater than 70 feet consistent with the Zoning Ordinance's HMU Tier 2 maximum height. Under Alternative 4, total development on the Saint John's Campus would be reduced due to the decreased height as compared to the Master Plan, with the assumption that building footprints and open space would be provided similar to the project. In addition, Alternative 4 assumes the same proposed street network as the Master Plan, including new streets such as 20th Place and Saint John's Way and, the northern portion of 21st Street would be vacated. Furthermore, the tunnel

connections and above-grade pedestrian connections over Santa Monica Boulevard would be constructed. Similar to the project, this alternative would require relocation of existing utilities. This alternative would include 557,500 square feet of new floor area (including 44 du), or a net increase of 447,445 square feet (including 44 du).

- **Alternative 5 – Partial Master Plan:** This alternative represents a reduction in the Phase II Master Plan, with the assumption that only some phases of the Master Plan would be implemented. Under Alternative 5, total development on the Saint John's Campus would be reduced as compared to the Master Plan. Specifically, no development for 2D/E, S4, or S5 would occur (e.g., no Education and Conference Center, East Ambulatory Care and Research Building, visitor housing, or East Ambulatory & Acute Care Building), and existing uses (e.g., PSJHC Foundation Building, John Wayne Cancer Institute, and surface parking) would remain as they are on these sites.

  Under Alternative 5, Development Sites 2I, 2C, S1, S3, and S2 would be redeveloped with the same programming as the Master Plan. The building location, uses, and building setbacks are assumed to be generally the same as the project. In addition, Alternative 5 assumes the same proposed street network as the Master Plan, including new streets such as 20th Place and Saint John's Way and the vacation of the northern portion of 21st Street. Furthermore, similar to the Project, the west tunnel connection and the above-grade pedestrian connection over Santa Monica Boulevard would be constructed, and utility relocations would be required. This alternative would include 357,600 square feet of new floor area (including 10 du), or a net increase of 247,545 square feet (including 10 du).

Environmentally Superior Alternative

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

Alternative 1 would have less impacts than the proposed Project and the other alternatives as it would have no impacts on the environment. However, Alternative 1 would not meet any of the Project objectives, nor would it provide the community benefits associated with the Project. Furthermore, in accordance with CEQA, because Alternative 1 (the "no project" alternative) would be the environmentally superior alternative, this EIR identifies another environmentally superior alternative from among the remaining alternatives.

Alternatives 2, 4 and 5 would all have less impacts than the proposed Project, owing primarily to the lesser amount of development under these alternatives. Alternative 3 would have greater impacts than the proposed Project, owing primarily to both the greater amount of development under this alternative and the greater number of residential uses that are more impactful than health care uses for a number of environmental issue areas.

Between Alternatives 2, 4 and 5, Alternatives 4 and 5 would be the least impactful, each resulting in less impacts than the proposed Project in 15 environmental issue areas, similar impacts in four, and greater impacts in two. Alternative 5 would include less development than Alternative 4, such that the level of most of the impacts would be less under Alternative 5. In addition, Alternative 5

would avoid the significant unavoidable historical resources impacts to the John Wayne Cancer Institute building that would occur under the proposed Project and Alternatives 2 and 3, and 5, and would result in significant unavoidable operational level of service impacts to fewer intersections and street segments than these other alternatives. Therefore, Alternative 5 (Partial Master Plan) is identified as the environmentally superior alternative. However, it is noted that Alternative 5 (and indeed Alternatives 2 and 4) would not meet all the Project objectives.

Summary of Environmental Impacts

This section provides a summary of Project impacts, Project Design Features, mitigation measures, and level of significance after implementation of the mitigation measures identified for the Project. The summary is provided by environmental issue area below in **Table ES-1**, *Summary of Project Impacts, Project Design Features, and Mitigation Measure*s. The analyses upon which the summary table is based are presented in Chapter 4.0, *Environmental Impact Analysis*, of this EIR.

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
Aesthetics			
Impact Statement AES-1: There are no protected views or view corridors within the Project area and no scenic vistas across the Project Site. Implementation of the Project would not have a substantial adverse effect on a scenic vista.	--	No mitigation measures are required.	Less than significant.
Impact Statement AES-2: The Project is not located on or near a scenic highway. Implementation of the Project would not substantially damage scenic resources within a scenic highway.	--	No mitigation measures are required.	Less than significant.
Impact Statement AES-3: The Project would be consistent with applicable regulations and policies addressing scenic quality including those set forth under the SMMC, objectives of the Santa Monica Urban Forest Master Plan, the Land Use and Circulation Element, and the Hospital Areas Specific Plan. Therefore, impacts with respect to regulations governing scenic quality would be less than significant.	--	No mitigation measures are required.	Less than significant.
Impact Statement AES-4: Project implementation would create new sources of light and glare. However, light and glare levels would not adversely affect day- or nighttime views in the area. Compliance with standard regulations and design review approval would ensure that impacts of the Project would be less than significant.	--	No mitigation measures are required.	Less than significant.
Impact Statement AES-5: Project implementation would create shadows over existing adjacent sensitive uses; however, the shadows would not create shading effects that would substantially interfere with the use of outdoor open space or solar accessibility.	--	No mitigation measures are required.	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
Air Quality			
Impact Statement AQ-1: The Project's short-term jobs during construction would not conflict with the AQMP's long-term employment projections and Project construction would comply with the applicable regulations for reducing criteria pollutant emissions during construction activities. The Project's employee growth would not exceed the expected regional growth projections and Project operations would be consistent with regulations for reducing criteria pollutants. Therefore, the Project's construction and operations would not conflict with implementation of the AQMP or relevant air quality-related policies in the General Plan or other adopted regional and local plans adopted for reducing air quality impacts and impacts would be less than significant.	**PDF-AQ-1: Demolition, Grading and Construction Activities** 1. Compliance with provisions of the SCAQMD District Rule 403. The Project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403: a. All unpaved demolition and construction areas shall be wetted at least three times daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting a minimum of three times daily will reduce fugitive dust by 61 percent. b. The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind. c. All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust. d. All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust. e. All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust. f. General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. g. Trucks having no current hauling activity shall not idle and be turned off. h. Ground cover in disturbed areas shall be replaced as quickly as possible.	No mitigation measures are required.	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
	i. Cranes would be electric-powered. 2. Anti-Idling Regulation: In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. 3. Fuel Requirements: In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards. 4. Architectural Coatings: During construction of Phase II buildings, construction contractors shall comply with SCAQMD Rule 1113 and utilize architectural coatings that meet the VOC content requirements. **PDF-AQ-2: Green Building Features** At a minimum, Phase II buildings will be designed and operated to meet the applicable requirements of the California Green Building Standards Code (CALGreen) and the City of Santa Monica Green Building Code. Green building features will include the following: 1. Waste a. Construction contractors for Phase II development will implement a construction waste management plan (WMP) to divert a minimum of 70 percent of all mixed construction and demolition (C&D) debris to City certified construction and demolition waste processors, consistent with the City of Santa Monica Municipal Code Article 8, Chapter 8.108. b. The Project will include easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics, metals, and landscaping debris (trimmings),		

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
	consistent with the City of Santa Monica Municipal Code, Section 9.21.130. 2. Energy a. Phase II buildings will comply with the California 2016 Title 24 Building Energy Efficiency Standards or the most recent standards at the time of building permit issuance. Additionally, the Project will comply with the City of Santa Monica Green Building Code by incorporating solar water heating, green roofs, high-performance building envelopes, energy-efficient HVAC and lighting systems, thereby reducing energy use, air pollutant emissions, and GHG emissions. b. Phase II buildings will include the installation of solar electric photovoltaic (PV) systems, as required by the City of Santa Monica Green Building Standards Code. At minimum, the PV systems will have a total wattage of 2.0 times the square footage of the building footprint (2.0 watts per square foot). c. The design of Phase II buildings will incorporate surface materials with a high solar-reflectance-index average, coupled with roof assemblies having insulation factors that meet the 2016 California Title 24 Building Energy Efficiency Standards or the most recent standards at the time of building permit issuance, to reduce unwanted heat absorption and minimize energy consumption. 3. Transportation a. Providence Saint John's will implement a Transportation Demand Management (TDM) Plan with measures to decrease vehicle miles traveled. The specific TDM strategies to be implemented by the developer shall be finalized as part of the Development Agreement process. It is anticipated that the following TDM strategies will be implemented and/or maintained: a TDM Coordinator;		

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
	Transportation Management Association (TMO); transit pass subsidies provided to employees by the Project Applicant; ridesharing (carpools and vanpools); parking pricing; Guaranteed Ride Home (GRH); bicycle facilities; carshare service; bicycle sharing areas; transportation information center and TDM website information; pedestrian wayfinding signage; and commuter club. b. To encourage carpooling and the use of electric vehicles by Providence Saint John's employees and visitors, designated parking for carpools and vanpools will be provided throughout the North and South Campuses in accordance with SMMC Section 9.28.150. c. Electric Vehicle (EV) Charging Stations will be provided throughout the North and South Campuses. The total number of electric vehicle charging stations would be determined as part of the Development Agreement to be finalized; however, all Phase II Project facilities with more than 50 parking spaces would provide at least two charging stations plus one for each additional 50 parking spaces consistent with SMMC Section 9.28160(B)(2). d. Both long-term and short-term bicycle parking will be provided throughout the North and South Campuses. The number of parking spaces shall be provided in accordance with SMMC Table 9.28.140, which requires one short-term bicycle parking space for every 4,000 square feet of floor area (depending on the use). Upon full Phase II Project implementation, PSJHC shall have more than 60 new short-term bicycle parking spaces and 120 new long-term bicycle parking spaces added to its North Campus and more than 100 new short-term spaces and more than 200 new		

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
	long-term spaces added to its South Campus. Showers and clothes lockers for employees will also be provided throughout the North and South Campuses. In accordance with SMMC Section 9.28.170(B)(1), a minimum of two showers would be provided in Phase II Buildings 2C, 2D/E, 2I, and S1 while a minimum of four showers would be provided in Building S4. Consistent with SMMC Section 9.28.170(B)(2), lockers for clothing and other personal effects would be provided at a ratio of 75% of the long-term employee bicycle parking spaces required. Upon full Phase II Project implementation, PSJHC would have more than 90 new clothes lockers on its North Campus and more than 100 new clothes lockers on its South Campus. 4. Water a. The Project would be designed to reduce indoor and outdoor potable water consumption as required by California 2019 Title 24 standards. **PDF-AQ-3: Control of VOCs** Phase II buildings will utilize low-emitting materials in accordance with PDF-AQ-1. **PDF-AQ-5: Emergency Generators** All new standby generators proposed shall be selected from the South Coast Air-Quality Management District's certified generators list and meet the EPA Tier 4 standard for diesel emissions. For after-treatment of engine exhaust air, a diesel particulate filter shall be provided to meet the emission level requirements of the South Coast Air Quality Management District. The Project would have six generators and would need to be tested monthly to ensure reliability in the case of a power outage.		

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
Impact Statement AQ-2: The South Coast Air Basin is designated as non-attainment for O3, PM10, and PM2.5 under federal and/or state ambient air quality standards. Construction and operation of the Project would generate emissions that would contribute to basin-wide air pollutant emissions. The Project would exceed regional NOx thresholds during construction and interim year operations. Therefore, the Project construction and interim operations would potentially contribute to a cumulatively considerable net increase of criteria pollutants and impacts would be potentially significant. Mitigation measures would be required. With implementation of mitigation measures, regional construction NOx emissions would be reduced below the SCAQMD's regional threshold. However, the Project's concurrent construction and interim operations would continue to exceed the regional NOx threshold and impacts would be temporarily significant and unavoidable.	**PDF-AQ-4: Emergency Generator Maintenance & Testing** The Project shall only conduct maintenance or testing on one generator per day and for only one hour. PDF-AQ-1, PDF-AQ-2, PDF-AQ-3, and PDF-AQ-5 (see above).	**MM-AIR-1 (Construction Equipment):** Construction equipment operating at each Phase II development site shall be subject to the following requirements, which will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment: • The Project shall require all off-road diesel equipment greater than 50 horsepower (hp) to meet USEPA Tier 4 Final off-road emission standards or equivalent to reduce diesel particulate matter and NOX emissions during construction activities. If equipment cleaner than Tier 4 is widely and commercially available at the time of building permit issuance, the Project applicant shall require the use of such equipment for construction. • Dumpers/tenders, forklifts, pumps, sweeper/scrubbers and plate compactors shall be powered by non-diesel fuels, such as gasoline, compressed natural gas or electricity.	Significant unavoidable.
Impact Statement AQ-3: The Project's localized maximum daily Project operational emissions of criteria air pollutants would not exceed the applicable SCAQMD localized concentration thresholds. Localized maximum daily Project construction emissions of criteria air pollutants of NOX and PM10 would exceed the applicable SCAQMD localized concentration thresholds. Therefore, mitigation measures would be required for construction. With implementation of mitigation measures, localized construction impacts would be reduced to levels below SCAQMD significance thresholds, therefore, localized construction impacts would be less than significant with mitigation. Project-generated traffic, together with other cumulative traffic in the area, would incrementally increase carbon monoxide levels at an intersection or roadway within one-quarter mile of a sensitive receptor. However, the	PDF-AQ-1 through PDF-AQ-5 (see above).	MM-AIR-1 (see below).	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
Project would not cause or contribute to an exceedance of the California Ambient Air Quality Standards (CAAQS) one-hour or eight-hour Carbon Monoxide (CO) standards of 20 or 9.0 parts per million, respectively. Therefore, CO hotspot impacts would be less than significant. During construction and operation of the Project, toxic air contaminants (TACs) would be emitted and result in an incremental cancer risk or cancer burden increase at nearby sensitive receptors. Project construction would exceed the applicable SCAQMD incremental cancer risk or cancer burden thresholds for TACs. Therefore, mitigation measures would be required. With implementation of mitigation measures, residential cancer risk would be reduced below the SCAMQD's 10 per million significance threshold, therefore impacts would be less than significant with mitigation.			
Impact Statement AQ-4: The Project's land uses are related to hospital uses and are not expected to introduce substantial sources of other emissions including odors and is not associated with any land uses or operations that are associated with odor complaints. Therefore, Project construction and operations would not create objectionable odors affecting a substantial number of people and impacts would be less than significant.	--	No mitigation measures are required.	Less than significant.
Construction Effects			
Impact Statement CE-1: Project construction activities would not substantially degrade the existing visual character or quality of the surroundings. Furthermore, Project construction activities would result in less than significant transportation impacts with implementation of the proposed PDF, and less than significant air quality and noise impacts with implementation of the proposed PDFs and mitigation measures. However, Project construction activities could	PDF-AQ-1, PDF-AQ-2, and PDF-AQ-3 (see above); PDF-NOISE-1 and PDF-NOISE-2 (see below); PDF-TR-1 (see below).	MM-AIR-1 (see above); MM-NOISE-1 (see below).	Significant unavoidable (construction vibration)

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
result in significant construction-related vibration impacts at some adjacent vibration-sensitive medical uses not owned by Saint John's if they do not agree to participate in the vibration mitigation identified in this EIR. Therefore, significant unavoidable construction period impacts could occur.			
Cultural Resources Historical Resources			
Impact Statement HIST-1: The Project would cause a substantial adverse change in the significance of historical resources as defined in Section 15064.5 due to demolition of the JWCI and the CFDC. Therefore, even with implementation of mitigation measures, impacts to these historical resources would remain significant and unavoidable.	--	**Mitigation Measure HIST-1: Recordation of the JWCI and CFDC** Prior to any demolition or ground disturbing activity on these properties, the Applicant shall retain a Qualified Preservation Professional (defined as an architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture, pursuant to 36 CFR 61) to prepare a Historic American Buildings Survey (HABS) Short Format Report I. The HABS shall record the history of each property, as well as important events or other significant contributions to the patterns and trends of history with which each property is associated, as appropriate. Each property's physical condition, both historic and current, shall be documented through site plans; historic maps and photographs; available original and/or current as-built drawings; large format photographs; and written data and text. Each building's exteriors, representative interior spaces, character-defining features, as well as its setting and contextual views, shall be documented. Field photographs and notes shall also be included. All documentation components shall be completed in accordance with the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation (HABS standards) to the satisfaction of the City of Santa Monica and the HABS administrator. The HABS documentation shall be submitted to the City and National Park Service for transmittal to the Library of Congress, and archival copies shall be sent to the Santa Monica Public Library. **Mitigation Measure HIST-2: Interpretive Exhibit** The Applicant shall retain a Qualified Preservation Professional (defined as an architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture, pursuant to 36 CFR 61) to develop and implement a publically accessible interpretive exhibit (Exhibit), in consultation with the Applicant, that captures and	Significant unavoidable.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
		incorporates the important history, associations, and significance of the JWCI and CFDC, within the larger context of medical history, so that it is retained for future generations. The Exhibit's requirements shall be outlined in a technical memorandum, including the requirements for maintenance and operation of the Exhibit's elements. The interpretive Exhibit shall be aimed at actively illustrating the following: • The growth and development of the JWCI and CFDC within the larger context of local, state and national medical history. • The Exhibit should also document the construction history and architectural significance pertaining to the respected architects, Weldon J. Fulton (JWCI) and John Maloney (CFDC), for each property. • The historical associations and significance of Dr. Evis Coda (CFDC), The Exhibit shall include each of the following: • A permanent on-site exhibit, maintained by the Applicant. • A professionally conducted oral history program documenting the personal experiences of patients and staff members, which will be utilized within the Exhibit and later archived at the Santa Monica History Museum. The Applicant shall commission a Qualified Preservation Professional to prepare a technical memorandum detailing the Exhibits' requirements and implementation schedule and this memorandum shall be reviewed by interested parties, such as the Santa Monica History Museum and the Santa Monica Conservancy, and shall be prepared to the satisfaction of the City of Santa Monica. The Applicant shall submit quarterly reports (i.e., January, April, July, and October) prepared by a Qualified Preservation Professional documenting the progress of the Exhibit's implementation, and the Applicant shall submit documentation illustrating full implementation of the Exhibit to the City within 3 years of completion of construction. **Mitigation Measure HIST-3: Construction Monitoring** Due to the potential for damage from excavation and construction activities, as well as vibration, to 2208/2210 Santa Monica Boulevard, and in association with implementation of Mitigation Measure MM NOISE-1, the Qualified Preservation Professional shall monitor construction activities associated with the Project at regular intervals to address any unanticipated damage that may require preservation treatment, and minimize potential damage to historic materials. The Qualified Preservation Professional shall	

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
		document the construction monitoring process in digital photography, as well as monitoring logs, and prepare a final monitoring report to be submitted to the City's planning department.	
Cultural Resources - Archeological Resources			
Impact Statement CULT-ARCH-1: Sites S1, S2, S3, S4, and S5 were identified as having a moderate or high potential for prehistoric and/or historic-period archaeological resources. It is possible that physical remnants of prehistoric uses or former historic uses still exist at depth within these five development sites. Therefore, Project grading and excavation may encounter buried archaeological resources. As a result, construction may cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. Impacts to archaeological resources are considered potentially significant.	--	**MM-ARCH-1: Archaeological Monitoring of Ground Disturbing Activities** Prior to the issuance of a demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Qualified Archaeologist) and a Native American monitor from a tribe that is culturally and geographically affiliated with the Project site (according to the Native American Heritage Commission contact list for this project) to provide construction monitoring services for the Project. The Qualified Archaeologist, or an archaeological monitor working under their direct supervision, and the Native American monitor shall monitor all ground disturbance, such as clearing/grubbing, grading, trenching, or any other construction excavation activity, associated with Sites S1, S2, S3, S4, and S5 to a maximum depth of 6 feet (depth at which archaeological sensitivity decreases). The archaeological monitor shall be familiar with the types of resources (prehistoric and historic) that could be encountered. The frequency of archaeological and Native American monitoring shall be determined by the Qualified Archaeologist and shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Full-time archaeological and Native American monitoring may be reduced to part-time inspections, or ceased entirely, at any depth above 6 feet if determined adequate by the Qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and Native American monitor, and will focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event. **MM-ARCH-2: Evaluation/Treatment of any Archaeological Finds** In the event that historic (e.g., bottles, foundations, refuse dumps/privies, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
		are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. The Qualified Archaeologist around the find shall establish an appropriate buffer area where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the resources are prehistoric or Native American in origin, the Applicant shall coordinate with the City, Qualified Archaeologist, and Native American representatives regarding the treatment and curation of any prehistoric archaeological resources. Additionally, if a discovery is outside of Sites S1, S2, S3, S4, or S5, the Qualified Archaeologist shall determine the level of archaeological monitoring that is warranted during future ground disturbance in other portions of the Project Site. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to PRC Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City (and Native American representatives for prehistoric resources) to develop a formal treatment plan that would serve to reduce impacts to the resource. The treatment plan established for the resource shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a repository that meets the standards outlined in 36 Code of Federal Regulations (CFR) 79.9., if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes, or to an affiliated tribe for prehistoric materials, to be determined by the Qualified Archaeologist in consultation with the City, and with Native American representatives for materials that are prehistoric in nature. Disposition of human remains and associated funerary objects shall be determined through consultation with the Most Likely Descendant (MLD) and landowner (see MM-ARCH-4 below).	

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
		MM-ARCH-3: Final Archaeological Report) Prior to the release of the grading bond that is required for a grading permit to guarantee that grading will be completed in conformity with the approved building plans and terms of the grading permit, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Project applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the development and required mitigation measures.	
Impact Statement CULT-2-ARCH: The Project Site has been previously disturbed by the original construction of the former and existing uses. However, there are areas that have been subject to less disturbance and the Kizh Nation indicated that there could be human remains related to those who may have died while traveling along a former prehistoric trail and trade route (present-day Santa Monica Boulevard). Project grading and excavation may encounter buried human remains. As a result, construction may disturb human remains, including those interred outside of dedicated cemeteries. Impacts to human remains resources are considered potentially significant.	--	**MM-ARCH-4: Human Remains** If human remains are encountered unexpectedly during implementation of the Project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC. The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
		of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment. Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.	
Energy			
Impact Statement ENERGY-1: The Project would include sustainable design features that would improve energy efficiency beyond the standard regulatory requirements. Furthermore, the Project's land use characteristics (such as proximity to transit and a variety of uses) and location would minimize vehicle trips and VMT. As the Project would achieve greater than required energy efficiency, it would not result in the wasteful, inefficient, or unnecessary consumption of energy resources.	--	No mitigation measures are required.	Less than significant.
Impact Statement ENERGY-2: The Project would include a number of sustainable energy efficiency features to support the use of renewable energy and energy efficiency goals. The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	--	No mitigation measures are required.	Less than significant.
Geology and Soils			
Impact Statement GEO-1: The Project would not cause potential adverse environmental conditions involving fault rupture, strong seismic ground shaking, seismic-related ground failure (including liquefaction), or landslides. Also, while the Project could be subject to strong seismic ground shaking and	--	No mitigation measures are required.	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
seismic-related risks during an earthquake, compliance with applicable regulations and with the recommendations of the Final Geotechnical Reports would minimize associated risks. Therefore, impacts would be less than significant.			
Impact Statement GEO-2: The Project could result in unstable soil conditions and expansive soils if appropriate design measures are not taken. However, the Project would be required to meet State and City Building Code requirements and comply with the design recommendations of the Final Geotechnical Reports. Regulatory compliance would ensure that impacts related to unstable soil conditions and expansive soils, caused in whole or in part by the Project's exacerbation of the existing environmental conditions, would be less than significant.	--	No mitigation measures are required.	Less than significant.
Impact Statement GEO-3: The Project Site does not contain unique geologic features, and as such the Project would have no impact on such features. However, Project grading and excavation may encounter native soil/sediment associated with Older Quaternary Alluvium which has high potential for containing buried paleontological resources. As a result, Project construction activities may directly or indirectly destroy unique paleontological resources or sites, and a potentially significant impact could occur.	--	**MM-GEO-1: Paleontological Resources Investigation** Prior to start of any ground-disturbing activities (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil) for each construction site, the Applicant shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology standards (SVP, 2010). The Qualified Paleontologist shall conduct construction worker paleontological resources sensitivity training for appropriate construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project area and the procedures to be followed if they are found. The Applicant shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance. **MM-GEO-2: Paleontological Resource Monitoring of Ground Disturbing Activities** Full-time paleontological resources monitoring shall be performed by a qualified paleontological monitor under the direction of the Qualified Paleontologist (SVP, 2010) for ground disturbance in undisturbed soils below a depth of 6 feet. Full-time monitoring may	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
		be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Paleontologist. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils, in a radius of at least 50 feet, in order to recover the fossil specimens. Any significant fossils collected during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. The Qualified Paleontologist shall prepare a final monitoring and mitigation report to be submitted to the City. **MM-GEO-3: Evaluation/Treatment of Any Paleontological Finds** If construction or other Project personnel discover any potential fossils during construction, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and made recommendations as to the appropriate treatment. If the find is deemed significant, it shall be salvaged following the standards of the SVP (2010) and curated with a certified repository.	
Greenhouse Gas Emissions			
Impact Statement GHG-1: Impact Statement GHG-1: The Project would generate direct and indirect GHG emissions from construction and operational activities. The Project would be consistent with applicable GHG reduction plans, and other applicable plans, policies and regulations adopted for the purpose of reducing the emissions of GHGs including the City's LUCE, Sustainable City Plan, and Climate Action and Adaptation Plan; AB32 and SB 375; and the State Attorney General, OPR and Climate Action Team recommendations. Therefore, the Project's GHG emissions and associated impacts would be less than significant.	PDF-AQ1- and PDF-AQ-2 (see above) PDF-TR-2 (TDM Program) (see below)	No mitigation measures are required.	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
Hazards and Hazardous Materials			
Impact Statement HAZ-1: The Project would not create a significant hazard to the public or the environment through the routine transport, use, and disposal of the small quantities of hazardous. With compliance with manufacturer instructions and applicable federal, state and local health and safety regulations, this impact would be less than significant.		No mitigation measures are required.	Less than significant.
Impact Statement HAZ-2: Project construction activities could create a potential significant hazard to the public or environment due to the release of hazardous materials associated with the Open LUST case and former on-site service stations. Additionally, Project demolition activities could release ACMs and LBP that may be present in multiple existing on-site buildings to be demolished. These impacts would be less than significant level with compliance with applicable regulatory requirements and implementation of the prescribed mitigation measures.	--	**MM HAZ-1: Additional Assessment/Remediation - Site S3 and Site 2D/E.** Prior to the issuance of a grading permit for each site - Site S3 and Site 2D/E, additional assessment in the form of soil and soil vapor sampling shall be conducted to determine whether there is any soil or groundwater contamination associated with the former service station uses at these sites, once the existing on-site buildings/structures are demolished. If the additional assessment reveals concentrations of volatile organic compounds (VOCs) and/or other hazardous substances above applicable California Human Health Screening Levels (CHHSL), soil remediation and health and safety measures required by the applicable regulatory agencies [e.g., California Department of Toxic Substances (DTSC), Los Angeles Regional Water Quality Control Board (LARWQCB), etc.] shall be implemented by the Project Applicant during construction, which will be included in a Soils Management Plan and a Health and Safety Plan, as applicable (refer to Mitigation Measures HAZ-2 and HAZ-3). The additional assessment shall also include a survey to determine the presence of any underground storage tanks (UST) associated with the former on-site gas stations. If a UST is discovered, the Applicant shall notify the SMFD prior to tank removal and prepare a work plan for UST removal. The work plan shall be approved by the SMFD and shall identify methods/procedures to remove or neutralize any flammable materials and vapors in the UST prior to transport, and establish to the satisfaction of the SMFD that no release of hazardous materials has occurred or that the release of hazardous materials is otherwise addressed in the SMP. The UST shall be properly disposed of by a licensed contractor in accordance with applicable regulations.	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
		MM HAZ-2: Soil Management Plan [SMP] Should the assessments required under MM HAZ-1 above for Site S3 and Site 2D/2E reveal chemicals of concern above applicable CHHLs and for excavation activities associated with Site 2C and Site 2D/E, the Project Applicant shall retain a qualified environmental consultant to prepare a SMP, which will be submitted to DTSC, RWQCB, and/or City of Santa Monica Fire Department for review and approval prior to the commencement of excavation and grading activities. The recommendations of the applicable oversight agency shall be incorporated in the SMP. The SMP shall be implemented during excavation and grading activities on the identified Site to ensure that any contaminated soils are properly identified, excavated, and disposed of off-site, as follows: • The SMP shall be prepared and executed in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. The SMP shall require the timely testing and sampling of soils so that contaminated soils can be separated from inert soils for proper disposal. The SMP shall specify the testing parameters and sampling frequency. During excavation, Rule 1166 requires that soils identified as contaminated shall be sprayed with water or another approved vapor suppressant, or covered with sheeting during periods of inactivity of greater than an hour, to prevent contaminated soils from becoming airborne. Under Rule 1166, contaminated soils shall be transported from the Project Site by a licensed transporter and disposed of at a licensed storage/treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment. • During the excavation phase, the Applicant shall remove and properly dispose of contaminated materials in accordance with the provisions of the SMP. If soil is stockpiled prior to disposal, it will be managed in accordance with the Project's Storm Water Pollution Prevention Plan, prior to its transfer for treatment and/or disposal. All impacted soils would be properly treated and disposed of in accordance with SCAQMD Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil, as well as applicable requirements of DTSC and LARWQCB. • A qualified environmental consultant shall be present on the Site during grading and excavation activities in the known or suspected locations of contaminated soils or the UST, and shall be on call at other times as necessary, to monitor compliance	

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
		with the SMP and to actively monitor the soils and excavations for evidence of contamination. **MM HAZ-3: Health and Safety Plan [HASP]** Should the assessments required under MM HAZ-1 above reveal chemicals of concern above applicable clean-up goals, the Applicant shall commission a HASP to be prepared in compliance with Occupational Safety and Health Administration (OSHA) Safety and Health Standards (29 Code of Federal Regulations 1910.120) and Cal-OSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719) and submitted for review by the Department of Building and Safety. The HASP would address, as appropriate, safety requirements that would serve to avoid significant impacts or risks to workers or the public in the event that elevated levels of subsurface gases are encountered during grading and excavation. The HASP would also address potential vapor encroachment from the soil contamination into the subterranean levels of the building. As necessary, gas monitoring devices would be in place to alert workers in the event elevated gas or other vapor concentrations occur when basement slab demolition or soil excavation is being performed. Contingency procedures would be in place in the event elevated gas concentrations are detected, such as the mandatory use of personal protective equipment, evacuation of the area, and/or increasing ventilation within the immediate work area. Workers would be trained to identify exposure symptoms and implement alarm response. Construction fencing would be installed around development areas to restrict public access from surrounding properties and other phases of the Project Site, further reduce the potential for contaminated soils to become airborne, and provide additional distance between the public and excavation activities to allow for gas and vapor dilution. Vapor suppression measures also would be identified consistent with the SMP, as necessary, to avoid health hazards to adjacent properties. The HASP would have emergency contact numbers, maps to the nearest hospital, gas monitoring action levels, gas response actions, allowable worker exposure times, and mandatory personal protective equipment requirements. The HASP would be signed by all workers involved in the demolition and excavation of on-site soils to demonstrate their understanding of the risks of excavation. **MM-HAZ-4: Asbestos Containing Materials** Pursuant to SCAQMD requirements, testing for presence of ACM shall be conducted in the CFDC, JWCI, and SJF Buildings prior to	

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
		demolition of these structures. Any ACM found in these buildings, and the previously confirmed ACM in the vacant on-site apartments and associated parking structure, shall be removed by a licensed and certified asbestos abatement contractor prior to demolition of these buildings pursuant to SCAQMD Rule 1403 and Cal-OSHA Asbestos Regulations. **MM-HAZ-5: Lead Based Paints** Testing for the presence of LBP shall be conducted in the CFDC, JWCI, and SJF Buildings prior to demolition of these structures. Any LBP found in these buildings, and the previously confirmed LBP in the vacant on-site apartments and associated parking structure, shall be removed by lead-certified personnel following the Cal-OSHA lead standards contained in CCR Title 8, Section 1532.1 and lead-safe work practices prior to demolition of these buildings. An environmental contractor with California Department of Public Health certified workers shall be retained to carry out the work in compliance with the regulations that govern LBP.	
Impact Statement HAZ-3: Project construction could emit hazardous emissions and handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing school. However, through compliance with applicable regulations and manufacturer instructions, and implementation of mitigation measures, the Project would not expose a school to substantial health risks during construction with impacts being less than significant. Project operation would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste that would result in significant hazards to any school.	--	See MM-HAZ-1 through MM-HAZ-5 above.	Less than significant.
Impact Statement HAZ-4: The Project would not significantly impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The impact would be less than significant.	--	No mitigation measures are required.	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
Hydrology and Water Quality			
Impact Statement H/WQ-1: The Project would result in minor decreases rather than increases in both impervious surfaces and the overall amount of peak stormwater runoff flow from the Project Site. The Project would not substantially alter the existing drainage pattern of the site or area, including through either the alteration of the course of a stream or river or the addition of impervious surface, in a manner that would result in: (1) flooding on- or off-site; (2) exceedance of the capacity of existing or planned stormwater drainage systems; or (3) impedance or redirection of flows. Furthermore, the Project would not require or result in the relocation or construction of new stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project drainage impacts would be less than significant.	PDF-TR-1 (see below).	No mitigation measures are required.	Less than significant.
Impact Statement H/WQ-2: The Project could potentially contribute pollutants in stormwater runoff during Project construction and operation. However, with compliance with applicable water quality regulations, the Project would not: (1) violate water quality standards or waste discharge requirements or otherwise degrade surface or groundwater quality; (2) create or contribute substantial additional sources of polluted runoff or substantial erosion or siltation; (3) risk release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone; or (4) conflict with or obstruct implementation of a water quality control plan. Therefore, Project water quality impacts would be less than significant.	--	No mitigation measures are required.	Less than significant.
Impact Statement H/WQ-3: The Project would slightly decrease impervious surfaces at the Project Site, would not include groundwater withdrawals (other than, potentially, small amounts of groundwater	--	No mitigation measures are required.	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
associated with any required dewatering), would not overlay a designated groundwater recharge area, and would not result in a significant demand for water. Furthermore, a SGP does not yet exist for the Santa Monica Basin. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that it would impede sustainable groundwater management, and would not conflict with or obstruct implementation of an SGP. Project groundwater impacts would be less than significant.			
Land Use and Planning			
Impact Statement LU-1: The Project, with the approval of amendments to the HASP, amendments to the Development Agreement, Phase II Master Plan, Phase II Development Program, and associated entitlements, would be substantially consistent with adopted land use plans, policies, guidance, and regulations adopted for the purpose of avoiding or mitigating an environmental effect and, therefore, would not result in a significant environmental impact as a result of any plan inconsistencies. Therefore, impacts with respect to land use and planning would be less than significant.	PDF-TR-2 (see below).	No mitigation measures are required.	Less than significant.
Neighborhood Effects			
Impact Statement NHE-1: The Project's aesthetics, air quality, land use and noise impacts would be less than significant or less than significant after mitigation, and thus would result in less than significant neighborhood effects. Furthermore, while the Project could result in significant unavoidable construction vibration impacts to immediately adjacent vibration-sensitive medical uses, any such impacts would not represent neighborhood effects due to the restricted special extent of the impact. However, the Project would include significant unavoidable traffic impacts, including	PDF-AQ-1 (see above); PDF-NOI-1 and PDF-NOISE-2 (see below); PDF-TR—1 and PDF-TR-2 (see below).	MM-AIR-1 (see above); MM-NOISE-1 (see below); MM-TR-1, MM-TR-2, MM-TR-3, and MM-TR-4 (see below).	Significant unavoidable (operational intersection and street segment LOS).

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
impacts that could have considerable effects on the surrounding Mid-City neighborhood (e.g., significant operations-related intersection and street segment level of service impacts). Therefore, neighborhood effects impacts related to operational traffic would be significant unavoidable.			
Noise			
Impact Statement NOISE-1: Noise levels during construction activities would not exceed the noise standards established by the City. Therefore, impacts would be less than significant. Operation of the Project would increase noise levels at adjacent noise sensitive receptors due to traffic, mechanical equipment for the buildings, and use of outdoor open space; however, the noise increases would be substantially below the 5 dBA CNEL threshold. Therefore, the Project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in excess of City standards during construction or operations and impacts would be less than significant.	**PDF-NOISE-1 (Construction Noise):** The Applicant's construction contractor shall The Applicant's construction contractor shall require implementation of the following construction best management practices (BMPs) by all construction contractors and subcontractors working in and around the Project Site to reduce construction noise levels: • Project contractor(s) will equip all construction equipment, fixed and mobile, mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards; • On-site construction equipment staging areas will be located as far as feasible from noise and vibration sensitive uses. • In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. • As required by SMMC 9.21.140 B Screening, effective noise barriers will be designed and erected as needed to shield on-site uses from excessive construction-related noise. **PDF-NOISE-2: Exterior Mechanical Equipment Noise** Exterior mechanical and electrical equipment such as HVAC equipment would be screened in accordance with Section 9.21.140 of the SMMC.	No mitigation measures are required.	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
	In accordance with Section 4.12.130 of the SMMC, all outdoor mechanical equipment would be required to comply with noise limitation requirements provided in Section 4.12.060 of the SMMC.		
Impact Statement NOISE-2: Construction activities from the Project could result in excessive vibration levels, potentially resulting in structural damage impacts and impacts to vibration sensitive medical uses. After the implementation of Mitigation Measure NOISE-1, potential structural damage impacts would be less than significant; however, after the implementation of Mitigation Measure NOISE-2, potential impacts to vibration sensitive medical uses would be significant and unavoidable at nearby non-PSJHC owned medical office facilities. With respect to human annoyance, construction activities adjacent to or near inhabited structures would not result in excessive vibration levels, resulting in a less than significant impact. Operational activities would not result in excessive vibration levels to structures, vibration sensitive medical uses, or human annoyance, resulting in a less than significant impact.		**MM-NOISE-1: Construction Vibration** To reduce the potential for construction-related vibration effects to building structures, prior to the issuance of a building permit for a Site, PSJHC shall perform an inventory of the structural condition of buildings within 50 feet of Project construction. Based on the surveyed building's structure and condition, an acoustic specialist will determine the appropriate Caltrans vibration structural damage potential criteria, and for each piece of equipment, assess a standoff distance from the building. The construction contractor(s) shall restrict the use of equipment within the minimum applicable standoff distances to not exceed the building's applicable structural damage criteria. If construction is required within these minimum applicable distances, alternative equipment and methods, such as small bulldozers (less than 300 horsepower), smaller or alternative construction equipment, or alternative methods shall be used to reduce potential vibration levels to less than the building's applicable structural damage criteria. **MM-NOISE-2: Construction Vibration** To reduce the potential for construction-related vibration effects to any vibration sensitive medical uses, prior to the issuance of a building permit for Sites 2C, 2I, 2D/E, S1, S3 and S4, PSJHC shall perform an inventory of vibration-sensitive medical equipment and rooms/suites in the hospital and in the adjacent Medical Office Buildings, as well those along Santa Monica Boulevard and Broadway. PSJHC shall notify both the building owner/property manager and the building's medical office tenants in writing of PSJHC's need to inventory the building/tenant suite for vibration-sensitive medical equipment and rooms/suites with vibration-sensitive medical operations and to conduct the simulation(s). For the buildings identified to contain vibration sensitive medical uses and where determined to be potentially exposed to adverse vibration effects associated with construction activities by a qualified acoustical specialist, a construction simulation survey shall be undertaken outside of each building, replicating representative construction activities, such as the use of an excavator or the dropping of a heavy weight. The simulations shall be undertaken in an appropriate number of locations, as determined by an acoustical	Less than significant vibration impacts regarding structural damage and human annoyance. Significant unavoidable vibration impacts to vibration-sensitive medical uses not owned by Saint John's that do not participate in MM-NOISE-2.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
		specialist to allow evaluation of the proposed construction activities. Use of the vibration-sensitive equipment will be monitored by the applicable medical team during this exercise. The applicable medical team will confer with the construction team, including an acoustical specialist, after the simulation. If the simulation results indicate that either (a) construction vibration would exceed manufacturer's specifications for vibration-sensitive medical equipment or (b) hospital operating rooms or critical working areas would exceed the "Weighting factors for satisfactory magnitudes of building vibration with respect to human response" in ANSI/ASA S2.71-1983 (reaffirmed in 2012), Table A.1, then a detailed mitigation plan shall be prepared unless both the applicable medical team and the construction team agree that the construction vibration is not impacting medical equipment/procedures in a particular medical suite despite the manufacturer's specifications or weighting factors. If a mitigation plan is required, the construction team, including an acoustical specialist, shall prepare such plan relevant to such equipment or operations that is practicable for both the construction team and the applicable medical team. This will involve a combination of the judicious selection of construction equipment and techniques to minimize vibration at source, the sympathetic scheduling of the hours of construction and medical equipment usage/operations, the use of vibration isolation tables for particularly sensitive medical equipment/operations and the possible temporary relocation of affected medical equipment/operations. PSJHC shall use good faith efforts to secure the voluntary cooperation of the building owner/property manager and the building's medical office tenants in allowing PSJHC to perform the inventory, schedule the simulation(s), monitor the vibration-sensitive medical equipment or operations during the simulation(s), and provide input on practicable measures to include in the mitigation plan.	
Population and Housing			
Impact Statement PH-1: The Project would develop new medical uses and replacement and visitor housing, and would create new jobs, that would result in a net increase in employment in the City and region and an indirect demand for housing. These increases would be consistent with the growth projected in the City's LUCE and SCAG's 2016-	--	No mitigation measures are required.	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
2040 RCP/SCS. Therefore, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly, and impacts would be less than significant.			
Impact Statement PH-2: The Project would replace the 10 existing multi-family housing units on the Project Site with 10 new multi-family housing units. Therefore, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. The impact would be less than significant.	--	No mitigation measures are required.	Less than significant.
Public Services – Police Protection			
Impact Statement POLICE-1: The Project would develop new medical, healthcare-related, neighborhood commercial, and residential uses which would increase the daytime population and potentially increase the demand for police protection services to the Project Site. The increase in demand for police protection would be off-set through PSJHC site security features and compliance with City security and lighting requirements. With these site security features and regulatory compliance, the Project would not require new or physically altered police service facilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant.	--	No mitigation measures are required.	Less than significant.
Public Services – Fire Protection			
Impact Statement FIRE-1: The Project would increase the number of visitors and employees using the Project Site which would increase demand for fire protection services. The increase in demand for fire protection would be off-set through proposed water infrastructure improvements, fire prevention features, and regulatory compliance. Thus, the Project would not require new or physically altered fire protection service	--	No mitigation measures are required.	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
facilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant.			
Transportation			
Impact Statement TR-1: The Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, consistency with circulation plans/programs/ ordinances/policies impacts would be less than significant.	**PDF-TR-2 (TDM):** The Applicant shall implement TDM measures so as to not exceed the trip generation estimates calculated for the Future Years (2031 and 2042) in Tables 4.17-11 and 4.17-12 of the EIR. The specific TDM strategies to be implemented by the developer shall be finalized as part of the Development Agreement process. It is anticipated that the following TDM strategies will be implemented and/or maintained: a TDM Coordinator; Transportation Management Association (TMO); transit pass subsidies provided to employees by the Project Applicant; ridesharing (carpools and vanpools); parking pricing; Guaranteed Ride Home (GRH); bicycle facilities; carshare service; bicycle sharing areas; transportation information center and TDM website information; pedestrian wayfinding signage; and commuter club. To ensure that the trip generation estimates calculated for the Interim Year (2031) and Future Year (2042) in Table 4.17-11 are not exceeded, a period of annual monitoring and reporting shall be undertaken for the Project and incorporated into the Development Agreement. The Applicant shall summarize the results of the trip monitoring program, determine whether trip reduction goals and/or Average Vehicle Ridership (AVR) targets are being achieved, and describe the TDM efforts in place to reduce vehicular trip making, in an annual report delivered to the City. The City, at its discretion, shall determine the type of enforcement and may require implementation of additional TDM strategies and possible monetary (or other) penalties if annual monitoring determines that the trip generation estimates are being exceeded and/or that AVR targets are not being met.	No mitigation measures are required.	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
Impact Statement TR-2a: The Project would result in per capita VMT that is lower than existing Citywide per Capita VMT rate, and would not conflict with CEQA Guidelines Section 15064, Subdivision (b). Therefore, less than significant VMT impacts would occur.	TDM-TR-2 (see above).	No mitigation measures are required.	Less than significant.
Impact Statement TR-2b: The Project would exceed City of Santa Monica (HCM) and City of Los Angeles (CMA) operational level of service thresholds at multiple study intersections and street segments during each of the traffic analysis scenarios (2019, 2031, and 2042), including at a total of 14 intersections and six street segments in 2042.[3] As no mitigation is available to reduce these impacts to less than significant levels, significant unavoidable operational intersection and street segment level of service impacts would occur. Other potential conflicts with applicable programs, plans, ordinances and policies addressing the circulation system (e.g., CMP facilities) would be less than significant.	TDM-TR-2 (see above).	**MM-TR-1: Intersection 70** The Project Applicant shall reconfigure the existing northbound and southbound approaches of Intersection 70 (Centinela Avenue & Santa Monica Boulevard) to provide one left-turn lane and one shared through/right-turn lane at each approach. The Project Applicant shall seek approval from the City of Los Angeles to implement this improvement. **MM-TR-2: Intersection 77** If agreed to by the Big Blue Bus and Metro, the eastbound Big Blue Bus bus stop from the near side of the intersection shall be consolidated with the existing Metro bus stop on the far side of the intersection. The Project Applicant shall reconfigure the eastbound approach of Intersection 77 (Bundy Drive & Santa Monica Boulevard) to provide one through lane and one right-turn lane. The Project Applicant shall seek approval from the City of Los Angeles to implement this improvement. **MM-TR-3: Intersection 79** If the Martin Expo Town Center Project does not restripe the northbound approach at Intersection 79 (Bund Drive & Olympic Boulevard) to provide dual left-turn lanes, this restriping shall be undertaken by the Project Applicant. The Project Applicant shall seek approval from the City of Los Angeles to implement this improvement. **MM-TR-4: Intersection 81** The Project Applicant shall restripe the southbound approach at Intersection 81 (Bundy Drive & I-10 Eastbound On-Ramp) to add a second left-turn lane. This would entail converting the HOV lane on	Significant unavoidable.

3 If appropriate approvals are granted by the City of Los Angeles (and by Caltrans in the case of Intersection 81) in conjunction with MM-TR-1 through MM-TR-4, impacts at Intersections 70, 77, and 81 would be mitigated to less than significant levels (e.g., 10 rather than 14 intersections would be significant unavoidably impacted).

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
		that ramp to a mixed-flow lane. The Project Applicant shall seek approval from Caltrans and the City of Los Angeles to implement this improvement.	
Impact Statement TR-3: The Project would not substantially increase hazards due to a geometric design feature or incompatible uses. Therefore, impacts related to hazards due to design features would be less than significant.	--	No mitigation measures are required.	Less than significant.
Impact Statement TR-4: Adequate emergency access is currently available to the Project Site and would be maintained during Project construction and operation. Therefore, the impacts of the Project on emergency access would be less than significant.	**PDF-TR-1: Construction Traffic Management Plan** The Applicant shall prepare, implement, and maintain a Construction Traffic Management Plan (Plan) to address construction traffic, parking, access and safety impacts during the construction period. The Plan shall be submitted to the City for review and approval prior to the issuance of grading permits, and be designed to accomplish the following: • Reduce construction traffic impacts on the surrounding street network; • Minimize construction parking impacts; • Ensure traffic safety and emergency around the Project Site during the construction period; • Prevent substantial construction truck traffic through residential neighborhoods; and • Provide for coordination of Project construction activities with those of nearby construction projects. The Plan shall include the following at a minimum: <u>Ongoing Requirements Throughout the Duration of Construction:</u> • Implementation of a detailed work zone plan for temporary lane, sidewalk, and bicycle lane closures (e.g., flagmen, directional signage, etc.). The Plan shall include specific information regarding the Project's construction activities that may disrupt	No mitigation measures are required.	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
	normal pedestrian and traffic flow, and the measures to address these disruptions. Further, the Plan shall address construction parking and impacts to existing parking in adjacent off-site areas. The Plan shall be reviewed and approved by the Traffic Engineering Division prior to commencement of construction and implemented in accordance with this approval. • Any work within the public right-of-way (ROW) shall be performed between 9:00 AM and 4:00 PM. This work includes dirt and demolition material hauling and construction material delivery. Work within the public ROW outside of these hours shall only be allowed with under an after-hours construction permit. • Streets and equipment shall be cleaned in accordance with established Public Works Department requirements. • Trucks shall only travel on a City-approved construction route. Truck queuing/staging shall not be allowed on Santa Monica streets. Limited queuing may occur on the construction site itself. • Materials and equipment shall be minimally visible to the public; the preferred location for materials is to be onsite, with a minimum amount of materials within a work area in the public ROW, subject to a current Use of Public Property Permit. • Any requests for work before or after normal construction hours within the public ROW shall be subject to review and approval through the After Hours Permit process administered by the Building and Safety Division. • Provision of off-street parking for construction workers, which may include the use of a remote location with shuttle transport to the site, if determined necessary by the City of Santa Monica.		

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
	Project Coordination Elements That Will Be Implemented Prior to Commencement of Construction: • The Applicant shall advise the traveling public of impending construction activities (e.g., information signs, portable message signs, media listing/notification, and implementation of an approved Plan). • The Applicant shall obtain a Use of Public Property Permit, Excavation Permit, Sewer Permit, or Oversize Load Permit, as well as any Caltrans permits required, for any construction work requiring encroachment into public rights- of-way, detours, or any other work within the public ROW. • The Applicant shall provide timely notification of construction schedules to all affected agencies (e.g., Metro. Big Blue Bus, Police Department, Fire Department, Public Works Department, and Planning and Community Development Department) and to all owners and residential and commercial tenants of property within a radius of 500 feet. • The Applicant shall coordinate construction work with affected agencies in advance of start of work. Approvals may take up to two weeks per each submittal. Coordination with Metro regarding construction activities that may impact Metro bus lines or result in closures lasting over six months shall be initiated at least 30 days in advance of construction activities. • The Applicant shall obtain Transportation Engineering Division approval of any haul routes for earth, concrete, or construction materials and equipment hauling.		

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
Tribal Cultural Resources			
Impact Statement TCR-1: The Project would not result in a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074, since no tribal cultural resources were identified as located within the Project Site, or its immediate adjacency. No impacts to tribal cultural resources would occur.	--	No mitigation measures are required.	No impact.
Utilities – Water Supply			
Impact Statement WS-1: The Project would connect to the existing municipal water lines in the streets adjacent to the Project Site, and these lines have adequate capacity to serve the Project. No new or expanded municipal water lines would be required. While minor municipal water line relocation or replacement would be required, the environmental effects associated with this relocation/replacement would be less than significant.	PDF-TR-1 (see above).	No mitigation measures are required.	Less than significant.
Impact Statement WS-2: The City would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.	--	No mitigation measures are required.	Less than significant.
Utilities - Wastewater			
Impact Statement WW-1: The Project would generate additional wastewater that would be conveyed to nearby mainline sewers and the HTP for treatment. The Project would not require the relocation or construction of new or expanded wastewater treatment facilities. The Project would require the relocation or construction of new wastewater conveyance infrastructure. However, the relocation or construction of this infrastructure	PDF-TR-1 (see above).	**MM-WW-1: Santa Monica Blvd. and Downstream Sewers** Prior to the issuance of the development review permit for the 2C building, additional sewer monitoring shall be required from the Project Applicant's civil engineer to determine if future project flows (during dry and wet weather conditions) will cause the City's 12-inch line on Santa Monica Boulevard to exceed the hydraulic planning criteria on page 47 in the City's 2017 Sanitary Sewer Master Plan or its successor to. The primary criteria used to establish adequately-sized sewer piping is if the PWWF depth to diameter ratio is less than 0.75, and if the minimum velocity is 2 ft/s. The	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
would not cause significant environmental effects. Therefore, impacts would be less than significant.		Project Applicant shall be responsible for any additional improvements identified as being required by the analysis. If the study indicates exceedances of the hydraulic planning criteria due to project flows, Saint John's shall perform sewer upgrades prior to issuance of a Certificate of Occupancy for the 2C building. **MM-WW-2: Broadway Sewers** Prior to the issuance of the development review permit for the earlier of the S3 building or the S4 building, Saint John's shall prepare an updated sewer study to be reviewed and approved by the City. Such study shall determine if future project flows (during dry and wet weather conditions) will cause the City's 12-inch and 21-inch sewer lines on Broadway to exceed the hydraulic planning criteria on page 47 in the City's Sanitary Sewer System Master Plan). The primary criteria used to establish adequately-sized sewer piping is if the Peak Wet Weather Flow (PWWF) depth to diameter ratio is less than 0.75, and if the minimum velocity is 2 ft/s. If the study indicates exceedances of the hydraulic planning criteria due to project flows, Saint John's shall perform sewer upgrades prior to issuance of a Certificate of Occupancy for the earlier of the S3 or S4 building.	
Impact Statement WW-2: The Project would generate additional wastewater that would ultimately be conveyed to the HTP for treatment. The HTP has capacity to serve the Project in addition to the provider's existing commitments. Thus, impacts would be less than significant.	--	No mitigation measures are required.	Less than significant.
Utilities - Solid Waste			
Impact Statement SW-1: The Project would generate additional solid waste that would require landfill disposal. However, through compliance with applicable solid waste diversion requirements, the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts would be less than significant.	--	No mitigation measures are required.	Less than significant.

Environmental Impact	Project Design Features (PDFs)	Mitigation Measures (MMs)	Level of Significance After Mitigation
Impact Statement SW-2: The Project would be implemented in compliance with all applicable management and reduction statues and regulations related to solid waste. Therefore, the impact would be than significant.	--	No mitigation measures are required.	Less than significant.

SOURCE: ESA 2019

CHAPTER 1
Introduction

This Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) to evaluate the potential environmental impacts of the Providence Saint John's Health Center (PSJHC) Phase II Project (Phase II Project or Project). PSJHC, the Project Applicant, proposes various legislative amendments, other City approvals, and the expansion of its health care and related facilities on the approximately 20.72-acre (913,093-square-foot) PSJHC Campus (Project Site).

1.1 Purpose of the Draft EIR

The purpose of this EIR is to inform decision-makers and the general public of the environmental impacts resulting from the Project. The City of Santa Monica (City) is the Lead Agency under the California Environmental Quality Act (CEQA) responsible for preparing this Draft EIR. This EIR has been prepared in conformance with CEQA (California Public Resources Code Section 21000 et seq.), and the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.). The principal State CEQA Guidelines sections governing content of this document are Sections 15120 through 15132 (Contents of an EIR), and Section 15161 (Project EIR).

The City is responsible for processing and approving the Project pursuant to CEQA Statute Section 21067. The City will consider the information in the Project's Draft EIR, along with other information that may be presented during the CEQA process, including the Initial Study and a Final EIR. The EIR will be used in connection with all other permits and all other approvals necessary for the construction and operation of the Project. The EIR will be used by the City and other responsible public agencies that must approve activities undertaken with respect to the Project.

In accordance with Section 15121 of the State CEQA Guidelines, this EIR provides specific information regarding the environmental effects associated with the development of the Project, and ways to minimize any significant environmental effects through mitigation measures or reasonable alternatives to the Project. Section 15382 of CEQA Guidelines defines "significant environmental effect on the environment" as a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by the project including land, air, water minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. For some effects, significant environmental impacts cannot be mitigated to a level considered less than significant; in such cases, impacts are considered significant and unavoidable. In accordance with Section 15091 of the State CEQA Guidelines, if a public agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts where impacts cannot be mitigated to less than significant levels), the agency must state in writing the

specific reasons for approving the project, based on the Final EIR and any other information in the public record for the project. This is known as a "statement of overriding considerations."

This document analyzes the environmental effects of the Project to the degree of specificity appropriate to the Project, as required under Section 15146 of the State CEQA Guidelines. This analysis considers the construction and operational activities associated with the Project, to determine the short-term and long-term environmental effects. This EIR discusses both the direct and indirect impacts of this Project, as well as the cumulative impacts associated with other past, present, and reasonably foreseeable future projects.

1.2 Public Review Process

In compliance with the State CEQA Guidelines, the City has provided opportunities to participate in the environmental process. During preparation of the Draft EIR, an effort was made to contact various State, regional, and local government agencies and other interested parties to solicit comments on the scope of the EIR and to inform the public of the Project. As further described below, this included the distribution of a Notice of Preparation (NOP), which included noticing for a Public Scoping Meeting.

1.2.1 Notice of Preparation

Pursuant to the provision of Section 15082 of the State CEQA Guidelines, the City circulated an NOP to State, regional, and local agencies, and members of the public for a 32-day period commencing April 10, 2017 and ending May 11, 2017. The purpose of the NOP was to formally convey that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. The NOP was distributed to applicable federal, state, regional, and city agencies, the State Clearinghouse at the California Governor's Office of Planning and Research, neighborhood groups, and occupants and owners within a 1,000-foot radius of the Project Site. In addition, the NOP was posted in the Santa Monica Daily Press and the City's City Planning Division website. See Appendix A-1, *Notice of Preparation*, of this Draft EIR.

1.2.2 Public Scoping Meeting

The NOP included notification that a public scoping meeting would be held to further inform public agencies and other interested parties of the Project and to solicit input regarding the Draft EIR. The public scoping meeting was held on April 24, 2017 from 6:00 P.M. to 7:30 P.M. at the McKinley Elementary School Auditorium, located at 2401 Santa Monica Boulevard, Santa Monica, California 90404. The meeting included a presentation of the Project and an overview of the CEQA process followed by an open house format which provided interested individuals, groups, and public agencies the opportunity to view materials, ask questions, and provide oral and written comments to the City regarding the scope and focus of the Draft EIR as described in the NOP. In addition, approximately ten (10) individuals attended the public scoping meeting. The presentation materials and other documentation from the Scoping Meeting are provided in Appendix A-2, *Scoping Meeting Materials*, of this Draft EIR.

1.2.3 Comments Received

Nine (9) written comment letters and emails responding to the NOP were submitted to the City. Responses to the NOP were provided by various public agencies and organizations, including the State of California Governor's Office of Planning and Research (OPR) State Clearinghouse and Planning Unit, California Department of Transportation, California Native Heritage Commission, Los Angeles County Metropolitan Transportation Authority, South Coast Air Quality Management District, and four individuals/other interested parties. Public comments received during the NOP circulation period are provided in Appendix A-3, *NOP and Scoping Meeting Comments*, of this Draft EIR and summarized in the Executive Summary, Section D, *Areas of Controversy and Issues to be Resolved*.

1.3 Scope of the EIR

This EIR assesses the potential environmental impacts that could occur with implementation of the Projects. Section 15064 of the CEQA Guidelines states that in evaluating the significance of the environmental effect of a project, the Lead Agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project.

Based on the City's assessment of the Project and the results of the EIR scoping process, this EIR addresses environmental effects for the following topics:

- Aesthetics (Visual Character, Views, Light and Glare, Shading)
- Air Quality/Health Risk
- Construction Effects
- Cultural Resources - Historical Resources
- Cultural Resources - Archaeology and Paleontology
- Energy
- Greenhouse Gas Emissions
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use/Planning
- Neighborhood Effects
- Noise and Vibration
- Population and Housing
- Police Protection
- Fire Protection
- Transportation
- Tribal Cultural Resources
- Water

- Wastewater
- Solid Waste

This EIR addresses the issue referenced above and identifies potentially significant direct and indirect impacts resulting from construction and operation of the Project. Additionally, the EIR provides Project Design Features and feasible mitigation measures (where necessary) to reduce or avoid adverse environmental effects.

Consistent with CEQA Guidelines (Section 15126.6[d]), this EIR includes the assessment of a reasonable range of alternatives to the Project that could feasibly attain most of the project objectives while avoiding or substantially lessening the environmental effects of the Project. This analysis is included in Chapter 5.0, *Alternatives*.

Chapter 6, *Other CEQA Considerations*, of this EIR addresses environmental topics required by CEQA that are not covered within the other chapters of the EIR, including: (1) significant unavoidable impacts, (2) irreversible environmental changes, (3) growth inducing impacts, (4) potential secondary effects, and (5) environmental effects found not to be significant.

1.4 Format of the Draft EIR

The Draft EIR includes an Executive Summary, eight Chapters, and appendices, which are organized as follows:

ES **Executive Summary.** This section of the Draft EIR provides an overview of the entire document in a concise, summarized format. It briefly describes the Project (location and key Project features), the CEQA review process and focus, identifies effects found to be significant and unavoidable, identifies areas of controversy, provides a summary of the Project alternatives (descriptions and conclusions regarding comparative impacts), and provides a summary of Project impacts, Project Design Features and mitigation measures, and the level of impact significance following implementation of mitigation measures.

1. **Introduction.** This section provides a summary of the Project, describes the purpose of the EIR, including CEQA compliance requirements, steps undertaken to date regarding implementation of the CEQA process, and also summarizes the Draft EIR's content and organization.

2. **Project Description.** This section describes the location, objectives, and physical and operational characteristics of the Project.

3. **General Description of Environmental Setting.** This section presents an overview of the Projects' environmental setting, including on-site and surrounding land uses. This section also provides a list of cumulative projects (i.e., under construction, approved, and pending projects in the City) that have been considered in the analysis of potential contributions of the Projects to cumulative impacts.

4. **Environmental Impact Analysis.** This section contains the analysis for each of the environmental topics that are listed above. The analysis for each environmental topic includes a discussion of the environmental setting, regulatory framework, thresholds of significance, analysis methodology, Project characteristics and/or Project Design Features

that would affect the environmental impacts, analysis of Projects impacts, and the Projects contribution to cumulative impacts

5. **Alternatives.** This section describes a reasonable range of alternatives to the Project, including: Alternative 1 - No Project/No Build Alternative, Alternative 2 – Tier 1 Only; Alternative 3 – Reduced Healthcare Uses with Tier 2 Housing on South Campus; Alternative 4 – Reduced Master Plan; Alternative 5 – Partial Master Plan. This section also evaluates the environmental effects of the alternatives for each issue area analyzed in the EIR.

6. **Other CEQA Considerations.** This section includes a discussion of issues required by CEQA that are not covered in other sections. This includes significant unavoidable impacts, reasons why the Project is being proposed notwithstanding significant unavoidable impacts, significant irreversible environmental changes, growth-inducing impacts, potential secondary effects caused by the implementation of the mitigation measures for the Project, and effects found not to be significant.

7. **References.** This section lists the references and sources used in the preparation of this Draft EIR.

8. **List of EIR Preparers and Organizations/Persons Contacted.** This section lists the persons, public agencies, and organizations that were consulted or who contributed to the preparation of this EIR.

The Environmental Analyses in this EIR are supported by the following appendices:

- Appendix A – Notice of Preparation, Scoping Meeting Materials, and NOP and Scoping Meeting Comments
  - A-1 NOP
  - A-2 Scoping Meeting Materials
  - A-3 NOP and Scoping Meeting Comments
- Appendix B – Air Quality/Health Risk Technical Data
- Appendix C – Cultural Resources Report
- Appendix D – Energy Calculations
- Appendix E - Preliminary Geotechnical Report
- Appendix F – Paleontological Resources Report
- Appendix G – Greenhouse Gas Technical Data
- Appendix H – Phase I Environmental Site Assessment
- Appendix I – Hydrology Study
- Appendix J – Noise Technical Data
- Appendix K – Public Services Information
  - K-1 Santa Monica Police Department Correspondence
  - K-2 Santa Monica Fire Department Correspondence
- Appendix L – Traffic Impact Assessment and Parking Study
- Appendix M – Utilities and Service Systems Information

- M-1 Water Supply Assessment
- M-2 Fire and Domestic Water Study
- M-3 Sanitary Sewer Study

1.5 Public Review of the Draft EIR

The Draft EIR is subject to a 45-day review period in which the document is made available to the public as well as responsible and trustee agencies and interested parties. In compliance with the provision of Sections 15085(a) and 15087(a)(1) of the State CEQA Guidelines, the City, serving as the Lead Agency: (1) published a Notice of Availability (NOA) of a Draft EIR which indicated that the Draft EIR was available for review at Santa Monica City Hall (1685 Main Street, Room 212, Santa Monica, CA 90401); (3) posted the NOA and the Draft EIR on the City's website (http:// https://www.smgov.net/Departments/PCD/Environmental-Reports/PSJHC-Master-Plan-EIR/); (4) prepared and transmitted a Notice of Completion (NOC) to the State Clearinghouse; (5) sent a NOA to all property owners within 1,000 feet of the Project Site; and (6) sent a NOA to the last known name and address of all organizations and individuals who previously requested such notice in writing or attended public meetings about the Project. Proof of publication is available at the City. The public review period commenced on July 30, 2019 and will end on September 13, 2019 for a total of 46 days.

Any public agency or members of the public desiring to comment on the Draft EIR must submit their comments in writing or send them via email to the following address prior to the end of the public review period:

Mail: Rachel Kwok, Environmental Planner
Planning & Community Development Department
1685 Main Street, Room 212
Santa Monica, CA 90401

Fax: (310) 458-8341
Email: Rachel.Kwok@smgov.net

Upon the close of the public review period, the City will proceed to evaluate and prepare responses to all relevant oral and written comments received from public agencies and other interested parties during the public review period. A Final EIR will then be prepared. The Final EIR will consist of the Draft EIR with revisions as necessary, written comments received during the public circulation period for the Draft EIR with City responses to those comments, and a Mitigation Monitoring and Reporting Program (MMRP). After the Final EIR is completed, the Final EIR will be made available at least 10 days prior to its certification to commenting agencies and the public. The Final EIR will be presented to the Planning Commission and to the City Council for certification concurrent with Project approval.

CHAPTER 2
Project Description

2.1 Introduction

Providence Saint John's Health Center (PSJHC, the Project Applicant), proposes various legislative amendments, other City approvals, and the expansion of its health care and related facilities as part of the PSJHC Phase II Project (Phase II Project), to be implemented over a period of over 20 years, which would improve the existing health center with up to approximately 682,700 new square feet of floor area (660,150 square feet above-grade and 22,550 square feet below grade floor area), 10 replacement multifamily housing units, and enhanced vehicular and pedestrian circulation connections. The PSJHC Campus, which includes all of the areas contemplated for new development or redevelopment under the Phase II Project ("Phase II Development Sites" or "Project Site"), is subject to an existing Development Agreement (DA) approved by the City in 1998 and subsequently amended in 2011 and 2017, the current term of which lasts until 2053. The Phase II Project consists of the following actions and/or approvals: (1) Amendments to the City's Hospital Area Specific Plan (HASP) in relation to the Phase II Project; (2) a Third Amendment to the DA (which may be incorporated into an amended and restated DA); (3) The Phase II Master Plan; (4) a Child Care Implementation Plan for Phase II; (5) an Amended Santa Monica Community Access Plan for Phase II; (6) the Phase II Development Program, consisting of ten (10) Phase II Project buildings and related open space and infrastructure improvements on the North and South Campuses, which would be reviewed pursuant to the City's Development Review Permit (DRP) process following approval of the Phase II Master Plan; (7) an application for a vesting tentative subdivision map; and (8) a street vacation application.

2.2 Project Location and Surrounding Uses

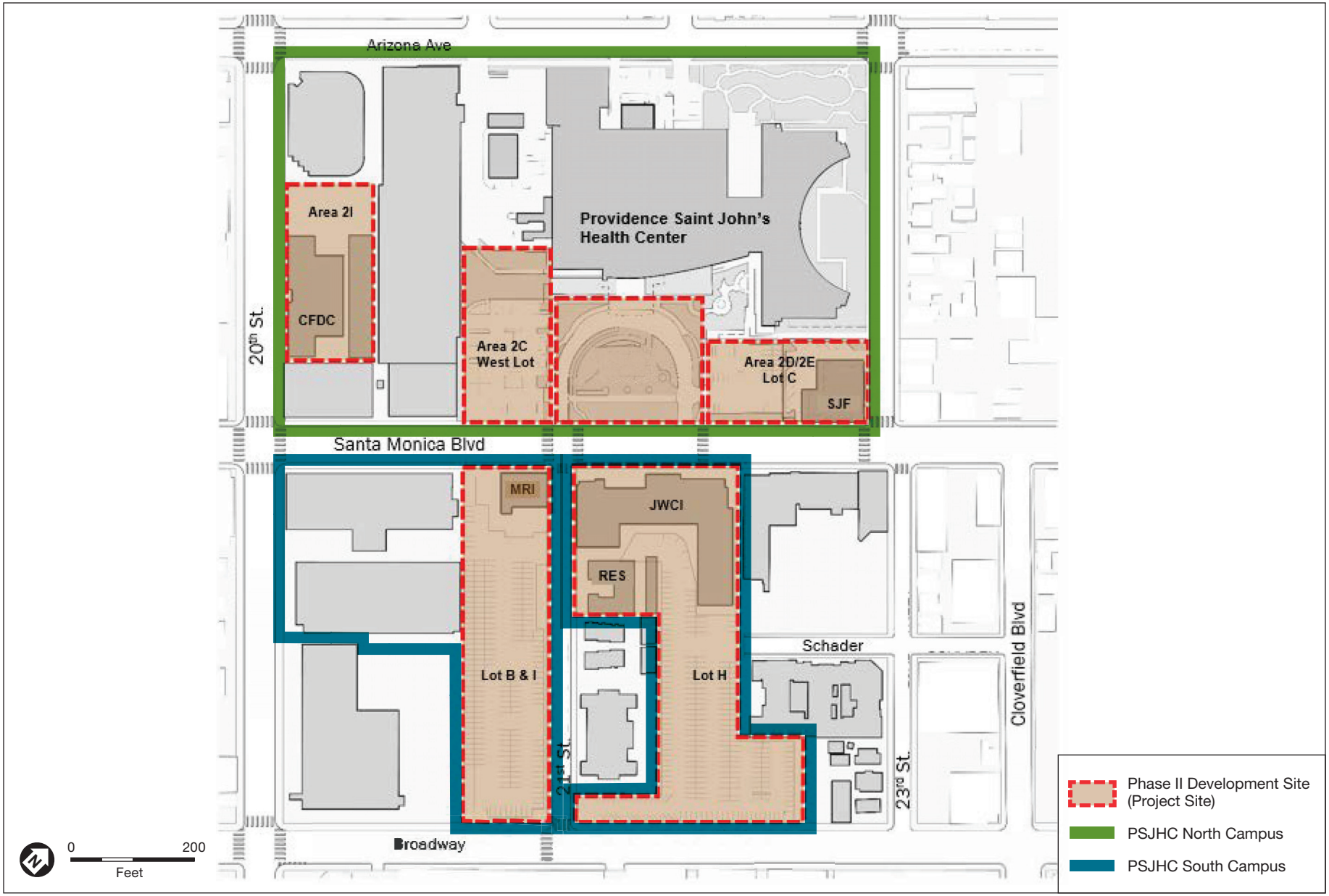
The Project Site is located in the City of Santa Monica, in the western portion of Los Angeles County. All Phase II Development Sites are located on the PSJHC Campus, as noted previously, which itself is located within the City's Healthcare Mixed Use District in an area generally bounded by Arizona Avenue to the north, Broadway to the south, 20th Street to the west, and 23rd Street to the east. The location of the PSJHC Campus and surrounding uses in the area is illustrated below in **Figure 2-1**, *Project Location and Aerial Photograph*, while the various Phase II Development Sites on the PSJHC Campus are shown in **Figure 2-2**, *Phase II Development Sites*. Overall, the Phase II Development Sites have a total land area of approximately 407,100 square feet. The PSJHC Campus is located on both the north and south sides of Santa Monica Boulevard. PSJHC primarily serves Santa Monica and the neighboring communities included in Los Angeles County's Service Planning Area 5. These neighboring communities include Venice, Culver City, Mar Vista, Brentwood, West Los Angeles, West Hollywood, Pacific Palisades, Marina Del Rey, Beverly Hills, Westchester, Ladera Heights, Palms, Cheviot Hills/Rancho Park, and Malibu.

SOURCE: NAIP, 2014 (Aerial).

Providence Saint John's Health Center Phase II Project

Figure 2-1
Project Location and Aerial Photograph

ESA



D170258.00

SOURCE: Perkins Eastman, 2018

Providence Saint John's Health Center Phase II Project

Figure 2-2
Phase II Development Sites

ESA

Over 70 percent of PSJHC patients are located in Los Angeles County's Service Planning Area 5. The PSJHC Campus is accessible to the regional transportation network, located approximately 0.9-mile north of the Santa Monica Freeway (Interstate 10) ramps at Cloverfield Boulevard. Additionally, the Project Site is located in close proximity to two Expo Light Rail stations, approximately 0.8-mile northeast of the 17th Street/Santa Monica College Station (at 17th Street and Colorado Avenue) and 0.8-mile northwest of the 26th Street/Bergamot Station (located at 26th Street and Olympic Boulevard) Expo Light Rail stations.

Bus transit service within one-half mile of the Project Site includes the Santa Monica Big Blue Bus transit service routes 1, 4, 41-42, R10, and Metro service route 704, with stops along Santa Monica Boulevard and 20th Street. These bus stops are all located within two blocks of all Phase II Development Sites on the PSJHC Campus.

Three Breeze Bike Share Hubs are located within one-half mile of the Project Site: (1) at Broadway and 20th Street, (2) at 20th Street and Arizona Avenue, and (3) at Broadway and Cloverfield Boulevard. The Breeze Bike Share program provides quick and convenient access to bicycles at various hubs for quick trips around the City, and serves as an alternate mode of transportation for "first mile/last mile" connections to bus and light rail transit. In the Project Site vicinity, Broadway and Arizona Avenue have east-west protected bike lanes.

The area surrounding the PSJHC Campus contains a mixture of commercial (including medical) buildings on 20th Street, Arizona Avenue, Santa Monica Boulevard and Broadway and multifamily residential buildings on Arizona Avenue, 21st Street and 23rd Street (see further discussion below). Figure 2-1 illustrates the existing on-site buildings and development in the immediate vicinity.

2.3 Site Background and Existing Conditions

2.3.1 Background and History

2.3.1.1 The Development Agreement

PSJHC was founded in Santa Monica by the Sisters of Charity of Leavenworth in 1939 as a non-profit hospital and health care facility. Over the next several decades, PSJHC expanded its facilities to meet the increasing health care needs of Santa Monica and surrounding communities. During the Northridge Earthquake (1994), several PSJHC buildings suffered significant damage. The North Wing of PSJHC's main hospital building was deemed structurally unsafe and had to be demolished. Other PSJHC facilities were closed for nine months before buildings were structurally retrofitted and allowed to reopen and provide healthcare services. In response to the earthquake, PSJHC applied for a DA in 1996. The Santa Monica City Council approved the DA effective in July 1998.

As noted previously, the DA provides for two phases of development. Phase I, which was completed in 2014, involved the serial demolition and reconstruction of PSJHC core hospital facilities on the North Campus in a smaller configuration than previously existed. As part of Phase I, PSJHC core hospital facilities were reduced from 662,000 square feet of floor area to 475,000 square feet of floor area, and PSJHC licensed beds were reduced from a pre-earthquake peak of

501 to a total of 266. While Phase I included the rebuilding of PSJHC core hospital facilities, the currently contemplated Phase II Project includes the expansion of PSJHC facilities on designated sites on the North Campus and South Campus. The DA provides for ongoing community benefits that PSJHC is required to provide through the term of the DA (i.e. until 2053). These Community Benefits include an annual Community Benefit Plan which incorporates a Santa Monica Community Access Plan (SMCAP). The SMCAP provides cash support and healthcare and related services targeted to non-profit agencies that serve Santa Monica residents, the Santa Monica Malibu Unified School District, and free community services to the general Santa Monica Community.

The DA requires that a Phase II Master Plan be approved by the City Council prior to the approval of the DRPs for the proposed Phase II Project buildings. The Phase II Master Plan is a comprehensive master plan that governs the Phase II portion of the PSJHC Campus, including with respect to development, uses, circulation, parking, open space, and timing for implementation of the Phase II Master Plan. The Phase II Master Plan establishes the development parameters for new buildings and physical changes to the PSJHC Campus that will address the facility and healthcare needs of the community served by PSJHC. The Phase II Master Plan includes infrastructure improvements and new open space areas in order to integrate the Phase II Project development into the PSJHC Campus (including buildings constructed as part of Phase I) and existing surrounding urban development. The Phase II Master Plan provides for the development of ten (10) new Phase II Project buildings totaling 660,150 square feet of above-grade floor area and 22,550 square feet of below-grade floor area on approximately 407,100 square feet of land area on the PSJHC Campus.

The DA's provisions for Phase II established vested rights for up to 799,000 square feet of development on the North and South Campuses. (DA Section 3.7.3(a)-(b).) In addition, the DA provided vesting protections for certain Phase II uses. Phase II uses include various hospital and health care uses, health and wellness uses, education and conference facilities, visitor housing, replacement multifamily housing units, and parking. For the North Campus Phase II Development Sites, the original DA allowed DRPs for these buildings to be brought forward independently from any Phase II master planning process. For the South Campus, the original DA required that the South Campus be comprehensively planned by PSJHC and approved by the City through a South Campus Master Plan that would establish height, parking, location of uses and phasing/timing. The original DA allowed the South Campus Master Plan and DRPs for the South Campus Phase II Project buildings to be approved concurrently by the Planning Commission. The DA was subsequently amended in 2011 and 2017, as discussed further below.

2.3.1.2 The First Amendment to the Development Agreement (2011)

In 2011, the City approved the first amendment to the DA (2011 Amendment), which extended PSJHC vested rights for Phase I and allowed PSJHC to continue to rely upon a combination of leased and owned parking in-lieu of constructing an on-site parking structure beneath the North Campus Entry Plaza a/k/a Mullin Plaza, as originally conceived in the DA. The 2011 Amendment required PSJHC to provide additional community benefits, including implementation and maintenance of a transportation demand management (TDM) program, implementation of neighborhood protection measures developed in response to input from the community, financial

contributions towards a Transportation Management Association (TMA) Feasibility Study, and enhancements to the 17th Street/Santa Monica College Station of the Expo Light Rail Line.

2.3.1.3 Phase II Planning and Applications

Providence Health & Services assumed sponsorship of PSJHC from the Sisters of Charity of Leavenworth in March 2014 and, shortly thereafter, commenced the Phase II planning process. In Spring 2015, PSJHC filed eight (8) DRP applications, an application for an amendment to the DA that would provide the Planning Commission with the discretion to extend the vesting deadline for Phase II Project buildings because PSJHC advised the City that it would not be able to meet the vesting deadlines in the last approved version of the DA, and an application for the South Campus Master Plan. These applications were deemed complete by the City on June 5, 2015.

2.3.1.4 The 2nd Amendment to the Development Agreement (2017)

On April 25, 2017, the Santa Monica City Council approved a second amendment to the DA that resulted in the following:

- Changed the South Campus Master Plan to a Phase II Master Plan encompassing all of Phase II, on both the North and South Campuses.
- Changed the DA to require approval of the Phase II Master Plan prior to approval of the individual DRPs for Phase II Project buildings.
- Established the City Council as the decision-making body for the Phase II Master Plan.
- Required that all Phase II development be consistent with the approved Phase II Master Plan.
- Incorporated a good faith requirement to negotiate the extension of the Phase II vesting deadlines and the provision of additional community benefits by PSJHC in a Third Amendment to or restatement of the DA, to be considered concurrently with the Phase II Master Plan.

2.3.2 Existing Site Conditions

The PSJHC Campus is located in the City's Healthcare Mixed-Use District, as indicated above, which is a district that includes the City's two hospitals (PSJHC and UCLA Medical Center, Santa Monica), as well as medical office buildings. Existing development in the area consists of hospital, commercial, and residential buildings of one to twelve stories in height. The Project Site vicinity includes older residential structures ranging from one to eight stories (or up to 84 feet) in height, as well as newer hospital buildings (up to 92 feet in height), older commercial buildings ranging from one to twelve stories (up to 168 feet) in height, two hotels (the Gateway Hotel Santa Monica at 1920 Santa Monica Boulevard and the Ambrose at 1255 20th Street), two schools (Santa Monica Malibu Unified School District's McKinley Elementary School and Saint Anne School) and newer condominium buildings.

The existing square footage and land uses associate with each of the various Phase II Development Sites are summarized below in **Table 2-1**, *Existing Phase II Development Site Summary*, while the detailed characteristics of each of the sites are described in the paragraphs below. PSJHC's South Campus has approximately 225,700 square feet of total land area. The land areas for the North Campus Phase II sites are included in the paragraphs below.

TABLE 2-1
EXISTING IMPROVEMENTS/DEVELOPMENT ON PHASE II SITES SUMMARY

Site	Site Area	Existing Improvement	Floor Area for Existing Buildings	Parking Capacity	Height	Principal Uses
North Campus						
2C	45,200 sf	West Parking Lot and landscape	n/a	90 vehicles	n/a	Surface parking for visitors and patients
2I	45,000 sf	Child & Family Development Center	34,670 sf[1]	n/a	2 Above-Grade Stories, 1 basement level	Day care Child & Family Development Center Use
		CFDC Poolhouse	585 sf[1]	n/a	1 Above-Grade Story	Maintenance and storage
2D/E	39,000 sf	Saint John's Health Center Foundation Building ("2221 Building")[1] and related surface parking	10,800 sf[1]	24 vehicles	2 Above-Grade Stories	Office/meeting space for Saint John's Foundation
		Parking Lot C	n/a	48 vehicles	n/a	Surface parking for physicians
Mullin Plaza Site	52,200 sf	Entry plaza/vehicle drop-off/pick-up/open space	n/a	10 vehicles	n/a	Entry plaza/vehicle drop-off/pick-up/open space
South Campus - South Campus Land Area is 225,700 sf						
S1/S3		Two Temporary MRI Modular Buildings	2,675 sf	n/a	1 Above-Grade Story	Imaging
		Parking Lot B	n/a	139 vehicles	n/a	Surface parking for visitors and patients
		Parking Lot I	n/a	145 vehicles	n/a	Surface parking for employees/staff
S2		Parking Lot H (portion)	n/a	304 vehicles total in Lot H	n/a	Surface parking for employees/staff
S4 and Saint John's Square		John Wayne Cancer Institute ("2200 Santa Monica Boulevard")	51,055 sf[1]	n/a	2 Above-Grade Stories, 1 Subterranean Level	Medical Research, including clinics, laboratories, offices, and meeting space
		10-unit Apartment Building ("1417-1423 Twenty-First Street")	10,270 sf[1] (10 two-bedroom, one-bathroom units, per Rent Control Board records)	n/a	2 Above-Grade Stories	Multifamily dwelling units (Vacant)
		Parking Lot H (portion)	n/a	304 vehicles total in Lot H	n/a	Surface parking for employees/staff
S5		Parking Lot H (portion)	n/a	304 vehicles total in Lot H	n/a	Surface parking for employees/staff

Notes: sf = square feet; grey shading indicates existing on-site buildings.

[1] Building floor area and height per DA, Exhibit B

SOURCE: PSJHC, 2017.

2.3.2.1 Development Sites

Site 2C

Site 2C is located on the PSJHC North Campus along Santa Monica Boulevard as shown in Figure 2-2 and is approximately 45,200 square feet of land area. This site is currently developed with a surface parking lot (the West Lot) containing capacity for 90 vehicles. The West Lot is used for visitor and patient vehicles that are dropped off with the valet in Mullin Plaza entry driveway (described further below). Site 2C has approximately 145 feet of frontage along the north side of Santa Monica Boulevard, between 20th Street and 23rd Street. Vehicle access to/from the West Lot is provided via the signalized Mullin Plaza driveways on Santa Monica Boulevard. Site 2C includes a landscaped area to the north of the West Lot, landscaping to buffer the West Lot from the sidewalk along Santa Monica Boulevard, and landscaping within the West Lot. One *Magnolia Grandiflora* street tree is planted in a tree well along Santa Monica Boulevard.

Development immediately adjacent to the east of Site 2C is the Mullin Plaza. Immediately to the north is a portion of the PSJHC North Campus containing the mechanical plant for the existing hospital building constructed as part of Phase I (The Howard Keck Diagnostic & Treatment Center ["Keck Building"]) and Chan Soon-Shiong Center for Life Sciences ("CSS Building", approximately 92 feet in height). Immediately to the west is a seven-story/84-foot-tall medical office building (2021 Santa Monica Boulevard) and a 5 story/43-foot-tall parking structure, both of which share a property line with Site 2C. Immediately to the south is Santa Monica Boulevard, with the PSJHC South Campus located across Santa Monica Boulevard further to the south. Also located along Santa Monica Boulevard to the west of Site 2C are a 12-story/168-foot-tall medical office building (2001 Santa Monica Boulevard) and a six-story/110-foot-tall medical office building (2020 Santa Monica Boulevard).

Site 2D/E and Mullin Plaza Site

Site 2D/E is located on the PSJHC North Campus at the northwest corner of 23rd Street and Santa Monica Boulevard as shown in Figure 2-2 and has approximately 39,000 square feet of land area. Site 2D/E is developed with a surface parking lot (Lot C) containing capacity for 48 vehicles and a two-story concrete office building of 10,800 square feet located at 2221 Santa Monica Boulevard with surface parking (24 spaces) that serves the office building. Lot C is used for physician parking. The entire office building is occupied by the Saint John's Health Center Foundation and its associated surface parking is used by Foundation visitors and employees.

The Mullin Plaza site is located on a portion of 2121 Santa Monica Boulevard (APN 4276-025-062) between Sites 2C and 2D/E as shown on Figure 2-2 and has approximately 52,200 square feet of land area. The Mullin Plaza site includes the main vehicular access to the PSJHC Phase I development with a one-way semi-circle driveway with the ingress driveway from Santa Monica Boulevard on the east and the egress driveway to Santa Monica Boulevard on the west. There is a private driveway connecting the egress and ingress driveways located on the Mullin Plaza site that runs parallel to Santa Monica Boulevard and allows valets to bring cars from the West Lot (located on Site 2C) to the front of the Health Center without exiting onto Santa Monica Boulevard (the "Valet Road"). Within the semicircular driveway, there is an approximately 17,700-square-foot open space for use by patients, visitors, and employees. There are also landscaped areas located to

the northeast and northwest of the Entry Plaza driveways and a landscaped area located along Santa Monica Boulevard in front of the Valet Road.

Vehicular access to Lot C is via the Mullin Plaza driveway on Santa Monica Boulevard. Vehicular ingress to the Foundation's parking lot is from a driveway off of 23rd Street with vehicular egress from a second driveway on to Santa Monica Boulevard. The existing office building located at 2221 Santa Monica Boulevard has no setbacks from the property lines along Santa Monica Boulevard or 23rd Street. Three *Ficus Microcarpa* street trees are planted in tree wells along Santa Monica Boulevard in front of 2221 Santa Monica Boulevard. One *Eriobotrya Deflexa* street tree is planted in front of Mullin Plaza. There are no street trees in the 23rd Street parkway.

Development immediately to the east of Site 2D/E is 23rd Street, with a one-story commercial building (2301 Santa Monica Boulevard), a surface parking lot, and a three-story apartment building (1347 23rd Street) across 23rd Street. Immediately to the north is the existing Phase I CSS Building (2121 Santa Monica Boulevard), a four-story/92-foot-tall building. Immediately to the west of Site 2D/E is the Mullin Plaza Site. Immediately to the west of the Mullin Plaza Site is Site 2C, which is currently improved with surface parking (the West Lot). Immediately to the south is Santa Monica Boulevard, with the existing two-story John Wayne Cancer Institute building (2200 Santa Monica Boulevard), a one-story brick building (2232 Santa Monica Boulevard), and a four-story brick medical office building (2216 Santa Monica Boulevard) located across Santa Monica Boulevard.

Site 2I

Site 2I is located on the PSJHC North Campus at 1339 20th Street (APN 4276-027-018) as shown in Figure 2-2 and has approximately 45,000 square feet of land area. Site 2I is developed with the existing Child & Family Development Center, which consists of a two-story commercial building with a basement totaling approximately 34,670 square feet and a one-story, approximately 585-square-foot pool house. The building is currently occupied by PSJHC's Child & Family Development Center, which provides mental health outpatient services, a therapeutic preschool, and various child development education and outreach resources. The building is also home to PSJHC's Early Childhood Directions Program (child care), which is currently licensed to provide childcare to 61 children. The Early Childhood Directions Program satisfies the DA requirement for PSJHC to provide 49 spaces of full-day child care, including a minimum of 21 full-day infant/toddler spaces. From January 2014-December 2016, an average of 47% of the children in the Early Childhood Directions Program were children of PSJHC employees with the remaining 53% being children of Santa Monica residents or persons working in Santa Monica.[1]

The Site has 300 feet of frontage along the east side of 20th Street between Santa Monica Boulevard and Arizona Avenue. The existing building is set back five feet from the lot line along 20th Street. Site 2I contains three parking stalls used for loading. The parking stalls are accessible from a private

[1] Per the DA Section 1.8.1(c), PSJHC is required to utilize the following enrollment priorities: (1) children of PSJHC employees desiring full-time child care, (2) children of PSJHC employees desiring part-time care as long as that full-time space will be shared with another employee desiring care for the remaining time in that space, (3) children of Santa Monica residents desiring full-time child care, and (4) children of those working in Santa Monica desiring full-time care

alley running north-south and connecting to Arizona Avenue, located immediately to the east of Site 2I. One *Jacaranda Mimosifolia* street tree is planted in the 20th Street parkway.

Development immediately to the south of Site 2I is a seven-story/84-foot-tall medical building (2021 Santa Monica Boulevard). Its associated 43-foot-tall parking garage and private alley are located east of Site 2I. Immediately to the north is a five-story/86-foot-tall medical office building (1301 20th Street) which shares a property line with Site 2I. Immediately to the west is 20th Street, with a four-story medical office building (1919 Santa Monica Boulevard), a two-story physical health rehabilitation center building (1338 20th Street), and a one-story physical health rehabilitation center building (1320 20th Street) further to the west across 20th Street. Immediately to the south is a twelve-story/168-foot-tall medical office building (2001 Santa Monica Boulevard).

Sites S1 & S3 (South Campus - West Side)

The S1 and S3 Sites are located on the west side of the South Campus between Santa Monica Boulevard and Broadway as shown in Figure 2-2. The S1 and S3 Sites are currently improved with surface parking lots containing capacity for 139 (Lot B) and 145 (Lot I) vehicles, respectively, and two temporary modular buildings that were constructed during Phase I for PSJHC MRI facilities. Lot B is used for visitor and patient vehicles that are dropped off with the valet in Mullin Plaza. Lot I is used for employee/staff parking. Vehicular access to the surface parking lot is via two driveways on 21st Street. The surface parking lot is set back approximately eight feet from the lot line for most of the frontage along 21st Street, with a portion set back a greater distance behind a landscaped area. Three *Ficus microcarpa* street trees are planted in tree wells along Santa Monica Boulevard, five *Jacaranda Mimosifolia* street trees line the 21st Street parkway, and one *Corymbia Ficifolia* street tree is planted in a tree well along Broadway.

Development adjacent to Sites S1 & S3 to the north across Santa Monica Boulevard includes Site 2C, which is currently improved with an existing surface parking lot used by PSJHC (West Lot). To the northwest along Santa Monica Boulevard are the existing six-story/110-foot-tall medical office building (2020 Santa Monica Boulevard) and the existing twelve-story/168-foot-tall medical office building (2001 Santa Monica Boulevard). To the east, across 21st Street, are the following existing buildings: (a) a two-story medical building that is the current home of the John Wayne Cancer Institute (2200 Santa Monica Boulevard) and is proposed for demolition as part of the Phase II Project, (b) a vacant two-story residential apartment building (1417 21st Street) that is owned by PSJHC and proposed for demolition as part of the Phase II Project, (c) a one-story residential apartment building (1423 21st Street) that is not a part of the PSJHC Campus, and (d) an eight-story senior housing building (1441 21st Street) called Geneva Plaza that is also not a part of the PSJHC Campus. To the west is a six-story/110-foot-tall medical office building (2020 Santa Monica Boulevard), a four-story/40-foot-tall parking structure at 1414 21st Street, and the two- to three-story/70-foot-tall Frontier Communications building at 2001 Broadway. To the south, across Broadway, is a one-story commercial building containing the Back on Broadway restaurant (2024 Broadway) and a two-story commercial building containing Bruder Releasing, Inc. and the Weinzoff Chiropractic and Wellness Center (2020 Broadway).

Site S2

Site S2 is located on the southeast portion of the PSJHC Campus on two lots with the addresses 2207 and 2213 Broadway (APNs 4275-006-026, 4275-006-025) as shown in Figure 2-2. Site S2 is developed with a portion of a surface parking lot that is used by PSJHC (Lot H). Lot H, which spans Sites S4, S5 and S2, contains a total parking capacity of 304 vehicles and is used for employees/staff parking. Lot H is accessible via a driveway on Schader Drive and two driveways on 21st Street. Lot H is set back zero feet from the lot line along Broadway and zero feet from the lot line along 21st Street. Two *Lophostemon Confertus* street trees are planted in tree wells along Broadway.

Immediately to the east of Site S2 is a surface parking lot used by the one-story commercial building located at 2101-2225 Broadway. Immediately to the north is a three-story/42-foot-tall condominium building (1440 23rd Street). To the west is Site S5, currently a surface parking lot used by PSJHC (a portion of Lot H). To the south, across Broadway, is a one-story creative office/studio building at 2218 Broadway.

Site S4

Site S4 is located at 1417-1423 21st Street, 2200 Santa Monica Boulevard, and 2201 Broadway (APNs 4275-007-002, 4275-007-001, 4275-007-003), as shown on Figure 2-2. Site S4 is developed with the existing two-story John Wayne Cancer Institute Building (2200 Santa Monica Boulevard), an existing vacant ten-unit rent-controlled multifamily apartment building (1417-1423 21st Street), and a paved surface parking lot (a portion of Lot H) that is used by PSJHC. Lot H, which spans Sites S4, S5, and S2, contains a total parking capacity of 304 vehicles and is used for employees/staff parking. The John Wayne Cancer Institute Building (2200 Santa Monica Boulevard) has approximately 51,055 square feet of floor area located within two above-grade stories and one subterranean level. Lot H is accessible via a driveway on Schader Drive and two driveways on 21st Street. The existing John Wayne Cancer Institute building is set back between 13 feet and 32 feet from Santa Monica Boulevard and approximately seven feet from 21st Street. The existing vacant ten-unit multifamily apartment building at 1417-1423 21st Street is set back from 21st Street approximately 15 feet. Three *Ficus Microcarpa* street trees are planted in tree wells along Santa Monica Boulevard and six *Jacaranda Mimosifolia* street trees are planted along 21st Street.

Development to the east of Site S4 includes a one-story medical office building at 2210 Santa Monica Boulevard. To the north, across Santa Monica Boulevard, is the Mullin Plaza and Site 2D/E (currently developed with a surface parking lot, Lot C). Immediately to the west are Sites S1 and S3, which are currently improved with the two (2) temporary MRI modular buildings and surface parking Lots B and I. Immediately to the south is Site S5, which is currently improved with surface parking Lot H.

Site S5

Site S5 is located at 2201 Broadway and 1453 21st Street (APNs 4275-007-001, 4275-007-009) as shown on Figure 2-2. This site is developed with a surface parking (a portion of Lot H) that is used by PSJHC. Lot H, which spans Sites S4, S5, and S2, contains a total parking capacity of 304

vehicles and is used for employees/staff parking. Four *Corymbia Ficifolia* street trees are planted along Broadway. Lot H is accessible via a driveway on Schader Drive and two driveways on 21st Street.

Development to the east of Site S5 includes Site S2, which is currently improved with surface parking (a portion of Lot H) used by PSJHC. Immediately to the north of Site S5 is Site S4, which is currently improved with surface parking (a portion of Lot H) used by PSJHC and the John Wayne Cancer Institute. Immediately to the west is Geneva Plaza (1441 21st Street), an eight-story/84-foot-tall senior housing building. To the south, across Broadway, is a one-story commercial building (2202 Broadway) and another one-story creative office/commercial building (2112 Broadway).

2.3.2.2 Existing Streets

The PSJHC Campus is located north and south of Santa Monica Boulevard between 20th Street and 23rd Street. The North Campus extends to Arizona Avenue to the north, and the South Campus extends to Broadway to the south. Figure 2-2 illustrates the existing streets around PSJHC Campus.

Santa Monica Boulevard between 20th Street and 23rd Street

Between 20th Street and 23rd Street, Santa Monica Boulevard is an east-west street with four vehicle lanes and left-turn and right-turn channelization provided for traffic turning north and south on 20th Street, south on 21st Street, north on 22nd Street (into the North Campus driveway), and north and south on 23rd Street. The intersections of Santa Monica Boulevard and 20th Street, Santa Monica Boulevard and 21st Street, Santa Monica Boulevard and 22nd Street (into the North Campus driveway), and Santa Monica Boulevard and 23rd Street are controlled by traffic signals. Pedestrian countdown heads are installed on all approaches and crosswalks are striped across each leg of each intersection at Santa Monica Boulevard and 20th Street, 21st Street and 22nd Street. The intersection of Santa Monica Boulevard and 23rd Street is controlled by traffic signals, with striped crosswalks and pedestrian countdown heads across three legs of the intersection (with the exception of the east side of the intersection). There are no parking meters on Santa Monica Boulevard between 23rd Street and 20th Street.

Santa Monica Boulevard is currently an auto-oriented roadway that provides surface street access across the City. Between 23rd Street and 20th Street, this roadway supports a mix of commercial, service and institutional uses, including medical office buildings, restaurants, and a Best Western Hotel.

Broadway between 20th Street and 23rd Street

Between 20th Street and 23rd Street, Broadway is an east-west street with two vehicle lanes and left-turn and right-turn channelization provided for traffic turning north and south on 20th Street. The intersection of Broadway and 20th Street is controlled by a traffic signal, pedestrian countdown heads are installed on all approaches, and crosswalks are striped across each leg of the intersection. The intersection of 21st Street and Broadway is controlled by a pedestrian yield sign and the crosswalk is striped across Broadway. The intersection of 23rd Street and Broadway is controlled by a striped crosswalk across 23rd Street. Between 20th Street and 23rd Street, Broadway has east-west bike lanes and metered parallel parking on both sides of the street. There is a total of 60

existing parking spaces on Broadway between 20th Street and 23rd Street. Broadway is the City's major east-west bicycle corridor and provides bicycle access across the City. Between 23rd Street and 20th Street, Broadway supports a mix of commercial uses, including creative office, and a restaurant (Back on Broadway) as well as the eight-story Geneva Plaza senior housing building.

21st Street between Broadway and Santa Monica Boulevard

Between Broadway and Santa Monica Boulevard, 21st Street is a one-way street with one vehicle lane running south between Santa Monica Boulevard and Broadway. The intersection of 21st Street and Broadway is controlled by a pedestrian yield sign and the crosswalk is striped across Broadway. The intersection of 21st Street and Santa Monica Boulevard is controlled by a traffic signal. 21st Street has metered parallel parking on both sides of the street. There is a total of 35 existing parking spaces on 21st Street between Broadway and Santa Monica Boulevard. Between Broadway and Santa Monica Boulevard, 21st Street is a tree-lined roadway that supports PSJHC John Wayne Cancer Institute and temporary MRI modular buildings, parking uses for PSJHC, and residential uses.

20th Street between Arizona Avenue and Santa Monica Boulevard

Between Arizona Avenue and Santa Monica Boulevard, 20th Street is a north-south street with four vehicle lanes and left and right-turn channelization for traffic turning east and west on Santa Monica Boulevard and Arizona Avenue. The intersections of 20th Street and Santa Monica Boulevard and 20th Street and Arizona Avenue are controlled by traffic signals. Pedestrian countdown heads are installed on all approaches and crosswalks are striped across each leg of the intersections. In the immediate Project vicinity, 20th Street is a tree-lined roadway that supports a mix of residential and commercial uses, including the Ambrose Hotel.

23rd Street between Arizona Avenue and Santa Monica Boulevard

From Arizona Avenue to Santa Monica Boulevard, 23rd Street is a north-south street with two vehicle lanes and metered parallel parking on both sides of the street. South of Santa Monica Boulevard, 23rd Street becomes one-way going north with curbside parallel parking on both sides of the street. The intersection of 23rd Street and Santa Monica Boulevard is controlled by traffic signals. On three legs of the intersection, pedestrian countdown heads are installed and striped crosswalks exist. There is no pedestrian crossing on the east leg of the intersection.

Schader Drive Between the South Campus and 23rd Street

Schader Drive between the South Campus and 23rd Street is a two-way street. The vehicular egress from Providence Saint John's surface parking lot located on Sites S4 and S5 (Lot H) is directly onto Schader Drive.

2.4 Planning and Zoning

The PSJHC Campus and all Phase II Development Sites are governed by the DA, the City's 2010 Land Use and Circulation Element (LUCE), the 2015 Zoning Ordinance (except as overridden by the DA), and the HASP, as amended in 1998. The PSJHC Campus and all Phase II Development

Sites are governed by the DA until 2053. The following describes the land use regulations applicable to the Project Site and Phase II Project per the DA.

2.4.1 Development Agreement

2.4.1.1 Height and Floor Area

The DA established Phase II height limits for the North Campus sites and Floor Area for both the North Campus sites and the South Campus. For the North Campus, the DA establishes Height and Floor Area for each of the following three Phase II Development Sites: Site 2I, Site 2C, and Site 2D/E. (DA Sections 3.5.2 and 3.7.3(a)) The DA further provides that PSJHC may shift Floor Area between these three sites, subject to City approval. (DA Section 3.7.3 (a).) For the South Campus, the DA establishes an overall Floor Area of 396,500 square feet. (DA Section 3.7.3(b).) Per the DA, the height limits for South Campus buildings are to be established in the Phase II Master Plan. Such heights may not impede Floor Area. (DA Section 3.6.1.) The overall Floor Area for both the North Campus sites and South Campus is 799,000 square feet.

2.4.1.2 Uses

The DA also specified Uses for Phase II (both North and South Campuses). (DA Section 3.7.2(a)-(b).) The Uses included in the Phase II Master Plan are shown below in **Table 2-2**, *Summary of Select Phase II Uses*. Per the DA, any floor area for Medical Office use is deducted from and reduces the amount of floor area for the Hospital/Health Care use. (DA Section 3.7.2(a).) As discussed in Section 2.6.2, the Phase II Master Plan includes (and PSJHC is proposing a DA amendment to allow) an additional 50,000 square feet of Hospital/Health Care uses (404,000 square feet instead of 354,000 square feet) with no increase in the overall floor area for Phase II.

TABLE 2-2
SUMMARY OF SELECT PHASE II USES

Use	Max. Floor Area/Units Per DA
Hospital/ Health Care	354,000 sf*
Medical Research Facilities	140,000 sf
Health & Wellness Center	90,000 sf
Education & Conference Center	70,000 sf
Child & Family Development Center	50,000 sf
Medical Office	50,000 sf
Health Related Services	40,000 sf
Day care	25,000 sf
Restaurants	10,000 sf
Neighborhood Commercial Uses	5,000 sf
Visitor Housing	100 units
Multifamily Replacement Housing	10 units

* As indicated in Section 2.6.2, PSJHC is proposing a DA amendment to allow an additional 50,000 square feet of Hospital/Health Care uses (404,000 square feet instead of 354,000 square feet) with no increase in the overall floor area for Phase II.

SOURCE: PSJHC, 2017

2.4.2 Development Agreement Phase II Master Plan Requirement

The DA requires preparation and approval of a Phase II Master Plan prior to the approval of DRPs for any of the Phase II Project buildings. A detailed description of the Phase II Master Plan is provided below under Section 2.6, Description of the Phase II Project.

2.4.3 Land Use and Circulation Element and Healthcare Area Specific Plan

As noted above, the entire PSJHC Campus (including all Phase II Development Sites) is designated Healthcare Mixed-Use in the Land Use and Circulation Element of the City's General Plan (LUCE). The Healthcare Mixed-Use designation is one of the LUCE's Employment and Commerce districts. The Healthcare Mixed-Use designation allows for a variety of uses designed to support PSJHC and UCLA, the City's two hospitals, including hospital, medical office, pharmacies, residential care, rehabilitation and outpatient clinics, affordable, workforce and market-rate housing targeted at hospital employees, extended stay lodging for patient families, and supporting retail uses (LUCE p. 2.1-57). The LUCE did not establish new development standards for the Healthcare Mixed Use designation. Instead, the LUCE deferred to the standards contained in the HASP (2010 LUCE, pp. 2.1-54 and 2.6-48).

The HASP was adopted in 1988 and revised in 1993 and 1998. The HASP was revised in 1998 concurrently with the PSJHC DA. The HASP defers to the DA with respect to development standards and use regulations for the PSJHC Campus. Specifically, HASP Objective Number 12 establishes two "SJ Overlays," SJ-N and SJ-S, covering the North and South Campuses, respectively. The HASP provides that "the development standards, including heights and floor areas, for the SJ-S Overlay shall be established in a new South Campus Master Plan required by the [DA] between the City of Santa Monica and Saint John's." (HASP, p. 57)

2.4.4 Zoning

The City's Zoning Ordinance was updated in 2015 to implement the LUCE. The City's Zoning Ordinance update was adopted by City Council on June 23, 2015 and went into effect on July 24, 2015. Since its adoption, the Zoning Ordinance has been amended several times. The Zoning Ordinance contains a zoning designation that is generally applicable to the PSJHC Campus. However, the DA overrides the Zoning Ordinance during the term of the DA (i.e. until 2053).

The PSJHC Campus is generally zoned Healthcare Mixed Use in the City's Zoning Ordinance. Development standards in the Healthcare Mixed Use district allow for height up to five stories (or 70 feet) with a maximum FAR of 2.5.

The Healthcare Mixed Use district is intended to provide for the future orderly expansion of the City's hospital and related health care facilities in order to meet the needs of both the community and region while protecting the integrity of the surrounding neighborhoods (Zoning Ordinance Section 9.13.010).

There is a small portion of the S5 Site which is zoned Mixed-Use Boulevard Low. This is the parcel located at the northeast corner of Broadway and 21st Street at 1453 21st Street (APN 4275-007-009). Development standards in the Mixed-Use Boulevard Low district allow for height up to three stories (or 36 feet) with a maximum FAR of 1.75 (100% Affordable Housing Projects are allowed up to 47 feet and 2.0 FAR).

The Mixed-Use Boulevard Low district is intended to facilitate the transformation of sections of boulevards into vibrant, highly walkable areas with broad, pedestrian-friendly sidewalks, trees, landscaping, and local-serving uses with new buildings that step down in relationship to the scale and character of adjacent low density neighborhoods (Zoning Ordinance Section 9.11.010).

2.5 Statement of Project Objectives

Section 15124(b) of the CEQA Guidelines requires a project description to contain a statement of a project's objectives and Section 15124(b) requires that the statement of objectives includes the underlying purpose of the project. The Project applicant has identified the following objectives that apply to the Phase II Project that is analyzed in this EIR.

Objective 1: Health Care and Related Uses and Facilities – Ensure that PSJHC will function as part of an integrated health services delivery system that provides a range of care for Santa Monica and surrounding communities including acute care, outpatient (ambulatory) treatment, health and medical research, illness and disease prevention, community health education, and patient and family supportive services. In particular, PSJHC seeks to provide modern, state-of-the-art facilities within Santa Monica's Healthcare Mixed Use District with sufficient floor area and appropriate floor plates for the following health care and related services:

- Acute Care – Additional acute care services including in-patient hospital beds.
- Ambulatory (Outpatient Care) – Ambulatory health care services, potentially including services in the following areas: cardiovascular, women and children, neuroscience, cancer, joint replacement and sports medicine, surgery, and molecular pathology, histology and cytology.
- Medical Research – A new research facility for the John Wayne Cancer Institute that meets the needs of contemporary medical research and connects medical research with related clinical services.
- Education and Conferencing – Facilities for education and conferencing activities including (i) an auditorium to accommodate large group conferences such as medical/scientific symposia and (ii) smaller conference rooms/classrooms to facilitate smaller conferences and meetings.
- Visitor Housing – Short-term housing for patients, their family members, visiting health care professionals, and participants in conferences and seminars at PSJHC.
- Restaurants and Neighborhood Serving Uses – Restaurants/food service and other neighborhood-serving uses for use by PSJHC workforce, visitors, patients and neighbors and to activate the pedestrian areas in the vicinity of Mullin Plaza, Saint John's Square and Santa Monica Boulevard.

Objective 2: Required Uses and Facilities – Ensure that PSJHC provides the following uses and facilities as required by the DA:

- Child Care – An expanded child care program to meet the additional child care needs generated by the Phase II Project workforce as determined in accordance with the DA.
- Replacement Housing – Replacement of the existing ten-unit rental housing building as part of the Phase II Project in accordance with the DA.

Objective 3: Phase II Master Plan and Development Program – Develop a comprehensive Master Plan for Phase II of the PSJHC Campus (Phase II Master Plan) and a Development Program that are designed to achieve the following objectives:

- Uses and Facilities – Achieves Project Objectives 1 and 2 with respect to health care and related uses and facilities.
- Vested Uses and Vested Floor Area – Accommodates PSJHC Uses and Floor Area with vesting schedules to be negotiated in the Third Amendment to or Restatement of the DA.
- Campus Integration – Integrates the buildings, uses, location of uses, open space, infrastructure and circulation for Phases I and II, both north and south of Santa Monica Boulevard.
- Location of Uses – Ensures that acute care, outpatient treatment and related services are situated in close proximity to each other in order to maximize efficiency, provide convenient patient access to needed and assistive services, and control costs.
- Open Space – Preserves and expands open space on PSJHC Campus in accordance with the DA requirement of 35% open space on the South Campus and links the open space areas with pedestrian pathways.
- Uninterrupted Health Care Services – Ensures that PSJHC remains in continuous operation as a hospital and health care facility during development of the Phase II facilities.
- Phasing Objectives – Includes a schedule for Phase II development that will allow PSJHC to construct its Phase II Project buildings and related circulation, infrastructure and open space improvements in stages to: (i) ensure PSJHC health care and related services continue without interruption; (ii) ensure that PSJHC circulation, infrastructure and open space improvements are coordinated with the construction of Phase II Project buildings; (iii) ensure that PSJHC provides sufficient parking to meet its peak parking demand at all stages of Phase II development; and (iv) allow PSJHC sufficient time to raise the necessary funds to proceed with Phase II.

Objective 4: Mobility and Circulation – The Project has the following Mobility and Circulation objectives:

- Develop and implement a comprehensive circulation plan for vehicles, bicycles and pedestrians that integrates PSJHC Campus circulation with circulation in the surrounding area.
- Provide effective and convenient connections for all transportation users (vehicles, bicycles, and pedestrians) between the uses and buildings constructed under Phase I and proposed under the Phase II Project.
- Ameliorate impacts on surrounding streets by adding new driveways and/or streets on the South Campus to provide access to underground parking.

- Create a vibrant pedestrian environment and protect residents on 21st Street from cut-through vehicular traffic by converting a portion of 21st Street to a "living street" that is dedicated to pedestrians while maintaining emergency vehicle access.
- Ameliorate impacts on all modes of transportation around and to/from the Campus, including the bicycle lanes on Broadway.
- Create a bicycle-friendly Campus by providing convenient access to/from the Campus, including connections to the existing bicycle lanes in the surrounding area, and dispersing bicycle parking throughout the Campus.

Objective 5: Parking – The Project has the following Parking objectives:

- Ensure that PSJHC continues to provide sufficient vehicular parking to meet PSJHC peak parking demand at all times.
- Ensure that PSJHC parking supply is based upon periodic reassessments of PSJHC peak parking demand and is "right-sized" based upon such reassessments.
- Provide ample on-site bicycle parking and storage for employees, patients and visitors.

Objective 6: Minimize Vehicle Miles Traveled – Minimize vehicle miles traveled by implementing a comprehensive Transportation Demand Management (TDM) program for both Phase I and the Phase II Project that includes incentives for alternative transportation (public transportation, bicycling and walking), ride sharing, flexible work hours and possibilities for remote work that reduce peak hour trips, and health care and supporting uses placed in close proximity to each other so as to reduce vehicle trips between various health care providers.

Objective 7: Minimize Phase II Impacts – Ensure that the Phase II Phasing Plan and schedule minimize impacts on PSJHC neighbors and PSJHC existing uses and facilities to the extent reasonably feasible.

2.6 Description of the Phase II Project

2.6.1 Phase II Master Plan and Proposed Improvements

The Phase II Project being studied in this Draft EIR includes the Phase II Master Plan, the Phase II Development Program consisting of ten (10) Phase II Project buildings with related infrastructure improvements and open space on the North and South Campuses, amendments to the HASP, DA amendments that include modifications to Mullin Plaza and on-site circulation, a vesting tentative subdivision map, a street vacation, a Child Care Implementation Plan for Phase II, and an amended Santa Monica Community Access Plan for Phase II.

2.6.1.1 The Phase II Master Plan

The Phase II Master Plan is a comprehensive plan that will guide the implementation of Phase II Project improvements, integrate the North and South Campuses, improve infrastructure and circulation in and around the PSJHC Campus, create a new network of open space areas and enhancements to the pedestrian realm, and provide a comprehensive parking plan to meet PSJHC peak parking demand.

The Phase II Master Plan establishes the basic parameters guiding development of the Phase II Project including, without limitation: (a) building placement, (b) heights, uses, and floor areas for all buildings, (c) minimum setbacks for all buildings, (d) minimum stepbacks for all buildings, (e) parking (both subterranean and above-grade), (f) location of uses, (g) vehicular and pedestrian circulation, (h) open space and (i) a Phase II Phasing Plan that includes phasing and timing for filing DRP applications, obtaining building permits for Phase II Project buildings, constructing Phase II Project buildings, and implementing Phase II improvements such as public open space, infrastructure improvements, and community and Project benefits. The following describes the Phase II Master Plan's core Planning Principles.

Enhanced Open Spaces and Connectivity

An important Phase II Project design goal is to create well-defined, welcoming open space areas that enhance the pedestrian experience and encourage PSJHC's users, visitors, and nearby residents and employees to occupy and enjoy the outdoor areas. Saint John's Square, on the South Campus, and the redesigned Mullin Plaza, on the North Campus, would become the central activity core of the overall PSJHC Campus. Several quieter garden areas for more passive recreation opportunities are also included on the South Campus to create opportunities for a variety of outdoor experiences.

The combination of the new open space areas on the South Campus and the vehicular circulation and parking access on the periphery allow the PSJHC Campus to be a primarily pedestrian zone. New sidewalks and pedestrian paths would provide an inviting pedestrian realm that conveniently links buildings, plazas, and open space areas. An extensive Wellness Walk would weave through both Phase II and the existing Phase I sites to create a pedestrian-friendly, integrated PSJHC Campus and promote exercise, health, and wellness among visitors, patients, and staff.

The Phase II Master Plan also uses the pedestrian enhancements to connect the PSJHC Campus to the surrounding neighborhood. The South Campus includes new sidewalks that connect through the PSJHC Campus from Broadway to Santa Monica Boulevard. The Phase II buildings are intentionally designed with porous and visually open ground levels and activated ground floor uses to facilitate pedestrian movement and activity throughout the PSJHC Campus. The existing multi-family residential building and senior housing building located on the east side of 21st Street between Broadway and Santa Monica Boulevard (which are not owned by PSJHC) would have safe and inviting pedestrian connections to and through the South Campus.

There would also be several smaller open space areas on the South Campus that would be landscaped green spaces with quieter open space areas for more passive recreation opportunities to reflect the more residential context, including the existing Geneva Plaza building and the existing residential buildings to the east, as well as the new Visitor Housing (S5) building and Multifamily Housing (S2). Open space would also be added on the North Campus on Site 2I to provide an opportunity for respite and relaxation on this site, which is generally surrounded by medical office buildings and parking structures.

Additional open space for PSJHC's users would also be provided as part of the Child and Family Development Center (S1) development and on roof decks of select Phase II buildings.

Functional Zoning

As part of its Phase II planning, the PSJHC team considered where Phase II uses should be located based upon the relative need for proximity to PSJHC's core (Phase I) hospital facilities.

The Phase II Master Plan would locate new facilities for inpatient and ambulatory care towards Santa Monica Boulevard (North and South) in close proximity to PSJHC's core hospital facilities. The new Education and Conference Center, health and wellness uses, and additional medical research uses would be located in the middle of the South Campus. Uses that can be accommodated in buildings with a more residential character (e.g., the new Child & Family Development Center and Child Care Center, Visitor Housing, and Replacement Housing) would be located in the southern portion of the South Campus near Broadway.

Mobility

Accommodating vehicular, bicycle and pedestrian circulation and parking access on PSJHC's property and avoiding impacts to, and queuing on, the City streets adjacent to the PSJHC campus are priorities in PSJHC's Phase II planning.

Substantial land area on the South Campus would be devoted to vehicular and bicycle circulation in order to avoid impacts on Broadway, Santa Monica Boulevard and 21st Street. Per the City's request, priority for vehicular access to/from PSJHC is Santa Monica Boulevard while Broadway is prioritized for bicycle access. All vehicle access to/from the subterranean garages on the South Campus would be from new driveways on the South Campus, not directly from Santa Monica Boulevard or Broadway. 21st Street would be modified to eliminate its current role as the main cut-through vehicular route between Santa Monica Boulevard and Broadway. Instead, 21st Street would primarily serve the existing multi-family residential building and senior housing building on its east side, as well as provide access for visitors to PSJHC's new Child and Family Development Center. Vehicle access from the South Campus to Schader Drive would be closed to eliminate the opportunity for cut-through traffic on Schader Drive.

Changes to North Campus circulation are proposed to avoid queuing on City streets and facilitate ease of access to/from Santa Monica Boulevard. Specifically, the two existing traffic signals on Santa Monica Boulevard between 20th Street and 23rd Street would be shifted to align with the new South Campus driveways and the North Campus circulation would be modified to align with these new intersections. As a result, portions of Site 2D/E would be reserved for an expanded Mullin Plaza open space rather than being developed with additional floor area. In addition, curb cuts on 20th Street and 23rd Street would be minimized to the extent possible. Although originally envisioned as having two curb-cuts to support a larger parking supply, the development on Site 2I would be reduced and now only requires one curb cut. To limit vehicle use of 23rd Street north of Santa Monica Boulevard, the 23rd Street curb cut from Site 2D/E would be restricted to egress only and right-turn only.

Both vehicle and bicycle parking would be dispersed throughout the Campus to allow for convenient access to/from the various uses located on the PSJHC Campus.

Phase II Phasing Plan

The Phase II Master Plan includes a Phase II Phasing Plan that provides a construction sequence and strategic implementation of the entire Phase II Project development program over an extended period. The Phase II Phasing Plan also includes specific time periods within which PSJHC is required to file DRPs for each Phase II Project improvement. The Phase II Phasing Plan provides two scenarios, Phasing Plan A and Phasing Plan B. Pursuant to the Phase II Master Plan, PSJHC will select either Phasing Plan A or Phasing Plan B prior to beginning the first stage of construction for the Phase II Project.

Parking

The Phase II Master Plan creates a comprehensive parking program for the entire PSJHC Campus that would provide sufficient parking to meet peak parking demand for all Phase I and Phase II Project uses at all times during implementation. The Phase II Master Plan calls for the construction of new subterranean parking beneath most Phase II sites. The specific number of spaces to be provided at each parking location will be determined based on a parking demand study that would be updated from time to time and subject to City approval. The anticipated user groups for each parking location are summarized in the below table:

Parking Location	Anticipated User Groups
S1/S3	S1 Child & Family Development Center and S3 West Ambulatory Care & Research Building staff and visitors/patients
	Phase I visitors/patients (valet overflow)
	2C West Ambulatory & Acute Care Building staff
	2D/E East Ambulatory & Acute Care Building staff
S2	S2 Multifamily Housing residents, visitors/guests (residential and commercial), employees
2I	2I 20th Street Medical Building staff and visitors/patients
	Phase I staff
S4/S5	S4 Education & Conference Center and East Ambulatory Care & Research Building and S5 Visitor Housing staff and visitors/patients
	Phase I (North Campus) visitors/patients
	2C West Ambulatory & Acute Care Building staff
	2D/E East Ambulatory & Acute Care Building staff
	S2 Multifamily Housing residents, visitors/guests (residential and commercial), employees (if S2 subterranean garage is not constructed)
2C	2C West Ambulatory & Acute Care Building visitors/patients
	Phase I visitors/patients (valet overflow)
2D/E	2D/E East Ambulatory & Acute Care Building visitors/patients
	Phase I visitors/patients
	Phase I physicians
Mullin Plaza	Phase I visitors/patients

2.6.1.2 The Phase II Development Program

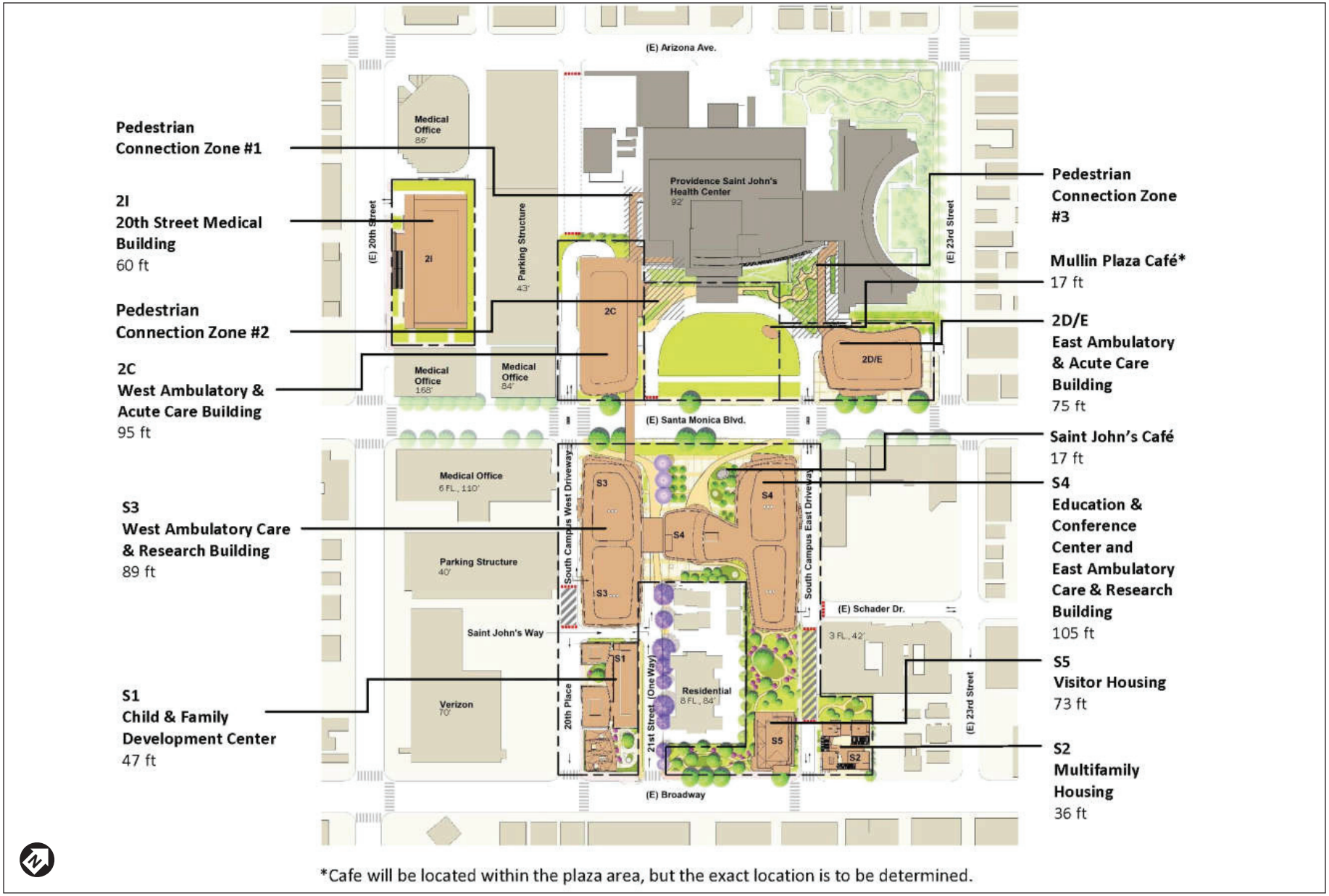
The Phase II Master Plan allows for the construction of ten (10) Phase II Project buildings and associated infrastructure and open space improvements (Phase II Development Program), which are described individually in detail below. The Phase II Development Program establishes the building location, height, floor area, uses, minimum stepbacks, and minimum setbacks for each of the ten buildings.[2]

The Phase II Development Sites for each of the ten (10) buildings and associated infrastructure and open space improvements in the Phase II Development Program are shown below in **Figure 2-3**, *Phase II Site Plan*, while proposed setback distances are depicted in **Figure 2-4**, *Proposed Setbacks*. Unless otherwise provided, the descriptions in this section describe the improvements according to Phasing Plan A (described further below under Section G.1, Phase II Phasing Plan). For some buildings, the sum of the maximum floor areas for the Uses that may occur within the proposed building exceeds that overall building's floor area in order to allow some flexibility for establishing the eventual location and not-to-exceed amount of certain Uses within the Phase II buildings. In addition, for some Uses, the sum of the Use allowed in all Phase II Project buildings exceeds the overall square footage for the Use. This allows some flexibility as to what portion of that Use will be located in the various Phase II Project buildings. However, in no event will any Phase II building exceed the maximum floor area identified for the building, nor will any Phase II Use exceed the total square footage for the use as provided in the DA, as amended. The allowable development on the Project Site, the proposed development under the Phase II Project, as well as proposed building height limits, are summarized below in **Table 2-3**, *Phase II Development Summary*. It should be noted that all heights included in this Project Description, including in Table 2-3, do not include projections for roof elements, including mechanical equipment; parapets; exhaust pipes; elevator overrides; heating, ventilation, and air conditioning (HVAC); and other equipment.

Site S2: Multifamily Housing

The development program for Site S2 includes removal of the southeast corner of Lot H (parking capacity in Lot H would be reduced by 89 vehicles) and replacing it with a multifamily residential building and on-site open space located north of the Multifamily Housing. As part of development on Site S2, Southeast Driveway would be created. This building would include ten (10) two-bedroom residential units and up to 800 square feet of Neighborhood Commercial Uses along the south façade, and would have a maximum height of 36 feet. Of the 10 residential units, two units would be for low-income households (defined as 80 percent of the median income). (DA Section 3.1.4.1(b).) There may be up to two-levels of subterranean parking beneath the Multifamily Housing. As shown on Figure 2-4, the Multifamily Housing (S2) would be set back a minimum of three feet from the property line along Broadway to allow a minimum distance of 15 feet from the curb. The Multifamily Housing (S2) would also be set back a minimum of 20 feet from the property line of the existing multifamily residential building located at 1440 23rd Street to provide a buffer between the two buildings. It is envisioned that this open space would be landscaped to provide areas for passive recreation including for picnicking, seating/reading, and dog walking.

[2] Setbacks for all buildings on the North Campus are per the DA's Exhibit D, p. D-5.



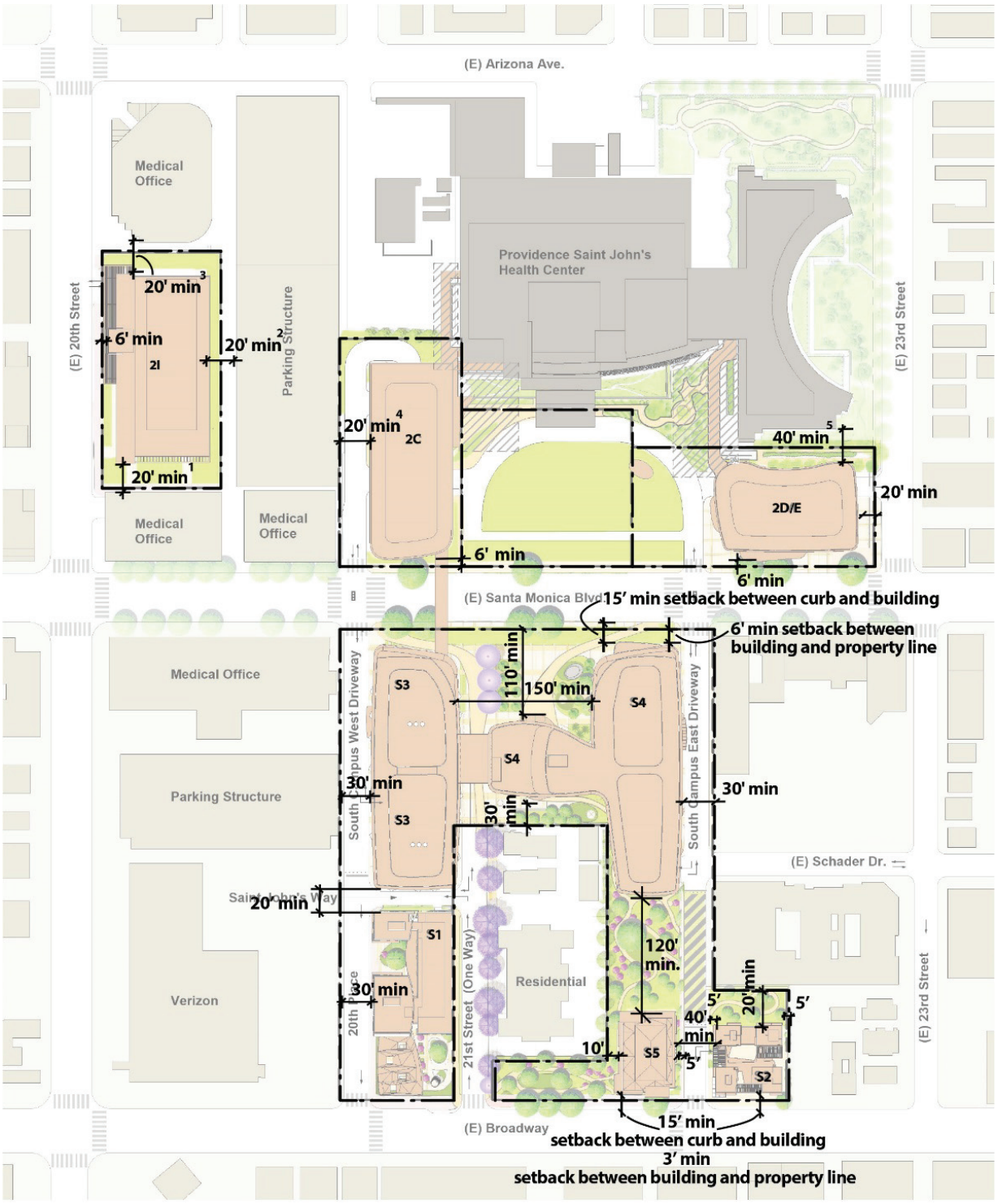
*Cafe will be located within the plaza area, but the exact location is to be determined.

SOURCE: Perkins Eastman, 2019

Providence Saint John's Health Center Phase II Project

Figure 2-3
Phase II Site Plan

ESA



1. 20′ min setback from the north side of the building located at 2001 Santa Monica Boulevard
2. 20′ min setback from the west side of the Parking Structure for 2001 and 2021 Santa Monica Boulevard
3. 20′ min setback from the south side of the building located at 1301 20th Street
4. 20′ min setback from the east side of the Parking Structure for 2001 and 2021 Santa Monica Boulevard
5. 40′ min setback from the east side of the south façade of the existing CSS building

D170258.00

SOURCE: Perkins Eastman, 2018

Providence Saint John's Health Center Phase II Project

Figure 2-4
Proposed Setbacks

ESA

TABLE 2-3
PHASE II DEVELOPMENT SUMMARY

Building Name		Types of DA Uses in Building	Floor Area/ Units per Use*	Max. Building Floor Area**	Max. Height
S1	Child & Family Development Center	Child & Family Development Center	25,500 sf	**34,500 sf**	47 feet
		Day Care	25,000 sf		
		Up to five levels of subterranean parking			
S2	Multifamily Housing	Multifamily Housing	10 units	10 units plus **800 sf** commercial	36 feet
		Restaurant or Neighborhood Commercial Uses	800 sf		
		Up to two levels of subterranean parking			
S3	West Ambulatory Care & Research Building	Hospital/Health Care	65,000 sf	**123,000 sf**	89 feet
		Medical Research Facilities	123,000 sf		
		Health & Wellness Center	90,000 sf		
		Restaurant or Neighborhood Commercial Uses or Health Related Services	5,000 sf		
		Up to five levels of subterranean parking			
S4	Education & Conference Center and East Ambulatory Care & Research Building	Education & Conference Center	60,000 sf	**199,000 sf**	105 feet
		Hospital/Health Care	120,000 sf		
		Health & Wellness Center	90,000 sf		
		Medical Research Facilities	120,000 sf		
		Health-Related Services Restaurant or Neighborhood Commercial Uses	10,000 sf		
		Up to five levels of subterranean parking			
S5	Visitor Housing	Visitor Housing	30-34 units	**38,000 sf**	73 feet
		Up to five levels of subterranean parking			
	Saint John's Café	Restaurant or Neighborhood Commercial Uses	900 sf	**900 sf**	17 feet
2C	West Ambulatory & Acute Care Building	Hospital/Health Care	117,500 sf	**123,350 sf** above-grade (including 9,350 sf of Pedestrian Connections) **6,150 sf** below-grade (including 2,650 sf of Pedestrian Connections)	95 feet
		Medical Research Facilities	117,500 sf		
		Health & Wellness Center	90,000 sf		
		Health-Related Services Restaurant or Neighborhood Commercial Uses	5,500 sf		
		Pedestrian Connections	12,000 sf (9,350 sf above-grade, 2,650 below-grade)		
		Up to four levels of subterranean parking			
2D/E	East Ambulatory & Acute Care Building	Hospital/Health Care	78,500 sf	**65,800 sf** above-grade (including 3,300 sf of Pedestrian Connections) **16,400 sf** below-grade (including 400 sf of Pedestrian Connections)	75 feet
		Medical Research Facilities	78,500 sf		
		Health & Wellness Center	78,500 sf		
		Health-Related Services Restaurant or Neighborhood Commercial Uses	3,000 sf		
		Pedestrian Connections	3,700 sf (3,300 sf above-grade, 400 sf below-grade)		

	Building Name	Types of DA Uses in Building	Floor Area/ Units per Use*	Max. Building Floor Area**	Max. Height
		Up to four levels of subterranean parking			
2I	20th Street Medical Building	Medical Office	50,000 sf	**73,300 sf**	60 feet
		Medical Research Facilities	50,000 sf		
		Health & Wellness Center	50,000 sf		
		Hospital/Health Care	50,000 sf		
		Child & Family Development Center	50,000 sf		
		Health-Related Services Restaurant or Neighborhood Commercial Uses	4,500 sf		
		Above- Grade Parking (Vehicle and Bicycle) and Vehicle Circulation	18,800 sf		
		Up to four levels of subterranean parking			
	Mullin Plaza Café	Restaurant or Neighborhood Commercial Uses	1,500 sf	**1,500 sf**	17 feet

*The sum of the permitted floor area/units per use are subject to the overall maximum floor areas/units per Use in accordance with the DA as it is proposed to be amended (discussed in Section 2.6.2).

**For some buildings, the sum of the maximum floor areas for the Uses that may occur within the building exceeds that overall building's floor area in order to allow some flexibility for establishing the eventual location and the not-to-exceed amount of certain Uses within the Phase II buildings.

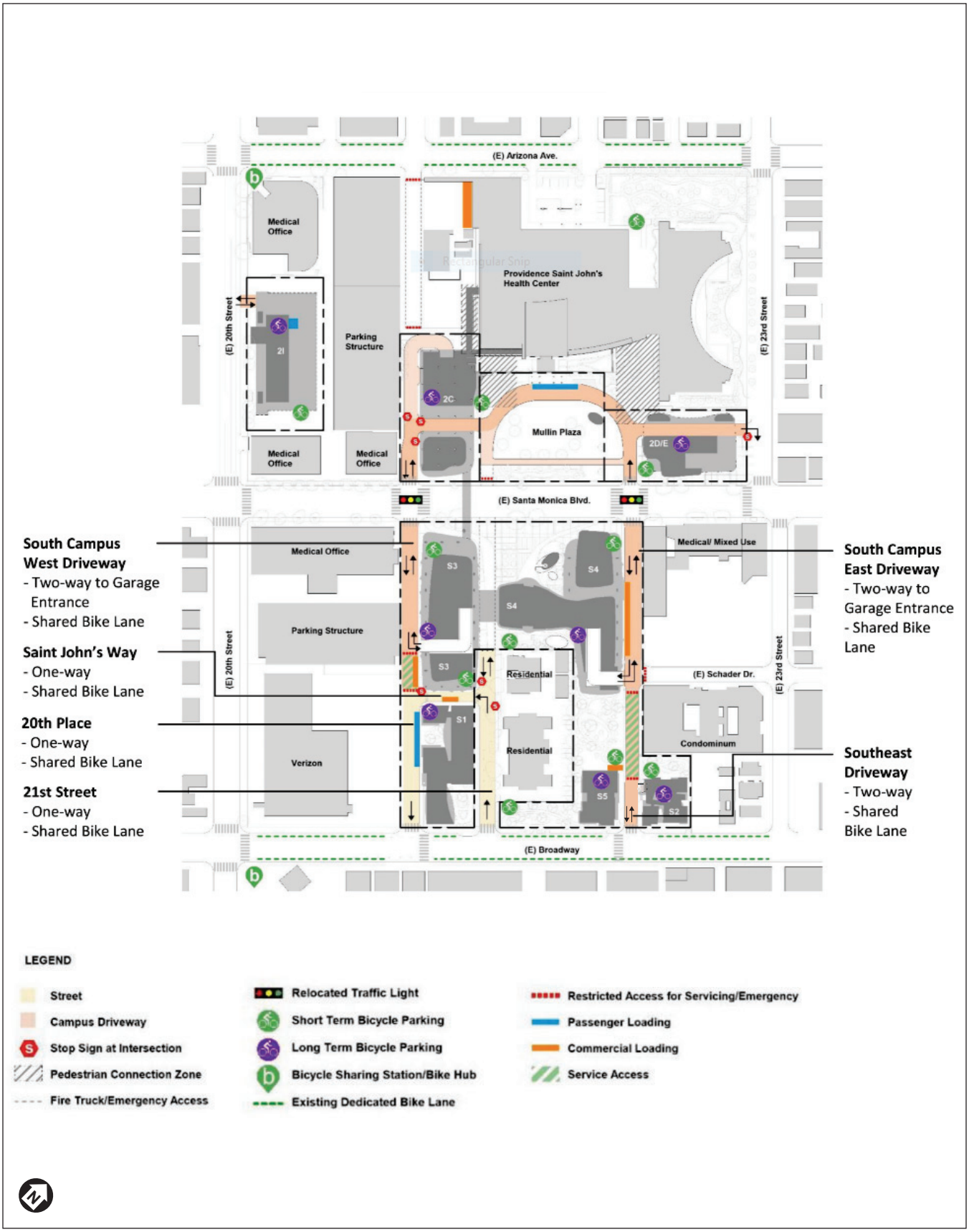
SOURCE: PSJHC, 2019.

Sites S1 and S3: Child & Family Development Center and West Ambulatory Care & Research Building

The development program for Sites S1 and S3 includes demolishing the existing two (2) temporary MRI modular buildings and existing surface parking Lots B and I and replacing them with the Child & Family Development Center (S1), the West Ambulatory Care & Research Building (S3), subterranean parking, and open space. As part of the S1 and S3 construction, new streets 20th Place and Saint John's Way would be created. A new driveway from Santa Monica Boulevard, South Campus West Driveway, would also be created. In addition, the northern portion of 21st Street would be vacated, as shown in **Figure 2-5**, *Proposed Vehicular and Bicycle Circulation*.

The Child & Family Development Center (S1)

The Child & Family Development Center (S1) building would include Child & Family Development Center use and Daycare use as shown in Table 2-3. Per DA Section 1.8.2(b)(iii), enrollment priority for the Daycare use in Phase II would be: (1) children of PSJHC employees, (2) children of Santa Monica residents and (3) children of those working in Santa Monica. The Child & Family Development Center (S1) would include ground level open space, some of which would be secured for the Daycare use. The maximum floor area of the building would be 34,500 square feet with a maximum height of 47 feet. The Child & Family Development Center (S1) would be set back a minimum of three feet from the property line along Broadway to allow a minimum of 15 feet from the curb as shown on Figure 2-4.



SOURCE: Perkins Eastman, 2018

Providence Saint John's Health Center Phase II Project

Figure 2-5
Proposed Vehicular and Bicycle Circulation

ESA

West Ambulatory Care & Research Building (S3)

The West Ambulatory Care & Research Building (S3) includes Hospital/Health Care uses, Medical Research Facilities, and/or Health & Wellness Center uses and ground-level Restaurant, Neighborhood Commercial Uses, or Health Related Services as shown in Table 2-3. The maximum floor area of the building would be 123,000 square feet with a maximum height of 89 feet.

As shown on Figure 2-4, the West Ambulatory Care & Research Building (S3) would be set back a minimum of 6 feet from the property line along Santa Monica Boulevard to allow a minimum of 15 feet from the curb.

An above-grade pedestrian connection would be located between the West Ambulatory Care & Research Building (S3) and the Education & Conference Center and East Ambulatory Care & Research Building (S4). This connection would be developed as part of the S4 development and is described below.

An up to 2,100-square-foot above-grade enclosed Pedestrian Connection over Santa Monica Boulevard connecting the West Ambulatory Care & Research Building (S3) and the West Ambulatory & Acute Care Building (2C) is also proposed. This element (along with the tunnel connection underneath Santa Monica Boulevard described below) would either be constructed as part of the S3 development or as part of the 2C development, depending on which development proceeds first (see discussion of Alternative Phasing Plans in Section G.1 below). The permitted floor area for this Pedestrian Connection is included in the permitted above-grade floor area for the West Ambulatory & Acute Care Building (2C). Structural columns to support this Pedestrian Connection would be located on both Sites 2C and S3.

Subterranean Parking Garage

As part of development on Sites S1 and S3, a subterranean parking garage with up to five levels of underground parking would be provided beneath the S1 and S3 sites. Once the subterranean parking garage on Sites S4 and S5 is built, it would connect with the subterranean parking garage beneath Sites S1 and S3 and function as one parking garage. A subterranean tunnel connection beneath Santa Monica Boulevard connecting the S1/S3 parking garage and the 2C parking garage is also proposed. This connection would allow vehicular circulation between the two garages without having to utilize Santa Monica Boulevard. As with the above-grade Pedestrian Connection over Santa Monica Boulevard, this element would either be constructed as part of the S3 development or as part of the 2C development, depending on which development proceeds first (see discussion of Alternative Phasing Plans in Section G.1 below).

Site 2I: 20th Street Medical Building

The development program for Site 2I includes demolishing the existing Child & Family Development Center and construction of the 20th Street Medical Building (2I).

As shown in Table 2-3, the 20th Street Medical Building (2I) would contain (1) ground floor Health-Related Services, Restaurant, or Neighborhood Commercial uses, bike parking and maintenance area, a lobby, and limited vehicle parking (located behind the ground floor commercial space) and (2) two floors that may be used for Medical Office uses, Hospital/Health Care uses, Medical

Research Facilities, Health & Wellness Center uses and/or Child and Family Development Center uses. The maximum floor area of the building would be 73,300 square feet. The maximum height of the building would be 60 feet and there would be up to four levels of subterranean parking. Site 2I would also be improved with ground level open space as part of construction of the 20th Street Medical Building.

As shown on Figure 2-4, the 20th Street Medical Building (2I) would be set back from 20th Street a minimum of six feet from the property line and a minimum of 20 feet from the adjacent medical/parking garage buildings (2001 Santa Monica Boulevard to the south, 2001/2021 Santa Monica Boulevard parking garage to the east, and 1301 Arizona Avenue to the north).

Site 2C: West Ambulatory & Acute Care Building

The development program for Site 2C includes removal of the existing West Lot and landscaping and construction of the West Ambulatory & Acute Care Building with subterranean parking. The 2C development also includes enclosed Pedestrian Connections between the West Ambulatory & Acute Care Building (2C) and the existing Phase I Keck Building that would be constructed on and across Phase I land area and would require the removal of two existing one-story cinder block buildings commonly referred to as the "technology docks."

The West Ambulatory & Acute Care Building (2C) would contain Hospital/Health Care uses, Medical Research Facilities, and/or Health & Wellness Center uses; ground-level Health-Related Services, Restaurant or Neighborhood Commercial Uses; and Pedestrian Connections as summarized in Table 2-3. The maximum floor area of the building would be 123,350 square feet above-grade and 6,150 square feet below-grade. The maximum building height would be 95 feet. There would be up to four levels of subterranean parking beneath the West Ambulatory & Acute Care Building (2C). A portion of the driveway into the subterranean parking would extend onto Phase I land as shown below in Figure 2-7.

As shown on Figure 2-4, the West Ambulatory & Acute Care Building (2C) would be set back from Santa Monica Boulevard a minimum of six feet from the property line and a minimum of 20 feet from the adjacent medical/parking garage buildings (2021 Santa Monica Boulevard and its parking garage to the west).

The West Ambulatory & Acute Care Building (2C) floor area includes up to 9,900 square feet of floor area for above-grade and below-grade Pedestrian Connections to the existing Phase I Keck Building. These include: (1) up to 7,250 total square feet of floor area allocated between two above-grade Pedestrian Connections in Pedestrian Zones #1 and #2 (with the total floor area in either Zone #1 or #2 not to exceed 5,850 square feet) and (2) up to 2,650 square feet of floor area for below-grade Pedestrian Connections. Figure 2-3 shows the locations of the above-grade Pedestrian Connections. The above-grade Pedestrian Connections in Pedestrian Zones #1 and #2 would each have a maximum width of 16 feet and a maximum height of 60 feet (excluding parapet).

The West Ambulatory & Acute Care Building floor area also includes an up to 2,100 square feet above-grade enclosed Pedestrian Connection over Santa Monica Boulevard connecting the West Ambulatory & Acute Care Building (2C) to the West Ambulatory Care & Research Building (S3).

Structural columns to support this Pedestrian Connection would be located on both Sites 2C and S3. A subterranean tunnel connection underneath the subterranean parking garages beneath both buildings would allow for vehicular circulation between the two garages without having to utilize Santa Monica Boulevard. These elements would either be constructed as part of the 2C development or as part of the S3 development, depending on which development proceeds first (see discussion of Alternative Phasing Plans in Section G.1 below).

Site S4: Education & Conference Center and East Ambulatory Care & Research Building and Saint John's Café

The development program for Site S4 includes the removal of the existing surface parking (Lot H) to allow for the construction of two buildings, the Education & Conference Center and East Ambulatory Care & Research Building and Saint John's Café. The development program also includes the creation of the new South Campus East Driveway and the creation of the new open space area called Saint John's Square.

The existing buildings located on Site S4, the 10-unit multifamily housing building and the John Wayne Cancer Institute building, would be demolished after their new facilities are constructed (the Multifamily Housing (S2) and the West Ambulatory Care & Research Building (S3). After demolition, this land area would be used for construction staging and interim parking until construction for the Site S4 development program begins.

Education & Conference Center and East Ambulatory Care & Research Building

The Education & Conference Center and East Ambulatory Care & Research Building (S4) includes Hospital/Health Care uses, Education & Conference Center uses, Health and Wellness Center uses, Medical Research Facilities and ground floor Health-Related Services, Restaurant or Neighborhood Commercial Uses as shown in Table 2-3. The maximum floor area of the building would be 199,000 square feet and the maximum height of the building would be 105 feet.

The Education & Conference Center and East Ambulatory Care & Research Building (S4) is split into two sections: (i) the Education & Conference Center uses in the West Section and (ii) Hospital/Health Care and Health and Wellness Center uses in the East Section. The Education & Conference Center and East Ambulatory Care & Research Building (S4) floor area includes an above-grade, two-level pedestrian connection between the West Ambulatory Care & Research Building (S3) and the Education & Conference Center and East Ambulatory Care & Research Building (S4).

As shown on Figure 2-4, the Education & Conference Center and East Ambulatory Care & Research Building (S4) would be set back a minimum of six feet from the property line along Santa Monica Boulevard, in order to allow a minimum of 15 feet from the curb, and a minimum of 30 feet from the northern property line of the existing multifamily residential units located at 1427 and 1433 21st Street. Within this 30-foot setback, a landscaped buffer area is proposed (tentatively called the Woodland Garden).

Saint John's Square and Café

As part of development on Site S4, a new open space area, Saint John's Square, would be created along Santa Monica Boulevard between the S3 and S4 buildings. This open space would have a minimum dimension of 110 feet (north/south) by 150 feet (east/west). Given the proximity of this open space to Santa Monica Boulevard, it is envisioned that this open space would encourage active uses including areas complementing the ground floor commercial uses located in S3, S4 and Saint John's Café such as outdoor dining and outdoor classes and provide sufficient space for special events such as health fairs.

Saint John's Square would include space for a commercial kiosk, Saint John's Café, that would include up to 900 square feet of Restaurant or Neighborhood Commercial Uses. The maximum floor area of Saint John's Café would be 900 square feet with a maximum height of 17 feet.

Subterranean Parking Garage

As part of development on Site S4, a subterranean parking garage with up to five levels of underground parking would be provided beneath both the S4 and S5 sites as well under the vacated/northern portion of 21st Street. This subterranean parking garage would be connected to the subterranean parking garage beneath Sites S1 and S3 and subterranean parking beneath S1, S3, S4 and S5 would function as one parking garage. Construction of the subterranean parking garage would require the removal of the remaining portion of the existing surface parking Lot H (parking capacity of 215 vehicles). A subterranean tunnel connection beneath Santa Monica Boulevard connecting the S4 parking garage and the 2D/E parking garage is also proposed. This connection would allow vehicular circulation between the two garages without having to utilize Santa Monica Boulevard. This element would be constructed as part of the 2D/E development.

Site S5: Visitor Housing

The development program for Site S5 includes the construction of an up to 34-unit Visitor Housing building and the creation of two new open space areas.

Visitor Housing

The Visitor Housing building would include up to 34 units (maximum of 38,000 square feet of floor area) of Visitor Housing, which is defined in the DA as "overnight visitor accommodations provided for occupancy exclusively by (i) inpatients and outpatients of other facilities located on the [PSJHC Campus] and their family members, (ii) visiting health care professionals to the [PSJHC Campus] and (iii) participants in health care conferences and seminars located on the [PSJHC Campus]." (DA Section 3.3.1(s).). The DA provides that the Visitor Housing must be operated "on an integrated and coordinated basis with other health care services," and the DA specifically prohibits PSJHC from marketing the availability of units in the Visitor Housing to the general public or making the units available to the general public. (DA Section 3.3.1(s).)

The Visitor Housing building would have a maximum height of 73 feet. As shown on Figure 2-4, the Visitor Housing (S5) building would be set back a minimum of three feet from the property line along Broadway to allow a minimum distance of 15 feet from the curb as shown in Figure 2-4. In addition, two new open space areas would be created as part of the Site S5 development: the Sun Garden and the South Garden.

Sun Garden

An open space area to the north of the Visitor Housing (S5) with minimum dimensions of 135 feet by 90 feet would be provided. The open space area would encourage pedestrian activity on the South Campus and provide a buffer between the new Phase II Project buildings and the existing multifamily residential building at 1440 23rd Street and the existing residential buildings located to the west. Given the proximity of residential uses to both the east and west of this open space area, it is envisioned that this open space area would have more passive recreation opportunities, including tables to eat outdoors and read and places for strolling and exercise stations.

South Garden

An open space area to the west of the Visitor Housing (S5) with minimum dimensions of 50 feet by 145 feet would also be created to encourage pedestrian activity on the South Campus and Broadway and create a pleasant landscaped area in front of the existing Geneva Plaza senior housing building. It is envisioned that this open space area would provide opportunities to read and eat outdoors and spaces for strolling and exercise stations.

Subterranean Parking Garage

As part of Site S4 development, a subterranean parking garage with up to five levels of underground parking would be provided beneath the S4 and S5 sites as well as the vacated/northern portion of 21st Street. This subterranean parking garage would be connected to the subterranean parking garage beneath Sites S1 and S3 and subterranean parking beneath S1, S3, S4 and S5 would function as one parking garage.

Sites 2D/E and Mullin Plaza: The East Ambulatory & Acute Care Building

The development program for Site 2D/E includes the demolition of the single-story office building located at 2221 Santa Monica Boulevard (currently used by the Saint John's Health Center Foundation), and the existing surface parking lots, followed by the construction of the East Ambulatory & Acute Care Building and associated subterranean parking. As part of the Site 2D/E development, the existing Mullin Plaza open space on the North Campus would be expanded and redesigned.

The East Ambulatory & Acute Care Building

The East Ambulatory & Acute Care Building (2D/E) would include Hospital/Health Care uses, Medical Research Facilities, and/or Health & Wellness Center uses; ground floor Health-Related Services, Restaurant or Neighborhood Commercial Uses; and Pedestrian Connections as shown in Table 2-3. The maximum floor area of the building would be 65,800 square feet above-grade and 16,400 square feet below-grade. The maximum height of the building would be 75 feet. There would be up to four levels of subterranean parking beneath the East Ambulatory & Acute Care Building (2D/E).

The East Ambulatory & Acute Care Building (2D/E) floor area includes up to 3,700 square feet of floor area for above-grade and below-grade Pedestrian-Connections to the existing Phase I CSS Building. These include: (1) up to 3,300 square feet of floor area for above-grade Pedestrian Connections in Pedestrian Zone #3 and (2) up to 400 square feet of floor area for below-grade Pedestrian Connections. Figure 2-3 shows the location of the above-grade Pedestrian Connections. The above-grade Pedestrian Connection in Pedestrian Zone #3 would have a maximum width of 16 feet and a maximum height of 24 feet (excluding parapet).

A subterranean tunnel connection underneath the subterranean parking garages beneath Site 2D/E and Site S4 would allow for vehicular circulation between the two garages without having to utilize Santa Monica Boulevard.

As shown on Figure 2-4, the East Ambulatory & Acute Care Building (2D/E) would be set back from Santa Monica Boulevard a minimum of six feet from the property line, set back from 23rd Street a minimum of 20 feet from the property line, and set back from the adjacent existing Phase I CSS Building a minimum of 40 feet.

Mullin Plaza and Café

As part of development on Site 2D/E, the existing open space area within the Mullin Plaza driveways would be expanded to approximately 23,000 square feet when the existing curb cut on Santa Monica Boulevard for the Mullin Plaza ingress driveway is shifted east to align with the new South Campus East Driveway. In addition to being expanded, the open space would be redesigned to facilitate more active use of the plaza open space by employees, patients, visitors and neighbors. The expanded Mullin Plaza open space is envisioned to provide areas for everyday use such as outdoor dining, seating/reading, and waiting for patients and families, as well as special events such as musical events.

The redesigned plaza may include a commercial kiosk, the Mullin Plaza Café, which would include Restaurant or Neighborhood Commercial Uses as shown in Table 2-3. The maximum floor area of the building would be 1,500 square feet with a maximum height of 17 feet.

2.6.2 Development Agreement Amendments

As part of the Phase II project, a Third Amendment to or restatement of the DA is proposed for concurrent consideration with the Phase II Master Plan. Notably, the amendments would allow an extension of Phase II vested rights pursuant to a comprehensive Phasing Plan that provides review of individual Phase II Project buildings at specified milestones. Other DA amendments are proposed as part of the Phase II project, including but not limited to an additional 50,000 square feet of floor area for Hospital/Health Care uses (404,000 square feet instead of 354,000 square feet) with no increase in the overall floor area for Phase II, changes to and expansion of the Mullin Plaza open space, and the potential addition of a small retail/café structure within this open space.

2.6.3 Hospital Area Specific Plan Amendments

HASP amendments are proposed to update the City's HASP with respect to the PSJHC and its Phase II Project. The proposed HASP amendments will ensure consistency with the amended DA and Phase II Master Plan.

2.6.4 Child Care Implementation Plan for Phase II

The DA requires a Child Care Implementation Plan for Phase II that would include the expanded child care program that addresses child care needs generated by Phase II. (DA Section 1.8.2(a).) The Child Care Implementation Plan would include the results of the required child care needs study, operational details of the expanded program (such as the number and ages of children, hours of operation, and staffing), employee and community outreach, proposed facilities, service priorities, and an implementation schedule. (DA Section 1.8.2(e)(iii).) As previously described, the Phase II Development Program would include a Day Care of up to 15,000 square feet with an enrollment priority for (1) children of PSJHC employees, (2) children of Santa Monica residents, and (3) children of those working in Santa Monica. The Child Care Implementation Plan for Phase II is required to be approved by the City Council prior to approval of any DRPs for Phase II. (DA Section 1.8.2(e)(v).) Therefore, the Child Care Implementation Plan would be submitted for review and approval by the City Council concurrently with the Phase II Master Plan.

2.6.5 Amended Santa Monica Community Access Plan for Phase II

As previously stated the SMCAP is a subset of the Community Benefit Plan. The DA requires an amended SMCAP for Phase II. The amended SMCAP would modify the existing Santa Monica Community Access Plan for Phase I and "ensure that a reasonable number of Santa Monica residents who are unable to afford fees and memberships will have access to Phase [II]'s community-oriented facilities, including but not limited to, the Education & Conference Center, the Health & Wellness Center and the Visitor Housing [Building]." (DA Section 1.7.2(b).) In accordance with the DA, as amended by the Second Amendment to the DA, an amended SMCAP must be approved by City Council prior to approval of the Phase II Master Plan. (DA Section 1.7.2(c) as amended by Second Amendment to DA Section 1.)

2.6.6 Subdivision Map(s)

A subdivision map (or maps) is proposed to subdivide the PSJHC Campus in conjunction with the Phase II Master Plan.

2.6.7 Street Vacation Application for the Northern Portion of 21st Street

The Phase II Project includes the vacation of the northern portion of 21st Street to allow for the implementation of the Phase II Development Program, including proposed enhanced open space areas and circulation improvements on the South Campus as described below.

2.6.8 Access, Circulation, and Parking

2.6.8.1 Access and Circulation

The Phase II Master Plan includes circulation improvements on and around the PSJHC Campus that would be implemented over time as part of the Phase II Development Program. The Phase II Master Plan includes pedestrian improvements, including widened sidewalks along Santa Monica Boulevard and Broadway, new crosswalks across Broadway and Santa Monica Boulevard, new open space areas to encourage pedestrian activity throughout the Campus, and improvements to the pedestrian network within the Campus. The Phase II Master Plan includes new bicycle connections to the dedicated bicycle lanes on Broadway. And, the Phase II Master Plan provides for vehicular access to and from the Campus primarily through private driveways accessed from Santa Monica Boulevard. Figure 2-5 shows the vehicle, bicycle, and pedestrian circulation included in the Phase II Master Plan.

New Circulation Located on the PSJHC South Campus

The Phase II Master Plan includes two new driveways on the South Campus from Santa Monica Boulevard and one new driveway from Broadway. The Phase II Master Plan also includes a short new north-south street, tentatively called 20th Place, and a new east-west street between 21st Street and 20th Place, tentatively called Saint John's Way.[3] These new driveways and streets are shown on Figure 2-5 and described below.

The new streets and driveways on the South Campus would allow for vehicular access for the South Campus to be provided on PSJHC property, rather than directly from Santa Monica Boulevard or Broadway. In addition, the Mullin Plaza driveways on Santa Monica Boulevard would be relocated/widened to align with the new South Campus East Driveway and South Campus West Driveway (described below).

South Campus West Driveway

South Campus West Driveway is a new north-south driveway that would run from Santa Monica Boulevard to the subterranean parking garage located on the west side of the South Campus. South Campus West Driveway includes the following:

- Vehicles: South Campus West Driveway would be a two-way driveway that provides vehicular access to/from Santa Monica Boulevard and the subterranean parking garage beneath the South Campus sites. Except for emergency and service/logistics vehicles, there would generally be no through access for vehicles between Broadway and Santa Monica Boulevard. A controlled access mechanism would be located on South Campus West Driveway immediately south of the entrance to the subterranean parking garage. A commercial loading area is provided in the area between the controlled access mechanism and 20th Place.
- Pedestrians: South Campus West Driveway would include a sidewalk on its east side to promote pedestrian circulation from Santa Monica Boulevard to the South Campus. The sidewalk would continue to Broadway along the new 20th Place (described below), creating better pedestrian connectivity through the South Campus (including to the new open space

[3] 20th Place would be a two-way street from Santa Monica Boulevard to the parking entrance at Site S3, and a one-way southbound street from Saint John's Way to Broadway.

areas on the South Campus) and between the Expo Light Rail Stations and overall PSJHC Campus. New signalized crosswalks would be provided on the east and west sides of the relocated intersection of Santa Monica Boulevard and South Campus West Driveway to provide a pedestrian connection between the North and South Campuses.

- Bicycles: South Campus West Driveway would be shared with bicycles and provide bicycle access to the South Campus, including to short-term and long-term bicycle parking.

South Campus West Driveway, including the relocated traffic signal at its intersection with Santa Monica Boulevard, would be created as part of development on Site S3 (described above).

20th Place

20th Place is proposed as a new southbound street that would run from Saint John's Way (described below) to Broadway and include the following:

- Vehicles: 20th Place would be a one-way southbound street from Saint John's Way to Broadway. 20th Place would serve the proposed S1 Building. Emergency and service/logistics vehicles would also be able to utilize 20th Place for north/south access between Santa Monica Boulevard and Broadway via the South Campus West Driveway.
- Pedestrians: 20th Place would include sidewalks to promote pedestrian circulation from Broadway to the South Campus. The sidewalk on the east side of 20th Place would continue to Santa Monica Boulevard (along South Campus West Driveway), creating better pedestrian connectivity through the South Campus (including to the new open space areas on the South Campus) and between the Expo Light Rail Stations and overall PSJHC Campus. A new crosswalk would be provided on the east side of the new intersection of 20th Place and Broadway to provide a pedestrian connection between the South Campus and the Expo Light Rail Station.
- Bicycles: 20th Place would be a shared street with bicycles and provide access from the South Campus and the existing residential buildings on 21st Street to the dedicated bicycle lanes on Broadway.

20th Place would be created as part of the development on Site S1 (described above), the new Child & Family Development Center.

Saint John's Way

Saint John's Way is proposed as a short east-west connecting street that would run from the revised 21st Street (described below) to the new 20th Place. This street would include:

- Vehicles: Saint John's Way would be a one-way, westbound street that provides vehicular access from 21st Street to 20th Place. Saint John's Way would primarily be used by residents of and visitors to the existing residential buildings on 21st Street and those using the passenger loading areas for the Child & Family Development Center (S1).
- Pedestrians: Saint John's Way would include sidewalks to promote pedestrian circulation through the South Campus, including to the new open space areas.
- Bicycles: Saint John's Way would be a shared street with bicycles and provide access from 21st Street to new bicycle parking on the South Campus and to the existing dedicated bicycle lanes on Broadway (via 20th Place).

Saint John's Way would be created as part of development on Site S1 (described above), the new Child & Family Development Center.

South Campus East Driveway

South Campus East Driveway is proposed as a new north-south driveway that would run from Santa Monica Boulevard to the subterranean parking garage located on the east side of the South Campus. South Campus East Driveway would include the following:

- Vehicles: South Campus East Driveway would be a two-way driveway that provides vehicular access to/from Santa Monica Boulevard and the South Campus subterranean parking garage. Except for emergency vehicles and service/logistics vehicles, there would generally be no through access for vehicles between Broadway and Santa Monica Boulevard.
- Pedestrians: South Campus East Driveway would include a sidewalk on its west side to promote pedestrian circulation from Santa Monica Boulevard to the South Campus. The sidewalk would continue to Broadway, creating better pedestrian connectivity through the South Campus (including to the new open space areas on the South Campus) and between the Expo Light Rail Stations and overall PSJHC Campus. New signalized crosswalks would be provided on the east and west sides of the relocated intersection of Santa Monica Boulevard and South Campus East Driveway to provide a pedestrian connection between the North and South Campuses.
- Bicycles: South Campus East Driveway would be shared with bicycles and provide bicycle access to the South Campus, including to short-term and long-term bicycle parking and connecting the existing dedicated bicycle lanes on Broadway (via the Southeast Driveway and the Service Access Road) to and through the South Campus.

South Campus East Driveway, including the relocated traffic signal at its intersection with Santa Monica Boulevard, would be created as part of development on Site S4 (described above).

Southeast Driveway

Southeast Driveway is proposed as a new north-south driveway that would run from Broadway to the Multifamily Housing at Site S2. Southeast Driveway would include the following:

- Vehicles: Southeast Driveway would be a two-way driveway that provides vehicular access to/from Broadway and the Multifamily Housing at Site S2. Emergency and service/logistics vehicles would also be able to utilize Southeast Driveway for through access between Santa Monica Boulevard and Broadway.
- Pedestrians: Southeast Driveway would include sidewalks to promote pedestrian circulation from Broadway to the South Campus. The sidewalks would connect to pedestrian circulation within the South Campus, creating better pedestrian connectivity through the South Campus (including to the new open space areas on the South Campus) and between the Expo Light Rail Stations and overall PSJHC Campus. A new crosswalk would be provided on the west side of the new intersection of Southeast Driveway and Broadway to provide a pedestrian connection between the South Campus and the Expo Light Rail Stations.
- Bicycles: Southeast Driveway would be shared with bicycles and provide bicycle access to the South Campus including connecting the existing dedicated bicycle lanes on Broadway to and through the South Campus.

Service Access Road

Service Access Road is proposed as a new north-south service road that would run from the southern terminus of the South Campus East Driveway to the northern terminus of the proposed Southeast Driveway.

- Vehicles: Service Access Road would be a two-way service road that provides emergency and service/logistics vehicles with through access between Santa Monica Boulevard and Broadway.
- Pedestrians: Southeast Driveway would include a sidewalk on its east side to promote pedestrian circulation from Broadway (including from the S2 building and open space on the east side of the Southeast Driveway) to/from the South Campus. The west side of the Service Access Road is open space that also provides pedestrian circulation from Broadway to/from the South Campus and between the Expo Light Rail Stations and overall PSJHC Campus.
- Bicycles: Service Access Road would be shared with bicycles and provide bicycle access to the South Campus, including connecting the existing dedicated bicycle lanes on Broadway (via the Southeast Driveway) to and through the South Campus.

Revisions to Existing Public Streets

21st Street

The Phase II Master Plan calls for the revision of 21st Street, as illustrated in Figure 2-5. The northern portion of 21st Street would be vacated and closed for normal vehicular access as part of development on Site S3 and after the new Saint John's Way and southern portion of the new 20th Place are opened for vehicular access. As part of the development on Site S4, the northern portion of 21st Street would be incorporated into the new Saint John's Square.

- ***Remaining/Southern Portion of 21st Street:***
  - Vehicles: After the new Saint John's Way and the new 20th Place are opened for vehicular access, the remaining/southern portion of 21st Street would become a northbound one-way street up to Saint John's Way and a two-way street between Saint John's Way and its northern end. The remaining/southern portion of 21st Street would primarily serve the residential buildings on the east side of 21st Street and those using the passenger loading areas for the Child & Family Development Center (S1). The remaining/southern portion of 21st Street would have approximately 19 metered parallel parking spaces distributed between both sides of the street. No changes to the existing curb cuts for the residential buildings located on the east side of 21st Street (not owned by PSJHC) are proposed.
  - Pedestrians: the remaining/southern portion of 21st Street would include sidewalks to promote pedestrian circulation between Broadway and the South Campus, creating better pedestrian connectivity through the South Campus (including to the new open space areas on the South Campus) and between the Expo Light Rail Stations and the PSJHC Campus.
  - Bicycles: The remaining/southern portion of 21st Street would provide shared bicycle access for (1) the existing residences on 21st Street to the existing dedicated bicycle lanes on Broadway (via Saint John's Way) and (2) from Broadway to new bicycle parking on the South Campus.
- ***Vacated Portion of 21st Street***: After S4 is completed, the only vehicles that would be allowed to access the northern portion of 21st Street would be emergency vehicles.

20th Street

The Phase II Master Plan includes the potential for modifications to 20th Street between Santa Monica Boulevard and Arizona Avenue. Potential options for this segment of 20th Street are illustrated below in **Figure 2-6**, *Potential 20th Street Lane Configurations*. Subject to City review and approval, the vehicle lane configurations on 20th Street between Santa Monica Boulevard and Arizona Avenue may be modified to include a center two-way left-turn lane.

Santa Monica Boulevard

The Phase II Master Plan calls for the relocation of the two existing traffic signals located at the ingress and egress to the North Campus Mullin Plaza, illustrated in Figure 2-5, as follows:

- The existing traffic signal located at the intersection of the North Campus Mullin Plaza ingress driveway and Santa Monica Boulevard would be shifted to the east to align with the new South Campus East Driveway.
- The existing traffic signal located at the intersection of the North Campus Mullin Plaza egress driveway/21st Street and Santa Monica Boulevard would be shifted to the west to align with the new South Campus West Driveway.

The Phase II Master Plan may also propose increasing the width of Santa Monica Boulevard by approximately 10 feet to add a short-term passenger loading area on the south side of Santa Monica Boulevard between the new South Campus East Driveway and 21st Street. Such a proposal would be subject to City review and approval.

Broadway

Upon Phase II Master Plan implementation, the portion of Broadway between 20th Street and 23rd Street would have approximately 52 metered parallel parking spaces distributed between both sides of the street.

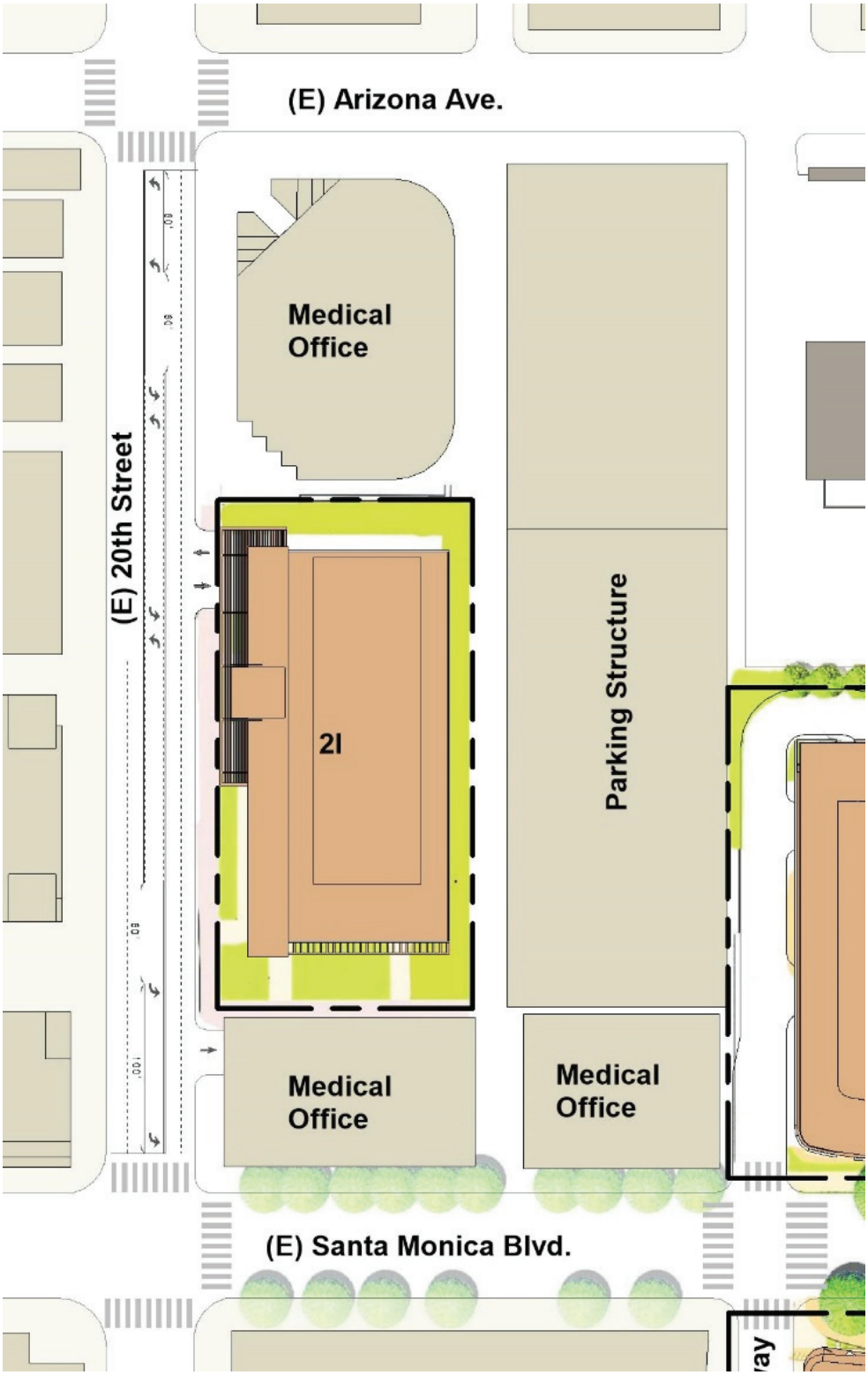
Schader Drive

The Phase II Master Plan calls for Schader Drive between 23rd Street and the PSJHC Campus to be closed at its western terminus as part of the S4 Development. This would generally prevent vehicular access from the PSJHC Campus to Schader Drive. Per the Fire Department's request, a controlled access mechanism would be added at the eastern property line between the South Campus East Driveway and Schader Drive to allow Fire Department Access.

Access Plan for Phase II Development Sites

Site S2: Multifamily Housing

Vehicular and bicycle access to/from Site S2 would be from the new Southeast Driveway. Pedestrian access to/from the Multifamily Housing would be located on the west (adjacent to the new Southeast Driveway) and south (adjacent to Broadway) sides of the building.



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SOURCE: Perkins Eastman, 2018

Providence Saint John's Health Center Phase II Project

Figure 2-6
Proposed 20th Street Lane Revision

ESA

Site S1: The Child & Family Development Center

As part of development on Site S1, the new 20th Place would be created as well as the new Saint John's Way connecting 21st Street and 20th Place. The existing 21st Street would be vacated and closed to vehicular traffic (except for emergency vehicles) north of the existing multifamily residential building located at 1427 and 1433 21st Street. This would eliminate through vehicular traffic between Broadway and Santa Monica Boulevard on 21st Street, prioritizing this street for the existing residential buildings on 21st Street and those using the passenger loading areas for the Child & Family Development Center (S1). The revised 21st Street would be a one-way northbound street between Broadway, and the new Saint John's Way and a two-way street between Saint John's Way and the northern boundary of 21st Street would facilitate access to Broadway via the new 20th Place.

Vehicular access to Site S1 for employees and visitors would be from the new South Campus West Driveway (also from the South Campus East Driveway once the S4 development is completed). Vehicular access to Site S1 for passenger and commercial loading would be from 20th Place (via 21st Street). Bicycle access to/from the Child & Family Development Center (S1) would also be from 20th Place (via 21st Street). Pedestrian access to/from the Child & Family Development Center (S1) would be located on the west (adjacent to the new 20th Place) and east (adjacent to the remaining portion of 21st Street) sides of the building.

Site S3: The West Ambulatory Care & Research Building

As part of development on Site S3, the new South Campus West Driveway would be created, thereby connecting Santa Monica Boulevard to the subterranean garage located beneath Sites S3 and S1 (vehicle access to the subterranean garage would also be available via the South Campus East Driveway once the S4 development is completed). The existing egress drive from the North Campus Mullin Plaza to Santa Monica Boulevard would be closed and the curb cut and traffic signal would be shifted to the west to align with the new South Campus West Driveway.

Vehicular access to Site S3 would be primarily from the new South Campus West Driveway (although vehicle access to the subterranean garage would also be available via the South Campus East Driveway once the S4 development is completed). Bicycle access to Site S3 would be to/from 21st Street and 20th Place. Pedestrian access to/from the West Ambulatory Care & Research Building (S3) would be provided on the west (adjacent to the new South Campus West Driveway) and the east (adjacent to the new Saint John's Square) sides of the building.

Site 2I: The 20th Street Medical Building

Vehicular access to Site 2I would be from 20th Street via a new driveway located on 20th Street. Bicycle access would also be from 20th Street. Pedestrian access to/from the 20th Street Medical Building (2I) would be provided on the west (adjacent to 20th Street) side of the building.

Site 2C: The West Ambulatory & Acute Care Building

Vehicular access to Site 2C would be provided from Santa Monica Boulevard via both (1) the Mullin Plaza ingress driveway and (2) a new curb cut on the north side of Santa Monica Boulevard aligned with the new South Campus West Driveway which would provide both ingress to and egress from the 2C site (this new curb cut would replace the existing curb cut for the Mullin Plaza

egress). Bicycle access to Site 2C would be also provided from Santa Monica Boulevard through these access points.

- Under Phasing Plan A (see phasing discussion below), a new curb cut on Santa Monica Boulevard would be created on Site 2C when the new South Campus West Driveway is created as part of the S3 development. A temporary driveway through the 2C site (resulting in the loss of 22 parking spaces in the West Lot) would be created until the Site 2C development occurs. The existing traffic signal located at the Mullin Plaza egress driveway would be removed and relocated to the new intersection created by the new South Campus West Driveway.
- Under Phasing Plan B, a new curb cut would be created on Site 2C as part of the construction of the West Ambulatory & Acute Care Building (2C). However, the existing curb cut for the Mullin Plaza egress driveway and traffic signal located at the Mullin Plaza egress driveway would remain until the new South Campus West Driveway is constructed as part of the Site S1/S3 development. At that time, the traffic signal would be moved to the intersection with the South Campus West Driveway and the existing curb cut for the Mullin Plaza egress driveway would be closed.

Pedestrian access to/from the West Ambulatory & Acute Care Building (2C) would be provided on the east (adjacent Mullin Plaza) side of the building.

Site S4: The Education & Conference Center and East Ambulatory Care & Research Building and Saint John's Café

As part of development on Site S4, the new South Campus East Driveway would be created. The existing ingress driveway from Santa Monica Boulevard to the North Campus Mullin Plaza would be closed, and the curb cut and traffic signal would be shifted to the east to align with the new South Campus East Driveway.

Vehicular access to Site S4 would be provided primarily from the new South Campus East Driveway (although vehicle access to the subterranean garage would also be available via the South Campus West Driveway). Pedestrian access to/from the Education/Conference Center portion of the building would be provided on the north (adjacent to Saint John's Square) and south sides of the building. Pedestrian access to/from the East Ambulatory Care & Research portion of the building would be located on the west (adjacent to Saint John's Square) and east (adjacent to the new South Campus East Driveway) sides of the building.

Site S5: Visitor Housing

Vehicular access to Site S5 would be provided primarily from the new South Campus East Driveway (although vehicle access to the subterranean garage would also be available via the South Campus West Driveway). Bicycle access to Site S5 would be primarily provided from the new Southeast Driveway. Pedestrian access to/from the Visitor Housing (S5) would be located on the east (adjacent to the new Southeast Driveway) and west sides of the building.

Sites 2D/E and Mullin Plaza: The East Ambulatory & Acute Care Building

Vehicular access to Site 2D/E would primarily be provided from a new curb cut on Santa Monica Boulevard that aligns with the new South Campus East Driveway (and replaces the currently existing curb cut for the Mullin Plaza ingress driveway). As with the existing conditions, this curb cut would be for ingress only. Egress from the 2D/E site would occur by either (1) exiting to Santa

Monica Boulevard via the Mullin Plaza driveway to Site 2C or (2) through a new curb cut on 23rd Street (which would replace the existing curb cut on 23rd Street). Bicycle access to Site 2C would be also provided from Santa Monica Boulevard through the Mullin Plaza ingress driveway. Pedestrian access to/from the East Ambulatory & Acute Care Building (2D/E) would be located on the west (adjacent to Mullin Plaza) and south (adjacent to Santa Monica Boulevard) sides of the building.

2.6.8.2 Parking

Phase II parking would be provided pursuant to a comprehensive, shared parking strategy that would provide sufficient supply to meet PSJHC peak parking demand for both Phase I and Phase II Project buildings. As described in the Phase II Development Program and shown below in **Figure 2-7**, *Proposed Vehicular Parking*, Phase II Project parking would be located both north and south of Santa Monica Boulevard. The Phase II Master Plan locates access to off-street parking facilities throughout the Campus to provide conveniently located parking for patients and visitors and minimize vehicles circling around the area. Figure 2-7 depicts the locations of entrances to all proposed parking locations. Both long-term and short-term bicycle parking would be provided at locations distributed throughout the North and South Campuses. Figure 2-5 illustrates the approximate locations of Phase II bicycle parking facilities.

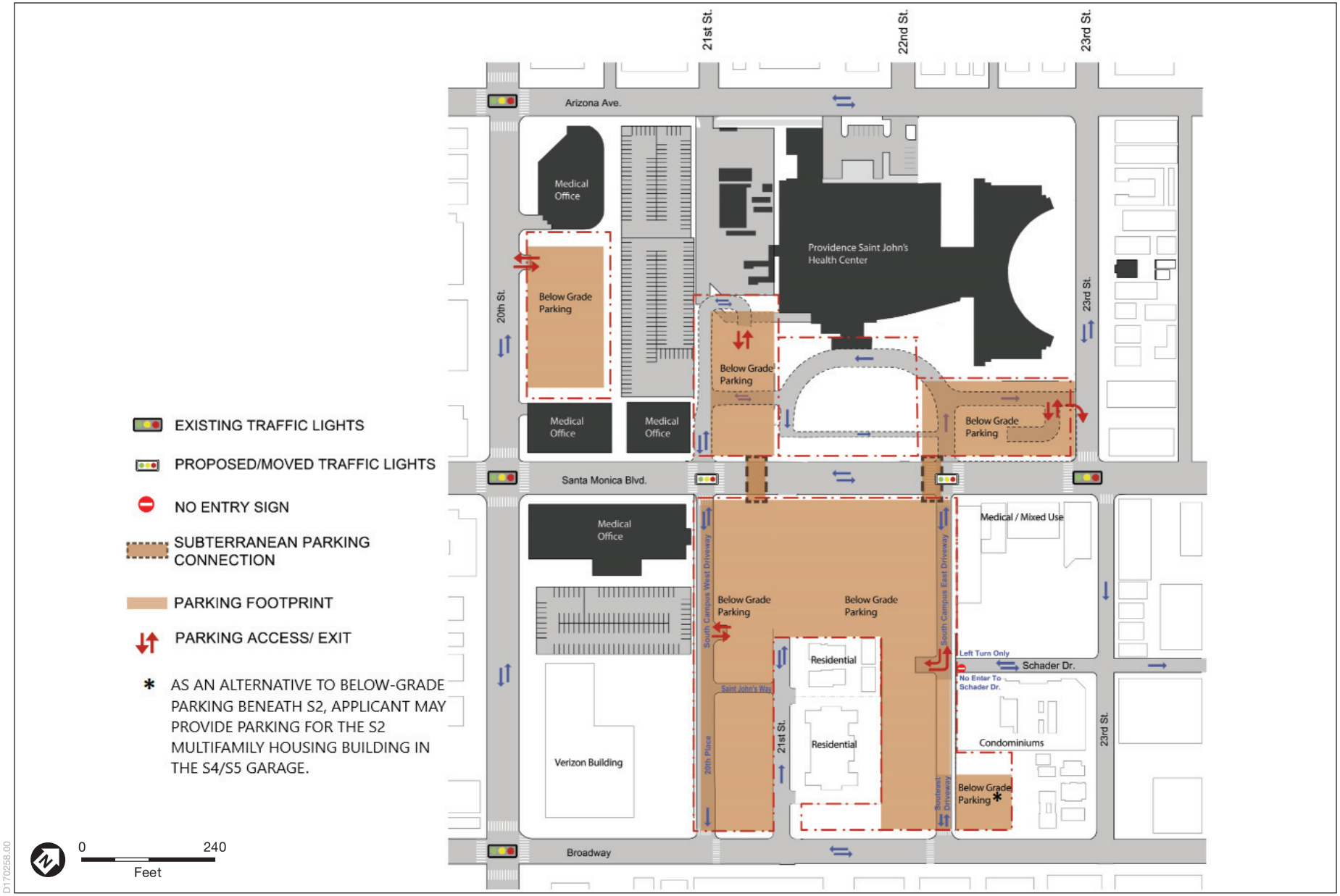
The Phase II parking requirements would be established based upon a parking demand studies that would be updated from time-to-time and would be subject to City approval to ensure (1) that sufficient parking is provided to meet peak demand and (2) that excess parking is not constructed.

2.6.9 Landscaping and Open Space

As explained above, the Phase II Master Plan includes a comprehensive plan for open space throughout the PSJHC Campus that would be implemented over time as part of the Phase II Development Program. The Phase II Master Plan proposes new open space areas on both the South Campus and North Campus, including 35% open space on the South Campus as required by the DA. These open space areas enhance the pedestrian experience on and around the Campus, allow opportunities for outdoor exercise and wellness, and provide gathering areas for PSJHC's employees, patients, and visitors as well as area residents and employees. **Figure 2-8**, *Proposed Open Space*, below, illustrates the various ground-level open space areas proposed in the Phase II Master Plan. Most of the open space areas provided on Site S3, Site S4 (including Saint John's Square), Site S5 (including the Sun Garden and South Garden), and Mullin Plaza would be publicly-accessible open space.

2.6.9.1 Site S1: Child & Family Development Center Open Space

The Child & Family Development Center (S1) would include ground-level open space, including secure open space exclusively for the Daycare use, provided pursuant to State regulations, and additional open space for the Child & Family Development Center use.

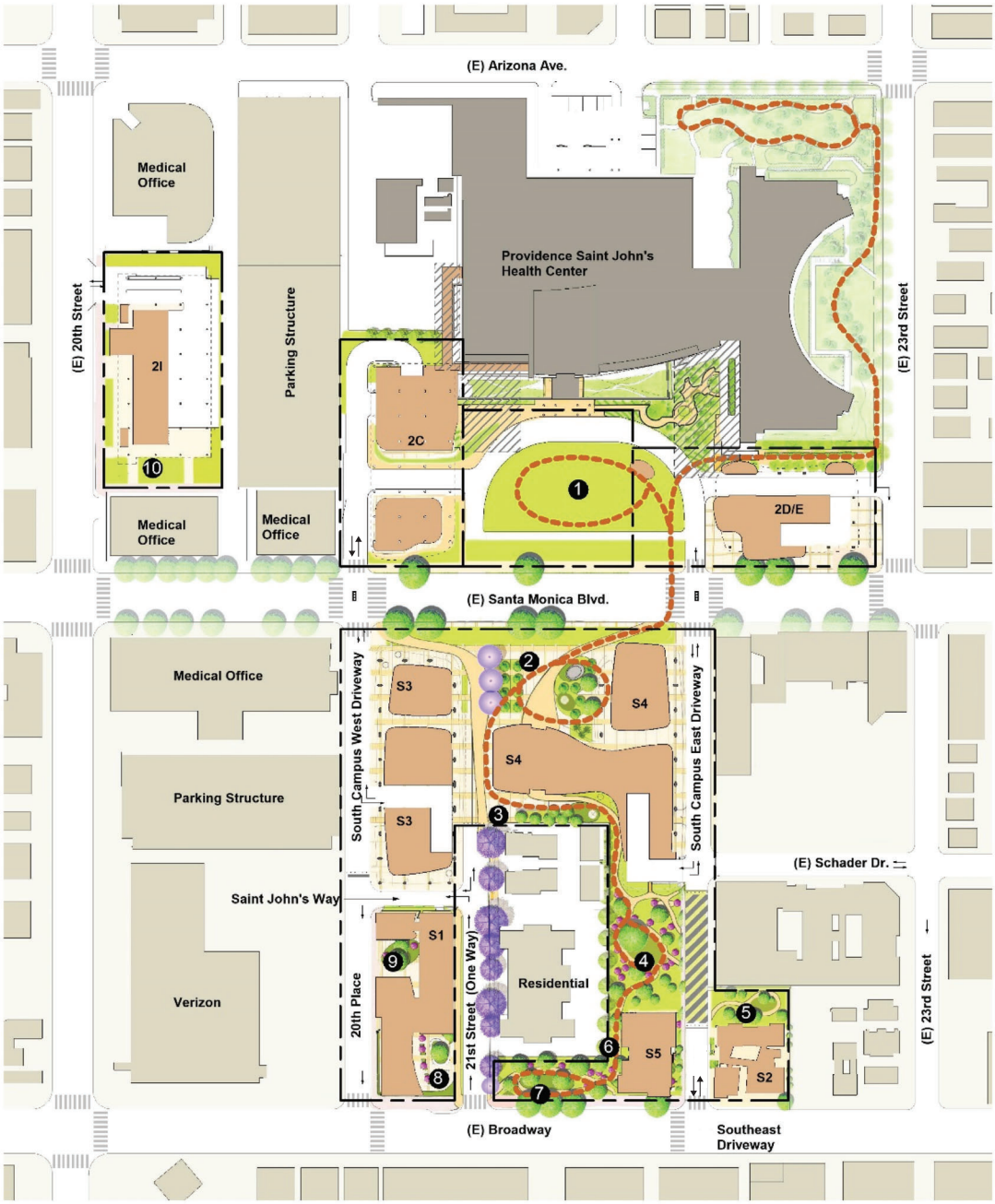


SOURCE: Perkins Eastman, 2019

Providence Saint John's Health Center Phase II Project

Figure 2-7
Proposed Vehicular Parking

ESA



LEGEND

1. Mullin Plaza
2. Saint John's Square
3. Woodland Garden
4. Sun Garden
5. Multi Family Housing
6. Visitor Housing
7. South Garden
8. Day Care
9. CFDC
10. 2I Open Space

Wellness Walk

D170258.00

SOURCE: Perkins Eastman, 2017

Providence Saint John's Health Center Phase II Project

Figure 2-8
Proposed Open Space

ESA

2.6.9.2 Site S2: Multifamily Housing Open Space

The 20-foot setback area between the Multifamily Housing (S2) building and the property line of the existing multifamily residential building located at 1440 23rd Street would include landscaped open space, providing a buffer between the two buildings and providing areas for passive recreation such as seating/reading for residents of the Multifamily Housing building and their visitors.

2.6.9.3 Site 2I: 20th Street Medical Building Open Space

As part of the 20th Street Medical Building development, Site 2I would be improved with ground-level open space that would serve PSJHC's visitors, employees and patients.

2.6.9.4 Site S4: Saint John's Square and Woodland Garden

As part of development on Site S4, a new open space area, Saint John's Square, would be created along Santa Monica Boulevard between the S3 and S4 buildings. Given the proximity of this open space to Santa Monica Boulevard, it is envisioned that this open space would be activated including through opportunities for outdoor dining and outdoor programs and special events such as health fairs. Saint John's Square would include space for a commercial kiosk, Saint John's Café.

The 30-foot setback area between the Education & Conference Center and East Ambulatory Care & Research Building (S4) and the northern property line of the existing multifamily residential units located at 1427 and 1433 21st Street would be landscaped and would provide a buffer (tentatively called the Woodland Garden) between the existing residences and the new Education & Conference Center and East Ambulatory Care & Research Building.

2.6.9.5 Site S5: Sun Garden and South Garden

Two new ground-level open space areas would be created as part of the Site S5 development: the Sun Garden (to the north of the Visitor Housing building) and the South Garden (to the west of the Visitor Housing building along Broadway). The Sun Garden would encourage pedestrian activity on the South Campus and provide a buffer between the new Phase II Project buildings and the existing multifamily residential buildings to the northeast and northwest. Given the proximity of residential uses to this open space area, it is envisioned that the Sun Garden would provide opportunities for passive recreation activities such as eating, reading, strolling and exercising. The South Garden would enhance the pedestrian environment along Broadway with landscaping and provide opportunities to read and eat outdoors and spaces for strolling and exercise stations. There would also be a landscaped setback area between the new Visitor Housing (S5) building and the eastern property line of the existing Geneva Plaza senior housing site.

2.6.9.6 Site 2D/E: Mullin Plaza

As part of development on Site 2D/E, the existing open space area within the Mullin Plaza driveways would be expanded and redesigned to facilitate more active use of the plaza open space by employees, patients, visitors and neighbors. The expanded Mullin Plaza open space is envisioned to provide areas for everyday use such as outdoor dining, seating/reading, and waiting for patients and families, as well as special events such as musical events. The redesigned Mullin Plaza may include a commercial kiosk, the Mullin Plaza Café.

2.6.10 Architecture and Design

The specific design for the individual Phase II buildings would be based on both the respective Phase II Development Site's context and the important health care and related programs within each of the buildings. The buildings adjacent to Santa Monica Boulevard are envisioned to form a harmonious ensemble with PSJHC's other existing and proposed buildings along Santa Monica Boulevard while enhancing the pedestrian realm. The portion of Broadway adjacent to the Phase II Development Sites would be transformed through the addition of open space areas and buildings with a strong street presence that have distinctly different architectural styles in response to their different (non-medical) context. And, 20th Street would be enhanced with a contemporary building that adds visual interest and activates the street.

Each of the Phase II buildings would be designed closer in time to when the corresponding amended or new development review is filed for each building, and further, each of the Phase II buildings and open space areas would undergo review by the Architectural Review Board (ARB) and/or Planning Commission, as applicable. The following describes the design concept for each of the Phase II sites.

2.6.10.1 West Ambulatory Care & Research Building (S3)

The West Ambulatory Care & Research Building (S3) would serve several important functions, including housing important health care and medical research uses and contributing to an enhanced pedestrian realm, in part by framing the new Saint John's Square open space. Its location along Santa Monica Boulevard adjacent to a medical building and parking structure are relevant considerations regarding future building design.

The building facade is defined as three core parts: base, middle and top. At the base along Santa Monica Boulevard and the new Saint John's Square, the ground floor is envisioned to have glazed areas to promote visibility and vibrant activity and attract active ground floor uses. The base is envisioned to have an arcade at the perimeter and a smaller footprint than the upper levels that is broken up further by a pedestrian passageway connecting the South Campus West Driveway and Saint John's Square. These attributes would promote pedestrian activity and circulation outside rather than inside the building. The building's middle (2nd, 3rd, and 4th floors) would project beyond the base to accommodate the important health care uses and form a distinctive horizontal armature on the façade. The building's middle would be appropriately articulated through design features such as vertical fins and angled bay windows. The building's top would be distinguished such as through a rhythm of vertical panels that may extend up to form a parapet around the roof deck. Additional screening for mechanical equipment would be provided as needed.

2.6.10.2 Child and Family Development Center Building (S1)

The design for the Child and Family Development Center (S1) would take into consideration the two distinct programs housed in this building, namely the early childhood education program (i.e., the Daycare use) and the Child and Family Development Center use. Secured open space would be provided for the early childhood education program. It is envisioned that the architecture for this building would be more playful with a broad color palette to add visual interest and brighten this stretch of Broadway.

2.6.10.3 Multifamily Housing Building (S2)

The Multifamily Housing (S2) building would enhance Broadway by providing a new street presence that complements and relates to its context, including the new three-story mixed-use housing projects that are to be located outside of the PSJHC Campus to the east. The siting of the building closer to Broadway provides an appropriate urban edge and also provides the opportunity for a generous landscaped open space area on the north side adjacent to the existing multi-family residential building. The design is intended to be distinctly different from the South Campus buildings fronting on Santa Monica Boulevard that house health care uses.

2.6.10.4 West Ambulatory & Acute Care Building (2C)

The design intent for the West Ambulatory & Acute Care Building (2C) is to accommodate the important health care uses provided within the building in a manner that enhances the overall health and well-being of its occupants, relates harmoniously to the existing Phase I Keck building and the other medical buildings along Santa Monica Boulevard, and provides a visually interesting backdrop for the new and expanded Mullin Plaza open space area on the North Campus.

The building's design is envisioned to be contemporary and complementary to, rather than competitive with, the design of the existing Phase I Keck Building. The building's design would take into consideration the horizontal datum lines and glazing on the existing Phase I Keck Building. The Cross element on the existing Phase I Keck Building would continue to be the primary visual identifier of the North Campus. In order to encourage use of the Mullin Plaza and Saint John's Square open space areas and enhance the experience for patients and visitors, waiting areas for patients and visitors are planned to be located as much as possible on the building's eastern side with direct views of the Mullin Plaza and Saint John's Square.

The building facade is defined as three core parts: base, middle and top. The ground floor would have the smallest footprint, thereby maximizing ground level open space, and is broken up further by a passageway allowing for more direct pedestrian access from the building's west side to the building's lobby, the existing Phase I Keck Building, and Mullin Plaza. Pedestrian-oriented design features, such as glazing, are envisioned for the ground floor. The building's middle would have appropriate articulation and complement the architecture of the existing Phase I Keck Building. The building's top would be designed to reduce the building's perceived height through strategies such as stepping back from the middle façade and using materials with a lighter quality.

Several Pedestrian Connections are envisioned between the West Ambulatory & Acute Care Building (2C) and the existing Phase I Keck Building in order to serve important functional purposes (i.e. efficient transport of materials, staff and patients). The aesthetic design of these Pedestrian Connections would assist in integrating the different architectural styles of the two buildings.

The Pedestrian Connection over Santa Monica Boulevard connecting the West Ambulatory & Acute Care Building (2C) and the West Ambulatory Care & Research Building (S3) is envisioned with a glass façade and an expression of lightness to complement both buildings.

2.6.10.5 Education & Conference Center and East Ambulatory Care & Research Building (S4)

The Education & Conference Center and East Ambulatory Care & Research Building (S4) is anticipated to be the most visually prominent building along Santa Monica Boulevard on the South Campus. It would serve the important purposes of housing new critical health care uses and education uses as well as framing the new Saint John's Square open space. In addition, it would also form a harmonious ensemble with the other medical buildings located along Santa Monica Boulevard.

The Education & Conference Center and East Ambulatory Care & Research Building (S4) would be split into two sections. This approach breaks down the building's massing and provides distinctive identities for the Education and Conference Center uses in the West Section and the ambulatory care (Hospital/Health Center) and Health and Wellness Center uses in the East Section.

The West Section, which houses the Education and Conference Center, is envisioned to have a dramatic glazed façade opposite the existing Phase I Howard Keck Diagnostic Center on the North Campus. The ground floor would have a generous floor-to-floor height with a recessed entrance from Saint John's Square to enhance the pedestrian realm. The design would optimize visibility of the educational, training and conference activities taking place inside the building through strategies such as a pattern of light screens. The top floor is envisioned to have a canopy over the rooftop garden terrace in order to support and promote use of this space, including for multipurpose functions and events. On the west, there would be a two-level connection (at the 3rd and 4th floors) to the West Ambulatory Care and Research Building (S3) to provide doctors, researchers and patients easy access to the various health care and research uses distributed between the two buildings. The two-level connection is envisioned with a glass façade and an expression of lightness to complement both buildings.

The East Section, which houses ambulatory care and Health and Wellness Center uses, is defined by three core parts: base, middle and top. The based (ground floor) adjacent to Santa Monica Boulevard and Saint John's Square would have large glazed areas to promote visibility and vibrant activity. Structural columns would extend down to define and reinforce the pedestrian realm. The middle portion of the East Section (2nd through 5th floors) would integrates glazed areas and would be appropriately articulated through design features such as vertical fins and angled bay windows. The middle portion's floorplates would project beyond the base to accommodate the important health care uses and form a distinctive horizontal armature on the façade. The East Section's top floor would be distinguished through a series of vertical panels that may extend up to form a parapet around the roof deck. Additional screening for mechanical equipment would be provided as needed.

2.6.10.6 Visitor Housing (S5)

The design of the Visitor Housing (S5) building would take into consideration the design and massing of the existing Geneva Plaza housing building to the west and the new off-site mixed-use housing buildings to the east. Along Broadway, the ground floor would include pedestrian-oriented design characteristics and engage with the South Garden open space area to the west (in front of the existing Geneva Plaza senior housing building). Above the ground floor, the building would

incorporate a mix of materials to create a visually interesting articulated façade. The building's top floor is envisioned to have its lightest character to relate to the sky. Rooftop mechanical equipment would be screened through the use of louvers. The design is intended to be distinctly different from the South Campus buildings fronting on Santa Monica Boulevard that house health care uses.

2.6.10.7 East Ambulatory & Acute Care Building (2D/E)

The design intent for the East Ambulatory & Acute Care Building (2D/E) is to accommodate the important health care uses provided within the building in a manner that enhances overall health and well-being of its occupants, relates harmoniously to the existing Phase I Keck and CSS buildings and the other medical buildings along Santa Monica Boulevard, and creates a strong presence at the corner of 23rd Street and Santa Monica Boulevard.

The building's design is envisioned to be subservient and complementary to, rather than competitive with or overpowering, the design of the existing Phase I Keck and CSS Buildings. The building facade is defined as three core parts: base, middle and top. The base (ground floor) would have the smallest footprint, thereby maximizing the ground-level open space and allowing for vehicular ingress/egress on the site. The building's middle would have appropriate articulation. The building's top would be designed to reduce the building's perceived height through strategies such as stepping back from the middle façade and using materials with a lighter quality.

An above-grade Pedestrian Connection is envisioned between the East Ambulatory & Acute Care Building (2D/E) and the existing Phase I CSS Building in order to serve important functional purposes (i.e. efficient transport of materials, staff and patients). This Pedestrian Connection is envisioned with a glass façade and an expression of lightness to complement both buildings.

2.6.10.8 20th Street Medical Building (2I)

The 20th Street Medical Building (2I) would add visual interest to 20th Street with a unique, contemporary design. Given the location of Site 2I, the building is intended to have a distinctly different design compared to the PSJHC Phase I and Phase II buildings fronting on Santa Monica Boulevard.

The building's ground level would incorporate pedestrian-oriented design elements, including glazing and multiple pedestrian entrances to promote activity at street level. This level would have the smallest floor plate in order to provide ground-level open space for building patients, visitors and PSJHC employees. The building's main vertical circulation elements would be located on the 20th Street façade and specifically designed to create visual interest and activate this building frontage. This design feature also has the important functional purposes of incorporating daylighting and view strategies into the design and freeing the floor plates on the two upper levels for greater flexibility for health care uses. The upper level would incorporate a strong architectural statement. Additional screening for mechanical equipment would be provided as needed.

2.6.10.9 Saint John's Café and Mullin Plaza Café

The Saint John's Café and Mullin Plaza Café buildings would be designed as part of an overall design concept for the open space areas in which they are respectively located (Saint John's Square and Mullin Plaza). The buildings would be modest in scale and are intended to aid in enlivening and enhancing pedestrian use of the surrounding open space areas.

2.6.11 Safety and Security

Security staff will maintain a relationship with the Santa Monica Police Department ("SMPD") and Santa Monica Fire Department ("SMFD") particularly for special events to ensure coordination during emergencies, and will call 911 immediately if SMPD or SMFD response is required. Additionally, PSJHC staff will be on the premises at all times. Existing security measures used at PSJHC, such as alarm systems, 24-hour security guards/patrols, and card-controlled access after-hours, would be maintained and incorporated into the Phase II Project. Lastly, an emergency response plan will be prepared in case of earthquake, fire, and wind to assist patients, staff, and visitors and to coordinate with City departments.

2.6.12 Lighting and Signage

Outdoor lighting would be designed to facilitate safe and comfortable use of the Campus by pedestrians, bicyclists, and vehicles and to support wayfinding around and through the Campus. Lighting would be designed to appropriately respond to location, neighboring uses, purpose, activity, and activity level. Outdoor lighting would be provided in accordance with Section 9.21.080 of the SMMC. As such, lighting fixtures would be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties.

Interior lighting would be designed with occupancy sensors and dimming, where feasible and appropriate, to minimize energy use.

The Project would incorporate a variety of informational, wayfinding and identification signage. Wayfinding/directional signage for vehicles, bicyclists and pedestrians would be integrated throughout the Campus. These signs would generally be free-standing/monument signage. There would also be building identification signage, including for building names and addresses, mounted on buildings to identify buildings, services and entrances. Except as may be provided in the DA or approved by the ARB, the signage would be consistent with Chapter 9.61 of the SMMC.

2.6.13 Sustainability Features

Sustainability features have been incorporated into the planning for the Phase II Master Plan, including with respect to building locations, location of specific uses in proximity to other uses, prioritizing pedestrian and bicycle circulation in and around PSJHC, and minimizing single-occupancy vehicle use and vehicles circulating around the area. Sustainability strategies would be considered early in the design stage of individual Phase II buildings and would vary based on the building's uses and location. Sustainability strategies and measures to be considered include, but are not limited to, optimizing passive strategies, operable windows, solar photovoltaic (PV) panels, solar water heating, green roofs, low-flow fixtures, high-performance building envelopes, energy-

efficient HVAC and lighting systems, and interior materials with low volatile organic compounds (VOCs).

Both long-term and short-term bicycle parking would be provided throughout the North and South Campuses. The approximate locations for the bicycle parking are shown above in Figure 2-5. The number of parking spaces shall be provided in accordance with SMMC Table 9.28.140, which requires one short-term bicycle parking space for every 4,000 square feet of floor area and one long-term bicycle parking space for every 2,000-3,000 square feet of floor area (depending on the use). Upon full Phase II Project implementation, PSJHC would have more than 60 new short-term bicycle parking spaces and 120 new long-term bicycle parking spaces added to its North Campus and more than 100 new short-term spaces and more than 200 new long-term spaces added to its South Campus.

Showers and clothes lockers for employees would also be provided throughout the North and South Campuses. In accordance with SMMC Section 9.28.170(B)(1), a minimum of two showers would be provided in Phase II Buildings 2C, 2D/E, 2I, S3 and S1 while a minimum of four showers would be provided in Building S4. Consistent with SMMC Section 9.28.170(B)(2), lockers for clothing and other personal effects would be provided at a ratio of 75% of the long-term employee bicycle parking spaces required. Upon full Phase II Project implementation, PSJHC would have more than 90 new clothes lockers on its North Campus and more than 100 new clothes lockers on its South Campus.

Electric Vehicle (EV) Charging Stations would be provided throughout the North and South Campuses. All Phase II Project facilities with more than 50 parking spaces would provide at least two charging stations plus one for each additional 50 parking spaces consistent with SMMC Section 9.28.160(B)(2).

Designated parking for carpools and vanpools would be provided throughout the North and South Campuses in accordance with SMMC Section 9.28.150.

The PSJHC Campus is also governed by a TDM program. Pursuant to the TDM program, PSJHC provides many incentives for its employees to reduce single-occupancy vehicle trips to the Campus. These incentives include, but are not limited to: providing employees that commute using public transit free transit passes (Big Blue Bus or Metro EZ Pass), providing free vanpools for employees outside a 15-mile radius of the Campus, providing additional financial incentives to employees for each day they do not drive alone to Campus, rideshare matching services, and a guaranteed ride home program. Additional and/or enhanced TDM measures would also be negotiated as part of the Development Agreement process for the Phase II Master Plan.

2.6.14 Utilities

The Phase II Master Plan includes certain changes to utilities located on and around the PSJHC Campus.

2.6.14.1 Water

Due to the construction of the subterranean garage beneath the northern portion of 21st Street, the existing water line in the northern portion of 21st Street would require relocation. As illustrated in **Figure 2-9**, *Water Service*, two options are available to relocate the water line, one of which would be implemented as part of the Project, which are described as follows:

1. Option 1 consists of removing and replacing the existing 12-inch water line in 21st Street and routing the new water line at the ceiling of the proposed subterranean parking of Building S4. Buildings S4 and S3 could be serviced by this line or by the line on Santa Monica Boulevard. Building S1 could be serviced by the existing line in 21st Street or the existing line in Broadway. Lateral locations are subject to change.
2. Option 2 consists of the removal of the existing 12-inch water line in the north half of 21st Street to accommodate the proposed subterranean parking of Building S4. The line would be capped at the extent of the removal. In addition to cutting and capping the existing line, a new water main is proposed between Buildings S1 and S3 where it would then turn north along the proposed South Campus West Driveway. The line would connect to the existing main in Santa Monica Boulevard. Building S1 and S3 could be serviced by the proposed main in South Campus West Driveway. Buildings S5 and S2 would connect to the existing water main in Broadway. Building S4 would connect to the existing water main in Santa Monica Boulevard. The existing residential buildings (not part of PSJ's property) would connect to the remaining water line in the southern portion of 21st Street.

2.6.14.2 Sewer

The proposed sewer improvements are shown in **Figure 2-10**, *Sewer Service*. As part of the S3 development, the northern portion of the existing 18-inch sewer in 21st Street (portion of 21st Street that would be vacated) would be removed. As part of the S3 development, a new sewer line is proposed in the proposed 20th Place/South Campus West Driveway running from Broadway to Santa Monica Boulevard (to accept the flow from Building S1 and S3). This work would take place during the construction of 20th Place and South Campus West Driveway and would be completed prior to issuance of the Certificate of Occupancy for the S1 building or S3 building, whichever is earlier. Additionally, there would be new sewer laterals that connect the proposed buildings to the existing public sewers.

LEGEND:

OPTION 1 WATER LINE ROUTING: — W —

OPTION 2 WATER LINE ROUTING: — W —

PROPOSED OPTION 1 LATERAL:

PROPOSED OPTION 2 LATERAL:

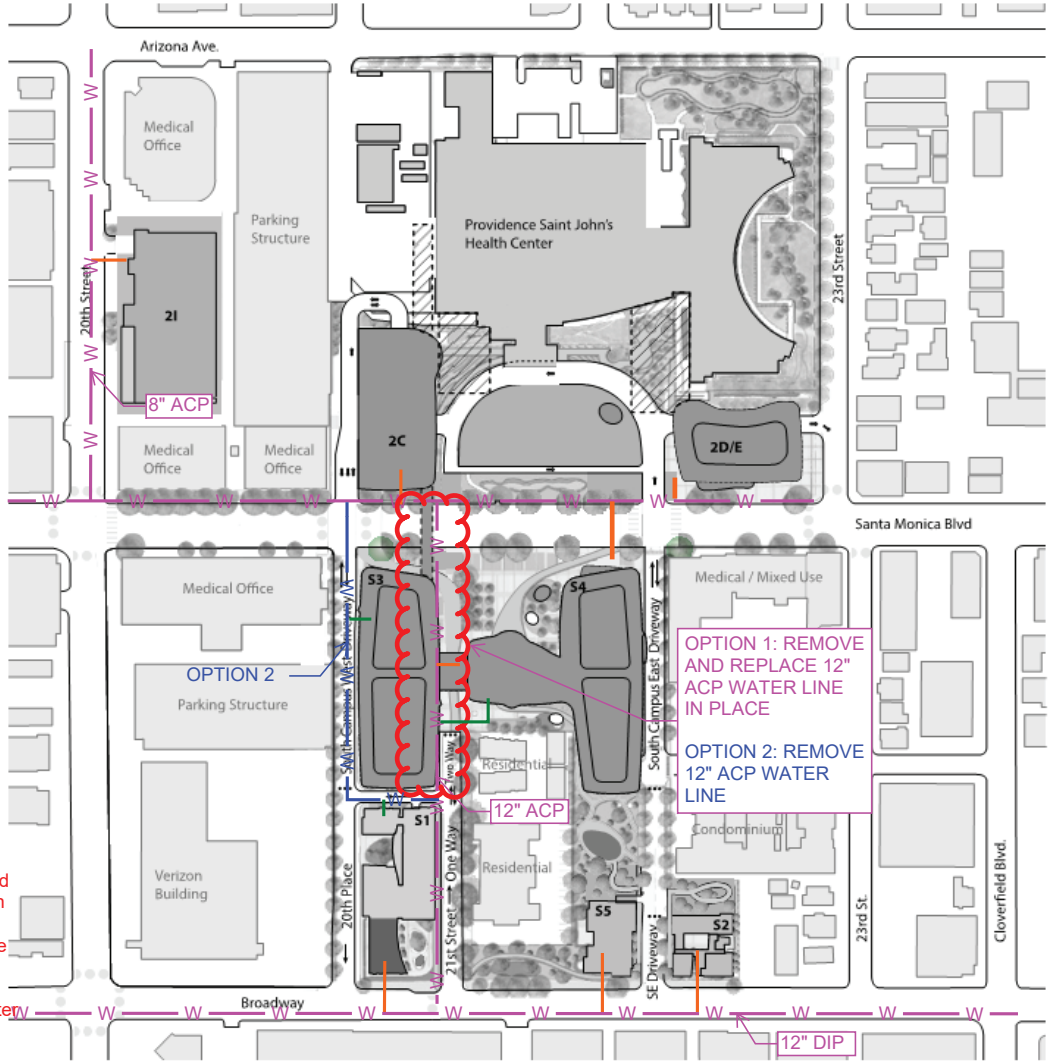
NOTE: LOCATION OF EXISTING AND PROPOSED SERVICES ARE APPROXIMATE LOCATIONS AND ARE SCHEMATIC. PLEASE CONSULT ASBUILTS AND SURVEY FOR MORE ACCURATE LOCATION.

OPTION 1 EXPLANATION

Option 1 for the proposed Providence St. John's Campus consists of removing and replacing the existing 12" ACP in 21st street and routing the new water line at the ceiling of the proposed subterranean parking of S4. Buildings S4 and S3 can be serviced by this line or by the line on Santa Monica Blvd. S1 can be serviced by the existing line in 21st Street or the existing line in Broadway. Lateral locations are subject to change.

OPTION 2 EXPLANATION

Option 2 for the proposed Providence St. John's Campus consists of the removal of the existing 12" ACP water line in the north half of 21st Street to accommodate for the proposed subterranean parking of Building S4. The line will be capped at the extent of the removal. In addition to cutting and capping the existing line, a new water main is proposed between S1 and S3 where it will then turn North along the proposed South Campus West Driveway. The line would connect to the existing main in Santa Monica Blvd. Building S1 and S3 could be serviced by the proposed main in South Campus West Driveway. Buildings S5 and S2 will connect to the existing water main in Broadway. Building S4 will connect to the existing water main in Santa Monica Blvd. The existing residential buildings (not part of PSJ's property) would connect to the remaining water line in the southern portion of 21st Street.



D170258.00

SOURCE: KPFF Consulting Engineers, Fire and Domestic Water Study – Providence Saint John's Health Center Phase II Project, August 2018

Providence Saint John's Health Center Phase II Project

Figure 2-9
Water Service

ESA

SEWER SERVICE

LEGEND:

EXISTING SEWER LINE — SS

PROPOSED RELOCATION OF SEWER LINE: — SS

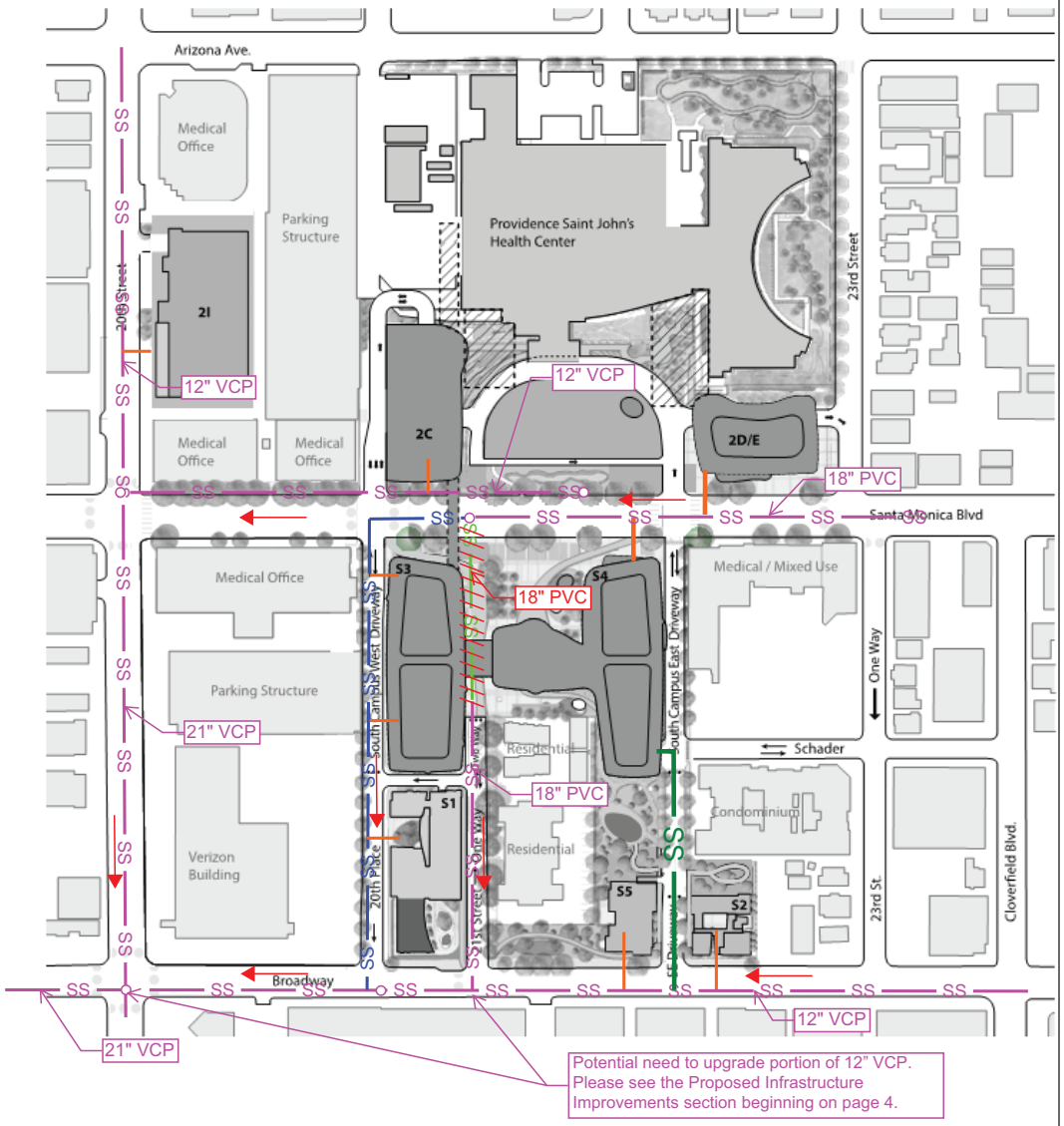
POSSIBLE LATERAL LOCATIONS:

SEWER LINE TO BE REMOVED: SS

POSSIBLE S4 ROUTING: — SS

NOTE: LOCATION OF EXISTING AND PROPOSED SERVICES ARE APPROXIMATE LOCATIONS AND ARE SCHEMATIC. PLEASE CONSULT ASBUILTS AND SURVEY FOR MORE ACCURATE LOCATION.

The project consists of the removal of the existing 18" PVC sewer line in the north half of 21st Street to accommodate for the proposed subterranean parking of Building S4 . The line will be capped at the extent of the removal. To accept the flow from Building S1 and S3 a new sewer line is proposed in the proposed 20th Place and South Campus West Driveway. The line will connect to an existing Manhole in Santa Monica Blvd, run West along Santa Monica Blvd and turn south along the proposed 20th Place to connect to an existing 12" VCP in Broadway Avenue. The proposed line is essentially parallel to the existing 18" PVC line in 21st Street. It is believed that if the existing 18" PVC flows adequately that the proposed adjacent parallel line in 20th Place should do the same. During design, it may become infeasible to route the sewage from the south most portion of Building S4 to the North to connect to the existing sewer line in Santa Monica Blvd. If this becomes the case, a sewer line is proposed to run from the south of S4, along SE Driveway and connect into the existing sewer main in Broadway. Prior to the issuance of a building permit for Buildings S3, S4, and 2C, additional sewer monitoring will be required to determine whether additional upgrades are needed. Please see the Proposed Infrastructure Improvements section beginning on page 4.



Not to scale

D170258.00

SOURCE: KPFF Consulting Engineers, Sanitary Sewer Study – Providence Saint John's Health Center Phase II Project, April 16, 2019

Providence Saint John's Health Center Phase II Project

Figure 2-10
Proposed Sewer Infrastructure

ESA

Potential Additional Upgrades Related to Building S3 or S4

Prior to the issuance of a development review permit for the earlier of the S3 building or the S4 building, Saint John's would prepare an updated sewer study to be reviewed and approved by the City. Such study would determine if future project flows (during dry and wet weather conditions) would cause the City's 12-inch and 21-inch sewer lines on Broadway to exceed the hydraulic planning criteria on page 47 in the City's 2017 Sanitary Sewer System Master Plan (identified in the Sewer Study) or its successor to. If the study (as approved by the City) determines that there will be exceedances of the hydraulic planning criteria due to project flows, Saint John's would perform sewer upgrades prior to issuance of a Certificate of Occupancy for the earlier of the S3 or S4 building. The primary criteria used to establish adequately-sized sewer piping is if the Peak Wet Weather Flow (PWWF) depth to diameter ratio is less than 0.75 and the minimum velocity is 2 ft/s.

Necessary sewer upgrades may include, but are not limited to:

(a) Installing a new adequately-sized sewer line(s) along Broadway and 20th Street to convey sewer flows generated by S3 (and S4, if applicable) to the Colorado Avenue 24-inch Vylon sewer line; or

(b) Upsizing the existing 12-inch sewer on Broadway to 18-inch from 21st Street to 20th Street and re-activating and placing in service the existing 12-inch VCP line (currently abandoned) along 20th Street from Broadway to Colorado Avenue to divert sewer flows from the Broadway 21-inch VCP sewer line to the Colorado Avenue 21-inch Vylon sewer line.

Potential Additional Upgrades Related to Building S4

The S4 building is proposed to connect to the existing 18-inch sewer on Santa Monica Boulevard; however, during the design phase it may be determined that it is infeasible to route the sewage from the southern portion of Building S4 to the north to connect to the existing sewer line in Santa Monica Boulevard. In this case, prior to issuance of Certificate of Occupancy for Site S4, a new adequately-sized sewer line would be constructed and run south from Building S4 to Broadway along the South Campus East Driveway and South East Driveway. The adequately-sized sewer line shall be sized to ensure the line would not exceed the hydraulic planning criteria on page 47 in the City's 2017 Sanitary Sewer System Master Plan (shown above) or its successor to. The primary criteria used to establish adequately-sized sewer piping is if the PWWF depth to diameter ratio is less than 0.75, and if the minimum velocity is 2 ft/s.

The City, based on its review of this preliminary sewer study, has indicated that additional sewer upgrades may be necessary and may include, but are not limited to:

(a) If not already completed as part of the S3 development, installing a new adequately-sized sewer line(s) along Broadway and 20th Street to convey sewer flows generated by S4 to the Colorado Avenue 24-inch Vylon sewer line (if Saint John's sewer discharge to Broadway from Site S4 to a maximum of 21,200 GPD, the extent of any upgrades may be reduced or eliminated); or

(b) If not already completed as part of the S3 development, upsizing the existing 12-inch sewer on Broadway to 18-inch from 21st Street to 20th Street, restricting sewer discharge to Broadway from Site S4 to a maximum of 21,200 GPD, and re-activating and placing in service the existing 12-inch VCP line (currently abandoned) along 20th Street from

Broadway to Colorado Avenue to divert sewer flows from the Broadway 21-inch VCP sewer line to the Colorado Avenue 21-inch Vylon sewer line.

Upgrades shall be performed to the satisfaction of the City's Water Resources Engineer prior to issuance of a Certificate of Occupancy for the S3 or S4 building, whichever is earlier.

Potential Additional Upgrades Related to Building 2C

Prior to the issuance of the development review permit for the 2C building, additional sewer monitoring would be required to determine if future project flows (during dry and wet weather conditions) would cause the City's 12-inch line on Santa Monica Boulevard to exceed the hydraulic planning criteria on page 47 in the City's 2017 Sanitary Sewer Master Plan (included above). The primary criteria used to establish adequately-sized sewer piping is if the PWWF depth to diameter ratio is less than 0.75, and if the minimum velocity is 2 ft/s.

The City, based on its review of this preliminary sewer study, has indicated that additional sewer upgrades may be necessary and may include, but are not limited to:

(a) Upsizing the existing 12-inch sewer line on Santa Monica Boulevard from the 2C connection to 20th Street.

(b) Upsizing the existing 21-inch sewer line along 20th Street, from Santa Monica Boulevard to Broadway.

Upgrades shall be performed to the satisfaction of the City's Water Resources Engineer prior to issuance of a Certificate of Occupancy for the 2C building.

2.6.14.3 Natural Gas

Due to the construction of the subterranean garage beneath the northern portion of 21st Street, the existing natural gas line in the northern portion of 21st Street would be removed. A connection between two existing gas lines located beneath Broadway would be installed and the gas lines may be upgraded, if warranted. Proposed natural gas service improvements are illustrated in **Figure 2-11**, *Natural Gas Service*, below.

2.6.14.4 Electrical

Due to the construction of the subterranean garage beneath the northern portion of 21st Street, the existing electrical line in the northern portion of 21st Street would be removed. A new relocated electrical line is proposed to connect to existing lines in Santa Monica Boulevard and Broadway subject to review and approval by Southern California Edison. Proposed electrical service improvements are illustrated in **Figure 2-12**, *Electrical Service*, below.

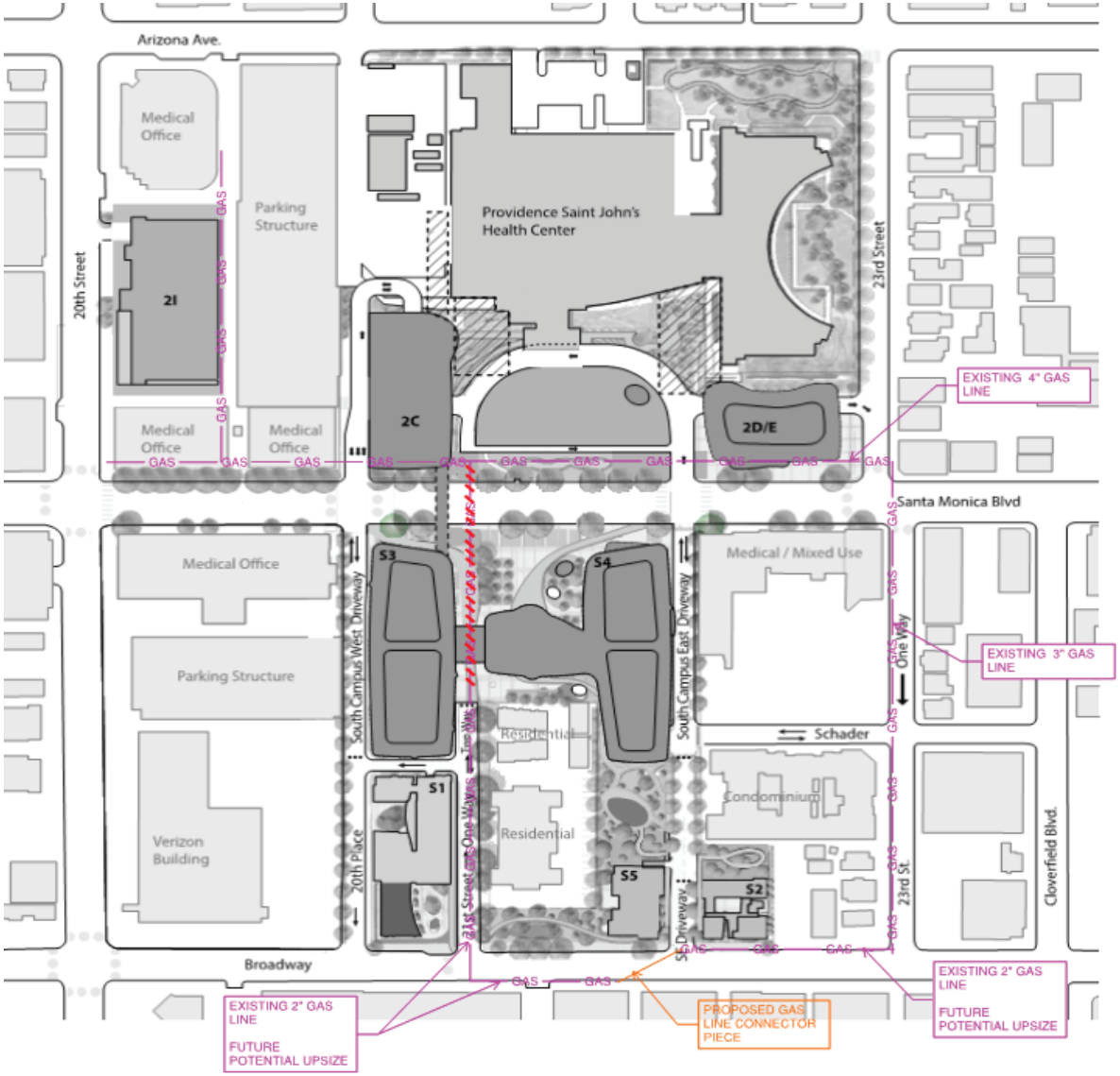
LEGEND:

EXISTING GAS LINE — GAS —

GAS LINE TO BE REMOVED: ~~GAS~~

PROPOSED RELOCATION OF GAS LINE:

NOTE: LOCATION OF EXISTING AND PROPOSED SERVICES ARE APPROXIMATE LOCATIONS AND ARE SCHEMATIC. PLEASE CONSULT ASBUILTS AND SURVEY FOR MORE ACCURATE LOCATION.



D170258.00

SOURCE: Providence Saint John's Health Center, 2017

Providence Saint John's Health Center Phase II Project

Figure 2-11
Natural Gas Service

ESA

LEGEND:

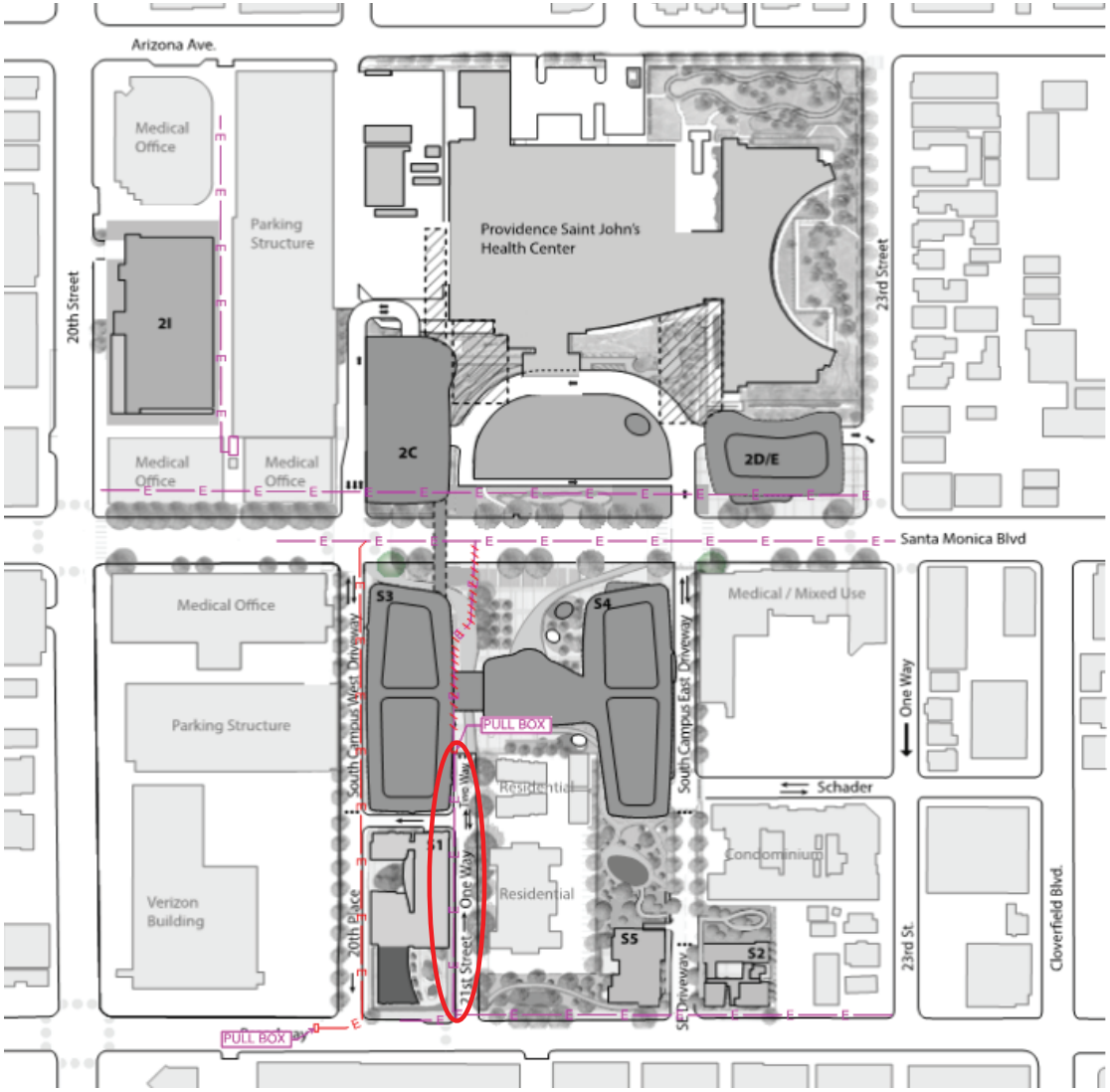
EXISTING ELECTRICAL LINE — E —

PROPOSED RELOCATION OF ELECTRICAL LINE: — E —

REMOVE EXISTING ELECTRICAL LINE: ++E++

NOTE: LOCATION OF EXISTING AND PROPOSED SERVICES ARE APPROXIMATE LOCATIONS AND ARE SCHEMATIC. PLEASE CONSULT ASBUILTS AND SURVEY FOR MORE ACCURATE LOCATION.

THE PROPOSED RELOCATION SHOWN FROM SANTA MONICA BLVD IS A "WORST CASE" SCENARIO. DEPENDING ON THE DETERMINATION OF EDISON THE RELOCATION MAY ONLY BE REQUIRED FROM THE SOUTHERN PART OF BUILDING S3 TO BROADWAY.



D170258.00

SOURCE: Providence Saint John's Health Center, 2018

Providence Saint John's Health Center Phase II Project

Figure 2-12
Electrical Service

ESA

2.7 Construction Activities

2.7.1 Phase II Phasing Plan

The Phase II Master Plan includes a Phase II Phasing Plan that has been designed to achieve the following goals:

- Minimize construction impacts on neighboring residents and businesses by allowing for staging on PSJHC-owned properties to the extent possible.
- Maximize the amount of PSJHC-owned parking that is available during each stage of construction and ensuring PSJHC provides sufficient parking for its various users throughout implementation of the plan.
- Allow the existing Child & Family Development Center and the John Wayne Cancer Institute (both of which are located on Phase II Development Sites and are being replaced as part of the Phase II Project) to remain in operation until their new facilities on the South Campus are completed.
- Ensure that the existing Phase I Keck and CSS Buildings on the North Campus remain fully operational and accessible through all stages of construction.
- Prioritize construction of the Multifamily Housing.
- Ensure sufficient time to raise the funds needed to build each of the Phase II Project buildings.
- The Phase II Phasing Plan includes specific time periods during which PSJHC is required to file a new or amended/revised DRP application for each Phase II development. The precise construction timeline for each Phase II development depends on the timing of entitlements and permit processing. For the purposes of this EIR, construction work is assumed to begin in the 2nd Quarter of 2021 with occupancy and operation of the first Phase II building commencing in late 2022, and completion of the entire construction program by the end of 2041.

The Phase II Phasing Plan consists of two alternate phasing plans: Phasing Plan A and Phasing Plan B, as noted above. Phasing Plan B, presented below, provides a similar type and intensity of land uses as Phasing Plan A, but would be implemented with an alternative construction schedule that allows PSJHC to pursue development on Site 2C as the first stage of construction. This EIR addresses both Phasing Plans A and B, as appropriate, throughout the document. Pursuant to the Phase II Master Plan, PSJHC would elect either Phasing Plan A or B prior to beginning the first stage of construction for the Phase II Project. The following describes the details of each of the Phasing Plans.

2.7.1.1 Phasing Plan A

The stages of Phase II Project construction and implementation provided for in Phasing Plan A are described in the following paragraphs and are illustrated in associated figures as indicated below:

Stage A1 (Second Quarter 2021 – First Quarter 2025):

PSJHC would have one year from approval of the Phase II Master Plan to achieve deemed complete status as to amended/revised DRP applications filed with the City for the Child & Family Development Center (S1), the West Ambulatory Care & Research Building (S3), and the Multifamily Housing (S2). In addition to the details for each development described above, (a) the

existing multifamily housing building located at 1417-1423 21st Street on the S4 site may be demolished as part of the S3 demolition phase and (b) after the new West Ambulatory Care & Research Building (S3) is completed, the existing John Wayne Cancer Institute located at 2200 Santa Monica Boulevard on the S4 site may be demolished. The areas cleared by the demolition of these two buildings are anticipated to be used for temporary/interim construction staging and parking until the S4 Site is developed. Project-related activities associated with this stage are illustrated below in **Figure 2-13a**, *Phasing Plan A – Stage A1*.

Stage A2 (First Quarter 2025 – Second Quarter 2027):

PSJHC would have four years from approval of the Phase II Master Plan to achieve deemed complete status as to an amended/revised DRP application filed with the City for the 20th Street Medical Building (2I). Project-related activities associated with this stage are illustrated below in **Figure 2-13b**, *Phasing Plan A – Stage A2*.

Stage A3 (Fourth Quarter 2027 – First Quarter 2031):

PSJHC would have seven years from approval of the Phase II Master Plan to achieve deemed complete status as to an amended/revised DRP application filed with the City for the West Ambulatory & Acute Care Building (2C). Construction activities associated with this stage are illustrated below in **Figure 2-13c**, *Phasing Plan A – Stage A3*.

Stage A4:

Part 1 (Fourth Quarter 2031 – Third Quarter 2036): PSJHC would have eleven years from approval of the Phase II Master Plan to achieve deemed complete status as to an amended/revised DRP application filed with the City for the Education & Conference Center and East Ambulatory Care & Research Building (S4), which includes Saint John's Square and its café.

Part 2 (Second Quarter 2037 – Fourth Quarter 2038): PSJHC would have seventeen years from approval of the Phase II Master Plan to achieve deemed complete status as to an amended/revised DRP application filed with the City for the Visitor Housing (S5), which includes the Sun Garden and South Garden open space areas.

Project-related activities associated with this stage are illustrated below in **Figure 2-13d**, *Phasing Plan A – Stage A4*.

Stage A5 (Second Quarter 2038 – Fourth Quarter 2041):

PSJHC would have seventeen years from approval of the Phase II Master Plan to achieve deemed complete status as to an amended/revised DRP application filed with the City for the East Ambulatory & Acute Care Building (2D/E), which includes the redesigned and expanded Mullin Plaza and its café. Project-related activities associated with this stage are illustrated below in **Figure 2-13e**, *Phasing Plan A – Stage A5*.

Stage A1 - Multifamily Replacement Housing Building (S2), Child & Family Development Center (S1) and West Ambulatory Care & Research Building (S3)

Includes the following:

Multifamily Replacement Housing Building (S2)

- Removal of the existing surface parking on Site S2 (a portion of Lot "H").
- Construction of the Multifamily Replacement Housing (S2) and its associated open space.
- Creation of the Southeast Driveway.

West Ambulatory Care & Research Building (S3) and Child & Family Development Center (S1)

- Demolition of the existing MRI buildings located on Site S3.
- Removal of the existing surface parking located on Sites S1 and S3 (Lots "B" & "I").
- Demolition of the existing multifamily housing building on the S4 site in order to provide temporary/interim construction staging/parking.
- Construction of the west subterranean parking structure below Sites S1 and S3.
- Construction of the new Child & Family Development Center (S1).
- Creation of the new street called 20th Place and the new street called Saint John's Way.
- Vacation of the northern portion of 21st Street, with the southern portion of 21st Street becoming a primarily one-way northbound street (with a small two-way portion).
- Construction of the West Ambulatory Care & Research Building (S3).
- Creation of a new driveway called South Campus West Driveway.
- Relocation of the existing traffic light at the intersection of Santa Monica Boulevard and 21st Street to align with the new intersection created by the new South Campus West Driveway.
- Closure of the existing egress driveway from the North Campus to Santa Monica Boulevard and re-routing of this egress through the West Lot to the new intersection created by the new South Campus West Driveway.
- Demolition of the existing John Wayne Cancer Institute on the S4 site in order to provide additional temporary/interim construction staging/parking.

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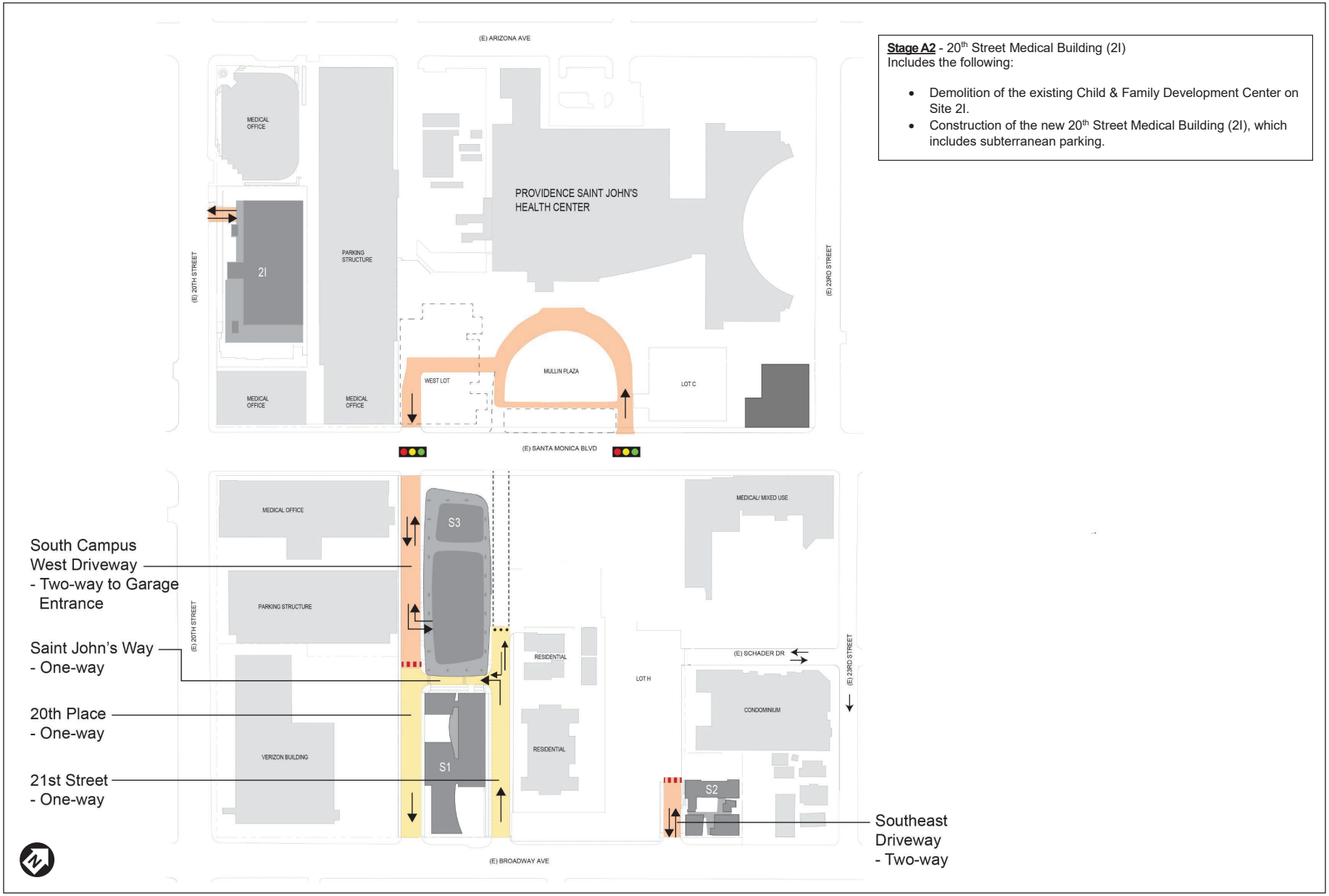
SOURCE: Providence Saint John's Health Center, 2017

Providence Saint John's Health Center Phase II Project

Figure 2-13a
Phasing Plan A - Stage A1

ESA

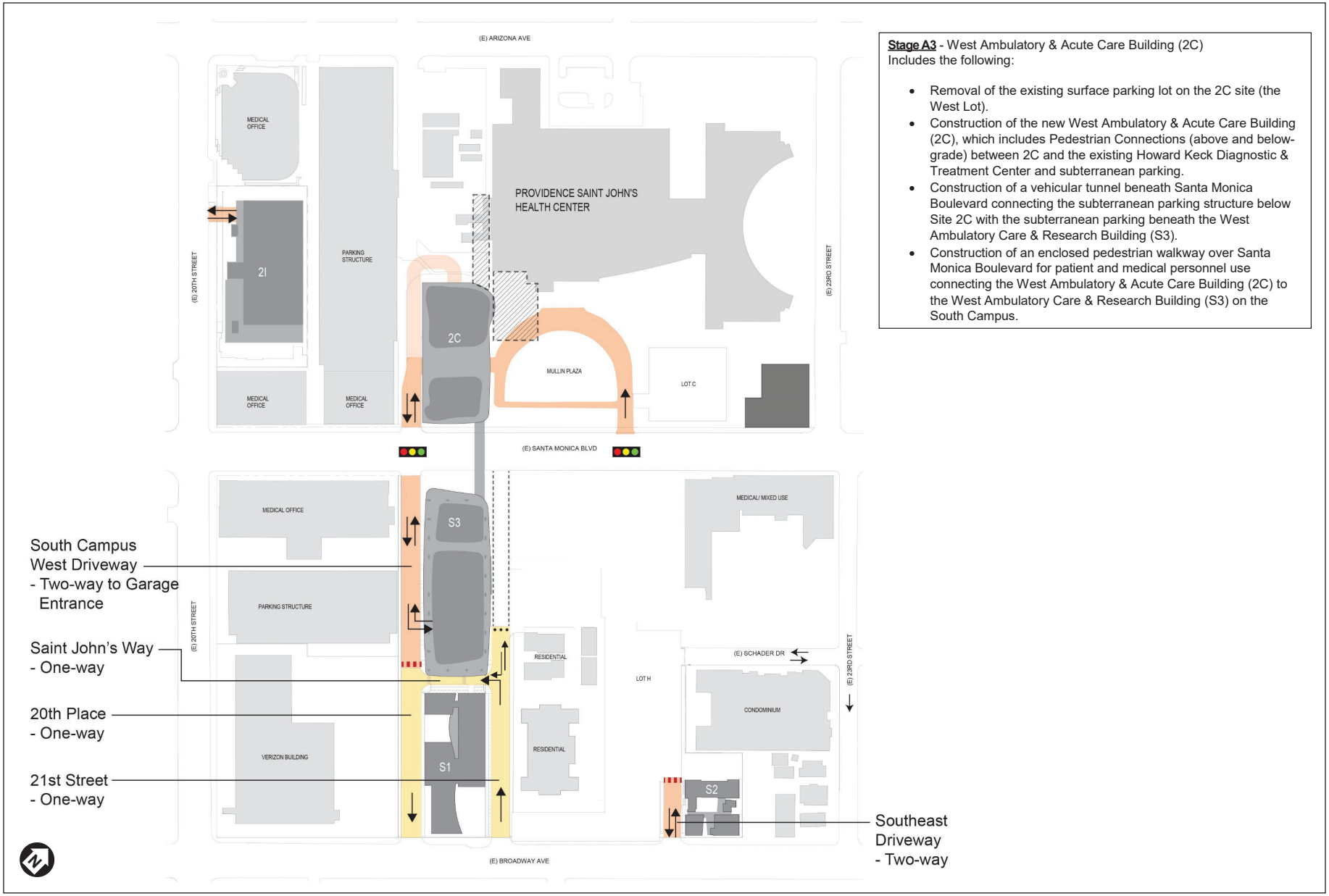


SOURCE: Providence Saint John's Health Center, 2017

Providence Saint John's Health Center Phase II Project

Figure 2-13b
Phasing Plan A - Stage A2

ESA



Stage A3 - West Ambulatory & Acute Care Building (2C)
Includes the following:

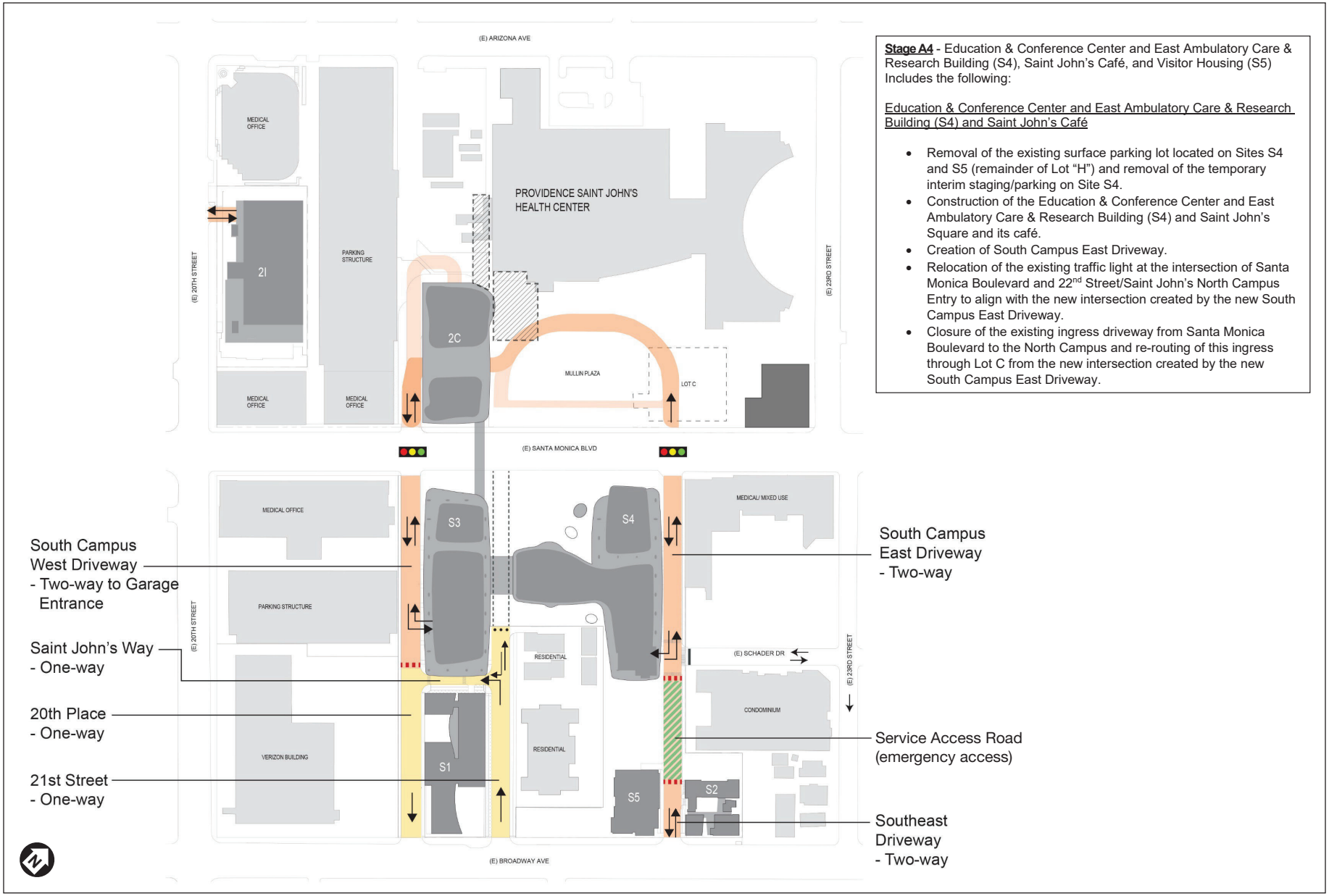
- Removal of the existing surface parking lot on the 2C site (the West Lot).
- Construction of the new West Ambulatory & Acute Care Building (2C), which includes Pedestrian Connections (above and below-grade) between 2C and the existing Howard Keck Diagnostic & Treatment Center and subterranean parking.
- Construction of a vehicular tunnel beneath Santa Monica Boulevard connecting the subterranean parking structure below Site 2C with the subterranean parking beneath the West Ambulatory Care & Research Building (S3).
- Construction of an enclosed pedestrian walkway over Santa Monica Boulevard for patient and medical personnel use connecting the West Ambulatory & Acute Care Building (2C) to the West Ambulatory Care & Research Building (S3) on the South Campus.

SOURCE: Providence Saint John's Health Center, 2017

Providence Saint John's Health Center Phase II Project

Figure 2-13c
Phasing Plan A - Stage A3

ESA



Stage A4 - Education & Conference Center and East Ambulatory Care & Research Building (S4), Saint John's Café, and Visitor Housing (S5) Includes the following:

Education & Conference Center and East Ambulatory Care & Research Building (S4) and Saint John's Café

- Removal of the existing surface parking lot located on Sites S4 and S5 (remainder of Lot "H") and removal of the temporary interim staging/parking on Site S4.
- Construction of the Education & Conference Center and East Ambulatory Care & Research Building (S4) and Saint John's Square and its café.
- Creation of South Campus East Driveway.
- Relocation of the existing traffic light at the intersection of Santa Monica Boulevard and 22nd Street/Saint John's North Campus Entry to align with the new intersection created by the new South Campus East Driveway.
- Closure of the existing ingress driveway from Santa Monica Boulevard to the North Campus and re-routing of this ingress through Lot C from the new intersection created by the new South Campus East Driveway.

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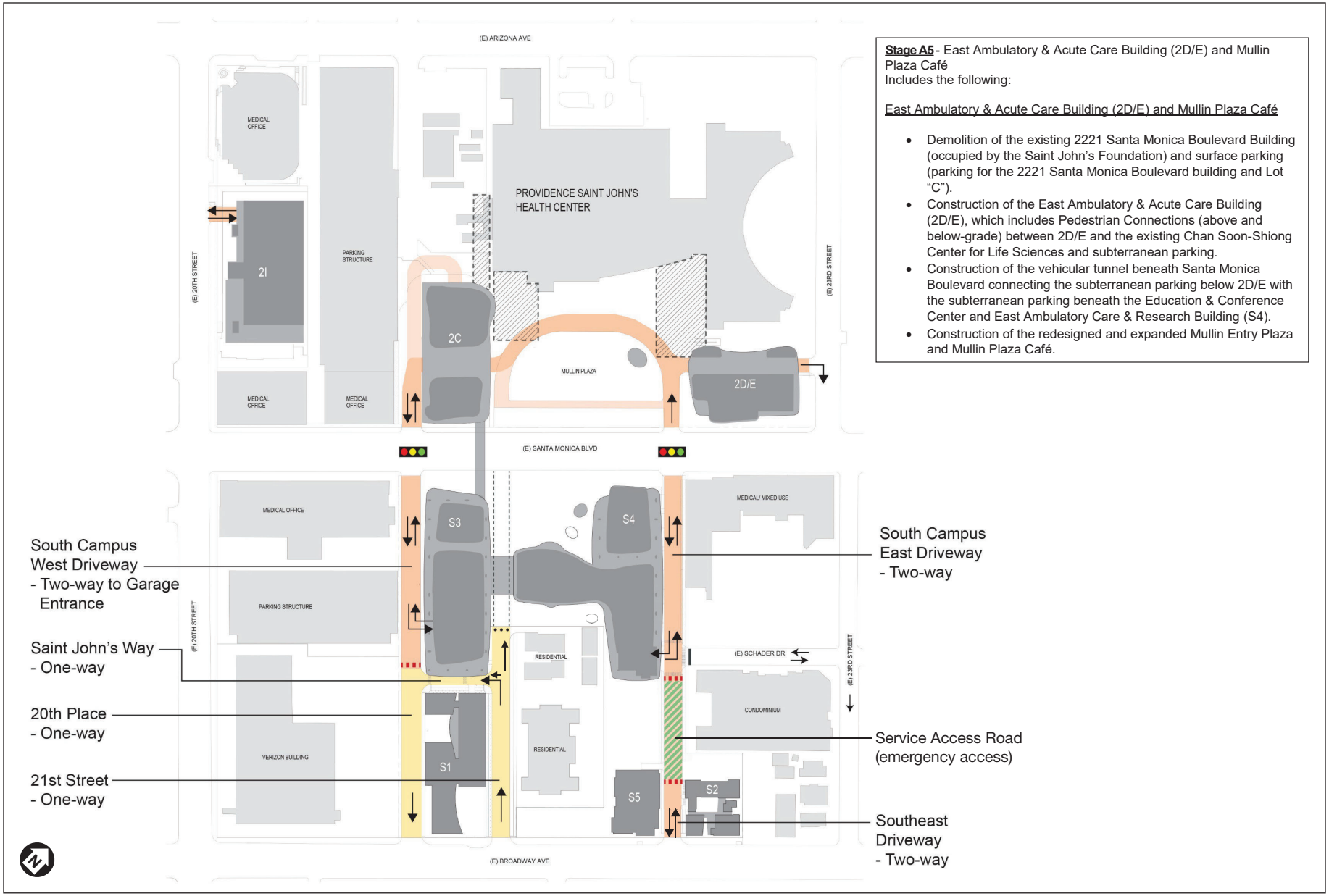
SOURCE: Providence Saint John's Health Center, 2017

Providence Saint John's Health Center Phase II Project

Figure 2-13d
Phasing Plan A - Stage A4

ESA



Stage A5 - East Ambulatory & Acute Care Building (2D/E) and Mullin Plaza Café
Includes the following:

East Ambulatory & Acute Care Building (2D/E) and Mullin Plaza Café

- Demolition of the existing 2221 Santa Monica Boulevard Building (occupied by the Saint John's Foundation) and surface parking (parking for the 2221 Santa Monica Boulevard building and Lot "C").
- Construction of the East Ambulatory & Acute Care Building (2D/E), which includes Pedestrian Connections (above and below-grade) between 2D/E and the existing Chan Soon-Shiong Center for Life Sciences and subterranean parking.
- Construction of the vehicular tunnel beneath Santa Monica Boulevard connecting the subterranean parking below 2D/E with the subterranean parking beneath the Education & Conference Center and East Ambulatory Care & Research Building (S4).
- Construction of the redesigned and expanded Mullin Entry Plaza and Mullin Plaza Café.

SOURCE: Providence Saint John's Health Center, 2017

Providence Saint John's Health Center Phase II Project

Figure 2-13e
Phasing Plan A - Stage A5

ESA

2.7.1.2 Phasing Plan B

The stages of Project construction and implementation provided for in Phasing Plan B are described in the following paragraphs and are illustrated in associated figures as indicated below:

Stage B1 (Second Quarter 2021 – Second Quarter 2026):

PSJHC would have one year from approval of the Phase II Master Plan to achieve deemed complete status as to an amended/revised DRP application filed with the City for the West Ambulatory & Acute Care Building (2C) and the Multifamily Housing (S2). Project activities associated with this stage are shown below in **Figure 2-14a**, *Phasing Plan B – Stage B1*.

Stage B2 (Third Quarter 2026 – Third Quarter 2029):

PSJHC would have five years from approval of the Phase II Master Plan to achieve deemed complete status as to amended/revised DRP applications filed with the City for the Child & Family Development Center (S1) and the West Ambulatory Care & Research Building (S3). In addition to the details for each development described above, (a) the existing multifamily housing building located at 1417-1423 21st Street on the S4 site may be demolished as part of the S3 demolition phase and (b) after the new West Ambulatory Care & Research Building (S3) is completed, the existing John Wayne Cancer Institute located at 2200 Santa Monica Boulevard on the S4 site may be demolished. The areas cleared by the demolition of these two buildings are anticipated to be used for temporary/interim construction staging and parking until the S4 Site is developed. Project-related activities associated with this stage are illustrated below in **Figure 2-14b**, *Phasing Plan B – Stage B2.*

Stage B3 (Third Quarter 2029 – Fourth Quarter 2031):

PSJHC would have nine years from approval of the Phase II Master Plan to achieve deemed complete status as to an amended/revised DRP application filed with the City for the 20th Street Medical Building (2I). Project-related activities associated with this stage are illustrated below in **Figure 2-14c**, *Phasing Plan B – Stage B3*.

Stage B4:

Part 1 (Fourth Quarter 2031 – Third Quarter 2036): PSJHC would have eleven years from approval of the Phase II Master Plan to achieve deemed complete status as to an amended/revised DRP application filed with the City for the Education & Conference Center and East Ambulatory Care & Research Building (S4), which includes Saint John's Square and its café.

Part 2 (Second Quarter 2037 – Fourth Quarter 2038): PSJHC would have seventeen years from approval of the Phase II Master Plan to achieve deemed complete status as to an amended/revised DRP application filed with the City for the Visitor Housing (S5), which includes the Sun Garden and South Garden open space areas. Project-related activities associated with this stage are illustrated below in **Figure 2-14d**, *Phasing Plan B – Stage B4*

Stage B5 (Third Quarter 2038 – Fourth Quarter 2041):

PSJHC would have seventeen years from approval of the Phase II Master Plan to achieve deemed complete status as to an amended/revised DRP application filed with the City for the East Ambulatory & Acute Care Building (2D/E), which includes the redesigned and expanded Mullin Plaza and its café. Project-related activities associated with this stage are illustrated below in **Figure 14e**, *Phasing Plan B – Stage B5*.

Stage B1 - Multifamily Replacement Housing Building (S2) and West Ambulatory & Acute Care Building (2C)
Includes the following:

Multifamily Replacement Housing Building (S2)

- Removal of the existing surface parking on Site S2 (a portion of Lot "H").
- Construction of the Multifamily Replacement Housing Building (S2) and its associated open space.
- Creation of the Southeast Driveway.

West Ambulatory & Acute Care Building (2C)

- Removal of the existing surface parking lot (West Lot) on the 2C site.
- Construction of the West Ambulatory & Acute Care Building (2C), which includes Pedestrian Connections (above and below-grade) between 2C and the existing Howard Keck Diagnostic & Treatment Center and subterranean parking.
- Relocation of the existing traffic light at the intersection of Santa Monica Boulevard and 21st Street to the west (for future alignment with the new South Campus West Driveway).
- Closure of the existing egress driveway from the North Campus to Santa Monica Boulevard and re-routing vehicle egress through the 2C site.

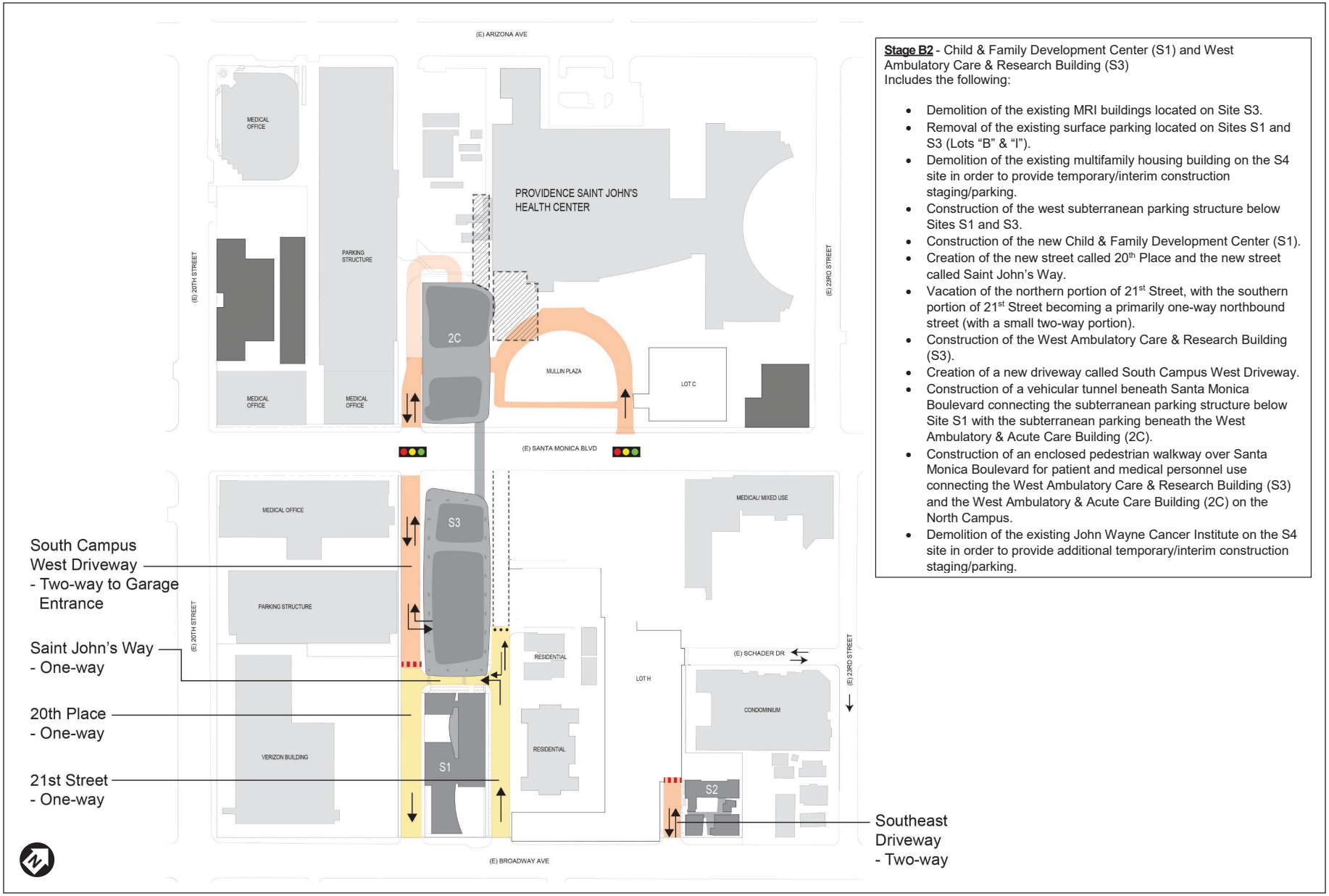
D170258.00

SOURCE: Providence Saint John's Health Center, 2017

Providence Saint John's Health Center Phase II Project

Figure 2-14a
Phasing Plan B - Stage B1

ESA



Stage B2 - Child & Family Development Center (S1) and West Ambulatory Care & Research Building (S3)
Includes the following:

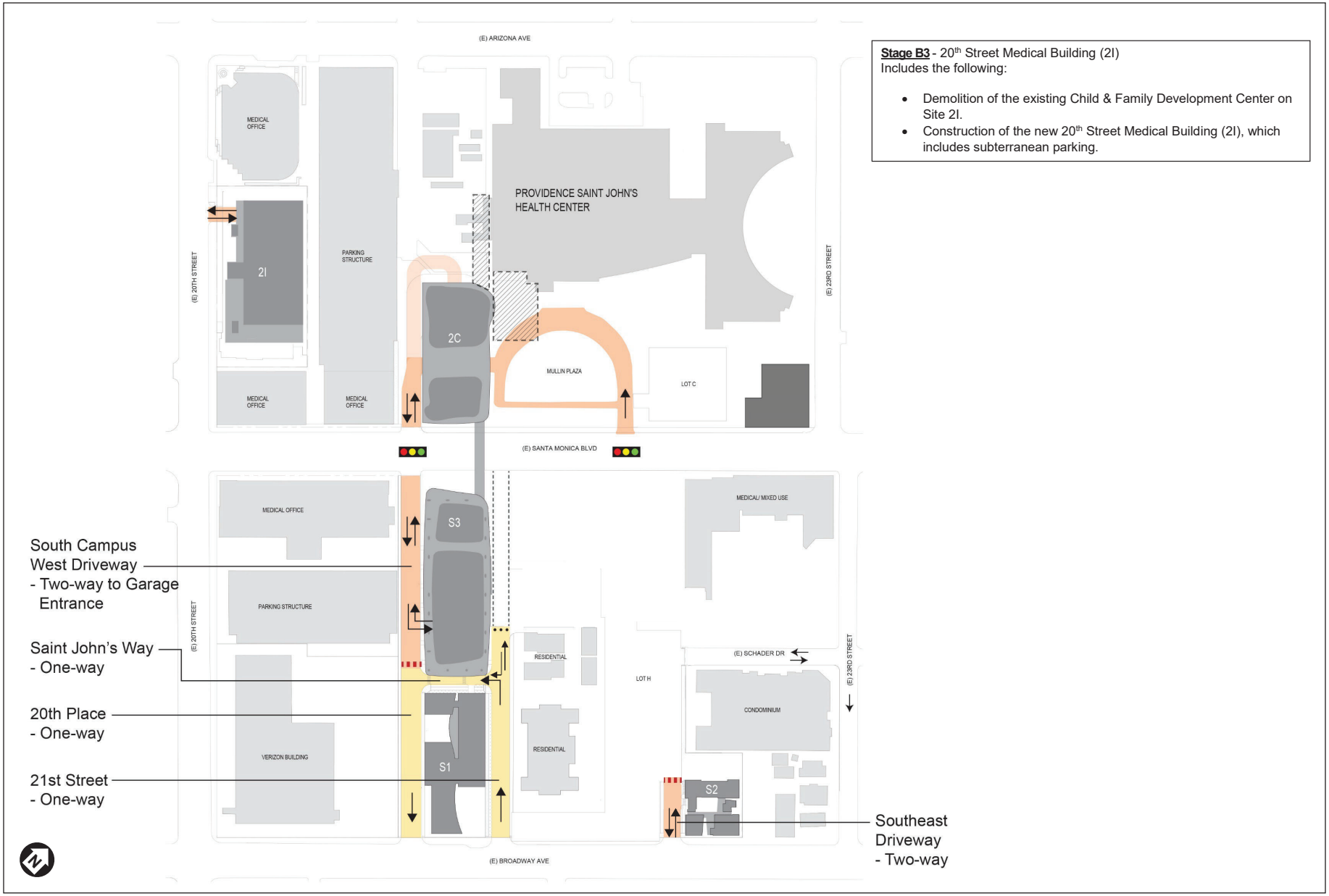
- Demolition of the existing MRI buildings located on Site S3.
- Removal of the existing surface parking located on Sites S1 and S3 (Lots "B" & "I").
- Demolition of the existing multifamily housing building on the S4 site in order to provide temporary/interim construction staging/parking.
- Construction of the west subterranean parking structure below Sites S1 and S3.
- Construction of the new Child & Family Development Center (S1).
- Creation of the new street called 20th Place and the new street called Saint John's Way.
- Vacation of the northern portion of 21st Street, with the southern portion of 21st Street becoming a primarily one-way northbound street (with a small two-way portion).
- Construction of the West Ambulatory Care & Research Building (S3).
- Creation of a new driveway called South Campus West Driveway.
- Construction of a vehicular tunnel beneath Santa Monica Boulevard connecting the subterranean parking structure below Site S1 with the subterranean parking beneath the West Ambulatory & Acute Care Building (2C).
- Construction of an enclosed pedestrian walkway over Santa Monica Boulevard for patient and medical personnel use connecting the West Ambulatory Care & Research Building (S3) and the West Ambulatory & Acute Care Building (2C) on the North Campus.
- Demolition of the existing John Wayne Cancer Institute on the S4 site in order to provide additional temporary/interim construction staging/parking.

SOURCE: Providence Saint John's Health Center, 2017

Providence Saint John's Health Center Phase II Project

Figure 2-14b
Phasing Plan B - Stage B2

ESA

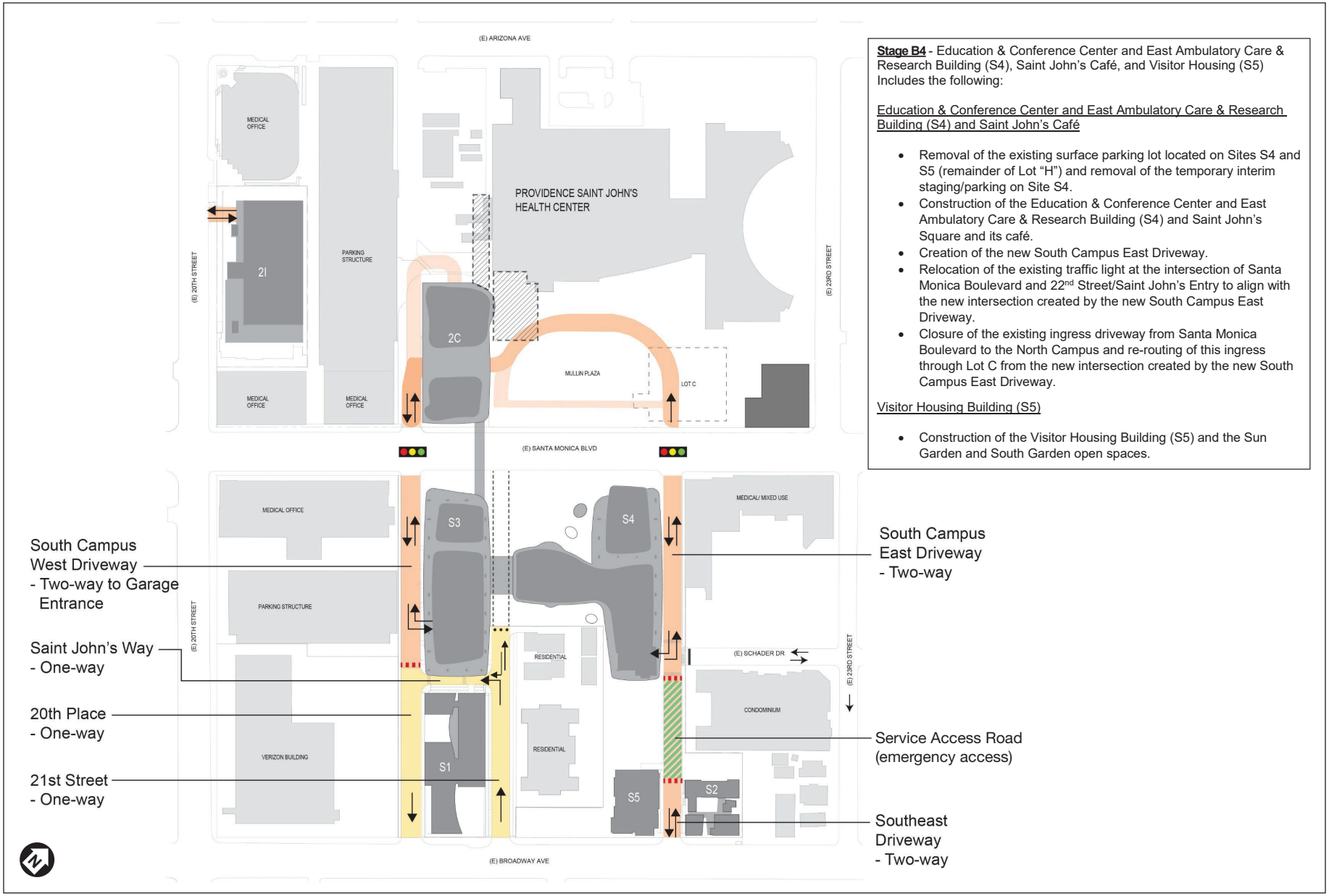


SOURCE: Providence Saint John's Health Center, 2017

Providence Saint John's Health Center Phase II Project

Figure 2-14c
Phasing Plan B - Stage B3

ESA



Stage B4 - Education & Conference Center and East Ambulatory Care & Research Building (S4), Saint John's Café, and Visitor Housing (S5) Includes the following:

Education & Conference Center and East Ambulatory Care & Research Building (S4) and Saint John's Café

- Removal of the existing surface parking lot located on Sites S4 and S5 (remainder of Lot "H") and removal of the temporary interim staging/parking on Site S4.
- Construction of the Education & Conference Center and East Ambulatory Care & Research Building (S4) and Saint John's Square and its café.
- Creation of the new South Campus East Driveway.
- Relocation of the existing traffic light at the intersection of Santa Monica Boulevard and 22nd Street/Saint John's Entry to align with the new intersection created by the new South Campus East Driveway.
- Closure of the existing ingress driveway from Santa Monica Boulevard to the North Campus and re-routing of this ingress through Lot C from the new intersection created by the new South Campus East Driveway.

Visitor Housing Building (S5)

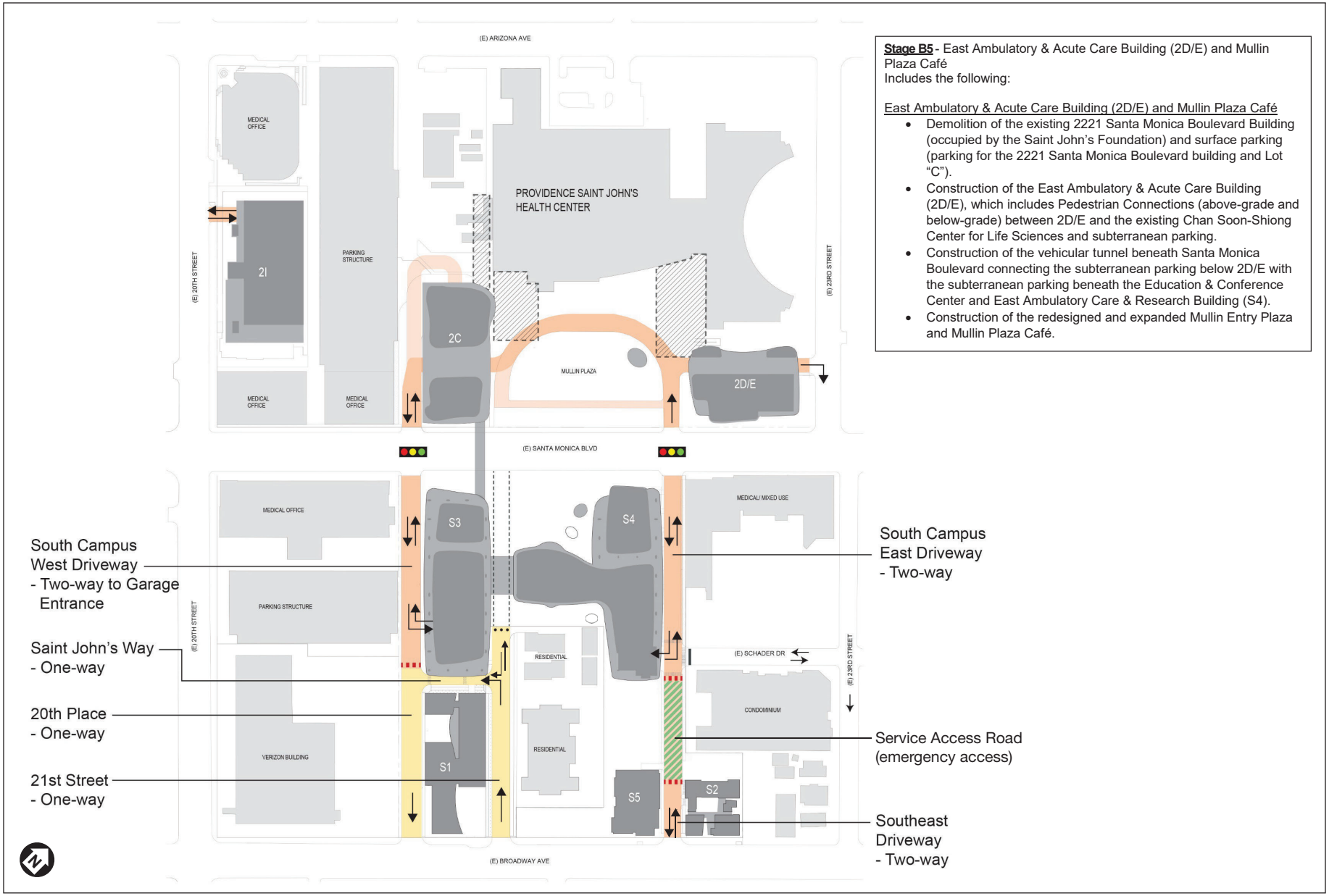
- Construction of the Visitor Housing Building (S5) and the Sun Garden and South Garden open spaces.

SOURCE: Providence Saint John's Health Center, 2017

Providence Saint John's Health Center Phase II Project

Figure 2-14d
Phasing Plan B - Stage B4

ESA



Stage B5 - East Ambulatory & Acute Care Building (2D/E) and Mullin Plaza Café
Includes the following:

East Ambulatory & Acute Care Building (2D/E) and Mullin Plaza Café

- Demolition of the existing 2221 Santa Monica Boulevard Building (occupied by the Saint John's Foundation) and surface parking (parking for the 2221 Santa Monica Boulevard building and Lot "C").
- Construction of the East Ambulatory & Acute Care Building (2D/E), which includes Pedestrian Connections (above-grade and below-grade) between 2D/E and the existing Chan Soon-Shiong Center for Life Sciences and subterranean parking.
- Construction of the vehicular tunnel beneath Santa Monica Boulevard connecting the subterranean parking below 2D/E with the subterranean parking beneath the Education & Conference Center and East Ambulatory Care & Research Building (S4).
- Construction of the redesigned and expanded Mullin Entry Plaza and Mullin Plaza Café.

SOURCE: Providence Saint John's Health Center, 2017

Providence Saint John's Health Center Phase II Project

Figure 2-14e
Phasing Plan B - Stage B5

ESA

2.7.2 Parking During Phase II Implementation

PSJHC currently relies on a combination of owned and leased parking to meet its existing parking demands and is required to submit an annual Parking Management Plan report confirming that it continues to have sufficient parking to satisfy its peak parking demand. The Parking Management Plan report includes updated information about PSJHC's supply and demand. With respect to supply, the Parking Management Plan report documents the overall parking supply as of December 31st of each year including a list and map identifying the location of each parking facility and its distance from PSJHC's main campus and the number of spaces therein. With respect to demand, the Parking Management Plan report documents PSJHC's parking demand as of December 31st based upon updated population counts in each of its user groups. The Parking Management Plan report also discusses any changes PSJHC proposes to the Parking Management Plan. The Phase II Master Plan requires that PSJHC continue to provide annual Parking Management Plan reports to the City during Phase II implementation documenting that it is providing sufficient parking to meet its peak parking demand through a combination of PSJHC's owned and leased parking facilities.

2.7.3 Construction Staffing

Construction staffing for the Project would vary depending on the particular stage of construction activity. **Table 2-4**, *Construction Staffing Summary, Phasing Plan A*, below, summarizes the anticipated number of construction workers for each stage of development in Phasing Plan A. **Table 2-5**, *Construction Staffing Summary, Phasing Plan B*, below, summarizes the anticipated number of construction workers for each stage of development in Phasing Plan B. As shown in Tables 2-4 and 2-5, construction staffing would range from a minimum of eight workers up to a maximum of 180 workers on-site at one time during peak construction activities.

2.8 Required Approvals

As discussed previously, the Phase II Project would require amendments to the existing DA, but in addition, the following entitlements are anticipated to apply to various components of the Project. These approvals and entitlements may include, but are not limited to the following:

- Certification of the Final EIR by the City Council
- City Council approval of amendments to the HASP
- City Council approval of the DA Amendments
- City Council approval of the Child Care Implementation Plan for Phase II
- City Council approval of the amended Santa Monica Community Access Plan for Phase II
- City Council approval of the Phase II Master Plan
- Planning Commission approval of DRPs for each of the ten Phase II Project buildings, subject to City Council approval on appeal
- City approval of the tentative and final subdivision map(s) for the Providence Saint John's campus
- City approval of a street vacation application for the northern portion of 21st Street

- Approval of Architectural Review permits and other appropriate permits granted by local agencies, boards and commissions Approval of removal of street trees as necessary by Urban Forester
- Building permits, demolition permits and related permits [TBD]
- Office of Statewide Health Planning and Development (OSHPD) approvals of certain Phase II Project buildings
- Ongoing OSHPD compliance review during construction of certain Phase II Project buildings.
- Any other incidental discretionary or administrative approvals needed for the construction and operation of the Project.

TABLE 2-4
CONSTRUCTION STAFFING SUMMARY – PHASING PLAN A

Construction Stage	Activity	Estimated Number of Workers
Stage A1		
Site S1	Demolition	14
	Grading/Excavation	14
	Foundations/Concrete Pour	24
	Building Construction	80
	Paving	8
	Architectural Coatings	28
Site S2	Demolition	8
	Grading/Excavation	10
	Foundations/Concrete Pour	12
	Building Construction	60
	Paving	8
	Architectural Coatings	20
Site S3	Demolition	12
	Grading/Excavation	14
	Foundations/Concrete Pour	30
	Building Construction	125
	Paving	12
	Architectural Coatings	32
Demolish S4	Demolition	20
Stage A2		
Site 2I	Demolition	12
	Grading/Excavation	14
	Foundations/Concrete Pour	55
	Building Construction	70
	Architectural Coatings	14
Stage A3		

Construction Stage	Activity	Estimated Number of Workers
Site 2C	Demolition	8
	Grading/Excavation	12
	Foundations/Concrete Pour	30
	Building Construction	110
	Paving	8
	Architectural Coatings	28
Stage A4		
Site S4/St. John's Café	Demolition	8
	Grading/Excavation	20
	Foundations/Concrete Pour	45
	Building Construction	180
	Architectural Coatings	55
Site S5	Building Construction	65
	Architectural Coatings	24
Stage A5		
Site 2D/E/Mullin Plaza Café	Demolition	12
	Grading/Excavation	12
	Foundations/Concrete Pour	30
	Building Construction	110
	Paving	8
	Architectural Coatings	28

SOURCE: Providence St. John's Health Center, 2018.

TABLE 2-5
CONSTRUCTION STAFFING SUMMARY – PHASING PLAN B

Construction Stage	Activity	Estimated Number of Workers
Stage B1		
Site S2	Demolition	8
	Grading/Excavation	10
	Foundations/Concrete Pour	12
	Building Construction	60
	Paving	8
	Architectural Coatings	20
Site 2C	Demolition	8
	Grading/Excavation	12
	Foundations/Concrete Pour	30
	Building Construction	110
	Paving	8
	Architectural Coatings	28
Stage B2		
Site S1	Demolition	14
	Grading/Excavation	14
	Foundations/Concrete Pour	24
	Building Construction	80
	Paving	8
	Architectural Coatings	28
Site S3	Demolition	12
	Grading/Excavation	14
	Foundations/Concrete Pour	30
	Building Construction	125
	Paving	12
	Architectural Coatings	32
Demolish S4	Demolition	20
Stage B3		
Site 2I	Demolition	12
	Grading/Excavation	14
	Foundations/Concrete Pour	55
	Building Construction	70
	Architectural Coatings	14
Stage B4		
Site S4/St. John's Café	Demolition	8
	Grading/Excavation	20
	Foundations/Concrete Pour	45

Construction Stage	Activity	Estimated Number of Workers
	Building Construction	180
	Architectural Coatings	55
Site S5	Building Construction	65
	Architectural Coatings	24
Stage B5		
Site 2D/E/Mullin Plaza Café	Demolition	12
	Grading/Excavation	12
	Foundations/Concrete Pour	30
	Building Construction	110
	Paving	8
	Architectural Coatings	28

SOURCE: Providence St. John's Health Center, 2018.

CHAPTER 3
General Description of Environmental Setting

Section 15125 of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) include a description of the existing environment. This chapter provides a general overview of the environmental setting for the Project, however, detailed information on existing conditions is provided for each environmental topic studied in Chapter 4, *Environmental Impact Analysis*. This chapter also provides an overview of cumulative projects that are considered as part of the future conditions in evaluating cumulative impacts.

3.1 Overview of the Environmental Setting

3.1.1 Santa Monica Context

The City of Santa Monica (City) is an urbanized incorporated community located in west Los Angeles County, approximately 15 miles west of downtown Los Angeles. The City is bounded on the north, south, and east by the City of Los Angeles and on the west by the Pacific Ocean. Surrounding communities include Pacific Palisades to the north, Brentwood and West Los Angeles to the east, and Mar Vista and Venice to the south. Santa Monica is directly accessible from the Los Angeles area via the Interstate-10 freeway (I-10, Santa Monica Freeway) and Interstate-405. The I-10 freeway terminates at its western end at Pacific Coast Highway, which links Santa Monica to Malibu and the Santa Monica Mountains.

The City occupies approximately 8.25 square miles, almost all of which is developed with established residential, commercial, light industrial, and institutional uses. The City is organized around a grid system of streets providing a high level of connectivity within the City and to adjacent communities. This grid street system is interrupted by the I-10 freeway that bisects the City from east to west, dividing neighborhoods and districts north and south of the freeway. Residential neighborhoods are the predominant land use in the City with a wide range of housing types and densities. Commercial land uses include retail, restaurant, entertainment, office, service commercial, and hospital/other medical uses, which are concentrated within the Downtown area and along boulevards and avenues such as Broadway, Wilshire Boulevard, Santa Monica Boulevard, Lincoln Boulevard, and Colorado Avenue. Institutional uses include hospital and health care facilities such as the PSJHC and Santa Monica-Harbor UCLA Medical Center, generally bounded by Wilshire Avenue to the north, 23rd Street to the east, Broadway to the south, and 14th Street to the west.

3.1.2 On-Site Conditions

The Project Site is located in the mid-portion of the City of Santa Monica and includes nine Phase II Development Sites totaling approximately 9.35 acres or 407,100 square feet (sf) located within the greater approximately 20.72-acre Providence Saint John's Health Center (PSJHC) Campus. The PSJHC Campus is bounded by Arizona Avenue in the north, Broadway in the south, 23rd Street in the east, and 20th Street in the west, and is bisected by Santa Monica Boulevard which forms a North Campus and South Campus. The PSJHC Campus is located in the City's Healthcare Mixed-Use District which contains PSJHC and UCLA Medical Center, Santa Monica (UCLA-SM), medical office buildings, residential, and commercial. The Project Site is split between the North and South Campus, with four of the development sites in the North Campus and five in the South Campus. The location of the PSJHC Campus is illustrated in Figure 2-1, *Project Location and Aerial Photograph*, in Chapter 2, Project Description, of this EIR. The boundaries of the Project Site are shown in Figure 2-2, *Phase II Development Sites*.

PSJHC primarily serves Santa Monica and the neighboring communities included in Los Angeles County's Service Planning Area 5. These neighboring communities include Venice, Culver City, Mar Vista, Brentwood, West Los Angeles, West Hollywood, Pacific Palisades, Marina Del Rey, Beverly Hills, Westchester, Ladera Heights, Palms, Cheviot Hills/Rancho Park, and Malibu. Over 70 percent of PSJHC patients are located in Los Angeles County's Service Planning Area 5.

The Project Site is currently fully developed with urban uses, including existing buildings associated with PSJHC (e.g., Child & Family Development Center, Providence Saint John's Foundation Building, John Wayne Cancer Institute, two temporary MRI modular trailers), a 10-unit vacant apartment building, Mullin Plaza, four named surface parking lots (Lots B, C, H, and I), several un-named surface parking lots, and infrastructure improvements (e.g., streets, above- and underground utilities, etc.). The ground surface of the Project Site and greater PSJHC Campus generally slope down from north to south, with an approximately 10-foot elevation differential across the Project Site. The Project Site is almost completely covered in impervious surfaces, except for Mullin Plaza which, in addition to a semi-circular driveway and pick-up/drop-off area for the PSJHC Hospital, includes large areas of landscaping around the central concrete plaza.

The Project Site and greater PSJHC Campus are accessible from the regional transportation network, located approximately 0.9-mile north of the Santa Monica Freeway (Interstate 10) ramps at Cloverfield Boulevard. Additionally, the Project Site is located in close proximity to two Expo Light Rail stations, approximately 0.8-mile northeast of the 17th Street/Santa Monica College Station (at 17th Street and Colorado Avenue) and approximately 0.8-mile northwest of the 26th Street/Bergamot Station (located at 26th Street and Olympic Boulevard) for the Expo Light Rail.

For detailed descriptions of the existing conditions specific to each of the environmental issues analyzed in this EIR, see the Existing Conditions subsections of Sections 4.1 through 4.20 of this EIR.

3.1.3 Surrounding Uses

The Phase I portion of the PSJHC Campus, which abuts the Project Site to the north and to most of the east and west, contains a range of older and newer hospital and medical buildings ranging up to eight stories (or 92 feet) in height. The area surrounding the PSJHC Campus contains a mixture of commercial (including medical) buildings on 20th Street, Arizona Avenue, Santa Monica Boulevard and Broadway, and multifamily residential buildings on Arizona Avenue, 21st Street and 23rd Street. The residential structures in the area range from one to eight stories (or up to 84 feet) in height, while the commercial buildings range one to twelve stories (up to 168 feet) in height. Other uses in the immediate area include two hotels (e.g., the Best Western Plus Gateway Hotel and Ambrose Hotel, two schools (Santa Monica Malibu Unified School District's McKinley Elementary School and Saint Anne School), and newer condominium buildings.

3.2 Cumulative Impacts

CEQA Guidelines Section 15130(a) states that an EIR shall "discuss the cumulative impacts of a project when the project's incremental effect is cumulatively considerable." The CEQA Guidelines define cumulative impacts as "two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts." Section 15355 of the CEQA Guidelines further states that the individual effects can be various changes related to a single project or the change involved in a number of other closely related past, present, and reasonably foreseeable future projects.

The Section 15130 of the CEQA Guidelines allows for the use of two different methods to determine the scope of projects for the cumulative impact analysis:

- **List Method** – A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency.
- **Projections Method** – A summary of projections contained in an adopted General Plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contribution to the cumulative impact.

For purposes of the cumulative impacts analysis for the Project, the EIR has incorporated into its analyses a list of cumulative projects for evaluating cumulative effects. The EIR conservatively assumes that all approved and pending projects will be completed and operational. In addition, the traffic analysis also incorporates a general ambient growth factor to traffic volumes. Accordingly, the cumulative analysis provides a highly conservative estimate of future conditions since it includes both elements listed in CEQA Guidelines Section 15130(b) for the purposes of developing the forecast.

Table 3-1, *Cumulative Projects List* includes a list of cumulative projects through 2042 that are approved, pending, under construction, or recently completed since circulation of the NOP as compiled by the City. **Figure 3-1**, *Cumulative Projects Map,* illustrates the locations of the cumulative projects listed in Table 3-1. The cumulative projects include 112 projects in the City of Santa Monica and 19 in the City of Los Angeles, for a total of 131 cumulative projects.

Environmental topics whose impacts are local in nature take into account the cumulative projects within the geography that is the focus of the environmental topic. Analyses that pertain to City-wide and and/or regional (e.g., County of Los Angeles) analyses, notably impacts regarding population and housing and the provision of services, take into account demographic projections in the City's Land Use and Circulation Element (LUCE) and the Southern California Association of Government's (SCAG's) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS) which account for City-wide and regional growth consistent with the LUCE and the zoning of the adjacent cities and County of Los Angeles (County). Regional issues regarding water supply and wastewater treatment capacity also take into account regional projections such as those provided by SCAG in the 2016-2040 RTP/SCS.

The cumulative analyses for each environmental issue, including a discussion regarding the identification of relevant cumulative projects are provided in Sections 4.1 through 4.21 in Chapter 4 of this EIR.

TABLE 3-1
CUMULATIVE PROJECTS LIST

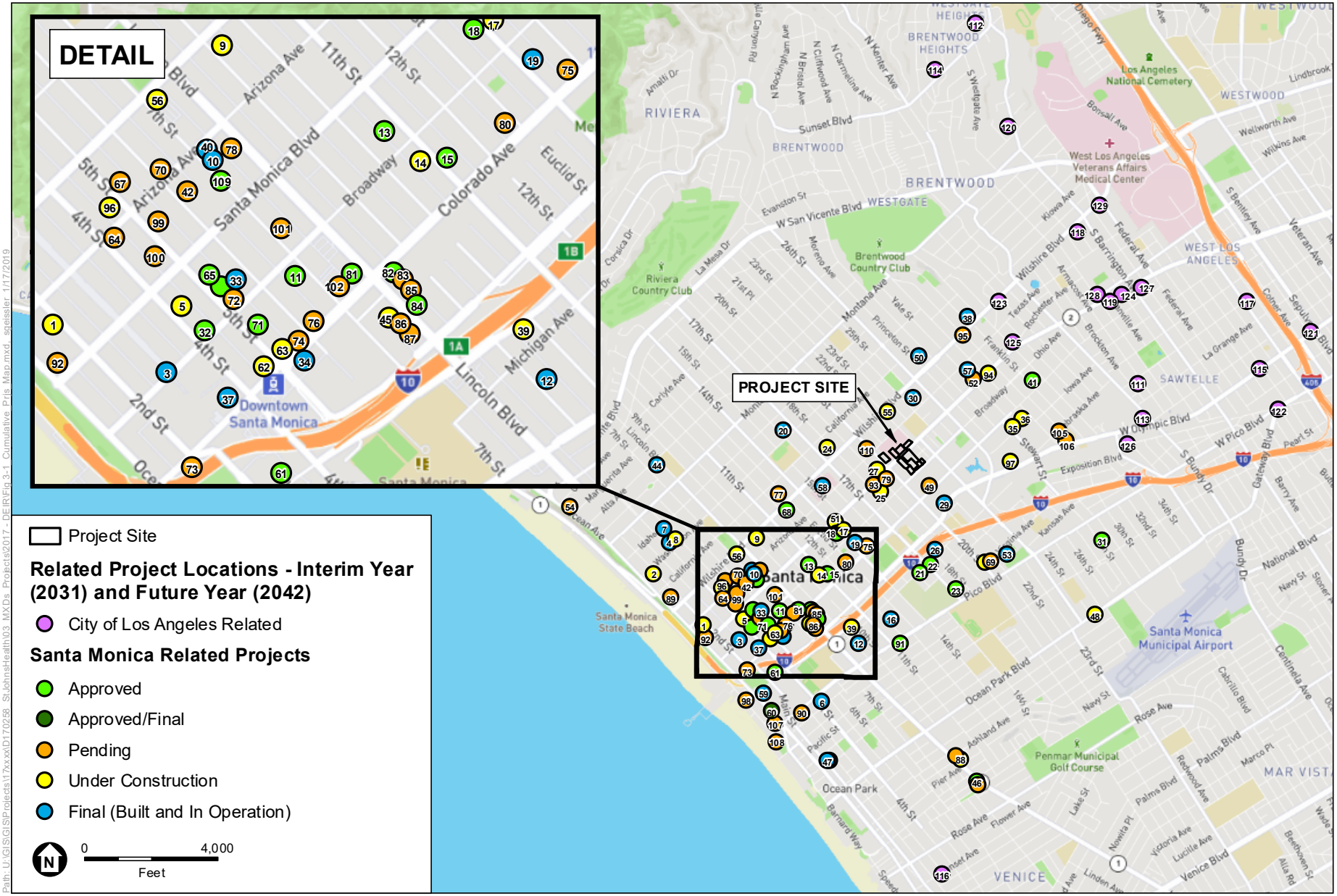
No.	Site Address	Status	Project Type	Size (ksf or DU)
City of Santa Monica Projects				
1	1318 2ND ST	Under construction	Mixed-Use DA	60.50 ksf
2	1012 2ND ST	Under construction	Residential	4.00 DU
3	2316 3RD ST	Final	Residential	3.00 DU
4	947 4TH ST	Final	5-Unit Condominium	5.00 DU
5	1427 4TH ST	Under construction	Retail Office (Michael's Building)	7.5 ksf
6	1919 4TH ST	Final	3-Unit condo	3.00 DU
7	908 5TH ST	Final	Residential	3.00 DU
8	954 5TH ST	Under construction	Residential	2.00 DU
9	1211 9TH ST	Under construction	5-Unit Condominium	5.00 DU
10	1317 7TH ST	Final	Mixed-Use DA	59.60 ksf
11	1514 7TH ST	Approved	Senior Housing (affordable)	26.00 DU
12	1827 9TH ST	Final	Residential	2.00 DU
13	1444 11TH ST	Approved	8-Unit Condominium	8.00 DU
14	1518 11TH ST	Under construction	5-Unit Condominium	6.00 DU
15	1533 11TH ST	Approved	5-Unit Condominium	5.00 DU
16	1837 12TH ST	Final	8-Unit Condominium	8.00 DU
17	1433 14TH ST	Under construction	Condominium	19.00 DU
18	1434 14TH ST	Approved	6-Unit Condominium	6.00 DU
19	1523 14TH ST	Final	Media Production	7.41 ksf
20	943 16TH ST	Final	5-Unit Condominium	5.00 DU
21	1803 16TH ST	Approved	11-Unit Condominium	11.00 DU
22	1807 17TH ST	Approved	Residential (5 condos/1 low income)	6.00 DU
23	1949 17TH ST	Approved	6 Unit Condominium	6.00 DU
24	1136 18TH ST	Under construction	3-Unit Condo	3.00 DU
25	1433 18TH ST	Under construction	Residential	6.00 DU
26	1753 18TH ST	Final	Senior Housing (affordable) FAME	18.00 DU
27	1347 19TH ST	Under construction	Mixed artist studio and Office	4.90 ksf
28	1959 20TH ST	Under construction	Residential	2.00 DU
29	1645 21ST ST	Final	Industrial	1.00 ksf
30	1236 25TH ST	Final	Residential	3.00 DU
31	2323 28TH ST	Approved	8-Unit Condominium	8.00 DU
32	401 BROADWAY	Approved	Mixed-use	60.10 ksf
33	525 BROADWAY	Final	Mixed-Use	134.00 ksf
34	2225 Broadway	Pending	Mixed-Use (15 unit residential)	15.00 DU
35	1450 Cloverfield	Pending	34-unit residential	34.00 DU
36	520 COLORADO AVE	Final	Affordable Housing (Step Up on Fifth)	34.00 DU
37	2834 COLORADO AVE	Under construction	Lionsgate/Post Production DA	180.00 ksf
38	2930 COLORADO AVE	Under construction	Village Trailer Park - mixed-use DA	391.14 ksf
39	315 COLORADO AVE	Final	SM Place Movie Theater	1,239.00 ksf
40	1171 FRANKLIN ST	Final	6-Unit Condominium	6.00 DU

No.	Site Address	Status	Project Type	Size (ksf or DU)
41	1750 10TH ST	Under construction	5-Unit Condominium	7.00 DU
42	702 ARIZONA AVE	Final	Mixed-Use	49.00 ksf
43	1541 FRANKLIN ST	Approved	Apartments	5.00 DU
44	1313 6TH ST	Pending	Mixed-Use DA	60.00 ksf
45	207 HOLLISTER AVE	Final	Residential/retail building	1.00 DU
46	612 LINCOLN BLVD	Final	4-Unit Townhomes	4.00 DU
47	1626 LINCOLN BLVD	Under construction	1626 Lincoln Boulevard Affordable Housing	64.00 DU
48	3204 LINCOLN BLVD	Approved	2-story commercial	2.64 ksf
49	2321 MAIN ST	Final	Retail/Office	2.90 ksf
50	2438 OCEAN PARK BLVD	Under construction	Residential	2.00 DU
51	2041 COLORADO AVE	Pending	Creative Office Addition	15.00 ksf
52	1127 PRINCETON ST	Final	3-Unit Condo	3.00 DU
53	1402 SANTA MONICA BLVD	Under construction	Mixed-Use DA (Mini)	33.75 ksf
54	2901 SANTA MONICA BLVD	Pending	Affordable Housing	60.00 DU
55	2200 VIRGINIA AVE	Final	Pico Branch Library	7.50 ksf
56	423 OCEAN AVE	Pending	423 Ocean Avenue	12.00 ksf
57	2300 WILSHIRE BLVD	Under construction	Mixed-Use Condos/Commercial	55.00 ksf/DU
58	710 WILSHIRE BLVD	Under construction	Mixed-Use Hotel	167.00 ksf
59	1319 YALE ST	Final	6-Unit Condominium	6.00 DU
60	1233 15TH ST	Final	Santa Monica UCLA Hospital	330.00 ksf
61	1707 OCEAN AVE	Final	Civic Center Specific Plan	253.00 ksf
62	1749 OCEAN AVE	Approved/Final	Civic Center Specific Plan	143.00 ksf
63	1685 MAIN ST	Approved	City Services Building	45.00 ksf
64	1554 5TH ST	Under construction	New Courtyard by Marriot DA	78.75 ksf
65	501 COLORADO AVE	Under construction	New Hampton Inn and Suites DA	78.75 ksf
66	1301 4TH ST	Pending	4th/Arizona	426.00 ksf
67	1423 5TH ST	Approved	Mixed-Use DA	71.50 ksf
68	1437 5TH ST	Approved	Mixed-Use affordable housing	57.30 ksf
69	1235 5TH ST	Pending	1235 5th Street	28.36 ksf
70	1211 12TH ST	Approved	15-Unit Condominium (Turtle Villas)	13.00 DU
71	2002 21ST ST	Pending	21-Unit Condominium/2020 Virginia	21.00 DU
72	603 ARIZONA AVE	Pending	Mixed-Use DA	28.63 ksf
73	500 BROADWAY	Approved	500 Broadway DA (Fred Segal) Site	327.20 ksf
74	501 BROADWAY	Pending	Mixed-Use (Performance Bicycles)	71.04 ksf
75	120 COLORADO AVE	Pending	Wyndam Hotel DA	174.73 ksf
76	525 COLORADO AVE	Pending	Mixed-Use DA	80.60 ksf
77	1431 COLORADO AVE	Pending	Mixed-Use DA	62.59 ksf
78	609 COLORADO AVE	Pending	Mixed-Use (Fritto misto)	71.75 ksf
79	1134 EUCLID ST	Pending	6-Unit Condominium	6.00 DU
80	1318 LINCOLN BLVD	Pending	Mixed-Use DA	62.60 ksf
81	1419 19TH ST	Pending	Medical Office	5.34 ksf

No.	Site Address	Status	Project Type	Size (ksf or DU)
82	1550 EUCLID ST	Pending	1550 Euclid Mixed-Use Retail/Office	34.28 ksf
83	1560 LINCOLN BLVD	Approved	Mixed-Use DA (Denny's site)	113.68 ksf
84	1601 LINCOLN BLVD	Approved	Mixed-Use DA (Norm's site)	100.69 ksf
85	1613 LINCOLN BLVD	Pending	Mixed-Use DA (Wertz Bros site)	64.56 ksf
86	1641 LINCOLN BLVD	Approved	Mixed-Use DA (Aarons brothers)	37.83 ksf
87	1637 LINCOLN BLVD	Pending	Mixed-Use (Joann's Fabric site)	84.33 ksf
88	1650 LINCOLN BLVD	Pending	Mixed-Use DA	80.68 ksf
89	1660 LINCOLN BLVD	Pending	Mixed-Use DA	75.50 ksf
90	2919 LINCOLN BLVD	Under construction	2919 Lincoln/802 Ashland	10.00 ksf
91	1133 OCEAN AVE	Pending	Miramar Hotel Revitalization Plan DA	506.72 ksf
92	234 PICO BLVD	Pending	Mixed-Use DA (bowling alley)	111.10 ksf
93	1122 PICO BLVD	Approved	Mixed-Use DA (rental housing)	32.00 DU
94	101 SANTA MONICA BLVD	Pending	Hotel/Mixed-Use DA (Ocean Avenue)	288.52 ksf
95	1802 SANTA MONICA BLVD	Pending	Mixed-Use	38.10 ksf
96	3008 SANTA MONICA BLVD	Under construction	Mixed-Use DA	32.20 ksf
97	3032 WILSHIRE BLVD	Pending	Mixed-Use DA	112.00 ksf
98	1248 5TH ST	Under construction	SM Post Office Adaptive Reuse	46.82 ksf
99	1681 26TH ST	Under construction	Creative Office (Old Papermate Site)	203.50 ksf
100	1665 APPIAN WAY	Pending	Mixed-Use DRP	43.00 ksf
101	1323 5TH ST	Pending	Mixed-Use DA	24.00 ksf
102	1342 5TH ST	Pending	Mixed-Use DA	51.00 ksf
103	1437 7TH ST	Pending	Mixed-Use DA	60.00 ksf
104	1543 7TH ST	Pending	Affordable Housing	62.00 DU
105	2903 LINCOLN BLVD	Pending	Mixed-Use DRP	93.00 ksf
106	3280 LINCOLN BLVD	Pending	Mixed-Use Building	4.00 ksf
107	3030 NEBRASKA AVE	Pending	Mixed-Use DRP	177.00 ksf
108	3025 Olympic BLVD	Pending	Mixed-Use DRP	172.00 ksf
109	1828 OCEAN AVENUE	Pending	Residential	83.00 DU
110	1921 OCEAN FRONT WALK	Pending	Residential	23.00 DU
111	1337 7TH ST	Approved	Fire Station #1	25.00 ksf
112	1242 20TH ST	Pending	1242 20th Street Wellness Center	95.50 ksf
City of Los Angeles Projects				
113	1905 ARMACOST AVE	New West Charter School	875.00	STUDENTS
114	11725 SUNSET BLVD	Archer School for Girls	518.00	STUDENTS
115	12101 OLYMPIC BLVD	Martin Expo Town Center Mixed-Use	516.00	DU
			67.00	KSF
			200.00	KSF
116	12001 SUNSET BLVD	Brentwood School	960.00	STUDENTS
117	11421 OLYMPIC BLVD	Mixed-Use	89.00	DU
			6.03	KSF

No.	Site Address	Status	Project Type	Size (ksf or DU)
118	320 SUNSET AVE	Bakery with Retail and Restaurant	6.00	KSF
119	1900 SAWTELLE BLVD	Mixed-Use Apartment and Restaurant	52.00	DU
			3.30	KSF
120	11750 WILSHIRE BLVD	Landmark Apartments and Mixed-Use	376.00	DU
			5.00	KSF
121	11800 SANTA MONICA BLVD	Mixed-Use	175.00	DU
			45.00	KSF
122	625 BARRINGTON AVE	New 46-Unit Apartment	46.00	DU
123	11355 OLYMPIC BLVD	Trident Center	120.24	KSF
124	11460 GATEWAY BLVD	Mixed-Use Apartment and Retail	128.00	DU
			5.15	KSF
125	12300 WILSHIRE BLVD	Medical Office	33.39	KSF
126	11750 SANTA MONICA BLVD	Buerge East	187.00	DU
127	12431 ROCHESTER AVE	New 5-Story 50-Unit Apartment	50.00	DU
128	12414 EXPOSITION BLVD	New Office Building	70.84	KSF
129	11660 SANTA MONICA BLVD	WLA Vons Supermarket	53.23	KSF
130	1466 WESTGATE AVE	Westside Family YMCA	65.00	KSF
131	11600 WILSHIRE BLVD	CLU from Office to Medical Office	120.87	KSF

SOURCE: Fehr & Peers, Providence St. John's Health Center Phase II Master Plan Transportation Impact Analysis, 2019.



SOURCE: OpenStreetMap, 2018; County of Los Angeles GIS

Providence Saint John's Health Center Phase II Project

Figure 3-1
Cumulative Projects Map

ESA

CHAPTER 4
Environmental Impact Analysis

4.1 Aesthetics

4.1.1 Introduction

This section of the EIR describes the existing aesthetic setting of the Project and evaluates the potential environmental effects of the Project related to scenic vistas, scenic resources, light and glare, shade/shadow, and consistency with the City's regulations and policies related to scenic quality. PRC Section 21099(d)(1) (as amended by Senate Bill (SB) 743) changes the way in which environmental impacts related to transportation and aesthetics are addressed in an EIR. Specifically, Section 21099(d)(1) of the Public Resources Code (PRC) states that a project's aesthetic impacts shall not be considered significant impacts on the environment if:

1. The project is a residential, mixed-use residential or employment center project, and
2. The project is located on an infill site within a transit priority area, which includes areas within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.

The Project meets the criteria set forth in PRC Section 21099(d)(1) because it: (1) is a high-employment use an infill site within an established urban area where all the Project boundaries either abut existing urban development or are separated by urban development only by an improved public right-of-way; and (2) the Project Site is within one-half mile of a major transit stop that includes four Santa Monica Big Blue Bus routes and one Los Angeles County Metro route, with stops along Santa Monica Boulevard and 20th Street. These bus stops are located within one and two blocks of all Phase II Development Sites for the Project. Additionally, the Site is located approximately 0.3 miles northeast of the 17th Street/Santa Monica College Metro Expo Station and 0.4 mile northwest of the 26th Street/Bergamot Metro Expo Station.

PRC Section 21099(d)(2)(A) modifies this exemption by stating that the regulation does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies. As an employment project located on an urban infill site within a transit priority area, the Project meets the exemption criteria set forth under Section 21099(d)(1) related to aesthetics.

Therefore, because the Project meets applicable criteria under PRC Section 21099(d)(1) as a transit oriented infill project, analysis of aesthetic impacts is not required by CEQA. Accordingly, the analysis of scenic vistas; light and glare; and shade, shadows, and solar access included herein is for informational purposes only in response to community concerns about aesthetics and to provide decision-makers and the general public a comprehensive review of the aesthetic changes that could occur under the Project Site.

4.1.2 Environmental Setting

4.1.2.1 Existing Conditions

Scenic Vistas

Examples of valued public views in the City include those of the Pacific Ocean, the Santa Monica Mountains, and urban scenic resources along major roadways. Views of the ocean and beaches are available from the western portion of the City, along the Pacific Coast Highway and Ocean Avenue, at the Santa Monica Pier, along Palisades Park, and along the walkways provided at the beaches north and south of the Santa Monica Pier. Although the City's General Plan does not identify scenic vistas, the City's Local Coastal Program (LCP) Land Use Plan describes public vistas located in the City. Specifically, scenic vistas have been identified from Santa Monica Pier, along Ocean Avenue, and along Ocean Front Walk. Due to distance and intervening topography, views of the ocean and beach are limited from the east to west corridors near the Project Site such as Santa Monica Boulevard, Broadway, and Arizona Avenue. Limited views of the Santa Monica Mountains to the north are available from north and south corridors such as 23rd Street and 20th Street adjacent to the Project Site. Therefore, there are no protected views or view corridors within the Project area and scenic views are limited to partially available views of the Santa Monica Mountains from public streets.

Scenic Quality/Visual Character

The City of Santa Monica offers a variety of unique natural and man-made visual resources that are visible to those walking, cycling, or driving through the City. These resources include well-known places such as the beachfront, historic areas, tree-lined neighborhoods, and vital commercial districts, such as the Third Street Promenade. The major natural resources unique to the City are the Santa Monica Bay, including the beachfront and coastal area, as well as the natural Palisades bluffs which overlook the coastline. The City is rich in architectural and cultural heritage, and contains a variety of building types and designs, representing a range of time periods and architectural styles and urban character.

The City is urbanized and built on a consistent street grid, creating generally 600-by-320-foot blocks. The consistent street grid allows many streets to have clear view corridors that allow distant views of tall buildings, the Pacific Ocean, and other landmarks. The Santa Monica Mountains, located to the north and northeast, are visible from many locations when looking north along existing roadways. Many of the streets in the City are tree-lined. The scale of the City can be described as compact, low-rise development, with moderate building heights and small parcel sizes. The City is characterized by steep elevation changes along the northwest coast and relatively flat areas throughout the remainder. The Project Site is located in a flat portion of the City.

The Providence Saint John's Health Center Campus (PSJHC) is located in the City's Healthcare Mixed-Use District; a district that includes the City's two hospitals (PSJHC and UCLA Medical Center, Santa Monica), as well as medical office buildings. The urban fabric surrounding the Campus contains a mixture of commercial and medical buildings on 20th Street, Arizona Avenue, Santa Monica Boulevard and Broadway and multi-family residential buildings on Arizona Avenue, 21st Street, and 23rd Street. The Project Site vicinity includes older residential structures ranging from one to eight stories (or up to 84 feet) in height, as well as newer hospital buildings (up to 92 feet in height), older commercial buildings ranging from one to twelve stories (up to 168 feet in height), two hotels (the Best Western Plus Gateway Hotel Santa Monica at 1920 Santa Monica Boulevard and the Ambrose at 1255 20th Street), two schools (McKinley Elementary School and Saint Anne School) and newer condominium buildings.

The characteristics of the Project Site and nearby uses from surrounding public streets is described below. Photographs of the Project Site and nearby uses are shown in **Figures 4.1-**1 through **4.1-3,** *Site Photographs*, and **Figure 4.1-4**, *Photographs of Nearby Uses on Adjacent Streets.*

Streetscapes Surrounding the Project Site

The Project Site is comprised of nine Phase II Development Sites that are located north and south of Santa Monica Boulevard (North Campus and South Campus of the PSJHC). The North Campus is generally bounded by Arizona Avenue to the north, 23rd Street to the east, Santa Monica Boulevard to the south, and 20th Street to the west. The South Campus is generally bounded by Santa Monica Boulevard to the north, 23rd Street to the east, Broadway to the south, and 20th Street to the west. The visual character of these streetscapes is described below.

Santa Monica Boulevard

The Santa Monica Boulevard corridor begins at Centinela Avenue on the eastern edge of the City and extends west to Lincoln Boulevard, where it transitions to the downtown area. Santa Monica Boulevard accommodates a wide variety of uses over its twenty-nine-block length, and, as a major boulevard, caters to both local and regional users. The portion of Santa Monica Boulevard between 20th Street and 23rd Street is dominated by PSJHC and related medical facilities and offices ranging from two stories to 12 stories and several surface parking lots serving the medical uses (See Photograph 10 in Figure 4.1.4). Tall street trees border each side of Santa Monica Boulevard. Bordering the medical use to the north and south, are smaller one-and two-story commercial uses that include restaurant and retail uses as well as the three-to-four story Best Western hotel located at the southeast corner of Santa Monica Boulevard and 20th Street. This portion of Santa Monica Boulevard that fronts the Project Site tends to be highly auto focused with limited storefront retail and other active ground floor office uses and does not have high level of pedestrian amenities. At the corner of Santa Monica Boulevard and 23rd Street, is a one-story brick commercial building located at 2301 Santa Monica Boulevard which includes brown awnings and brick planters (see Photograph 12 in Figure 4.1-4). This structure is listed a local historic resource as an example of the Vernacular Commercial Style. North of this building at 2401 Santa Monica Boulevard, is the McKinley Elementary School which is also a local historic resource and noted as an example of the Spanish Colonial Revival Style and for its historical significance to the Santa Monica Public School history.

PHOTOGRAPH 1: View of the semi-circular driveway, Mullin Plaza and the west wing of the PSJHC.

PHOTOGRAPH 2: View of the parking lot and office building on Site 2D/E from Santa Monica Boulevard.

PHOTOGRAPH 3: View of the temporary MRI buildings on Site S3 from Santa Monica Boulevard looking south.

PHOTOGRAPH 4: View of 20th Street looking north of the Child & Family Development Center on Site 2I.

D170258.00

SOURCE: ESA, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.1-1
Site Photographs

ESA

PHOTOGRAPH 5: View of the John Wayne Cancer Institute on Site S4 from Santa Monica Boulevard looking south.

PHOTOGRAPH 6: View of Site S1 from Broadway looking east.

PHOTOGRAPH 7: View of vacant apartment building on Site S4 from 21st Street looking east.

D170258.00

SOURCE: ESA, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.1-2
Site Photographs

ESA

PHOTOGRAPH 8: View of Site S3 from 21st Street looking west.

PHOTOGRAPH 9: View of 23rd Street facing north near the intersection of Santa Monica Boulevard. Visible on the left is the office building on Site 2D/E.

D170258.00

SOURCE: ESA, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.1-3
Site Photographs

ESA

PHOTOGRAPH 10: View of Santa Monica Boulevard looking east from 20th Street.

PHOTOGRAPH 11: View of historic building formally occupied by Kingley Gates Mortuary at 1925 Arizona Avenue at the corner of 20th Street and Arizona Avenue looking northwest.

PHOTOGRAPH 12: View of the intersection of Santa Monica Boulevard and 23rst Street looking east. Historic building 2301 Santa Monica Boulevard is visible on the left.

PHOTOGRAPH 13: View of Arizona Avenue looking west. Visible on the right is the historic Santa Monica Doctors Office Building on the north side of Arizona Avenue.

D170258.00

SOURCE: ESA, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.1-4
Photographs of NearbyUses on Adjacent Streets

ESA

Arizona Avenue

Although the Project Site does not front Arizona Avenue, two notable historic resources are located along Arizona Avenue within proximity of the Project Site. Located at 1925 Arizona Avenue (formally occupied by Kingley Gates Mortuary) is identified in the City's Historic Resources Inventory and is designed in a Tudor Revival architectural style. Located at 2125 Arizona Avenue (Santa Monica Doctors Office Building) is a locally listed historic resource style noted as an example of the Streamline Moderne Style as applied to a professional business (see Photographs 9, 11, and 13 in Figures 4.1-3 and 4.1-4). Most of the other land use along the northern side Arizona Avenue between 20th Street and 23rd Street are a mixture of mid-20th century multi-family residential apartments fronted by lawns and landscaping and small craftsman style single-family homes that include front porches with minimal front yards. A boutique craftsman style hotel (the Ambrose) is located at the northeast corner of Arizona and 20th Street (1255 20th Street) and a modern four story adult convalescent home is located at 2021 Arizona Avenue.

The south side of Arizona Avenue is characterized by facilities associated with PSJHC facilities including parking structures and surface parking, the emergency medical services entrance, and utilities and mechanical services set behind low lying landscaping. The north lawn area located along Arizona Avenue near the corner of 23rd Street is an open space area known as the North Lawn. This expansive open space area is accessible to the public and is set behind a perimeter hedge and includes landscaping and winding pedestrian pathways.

Broadway

Broadway, a major mixed-use commercial corridor is situated at the center of Santa Monica's geographic boundaries and runs east-west from Centinela Avenue at the City's eastern limits to Lincoln Boulevard, where it enters downtown Santa Monica. The south side of Broadway from 20th Street to 23rd Street, is dominated by one-to two-story commercial, medical office and creative office uses. These buildings typically have flat, non-ornate facades with little to no setbacks from the sidewalk and with the exception of street trees, landscaping is minimal.

20th Street

20th Street travels north to south in Santa Monica that extends from San Vicente Boulevard to Ocean Park Boulevard. In the Project Area, development along 20th Street is characterized by medium and high rise buildings associated with PSJHC and related medical facilities and offices as well as lower density one-to-three story residential buildings (see Photograph 4 in Figure 4.1-1).

21st Street

21st Street from Santa Monica Boulevard and Broadway is a one lane, one-way street that includes sidewalks and mature street trees. Outside of the Project Site, along 21st Street north of Broadway, is a vacant two-story residential apartment building that is set behind a metal fence, two one-story bungalow style apartment buildings set behind a green lawn and landscaping, and an eight-story senior housing building called Geneva Plaza set behind mature trees and landscaping.

23rd Street

23rd Street runs north to south in Santa Monica from San Vicente Boulevard to Santa Monica Boulevard. In the Project Area, 23rd Street is characterized by residential uses on the east side of

the Street that include a mixture of small craftsman style single-family homes and two to three story multi-family residential apartments. The west side of 23rd Street contains PSJHC facilities and an expansive open space area that includes landscaping includes grass, mature trees, flowers, and a winding pedestrian pathways (see Photograph 9 in Figure 4.1-3).

Project Site Visual Characteristics

The Campus is located on both the north and south sides of Santa Monica Boulevard. Overall, the Phase II Development Sites have a total land area of approximately 407,100 square feet. As described in more detail below, Sites 2C, Sites 2D/E, and 2I are located on the North Campus and are located north of Santa Monica Boulevard. Development Sites S1, S2, S3, S4, and S5 are within the South Campus and are located south of Santa Monica Boulevard.

Site 2C

Site 2C is located on the North Campus along Santa Monica Boulevard. This area is currently developed with a surface parking lot (the West Lot), adjacent to Mullin Plaza. The perimeter of the parking lot is fronted with trees and a landscaped grass median and a number of trees are interspersed in the surface parking lot Although the landscaping and vegetation assists in screening views of the parking lot and vehicles, Site 2C has low visual quality.

Mullin Plaza

Mullin Plaza is located between Sites 2C and 2D/E on the North Campus (see Photograph 1 in Figure 4.1-1). Completed in 2013, Mullin Plaza serves as a prominent formal entrance to PSJHC main building. Mullin Plaza includes a one-way semi-circle driveway with the ingress driveway from Santa Monica Boulevard on the east and the egress driveway to Santa Monica Boulevard on the west. Within the semicircular driveway, there is approximately 17,700 sf of open space which includes tall Mexican feather grass along with Chinese Elms, Canary Island pines, ginkgo trees, peppermint willows and other drought-tolerant plants. Additionally, there is a hedge maze along the front of the building that leads into the Gloria and Jimmy Steward Rose Garden.

Adjacent to the sidewalk along Santa Monica Boulevard is a pedestrian pathway framed by small landscaped “mounds” and perimeter trees. Visible beyond Mullin Plaza to the north, is the main façade of the Phase I Howard Keck Building that includes a distinctive sweeping arc-shaped façade that incorporates a prominent cross inlaid within horizontal ribbons of glass and concrete. Overall, Mullin Plaza is considered to have a high-level of visual quality relative to the surrounding urban uses.

Site 2D/E

Site 2D/E on the North Campus is developed with a surface parking lot (Lot C) and a one to two-story concrete office building (the PSJHC Foundation building) located at the corner of Santa Monica Boulevard and 23rd Street (2221 Santa Monica Boulevard). To the south of the office building, partially fronting Santa Monica Boulevard, is a small plaza/siting area with seating covered by an orange trellis. The main facade of the office building fronting Santa Monica is lined with a decorative “green wall” vertical planting system (see Photograph 2 in Figure 4.1-1). The office façade that fronts 23rd Street has minimal landscaping and a largely blank façade. South of the building, is the main vehicle entrance to the associated surface parking lot. Site 2D/E has a

moderate level of existing visual quality but does not contain any significant or unique features relative to the surrounding urban use.

Site 2I

On the North Campus, Site 2I is currently developed with the Child & Family Development Center, which consists of a two-story commercial building with a flat roof. The building features characteristics of the Modern style (see Photograph 4 in Figure 4.1-1). The façade features a central entrance with concrete steps, a ramp, metal railings and double glass doors. The building is set back five feet from the lot line along 20th Street and is fronted with minimal vegetation consisting of low lying hedges, trees and planters. The rear of the building northeast elevation features a playground area for the classrooms, which is enclosed by a painted cinderblock fence lined with vegetation. As noted in Section 4.4. *Historic Resources*, the Child & Family Development Center is eligible as a historical resource due to its association with the development of medical facilities in the Mid-City neighborhood, the productive life of Dr. Evis Coda, as an example of work by master architect John W. Maloney, and excellent example of a Mid-Century Modern style medical office building.

Sites S1 & S3

Sites S1 and S3 are currently improved with surface parking lots containing capacity for 139 (Lot B) and 145 (Lot I) vehicles, respectively.

On the South Campus, fronting Site S3 along Santa Monica Boulevard south of 21st Street, are two temporary MRI modular buildings that were constructed during PSJHC Phase I. Site S3 has relatively low visual quality as a portion of these buildings are set back from the street behind green metal fencing. The façades of the temporary buildings do not contain windows or architectural elements and various mechanical and utility equipment faces the street front. A surface parking lot is located to the west of the buildings set behind a low level concrete block fence.

Site S2

Site S2 is developed with a portion of a surface parking lot (Lot H) that is used by PSJHC. The frontage of Site S2 contain minimal landscaping and views of the surface parking lot and vehicles are set behind metal fencing. Site S2 has relatively low visual quality.

Site S4

Fronting Santa Monica Boulevard on the South Campus, within Site S4, is the two-story brick and concrete John Wayne Cancer Institute Building located at 2200 Santa Monica Boulevard (see Photograph 3 in Figure 4.1-1). Designed in a Mid-Century Modern style, the building features horizontal massing, geometric elements, large glazing, and a flat roof. The building is set back between 13 feet and 32 feet from Santa Monica Boulevard. Within the setback fronting the sidewalk is an inset-entrance and courtyard and large brick lined planters that contain flowers, low lying vegetation, and trees. As noted in Section 4.4. *Historic Resources,* the John Wayne Cancer Institute is eligible as a historical resource due to its associations with the development of medical facilities in the Mid-City neighborhood, the productive life of prominent psychiatrist Dr. Jerome Kummer, as an example of work by master architect Weldon J. Fulton, and as an excellent example of a mid-20th century medical facility.

Site S5

Located on the South Campus, Site S5 is currently used as a surface parking lot (a portion of Lot H) by PSJHC. Views of Site S1's surface parking and associated vehicles are minimally screened by small trees and a small perimeter planter. Site S1 has relatively low visual quality.

Light and Glare

The Project Site is located in an urban area that includes numerous sources of nighttime lighting, including streetlights on Santa Monica Boulevard, Broadway, Arizona Avenue, 20th Street, 21st, and 23rd Street. Other sources of light within the vicinity of the Project Site include vehicle lights, pole-mounted street lights, and surface parking lots. Hospital and medical office uses which encompass the Project Site, also include light sources from interior lighting and exterior lighting for surface parking, pedestrian safety, security, landscaping, and signage. Interior light from windows of nearby hotel, commercial, and residential uses also contributes to ambient nighttime light levels in the area. Given the nature of the existing medical uses on the Project Site, there is 24-hour activity and lighting that is visible throughout the night.

Some land uses are considered "light-sensitive receptors," including residences, hotels, and convalescent homes, since these uses are typically occupied by persons who have expectations for privacy during evening hours and are subject to disturbance by bright sources of light. In the vicinity of the Project Site such sensitive receptors include Berkley East Convalescent Hospital, several small apartment buildings and single-family residences along Arizona Avenue, several small apartment buildings and single-family residential uses along 23rd Street, a small apartment building and a senior housing development on the eastside on the east side of 21st Street, as well as residential and supportive medical housing (e.g., convalescent homes) along 20th Street (see Figure 4.13-2 for illustration showing nearby sensitive receptors to the Project Site on an aerial photograph).

Shading

The Project Site is located in an urban area surrounded by mid-rise and high rise office and medical office, low-rise commercial, and one to four story residential buildings that creates a varying pattern of shadows that rotate in a sweeping arc toward the west, north, and east, according to the movement of the sun.

Facilities and operations considered sensitive to the effects of shading include solar collectors; nurseries; residential uses; primarily outdoor-oriented retail uses (e.g., certain restaurants); or routinely useable outdoor spaces associated with recreational, institutional (e.g., schools), or residential land uses. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Shade sensitive uses in the Project vicinity include Berkley East Convalescent Hospital, several small apartment buildings and single-family residences along Arizona Avenue, several small apartment buildings and single-family residential uses along 23rd Street, a small apartment building and a senior housing development on the eastside on the east side of 21st Street, as well as residential uses and supportive medical housing (e.g., convalescent homes) along 20th Street (see Figure 4.13-2). In addition, McKinley Elementary School located on Santa Monica Boulevard approximately one block to the east is considered a sensitive use.

4.1.3 Regulatory Framework

4.1.3.1 State

Senate Bill No. 743

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under CEQA for several categories of development projects including the development of infill projects in transit priority areas. The bill adds to the CEQA Statute, California Public Resources Code Chapter 2.7, Modernization of Transportation Analysis for Transit-Oriented Infill Projects, Section 21099. Pursuant to Section 21099(d)(1) "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." The provisions of SB 743 apply to projects located on a "… lot within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses….and it is located within one-half mile of a major transit stop." As discussed in the Introduction to this Section, the Projects would meet the criteria set forth in SB 743 because the Project is (1) located within a transit priority area within a one-half mile of a major transit stop and (2) is a high-employment use on an infill site within an established urban area. Under SB 743, the Project is exempt from findings of significance related to aesthetic effects, including scenic vistas, scenic resources, visual quality, light and glare, and shade impacts. For the purpose of this EIR, aesthetic effects are voluntarily disclosed for informational purposes only.

4.1.3.2 City of Santa Monica

Santa Monica Municipal Code

Zoning Ordinance

The City addresses visual character of development in many City documents, including the Santa Monica Municipal Code (SMMC). Specifically, Divisions 1 through 5 of Article 9 of the SMMC, comprises the City of Santa Monica Zoning Ordinance. The City's Zoning Ordinance sets forth specific design guidelines, height limits, building density, building design and landscaping standards, architectural features, sign regulations, and open space and setback requirements. For the project, the development and design of new buildings are governed by the Development Agreement between Providence Saint John's and the City. Refer to Section 4.11, Land Use and Planning.

As required by Chapter 9.55, Architectural Review Board design approval is required for new construction, additions or remodel of an existing building, in all zones except R1. Single family homes in all zones, with the reception of the R2R zone, are similarly exempt from architectural review.

The Zoning Ordinance includes regulations pertaining to light and glare. Specifically, SMMC Section 9.21.080 (shielding/glare) requires that all lighting fixtures shall be shielded as to not produce obtrusive glare onto the public right-of-way or adjacent properties. All luminaries shall meet the most recently adopted criteria of the Illuminating Engineering Society of North American

for "Cut Off" or Full Cut Off" luminaries." Further, requires that (for light trespass) that lighting may not illuminate other properties in excess of a measurement of 0.5-foot candles of light."

> *(Light Trespass): "Lighting may not illuminate other properties in excess of a measurement of 0.5-foot candles of light. All outdoor lighting associated with commercial uses shall be shielded and directed away from surrounding residential uses. Such lighting shall not exceed 0.5 foot-candles of illumination beyond the property containing the commercial use and shall not blink, flash, oscillate, or be of unusually high intensity of brightness, with the exception of amusement rides located on the Pier, which may have lights that blink, flash, and oscillate."*

Section 9.21.120 also prohibits the use of highly reflective materials and limits glare effects.

> *(Reflective Materials): "No more than 25 percent of the surface area of any façade on any new building contain black or mirrored glass or other mirror-like material that is highly reflective, and that materials for roofing be of a non-reflective nature.*

(Glare): "Direct glare must not be visible beyond the boundaries of a Proposed project's property line." In addition, tree protection and maintenance measures are provided in Chapter 7.40, which constitutes the City's Tree Code:

Tree Code

Chapter 7.40 of the SMMC establishes protections of public trees within the City right of way. Specifically, Section 7.40.110 of the SMMC states that:

> *"no person shall remove, cut, trim, prune, plant, or interfere with any tree, shrub, or plant upon any public street, sidewalk, parkway, alley, or other public property without having first obtained a City permit authorizing such work. The permit may be granted on the condition that the owner or authorized representative bears the cost of the permitted work and on the condition that the owner or authorized representative bears the cost of replanting any tree, shrub, or plant."*

Section 7.40.160 of the SMMC requires that:

> *"during the erection, repair, alteration or removal of any building, house, or structure in the City, any person in charge of such work shall protect any tree, shrub or plant in any street, sidewalk, parkway, alley or other public property within the City in the vicinity of such building or structure with sufficient guards or protectors as to prevent injury to the tree, shrub or plant arising out of or by reason of said erection, repair, alteration or removal.*

City of Santa Monica Architectural Review Board

As stated, chapter 9.55 established the ARB design review procedures for new is new construction, additions or remodel of an existing building, in all zones except R1. The mission of the ARB is to "preserve existing areas of natural beauty, cultural importance and assure that buildings, structures, signs or other developments are in good taste, good design, harmonious with surrounding developments, and in general contribute to the preservation of Santa Monica's reputation as a place of beauty, spaciousness and quality." The ARB design review process is intended to prevent or

minimized degradation of visual character within the City, and occurs after a project has received its entitlement (i.e., approval).

City of Santa Monica Urban Forest Master Plan

The trees in any public street or public place in Santa Monica are collectively referred to as a Community Forest and are managed by the City Public Landscape Division. The City's Urban Forest Management Plan (UFMP) includes objectives to enhance the urban forest, promote conservation of tree resources, maintain trees in a healthy condition, ensure optimum tree planting, and public education. City Public Landscape staff review and field check construction plans for street tree code requirements to ensure protection of street trees and review and field check landscape plans as well. The UFMP states that the best option for existing public trees is to retain them in their existing locations. However, relocation and/or replacement of public trees may be considered as part of new city public improvement projects. All tree removals, relocations, and plantings within public right of way are subject to review and approval by the City upon completion of each project's community design and commission review process.

Santa Monica Land Use and Circulation Element (LUCE)

The Project Site is located in the Healthcare Mixed-Use (Healthcare) District, which is a land use designation within the broader Employment and Commerce designation. The Healthcare District includes the PSJHC, the Santa Monica-UCLA Medical Center (SM-UCLA), and the area immediately around and between these facilities. The vision for the Healthcare Mixed-Use area is to continue to support the changing healthcare needs of the community and the continued viability of the two hospitals in the City. New medical and ancillary facilities, open spaces and additional community benefits are envisioned to emerge over time.

Many goals and policies within the LUCE relate to aesthetics, visual character, and visual quality. The most pertinent goals and policies are provided below. The issues raised in these policies such as character and appearance of buildings and effects on view corridors, including a discussion of impacts regarding view corridors identified in the LUP, are topics discussed in the analysis below. Consistency of the Project with LUCE goals and policies more broadly focused on land use are analyzed in Section 4.11, *Land Use and Planning,* of this EIR. As discussed in Section 4.11, the design of the Project is consistent with the provisions of the LUCE and Zoning Ordinance. Pertinent goals and policies include the following:

City-wide Design Goals and Policies

> **Goal LU15:** Enhance Santa Monica's Urban Form – Encourage well-developed design that is compatible with the neighborhoods, responds to the surrounding context, and creates a comfortable pedestrian environment.
>
> > **Policy LU 15.3:** Context-Sensitive Design. Require site and building design that is context sensitive and contributes to the City's rich urban character.
> >
> > **Policy LU 15.4:** Open and Inviting Development. Encourage new development to be open and inviting with visual and physical permeability, connections to the existing street and pedestrian network, and connections to the neighborhoods and the broader community.

Policy LU 15.5: Pedestrian and Bicycle Connectivity. Encourage the design of sites and buildings to facilitate easy pedestrian- and bicycle-oriented connections and to minimize the separation created by parking lots and driveways.

Policy LU 15.7: Street–Level Pedestrian-Oriented Design. Buildings in the mixed-use and commercial areas should generally be located at the back of the sidewalk or the property line (street front) and include active commercial uses on the ground floor. Where a residential use occupies the ground floor, it should be set back from the property line, be located one-half level above the street or incorporate design features to provide privacy for the unit. Front doors, porches and stoops are encouraged as part of orienting residential units to the street.

Policy LU 15.8: Building Articulation. Building façades should be well designed with appropriate articulation in the form of setbacks, offsets, projections and a mix of architectural materials and elements to establish an aesthetically pleasing pattern. Large areas of glass above the ground floor require special design consideration. Highly reflective materials are to be avoided, and dark or reflective glass is prohibited.

Policy LU 15.9: Pedestrian-Oriented Design. Buildings should incorporate pedestrian-scaled elements with durable, quality materials and detailing located on the lower stories adjacent to the pedestrian.

Policy LU 15.10: Roofline Variation. Buildings should be designed with a variety of heights and shapes to create visual interest while maintaining a generally consistent overall street front. To achieve this goal, development standards should provide flexibility to encourage buildings with interesting silhouettes and skylines, and the primary building façade shall not be lower than the designated minimum street façade height.

Policy LU15.11: Building Façades and Step Backs. Buildings should generally conform to the minimum and maximum requirements for the street façade height established for their designated area. Portions of a building façade higher than the street frontage, 35 feet for most mixed-use areas, shall step back from the façade of the floor below in a manner that will minimize the visual bulk of the overall building as viewed from the public sidewalks and roadway and ensure maximum light, air and sense of openness for the general public. Guidelines or standards for the building mass above the street wall shall be established in the zoning ordinance.

Policy LU15.12: Buildings should have their primary façades located at the back side of the sidewalk or on the property line. However, to encourage a well-landscaped streetscape with places for people to gather, small landscaped, people-gathering spaces are encouraged where they will attract people without interrupting the pedestrian retail experience. The intent is to have an overall ground coverage of 80 percent on each block.

Specific Goals and Policies Pertaining to the Healthcare District

Policy D28.8: Encourage the development of a comfortable landscaped pedestrian environment including plazas and usable landscaped open spaces with all major renovations to hospital facilities

Goal 30: Ensure that new and remodeled buildings in the Healthcare District are compatible in scale and character with existing buildings and the surrounding residential neighborhood.

Policy D30.1: Encourage the primary facades of buildings to face the street with the building face located on the property line or back side of the sidewalk along sidewalks or pedestrian ways. However, to encourage a lively streetscape with places for people to socialize, small landscaped gathering spaces and plazas are encouraged.

Policy D30.2: Scale buildings to the pedestrian to create an intimate sidewalk experience. Incorporate enhanced materials and detailing in ground floor facades where they will be in close proximity to passing pedestrians.

Policy D30.3: Design buildings with a variety of heights, architectural elements and shapes to create visual interest along the street. Incorporate meaningful combinations of materials and three-dimensional articulation to create shadow patterns to engage the eye.

Policy D30.4: Avoid buildings with uniformly flat roofs or cornices in order to create an interesting skyline.

Policy D30.5: Establish a prescribed building envelope with stepbacks designed to maintain access to light and air where new healthcare or commercial use are located adjacent to the existing residential.

Policy D30.6: Encourage active retail and other ground floor uses with pedestrian interest to incorporate generally continuous, transparent non-tented display windows facing the sidewalk.

Policy D30.7: Encourage mixed-use developments to have active ground floor uses that face the boulevard with residential or office uses located on the upper floors.

Policy D.30.8: Discourage offices and other limited pedestrian access uses on the ground floor facing the street or pedestrian ways.

Policy D30.9: Encourage sidewalk dining where it meets established criteria.

Hospital Area Specific Plan

The Hospital Area Specific Plan (HASP) was adopted in 1988 and revised in 1993 and 1998. The HASP includes the PSJHC, SM-UCLA, and surrounding neighborhoods and is generally bordered by Wilshire Boulevard to the north, Euclid Avenue to the west, Broadway to the south, and Chelsea Avenue to the east.

The intent of the HASP is to address issues of neighborhood concern, address the needs of modern hospitals in a competitive health care environment, to develop basic zoning and development standards, to identify parcels for rezoning, and to identify other programs which should be implemented in the area.

The HASP includes the following objectives related to aesthetics, visual character, and visual quality that are applicable to the Project:

- **Objective Number 5:** Establish development guidelines for the area which will serve as a transition between development standards on Wilshire and on Santa Monica Boulevards.
- **Objective Number 7:** Encourage the use of architectural materials and design which will be compatible with surrounding uses in the hospital area.

- **Objective Number 28:** Promote quality housing and neighborhoods.
- **Objective Number 74:** Encourage architecturally attractive structures and the liberal use of landscaping along the Arizona Avenue bikeway.

Conservation Element

The City of Santa Monica's Conservation General Plan Element, adopted in 1975, provides for protection and enhancement of the City of Santa Monica's scenic and aesthetic resources. It addresses the protection of the City's natural resources including the ocean, beach and bluffs as visual resources. This element of the General Plan was included to serve as input to the Land Use and Circulation Elements of the General Plan. The goals and objectives are reflected in more detail in the 2010 LUCE as discussed above.

Scenic Corridors Element

The Scenic Corridors Element was adopted by the City Council in 1975. The purpose of the Scenic Corridors Element is to protect and enhance the scenic resources of the City of Santa Monica, by establishing a system of scenic corridors along existing roadways that traverse areas of scenic beauty and interest. The goals of the Scenic Corridors Element require policies that provide for the beautification of thoroughfares that lend themselves to landscaping, pleasing architectural treatments, and the development of scenic corridors for the use of pedestrians and bicyclists. Scenic corridors include the visible land area outside the roadway right-of-way and generally described as "the view from the road." The Scenic Corridors Element designates the following scenic corridors: Santa Monica Freeway from City boundary to PCH; PCH from City northern boundary to southern boundary; Ocean Avenue from City boundary to Barnard Way; Barnard Way from Ocean Avenue to Santa Monica City boundary; Wilshire Boulevard from City boundary to Ocean Avenue; Santa Monica Municipal Pier; and Third Street Promenade are designated as scenic corridors. The scenic corridor nearest to the project site is the Third Street Promenade, located approximately 200 feet west of the project site.

4.1.4 Environmental Impacts

4.1.4.1 Thresholds of Significance

Pursuant to PRC Section 21099(d)(1), aesthetic impacts of the Project related to scenic vistas, scenic resources, light and glare, and shade/shadow are considered less than significant since the Project is an employment project located in a transit priority area. As such, analysis of such impacts is not required by CEQA. Nonetheless, this analysis of scenic vistas, scenic resources, light and glare, and shade/shadow is included for informational purposes only, in order to provide information to the public and the decision makers regarding the appearance of the Project and its effect on the aesthetic settings in which it is located. Additionally, a discussion of consistency with zoning and regulations governing scenic quality is provided.

Appendix G of the State CEQA Guidelines provides questions that address potential impacts related to aesthetics. These questions are listed below and are analyzed in this section:

Except as provided in Public Resources Code 21099, would the project:

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

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

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

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

In addition to these questions raised in Appendix G, the following question is also addressed.

Would the project:

e) Create shading effects that would interfere with the use of outdoor open space or solar accessibility?

4.1.4.2 Methodology

Scenic Vistas

The evaluation of scenic vistas pertains to the degree and nature of change to the surroundings as a result of the Project. The existing visual quality of the Project Site and the Project area are compared to expected (future) conditions to determine whether the views of the area would be substantially degraded. Factors such as changes in the appearance of the Project Site, building heights, massing, setbacks, landscape buffers and other features are taken into account in determining the changes in the view field or blockages of scenic vistas. The analysis of scenic vistas is also based in part on the evaluation of simulated composite photographs showing existing and future conditions.

Scenic Resources within a Scenic Highway

The scenic resources analysis typically applies to the proximity of a project to view field along a state scenic highway. The analysis also applies to the determination of whether any natural scenic resources, such as certain specimen trees, outcroppings and other natural features, as well as historic scenic resources are present within a site. The latter includes historic buildings such as those that exhibit a defined architectural character or design component or a particular historical context such as those listed as City of Santa Monica Landmarks. Unlike the focus of Section 4.4, *Historic Resources,* of this EIR, in which the impact analysis is concerned with the effects on character-defining components that contribute to a historic resource's eligibility for local, state, or national listing, the analysis of scenic resources is concerned whether the historic resource would be materially damaged or changed to the degree that its aesthetic benefits are removed. The analysis is based largely on Section 4.4 and on the Cultural Resources Report included as Appendix C of this EIR.

Consistency with Regulations and Policies that Govern Scenic Quality

The evaluation of applicable zoning regulations and policies that govern scenic quality is achieved through a side by side comparison of the Project with applicable aesthetics policies contained in the City of Santa Monica Municipal Code, the Urban Forest Master Plan, the Land Use and Circulation Element (LUCE) of the Santa Monica General Plan, and the Hospital Area Specific Plan. Based on the side-by-side comparisons, it is determined whether the Project would be substantially consistent with the objectives of these regulatory plans and whether additional mitigation measures would be required. The Project is not compared to the Conservation Element since the objectives of that Element are reflected in the Land Use and Circulation Element. It is also not compared to the objectives of the Scenic Corridor Element since it is not located adjacent to a designated scenic corridor. In relation to the nearest scenic corridor, the Third Street Promenade, consistency with the scenic quality objectives of the Land Use and Circulation Element and the Hospital Area Specific Plan, as well as the architectural review required under the Municipal Code would ensure that it would not result in a secondary effect on this resource.

Light and Glare

The analysis of light and glare identifies the location of light-sensitive land uses and describes the existing ambient conditions on the Project Site and in the Project vicinity. The analysis describes the Project's proposed light sources, and the extent to which lighting, including illuminated signage, could affect light-sensitive uses. The analysis also considers the potential for sunlight to reflect off building surfaces (glare) and the extent to which such glare would adversely affect views.

Shading

The consequences of shadows on land uses can be positive, including cooling effects during hot weather, or negative, such as loss of warmth during cooler weather and loss of natural light for landscaping, solar collection, and human activity. While some incidental shading on shadow sensitive uses is commonly acceptable, shading that occurs over extended periods of time can be considered a detriment. In determining shadow effects, several factors are considered:

- Affected land use (i.e., is it a shadow-sensitive use whereby sunlight is essential to its use);
- Duration (i.e., how many hours per day might a use be shadowed);
- Time of day (i.e., is it in shadow at a time of day when sunlight is most important);
- Season (i.e., what time of year might a particular use be in shadow);
- Extent (i.e., what percentage of a particular use may be in shadow);
- Nature of the shadows (i.e., is the shadow more solid or more dappled in nature); and
- Pre-existing conditions (i.e., are there existing buildings, landscaping or other features that currently shadow the use).

The shade/shadow analysis considers the potential for shadow-sensitive uses to be placed in shadow by the Project. Shade sensitive uses are those uses where sunlight is important to function, physical comfort and/or commerce such as routinely usable outdoor spaces associated with residential development, recreational or institutional uses (i.e., hospitals), commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar

collectors.[1] Uses may be considered sensitive to shade and shadow effects if they require or are otherwise dependent on sunlight for regular function, comfort, or commerce.

Shadow simulations were prepared for the Project by identifying the maximum height of the proposed buildings, conservatively applying the maximum footprint of the buildings (location, shape and size) for each site; and then calculating and diagramming the shadows that would be cast by the buildings. The evaluation focuses on the hours when sun accessibility is the greatest and of most use to the public. These hours include: the winter solstice between 9:00 a.m. and 3:00 p.m. Pacific Standard Time (PST) and on the spring equinox, summer solstice, and fall equinox between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (PDT). The shading effects that would occur during these times are portrayed on shading diagrams that show the shading patterns adjacent to shade sensitive uses and the hours that shading on such uses would occur.

4.1.4.3 Project Characteristics and Project Design Features

Architectural Style and Massing

As shown in **Figures 4.1-5** through **4.1-13**, the specific architectural style and design for the individual buildings developed as part of the Project have not yet been determined, however, their design would be informed by the surrounding environment and context and the health care and related programs within the buildings. The Project's components are anticipated to range in height from approximately 17 feet (the Mullin Plaza and Saint John's cafés) up to 105 feet for the Education and Conference Center. The approximate building heights and heights of existing surrounding buildings are summarized in **Table 4.1-1**, *Summary of the Project's Building Heights*, below.

The Phase II Project buildings adjacent to Santa Monica Boulevard are envisioned to be reflective and harmonious with PSJHCs' other existing and proposed buildings along Santa Monica Boulevard to create a unified Campus while enhancing the pedestrian-realm with new landscaping, open spaces and active ground floor uses. The portion of the new buildings adjacent to Broadway and 21st Street would be improved through the addition of open space and buildings with a strong street presence that have distinctly different architectural language in response to their non-medical context. Buildings along 20th Street would be of a contemporary design that would add visual interest while activating the street.

Open Space

An important design component of the Project is to create well-defined, welcoming open spaces that enhance the pedestrian experience. The new open spaces created by the Project would serve to strengthen the sense of a unified Campus by creating multiple connections between north and south open spaces. Planned open space areas include Saint John's Square on the South Campus and the redesigned and expanded Mullin Plaza on the North Campus. These center open space areas are envisioned as the heart of the overall Campus. Several garden areas are also planned and include

[1] Shadow-sensitive uses for this analysis are defined based on the City of Santa Monica's Land Use and Circulation Element Final Environmental Impact Report, June 2010.

the South Garden, Sun Garden, and Woodland (tentative name) Garden, an as well as open space associated with new multi-family housing on Site S2.

TABLE 4.1-1
SUMMARY OF THE PROJECT'S BUILDING HEIGHTS

Site	Phase II Component	Building Height	Existing Tall Buildings in the Component Area
S1	Child & Family Development Center	47 feet	Existing 70-foot tall Verizon Building to the west, existing 84-foot tall residential structure to the east.
S2	Multifamily Housing	36 feet	Existing 42-foot-tall residential building to the north, existing and one- and two-story commercial and residential uses along Broadway
S3	West Ambulatory Care & Research Building	89 feet	Existing 110-foot-tall medical office building to the west, existing 92-foot Phase I Keck Building to the north, and new 105-foot-tall Education & Conference Center and East Ambulatory & Research Building to the east.
S4	Education & Conference Center and East Ambulatory Care & Research Building	105 feet	Existing 92-foot-tall Phase I Keck Building to the north, existing 84-foot-tall residential building located immediately to the south
S5	Visitor Housing	73 feet	Existing 84-foot-tall residential uses to the north
S4	Saint John's Café	17 feet	Existing 92-foot-tall Phase I Keck Building to the north, existing 84-foot-tall residential building located immediately to the south
2C	West Ambulatory & Acute Care Building	95 feet	Existing 92-foot-tall Phase I Keck Building to the northeast, existing 84-foot-tall and existing 168-foot-tall medical office buildings to the west.
2D/E	East Ambulatory & Acute Care Building	75 feet	Existing 92-foot-tall Phase I Keck Building to the north and 84-foot-tall residential building immediately to the south
2I	20th Street Medical Building	60 feet	Existing 86-foot-tall medical building to the north, existing 168-foot-tall medical office building immediately to the south.
*	Mullin Plaza Cafe	17 feet	Existing 92-foot Phase I Keck Building to the north

* Mullin Plaza would be directly across Santa Monica Boulevard from St. John's Square in Site S4.
SOURCE: ESA 2019.

New sidewalks and pedestrian paths would provide a new and improve pedestrian realm that would link the PSJHC buildings, plazas, and open spaces. An extensive pedestrian pathway (Wellness Walk) weaves through both Phase II and the existing Phase I sites to create a pedestrian-friendly, integrated PSJHC and promote exercise, health, and wellness among visitors, patients, and staff.

The Project would also include pedestrian enhancements to connect PSJHC to the surrounding neighborhood. The South Campus includes new sidewalks that connect through the South Campus from Broadway to Santa Monica Boulevard. The new buildings would be designed with porous and visually open ground levels and activated ground floor uses to facilitate pedestrian movement and activity. The existing multi-family residential building and senior housing building located on the east side of 21st Street between Broadway and Santa Monica, that are not owned by PSJHC, would have new pedestrian connections to and through the South Campus.

D170258.00

SOURCE: PSJ, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.1-5
Rendering: Ground-level View from Mullin Plaza Looking South

ESA

D170258.00

SOURCE: PSJ, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.1-6
Rendering: Ground-level View along Santa Monica Boulevard Looking West

ESA

D170258.00

SOURCE: PSJ, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.1-7
Rendering: Ground-level View from Saint John's Square Looking Towards the North Campus

ESA

D170258.00

SOURCE: PSJ, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.1-8
Rendering: Ground-level View from the Lobby of the
Education & Conference Center and East Ambulatory Care & Research Building Looking North

ESA

D170258.00

SOURCE: PSJ, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.1-9
Rendering: Ground-level View from Broadway Looking West

ESA

D170258.00

SOURCE: PSJ, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.1-10
Rendering: Ground-level View from the South Garden Looking West

ESA

D170258.00

SOURCE: PSJ, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.1-11
Rendering: Ground-level View of the Visitor Housing and Multi-Family Housing from Broadway

ESA

D170258.00

SOURCE: PSJ, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.1-12
Rendering: Ground-level View from the Sun Garden Looking South

ESA

D170258.00

SOURCE: PSJ, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.1-13
Rendering: Ground-level view from 20th Street looking east toward the 20th Street Medical Building

ESA

Additional open space for PSJHC users would be provided as part of the Child and Family Development Center and on roof decks of select buildings. In addition, 21st Street is proposed to be dedicated to pedestrians north of the existing apartment buildings (1417- 1423 21st Street) to reinforce an active pedestrian environment.

The Project would involve the removal of a number of street trees; these would be replaced with new trees as determined by the Urban Forester. It is estimated that 16 trees would be removed and as such, restitution for the planting of approximately 120 trees would be required. The final number of trees would be determined based on size, health, condition of tree at the time it is proposed for removal.

Signage and Lighting

The Project would incorporate a variety of informational, wayfinding and identification signage. Wayfinding/directional signage for vehicles, bicyclists and pedestrians would be integrated throughout the Campus. These signs would generally be free-standing/monument signage. There would also be building identification signage, including for building names and addresses, mounted on buildings to identify buildings, services and entrances. Except as may be provided in the Development Agreement (DA) or approved by the ARB, the signage would be consistent with Chapter 9.61 of the SMMC. No signage plan has been provided as of yet; however, new signage would have to either be approved by the ARB or at the City staff level. The DA and/or the Phase II Master Plan may set forth specific standards and guidelines pertaining to signage.

4.1.4.4 Project Impacts

As noted in the Regulatory Framework section above, Section 21099(d)(1) of the CEQA Statute (SB 743) provides that aesthetic impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. Because the Project meets the requirements of SB 743 and pursuant to State Law, the Project's aesthetic impacts are not considered significant impacts on the environment.

At the same time, analyses have been undertaken to determine whether the Project's impacts would exceed thresholds normally used by the City for analyzing the significance of a Project's impacts on aesthetics. The below analyses indicate that the Project's impacts would fall below the standards normally used by the City for determining impacts, regarding the following aesthetics components: aesthetic character, views, light and glare, shading and consistency with adopted plans.

Scenic Vistas

Impact AES-1: *Would the project have a substantial adverse effect on a scenic vista?*

Impact Statement AES 1- There are no protected views or view corridors within the Project area and no scenic vistas across the Project Site. Implementation of the Project would not have a substantial adverse effect on a scenic vista.

Examples of local valued views in the City include those of the Pacific Ocean, the Santa Monica Mountains. Views of the ocean and beaches are obtained from the western portion of the City,

along the Pacific Coast Highway and Ocean Avenue, at the Santa Monica Pier, along Palisades Park, and along the walkways provided at the beaches north and south of the Santa Monica Pier. The City's Local Coastal Plan Land Use Plan identifies several scenic vistas near the Pier and along Ocean Avenue. Due to distance and intervening topography, views of the Pacific Ocean are limited from east to west corridors along Santa Monica Boulevard, Broadway, and Arizona Avenue near the Project Site. Limited views of the Santa Monica Mountains to the north are available from north and south corridors such as 23rd Street and 20th Street adjacent to the Project Site. There are no protected views or view corridors within the Project area and no scenic vistas across the Project Site.

Implementation of the Project would include development of an above-grade Pedestrian Connection over Santa Monica Boulevard linking the West Ambulatory Care & Research Building on Site S3 and the West Ambulatory & Acute Care Building on Site 2C. The above-grade pedestrian connection would have a maximum height of 60 feet (excluding parapet). The façade of the Pedestrian Connection would be constructed of visually transparent materials such as glass. The Pedestrian Connection would reflect the design of the new West Ambulatory Care & Research Building and the West Ambulatory & Acute Care Building, visually linking the two buildings on both sides of the street. As no scenic views of the Santa Monica Mountains or Pacific Ocean are available from Santa Monica Boulevard, and Santa Monica Boulevard does not serve as an important view corridor, the Pedestrian Connection would not obscure or interfere with any valued scenic views.

The Project would not substantially block panoramic or focal views of scenic resources from public view points. It would not block scenic views that occur in the background of open street corridors (such as views of the Pacific Ocean) since no such views are available in the area. The Project would not have a substantial adverse effect on a scenic vista. Furthermore, and as previously stated, this analysis is provided for informational purposes only since impacts are considered less than pursuant to PRC Section 21099(d)(1).

Scenic Resources within a Scenic Highway

Impact AES-2: *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway or a locally-designated scenic corridor?*

Impact Statement AES 2: The Project is not located on or near a scenic highway. Implementation of the Project would not substantially damage scenic resources within a scenic highway.

The Project is not located on or near a scenic highway. Although there is no scenic highway near the Site, as noted in Section 4.4, *Historic Resources* of this Draft EIR, four historic resources are located within the viewshed of the Project Site: the Santa Monica Doctors Office at 2125 Arizona Avenue; a corner commercial building located at 2301 Santa Monica Boulevard; the Kingsley Gates Mortuary located at 1925 Arizona Avenue; and McKinley School located at 2401 Santa Monica Boulevard. All of these structures are listed as local historic landmarks in the Santa Monica Citywide Historic Resources Inventory. Each of these historic structures are located outside of the Project Site and would not be altered as part of the Project. As noted in Section 4.4, *Historic*

Resources of this EIR, the Project Site is not part of the historic setting that contributes to the eligibility of these adjacent or nearby resources and the Project would not impact or materially alter any of the character-defining features that contribute to the eligibility of above listed structures a historical resource. Therefore, the construction or operation of the Project would not result in any significant direct or indirect impacts to the above listed historic resources in the Project vicinity.

As described in Section 4.4, *Historic Resources* of this EIR, ESA conducted an intensive-level investigation which included a pedestrian survey, research, and evaluation of potential historic resources on the Project Site. As a result of its investigations, ESA found the John Wayne Cancer Institute at 2200 Santa Monica Boulevard and the Child & Family Development Center at 1339 20th Street eligible as local historic resources and qualify as historical resources under CEQA. The John Wayne Cancer Institute (Site S4) and the Child & Family Development Center (Site 2I) would be removed as part of the Project in order to construct the Saint John's Square and Education & Conference Center and East Ambulatory & Research Building (Site S4) and the 20th Street Medical Building (Site 2I). The Project would have a significant and unavoidable impact on historical resources to the loss of the John Wayne Cancer Institute and the Child & Family Development Center. The historical significance of the Healthcare Mixed Use District is based the non-contiguous grouping of thematically related properties, defined primarily by their historical associations. However, the John Wayne Center Institute and the Child & Family Development Center are considered excellent examples of Mid Century Modern architecture and, for that reason, are considered to be scenic historic resources.

As described below, while the John Wayne Cancer Institute would be removed, it would be replaced by a substantial new open space area, Saint John's Square, which would include new landscaping, seating areas, pedestrian pathways, outdoor dining areas, and outdoor programs. As such, while the historic John Wayne Cancer Institute would be removed as part of the Project, a new prominent scenic open space would be created in the building's place. The creation of Saint John's Square, which as it is situated across from Mullin Plaza, would create a new large scenic resource along both sides of Santa Monica Boulevard, creating a substantial and distinctive new visual resource along Santa Monica Boulevard that would off-set to some degree the adverse visual effect associated with the loss of historical resources (see Figures 4.1-5 and 4.1-6).

While Child & Family Development Center would be removed and the new 20th Street Medical Building would be constructed, the new 20th Street Medical Building would add visual interest to 20th Street with a unique, contemporary design that echoes mid-Century Modern architectural elements. The building's ground level would include landscaping and incorporate pedestrian-oriented design elements, including large windows, outdoor seating, and multiple pedestrian entrances to promote activity at street level. While the historic Child & Family Development Center would be removed, it does not particularly enhance the streetscape under existing conditions, as it includes minimal open space and landscaping. As such, the development of the 20th Street Medical Building would improve the visual environment compared current conditions along 20th Street as Site 2I would be enhanced with a contemporary building that adds visual interest and activates the street.

Although the Project would result in direct impacts to historic resources, the loss of these resources from an aesthetic perspective would be off-set to some degree by new construction exhibiting high quality architecture, landscape design and increased open space. As previously stated, this analysis is provided for informational purposes only since impacts are considered less than significant pursuant to PRC Section 21099(d)(1).

Project Consistency with Regulations that Govern Scenic Quality

Impact AES-3: *If the project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?*

Impact Statement AES -3: The Project would be consistent with applicable regulations and policies addressing scenic quality including those set forth under the SMMC, the Santa Monica Urban Forest Master Plan, the Land Use and Circulation Element, and the Hospital Area Specific Plan. Therefore, impacts with respect to regulations governing scenic quality would be less than significant.

Santa Monica Municipal Code

Zoning Ordinance Chapter 9.55, Architectural Review

The Project's aesthetic character, including building design and landscaping standards, architectural features, sign regulations, and open space and setback requirements would be established under a Development Agreement, as provided under Chapter 9.55 of the SMMC. Section 9.55.040, Guidelines and Standards, allows the Architectural Review Board to establish guidelines and standards to implement the purpose of architectural review to preserve existing areas of natural beauty, to assure that buildings, structures, signs or other developments are in good taste, good design, harmonious with surrounding developments and in general contribute to the preservation of Santa Monica's reputation as a place of beauty, spaciousness and quality; to prevent the development of structures or uses which are not of acceptable exterior design or appearance, are of inferior quality or likely to have a depreciating effect on the local environment or surrounding area by reason of appearance or value. The Phase II Master Plan, which establishes the basic parameters the DA include building placement, building heights, minimum setbacks for all buildings, minimum stepbacks for all buildings, and open space. In the approval of the DA, the ARB considers factors set forth in Section 9.55.040.A through D, below. As discussed below, the Project would be substantially consistent with the required findings.

Section 9.55.040.A: The integrity of neighborhood environments:

The Project would maintain the integrity of neighborhood environments in that it would be consistent with the architectural theme and use of the existing Campus. The proposed Phase II medical buildings would not exceed the mass and heights of many existing buildings in the surrounding area (see Table 4.1-1, Summary of the Building Heights). In addition, the proposed medical buildings would not encroach into the surrounding established residential neighborhood. Where the South Campus adjoins existing, off-site residential uses, the Phase II Project would incorporate landscaped setbacks, such as the new South Garden, Sun Garden and Woodland Garden, to buffer adjacent residential buildings from the new Phase II development. It would locate its low-rise multi-family component (Site S2) adjacent to similar-in- scale, off-site residential

building, while maintaining a 20-foot landscaped setback to allow for light and air circulation between buildings.

Section 9.55.040.B: Existing local, social, aesthetic, recreational and cultural facilities, designs and patterns within the district:

The Project would enhance the area's cultural, social, and aesthetic character with interfacing open spaces (the new Saint John's Square and the expanded Mullin Plaza), which centered on Santa Monica Boulevard. These open spaces would provide visual relief between the street and the larger new developments (S3 and S4) in the South Campus and the existing Medical Center and new developments 2C and 2DE in the North Campus. The plazas would create a space where people could gather or dine at proposed cafés or enjoy outdoor dining areas or future cultural activities. Seating and landscaping would be inviting to the surrounding community by creating a focal point available to the public.

Section 9.55.040.C: The disparate elements of neighborhood communities within a district and the architectural relationship of adjoining neighborhood communities:

The Campus adjoins two multi-family residential uses, an 84-foot-high building along 21st Street and a 42-foot-high building along 23rd Street/Schader Drive, which are not part of the existing Campus or the Phase II Master Plan. In order to reduce the Project's impingement on these lower intensity uses, the Project would incorporate new landscaped setbacks or small park settings, such as South Garden, Sun Garden, and Woodland Garden, as buffers between the proposed medical buildings and the residential uses. The Project would install a row of trees along 21st Street to buffer the Broadway residential use from the 47-foot-high proposed Child and Family Development Center (S1) and the 89-foot high West Ambulatory Care and Research Center (S3). The Broadway residential use would be farther from the 105-foot-high Education and Conference Center and East Ambulatory Care and Research Center (than from the West building) and would be primarily buffered from the East building by the South Garden. The Project would also install a deep, landscaped setback between the Broadway residential use and the street (Broadway). These setbacks would allow for visual relief and allow for light and air circulation between buildings. The Project would also locate its 36-foot-high multi-family component (Site S2) adjacent to the existing 23rd Avenue residential building, while maintaining a 20-foot landscaped setback between buildings. In addition, the Phase II visitor's housing (Site S5) would be located at the southwest corner of the Campus adjacent to Site S2. As such, these residential uses would provide a transition in function and scale between the Campus and the adjoining, disparate (residential) land use.

Section 9.55.040.D: General patterns and standards of architectural development within the entire district:

The Phase II Master Plan is intended to create a unified pattern of development and design quality over the Campus. The Project would incorporate a range of contemporary architectural styles, such as the use of glass, transparency, a light color palette, and building stepbacks that would contribute to the existing modern theme of the Campus and the surrounding community. It would provide landscaped setbacks along public street frontages and create expansive open spaces (Saint John's Square and Mullin Plaza) in place of existing surface parking lots. The interfacing plazas would enhance the visual character of the highly traveled Santa Monica Boulevard, as such, contribute the visual character of the broader community.

Zoning Ordinance Section 9.21.080

SMMC Section 9.21.080 (shielding/glare) requires that all lighting fixtures shall be shielded as to not produce obtrusive glare onto the public right-of-way or adjacent properties. All luminaries shall meet the most recently adopted criteria of the Illuminating Engineering Society of North American for "Cut Off" or Full Cut Off" luminaries." Further, Section 9.21.080 requires that (for light trespass) that lighting may not illuminate other properties in excess of a measurement of 0.5-foot candles of light." The Project would be required to comply with these regulation, or with any additional light restrictions imposed under the Phase II Master Plan Development Agreement. Development plans would specify appropriate cut-off or shielded fixtures prior to approval. In addition, the Project must comply with this requirement throughout the life of the Project or as otherwise specific in additional discretionary actions.

Zoning Ordinance Section 9.21.120

Zoning Ordinance Section 9.21.120 states that "No more than 25 percent of the surface area of any façade on any new building contain black or mirrored glass or other mirror-like material that is highly reflective, and that materials for roofing be of a non-reflective nature" (this requirement does not apply to solar energy systems). Section 9.21.120 also states that "glazing on the ground floor street frontage façade shall be clear glass." Development plans for individual buildings would be reviewed by the Building Department for compliance prior to construction.

SMMC Chapter 7.40 (Tree Code)

The purpose of this Chapter is to protect trees on City property or within the street right-of- way. Under Section 7.40.140, no person shall cause intentional damage to a tree or install any planting that would interfere with the growth or maintenance of a public tree. The Project would require the removal of approximately 16 street trees. In order to comply with Chapter 7.40 and reduce the harm to the urban forest, the Project would replace removed public trees with 24-inch boxed trees in exceedance of those removed. The species of replacement trees, quality, spacing, care and other requirements would be determined by the Public Works Director, in accordance with the Chapter 7.40 and the recommendations of the City's Urban Forest Master Plan (2017). With the Project's proposed minimum six-foot landscaped setbacks along public sidewalks, replacement of existing surface parking lots with landscaped open space, and replacement of removed trees to be determined by the Urban Forester, the Project would be considered consistent with the objectives of the Tree Code.

City of Santa Monica Urban Forest Master Plan

The trees in any public street or public place in Santa Monica are collectively referred to as a Community Forest and are managed by the City's Public Landscape Division. The Project would remove approximately 16 trees within the public right-of-way, which are part of the City's urban forest. Although the UFMP states that the best option for existing public trees is to retain them in their existing locations, relocation and/or replacement of public trees may be considered as part of new city public improvement projects: "If a healthy public tree is removed or destroyed, it loss will be accounted for by sufficient levels of replacement tree planting".[2] The City's Council of Tree & Landscape Appraisers used several factors to determine the number of replacement trees required

[2] City of Santa Monica Urban Forest Master Plan, Revised 2017, page 53.

to mitigate the loss of existing mature trees. All tree removals, relocations, and plantings within public right of way are subject to review and approval by the City upon completion of each project's community design and commission review process. The Project's proposed minimum 6-foot landscaped setbacks along public sidewalks, replacement of existing surface parking lots with landscaped open space, replacement of removed trees at a much higher ratio than under existing conditions, and the location of landscaped areas, such as Sun Garden, South Garden, and Woodland (tentative name) Garden in the South Campus and throughout the Campus, the Project would increase the City's urban forest throughout the Project Site and compensate for removed trees. Because the Project would increase the urban forest itis considered consistent with the objectives of the Tree Code.

Land Use and Circulation Element

The Project is compared to applicable scenic quality goals of the LUCE in **Table 4.1-2**, *Comparison of the Project with Scenic Character Policies of the General Plan Land Use and Circulation Element*. As shown in Table 4.1-2, the Project would be consistent with city-wide design goals to enhance the City's urban form in a manner that is compatible with neighborhoods. The Project would create a comfortable pedestrian environment, expand or create new landscaped open space, provide landscaped setbacks along the Phase II street fronts, and replace surface parking lots with distinctive new buildings. Buildings would incorporate pedestrian-scaled elements such as ground floor transparency, and the use of durable, quality materials and detailing located on the lower stories adjacent to the pedestrian. The Project would feature roofline variations that would contribute to the City's urban profile Phase II Buildings would be similar in scale and height to the surrounding Campus and some adjacent, off-site buildings. New buildings would incorporate step backs to minimize the sense of bulk and to add visual interest.

The Project would also be consistent with specific goals and policies pertaining to the Healthcare District in that it would provide a comfortable pedestrian environment by providing landscaped setbacks along the adjacent streets and new landscaped open spaces, including Saint John's Square and the redesigned and expanded Mullin Plaza as the heart of the overall Campus and other garden areas, such as the South Garden, Sun Garden, and Woodland Garden in the South Campus. Open space would also be added to the North Campus (Site 2I) to provide an opportunity for respite and relaxation on this site. The Project's buildings would be designed to be compatible with the architectural character and scale of the existing Campus and surrounding area. The new contemporary buildings would feature transparent surfacing materials and a light palette consistent with Santa Monica's urban character. New buildings located along public streets, such as the 20th Street Medical Building, would be oriented to the adjacent streets. However, the Project incorporates two large, open space areas, the new Saint John's Square and the expanded Mullin Plaza, which face each other across Santa Monica Boulevard and create a continuity between the North and South Campus and an enhanced open space and a place where people can gather, socialize, or dine. As appropriate to their location and function, buildings would be scaled to create a pedestrian-scale experience along adjoining sidewalks. The Project would be designed with a variety of heights, roof types, architectural elements and shapes to create visual interest along the street. Step backs and articulation of facades would create shadow patterns to engage the eye. Mullin Plaza and Saint John's Square would provide outdoor dining in connection with future cafés

at these open space sites. Therefore, as discussed in Table 4.1-2, the Project would be substantially consistent with applicable LUCE policies that govern scenic quality.

TABLE 4.1-2
COMPARISON OF THE PROJECT WITH SCENIC CHARACTER POLICIES OF THE GENERAL PLAN LAND USE AND CIRCULATION ELEMENT

Policy/Goal	Analysis of Project Consistency
City-wide Design Goals and Policies (Chapter 2.1)	
Goal LU15: Enhance Santa Monica's Urban Form – Encourage well-developed design that is compatible with the neighborhoods, responds to the surrounding context, and creates a comfortable pedestrian environment.	**Consistent.** The Project would change the existing visual character of the area by demolishing existing medical buildings and surface parking lots on the North and South Campus and constructing new buildings ranging from 17 feet to 105 feet in height. Buildings would be consistent in height with existing surrounding development (see Table 4.1-1, *Summary of Building Heights*, above. The Project's new contemporary buildings would incorporate exterior wall stepbacks, varied roof types, and harmonious architectural design, as well as transparent surfacing materials, such as glass, and a light color palette that would complement the surrounding context and enhance the City's urban form. Buildings along Santa Monica Boulevard are envisioned to be reflective of and harmonious with PSJHCs' other existing and proposed buildings to create a unified Campus appearance along Santa Monica Boulevard. The Project would include new landscaped setbacks, including a six-foot setback from the property line along Santa Monica Boulevard and a 20-foot setback between the residential uses (S2) and the off-site residential property. Saint John's Square would include landscaping, pedestrian pathways, outdoor dining and café, directly across from Mullin Plaza, would create a new visually prominent central scenic open space area along Santa Monica Boulevard. Surface parking lots would be removed and all parking relocated to future subterranean parking facilities. New sidewalks and pedestrian paths would provide a new and improve pedestrian realm that would link the PSJHC buildings, plazas, and open spaces. The Wellness Walk weaving through both Phase II and the existing Phase I, as well as Visitor Housing building, which would incorporate pedestrian-oriented design elements such as tall windows would create a comfortable, pedestrian-friendly environment.
Policy LU 15.3: Context-Sensitive Design. Require site and building design that is context sensitive and contributes to the City's rich urban character.	**Consistent.** The Project's buildings along Santa Monica Boulevard would reflect and be harmonious with PSJHCs' other existing and proposed buildings to create a unified Campus appearance along Santa Monica Boulevard. The new contemporary buildings would feature light and transparent surfacing materials consistent with and building on Santa Monica's urban character.
Policy LU 15.4: Open and Inviting Development. Encourage new development to be open and inviting with visual and physical permeability, connections to the existing street and pedestrian network, and connections to the neighborhoods and the broader community.	**Consistent.** Expanded open space areas and new cafés, including Saint John's Square and Mullin Plaza, and new sidewalks and pedestrian paths would provide an inviting pedestrian realm that would link the PSJHC buildings, plazas, and open spaces, as well as the City's pedestrian grid.

Policy/Goal	Analysis of Project Consistency
Policy LU 15.5: Pedestrian and Bicycle Connectivity. Encourage the design of sites and buildings to facilitate easy pedestrian- and bicycle-oriented connections and to minimize the separation created by parking lots and driveways.	**Consistent**. The Project would provide enhanced vehicular, pedestrian, and bicycle access and circulation to minimize vehicle/pedestrian/bicycle conflicts. The Project would provide new bicycle connections to the dedicated bicycle lane on Broadway, bicycle parking, showers, and clothes lockers, pedestrian pathways, and widened sidewalks on Santa Monica Boulevard and Broadway to encourage active transportation.
Policy LU 15.7: Street–Level Pedestrian-Oriented Design. Buildings in the mixed-use and commercial areas should generally be located at the back of the sidewalk or the property line (street front) and include active commercial uses on the ground floor. Where a residential use occupies the ground floor, it should be set back from the property line, be located one-half level above the street or incorporate design features to provide privacy for the unit. Front doors, porches and stoops are encouraged as part of orienting residential units to the street.	**Consistent**. The Project would incorporate pedestrian-oriented features. For instance, the West Ambulatory & Acute Care building would be set back from Santa Monica Boulevard a minimum of six feet from the property line and would include street level landscaping. The ground level would be pedestrian-focused with health-related services, restaurant, or neighborhood commercial uses and would feature window glazing and transparent elements to help activate the pedestrian environment. The 20th Street Medical Building would include landscaping, a six-foot setback from the property line, and incorporate pedestrian-oriented design elements, including large windows, outdoor seating, and multiple pedestrian entrances to promote activity at street level. The multi-family uses would be oriented toward the street, with projecting canopies and exterior staircases to create a distinctly residential and pedestrian aspect,
Policy LU 15.8: Building Articulation. Building façades should be well designed with appropriate articulation in the form of setbacks, offsets, projections and a mix of architectural materials and elements to establish an aesthetically pleasing pattern. Large areas of glass above the ground floor require special design consideration. Highly reflective materials are to be avoided, and dark or reflective glass is prohibited.	**Consistent.** The Project's buildings would be set-back and articulated to add architectural interest, and to reduce the taller buildings' sense of mass. For instance, the West Ambulatory & Acute Care Building (95 feet in height), would be articulated, in which the top level would be stepped back from the middle façade to reduce the building's perceived height. The East Ambulatory Care & Research Building (105 feet in height) would be broken into two sections to reduce the building's massing. Materials used in the construction of new buildings, including the proposed Pedestrian Connection, would conform to Section 9.21.120 of the SMMC, which prohibits the use of highly reflective materials and limits glare effects. In addition, the evaluations of exterior cladding and materials are required through the City's Architectural Review Board design review process. Compliance with the existing regulation and Architectural review would ensure that the Project would avoid the use of highly reflective exterior materials and cladding.
Policy LU 15.9: Pedestrian-Oriented Design. Buildings should incorporate pedestrian-scaled elements with durable, quality materials and detailing located on the lower stories adjacent to the pedestrian.	**Consistent.** Materials used in the articulation of ground levels, such as doorway shelters or awnings for the multi-family uses, would be consistent with the Project's durable architectural and structure quality.
Policy LU 15.10: Roofline Variation. Buildings should be designed with a variety of heights and shapes to create visual interest while maintaining a generally consistent overall street front. To achieve this goal, development standards should provide flexibility to encourage buildings with interesting silhouettes and skylines, and the primary building façade shall not be lower than the designated minimum street façade height.	**Consistent.** The Project would implement a variety of building heights, roof treatments, and styles (such as the modern wedge represented by the 20th Street Medical Building), as well as articulation of exterior walls, different window types, and other varied features. Although coordinated throughout the Campus, the variety of roof styles and articulated building silhouettes, would enhance the visual setting.

Policy/Goal	Analysis of Project Consistency
Policy LU15.11: Building Façades and Step Backs. Buildings should generally conform to the minimum and maximum requirements for the street façade height established for their designated area. Portions of a building façade higher than the street frontage, 35 feet for most mixed-use areas, shall step back from the façade of the floor below in a manner that will minimize the visual bulk of the overall building as viewed from the public sidewalks and roadway and ensure maximum light, air and sense of openness for the general public. Guidelines or standards for the building mass above the street wall shall be established in the zoning ordinance.	**Consistent.** The Project is not a mixed-use project in that it would not provide residential uses above ground-level retail or restaurant uses along a pedestrian-oriented street. However, as shown in Project renderings in Chapter 2, *Project Description*, of this EIR, conceptual plans indicate varied and detailed architectural articulation of building profiles. Building step backs in the new buildings would be commiserate with the Campus setting, in which building styles are intended to create an aesthetic harmony between new and existing (to remain) buildings. Building plans would be submitted to the Architectural Review Board prior to approval, which would ensure consistency with the City's design objectives for building façades and step backs.
Specific Goals and Policies pertaining to the Healthcare District (Chapter 2.6)	
Policy D28.8: Encourage the development of a comfortable landscaped pedestrian environment including plazas and usable landscaped open spaces with all major renovations to hospital facilities	**Consistent.** The Project would create a comfortable pedestrian environment by providing landscaped setbacks along the public streets and through the incorporation of new landscaped open spaces, including Saint John's Square and the redesigned and expanded Mullin Plaza as the heart of the overall Campus. Several garden areas are also planned and include the South Garden, Sun Garden, and Woodland (tentative name) Garden. Open space would also be added to the North Campus (Site 2I) to provide an opportunity for respite and relaxation on this site. The Project would also incorporate an extensive pedestrian pathway (Wellness Walk), which would weave through the Campus to create a pedestrian-friendly and wellness-enhancing feature.
Goal 30: Ensure that new and remodeled buildings in the Healthcare District are compatible in scale and character with existing buildings and the surrounding residential neighborhood.	**Consistent.** The Project's buildings would be designed to be compatible with the architectural character and scale of the existing Campus and surrounding area. The Project's Buildings along Santa Monica Boulevard would reflect and be harmonious with PSJHCs' other existing and proposed buildings to create a unified Campus appearance along Santa Monica Boulevard. The new contemporary buildings would feature light and transparent surfacing materials consistent with Santa Monica's urban character. The Campus and multifamily buildings would not exceed the height and mass of other taller structures within the Campus and the surrounding area.
Policy D30.1. Encourage the primary facades of buildings to face the street with the building face located on the property line or back side of the sidewalk along sidewalks or pedestrian ways. However, to encourage a lively streetscape with places for people to socialize, small landscaped gathering spaces and plazas are encouraged.	**Consistent.** New buildings located along public streets, such as the 20th Street Medical Building, would be oriented to the adjacent streets. However, the Project incorporates two large, open space areas, the new Saint John's Square and the expanded Mullin Plaza. These plazas face each other across Santa Monica Boulevard and create a continuity between the North and South Campus. They provide an enhanced, landscaped open space and a place where people can gather, socialize, or dine within a centralized area at PSJHCs' front door. Other quieter garden areas for more passive recreation opportunities include the proposed Sun Garden, South Garden, and Woodland Garden.

Policy/Goal	Analysis of Project Consistency
Policy D30.2 Scale buildings to the pedestrian to create an intimate sidewalk experience. Incorporate enhanced materials and detailing in ground floor facades where they will be in close proximity to passing pedestrians.	**Consistent.** As appropriate to their location and function, buildings would be scaled to create a pedestrian-scale experience along adjoining sidewalks. For instance, the 20th Street Medical Building would be oriented toward the adjacent 20th Street. The building would feature a landscaped six-foot setback from the property line and incorporate pedestrian-friendly design elements at the ground level. These include glazing and multiple pedestrian entrances to promote activity at street level. The building's main circulation elements would be located on the 20th Street façade and specifically designed to create visual interest and activate this building frontage. This feature also has the functional purpose of incorporating daylighting and view strategies into the building. The West Ambulatory & Acute Care Building Pedestrian would be oriented toward Saint John's Plaza, with some frontage along Santa Monica Boulevard. The ground-level health-related services would include a restaurant, or neighborhood commercial uses and feature window glazing and transparent elements to help activate the pedestrian environment. The ground floor of the Visitor Housing building would include pedestrian-oriented design elements such as tall windows and distinctive vertical panels of various projections and materials, and windows and vertical panels.
Policy D30.3 Design buildings with a variety of heights, architectural elements and shapes to create visual interest along the street. Incorporate meaningful combinations of materials and three-dimensional articulation to create shadow patterns to engage the eye.	**Consistent.** As illustrated in the Project renderings in Chapter 2, *Project Description*, of this EIR, the Project would be designed with a variety of heights, roof types, architectural elements and shapes to create visual interest along the street. Step backs and articulation of facades would create shadow patterns to engage the eye.
Policy D30.4 Avoid buildings with uniformly flat roofs or cornices in order to create an interesting skyline.	**Consistent.** The Project would implement a variety of building heights, roof treatments, and styles (such as the modern wedge-style roof represented by the 20th Street Medical Building), as well as articulation of exterior walls, different window types, and other varied features. Although coordinated throughout the Campus, the variety of roof styles and articulated building silhouettes, would enhance the visual setting.
Policy D30.5 Establish a prescribed building envelope with stepbacks designed to maintain access to light and air where new healthcare or commercial use are located adjacent to the existing residential.	**Consistent.** The Project would incorporate a 30-foot landscaped setback (tentatively called the Woodland Garden) to buffer the off-site, existing residential uses at 1427 and 1433 21st Street from the South Campus, The Project's new multi-family use (S2) would be directly south of this off-site residential use and maintain a minimum 20-foot landscaped setback between the buildings. The proposed Sun Garden open space along Broadway would provide a buffer between the new Phase II Project buildings and the existing multifamily residential buildings to the northeast and northwest. The proposed landscaped setbacks would ensure that off-site residential uses have adequate access to light and air.

Policy/Goal	Analysis of Project Consistency
Policy D30.6 Encourage active retail and other ground floor uses with pedestrian interest to incorporate generally continuous, transparent non-tented display windows facing the sidewalk.	**Consistent.** Components of the Project, including the West Ambulatory & Acute Care building, would encourage retail activity and other ground floor uses through the use of large windows and transparent elements. The 20th Street Medical Building would incorporate pedestrian-oriented design elements, including glazing, outdoor seating, and multiple pedestrian entrances to promote activity at street level. Mullin Plaza and Saint John's Square, which are both oriented toward the Santa Monica Boulevard sidewalk, would be expanded or, in the case of Saint John's Square, newly developed to provide outdoor dining and similar activities to enhance the pedestrian environment.
Policy D30.7 Encourage active retail and other ground floor uses with pedestrian interest to incorporate generally continuous, transparent (non-tinted) display windows facing the sidewalk.	**Consistent.** The Project does incorporate a variety of uses, including street oriented commercial uses oriented to the sidewalk and intended to encourage pedestrian activity. See response to Policy D.30.6, above.
Policy D.30.8 Discourage offices and other limited pedestrian access uses on the ground floor facing the street or pedestrian ways.	**Consistent.** The Project is primarily a health services center and is not, in the strictest sense, a mixed-use with ground floor office uses. However, to the extent feasible, the Project would incorporate restaurants, sidewalk cafés, areas for entertainment (Mullin Plaza), and other uses at ground level that would both serve the visitors and employees of the Campus and the surrounding community.
Policy D30.9 Encourage sidewalk dining where it meets established criteria.	**Consistent.** Mullin Plaza and Saint John's Square would provide outdoor dining in connection with future cafés at these open space sites.

SOURCE: ESA 2019.

Hospital Area Specific Plan

The Project is compared to the policies of the HASP is to address issues of neighborhood concern, address the needs of modern hospitals in a competitive health care environment, to develop basic zoning and development standards, to identify parcels for rezoning, and to identify other programs which should be implemented in the area. Regarding scenic quality, the HASP sets forth the following objectives that are applicable to the Project:

- Objective Number 5: Establish development guidelines for the area which will serve as a transition between development standards on Wilshire and on Santa Monica Boulevards

  The Phase II Master Plan would incorporate design guidelines, such as minimum 6-foot landscaped setbacks and expanded open space (the new Saint John's Square and expanded Mullin Plaza) along Santa Monica Boulevard. Landscaped open space would soften the transition between the Project (a large-scale hospital complex) and other uses, including lower density uses, along Santa Monica Boulevard.

- Objective Number 7: Encourage the use of architectural materials and design which will be compatible with surrounding uses in the hospital area.

  The Phase II Master Plan's new buildings would be of contemporary design and harmonious in architectural character and with the Campus. Features will include building stepbacks to enhance shadowing and articulation. Buildings would feature a light color palette and transparent surfacing materials, such as glass, that would enhance visual access to building interiors from the street and throughout the hospital area.

- Objective Number 28: Promote quality housing and neighborhoods.

  The Phase II Master Plan's new 36-foot-high, three-story residential building (S2) would be consistent with the scale of the multifamily residences on 23rd Street, including the existing, adjacent 42-foot-high multifamily building (three floors of residences above ground level parking). The Phase II residential building would replace an existing surface parking lot, and provide a 20-foot landscaped setback between the two buildings. Sun Park in the southeast sector of the South Campus would further buffer the existing residential use from the new Phase II buildings. The Phase II residential building would be oriented toward the street, with projecting canopies and exterior staircases to create a distinctly residential and pedestrian aspect. With the replacement of the existing surface parking lot with a new building, the architectural style of which would be reviewed by the ARB, and similarity in scale with existing residential uses, the Project would promote quality housing and neighborhoods.

- Objective Number 74: Encourage architecturally attractive structures and the liberal use of landscaping along the Arizona Avenue bikeway.

  Arizona Avenue is currently landscaped along the entire North Campus frontage. Street front is liberally landscaped, with lawn and street trees in the sidewalk parkway and evergreen hedges mixed with trees along the property edge. The northeast corner of the Campus at Arizona Avenue and 23rd Street features a deep, landscaped open space relative to the property line. The landscaped setback near 23rd street is planted with lawn, flowering shrubs, and dense trees. A paved pathway, accessed at 23rd Street meanders through the open space. The architectural quality of the Campus in this area and the existing landscaping are consistent with this objective. The Project would not cause require any new development along this street front and existing landscaping and building setbacks will be maintained.

Summary of Regulations Governing Scenic Quality

As discussed above, the Project would be consistent with applicable SMMC regulations related to scenic quality, including design (architectural review), light and glare, and the Tree Code. The Project would also be consistent with the purpose of the Urban Forest Master Plan to preserve and/or increase the City's public trees, the goals and policies of the LUCE regarding citywide and hospital area design policies, and the objectives of the HASP to support harmony of design within the Campus and between the Campus and the surrounding community. Therefore, impacts with respect to consistency with applicable zoning and regulations that govern scenic quality would be less than significant. As previously stated, this analysis is provided for informational purposes only since impacts are considered less than significant pursuant to PRC Section 21099(d)(1).

Light and Glare

Impact AES-4: *Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?*

Impact Statement AES-4: Project implementation would create new sources of light and glare. However, light and glare levels would not adversely affect day- or nighttime views in the area. Compliance with standard regulations and design review approval, would ensure that impacts of the Project would be less than significant.

As discussed earlier, land uses immediately adjacent to the Project Site include a mix of medical, office, commercial, and residential uses, and surface parking. Several light sensitive land uses

occur in the Project vicinity which include: Berkley East Convalescent Hospital, several small apartment buildings and single-family residences across Arizona Avenue to the north; several small apartment buildings and single-family residential uses across 23rd Street to the east; and Santa Monica Villas and several small apartment buildings and convalescent homes across 20th Street to the west. Also, a small apartment building and several detached residential units are located north of Broadway on the east side of 21st Street. In addition, two schools are located in the immediate vicinity, including McKinley Elementary School located on Santa Monica Boulevard approximately one block to the east, and the Lighthouse Christian Preschool located on 20th Street approximately one block to the south.

The Project would introduce new interior building lighting and exterior lighting as part of the development of new buildings and landscaping. New outdoor lighting would include pedestrian safety lighting and new streetlights. New and modified lighting associated with the Project would serve to enhance the security of the site as well as the safe operation of the facility.

As with the existing development throughout the Project Site, lighting would be designed to appropriately respond to location, neighboring uses, purpose, activity, and activity level. Outdoor lighting would be provided in accordance with Section 9.21.080 of the SMMC. As such, lighting fixtures would be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties.

Furthermore, as described earlier, the Project vicinity exhibits considerable ambient nighttime illumination levels due to the densely developed and commercial nature of the area and 24-hour activity associated with existing hospital uses. Based on the above discussion, with compliance with applicable SMMC regulations, lighting associated with the Project would not create a new source of substantial light that would adversely affect day or nighttime views in the area.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic or glass curtain walls and trim.

Materials used in the construction of new buildings, including the proposed Pedestrian Connection, would conform to Section 9.21.120 of the SMMC, which prohibits the use of highly reflective materials and limits glare effects. Furthermore, evaluations of exterior cladding and materials are required through the City's ARB design review process. Thus, the Project would not create a new source of substantial light glare that would adversely affect day or nighttime views in the area.

Overall, Project implementation would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. Regardless, this analysis is provided for informational purposes since impacts are considered less than significant pursuant to PRC Section 21099(d)(1).

Shade and Shadow

Impact AES-5: *Would the project create shading effects that would interfere with the use of outdoor open space or solar accessibility?*

Impact Statement AES-5: Project implementation would create shadows over existing adjacent sensitive uses, however the shadows would not create shading effects that would substantially shade sensitive uses or interfere with the use of outdoor open space or solar accessibility.

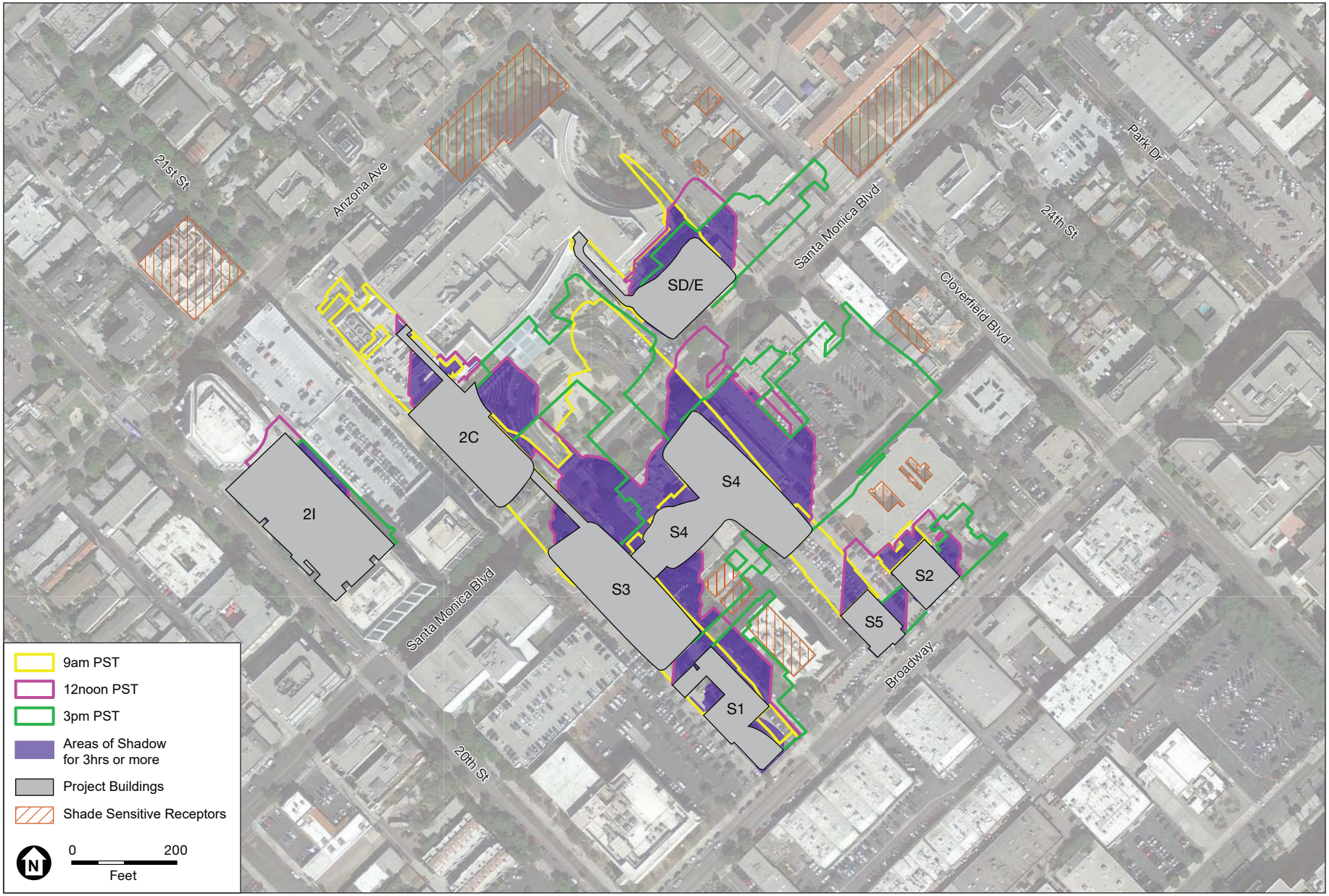
To determine the extent of the shading from the new buildings, shading diagrams were prepared to indicate the shading patterns that would occur during the Winter and Summer Solstice and Spring and Fall Equinox. (See **Figure 4.1-14,** *Winter Solstice (December 21) Off-Site Shadows*; **Figure 4.1-15**, *Summer Solstice (June 21) Off-Site Shadows*; **Figure 4.1-16,** *Fall Solstice (September 21) Off-Site Shadows*; and **4.1-17,** *Spring Equinox (March 21) Off-Site Shadows*). Shadows for all other times of the year can be interpolated between these four seasons and would not exceed the shadows identified occurring at these four points in time. Although some shading occurs under existing conditions, the shading analysis only includes the new structures associated with the Project and does not account for existing shading conditions and therefore is a conservative assumption.

The shading patterns are shown for the hours when sun accessibility is the greatest and of most use to the public. These hours include: the winter solstice between 9:00 a.m. and 3:00 p.m. Pacific Standard Time (PST) and between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (PDT) on the spring equinox, summer solstice, and fall equinox.

Some shading from new development is a common occurrence in urban areas. As reflected in the threshold of significance, the amount of such shading during these times is typically not considered substantial when it is less than 3 hours during the winter and less than 4 hours during the remaining seasons.

During the winter solstice, the sun's lower elevation in the southern sky causes buildings to cast shadows in a northwest, north, and northeast direction, with a relatively narrow path of travel between sunrise and sunset. The sun's lower elevation on the horizon also results in longer shadows than during summer, spring and fall, particularly at midday, and therefore analysis of shadow impacts during the winter solstice considers the period of greatest potential for off-site shading impacts.

Shade sensitive uses in the Project vicinity include Berkley East Convalescent Hospital, open space related to small apartment buildings and single-family residences along Arizona Avenue to the north; open space related to several small apartment buildings and single-family residential uses along 23rd Street to the east; and Santa Monica Villas and open space related to several small apartment buildings across 20th Street to the west and open space related to residential units along 21st Street. In addition, the outdoor play and sports areas of McKinley Elementary School located on Santa Monica Boulevard are considered sensitive uses.



SOURCE: ESA, 2018; Basemap Google Earth, 2018

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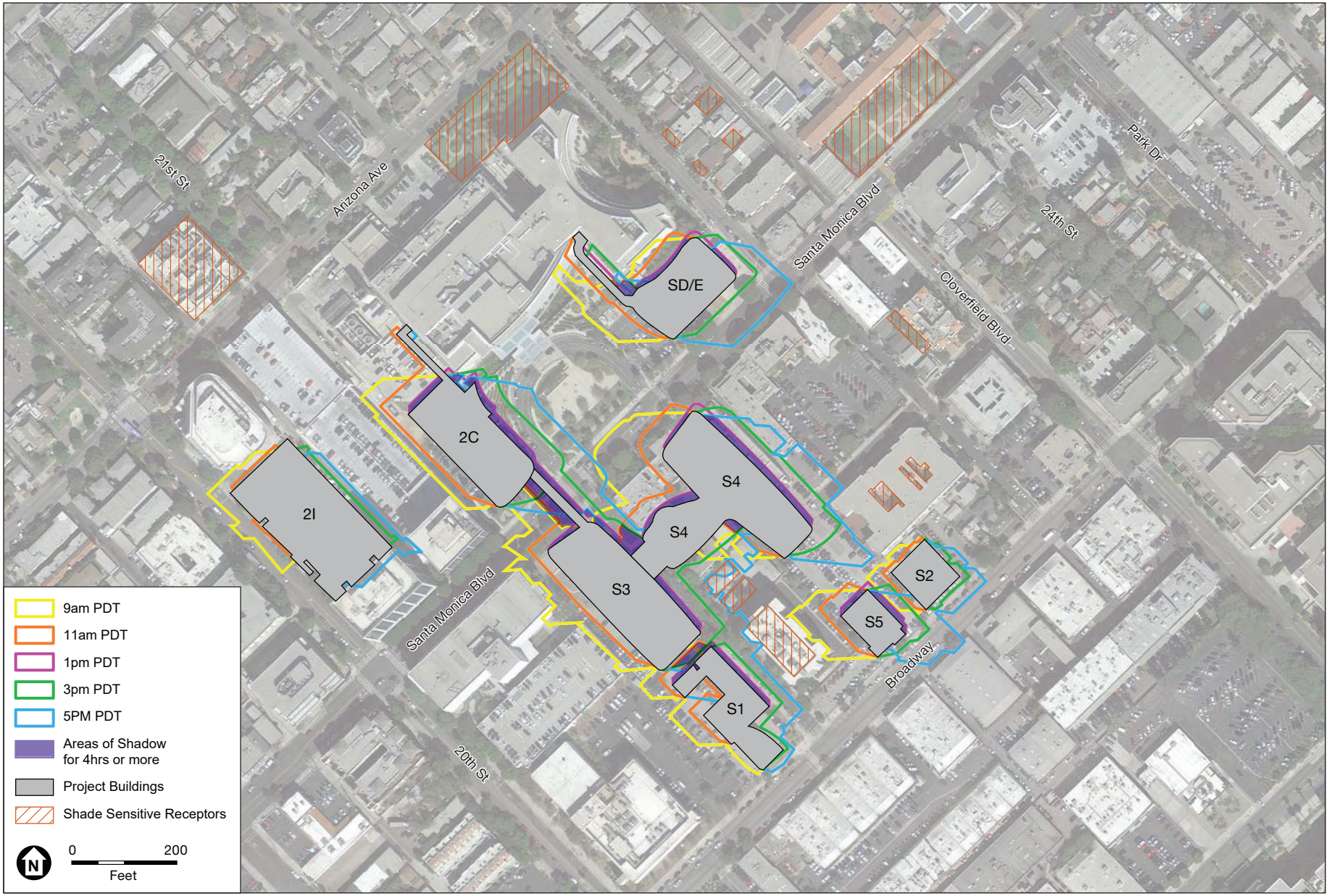
Figure 4.1-14
Winter Solstice (December 21)
Off-Site Shadows

ESA



SOURCE: ESA, 2018; Basemap Google Earth, 2018

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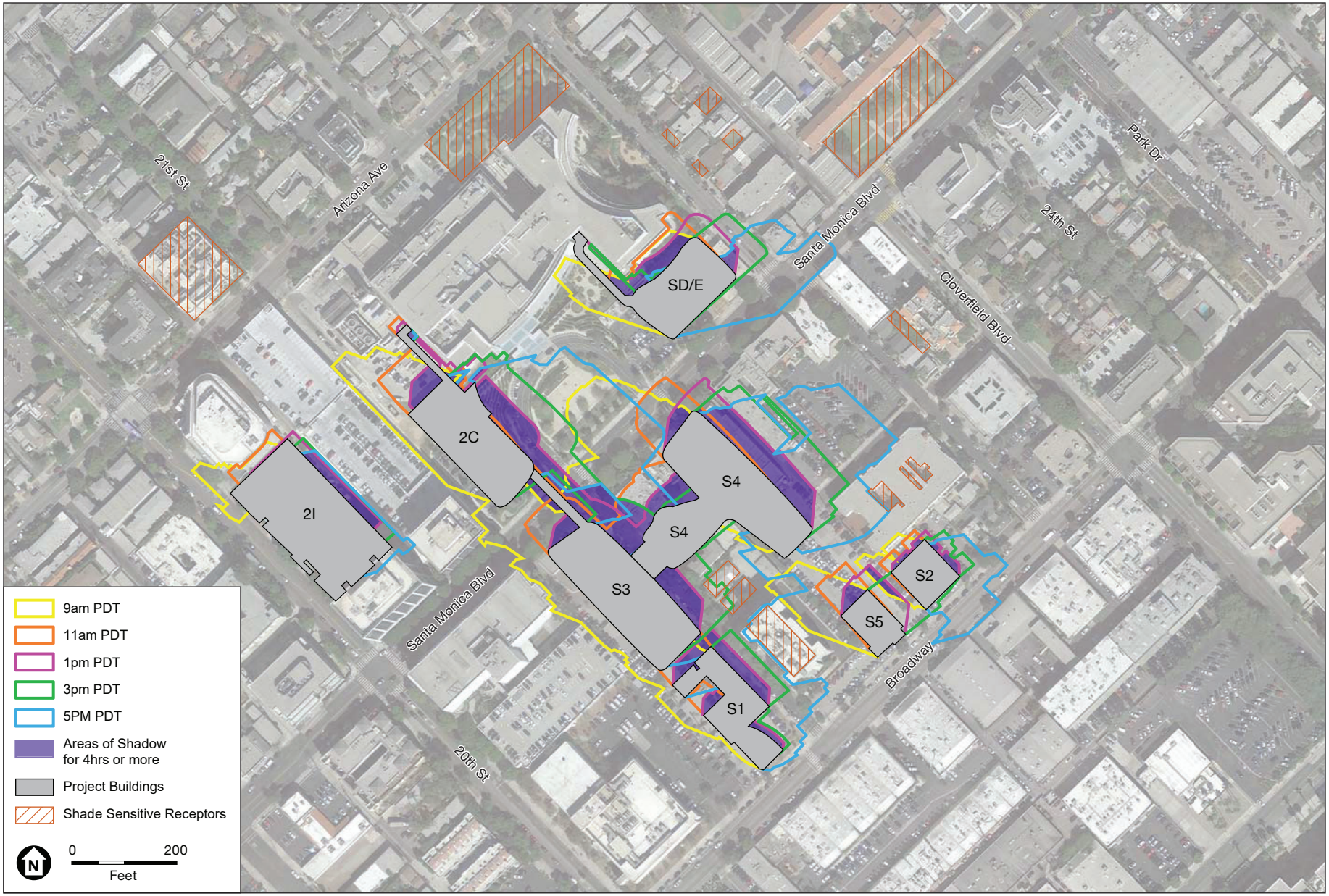
Figure 4.1-15
Summer Solstice (June 21)
Off-Site Shadows

ESA



SOURCE: ESA, 2018; Basemap Google Earth, 2018

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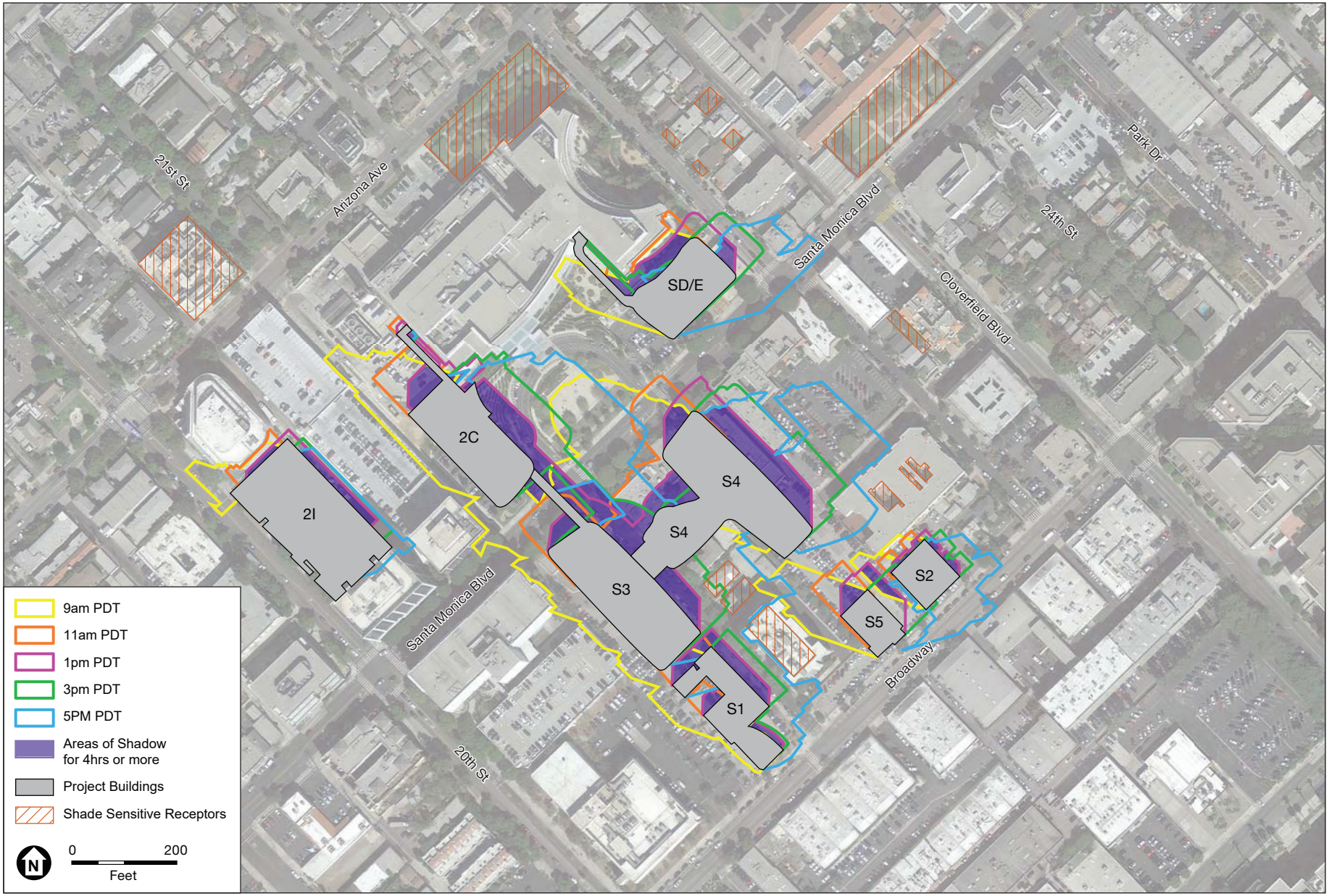
Figure 4.1-16
Fall Solstice (September 21)
Off-Site Shadows

ESA



SOURCE: ESA, 2018; Basemap Google Earth, 2018

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Figure 4.1-17
Spring Equinox (March 21)
Off-Site Shadows

ESA

As shown in **Figure 4.1-14** through **Figure 4.1-4-17,** shadows created by the Child and Family Development Center on Site S1 and the West Ambulatory Care and Research Building on Site S3 would extend to a portion of the residential uses along 21st Street at 3:00 pm during the Spring Equinox and Fall Equinox. However, the shadow duration would be less than 3 hours. During other periods of the year, shadows would not extend to the residential uses along 21st Street.

At no time during the year would shadows extend to the Berkley East Convalescent Hospital, open space related to small apartment buildings and single-family residences along Arizona Avenue, residential uses along 23rd Street or open space related to several small apartment buildings across 20th Street to the west or the McKinley Elementary School.

Therefore, as the Project would not shade any shade sensitive uses for more than 3 hours during the winter and less than 4 hours during the remaining seasons. Project implementation would not create shading effects that would substantially interfere with the use of outdoor open space or solar accessibility. Regardless, this analysis is provided for informational purposes only since the aesthetics impacts of the Project are considered less than significant pursuant to PRC Section 21099(d)(1).

4.1.4.6 Cumulative Impacts

A project can result in cumulative impacts on scenic vistas, scenic resources, visual character, light/glare, and shading when development of other nearby projects occurs within the same viewshed or along the same roadway as the projects. Impacts regarding scenic vistas, scenic resources, visual character and shading are local in nature, and are conducive to cumulative impacts when multiple projects are located in close proximity. Impacts regarding lighting can be affected by a larger number of projects spread throughout the City.

Chapter 3 of this EIR provides lists of cumulative projects that are proposed, approved, or are under construction in the vicinity of the Project Site. **Table 3-1**, *Cumulative Projects*, in Chapter 3, include a list of 131 cumulative projects as compiled by the City. It includes cumulative projects that have been approved, are currently under construction, and/or pending.

Scenic Vistas

As previously described in Existing Conditions, due to distance and intervening topography, views of the ocean and beach are limited from the east to west corridors near the Project Site such as Santa Monica Boulevard, Broadway, and Arizona Avenue. Limited views of the Santa Monica Mountains to the north are available from north and south corridors such as 23rd Street and 20th Street adjacent to the Project Site. Therefore, there are no protected views or view corridors within the Project area and scenic views are limited to partially available views of the Santa Monica Mountains from public streets. The development of cumulative projects in conjunction with the Project would not contribute to cumulative impacts on scenic vistas.

Scenic Resources within a Scenic Highway

As previously described in Existing Conditions, there are no designated scenic highways near the Project Site. Therefore, the development of cumulative projects in conjunction with the Project would not contribute to cumulative impacts on scenic resources within a scenic highway.

Regulations that Govern Visual Quality

There are in the Project Site vicinity that could potentially have cumulative visual quality impacts in combination with the Project: the 2225 Broadway mixed-use project (Cumulative Project No. 34), 1419 19th Street project (Cumulative Project No. 81), and 1242 20th Street Wellness Center Project (Cumulative Project No. 112). Other cumulative projects are located at such a distance or blocked by intervening development such that they would not be visible with the Project from local surrounding vantages.

The nearest project in the Project Site vicinity is at 2225 Broadway adjacent to the east of the S2 Site. The 2225 Broadway project is an approved mixed-use residential with ground floor commercial project that would be 35 feet in height. Although this cumulative project is located along the same Broadway street frontage as the Project Site, this project would comply with the City's Zoning Ordinance standards for the MUBL District and subject to ARB design review/approval. Furthermore, the Project's new 36-foot three-story Multifamily Housing building at Site S2 would be consistent with the 35-foot height of the 2225 Broadway project. Therefore, the Project and the 2225 Broadway project would cumulatively result in a more consistent street frontage for Broadway.

The medical office project located at 1419 19th Street is not located along the same street frontage as the Project Site and is separated by existing intervening development. Thus, it would not contribute to significant visual character changes in the same viewshed as the Project.

The 1242 20th Street Wellness Center project would be on the same 20th Street frontage as Site 2I and within the same viewshed as Project Site 2I. Since 1242 20th Street involves the adaptive reuse of an existing historic funeral home building at the corner of Arizona Avenue and 20th Street, it would present a similar appearance as existing conditions and would not substantially change the visual character of 20th Street. Furthermore, any exterior modifications would be conducted in accordance with Zoning Ordinance standards and would be subject to Architectural Review Board design and approval. Although the 1242 20th Street Wellness Center would include a new addition building on the western end of the site fronting Arizona Avenue, this building would not be visible from 20th Street (i.e., outside of the Project viewshed).

As discussed above, the Project would incorporate site and building designs that do not conflict with, but support the applicable aesthetics requirements of the SMMC, Urban Forest Master Plan, LUCE and HASP. As described above, non-compliance would indicate adverse scenic quality impacts. Because the Project would be substantially consistent with applicable plans and regulations, it would not contribute to cumulative inconsistencies with these plans in combination with related projects. It is also expected that cumulative projects, in the event they conflict with these guidelines and regulations, would include mitigation measures to the extent feasible to ensure consistency or compliance. Therefore, cumulative aesthetics effects related to conflicts with applicable regulations that govern scenic quality would be less than significant.

Light and Glare

The Project and the cumulative projects extending into a larger vicinity are located in an urbanized area with a mix of highly urbanized uses, many with light sources and signage that create a well-lit

nighttime environment. Cumulative projects occurring within the area typically includes similar lighting that is appropriate to nearby light sensitive uses. Such lighting would be anticipated to be in character with existing lighting levels in the area and would not significantly increase the existing ambient lighting levels. Furthermore, outdoor lighting for cumulative projects would be provided in accordance with Section 9.21.080 of the SMMC which requires that lighting be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties.

Likewise, given City design regulations and design review by the Architectural Review Board, cumulative projects are not expected to include the use of highly reflective materials that could produce notable glare effects. Therefore, the Project would not result in significant cumulative light and glare impacts.

This analysis is provided for informational purposes only since impacts are considered less than significant pursuant to PRC Section 21099(d)(1).

Shading

The nearest cumulative project in the Project vicinity that could produce cumulative shading effects is at 2225 Broadway adjacent to the east of the S2 Site. Based on the location and height of this project (at 35 feet) as well as the Project's maximum height of 35 feet, it is not anticipated that cumulative shading effects would occur on nearby sensitive uses.

4.1.5 Mitigation Measures

Pursuant to PRC Section 21099(d)(1) and as reflected in the informational analysis presented above, the Project would not have a significant impact on Aesthetics, therefore, no mitigation measures are required.

4.1.6 Level of Significance After Mitigation

As discussed above, this analysis is provided for informational purposes only. The aesthetics effects of the Project are not considered significant pursuant to PRC Section 21099(d)(1).

4.2 Air Quality

4.2.1 Introduction

This section analyzes the air quality impacts that could occur during construction and operation of the Project. The analysis addresses consistency of the Project with the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP). The analysis of Project-generated air emissions focuses on whether the Project would cause an exceedance of an air quality standard established by the SCAQMD. Details regarding the air quality emission calculations are provided in emission modeling worksheets provided in Appendix B of this EIR.

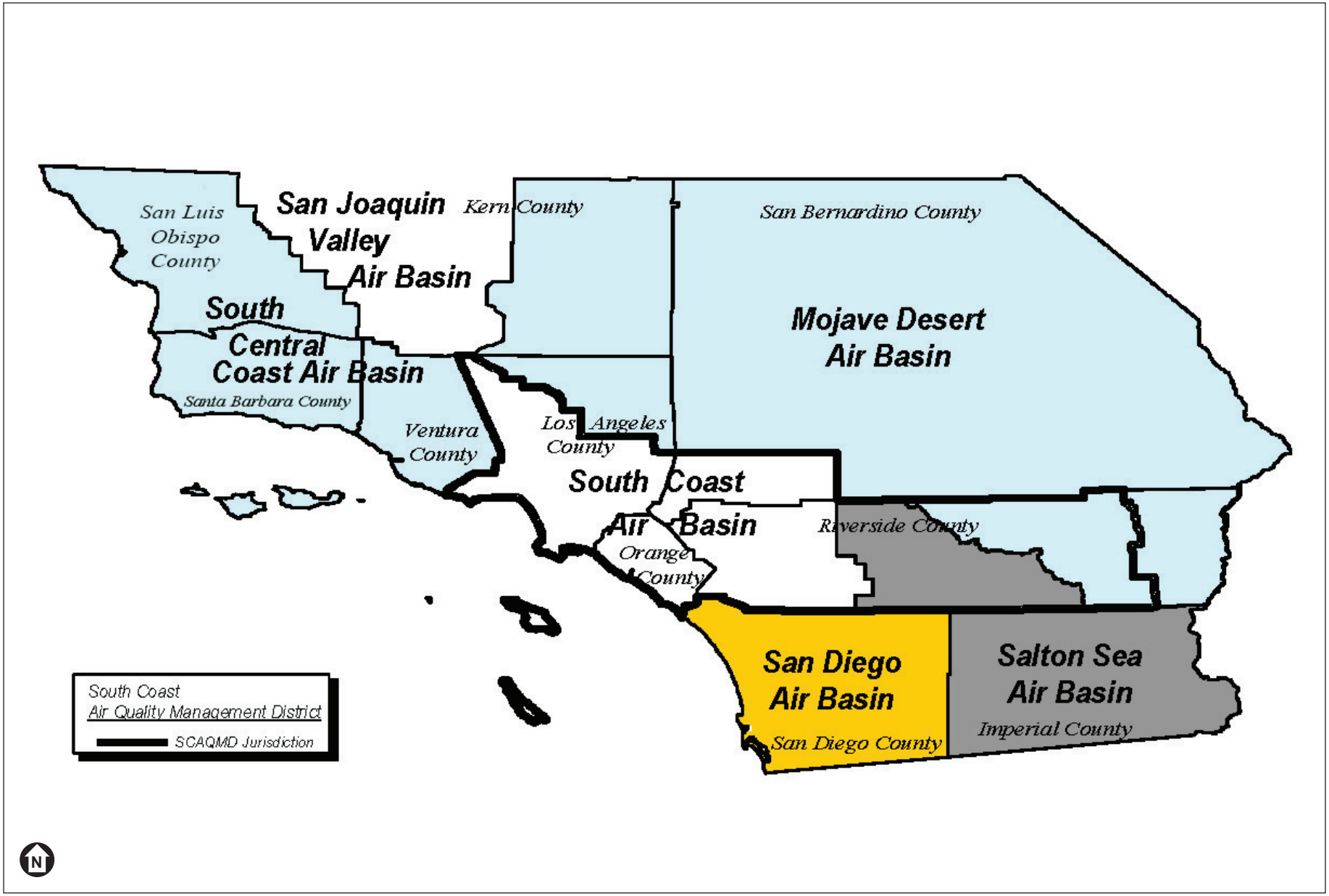
4.2.2 Environmental Setting

4.2.2.1 Regional Context

Meteorological and Air Basin Conditions

The Project Site is located within the South Coast Air Basin (Air Basin), which is shown in **Figure 4.2-1**, *Boundaries of the South Coast Air Quality Management District and Federal Planning Areas*. The Air Basin is an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Air Basin consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside counties, in addition to the San Gorgonio Pass area in Riverside County. The terrain and geographical location determine the distinctive climate of the Air Basin, as it is a coastal plain with connecting broad valleys and low hills.

The Air Basin lies in the semi-permanent high-pressure zone of the eastern Pacific Ocean. The usually mild climatological pattern is interrupted by periods of hot weather, winter storms, or Santa Ana winds. The extent and severity of pollutant concentrations in the Air Basin is a function of the area's natural physical characteristics (weather and topography) and man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Air Basin, making it an area of high pollution potential. The Air Basin's meteorological conditions, in combination with regional topography, are conducive to the formation and retention of ozone, which is a secondary pollutant that forms through photochemical reactions in the atmosphere. Thus, the greatest air pollution impacts throughout the Air Basin typically occur from June through September. This condition is generally attributed to the emissions occurring in the Air Basin, light winds, and shallow vertical atmospheric mixing. These factors reduce the potential for pollutant dispersion causing elevated air pollutant levels. Pollutant concentrations in the Air Basin vary with location, season, and time of day. Concentrations of ozone, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Air Basin and adjacent desert.



SOURCE: South Coast Air Quality Management District

Providence Saint John's Health Center Phase II Project

Figure 4.2-1
Boundaries of the South Coast Air Quality Management District and Federal Planning Areas

ESA

Criteria Pollutants and Effects

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality. The following pollutants are regulated by the United States Environmental Protection Agency (USEPA) and are subject to emissions control requirements adopted by federal, state and local regulatory agencies. These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted for them. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) for each of the criteria air pollutants and their effects on health are summarized in **Table 4.2-1,** *Ambient Air Quality Standards*. NAAQS and CAAQS have been set at levels considered safe to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. A brief description of the health effects of these criteria air pollutants are provided below.

Ozone (O_3). Ozone is a secondary pollutant formed by the chemical reaction of volatile organic compounds (VOCs) and nitrogen oxides (NO_X) in the presence of sunlight under favorable meteorological conditions, such as high temperature and stagnation episodes. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. According to the USEPA, ozone can cause the muscles in the airways to constrict potentially leading to wheezing and shortness of breath (USEPA 2018a). Ozone can make it more difficult to breathe deeply and vigorously; cause shortness of breath and pain when taking a deep breath; cause coughing and sore or scratchy throat; inflame and damage the airways; aggravate lung diseases such as asthma, emphysema and chronic bronchitis; increase the frequency of asthma attacks; make the lungs more susceptible to infection; continue to damage the lungs even when the symptoms have disappeared; and cause chronic obstructive pulmonary disease (USEPA 2018a). Long-term exposure to ozone is linked to aggravation of asthma, and is likely to be one of many causes of asthma development and long-term exposures to higher concentrations of ozone may also be linked to permanent lung damage, such as abnormal lung development in children (USEPA 2018a). According to CARB, inhalation of ozone causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms and exposure to ozone can reduce the volume of air that the lungs breathe in and cause shortness of breath (CARB 2018a). The USEPA states that people most at risk from breathing air containing ozone include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers (USEPA 2018a). Children are at greatest risk from exposure to ozone because their lungs are still developing and they are more likely to be active outdoors when ozone levels are high, which increases their exposure (USEPA 2018a). According to CARB, studies show that children are no more or less likely to suffer harmful effects than adults; however, children and teens may be more susceptible to ozone and other pollutants because they spend nearly twice as much time outdoors and engaged in vigorous activities compared to adults (CARB 2018a). Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults and are less likely than adults to notice their own symptoms and avoid harmful

exposures (CARB 2018a). Further research may be able to better distinguish between health effects in children and adults (CARB 2018a).

TABLE 4.2-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	Average Time	California Standards [a]		National Standards [b]		
		Concentration [c]	Method [d]	Primary [c, e]	Secondary [c, f]	Method [g]
O_3 [h]	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)		
NO_2 [i]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemi-luminescence	100 ppb (188 µg/m^3)	None	Gas Phase Chemi-luminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		53 ppb (100 µg/m^3)	Same as Primary Standard	
CO	1 Hour	20 ppm (23 mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m^3)	None	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10mg/m^3)		9 ppm (10 mg/m^3)		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		—	—	
SO_2 [j]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	—	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)[9]
	3 Hour	—		—	0.5 ppm (1300 µg/m^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for certain areas) [j]	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas) [j]	—	
PM10 [k]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		—		
PM2.5 [k]	24 Hour	No Separate State Standard		35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	12.0 µg/m^3 [k]	15 µg/m^3	

Pollutant	Average Time	California Standards [a]		National Standards [b]		
		Concentration [c]	Method [d]	Primary [c, e]	Secondary [c, f]	Method [g]
Lead [l, m]	30 Day Average	1.5 µg/m^3	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m^3 (for certain areas) [m]	Same as Primary Standard	
	Rolling 3-Month Average [m]	--		0.15 µg/m^3		
Visibility Reducing Particles [n]	8 Hour	Extinction coefficient of 0.23 per kilometer — visibility of ten miles or more (0.07 — 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		**No Federal Standards**		
Sulfates (SO_4)	24 Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride [l]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			

[a] California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[b] National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 micrograms/per cubic meter (µg/m^3) is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

[c] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[d] Any equivalent procedure which can be shown to the satisfaction of CARB to give equivalent results at or near the level of the air quality standard may be used.

[e] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[f] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[g] Reference method as described by the USEPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the USEPA.

[h] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[i] To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb.

[j] On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated non-attainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

[k] On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 µg/m^3 to 12.0 µg/m^3.

[l] CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[m] The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas

Pollutant	Average Time	California Standards [a]		National Standards [b]		
		Concentration [c]	Method [d]	Primary [c, e]	Secondary [c, f]	Method [g]

designated non-attainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

[n] In 1989, CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

Source: California Air Resources Board, Ambient Air Quality Standards (5/4/16), http://www.arb.ca.gov/research/aaqs/aaqs2.pdf. Accessed September 2018.

Volatile Organic Compounds (VOCs). VOCs are organic chemical compounds of carbon and are not "criteria" pollutants themselves; however, they contribute with NO_X to form ozone, and are regulated to prevent the formation of ozone (USEPA 2017a). According to CARB, some VOCs are highly reactive and play a critical role in the formation of ozone, other VOCs have adverse health effects, and in some cases, VOCs can be both highly reactive and have adverse health effects (CARB 2016a). VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and consumer products (e.g., architectural coatings, etc.) (CARB 2016a).

Nitrogen Dioxide (NO_2) and Nitrogen Oxides (NOx). NO_X is a term that refers to a group of compounds containing nitrogen and oxygen. The primary compounds of air quality concern include NO_2 and nitric oxide (NO). Ambient air quality standards have been promulgated for NO_2, which is a reddish-brown, reactive gas (CARB 2018b). The principle form of NO_X produced by combustion is NO, but NO reacts quickly in the atmosphere to form NO_2, creating the mixture of NO and NO_2 referred to as NO_X (CARB 2018b). Major sources of NO_X include emissions from cars, trucks and buses, power plants, and off-road equipment (USEPA 2018b). The terms NO_X and NO_2 are sometimes used interchangeably. However, the term NO_X is typically used when discussing emissions, usually from combustion-related activities, and the term NO_2 is typically used when discussing ambient air quality standards. Where NO_X emissions are discussed in the context of the thresholds of significance or impact analyses, the discussions are based on the conservative assumption that all NO_X emissions would oxidize in the atmosphere to form NO_2. According to the USEPA, short-term exposures to NO_2 can potentially aggravate respiratory diseases, particularly asthma, leading to respiratory symptoms (such as coughing, wheezing or difficulty breathing), hospital admissions and visits to emergency rooms while longer exposures to elevated concentrations of NO_2 may contribute to the development of asthma and potentially increase susceptibility to respiratory infections (USEPA 2018b). According to CARB, controlled human exposure studies that show that NO_2 exposure can intensify responses to allergens in allergic asthmatics (CARB 2018b). In addition, a number of epidemiological studies have demonstrated associations between NO_2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses (CARB 2018b). Infants and children are particularly at risk from exposure to NO_2 because they have disproportionately higher exposure to NO_2 than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration while in adults, the greatest risk is to people who have chronic respiratory diseases, such

as asthma and chronic obstructive pulmonary disease (CARB 2018b). CARB states that much of the information on distribution in air, human exposure and dose, and health effects is specifically for NO_2 and there is only limited information for NO and NO_X, as well as large uncertainty in relating health effects to NO or NO_X exposure (CARB 2018b).

Carbon Monoxide (CO): Carbon monoxide (CO) is primarily emitted from combustion processes and motor vehicles due to the incomplete combustion of fuel, such as natural gas, gasoline, or wood, with the majority of outdoor CO emissions from mobile sources (CARB 2018c). According to the USEPA, breathing air with a high concentration of CO reduces the amount of oxygen that can be transported in the blood stream to critical organs like the heart and brain and at very high levels, which are possible indoors or in other enclosed environments, CO can cause dizziness, confusion, unconsciousness and death (USEPA 2018c). Very high levels of CO are not likely to occur outdoors; however, when CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease since these people already have a reduced ability for getting oxygenated blood to their hearts and are especially vulnerable to the effects of CO when exercising or under increased stress (USEPA 2018c). In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain also known as angina (USEPA 2018c). According to CARB, the most common effects of CO exposure are fatigue, headaches, confusion, and dizziness due to inadequate oxygen delivery to the brain (CARB 2018c). For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress; inadequate oxygen delivery to the heart muscle leads to chest pain and decreased exercise tolerance (CARB 2018c). Unborn babies, infants, elderly people, and people with anemia or with a history of heart or respiratory disease are most likely to experience health effects with exposure to elevated levels of CO (CARB 2018c).

Sulfur Dioxide (SO_2). According to the USEPA, the largest source of sulfur dioxide (SO_2) emissions in the atmosphere is the burning of fossil fuels by power plants and other industrial facilities while smaller sources of SO_2 emissions include industrial processes such as extracting metal from ore; natural sources such as volcanoes; and locomotives, ships and other vehicles and heavy equipment that burn fuel with a high sulfur content (USEPA 2018d). In 2006, California phased-in the ultra-low-sulfur diesel regulation limiting vehicle diesel fuel to a sulfur content not exceeding 15 parts per million, down from the previous requirement of 500 parts per million, substantially reducing emissions of sulfur from diesel combustion (CARB 2004). According to the USEPA, short-term exposures to SO_2 can harm the human respiratory system and make breathing difficult (USEPA 2018d). According to CARB, health effects at levels near the State one-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation such as wheezing, shortness of breath and chest tightness, especially during exercise or physical activity and exposure at elevated levels of SO_2 (above 1 ppm) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of mortality (CARB 2018d). Children, the elderly, and those with asthma, cardiovascular disease, or chronic lung disease (such as bronchitis or emphysema) are most likely to experience the adverse effects of SO_2 (CARB 2018d, USEPA 2018d).

Particulate Matter (PM10 and PM2.5). Particulate matter air pollution is a mixture of solid particles and liquid droplets found in the air (USEPA 2018e). Some particles, such as dust, dirt, soot, or smoke, are large or dark enough to be seen with the naked eye while other particles are so small they can only be detected using an electron microscope (USEPA 2018e). Particles are defined by their diameter for air quality regulatory purposes: inhalable particles with diameters that are generally 10 micrometers and smaller (PM10); and fine inhalable particles with diameters that are generally 2.5 micrometers and smaller (PM2.5) (USEPA 2018e). Thus, PM2.5 comprises a portion or a subset of PM10. Sources of PM10 emissions include dust from construction sites, landfills and agriculture, wildfires and brush/waste burning, industrial sources, and wind-blown dust from open lands (CARB 2017a). Sources of PM2.5 emissions include combustion of gasoline, oil, diesel fuel, or wood (CARB 2017a). PM10 and PM2.5 may be either directly emitted from sources (primary particles) or formed in the atmosphere through chemical reactions of gases (secondary particles) such as SO_2, NO_X, and certain organic compounds (CARB 2017a). According to CARB, both PM10 and PM2.5 can be inhaled, with some depositing throughout the airways; PM10 is more likely to deposit on the surfaces of the larger airways of the upper region of the lung while PM2.5 is more likely to travel into and deposit on the surface of the deeper parts of the lung, which can induce tissue damage, and lung inflammation (CARB 2017a). Short-term (up to 24 hours duration) exposure to PM10 has been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits (CARB 2017a). The effects of long-term (months or years) exposure to PM10 are less clear, although studies suggest a link between long-term PM10 exposure and respiratory mortality. The International Agency for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer (CARB 2017a). Short-term exposure to PM2.5 has been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days and long-term exposure to PM2.5 has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children (CARB 2017a). According to CARB, populations most likely to experience adverse health effects with exposure to PM10 and PM2.5 include older adults with chronic heart or lung disease, children, and asthmatics and children and infants are more susceptible to harm from inhaling pollutants such as PM10 and PM2.5 compared to healthy adults because they inhale more air per pound of body weight than do adults, spend more time outdoors, and have developing immune systems (CARB 2017a).

Lead (Pb). Major sources of lead emissions include ore and metals processing, piston-engine aircraft operating on leaded aviation fuel, waste incinerators, utilities, and lead-acid battery manufacturers (USEPA 2018f). In the past, leaded gasoline was a major source of lead emissions; however, the removal of lead from gasoline has resulted in a decrease of lead in the air by 98 percent between 1980 and 2014 (USEPA 2018f). Lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems and the cardiovascular system, and affects the oxygen carrying capacity of blood (USEPA 2018f). The lead effects most commonly encountered in current populations are neurological effects in children, such as behavioral problems and reduced intelligence, anemia, and liver or kidney damage (CARB 2018e). Excessive lead exposure in adults can cause reproductive problems in men and women, high blood pressure,

kidney disease, digestive problems, nerve disorders, memory and concentration problems, and muscle and joint pain (CARB 2018e).

Air Toxics

In addition to criteria pollutants, the SCAQMD periodically assesses levels of toxic air contaminants (TACs) in the Air Basin. A TAC is defined by California Health and Safety Code Section 39655 as an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health. A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the federal act (42 U.S.C. Sec. 7412(b)) is a toxic air contaminant.

Between July 2012 and June 2013, the SCAQMD conducted the Multiple Air Toxics Exposure Study (MATES IV), which is a follow-up to previous air toxics studies conducted in the Air Basin. The MATES IV Final Report was issued in May 2015. The study, based on actual monitored data throughout the Air Basin, consisted of several elements. These included a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize carcinogenic risk across the Air Basin from exposure to TACs. The study concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Air Basin equates to a background cancer risk of approximately 418 per million based on the average of 10 fixed monitoring sites and 367 per million based on a population-weighted average risk (SCAQMD 2015a). The risk is primarily due to diesel exhaust, which is about 65 percent lower for the average of 10 fixed monitoring sites and 57 percent lower for the population-weighted risk than the previous MATES III cancer risk (SCAQMD 2015a). Subsequent to the SCAQMD's risk calculations estimates performed for MATES IV, the California Environmental Protection Agency Office of Environmental Health Hazard Assessment (OEHHA) updated the methods for estimating cancer risks (OEHHA 2015). The updated method uses higher estimates of cancer potency during early life exposures and uses different assumptions for breathing rates and length of residential exposures. When combined together, SCAQMD staff estimates that risks for the same inhalation exposure level will be about 2.5 to 2.7 times higher using the updated methods. This would be reflected in the average lifetime air toxics risk estimated from the monitoring sites data going from 418 per million to 1,023 per million (SCAQMD 2015a). Under the updated OEHHA methodology, adopted in March of 2015, the relative reduction in risk from the MATES IV results compared to MATES III would be the same (about 65 percent).

Approximately 68 percent of the risk is attributed to diesel particulate emissions, approximately 22 percent to other toxics associated with mobile sources (including benzene, butadiene, and formaldehyde), and approximately 10 percent of all airborne carcinogenic risk is attributed to stationary sources (which include industries and other certain businesses, such as dry cleaners and chrome plating operations) (SCAQMD 2015a). The study also found lower ambient concentrations of most of the measured air toxics compared to the levels measured in the previous study conducted during 2004 and 2006. Specifically, benzene and 1,3-butadiene, pollutants generated mainly from vehicles, were down 35 percent and 11 percent, respectively (SCAQMD 2015a). The reductions were attributed to air quality control regulations and improved emission control technologies. In addition to air toxics, MATES IV included continuous measurements of black carbon and ultrafine particles (particles smaller than 0.1 microns in size), which are emitted by combustion of diesel

fuels. Sampling sites located near heavily-trafficked freeways or near industrial areas were characterized by increased levels of black carbon and ultrafine particles compared to more rural sites.

As part of the MATES IV, the SCAQMD prepared maps that show regional trends in estimated outdoor inhalation cancer risk from toxic emissions, as part of an ongoing effort to provide insight into relative risks. The maps represent the estimated number of potential cancers per million people associated with a lifetime of breathing air toxics (24 hours per day outdoors for 70 years). Although it is highly unlikely an individual would remain in an area for such a duration, the assumptions used in the MATES study are health protective estimates and use conservative parameters which can result in an overestimation of a cancer risk. The grids in which the Project Site is located are shown in **Figure 4.2-2,** *Background Inhalation Cancer Risk for Project Site Area*. As shown, the background potential cancer risk per million people using the update OEHHA methodology is estimated at 975 to 1,114 per million (compared to an overall South Coast Air Basin-wide risk of 1,023 per million) (SCAQMD 2015b). Generally, the risk from air toxics is lower near the coastline: it increases inland, with higher risks concentrated near diesel sources (e.g., freeways, airports, and ports).

Existing Criteria Pollutants Levels at Nearby Monitoring Stations

The SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin to measure ambient pollutant concentrations. The monitoring station most representative of the Project Site is the Northwest Coastal LA County monitoring station, located in west Los Angeles at the Veteran Affairs Medical Center. Criteria pollutants monitored at this station include ozone, NO_2, and CO. Because this station does not monitor SO_2, PM10, PM2.5, or lead, data from the Southwest Coastal LA County monitoring station was used for SO_2, PM10, and lead, and data from the Central LA monitoring station was used for PM2.5. The most recent data available from the SCAQMD for these monitoring stations are from years 2012 to 2016. The pollutant concentration data for these years are summarized in **Table 4.2-2,** *Ambient Air Quality Data*.

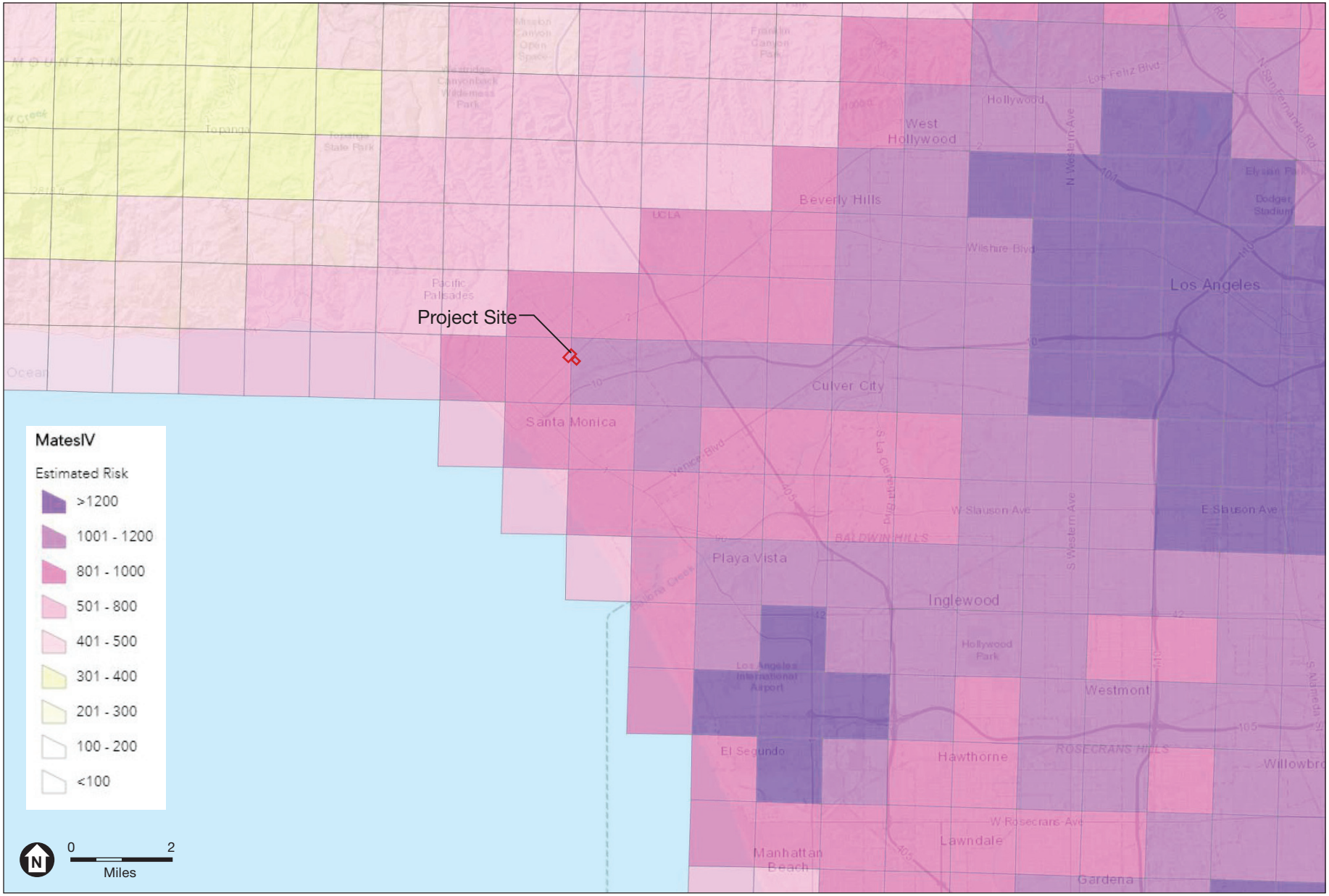
4.2.2.2 Existing Conditions

Existing Sites & Emissions

Site 2C

Site 2C is currently developed as a paved surface parking lot (West Lot) along Santa Monica Boulevard. Site 2C includes a landscaped area to the north of the West Lot, along the perimeter of the West Lot, and within the West Lot. Although site 2C consists primarily of a paved surface parking lot and does not itself generate air pollutant emissions, maintenance of the landscaped areas would generate air pollutant emissions.[1]

[1] Although cars in the parking lot generate emissions, the emissions are attributed to the associated land use that visitors are traveling to and not the parking lot itself.



SOURCE: South Coast Air Quality Management District, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.2-2
Background Inhalation Cancer Risk for Project Area

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TABLE 4.2-2
AMBIENT AIR QUALITY DATA

Pollutant/Standard	2012	2013	2014	2015	2016
Northwest Coastal LA County Monitoring Station (O_3, NO_2, CO)					
O_3 (1-hour)					
Maximum Concentration (ppm)	0.093	0.088	0.116	0.102	0.085
Days > CAAQS (0.09 ppm)	0	0	1	2	0
O_3 (8-hour)					
Maximum Concentration (ppm)	0.073	0.075	0.094	0.072	0.073
4th High 8-hour Concentration (ppm)	0.065	0.059	0.077	0.069	0.066
Days > CAAQS (0.070 ppm)	1	1	6	3	2
Days > NAAQS (0.070 ppm)	1	1	5	2	2
NO_2 (1-hour)					
Maximum Concentration (ppm)	0.061	0.051	0.064	0.068	0.055
98th Percentile Concentration (ppm)	0.054	0.049	0.054	0.049	0.049
NO_2 (Annual)					
Annual Arithmetic Mean (0.030 ppm)	0.014	0.015	0.013	0.012	0.012
CO (1-hour)					
Maximum Concentration (ppm)	2.1	1.9	2	1.6	2.2
CO (8-hour)					
Maximum Concentration (ppm)	1.4	1.3	1.3	1.4	1.1
Southwest Coastal LA County Monitoring Station (SO_2, PM10, lead)					
SO_2 (1-hour)					
Maximum Concentration (ppm)	0.005	0.010	0.015	0.015	0.010
99th Percentile Concentration (ppm)	0.005	0.007	0.009	0.007	0.006
PM10 (24-hour)					
Maximum Concentration (µg/m^3)	31	38	46	42	43
Samples > CAAQS (50 µg/m^3)	0	0	0	0	0
Samples > NAAQS (150 µg/m^3)	0	0	0	0	0
PM10 (Annual Average)					
Annual Arithmetic Mean (20 µg/m^3)	19.8	20.8	22.0	21.2	21.6
Lead					
Maximum 30-day average (µg/m^3)	0.005	0.005	0.008	0.008	0.006
Central LA County Monitoring Station (PM2.5)					
PM2.5 (24-hour)					
Maximum Concentration (µg/m^3)	58.7	43.1	59.9	56.4	44.4
98th Percentile Concentration (µg/m^3)	31.8	29.0	34.5	38.0	27.3
Samples > NAAQS (35 µg/m^3)	4	1	6	7	2
PM2.5 (Annual)					
Annual Arithmetic Mean (12 µg/m^3)	12.55	11.95	12.36	12.38	11.83

Notes: ppm = parts per million; µg/m^3 = micrograms per cubic meter

SOURCES: South Coast Air Quality Management District, Historical Data by Year, http://www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year. Accessed September 2018; California Air Resources Board, Air Quality Data Statistics, http://www.arb.ca.gov/adam/. Accessed September 2018; U.S. Environmental Protection Agency, AirData, http://www.epa.gov/airdata/ad_rep_mon.html. Accessed September 2018.

Site 2D/E and Mullin Plaza

Site 2D/E is currently developed with a surface parking lot (Lot C) and a one to two-story, 10,800 square foot concrete office building. The parking lot itself does not generate air pollutant emissions; however, operation of the onsite building is a source of air pollutant emissions.

The Mullin Plaza site is currently developed with open space, landscaped areas, and driveways as the main vehicular access to the PSJHC from Santa Monica Boulevard. Maintenance of the landscaped areas generate air pollutant emissions.

Site 2I

Site 2I is currently developed with the existing Child & Family Development Center, which consists of a two-story 34,670 square foot commercial building and a one-story, 585 square-foot pool house. Operation of the onsite building is a source of air pollutant emissions.

Sites S1 & S3

The S1 and S3 Sites are currently developed with surface parking lots (Lot B and Lot I) and two temporary modular buildings totaling 2,675 square feet for the PSJHC MRI facilities. Operation of the onsite buildings is a source of air pollutant emissions.

Site S2

Site S2 is developed with a portion of a surface parking lot (Lot H) that is used by PSJHC. The parking lot itself does not generate air pollutant emissions.

Site S4

Site S4 is currently developed with the John Wayne Cancer Institute Building, a vacant ten-unit multifamily apartment building, and a paved surface parking lot (a portion of Lot H). The John Wayne Cancer Institute Building has approximately 51,055 square feet of floor area located within two above-grade stories and one subterranean level. The parking lot itself does not generate air pollutant emissions; however, operation of the John Wayne Cancer Institute is a source of air pollutant emissions.

Site S5

Site S5 is currently with a surface parking lot (a portion of Lot H). The parking lot itself does not generate air pollutant emissions.

As discussed above, various areas of the Project Site are currently developed. As part of the Project, portions of the developed areas would be removed, thus the emissions associated with these developments would be removed and would be applied as a credit to the Project's emissions resulting in net emissions (Project minus Existing). **Table 4.2-3**, *Existing Site Emissions to be Removed (Pounds Per Day)*, shows the regional and localized emissions from the existing development to be removed.

TABLE 4.2-3
EXISTING SITE EMISSIONS TO BE REMOVED (POUNDS PER DAY) [A]

Source	VOC	NO_X	CO	SO_2	PM10	PM2.5
Existing Regional Emissions						
Area (Consumer Products, Landscaping)	2	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	1	1	<1	<1	<1
Motor Vehicles	2	11	30	<1	7	2
Stationary (Emergency Generator)	<1	2	2	<1	<1	<1
Total Regional Existing Emissions	**4**	**14**	**33**	**<1**	**7**	**2**
Existing Localized Emissions						
Area (Consumer Products, Landscaping)	--	<1	<1	--	<1	<1
Energy (Natural Gas)	--	1	1	--	<1	<1
Stationary (Emergency Generator)	--	2	2	--	<1	<1
Total Localized Existing Emissions	--	**3**	**3**	--	**<1**	**<1**

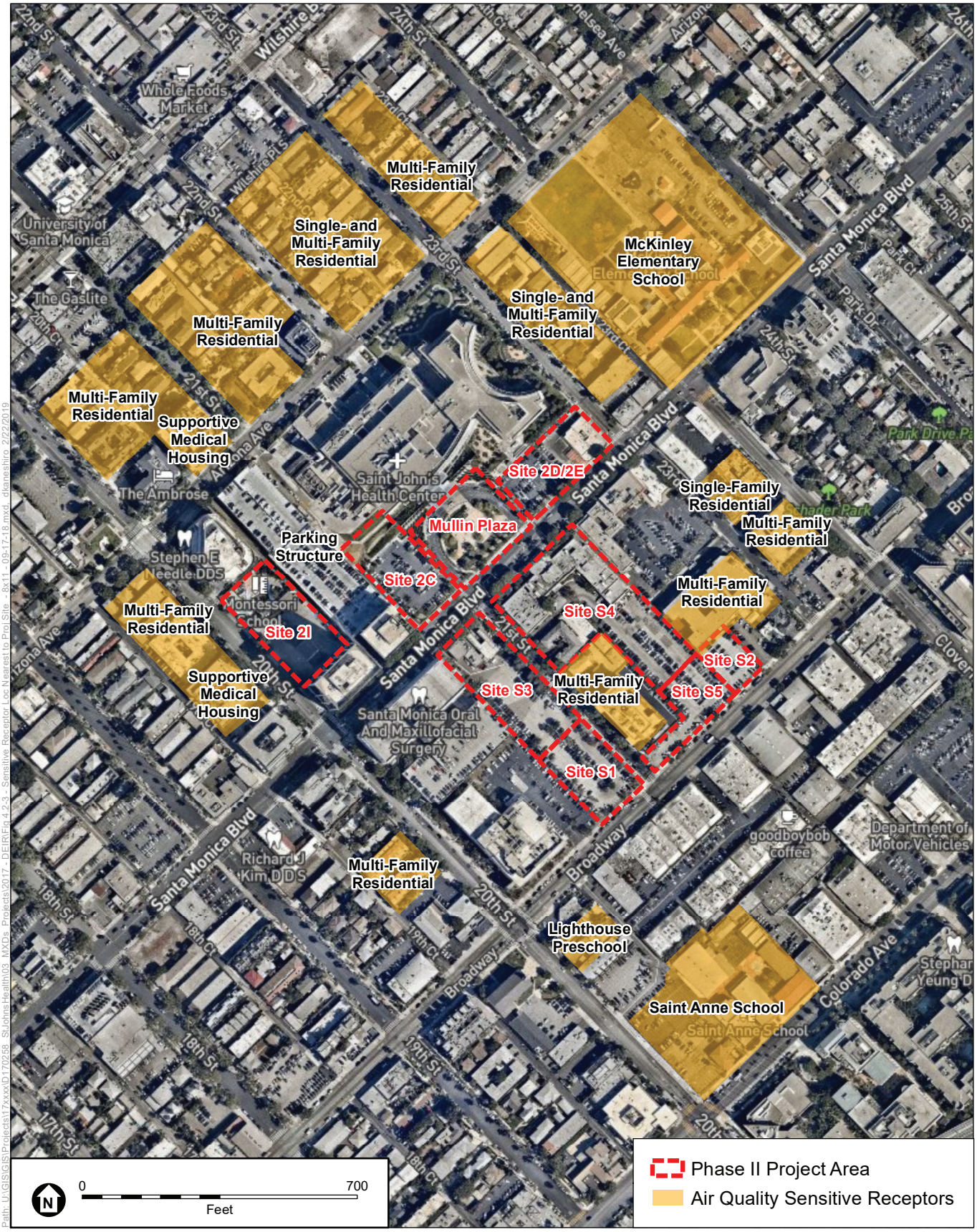
NOTES:
[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.
SOURCE: ESA, 2019.

Sensitive Receptors

Sensitive receptors are certain population groups, which are considered more sensitive to the potential effects of air pollution than others. Sensitive receptors include children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases). Sensitive receptors that are not owned PSHC within 500 feet of the Project Site are shown in **Figure 4.2-3,** *Sensitive Receptor Locations Nearest to the Project Site*, and include the following:

- Residential Dwellings: Low-rise single-family homes are interspersed with multi-family residential buildings in the Project vicinity. Residential uses are located immediately adjacent to the north and approximately 60-200 feet northeast of Site S2, approximately 50-300 feet northeast of Site 2D/E, approximately 640 feet north of Site 2C and Mullin Plaza, and approximately 90 feet west and 350 feet north of Site 2I.
- Senior Living Facilities: Geneva Plaza, a senior living residential complex (1441 21st Street) lies in the South Campus, encircled by Sites S1, S3, S4, and S5. Specifically, this building is located immediately adjacent and west of Site S5, approximately 40 feet northeast of Site S1, 70 feet to the east of Site S3, and immediately southeast of Site S4. The Rehabilitation Center of Santa Monica (1338 20th Street) and the Santa Monica Health Care Center (1320 20th Street) are located approximately 70 feet to the southwest of Site 2I and 380 feet to the southwest of Site 2C.
- Schools: McKinley Elementary School is located approximately 210 feet northeast of Site 2D/E. Lighthouse Preschool is located approximately 230 feet southwest of Site S1. Saint Anne School is located approximately 425 feet southwest of Site S1.

The receptors listed above would also be exposed to operational TAC emissions, but as discussed below, operational TACs are expected to be minor and operational health risks are discussed qualitatively in this document.



SOURCE: OpenStreetMap, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.2-3
Sensitive Receptor Locations Nearest to the Project Site

ESA

All other air quality sensitive receptors not listed above are located at greater distances from the Project Site, and would be less impacted by Project emissions. Accordingly, impacts are quantified for the above sensitive receptors to assess worse case air quality impacts.

4.2.3 Regulatory Framework

A number of statutes, regulations, plans, and policies have been adopted at the federal, state, and local levels that address air quality issues. This section provides a summary of pertinent air quality regulations affecting the Project at the federal, state, and local levels.

4.2.3.1 Federal

Clean Air Act

The federal Clean Air Act governs air quality in the United States. The USEPA is responsible for implementation and enforcement of the Clean Air Act. The Clean Air Act establishes federal NAAQS and specifies future dates for achieving compliance. It also requires the USEPA to designate areas as attainment, nonattainment, or maintenance. The Clean Air Act also mandates that the state submit and implement a State Implementation Plan (SIP) for each criteria pollutant if the NAAQS for the pollutant has not been achieved. The SIP includes pollution control measures that demonstrate how the standards will be met. The sections of the Clean Air Act which are most applicable to the Project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions). Title I requirements are implemented for the purpose of attaining NAAQS for the following criteria pollutants: O_3; NO_2; CO; SO_2; PM10; and Pb. The NAAQS were amended in July 1997 to include an 8-hour standard for O_3 and to adopt a NAAQS for PM2.5. The NAAQS were also amended in September 2006 to include an established methodology for calculating PM2.5 as well as revoking the annual PM10 threshold.

Table 4.2-1 above shows the NAAQS currently in effect for each criteria pollutant. **Table 4.2-4**, *South Coast Air Basin Attainment Status (Los Angeles County)*, shows the attainment status of the Air Basin for each criteria pollutant. As shown in Table 4.2-4, the Air Basin is currently in nonattainment of NAAQS for O_3, PM2.5, and in one area of the Air Basin for Pb.

In addition to criteria pollutants, Title I also includes air toxics provisions which require the USEPA to develop and enforce regulations to protect the public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with Section 112, the USEPA establishes National Emission Standards for Hazardous Air Pollutants (NESHAPs). The list of hazardous air pollutants (HAPs), or air toxics, includes specific compounds that are known or suspected to cause cancer or other serious health effects.

Title II requirements pertain to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline, automobile pollution control devices, and vapor recovery nozzles on gas pumps are a few of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles which have strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially, and the specification requirements for cleaner burning gasoline are more stringent.

TABLE 4.2-4
SOUTH COAST AIR BASIN ATTAINMENT STATUS (LOS ANGELES COUNTY)

Pollutant	National Standards	California Standards
O_3 (1-hour standard)	N/A [a]	Non-attainment
O_3 (8-hour standard)	Non-attainment – Extreme	Non-attainment
CO	Attainment	Attainment
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
PM10	Attainment	Non-attainment
PM2.5	Non-attainment – Serious	Non-attainment
Lead	Non-attainment (Partial) [b]	Attainment
Visibility Reducing Particles	N/A	Unclassified
Sulfates	N/A	Attainment
Hydrogen Sulfide	N/A	Unclassified
Vinyl Chloride	N/A	N/A [c]

N/A = not applicable

[a] The NAAQS for 1-hour ozone was revoked on June 15, 2005, for all areas except Early Action Compact areas.

[b] Partial Nonattainment designation – Los Angeles County portion of the Air Basin only for near-source monitors.

[c] In 1990, CARB identified vinyl chloride as a toxic air contaminant and determined that it does not have an identifiable threshold. Therefore, CARB does not monitor or make status designations for this pollutant.

SOURCE: United States Environmental Protection Agency, The Green Book Non-attainment Areas for Criteria Pollutants, https://www.epa.gov/green-book. Accessed September 2018; California Air Resources Board, Area Designations Maps/State and National, http://www.arb.ca.gov/desig/adm/adm.htm. Accessed September 2018.

4.2.3.2 State

California Clean Air Act

The California Clean Air Act, signed into law in 1988, requires all areas of the State to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practical date. The CAAQS apply to the same criteria pollutants as the federal Clean Air Act but also include state-identified criteria pollutants, which include sulfates, visibility-reducing particles, hydrogen sulfide, and vinyl chloride. CARB has primary responsibility for ensuring the implementation of the California Clean Air Act, responding to the federal Clean Air Act planning requirements applicable to the state, and regulating emissions from motor vehicles and consumer products within the state. Table 4.2-1 shows the CAAQS currently in effect for each of the criteria pollutants as well as the other pollutants recognized by the state. As shown in Table 4.2-1, the CAAQS include more stringent standards than the NAAQS for most of the criteria air pollutants.

Health and Safety Code Section 39607(e) requires CARB to establish and periodically review area designation criteria. Table 4.2-3 provides a summary of the attainment status of the Los Angeles County portion of the Air Basin with respect to the state standards. The Air Basin is designated as attainment for the California standards for sulfates and unclassified for hydrogen sulfide and

visibility-reducing particles. Because vinyl chloride is a carcinogenic toxic air contaminant, CARB does not classify attainment status for this pollutant.

California Air Resources Board On-Road and Off-Road Vehicle Rules

In 2004, CARB adopted an Airborne Toxic Control Measure (ATCM) to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to DPM and other TACs (Title 13 California Code of Regulations [CCR], Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given time.

In 2008, CARB also approved the Truck and Bus regulation to reduce PM and NO_X emissions from existing diesel vehicles operating in California (13 CCR, Section 2025). The requirements were amended to apply to nearly all diesel-fueled trucks and buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds. For the largest trucks in the fleet, those with a GVWR greater than 26,000 pounds, there are two methods to comply with the requirements. The first way is for the fleet owner to retrofit or replace engines, starting with the oldest engine model year, to meet 2010 engine standards, or better. This is phased over 8 years, starting in 2015 and would be fully implemented by 2023, meaning that all trucks operating in the State subject to this option would meet or exceed the 2010 engine emission standards for NO_X and PM by 2023. The second option, if chosen, requires fleet owners, starting in 2012, to retrofit a portion of their fleet with diesel particulate filters (DPFs) achieving at least 85 percent removal efficiency, so that by January 1, 2016 their entire fleet is equipped with DPFs. However, DPFs do not lower NO_X emissions. Thus, fleet owners choosing the second option must still comply with the 2010 engine emission standards for their trucks and busses by 2020.

In addition to limiting exhaust from idling trucks, CARB also promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower (hp) such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The regulation adopted by CARB on July 26, 2007 aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models (13 CCR, Section 2449). Implementation is staggered based on fleet size (which is the total of all off-road horsepower under common ownership or control), with large fleets beginning compliance in 2014, medium fleets in 2017, and small fleets in 2019. Each fleet must demonstrate compliance through one of two methods. The first option is to calculate and maintain fleet average emissions targets, which encourages the retirement or repowering of older equipment and rewards the introduction of newer cleaner units into the fleet. The second option is to meet the Best Available Control Technology (BACT) requirements by turning over or installing Verified Diesel Emission Control Strategies (VDECS) on a certain percentage of its total fleet horsepower. The compliance schedule requires that BACT turn overs or retrofits (VDECS installation) be fully implemented by 2023 in all equipment for large and medium fleets and by 2028 for small fleets.

California Air Resources Board Air Quality and Land Use Handbook

CARB published the Air Quality and Land Use Handbook in 2005 to serve as a general guide for considering impacts to sensitive receptors from facilities that emit TAC emissions. The recommendations provided therein are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions. Some examples of CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines, and (4) avoid siting sensitive receptors within 300 feet of a large gasoline dispensing facility (3.6 million gallons per year or more) or 50 feet of a typical gasoline dispensing facility (less than 3.6 million gallons per year) (CARB 2005).

In April 2017, CARB published a Technical Advisory supplement to the Air Quality and Land Use Handbook recognizing that infill developments as promoted by the State can place sensitive individuals in close proximity to high-volume roadways. The Technical Advisory provides planners and other stakeholders involved in land use planning and decision-making with information on scientifically based strategies to reduce exposure to traffic emissions near high-volume roadways. The strategies include those that reduce traffic emissions, such as vehicle speed reduction mechanisms, including roundabouts, traffic signal management, and speed limit reductions on high-speed roadways. Strategies also include those that increase the dispersion of traffic emissions, such as implementing designs that promote air flow and pollutant dispersion along street corridors (e.g., wider sidewalks, bicycle lanes, streets characterized by buildings of varying heights), solid barriers such as sound walls, and vegetation for pollutant dispersion. Other strategies include those that remove pollution from the air such as indoor high efficiency filtration. This Technical Advisory is not intended as guidance for any specific project, nor does it create any presumption regarding the feasibility of mitigation measures for purposes of compliance with CEQA (CARB 2017b).

4.2.3.3 Regional

South Coast Air Quality Management District

SCAQMD has jurisdiction over air quality planning for all of Orange County, Los Angeles County except for the Antelope Valley, the non-desert portion of western San Bernardino County, and the western and Coachella Valley portions of Riverside County. The Air Basin is a subregion within SCAQMD jurisdiction. While air quality in the Air Basin has improved, the Air Basin requires continued diligence to meet the air quality standards.

In an effort to monitor the various concentrations of air pollutants throughout the basin, SCAQMD operates monitoring stations to measure air pollutant levels for the 38 source receptor areas (SRAs) in the Air Basin. The City of Santa Monica is located within SRA 2, which covers the northwest

coastal Los Angeles County area. Ambient air pollutant concentrations within SRA 2 are monitored at the Veterans Administration building in West Los Angeles, which is approximately 6 miles west of the Project. Of the air pollutants discussed previously, only ambient concentrations of ozone, CO, and NO_2 are monitored in SRA 2. Measurements for SO_2 and PM10 were taken in SRA 3 which covers the Southwest Coastal LA County area and are monitored at the Los Angeles-Westchester Parkway monitoring station in the City of Los Angeles. Measurements for PM2.5 were taken in SRA 1 in the City of Los Angeles at the North Main Street monitoring station, as these pollutants are not measured in SRA 2 or SRA 3. The measured pollutant levels from these monitoring stations for these pollutants are provided in Table 4.2-2.

Air Quality Management Plan

The SCAQMD Governing Board adopted the 2016 Air Quality Management Plan (AQMP) in 2017 (SCAQMD 2017). CARB approved the 2016 AQMP in 2017. The AQMP provides analysis on existing and potential regulatory control options to promote criteria pollutants and toxic risk. The AQMP provides strategies for stationary and mobile sources to ensures the region can meet attainment deadlines, public health is protected to the maximum extent feasible, and to avoid sanctions for violation of attainments standards. The main objectives of the AQMP includes implementing fair-share emissions reductions strategies at the federal, state, and local levels; establishing partnerships, funding, and incentives to accelerate deployment of zero and near-zero-emissions technologies; and taking credit from co-benefits from greenhouse gas (GHG), energy, transportation and other planning efforts (SCAQMD 2017). The strategies included in the 2016 AQMP are intended to demonstrate attainment of the NAAQS for the federal non-attainment pollutants ozone and PM2.5 (SCAQMD 2016a).

The AQMP contains control measures for reducing emissions from mobile sources, with an emphasis on NOx and VOC emissions from on-road and off-road sources. Control measures with potential applicability to Project emissions associated with construction and operation include the following:

On-Road Measures

MOB-05-ACCELERATED PENETRATION OF PARTIAL ZERO-EMISSION AND ZERO-EMISSION VEHICLES: This measure proposes to continue incentives for the purchase of zero-emission vehicles and hybrid vehicles with a portion of their operation in an "all-electric range" mode. The State Clean Vehicle Rebate Pilot (CVRP) program is proposed to continue from 2016 to 2030 with proposed funding up to $5,000 per vehicle and for low-income eligible residents, additional funding of up to $1,500 for a total of $6,500 per vehicle. The California State legislature has appropriated $133 million statewide for the CVRP for Fiscal Year 2016–17. The proposed measure seeks to provide funding rebates for at least 15,000 zero-emission or partial-zero emission vehicles per year.

MOB-06-ACCELERATED RETIREMENT OF OLDER LIGHT-DUTY AND MEDIUM-DUTY VEHICLES: This proposed measure calls for promoting the permanent retirement of older eligible vehicles through financial incentives currently offered through local funding incentive programs, and AB 118 Enhanced Fleet Modernization Program (EFMP), and the Greenhouse Gas Reduction Fund (EFMP Plus-Up). The proposed measure seeks to retire up to 2,000 older light-

and medium-duty vehicles (up to 8,500 pounds GVW) per year. The proposed measure seeks to provide funding assistance for at least 2,000 replacement vehicles per year.

MOB-07-ACCELERATED PENETRATION OF PARTIAL ZERO-EMISSION AND ZERO-EMISSION LIGHTHEAVY- AND MEDIUM-HEAVY-DUTY VEHICLES: The objective of the proposed action is to accelerate the introduction of advanced hybrid and zero-emission technologies for Class 4 through 6 heavy-duty vehicles. The State is currently implementing a Hybrid Vehicle Incentives Project (HVIP) program to promote zero-emission and hybrid heavy-duty vehicles and CARB is proposing to allocate $18 million statewide to the program. Zero-emission vehicles and hybrid vehicles with a portion of their operation in an "all-electric range" mode would be given the highest priority. Also, the District staff will seek necessary legislative authority to authorize the SCAQMD to require the accelerated purchase and use of near-zero and zero-emission heavy-duty on-road vehicles for public fleets within the South Coast Basin. The District's fleet rules will be amended to require accelerated purchase and use of near-zero and zero-emission heavy-duty on-road public vehicles within the South Coast Basin no later than two years after the SCAQMD obtains any necessary legislative authority to control emissions of NOx, PM2.5, and diesel particulate matter.

MOB-08-ACCELERATED RETIREMENT OF OLDER ON-ROAD HEAVY-DUTY VEHICLES: This proposed measure seeks to replace up to 2,000 heavy-duty vehicles per year with newer or new vehicles that meet one of the optional NOx standards adopted by CARB. The funding assistance will be prorated to offer the most funding for heavy-duty engines meeting the optional NOx exhaust emissions standard of 0.02 grams per brake horsepower per hour (g/bhp-hr) or cleaner. In addition, the SCAQMD may to the extent within its authority, adopt a regulation to require purchase of the cleanest commercially available engine, which may include a provision similar to the Surplus Off-Road Opt-In for NOx (SOON) provision of the Statewide In-Use Off-Road Fleet Vehicle Regulation or develop new or expanded clean fleet vehicle rules, to ensure that additional NOx emission reduction benefits are achieved. The District staff will seek necessary legislative authority to authorize the SCAQMD to require the accelerated purchase and use of near-zero and zero-emission heavy-duty on-road vehicles for public fleets within the South Coast Basin. The District's fleet rules will be amended to require accelerated purchase and use of near-zero and zero emission heavy-duty on-road public vehicles within the South Coast Basin no later than two years after the SCAQMD obtains any necessary legislative authority to control emissions of NOx, PM2.5, and diesel particulate matter.

MOB-09-ON-ROAD MOBILE SOURCE EMISSION REDUCTION CREDIT GENERATION PROGRAM: This proposed measure seeks to accelerate deployment of near-zero and zero-emission on-road heavy-duty trucks through the generation of mobile source emission reduction credits (MSERCs) that can be used for purposes of recognizing mobile source emission reductions at facilities affected by proposed AQMP measures MOB-01 through MOB-04, MOB-08, and EGM-01. The SCAQMD staff will develop amendments to SCAQMD Rules 1612 and 1612.1 to reflect the latest advanced near-zero and zero emission technologies and revise the quantification methodologies in Rules 1612 and 1612.1. MSERCs generated will be discounted to provide additional benefits to the environment and to help meet air quality standards.

Off-Road Measures

MOB-10-EXTENSION OF THE SOON PROVISION FOR CONSTRUCTION/ INDUSTRIAL EQUIPMENT: To promote turnover (i.e., retire, replace, retrofit, or repower) of older in-use construction and industrial diesel engines, this proposed measure seeks to continue the SOON provision of the Statewide In-Use Off-Road Fleet Vehicle Regulation beyond 2023 through the 2031 timeframe. In order to implement the SOON program in this timeframe, funding of up to $30 million per year would be sought to help fund the repower or replacement of older Tier 0 and Tier 1 equipment to Tier 4 or cleaner equipment, with approximately 2 tpd of NOx reductions.

MOB-11 – EXTENDED EXCHANGE PROGRAM: This measure seeks to continue the successful lawnmower and leaf blower exchange programs in order to increase the penetration of electric equipment or new low emission gasoline-powered equipment used in the region. The proposed extended exchange program will focus on incentives to accelerate the replacement of older equipment with new Tier 4 or cleaner equipment or zero-emission equipment where applicable. In addition, other small off-road equipment (SORE) equipment may also be considered for exchange programs for accelerating the turnover of existing engines.

The AQMP also incorporates measures from the Southern California Association of Governments' (SCAG) 2016 Final Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Key objectives of the RTP/SCS are discussed further below.

While the 2016 AQMP was adopted by the SCAQMD and CARB, it has not yet received USEPA approval for inclusion in the SIP. Therefore, until such time as the 2016 AQMP is approved by USEPA, the 2012 AQMP remains the applicable AQMP.

Rules and Regulations

Several SCAQMD rules adopted to implement portions of the AQMP may apply to the proposed Project. For example, SCAQMD Rule 403 requires implementation of best available fugitive dust control measures during active construction periods capable of generating fugitive dust emissions from on-site earth-moving activities, construction/demolition activities, and construction equipment travel on paved and unpaved roads. The Project would be subject to the following SCAQMD rules and regulations:

Regulation IV – Prohibitions: This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-up/shutdown exemptions and breakdown events. The following is a list of rules which may apply to the Project:

- **Rule 401 – Visible Emissions:** This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.
- **Rule 402 – Nuisance:** This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which

endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

- **Rule 403 – Fugitive Dust:** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM10 emissions to less than 50 micrograms per cubic meter (µg/m3) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Mitigation measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Finally, a contingency plan may be required if so determined by USEPA.

Regulation XI – Source Specific Standards: Regulation XI sets emissions standards for specific sources. The following is a list of rules which may apply to the Project as a result of project construction activities (i.e. application of architectural coatings, and potential sediment and dirt being tracked onto roads), proposed restaurant uses onsite, and on-site water heaters for the proposed uses:

- **Rule 1113 – Architectural Coatings:** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.
- **Rule 1138 – Control of Emissions from Restaurant Operations:** This rule specifies emissions and odor control requirements for commercial cooking operations that use chain-driven charbroilers to cook meat.
- **Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters:** This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NO_X emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.
- **Rule 1186 – PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations:** This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM10 emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).

Regulation XIV – Toxics and Other Noncriteria Pollutants: Regulation XI sets emissions standards for TACs and other noncriteria pollutant emissions. The following is a list of rules which may apply to the Project due to the demolition of existing buildings/structures that could contain asbestos and the operation of diesel-powered generators during operations since diesel particulate matter is a TAC:

- **Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities:** This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.

- **Rule 1472 – Requirements for Facilities with Multiple Stationary Emergency Standby Diesel-Fueled Internal Combustion Engines:** This rule regulated diesel particulate matter emissions from facilities with three or more stationary emergency standby diesel-fueled internal combustion engines. Facilities which comply with all applicable requirements of Rule 1402, including emissions from diesel engines at the facility, may be exempt from this rule.

Regulation XIV – Toxics and Other Non-Criteria Pollutants: Regulation XIV sets requirements for new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants or other non-criteria pollutants. The following is a list of rules which may apply to the Project:

- **Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines:** This rule applies to stationary compression ignition engine greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.

Southern California Association of Governments

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. SCAG is the federally designated Metropolitan Planning Organization for the majority of the Southern California region and is the largest Metropolitan Planning Organization in the nation. With regard to air quality planning, SCAG adopted the 2016-2040 RTP/SCS in April 2016, which addresses regional development and growth forecasts and forms the basis for the land use and transportation control portions of the AQMP. The growth forecasts are used in the preparation of the air quality forecasts and consistency analysis included in the AQMP. The RTP/SCS and AQMP are based on projections originating within local jurisdictions.

SCAG's RTP/SCS provides specific strategies for reducing per capita passenger vehicle emissions. These strategies include supporting projects that encourage a diverse job opportunities for a variety of skills and education, recreation and culture and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles.

4.2.3.4 Local – City of Santa Monica

Local jurisdictions, such as the City of Santa Monica, have the authority and responsibility to reduce air pollution through its land use decision-making authority. Although the City's General Plan does not have an Air Quality Element, the Land Use and Circulation Element (LUCE) includes a number of Citywide goals, objectives, and policies related to reducing air pollution and GHG emissions. A number of these goals and policies are relevant to the Project and are related to traffic mobility, discouraging single-occupancy vehicle trips, encouraging bike trips, managing traffic

congestion during peak hours, and increasing energy efficiency in City facilities and private developments.

The City is also responsible for the implementation of transportation control measures as outlined in the AQMP. Through capital improvement programs, local governments can fund infrastructure that contributes to improved air quality by requiring such improvements as bus turnouts as appropriate, installation of energy-efficient streetlights, and synchronization of traffic signals. In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits and monitors and enforces implementation of such mitigation measures.

The City has developed a comprehensive set of planning documents and regulations that are intended to reduce air quality emissions. Many of these focus on broader issues pertaining to sustainability of the City and the City's contributions to reducing the generation of GHG.

General Plan Land Use and Circulation Element (LUCE)

The City's Land Use and Circulation Element (LUCE) was adopted in 2010 (last amended in 2017), and is the primary land use and transportation planning document governing existing and future land uses in the City. The LUCE encompasses the community's vision for Santa Monica's future; and establishes goals, policies, and development criteria for land uses and circulation in the City. The LUCE is intended to achieve a sustainable and integrated system of land use and transportation within the City. Its goals and policies provide the structure and tools to improve air quality within the City and reduce the generation of GHGs.

Among other features, the LUCE includes a number of goals and policies that address the overall arrangement of development in the City, creating a land use pattern that reduces vehicle miles traveled. It includes within its Citywide Land Use Policies, goals and policies that aim to reduce GHG emissions. Further, Chapter 3.1 addresses Sustainability and Climate Change and includes 10 additional goals with related policies that further address issues pertaining to reductions in the generation of GHGs.

Sustainable City Plan

The City's Sustainable City Plan (SCP) provides goals and strategies for the City to follow to enhance the City's sustainability, inclusive of reducing greenhouse gas emissions. It includes nine goal areas, four of which address the amount of air quality emissions associated with City development: Resource Conservation, Environmental and Public Health, Transportation, and Open Space and Land Use. Two of these, Transportation and Open Space/Land Use, address the overall arrangement of development in the City. These topics are addressed further in the discussion of LUCE policies below and in Section 4.11, *Land Use and Planning*, of this EIR. Development in the City per LUCE policies creates a land use pattern that reduces vehicle miles traveled, thus indirectly reducing energy consumption and the generation of greenhouse gases and criteria pollutant emissions. The SCP goals pertaining to Resource Conservation and Environment and Public Health more directly address air quality emissions. The Resource Conservation goals directly addresses such topics as use of renewable energy and reductions in air, soil and water

pollutants. The Resource Conservation Goals also set GHG emissions reduction targets for the City in order to address climate change impacts.

Other City Programs

Local jurisdictions, such as the City of Santa Monica, have the shared responsibility to help develop and implement some of the control measures of the AQMP. Transportation-related strategies for congestion management, low emission vehicle infrastructure, and transit accessibility and non-transportation-related strategies for energy conservation can be encouraged by policies of local governments.

As part of this effort, the City has several existing programs that it uses to improve health and sustainability of the community through improved regional air quality and reduced greenhouse gas emissions. These programs/regulations include:

- **Urban Forest Master Plan (UFMP)** – The revised 2017 UFMP includes a 5-year Street Tree Planting Priority Plan to increase and expand the urban forest canopy. The planting of trees would increase carbon sequestion and improve air quality. Trees remove gaseous pollutants and particulate matter from the air by absorbing them with normal air components through their leaf surface.
- **Electric Vehicle Action Plan** – The EVAP was adopted in 2017 and seeks to expand the public charging infrastructure in the City to 300 chargers by 2020. By providing additional infrastructure, the EVAP aims to increase the percentage of electric vehicles on the road from 2% to 15% by 2025. The plan forecasts that replacing 13% (~9,000) of the fossil-fuel powered vehicles with EVs will save an estimated 26,000 metric tons of carbon dioxide.
- **Clean Big Blue Bus (BBB) Fleet** - Big Blue Bus operates a fleet of nearly 200 vehicles transporting more than 61,000 passengers daily. The entire fleet operates on alternative fuels, including renewable natural gas (RNG) a form of liquefied and compressed natural gas (LNG/CNG), which helps to cut emissions by up to 90 percent.
- **Clean City Fleet (excluding BBB and Fire Department Vehicles)** – The City is a member of "Clean Cities," a program sponsored by the U.S. Department of Energy which promotes the use of alternative fuel vehicles. Santa Monica's Fleet Management Division is one of the most innovative and progressive programs in the nation. Approximately, 60% of the citywide vehicle fleet and over 70% of non-emergency vehicles are fueled alternatively.
- **Renewable Energy Supplier** — Santa Monica purchases its electricity from Clean Power Alliance, a Joint Powers Authority (JPA) made up of public agencies across Los Angeles and Ventura counties working together to bring clean, renewable power to Southern California. Since February 2019 for residential customers (and in May 2019 for commercial customers), Clean Power Alliance purchases clean power for electricity and SCE delivers it. With the Clean Power Alliance, electricity customers in Santa Monica are automatically defaulted to have 100% renewable energy serving their electricity needs. Alternatively, customers can opt to have their electricity power consisting of 50% renewable content or 36%, or opt out of the Clean Power Alliance to remain with SCE as their energy supplier.
- **Ban on Gasoline Powered Leaf Blowers—**Section 4.08.270 of the City Municipal Code bans the operation of gasoline powered leaf blowers within the City limits.

For further discussion of the City's Climate Action and Adaptation Plan, Energy Code, and Green Building Ordinance that also reduce air emissions, refer to Section 4.8, *Greenhouse Gas Emissions*. Also refer to Section 4.17, *Transportation*, for a discussion of the City's Transportation Demand Management Ordinance which reduces vehicles miles traveled and associated air emissions.

4.2.4 Environmental Impacts

4.2.4.1 Thresholds of Significance

Appendix G of the State CEQA Guidelines provides questions that address potential impacts related to air quality impacts and are used by the City in this section.

Would the project:

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

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

c) Expose sensitive receptors to substantial pollutant concentrations?

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

In determining whether an effect is significant, State CEQA Guidelines (Section 15064.7) state that a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, provided that the decision to use such thresholds is supported by substantial evidence. Furthermore, with regard to air quality, Appendix G checklist's air quality section preamble reads "*Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make … determinations*."

In a February 2018 CEQA Guidance document released by SCAQMD, the SCAQMD further state that:[2] "Air districts' thresholds provide a clear quantitative benchmark to determine the significance of project and project alternative air quality impacts. They also help identify the magnitude of the impacts, facilitate the identification of feasible mitigation measures, and evaluate the level of impacts before and after mitigation measures. Since one of the basic purposes of CEQA is to inform government decision makers and the public about the potential, significant environmental effects of any proposed activities (CEQA Guidelines § 15002(a)(1)), use of air district thresholds is a best practice for CEQA impact determinations."

In compliance with State CEQA guidelines and SCAQMD guidance, the City of Santa Monica uses the SCAQMD's established thresholds for evaluating air quality impacts of proposed projects and assessing the significance of quantifiable impacts as applicable under each Appendix G question. The potential air quality impacts of the Project are, therefore, evaluated in consideration of the

[2] SCAQMD February 2018 "Guidance on Frequently Questioned Topics in Roadway Analysis for the California Environmental Quality Act"

thresholds adopted by SCAQMD in connection with its CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook, and subsequent SCAQMD guidance as discussed previously.[3]

Conflict with or Obstruct Implementation of Air Quality Plan

The threshold used for determining whether the Project would conflict with or obstruct an applicable air quality plan is qualitative and is based on whether the project is consistent with the assumed growth, applicable control measures and air emission reduction policies in the AQMP. Therefore, the Project would have a significant impact if it would:

- Conflict with or obstruct implementation of the AQMP or any other adopted regional and local plans adopted for reducing air quality impacts.

Cumulatively Considerable Net Increase in Criteria Pollutants

Construction

Given that construction impacts are temporary and limited to the construction phase, SCAQMD has established numerical thresholds of significance for construction air pollutant emissions specific to construction activity. The numerical thresholds are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health (SCAQMD 1993). Based on the thresholds in the SCAQMD CEQA Air Quality Handbook, the Project would potentially cause or contribute to an exceedance of an ambient air quality standard if the following would occur:

- Regional construction emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed daily emissions thresholds (SCAQMD 2015c):
  - 75 pounds per day for VOC
  - 100 pounds per day for NO_X
  - 550 pounds per day for CO
  - 150 pounds per day for SO_2
  - 150 pounds per day for PM10
  - 55 pounds per day for PM2.5

Operation

The SCAQMD has established numerical thresholds of significance for operation air pollutant emissions. The numerical significance thresholds are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health (SCAQMD 1993). The SCAQMD has established numeric thresholds of significance in part based on Section 182(e) of the Clean Air Act which identifies 10 tons per year of VOC as a significance level for stationary source emissions in extreme non-attainment areas for ozone (SCAQMD 1993). As shown in Table 4.2-3, the Air Basin

[3] While the SCAQMD CEQA Air Quality Handbook contains significance thresholds for lead, Project construction and operation would not include sources of lead emissions and would not exceed the established thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from commercial and residential land use projects such as the Project. As a result, lead emissions are not further evaluated in this Draft EIR.

is designated as extreme non-attainment for ozone. The SCAQMD converted this significance level to pounds per day for ozone precursor emissions (10 tons per year × 2,000 pounds per ton ÷ 365 days per year = 55 pounds per day). The numeric thresholds for other pollutants are also based on federal stationary source significance levels. Based on the thresholds in the SCAQMD CEQA Air Quality Handbook, the Project would potentially cause or contribute to an exceedance of an ambient air quality standard if the following would occur:

- Operational emissions exceed any of the following SCAQMD prescribed daily regional numeric thresholds (SCAQMD 2015c):
  - 55 pounds a day for VOC
  - 55 pounds per day for NO_X
  - 550 pounds per day for CO
  - 150 pounds per day for SO_X
  - 150 pounds per day for PM10
  - 55 pounds per day for PM2.5

Cumulative Impacts

Guidance regarding criteria for evaluating cumulative impacts is provided in CEQA Guideline Section 15064 (h)(3). Further, the SCAQMD has provided guidance on an acceptable approach to addressing the cumulative impacts issue for air quality (SCAQMD 2003a) stating that "as Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same." Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. Based on these provisions, the Project would have a cumulative significant impact if it would:

- Exceed SCAQMD regional significance thresholds individually and contribute to cumulative effects or be inconsistent with the AQMP.

Sensitive Receptors

Localized Significance Thresholds

The SCAQMD published its Final Localized Significance Threshold Methodology and Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM2.5 Significance Thresholds (October 2006), recommending that all air quality analyses include a localized assessment of both construction and operational impacts of the Project on nearby sensitive receptors (SCAQMD, 2008, SCAQMD 2006). LSTs are only applicable to the following criteria pollutants: NO_x, CO, PM_{10} and $PM_{2.5}$. LSTs represent the maximum emissions from a project site that are not expected to result in an exceedance of Federal or State AAQS. LSTs are based on the ambient concentrations of that pollutant within the Source Receptor Area (SRA) where a project is located and the distance to the nearest sensitive receptor. The Project Site is located in the northern portion of SRA 2 (Northwest Los Angeles County Coastal).

In the case of CO and NO_2, if ambient levels are below the air standards for these pollutants, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a State or Federal standard, then project emissions are considered significant if they increase ambient concentrations by a measurable amount. This would apply to PM10 and PM2.5, both of which are nonattainment pollutants in the Basin. For these latter two pollutants, the significance criteria are the pollutant concentration thresholds presented in SCAQMD Rules 403 and 1301. The Rule 403 threshold of 10.4 $\mu g/m^3$ applies to construction emissions (and may apply to operational emissions at aggregate handling facilities). The Rule 1301 threshold of 2.5 $\mu g/m^3$ applies to non-aggregate handling operational activities.

Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to adverse air quality. As previously discussed, sensitive receptors are located in proximity to the Project Site and have the potential to be exposed to localized construction and operational emissions.

Following the SCAQMD LST methodology, for sites larger than 5 acres, air dispersion modeling needs to be conducted. Because the Project Site exceeds 5 acres in area, the localized significance for project air pollutant emissions was determined by performing dispersion modeling to determine if the pollutant concentrations would exceed relevant significance thresholds established by the SCAQMD.

- LSTs. The following LSTs were applied to the construction and operation of the Project:
  - 0.18 ppm (State 1-hour); 0.100 ppm (Federal 1-hour); and 0.03 ppm (Annual) of NO_2 for construction.
  - 20 ppm (1-hour) and 9.0 ppm (8-hour) of CO for construction.
  - 10.4 $\mu g/m^3$ (24-hour) and 1 $\mu g/m^3$ of PM10 (Annual) for construction.
  - 10.4 $\mu g/m^3$ (24-hour) of PM2.5 for construction.
- The following LSTs were applied to operation of the project:
  - 0.18 ppm (State 1-hour); 0.100 ppm (Federal 1-hour); and 0.03 ppm (Annual) of NO_2 for operations.
  - 20 ppm (1-hour) and 9.0 ppm (8-hour) of CO for operation.
  - 2.5 $\mu g/m^3$ (24-hour) and 1.0 ppm (Annual) of PM10 for operations.
  - 2.5 $\mu g/m^3$ (24-hour) of PM2.5 for operation.

Carbon Monoxide Hotspots

With respect to the formation of CO hotspots, the Project would be considered significant if the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:

- The Project would cause or contribute to an exceedance of the CAAQS 1-hour or 8-hour CO standards of 20 or 9.0 parts per million (ppm), respectively (SCAQMD 2015c).

Toxic Air Contaminants

Based on the criteria set forth by the SCAQMD, the Project would expose sensitive receptors to substantial concentrations of toxic air contaminants if any of the following would occur (SCAQMD 2017c):

- The Project emits carcinogenic materials or TACs that exceed the maximum incremental cancer risk of ten in one million or a cancer burden greater than 0.5 excess cancer cases (in areas greater than or equal to 1 in 1 million) or an acute or chronic hazard index of 1.0.

Other Emissions including Odors

With respect to other emissions such as those leading to odors, the threshold is qualitative and directly addresses the question in the CEQA Guidelines. The Project's impact would be considered significant:

- If it created other adverse emissions affecting a substantial number of people.

For odors, the SCAQMD provides the following threshold: if the Project creates an odor nuisance pursuant to SCAQMD Rule 402.

4.2.4.2 Methodology

The evaluation of potential impacts to regional and local air quality that may result from the construction and long-term operations of the Project were conducted in accordance SCAQMD's CEQA Air Quality Handbook. The CEQA Air Quality Handbook was published by SCAQMD in November 1993 to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts. The CEQA Air Quality Handbook provides standards, methodologies, and procedures for conducting air quality analyses in EIRs and was used extensively in the preparation of this analysis. The SCAQMD is currently in the process of replacing the CEQA Air Quality Handbook with the Air Quality Analysis Guidance Handbook. While this process is underway, the SCAQMD recommends that lead agencies avoid using the screening tables in Chapter 6 Determining the Air Quality Significance of a Project of the CEQA Air Quality Handbook, because the tables were derived using an obsolete version of CARB's mobile source emission factor inventory, and the trip generation characteristics of the land uses identified in these screening tables were based on the fifth edition of the Institute of Transportation Engineer's Trip Generation Manual, instead of the most current edition. Additionally, the lead agency should avoid using the on-road mobile source emission factors in Table A9-5-J1 through A9-5-L (EMFAC7EP Emission Factors for Passenger Vehicles and Trucks, Emission Factors for Estimating Material Hauling, and Emission Factors for Oxides of Sulfur and Lead). The SCAQMD instead recommends using other approved models to calculate emissions from land use projects, such as the California Emissions Estimator Model (CalEEMod) software, initially released in 2011 and updated in 2016 (SCAQMD 1993). Additional details of the air quality analysis are provided in the emissions modeling worksheets in Appendix B.

Consistency with Air Quality Management Plan

SCAQMD is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the NAAQS (e.g., ozone and PM2.5). The SCAQMD's

AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving the NAAQS. These strategies are developed, in part, based on regional growth projections prepared by SCAG. Thus, projects, uses, and activities that are consistent with the assumed growth projections and control strategies assumed in the development of the AQMP would not conflict with or obstruct implementation of the AQMP, even if they exceed the SCAQMD's numeric thresholds for criteria air pollutants.

Net Increase in Criteria Pollutants

Construction

Construction of the Project has the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, and through vehicle trips generated from workers and haul trucks traveling to and from the Project Site. In addition, fugitive dust emissions (such as PM10 and PM2.5) would result from demolition and various soil-handling activities including grading and excavation. Mobile source emissions, primarily NO_X, would result from the use of construction equipment such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity and construction equipment used, and prevailing weather conditions.

Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. The emissions are estimated using CalEEMod (Version 2016.3.2) software, an emissions inventory software program recommended by the SCAQMD. CalEEMod is based on outputs from the OFFROAD model and EMission FACtors (EMFAC) model, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, heavy-duty off-road equipment, and on-road vehicles. Construction haul and vendor truck emissions during grading, concrete pour and building construction were evaluated using regional heavy-duty truck emission factors from EMFAC2014. Daily truck trips and default trip length data were used to assess roadway emissions from truck exhaust, as well as idling emissions based on typical idling activities in CalEEMod. The input values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the construction phasing assumptions used in the analysis to generate criteria pollutant emissions values for each construction activity.

Construction of the Phase II Master Plan will be implemented in up to 5 stages, which includes multiple substages. For the purposes of this EIR, construction work is assumed to begin in the 2nd Quarter of 2021 with occupancy and operation of the first Phase II building commencing in late 2022, and completion of the entire construction program by the end of 2041. The Project consists of two phasing plan scenarios: Phasing Plan A and Phasing Plan B. Phasing Plan B provides a similar type and intensity of construction of land uses as Phasing Plan A, but would be implemented with an alternative construction schedule. Construction of both Phasing Plan A and Plan B were evaluated with the same level of detail.

For the purposes of this analysis, it is assumed that some of the development sites of the Phase II Master Plan would be under construction concurrently with operation/occupancy of some of the

development sites. Project construction activities would include site demolition, grading, excavation, and building construction and finishing activities. Demolition activities would generate demolition debris (asphalt and general construction debris), which would require transport by haul truck. Soil excavation and grading activities would generate soil for export (discussed later), which would require transport by haul truck. Heavy-duty construction equipment, vendor supply trucks and concrete trucks would be used during construction of foundations, parking structures, and buildings. Landscaping and architectural coating would occur during the finishing activities.

The maximum daily regional emissions from these construction activities is estimated by construction phase for the potential worst-case maximum daily emissions of a Project construction day, which does not represent the emissions that would typically occur for every day of Project construction. The estimated maximum daily construction emissions are then compared to the SCAQMD daily significance thresholds to identify any exceedances of thresholds, which could result in a significant impact.

Operation

Operation of the Project would generate criteria pollutant emissions from Project-generated vehicle trips traveling to and from the Project Site, energy sources on-site such as natural gas combustion, area sources such as landscaping equipment and the use of consumer products. The Project would also produce criteria pollutant emissions from onsite diesel-fueled emergency generators and natural gas engines for the Project's proposed new combined heat and power (CHP) system, which uses natural gas to produce both heat and electricity for building operations. The CHP system would be located at Site 2D/E. Operational impacts were assessed for the full Project buildout year of 2041 with occupancy and interim year operations in 2031.

The Project's operational emissions were estimated using the CalEEMod software, which was used to forecast the daily regional emissions from area, energy, and mobile sources that would occur during long-term Project operations. In calculating mobile-source emissions, emissions are estimated based on the predicted number of trips to and from the Project Site and the estimated vehicle miles traveled (VMT) determined in the Traffic Study for the Project (Appendix L). The trip estimates take into account trip reductions from Project land use characteristics including internal capture from co-locating commercial and residential uses on the Project Site, and from transit and pedestrian trips.

Energy source emissions are based on natural gas combustion (building heating and water heaters) and area source emissions are based on landscaping equipment, architectural coatings, and consumer product usage (including cleaners), in CalEEMod. Natural gas usage factors in CalEEMod are based on the California Energy Commission (CEC) California Commercial End Use Survey (CEUS) data set, which provides energy demand by building type and climate zone (CEC 2006). However, since the data from the CEUS is from 2002, CalEEMod incorporates correction factors to account for the appropriate version of the Title 24 Building Energy Efficiency Standards (currently the 2016 Title 24 Standards).

Emergency generator emissions are estimated separately from CalEEMod. Stationary source emissions are calculated based on emissions factors available from SCAQMD. Emergency

generators are permitted by the SCAQMD and regulated under SCAQMD Rule 1470. The emergency generator emissions are calculated based on compliance with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) mandated emission limits and operating hour constraints. Maintenance and testing would not occur daily, but rather periodically, up to 50 hours per year per Rule 1470. For the purposes of estimating maximum daily emissions, it is estimated that one emergency generator would operate for up to one hour per day when maintenance and testing activities occur.

Natural gas emissions from the Project's CHP system are estimated separately from CalEEMod. The CHP system would utilize three natural gas engines with an electrical output of 100 kW each. Emissions were based on daily operating parameters and manufacturer specific emissions factors.

Operational air quality impacts are assessed based on the incremental increase in emissions compared to baseline conditions. Under CEQA, the baseline environmental setting for an EIR is established at or around the time that the Notice of Preparation for the EIR is published. As discussed previously, the Project Site is currently occupied by surface parking lots, vacant lots, and occupied hospital, residential, and commercial buildings. The parking lots and vacant lots, themselves do not generate air pollutant emissions; however, the operation of the buildings onsite generate air pollutant emissions. Therefore, the net operational emissions (Project minus Existing) generated by the Project are equal to the entirety of the Project's emissions. The maximum daily emissions from operation of the Project are compared to the SCAQMD daily regional numeric thresholds.

Cumulative Impacts

The SCAQMD CEQA Air Quality Handbook states that the "Handbook is intended to provide local governments, project proponents, and consultants who prepare environmental documents with guidance for analyzing and mitigating air quality impacts of projects."[4] The SCAQMD CEQA Air Quality Handbook also states that "[f]rom an air quality perspective, the impact of a project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air pollution thresholds established by the District."[5] The SCAQMD has also provided guidance on an acceptable approach to addressing the cumulative impacts issue for air quality as discussed below:[6]

> *As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the Project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.*

4 South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, p. iii.

5 South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, p. 6-1.

6 South Coast Air Quality Management District, Cumulative Impacts White Paper, Appendix D, http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4. Accessed September 2018.

While it may be possible to add emissions from the list of cumulative projects and the Project, it would not provide meaningful data for evaluating cumulative impacts under CEQA because neither the City nor the SCAQMD have established numerical thresholds applicable to the summation of multiple project emissions for comparison purposes. Additionally, regional emissions from a project have the potential to affect the Air Basin as a whole and it is not possible to establish a geographical radius from a specific project site where potential cumulative impacts from regional emissions would be limited. Meteorological factors, such as wind, can disperse pollutants, often times tens of miles downwind from a project site. Therefore, consistent with accepted and established SCAQMD cumulative impact evaluation methodologies, the potential for the Project to results in cumulative impacts from regional emissions is assessed based on the SCAQMD thresholds.

Sensitive Receptors

Localized Significance Thresholds

SCAQMD has developed the Localized Significance Threshold (also known as "LST") methodology and recommends that this methodology be used in determining whether a project may generate significant adverse localized air quality impacts and substantially affect sensitive receptors. The evaluation of localized air quality impacts determines the potential of the Project to generate daily emissions that would exceed LSTs.

According to the SCAQMD LST assessment methodology, the assessment of localized impacts addresses only those emissions that are generated "onsite," that is for the purposes of this Project, emissions generated from within or along the boundaries of the Project Site. Therefore, for this localized analysis, only the onsite emissions are examined.

To evaluate localized impacts for construction and operation, an air dispersion model (EPA model, AERMOD) was used to simulate the movement of Project related air pollutants through the air and output air concentrations of those pollutants at sensitive receptor locations surrounding the Project Site. The estimated concentrations provide conservative estimates (in terms of likely over-predictions) and may not represent actual occurrences. The methodology follows SCAQMD modeling guidance for AERMOD, where applicable (SCAQMD 2016b).

Carbon Monoxide Hotspots

Localized areas where ambient concentrations exceed state and/or federal standards are termed CO hotspots. The potential for the Project to cause or contribute to the formation of off-site CO hotspots are evaluated based on prior dispersion modeling of the four busiest intersections in the Air Basin that has been conducted by SCAQMD for its CO Attainment Demonstration Plan in the AQMP. The analysis compares the intersections with the greatest peak-hour traffic volumes that would be impacted by the Project to the intersections modeled by SCAQMD. Project-impacted intersections with peak-hour traffic volumes, that are lower than the intersections modeled by SCAQMD, in conjunction with lower background CO levels, would result in lower overall CO concentrations compared to the SCAQMD modeled values in its AQMP.

Toxic Air Contaminants Impacts

Construction

The greatest potential for TAC impacts during Project construction would be related to diesel particulate matter (DPM) emissions associated with heavy-duty equipment during demolition, excavation and grading activities. Construction activities associated with the Project would be sporadic, transitory, and short-term in nature. Although Project construction would be temporary, construction impacts associated with TACs are addressed quantitatively in a refined HRA.

Health risk calculations were performed using the California Office of Environmental Health Hazard Assessment (OEHHA) methodologies and exposure parameters, and the corresponding SCAQMD guidance documents. In March 2015, OEHHA updated the methods for estimating cancer risks to use higher estimates of cancer potency during early life exposures and to use different assumptions for breathing rates and length of residential exposures. The new guidance, *Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments*, incorporates advances in risk assessment with consideration of infants and children using Age Sensitivity Factors (ASF) (OEHHA 2015). These updated exposure factors can result in numeric life-time health risk values to be approximately two to three times higher than those calculated under the previous OEHHA guidelines. ESA followed the 2015 guidance in performing the HRA.

This analysis calculated the cancer risk and chronic hazard indices to estimate Project-specific health risks for construction emissions using annual average pollutant ambient concentrations modeled by AERMOD.

The cancer risk values for DPM considers exposure via the inhalation pathway. The potential exposure through other pathways (e.g., ingestion) requires substance and site-specific data, and the specific parameters for DPM are not known for these pathways (CARB 1998). The OEHHA Guidance recommends the incorporation of several factors to quantify the carcinogenic compound dose via the inhalation pathway. Once determined, the dose is multiplied by the compound-specific inhalation cancer potency factor to derive the cancer risk estimate. The dose takes into account the concentration at a sensitive receptor. The cancer potency factor is compound-specific. In performing health risk calculations, carcinogenic compounds are not considered to have threshold levels (i.e., dose levels below which there are no risks). Any exposure, therefore, will have some associated risk. Incremental health risks associated with exposure to carcinogenic compounds is defined in terms of the probability of developing cancer as a result of exposure to a chemical at a given concentration. Under a deterministic approach (i.e., point estimate methodology), the cancer risk probability is determined by multiplying the chemical's annual concentration by its unit risk factor (URF). The URF for DPM recommended by the Scientific Review Panel[7] is 3.0×10^{-4} per microgram per cubic meter ($\mu g/m^3$). This value corresponds to a Cancer Potency Factor (CPF) of 1.1 per milligram/kilogram (body weight) per day (mg/kg(bw)-day). The URF for DPM means that for receptors with an annual average concentration of 1 $\mu g/m^3$ in the ambient air, the probability of contracting cancer over a lifetime of exposure is 300 in 1 million. This approach for calculating cancer risk is intended to result in conservative (i.e., health protective) estimates of health impacts

[7] The Scientific Review Panel is charged with evaluating the risk assessments of substances proposed for identification as toxic air contaminants by CARB, OEHHA, and the Department of Pesticide Regulation (DPR), and the review of guidelines prepared by OEHHA.

and is used for assessing risks to sensitive receptors. The estimation of health risks is calculated as follows:

Equation 1: $Dose_{RESIDENT}$ (mg/kg/day) = $C_{AIR} \times DBR \times A \times EF \times CF$ where:

- C_{air}= concentration in air (µg/m^3)
- DBR= daily breathing rate normalized to body weight (L/kg body weight-day)
- A= inhalation absorption factor (1 for DPM, unitless)
- EF= exposure frequency (unitless) (days/365 days)
- CF= 10^{-6}, correction factor, micrograms to milligrams conversion, liters to cubic meters conversion

Equation 2: $Risk_{INH\text{-}RESIDENT}$ (in one million) = $Dose_{AIR} \times CPF \times ASF \times ED/AT \times FAH \times CCF$ where:

- $Dose_{AIR}$= daily inhalation dose (mg/kg-day)
- CPF= cancer potency factor (mg/kg-day) $^{-1}$
- ASF= age sensitivity factor (unitless)
- ED= exposure duration (years)
- AT= averaging time for lifetime cancer risk (years)
- FAH= fraction of time spent at home (unitless)
- CCF= 10^6, cancer conversion factor to represent risk in chances per million

Equation 3: $Dose_{STUDENT}$ (mg/kg/day) = $[C_{AIR} \times WAF] \times DBR \times A \times EF \times CF$ where:

- C_{air}= concentration in air (µg/m^3)
- WAF= worker adjustment factor (unitless), WAF = $(H_{residential} / H_{source})$ x $(D_{residential} / D_{source})$ = (24/8) x (7/6) = 3.5
- DBR= daily breathing rate normalized to body weight (L/kg body weight-day)
- A= inhalation absorption factor (1 for DPM, unitless)
- EF= exposure frequency (unitless) 0.46 (180 days / 365 days). Equivalent to school days per year
- CF= 10^{-6}, correction factor, micrograms to milligrams conversion, liters to cubic meters conversion

Equation 4: $Risk_{INH\text{-}STUDENT}$ (in one million) = $Dose_{AIR} \times CPF \times ASF \times ED/AT \times FAH \times CCF$ where:

- $Dose_{AIR}$= daily inhalation dose (mg/kg-day)
- CPF= cancer potency factor (mg/kg-day^{-1})
- ASF= age sensitivity factor (unitless)
- ED= exposure duration (years)
- AT= averaging time for lifetime cancer risk (years)
- CCF= 10^6, cancer conversion factor to represent risk in chances per million

A summary of the exposure parameters used under this methodology are shown in **Table 4.2-5**, *Cancer Risk Exposure Parameters*.

TABLE 4.2-5
CANCER RISK EXPOSURE PARAMETERS

	Residential				
Parameter	**3rd Trimester**	**0 < 2 years**	**2 < 16 years**	**16<30**	**School-Student**
C_{AIR} (ug/m^3)	Based on AERMOD dispersion modeling results				
DBR[a] (L/kg BW-day)	361	1,090	572	261	261
A[b] (unitless)	1	1	1	1	1
EF[b] (unitless)	0.96	0.96	0.96	0.96	0.46
CF[b] (unitless)	10^{-6}	10^{-6}	10^{-6}	10^{-6}	10^{-6}
CPF[b] (mg/kg/day-^{1})	1.1	1.1	1.1	1.1	1.1
ASF[b] (unitless)	10	10	3	1	1
ED[b,c] (years)	0.25	2	14	14	6
AT[b] (years)	70	70	70	70	70
FAH[a] (unitless)	1	1	1	1	--
WAF[a,c] (unitless)	--	--	--	--	3.5
CCF[b] (unitless)	10^6	10^6	10^6	10^6	10^6

[a] SCAQMD 2017 Risk Assessment Procedures, Permit Application N, Use in conjunction with the Risk Assessment Guideline 1401,1401.1, and 212
[b] OEHHA 2015 Guidance Manual
[c] WAF is based on construction emissions occurring 6 days per week for 8 hours per day. This analysis treats students at school as workers at work for an 8-hour day.

SOURCE: ESA, 2009

Age Sensitivity Factors

The estimated excess lifetime cancer risks for residential receptors (including the early-in-life exposure) were adjusted using the ASFs recommended in the California Environmental Protection Agency (Cal/EPA) OEHHA Technical Support Document and 2015 OEHHA guidance (OEHHA 2009). This approach accounts for an "anticipated special sensitivity to carcinogens" of infants and children. Cancer risk estimates were weighted by a factor of 10 for exposures that occur from the third trimester of pregnancy to two years of age and by a factor of three for exposures that occur from 2 to 15 years of age. No weighting factor (i.e., an ASF equal to one, which is equivalent to no adjustment) is applied to ages 16 to 70 years.

Cancer Risk Calculation

Excess lifetime cancer risks are estimated as the upper-bound incremental probability that an individual will develop cancer over a lifetime as a direct result of exposure to carcinogens. The risk is expressed as a unitless probability, and was calculated as the number of cancer incidences per million individuals in the HRA. The cancer risk for each chemical was calculated by multiplying the chemical intake or dose at the human exchange boundaries (e.g., lungs) by the DPM CPF. For

cancer risk, the SCAQMD guidance identifies a significant impact if a project would result in an incremental cancer risk that is greater than 10 per million for any receptor.

Chronic Health Impacts

Non-cancer effects of chronic (i.e., long- term) DPM exposures were evaluated using the Hazard Index (HI) approach consistent with the OEHHA guidance. The chronic HI was calculated by dividing the modeled annual average concentration by the Reference Exposure Level (REL). The REL is the concentration at or below which no adverse health effects are anticipated. The REL for DPM was obtained from OEHHA. OEHHA has recommended an ambient concentration of 5 micrograms per cubic meter ($\mu g/m^3$) as the chronic inhalation REL for DPM exhaust. The SCAQMD guidance identifies a significant impact if a project would result in an incremental chronic HI that is greater than 1.0.

The process of assessing health risks and impacts includes a degree of uncertainty. The level of uncertainty depends on the availability of data and the extent to which assumptions must be relied upon in cases where the data are incomplete or unknown. All HRAs rely upon scientific studies to reduce the level of uncertainty; however, it is not possible to completely eliminate uncertainty from the analysis. Where assumptions are used to substitute for incomplete or unknown data, it is standard practice in performing HRAs to err on the side of health protection to avoid underestimating or underreporting the risk to the public. In general, sources of uncertainty that may lead to an overestimation or an underestimation of the risk include extrapolation of toxicity data in animals to humans and uncertainty in the exposure estimates. In addition to uncertainty, there exists "a natural range or variability in measured parameters defining the exposure scenario," and that "the greatest quantitative impact is variation among the human population in such properties as height, weight, food consumption, breathing rates, and susceptibility to chemical toxicants" (OEHHA 2015). As mentioned previously, it is typical to err on the side of health protection by assessing risk on the most sensitive populations, such as children and the elderly, by modeling potential impacts based on high-end breathing rates, by incorporating age sensitivity factors, and by not taking into account exposure reduction measures, such as mechanical air filtration building systems. These conservative assumptions were implemented in the analysis contained within this Draft EIR and as detailed in Appendix B.

Operations

During long-term operations, TACs could be emitted as part of periodic maintenance operations, cleaning, painting, etc., periodic visits to the Project Site from delivery trucks and service vehicles, as well as maintenance and testing of the emergency generators. However, these emissions are expected to be occasional and result in minimal exposure to off-site and on-site sensitive receptors. As the Project consists of residential and commercial/institutional (i.e., medical center) uses, the Project would not include sources of substantive TAC emissions identified by SCAQMD or CARB siting recommendations. Thus, a qualitative analysis is appropriate and utilized for this Project.

4.2.4.3 Project Characteristics

As more fully described in Chapter 2, *Project Description*, the Project includes the Phase II Master Plan, with the Phase II Development Program consisting of ten Project buildings with related infrastructure improvements and open space on the Project Site.

Construction

The precise construction timeline for each Phase II development will depend on the timing of entitlements and permit processing. For the purposes of this EIR, construction work is assumed to begin in the 2nd Quarter of 2021 with occupancy and operation of the first Phase II building commencing in late 2022, and completion of the entire construction program by the end of 2041.

The Phase II Project Phasing Plan consists of two alternate phasing plans: Phasing Plan A and Phasing Plan B, as noted above. Phasing Plan B, presented below, provides a similar type and intensity of land uses as Phasing Plan A, but will be implemented with an alternative construction schedule that allows PSJHC to pursue development on Site 2C as the first stage of construction.

The Project would require the demolition of existing buildings, surface parking areas, and associated landscaping. These activities would require excavation and off-site hauling of soils. The total demolition material (e.g., removed asphalt) would be approximately 15,975 cubic yards and require approximately a total of 1,599 trucks (10 cubic yards per truck) over the course of Project construction. The total excavation required for the Project is approximately 919,662 cubic yards and require approximately a total of 91,966 trucks (10 cubic yards per truck) over the course of Project construction. Excavation would be performed pursuant to SCAQMD rules which control air pollutant emissions. Excavation along with related shoring activities would require the use of equipment such as: front loader, tracked excavator, skid steer, haul trucks, drill rig, compressor, small tools and light trucks.

CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling to reduce public exposure to diesel particulate matter and other toxic air contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than 5 minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h)) to reduce NOx, PM10, and PM2.5 emissions from existing diesel vehicles operating in California. This regulation will be phased in, with full implementation for large and medium fleets by 2023 and for small fleets by 2028. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. While intended to reduce construction criteria pollutant emissions, compliance with the above anti-idling and emissions regulations would also result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy.

Land Use Characteristics

The Phase II Master Plan (the Project) allows for 10 Phase II Project buildings and associated infrastructure and open space improvements (Phase II Development Program). The Phase II Development Program would result in up to 682,700 square feet of new floor area or a net increase of 582,915 square feet with maximum building heights ranging from 36 feet to 105 feet (depending on site).

The Phase II Development Sites includes Sites 2I, 2C, 2D/E within the North Campus and Sites S1, S2, S3, S4, and S5 within the South Campus. These sites are depicted in **Figure 2-3**, *Phase II Site Plan,* and listed in **Table 2-3**, *Phase II Development Summary*, in Chapter 2. Together, these sites hereafter are referred to as "Project Site".

The Project Site is accessible to the regional transportation network, located approximately 0.9 miles north of the I-10 ramps at Cloverfield Boulevard. Additionally, the Project Site is located in close proximity to two Expo Light Rail stations, approximately 0.8 miles northeast of the 17th Street/Santa Monica College Station (at 17th Street and Colorado Avenue) and 0.8 miles northwest of the 26th Street/Bergamot Station (located at 26th Street and Olympic Boulevard). Bus transit service within one-half mile of the Project Site include four Santa Monica Big Blue Bus routes and one Los Angeles County Metro route, with stops along Santa Monica Boulevard and 20th Street. These bus stops are located within one and two blocks of all Phase II Development Sites on the PSJHC Campus. Three Breeze Bike Share Hubs are located within one-half mile of the Project Site: at Broadway and 20th Street, 20th Street and Arizona Avenue, and at Broadway and Cloverfield Boulevard. The Project Site's proximity to these publicly available transit services enable the Project to potentially reduce vehicle trips, vehicle miles traveled (VMT), and associated transportation-related emissions compared to a project without these characteristics.

Project Design Features & Regulatory Requirements

The Project includes Project Design Features (PDF) to minimize pollutant emissions during construction and operation. Three categories of PDFs would minimize the amount of air pollutant emissions, two of the categories would also reduce GHG emissions. The PDFs are listed below:

PDF-AQ-1: Demolition, Grading and Construction Activities:

1. Compliance with provisions of the SCAQMD District Rule 403. The Project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
    a. All unpaved demolition and construction areas shall be wetted at least three times daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting a minimum of three times daily will reduce fugitive dust by 61 percent.
    b. The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.

c. All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.

d. All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

e. All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.

f. General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

g. Trucks having no current hauling activity shall not idle and be turned off.

h. Ground cover in disturbed areas shall be replaced as quickly as possible.

i. Cranes would be electric-powered.

2. **Anti-Idling Regulation:** In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

3. **Fuel Requirements:** In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

4. **Architectural Coatings:** During construction of Phase II buildings, construction contractors shall comply with SCAQMD Rule 1113 and utilize architectural coatings that meet the VOC content requirements.

PDF-AQ-2: **Green Building Features:** At a minimum, Phase II buildings will be designed and operated to meet the applicable requirements of the California Green Building Standards Code (CALGreen) and the City of Santa Monica Green Building Code. Green building features will include the following:

1. Waste

a. Construction contractors for Phase II development will implement a construction waste management plan (WMP) to divert a minimum of 70 percent of all mixed construction and demolition (C&D) debris to City certified construction and demolition waste processors, consistent with the City of Santa Monica Municipal Code Article 8, Chapter 8.108.

b. The Project will include easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics, metals, and landscaping debris (trimmings), consistent with the City of Santa Monica Municipal Code, Section 9.21.130.

2. Energy

a. Phase II buildings will comply with the California 2019 Title 24 Building Energy Efficiency Standards or the most recent standards at the time of building permit issuance. Additionally, the Project will comply with the City of Santa Monica Green Building Code by incorporating solar water heating, green roofs, high-performance building envelopes, energy-

efficient HVAC and lighting systems, thereby reducing energy use, air pollutant emissions, and GHG emissions.

b. Phase II buildings will include the installation of solar electric photovoltaic (PV) systems, as required by the City of Santa Monica Green Building Standards Code. At minimum, the PV systems will have a total wattage of 2.0 times the square footage of the building footprint (2.0 watts per square foot).

c. The design of Phase II buildings will incorporate surface materials with a high solar-reflectance-index average, coupled with roof assemblies having insulation factors that meet the 2019 California Title 24 Building Energy Efficiency Standards or the most recent standards at the time of building permit issuance, to reduce unwanted heat absorption and minimize energy consumption.

3. Transportation

a. Providence Saint John's will implement a Transportation Demand Management (TDM) Plan with measures to decrease vehicle miles traveled. The specific TDM strategies to be implemented by the developer shall be finalized as part of the Development Agreement process. It is anticipated that the following TDM strategies will be implemented and/or maintained: a TDM Coordinator; Transportation Management Association (TMO); transit pass subsidies provided to employees by the Project Applicant; ridesharing (carpools and vanpools); parking pricing; Guaranteed Ride Home (GRH); bicycle facilities; carshare service; bicycle sharing areas; transportation information center and TDM website information; pedestrian wayfinding signage; and commuter club.

b. To encourage carpooling and the use of electric vehicles by Providence Saint John's employees and visitors, designated parking for carpools and vanpools will be provided throughout the North and South Campuses in accordance with SMMC Section 9.28.150.

c. Electric Vehicle (EV) Charging Stations will be provided throughout the North and South Campuses. The total number of electric vehicle charging stations would be determined as part of the Development Agreement to be finalized; however, all Phase II Project facilities with more than 50 parking spaces would include at least two charging stations plus one for each additional 50 parking spaces consistent with SMMC Section 9.28160(B)(2).

d. Both long-term and short-term bicycle parking will be provided throughout the North and South Campuses. The number of parking spaces shall be provided in accordance with SMMC Table 9.28.140, which requires one short-term bicycle parking space for every 4,000 square feet of floor area (depending on the use). Upon full Phase II Project implementation, PSJHC shall have more than 60 new short-term bicycle parking spaces and 120 new long-term bicycle parking spaces added to its North Campus and more than 100 new short-term spaces and more than 200 new long-term spaces added to its South Campus.

Showers and clothes lockers for employees will also be provided throughout the North and South Campuses. In accordance with SMMC

Section 9.28.170(B)(1), a minimum of two showers would be provided in Phase II Buildings 2C, 2D/E, 2I, and S1 while a minimum of four showers would be provided in Building S4. Consistent with SMMC Section 9.28.170(B)(2), lockers for clothing and other personal effects would be provided at a ratio of 75% of the long-term employee bicycle parking spaces required. Upon full Phase II Project implementation, PSJHC would have more than 90 new clothes lockers on its North Campus and more than 100 new clothes lockers on its South Campus.

4. Water

a. The Project would be designed to reduce indoor and outdoor potable water consumption as required by California 2019 Title 24 standards.

PDF-AQ-3: **Control of VOCs:** Phase II buildings will utilize low-emitting materials in accordance with PDF-AQ-1.

PDF-AQ-4: **Emergency Generator Maintenance & Testing:** The Project shall only conduct maintenance or testing on one generator per day and for only one hour.

PDF-AQ-5: **Emergency Generators:** All new standby generators proposed shall be selected from the South Coast Air-Quality Management District's certified generators list and meet the EPA Tier 4 standard for diesel emissions. For after-treatment of engine exhaust air, a diesel particulate filter shall be provided to meet the emission level requirements of the South Coast Air Quality Management District. The Project would have six generators and would need to be tested monthly to ensure reliability in the case of a power outage.

The above list of PDFs represents the minimum that would be included in the Project to reduce air pollutant emissions. More aggressive PDFs (such as greater EV charging spaces and/or bicycle parking) and/or additional measures to reduce air quality emissions may be incorporated as part of the final Development Agreement for the Phase II Master Plan. The DA process is on-going and final determination of additional features/measures (if any) will be determined at the time of project approval.

4.2.4.4 Project Impacts

Consistency with Applicable Air Quality Plans

Impact AQ-1: *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

Impact Statement AQ-1: The Project's short-term jobs during construction would not conflict with the AQMP's long-term employment projections and Project construction would also comply with the applicable regulations for reducing criteria pollutant emissions during construction activities. The Project's employee growth would not exceed the expected regional growth projections and Project operations would be consistent with regulations for reducing criteria pollutants. Therefore, the Project's construction and operations would not conflict with implementation of the AQMP or relevant air quality-related policies in the General Plan or other adopted regional and local plans adopted for reducing air quality impacts and impacts would be less than significant.

Construction

Under this criterion, a project would be deemed inconsistent with the air quality plan if it results in population and/or employment growth that exceeds growth estimates in the air quality plan. The Project would result in an increase in short-term employment compared to existing conditions. Although the Project will generate construction workers on the Project Site during the construction process, the Project would not necessarily create new construction jobs since construction workers typically are already part of the existing regional labor force and generally, travel amongst construction sites as individual projects are completed. Construction jobs under the Project would not conflict with the long-term employment projections upon which the AQMP is based.

Project construction would also comply with SCAQMD rules and regulations, including Rule 403 requirements and the ATCM to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time. These measures would also be imposed on other construction projects in the Air Basin as required, which would include each of the cumulative projects in the Project Area.

Therefore, construction for the Project would not conflict with or obstruct implementation of the AQMP.

Operations

The Project's location, design and mix of land uses also render it consistent with the AQMP. The AQMP includes Transportation Control Measures that are intended to reduce regional mobile source emissions. While the majority of the measures are implemented by cities, counties, and other regional agencies such as SCAG and SCAQMD, the Project's location, design and land uses would support measures related to reducing vehicle trips for visitors and employees by increasing the commercial density near public transit.

The Project Site is located in proximity to two Expo Light Rail stations, approximately 0.8 miles northeast of the 17th Street/Santa Monica College Station (at 17th Street and Colorado Avenue) and 0.8 miles northwest of the 26th Street/Bergamot Station (located at 26th Street and Olympic Boulevard). Bus transit service within one-half mile of the Project Site include four Santa Monica Big Blue Bus routes and one Los Angeles County Metro route, with stops along Santa Monica Boulevard and 20th Street. These bus stops are located within one and two blocks of all Phase II Development Sites on the PSJHC Campus. Three Breeze Bike Share Hubs are located within one-half mile of the Project Site: at Broadway and 20th Street, 20th Street and Arizona Avenue, and at Broadway and Cloverfield Boulevard. The Project Site's proximity to these publicly available transit services enable the Project to potentially reduce vehicle trips, VMT, and associated transportation-related emissions compared to a project without these characteristics.

The 2016 AQMP incorporates transportation control measures based on strategies from the 2016 RTP/SCS, such as land use strategies to focus new growth around transit and transportation strategies to expand regional transit. The Project's growth would be consistent with SCAG RTP/SCS goals and objectives under SB 375 to implement "smart growth" and state efforts to meet goals in the reduction of GHG. The SCAG RTP/SCS seeks to maximize mobility and accessibility for all people and good by improving upon goals in the 2016 RTP/SCS. (SCAG 2016). According

to SCAG, incorporating smart land use strategies, such as developing "Complete Communities" concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other therefore reduces vehicular demand" and associated pollutants (SCAG 2016). Additionally, the SCAG RTP/SCS seeks better "placemaking," defined as "the process of developing options for locations where [people] can live and work that include a pleasant and convenient walking environment that reduces [people's] reliance on their car" (SCAG 2016). Thus, the Project's proximity to public resources and services allows the Project's projected employment growth to be accommodated by the City's transportation resources and decreases the time and cost of traveling as well as vehicular demand and associated pollutants. The Project would locate employment opportunities in close proximity to off-site residential uses such that people would have the opportunity to live and work in the same vicinity and have access to convenient modes of transportation that provides options for reducing reliance on automobiles. The Project's increase in employment would be consistent with SCAG's RTP/SCS goals and, as a result, consistent with the growth projections for the period between 2020 and 2040 the City as a whole. The Project would therefore also be consistent with the growth projections as contained in the City's General Plan, and ultimately consistent with the growth projections in the AQMP, since the growth would occur in a transit rich area, which would minimize potential growth in transportation-related emissions.

As shown in Section 4.14, *Population and Housing,* the Project's increase in population would represent approximately 0.1 percent of the population growth projected for the Land Use and Circulation Element (LUCE) of the City's General Plan, and approximately 0.1 percent and 0.001 percent, respectively, of the population growth projected for the City and County in SCAG's 2016-2040 RTP/SCS, between 2015 and 2030 by the City and between 2016 and 2041 by SCAG (with the 2040-2041 timeframe interpolated). The Project would provide 10 multi-family residential units at the Project Site to replace the 10 existing vacant multi-family residential units to be removed. Therefore, there would be no net loss or increase in housing under the Project, and given that the Project Site is not zoned for residential development, the no net change in the number of housing units would be consistent with the LUCE and SCAG's 2016-2040 RTP/SCS.

The Project's proposed medical uses would generate an estimated 823 employees at the Project Site, or a net increase of 646 employees. This net increase in employees would represent approximately 17.5 percent of the growth in employees projected for the City in the LUCE between 2015 and 2030, and approximately 5.8 percent and 0.16 percent, respectively, of the growth in employees projected for the City and County in SCAG's 2016-2040 RTP/SCS, between 2018 and 2041 (with the 2040-2041 timeframe interpolated). While the Project-related increase in employees would represent between 5.8 and 17.5 percent of the increase in employees projected for the City, PSJHC is already one of the largest employers in the City, and as indicated previously: (1) the Project would be consistent with the existing zoning of the Project Site such that this increase in employment is already included in the growth projections for employees in the LUCE and SCAG's 2016-2040 RTP/SCS; and (2) the Project would develop less uses, and thus generate less employees, than has already been vested at the Project Site by the PSJHC DA.[8] Thus, the Project

[8] The PSJHC 1998 DA (Section 3.7.3(a)-(b)) established vested rights for up to 799,000 sf of floor area, 10 replacement apartments, and up to 100 visitor housing units at the Phase II Development Sites (see Table 2-2 in Chapter 2, *Project Description*, of this Draft EIR for a breakdown of the vested uses). This is compared to the 682,700 sf of floor area, 10 replacement housing units, and 56-64 visitor housing units proposed under the Project (see Table 2-3 in Chapter 2 for a breakdown of the proposed uses).

would not conflict with or obstruct implementation of the AQMP, and impacts would be less than significant.

General Plan Air Quality-Related Policies

The City's General Plan includes Citywide policies regarding a range of City resources and services, some of which are relevant to air quality. **Table 4.2-6,** *Comparison of the Project to Applicable Air Quality-Related Policies of the General Plan*, evaluates the consistency of the Project with the applicable air quality-related goals, objectives, and policies in the Land Use and Circulation Element of the General Plan.

Air Quality-Related Policies from the Sustainable City Plan

The City's Sustainable City Plan include Citywide policies regarding a range of City resources and services, some of which are relevant to air quality. **Table 4.2-7,** *Comparison of the Project to Applicable Air Quality-Related Policies of the Sustainable City Plan*, evaluates the consistency of the Project with the applicable air quality-related goals, objectives, and policies in the Sustainable City Plan. For analysis of the Project's consistency with the City's Climate Action and Adaptation Plan, please refer to Section 4.8, *Greenhouse Gas Emissions*.

TABLE 4.2-6
COMPARISON OF THE PROJECT TO APPLICABLE AIR QUALITY-RELATED POLICIES OF THE GENERAL PLAN

Policies	Analysis of Project Consistency
Land Use and Circulation Element – Land Use Policies	
LU2.5 Vehicle Trip Reduction. Achieve vehicle trip reduction through comprehensive strategies that designate land uses, establish development and street design standards, implement sidewalk, bicycle and roadway improvements, expand transit service, manage parking, and strengthen Transportation Demand Management programs that support accessibility by transit, bicycle and foot, and discourage vehicle trips at a district-wide level. Monitor progress using tools that integrate land use and transportation factors. Increase bicycle and pedestrian connectivity in transit districts and adjust bus and shuttle services to ensure success of the transit system.	**Consistent.** The Project's characteristics would reduce trips and VMT due to its infill location, access to public transportation within a quarter-mile of the Project Site, close proximity to multiple other destinations including job centers and retail uses. The Project would encourage alternative modes of transportation by implementing an enhanced TDM plan and installing long-term and short-term bicycle parking spaces. Upon full Project implementation, PSJHC would have more than 60 new short-term bicycle parking spaces and 120 new long-term bicycle parking spaces added to its North Campus and more than 100 new short-term spaces and more than 200 new long-term spaces added to its South Campus.
LU8.1 Transportation Demand Management. Require participation in TDM programs for projects above the base to encourage walking, biking, and transit, and to reduce vehicle trips. Engage existing development in TDM Districts and programs to encourage reduction of existing vehicle trips.	**Consistent.** The PSJHC Campus is governed by an existing TDM plan that include, but are not limited to: providing employees that commute using public transit free transit passes (Big Blue Bus or Metro EZ Pass), providing free vanpools for employees outside a 15-mile radius of the Campus, providing additional financial incentives to employees for each day they do not drive alone to Campus, rideshare matching services, and a guaranteed ride home program. With the Project, PSJHC would provide an enhanced TDM Plan with greater incentives for its employees to reduce single-occupancy vehicle trips to the Campus. Upon full Phase II Project implementation, PSJHC would have more than 60 new short-term bicycle parking spaces and 120 new long-term bicycle parking spaces added to its North Campus and more than 100 new short-term spaces and more than 200 new long-term spaces added to its South Campus. The Project would also provide showers and lockers for employees. Consistent with SMMC Section 9.28.170(B)(2), lockers for clothing and other personal effects would be provided at a ratio of 75% of the long-term employee bicycle parking spaces required. Upon full Project implementation, PSJHC would have more than 90 new clothes lockers on its North Campus and more than 100 new clothes lockers on its South Campus. These

Policies	Analysis of Project Consistency
	Project Design Features would encourage the use of alternative modes of transportation and potentially reduce single occupancy vehicle trips and VMT.
LU12.4 Sustainability. Recognize adaptive reuse as a sustainable policy, and encourage sustainable technologies, such as solar panel installation and energy retrofitting, that respect character-defining features.	**Consistent.** During construction, the project applicant would implement a construction waste management plan to divert 70% of all mixed construction and demolition debris to a City certified construction and demolition waste processors, consistent with the City of Santa Monica Municipal Code Article 8, Chapter 8.108. During operation, Project buildings would be designed and operated to meet the applicable requirements of CALGreen and the City of Santa Monica Green Building Code. The Project would incorporate sustainability measures and performance standards. The Project would include easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics, metals, and landscaping debris (trimmings), consistent with the City of Santa Monica Zero Waste Strategic Plan. Sustainability strategies would include solar photovoltaic (PV) panels, solar water heating, green roofs, low-flow fixtures, high-performance building envelopes, energy-efficient HVAC and lighting systems, and interior materials with low volatile organic compounds (VOCs). Electric Vehicle (EV) Charging Stations would be provided throughout the North and South Campuses. All Project facilities with more than 50 parking spaces would provide at least two charging stations plus one for each additional 50 parking spaces consistent with SMMC Section 9.28.160(B)(2). Designated parking for carpools and vanpools would be provided throughout the North and South Campuses in accordance with SMMC Section 9.28.150. The Project will provide loading docks or dedicated delivery areas with electrical connections for delivery trucks with refrigeration units (TRU's) and require that all electric-capable TRU's utilize the connections within in use. These Project Design Features would reduce emissions associated with energy and transportation.
Land Use and Circulation Element – Circulation	
T18.1 Strive toward carbon neutrality by encouraging reduced Vehicle Miles Traveled (VMT) per capita.	**Consistent.** The Project's characteristics would reduce trips and VMT due to its infill location, access to public transportation within a quarter-mile of the Project Site, close proximity to multiple other destinations including job centers and retail uses. The Project would encourage alternative modes of transportation by implementing a TDM plan and installing long-term and short-term bicycle parking spaces. Upon full Project implementation, PSJHC would have more than 60 new short-term bicycle parking spaces and 120 new long-term bicycle parking spaces added to its North Campus and more than 100 new short-term spaces and more than 200 new long-term spaces added to its South Campus. Consistent with SMMC Section 9.28.170(B)(2), lockers for clothing and other personal effects would be provided at a ratio of 75% of the long-term employee bicycle parking spaces required. Upon full Project implementation, PSJHC would have more than 90 new clothes lockers on its North Campus and more than 100 new clothes lockers on its South Campus. The Applicant would also implement a comprehensive TDM plan to promote non-automobile travel and reduce the use of single-occupant vehicle trips. These features would reduce work trips and encourage employees and residents to use alternative modes of transportation including public transportation, walking, and bicycling.
T18.2 Develop programs and strategies to meet CO2 or VMT reduction standards established by regional, state or federal agencies.	**Consistent.** As discussed above, the Project's characteristics would reduce trips and VMT due to a variety of actions.
Land Use and Circulation Element – Sustainability and Climate Change	
S2.1 Implement the VMT reduction policies of the Land Use and Circulation Element of the General Plan including, but not limited to: focusing new growth in mixed-use, transit-oriented districts; focusing new growth long existing corridors and	**Consistent.** The Project's characteristics would reduce trips and VMT due to its infill location, access to public transportation within a quarter-mile of the Project Site, close proximity to multiple other destinations including job centers and retail uses. The Project would encourage

Policies	Analysis of Project Consistency
nodes; supporting the creation of complete, walkable neighborhoods with goods and services within walking distance of most homes; and, promoting and supporting a wide range of pedestrian, bicycle and transit improvements in the City.	alternative modes of transportation by implementing a TDM plan and installing long-term and short-term bicycle parking spaces. Upon full Project implementation, PSJHC would have more than 60 new short-term bicycle parking spaces and 120 new long-term bicycle parking spaces added to its North Campus and more than 100 new short-term spaces and more than 200 new long-term spaces added to its South Campus. Consistent with SMMC Section 9.28.170(B)(2), lockers for clothing and other personal effects would be provided at a ratio of 75% of the long-term employee bicycle parking spaces required. Upon full Project implementation, PSJHC would have more than 90 new clothes lockers on its North Campus and more than 100 new clothes lockers on its South Campus. The Applicant would also implement a comprehensive TDM plan to promote non-automobile travel and reduce the use of single-occupant vehicle trips. These features would reduce work trips and encourage employees and residents to use alternative modes of transportation including public transportation, walking, and bicycling.
S2.5 Expand the use of alternative fuel vehicles by providing fueling infrastructure and preferential parking in public locations, here feasible.	**Consistent**. Electric Vehicle (EV) Charging Stations would be provided throughout the North and South Campuses. All Phase II Project facilities with more than 50 parking spaces would provide at least two charging stations plus one for each additional 50 parking spaces consistent with SMMC Section 9.28.160(B)(2). Designated parking for carpools and vanpools would be provided throughout the North and South Campuses in accordance with SMMC Section 9.28.150. The Project will provide loading docks or dedicated delivery areas with electrical connections for delivery trucks with refrigeration units (TRU's) and require that all electric-capable TRU's utilize the connections within in use.
S3.2 Consider a requirement for all new residential buildings to use net zero energy by 2020 and all new commercial buildings by 2030.	**Consistent:** The Project would be designed and operated to meet the applicable requirements of CALGreen and the City of Santa Monica Green Building Code.
S5.1 Continue to maintain a building code and prescriptive compliance options that meet or exceed state requirements for energy, water and other sustainability standards. Specifically, pursue California Energy Commission goals to achieve "zero net" energy buildings by 2020 for low-rise residential buildings and 2030 for commercial buildings and achieve a LEED-equivalent local building code by 2020.	**Consistent:** The Project would be designed and operated to meet the applicable requirements of CALGreen and the City of Santa Monica Green Building Code.
S5.6 Encourage cool roofs or green roofs on new buildings.	**Consistent:** New buildings for the Project would incorporate surface materials with a high solar-reflectance-index average, coupled with roof assemblies having insulation factors that meet the 2016 California Title 24 Building Energy Efficiency Standards (or the most recent standards at the time of building permits) to reduce unwanted heat absorption and minimize energy consumption.
S5.8 Encourage installation of electrical outlets in loading zones and on the exterior of new buildings to reduce emissions from gas-powered landscape maintenance and operating refrigeration for delivery trucks.	**Consistent.** It is anticipated that the Project would include electrical outlets for electrical landscaping equipment.

SOURCE: ESA, 2019.

TABLE 4.2-7
COMPARISON OF THE PROJECT TO APPLICABLE AIR QUALITY-RELATED POLICIES OF THE *SUSTAINABLE CITY PLAN*

Goals and Targets	Analysis of Project Consistency
Sustainable City Plan – Resource Conservation	
Goal 1: Significantly decrease overall community consumption, specifically the consumption of non-local, non-renewable, non-recyclable and non-recycled materials, water, and energy and fuels.	**Consistent:** The Project would be designed and operated to meet the applicable requirements of CALGreen and the City of Santa Monica Green Building Code. The Project would also comply with the city's Green Building Ordinance and would include on-site recycling containers to support the city's recycling goal. In addition, during construction, the Project would be required to comply with Section 8.108.010 Subpart C of the Santa Monica Municipal Code, which requires that demolition and/or construction projects over 1,000 sf divert at least 70 percent of construction and demolition material from landfills.
Sustainable City Plan – Environment and Public Health	
Goal 1: Protect and enhance environmental health and public health by minimizing and where possible eliminating the levels of pollutants entering the air, soil and water.	**Consistent:** The Project would incorporate numerous project design features to reduce air pollutant emissions, including a suite of green building measures (see PDF-AQ-2), construction measures (see PDF-AQ-1), VOC reduction (PDF-AQ-3), require emergency generators to meet SCAQMD emissions standards (PDF-AQ-5), and additional actions to reduce emissions from construction and operational activities, vehicle idling, fuel use, and other activities. Implementation of MM-AIR-1, 2, and 3 would further reduce NOx and DPM emissions.
Sustainable City Plan – Transportation	
Goal 1: Create a multi-modal transportation system that minimizes and, where possible, eliminates pollution and motor vehicle congestion while ensuring safe mobility and access for all without compromising our ability to protect public health and safety	**Consistent.** As discussed above, the Project's characteristics would reduce trips and VMT due to its infill location, access to public transportation within a quarter-mile of the Project Site, close proximity to multiple other destinations including job centers and retail uses, and is mixed-use and pedestrian and bicycle-friendly. The Project would also provide access and pedestrian links to on-site uses from existing pedestrian pathways. Upon full Phase II Project implementation, PSJHC would have more than 60 new short-term bicycle parking spaces and 120 new long-term bicycle parking spaces added to its North Campus and more than 100 new short-term spaces and more than 200 new long-term spaces added to its South Campus. These features would reduce work trips and encourage employees and residents to use alternative modes of transportation including public transportation, walking, and bicycling.

SOURCE: ESA, 2019.

Criteria Pollutants

Impact AQ-2: *Would the project 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?*

Impact Statement AQ-2: The South Coast Air Basin is designated as non-attainment for O_3, PM10, and PM2.5 under federal and/or state ambient air quality standards. Construction and operation of the Project would generate emissions that would contribute to basin-wide air pollutant emissions. The Project would exceed regional NOx thresholds during construction and interim year operations. Therefore, the Project construction and interim operations would potentially contribute to a cumulatively considerable net increase of criteria pollutants and impacts would be potentially significant. Mitigation measures would be required. With implementation of mitigation measures, regional construction NOx emissions would be reduced below the SCAQMD's regional threshold. However, the Project's concurrent construction and interim operations would continue to exceed the regional NOx threshold and impacts would be temporarily significant and unavoidable.

Regional Construction Emissions

The Project would result in emissions of criteria air pollutants for which the region is in non-attainment during both construction and operation. The Air Basin fails to meet the NAAQS for O_3 and PM2.5, and therefore is considered a federal "non-attainment" area for these pollutants. The Air Basin also does not meet the CAAQS for PM10. The SCAQMD has designed significance thresholds to assist the region in attaining the applicable CAAQS and NAAQS, and apply to both primary (criteria and precursor) and secondary pollutants (ozone).

The maximum daily construction emissions were estimated for each Phasing Plan construction activity for each construction year, including when construction activities at different sites overlap. The maximum daily emissions are predicted values for the worst-case day and do not represent the emissions that would occur for every day of construction. The emissions calculations include dust control measures required to be implemented during each phase of construction, as required by SCAQMD Rule 403 (Control of Fugitive Dust). A summary of the maximum daily unmitigated construction emissions of the criteria pollutant calculations for each construction year are presented in **Table 4.2-8**, *Unmitigated Regional Maximum Daily Construction Emissions*. Detailed emissions calculations are provided in Appendix B.

As shown in Table 4.2-8, maximum daily construction NOx emissions would exceed the SCAQMD regional threshold for Phasing Plan A construction activities. In Phasing Plan A, the exceedance would occur during the overlapping phases of building construction at S2, the grading and excavation at both S1 and S3, and architectural coatings at S2 during the 2022 construction year. Therefore, Project construction could potentially be cumulatively considerable without mitigation.

For Phasing Plan B, maximum daily criteria air pollutant emissions would not exceed SCAQMD regional thresholds and as such, impacts, including cumulative, would be less than significant.

TABLE 4.2-8
UNMITIGATED REGIONAL MAXIMUM DAILY CONSTRUCTION EMISSIONS (POUNDS PER DAY) [A]

Construction Year	VOC	NO_X	CO	SO_2	PM10 [b]	PM2.5 [b]
Phasing Plan A						
2021	3	40	34	<1	3	2
2022	10	131	91	<1	11	5
2023	5	43	44	<1	8	3
2024	16	48	58	<1	8	4
2025	9	68	82	<1	7	3
2026	3	23	22	<1	4	1
2027	7	41	36	<1	7	2
2028	4	47	44	<1	7	3
2029	2	13	14	<1	3	1
2030	8	14	23	<1	4	1
2031	7	68	61	<1	27	7
2032	7	79	81	<1	10	3
2033	3	18	24	<1	5	1
2034	2	18	24	<1	5	1
2035	11	24	39	<1	6	2
2036	11	24	39	<1	6	2
2037	1	7	14	<1	2	1
2038	8	45	74	<1	6	2
2039	1	13	12	<1	3	1
2040	1	7	12	<1	3	1
2041	6	11	20	<1	3	1
Plan A Regional Maximum Daily Emissions	**16**	**131**	**91**	**<1**	**27**	**7**
SCAQMD Regional Construction Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	**Yes**	No	No	No	No
Phasing Plan B						
2021	3	40	34	<1	3	2
2022	3	13	19	<1	3	1
2023	4	52	45	<1	5	2
2024	2	14	16	<1	3	1
2025	9	21	26	<1	4	2
2026	9	97	97	<1	12	5
2027	6	79	70	<1	18	6
2028	15	44	54	<1	8	3
2029	11	67	81	<1	7	3

Construction Year	VOC	NO_X	CO	SO_2	PM10 [b]	PM2.5 [b]
2030	2	19	21	<1	4	1
2031	11	73	69	<1	28	7
2032	7	79	81	<1	10	3
2033	3	18	24	<1	5	1
2034	2	18	24	<1	5	1
2035	11	24	39	<1	6	2
2036	11	24	39	<1	6	2
2037	1	7	14	<1	2	1
2038	8	45	74	<1	6	2
2039	1	13	12	<1	3	1
2040	1	7	12	<1	3	1
2041	6	11	20	<1	3	1
Plan B Regional Maximum Daily Emissions	**15**	**97**	**97**	**<1**	**28**	**7**
SCAQMD Regional Construction Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	**No**	No	No	No	No

NOTES:
[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.
[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.
SOURCE: ESA 2019.

Regional Operational Emissions

The Project's operational emissions from area, energy, mobile, and stationary sources were estimated. Operational criteria pollutant emissions were calculated for the Project's interim year of operations in 2031, during which, operations from partial Project buildout would overlap with construction activities of Phase A4 (Buildings S4 & S5) and Phase A5 (Building 2D/E)]. As such, the Project's operation emissions and construction emissions during the interim year of 2031.

Results of the regional operational emissions analysis for the interim year 2031 are presented in **Table 4.2-9**, *Unmitigated Regional Maximum Daily Interim Year (2031) Operational Emissions*, which shows the net increase in operational-related daily emissions (Project emissions minus existing emissions) for the criteria and precursor pollutants (VOC, NO_X, CO, SO_X, PM10, and PM2.5). SCAQMD relies on its operational thresholds (rather than its construction thresholds) when construction and operations occur simultaneously. As indicated, combined operational and construction NO_x emissions would exceed the SCAQMD operational NO_x threshold of significance, while all other pollutants would be below their respective operational thresholds. Therefore, impacts are potentially cumulatively considerable. Therefore, this impact would be potentially significant and mitigation measures would be required.

TABLE 4.2-9
UNMITIGATED REGIONAL MAXIMUM DAILY INTERIM YEAR (2031) OPERATIONAL EMISSIONS (POUNDS PER DAY) [A]

Source	VOC	NO_X	CO	SO_2	PM10	PM2.5
Regional Emissions with Construction[b]						
Area (Consumer Products, Landscaping)	8	<1	1	<1	<1	<1
Energy (Natural Gas)	1	5	4	<1	<1	<1
Motor Vehicles	7	37	89	<1	45	12
Cogeneration Engines	1	1	1	<1	<1	<1
Emergency Generator	<1	1	3	<1	<1	<1
Construction Emissions	5	68	61	<1	27	7
Total Interim Year (2031) Emissions	21	111	160	1	72	20
Existing Interim Emissions to be Removed	4	15	37	<1	8	2
Total Net Interim Year Emissions	17	96	123	1	64	17
SCAQMD Regional Operational Thresholds	55	55	550	150	150	55
Exceeds Thresholds?	No	**Yes**	No	No	No	No
SCAQMD Regional Construction Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

NOTES:
[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.
[b] For the Interim Year (2031), both Phasing Plan A and Phasing Plan B construction schedules are the same during this year.

SOURCE: ESA 2019.

Calculations of the criteria pollutant emissions for the buildout year of the Project are presented in **Table 4.2-10**, *Unmitigated Regional Maximum Daily Full Buildout Operational Emissions*. The net increase in operational-related daily emissions (Project emissions minus existing emissions) would not exceed the SCAQMD thresholds at Full Buildout and impacts would be less than significant.

As shown in the tables above, the Project's increase in combined daily NOx emissions would exceed the SCAQMD threshold of significance during Interim Year 2031. Motor vehicles contribute the most to regional NOx emissions. However, the Project Site is located in proximity to two Expo Light Rail Stations, as well multiple bus routes within walking distance of the Project Site thus potentially decreasing the daily vehicle trips. The Project would also implement many of the transportation control measures that are utilized and assumed in the AQMP which would further have the potential to reduce daily vehicle trips, vehicle miles traveled, and regional peak-hour traffic congestion. Nonetheless, when evaluating the Project's combined construction and operation emissions during the Interim Year 2031 against the SCAQMD's regional operational significance thresholds, the Project would exceed the NOx threshold. Therefore, this impact would be potentially significant and mitigation measures would be required.

TABLE 4.2-10
UNMITIGATED REGIONAL MAXIMUM DAILY FULL BUILDOUT OPERATIONAL EMISSIONS (POUNDS PER DAY) [A]

Source	VOC	NO_X	CO	SO_2	PM10	PM2.5
Regional Emissions						
Area (Consumer Products, Landscaping)	15	<1	4	<1	<1	<1
Energy (Natural Gas)	1	7	6	<1	1	1
Motor Vehicles	7	47	95	1	60	16
Cogeneration Engines	1	1	1	<1	<1	<1
Emergency Generator	1	10	6	<1	<1	<1
Total Project Emissions	**24**	**65**	**112**	**1**	**61**	**17**
Existing Emissions to be Removed	4	14	33	<1	7	2
Total Net Project Emissions	**20**	**51**	**79**	**1**	**54**	**15**
SCAQMD Regional Operational Thresholds	55	55	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

NOTES:
[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.

SOURCE: ESA 2019.

Pollutant Concentrations

Impact AQ-3: *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Impact Statement AQ-3: The Project's localized maximum daily Project operational emissions of criteria air pollutants would not exceed the applicable SCAQMD localized concentration thresholds. Localized maximum daily Project construction emissions of criteria air pollutants of NO_X and PM10 would exceed the applicable SCAQMD localized concentration thresholds. Therefore, mitigation measures would be required for construction. With implementation of mitigation measures, localized construction impacts would be reduced to levels below SCAQMD significance thresholds, therefore, localized construction impacts would be less than significant with mitigation.

Project-generated traffic, together with other cumulative traffic in the area, would incrementally increase carbon monoxide levels at an intersection or roadway within one-quarter mile of a sensitive receptor. However, the Project would not cause or contribute to an exceedance of the CAAQS one-hour or eight-hour CO standards of 20 or 9.0 parts per million, respectively. Therefore, CO hotspot impacts would be less than significant.

During construction and operation of the Project, TACs would be emitted and result in an incremental cancer risk or cancer burden increase at nearby sensitive receptors. Project construction would exceed the applicable SCAQMD incremental cancer risk or cancer burden thresholds for TACs. Therefore, mitigation measures would be required. With implementation of mitigation measures, residential cancer risk would be reduced below the SCAMQD's 10 per million significance threshold, therefore impacts would be less than significant with mitigation.

Localized Construction Emissions

The localized impacts for the short-term construction activities were analyzed using an air dispersion model (EPA AERMOD Model) to simulate the transport and dispersion of project-related emissions through the air. These impacts were then compared to the applicable SCAQMD LSTs. As previously discussed, SCAQMD recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of the Project. The results of the analysis are presented in **Table 4.2-11** *Unmitigated Localized Assessment of Phasing Plan A Construction Emissions* and **Table 4.2-12,** *Unmitigated Localized Assessment of Phasing Plan B Construction Emissions.*

TABLE 4.2-11
UNMITIGATED LOCALIZED ASSESSMENT OF PHASING PLAN A CONSTRUCTION EMISSIONS

			Air Concentration			
Pollutant	**Averaging Time, units**	**Existing Background[a]**	**Project Local Increase**	**Total (Background + Project)**	**Standard/Threshold**	**Total Impact Exceeds Threshold**
Carbon Monoxide	1 hour, ppm	2.2	0.6	3.3	20.0	No
	8 hour, ppm	1.4	0.3	1.8	9.0	No
Nitrogen Dioxide	State 1 hour, ppm	0.068	0.100	0.167	0.180	No
	National 1 hour, ppm	0.054	0.068	0.121	0.100	Yes
	Annual, ppm	0.013	0.010	0.024	0.030	No
PM10	24 hour, $\mu g/m^3$	NA	4.7	4.7	10.4	No
	Annual, $\mu g/m^3$	NA	1.7	1.7	1.0	Yes
PM2.5	24 hour, $\mu g/m^3$	NA	4.3	4.3	10.4	No

NOTES:
$\mu g/m^3$ = micrograms per cubic meter (a concentration unit)
NA = Not Applicable, the SCAQMD threshold methodology does not require a background for PM10 or PM2.5
[a] Background data for CO and nitrogen dioxide derived as the highest air quality measured data over a 3-year rolling average from 2014-2017.
SOURCE: ESA 2019.

As shown in Table 4.2-11 and Table 4.2-12, localized maximum daily Project construction emissions would exceed SCAQMD LSTs for the 1-hour NO_X and annual PM10 for Phasing Plan A and Phasing Plan B. Therefore, mitigation measures would be required.

TABLE 4.2-12
UNMITIGATED LOCALIZED ASSESSMENT OF PHASING PLAN B CONSTRUCTION EMISSIONS

Pollutant	Averaging Time, units	Existing Background[a]	Air Concentration: Project Local Increase	Air Concentration: Total (Background + Project)	Standard/Threshold	Total Impact Exceeds Threshold
Carbon Monoxide	1 hour, ppm	2.2	0.6	2.8	20.0	No
	8 hour, ppm	1.4	0.3	1.7	9.0	No
Nitrogen Dioxide	State 1 hour, ppm	0.068	0.090	0.158	0.180	No
	National 1 hour, ppm	0.054	0.066	0.120	0.100	Yes
	Annual, ppm	0.013	0.007	0.020	0.030	No
PM10	24 hour, $\mu g/m^3$	NA	5.1	5.1	10.4	No
	Annual, $\mu g/m^3$	NA	2.2	2.2	1.0	Yes
PM2.5	24 hour, $\mu g/m^3$	NA	3.2	3.2	10.4	No

NOTES:
$\mu g/m^3$ = micrograms per cubic meter (a concentration unit)
NA = Not Applicable, the SCAQMD threshold methodology does not require a background for PM10 or PM2.5
[a] Background data for CO and nitrogen dioxide derived as the highest air quality measured data over a 3-year rolling average from 2014-2016.
SOURCE: ESA 2019.

Localized Operational Emissions

The localized impacts for the short-term construction activities were analyzed using an air dispersion model (EPA AERMOD Model) to simulate the transport and dispersion of Project-related emissions through the air. These impacts were then compared to the applicable SCAQMD LSTs. As previously discussed, SCAQMD recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of the Project Site. The results of the analysis are presented in **Table 4.2-13,** *Unmitigated Localized Assessment of Project Buildout Operational Emissions.*

As shown in Table 4.2-13, the increase in maximum localized operational emissions for sensitive receptors would not exceed the localized thresholds for NO_X, CO, PM10, and PM2.5. Therefore, impacts relating to localized operational emissions would be less than significant.

Carbon Monoxide Hotspots

The potential for the Project to cause or contribute to CO hotspots is evaluated by comparing Project intersections (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs and considering existing background CO concentrations. As discussed below, this comparison demonstrates that the Project would not cause or contribute considerably to the formation of CO hotspots, that CO concentrations at Project impacted intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required.

TABLE 4.2-13
UNMITIGATED LOCALIZED ASSESSMENT OF PROJECT BUILDOUT OPERATIONAL EMISSIONS

Pollutant	Averaging Time, units	Existing Background[a]	Air Concentration: Project Local Increase	Air Concentration: Total (Background + Project)	Standard/Threshold	Total Impact Exceeds Threshold
Carbon Monoxide	1 hour, ppm	2.2	0.1	2.3	20.0	No
	8 hour, ppm	1.4	0.1	1.5	9.0	No
Nitrogen Dioxide	State 1 hour, ppm	0.068	0.036	0.104	0.180	No
	National 1 hour, ppm	0.054	0.030	0.084	0.100	No
	Annual, ppm	0.013	0.002	0.016	0.030	No
PM10	24 hour, $\mu g/m^3$	n/a	1.2	1.2	10.4	No
	Annual, $\mu g/m^3$	n/a	0.6	0.6	1.0	No
PM2.5	24 hour, $\mu g/m^3$	n/a	1.2	1.2	10.4	No

NOTES:
$\mu g/m^3$ = micrograms per cubic meter (a concentration unit)
NA = Not Applicable, the SCAQMD threshold methodology does not require a background for PM10 or PM2.5
[a] Background data for CO and nitrogen dioxide derived as the highest air quality measured data over a 3-year rolling average from 2014-2016.
SOURCE: ESA 2019.

As shown previously in Table 4.2-2, CO levels in the Project area are substantially below the federal and state standards. Maximum CO levels in recent years are 2.2 ppm (one-hour average) and 1.4 ppm (eight-hour average) compared to the CAAQS of 20 ppm (one-hour average) and 9.0 ppm (eight-hour average). CO levels decreased dramatically in the Air Basin with the introduction of the catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the Air Basin for some time, and the Air Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Thus, it is not expected that CO levels at Project-impacted intersections would rise to the level of an exceedance of these standards.

Additionally, SCAQMD conducted CO modeling for the attainment demonstration in the 2003 AQMP for the four worst-case intersections in the Air Basin, including: (1) Wilshire Boulevard and Veteran Avenue; (2) Sunset Boulevard and Highland Avenue; (3) La Cienega Boulevard and Century Boulevard; and (4) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of approximately 100,000 vehicles per day (SCAQMD 2003b). This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue, exclusive of ambient background CO concentrations.

When added to the existing background CO concentrations, the screening values would be 7.6 ppm (one-hour average) and 5 ppm (eight-hour average).[9]

Based on the Project's associated Traffic Study, of the studied intersections that are predicted to operate at a Level of Service (LOS) of D, E or F under future operational year (2042) plus Project conditions, the intersection of Bundy Drive and Olympic Boulevard would have peak traffic volumes of approximately 60,010 per day (Fehr and Peers, 2019, FHWA 2019). As a result, CO concentrations are expected to be less than those estimated in the 2003 AQMP, which would not exceed the thresholds. Total traffic volumes at the maximum impacted intersection would likely have to more than double to cause or contribute to a CO hotspot impact given that vehicles operating today have reduced CO emissions as compared to vehicles operating in year 2003 when the SCAQMD conducted the AQMP attainment demonstration modeling. Thus, this comparison demonstrates that the Project would not contribute considerably to the formation of CO hotspots and no further CO analysis is required. The Project would result in less than significant impacts with respect to CO hotspots.

Toxic Air Contaminants

Construction Impacts

The resulting health risk calculations were performed using a spreadsheet tool consistent with the OEHHA guidance. The spreadsheet tool incorporates the algorithms, equations, and a variable described above as well as in the OEHHA Guidance, and incorporates the results of the AERMOD dispersion model. **Table 4.2-14,** *Phasing Plan A Unmitigated Maximum Health Impacts for Off-Site Sensitive Receptors***, and Table 4.2-15,** *Phasing Plan B Unmitigated Maximum Health Impacts for Off-Site Sensitive Receptors***,** below summarize the carcinogenic risk for the maximum impacted sensitive receptors.

TABLE 4.2-14
PHASING PLAN A UNMITIGATED MAXIMUM HEALTH IMPACTS FOR OFF-SITE SENSITIVE RECEPTORS

Construction Plan A	Maximum Cancer Risk (# in 1 million)	Chronic Hazard Index
Receptor Type		
Residential	**200**	0.12
School-Students	**6.2**	0.01
Maximum Individual Cancer Risk Threshold	10.0	1.0
Exceeds Threshold?	**Yes, for residential**	No

SOURCE: ESA 2019. Health risk calculations are provided in Appendix B.

[9] The eight-hour average is based on a 0.7 persistence factor, as recommended by the SCAQMD.

TABLE 4.2-15
PHASING PLAN B UNMITIGATED MAXIMUM HEALTH IMPACTS FOR OFF-SITE SENSITIVE RECEPTORS

Construction Plan B	Maximum Cancer Risk (# in 1 million)	Chronic Hazard Index
Receptor Type		
Residential	**111.4**	0.11
School-Students	5.0	0.001
Maximum Individual Cancer Risk Threshold	10.0	1.0
Exceeds Threshold?	**Yes, for residential**	No

SOURCE: ESA 2019. Health risk calculations are provided in Appendix B.

For carcinogenic exposures, the cancer risk from DPM emissions from construction of both Phasing Plan A and B scenarios of the Project is estimated to result in a maximum carcinogenic risk at the residential land uses on the southern portion of the Project Site between Phase A (Buildings S1 and S3) and Phase C (Buildings S4 and S5). The cancer risk from DPM emissions from construction under Plan A would also have a maximum carcinogenic risk at the school land uses (students) located northeast of the Project Site, east of Phase E (Building 2D/E). As discussed previously, the lifetime exposure under the OEHHA Guidance takes into account early life (infant and children) exposure. The calculated cancer risk is estimated for outdoor exposure and assumes that sensitive receptors (residential uses) would not have any mitigation such as mechanical filtration and that residential uses would have continuously open windows. As the maximum impact would be greater than the risk threshold of 10.0 in one million, impacts would be potentially significant and mitigation measures would be required. Potential non-cancer effects of chronic (i.e., long term) DPM exposures were evaluated using the Hazard Index approach as described in the OEHHA Guidance. A hazard index equal to or greater than 1.0 represents a significant chronic health hazard.

Operational Impacts

The SCAQMD recommends that operational health risk assessments be conducted for substantial sources of operational DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[10] Project operations would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance activities that would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, Project trucks are required to comply with the applicable provisions of the CARB Truck and Bus regulation to minimize and reduce PM and NO_X emissions from existing diesel trucks. Therefore, the Project operations would not be considered a substantial source of diesel particulates.

In addition, Project operations would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings and the

[10] SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2002. http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. Accessed September 2018.

maintenance and testing of diesel-fueled emergency generators. Area sources that would generate TAC emissions include consumer products associated with re-applying architectural coatings and cleaning building surfaces. The emergency generators would be subject to SCAQMD's Rule 1470. Each emergency generator would have a maximum of 50 operational hours per year for maintenance and testing activities, thus resulting in minimal DPM emissions.

With respect to the use of consumer products and architectural coatings, the residential and commercial uses associated with the Project would be expected to generate minimal emissions from these sources. The Project's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled, and would not be expected to exceed the SCAQMD significance threshold. Therefore, impacts would be less than significant. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities. The Project would not include any of these potential sources, although minimal emissions may result from the use of consumer products (e.g., aerosol sprays). Therefore, the Project is not expected to release substantial amounts of TACs, and less than significant impacts on human health would occur.

Other Emissions Including Odors

Impact AQ-4: *Would the project result in other emissions (such as those leading to odors affecting a substantial number of people?*

Impact Statement AQ-4: The Project's land uses are related to hospital uses and are not expected to introduce substantial sources of other emissions including odors and is not associated with any land uses or operations that are associated with odor complaints. Therefore, Project construction and operations would not create other emissions such as odors affecting a substantial number of people and impacts would be less than significant.

Construction

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD Rule 1113 (Architectural Coatings) limits the amount of VOCs from architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. Odors from the combustion of diesel fuel would be minimized by complying with the CARB ATCM that limits diesel-fueled commercial vehicle idling to 5 minutes at any given location, which was adopted in 2004. The Project would also comply with SCAQMD Rule 402 (Nuisance), which prohibits the emissions of nuisance air contaminants or odorous compounds. Through adherence with mandatory compliance with SCAQMD Rules and State measures, construction activities and materials would not create objectionable odors. Construction of the Project's proposed uses would not be expected to generate nuisance odors at nearby sensitive receptors.

Operations

The Project's land uses are related to hospital uses and are not expected to introduce substantial sources of other emissions, including odors. 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 elements related to these types of uses. The Project would include various trash receptacles associated with the proposed development. On-site trash receptacles used by the Project would be covered and properly maintained to prevent adverse odors. With proper housekeeping practices, trash receptacles would be maintained in a manner that promotes odor control, and no adverse odor impacts are anticipated from the uses. Impacts with respect to odors would be less than significant.

4.2.4.5 Cumulative Impacts

The Project would not conflict with or obstruct implementation of the AQMP, and impacts would be less than significant, and not result in a cumulative impact.

Since Project construction emissions under Phasing Plan A would exceed the SCAQMD's regional significance thresholds for NOx, construction impacts may be cumulatively considerable, and impacts would be potentially significant requiring mitigation measures. However, as shown in Table 4.2-16 below, with implementation of MM-AIR-1, Project construction emissions for Phasing Plan A would be reduced to levels below the SCAQMD regional thresholds. Therefore, Project construction would not result in a cumulatively considerable net increase for non-attainment pollutants or ozone precursors, and would result in a less than significant cumulative impact with mitigation. Therefore, Project construction emissions would not result in a cumulative impact.

Project regional NOx emissions (combined operational and construction emissions during the Interim Year 2031) would exceed the SCAQMD operational threshold of significance for NOx, while all other pollutants would be below their respective operational thresholds. Therefore, operational impacts would be potentially cumulatively considerable, resulting in a potentially significant impact, and mitigation measures would be required. As shown in Table 4.2-21, with implementation of MM-AIR-1, Interim Year (2031) NO_X emissions would be reduced, however, total combined NO_X emissions would still exceed the SCAQMD regional threshold for NOx. Therefore, operational impacts would be significant and unavoidable with mitigation, resulting in a significant and unavoidable cumulative impact.

Project construction would not expose sensitive receptors to substantial pollutant concentrations and would result in a less than significant impact with mitigation, and therefore, would not result in a cumulative impact.

For toxic air contaminants, residential cancer risk would be reduced below the SCAMQD's 10 per million significance threshold with mitigation, and therefore, would not result in a cumulative impact.

Project construction and operation would not be expected to generate nuisance odors at nearby sensitive receptors, and therefore, would not result in a cumulative odor impact.

4.2.5 Mitigation Measures

4.2.5.1 Construction

The Project would result in potentially significant construction impacts associated with regional and localized emissions, as well as health impacts. Therefore, the following mitigation measure shall be implemented for the Project's construction.

MM AIR-1: Construction equipment operating at each Phase II development site shall be subject to the following requirements, which will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment:

- The Project shall require all off-road diesel equipment greater than 50 horsepower (hp) to meet USEPA Tier 4 Final off-road emission standards (or equivalent) to reduce diesel particulate matter and NO_X emissions during construction activities. If equipment cleaner than Tier 4 is widely and commercially available at the time of building permit issuance, the Project applicant shall require the use of such equipment for construction.
- Dumpers/tenders, forklifts, pumps, sweeper/scrubbers and plate compactors shall be powered by non-diesel fuels, such as gasoline, compressed natural gas or electricity.

4.2.5.2 Operations

The Project would result in significant operational impacts associated with regional NOx emissions during the Project's interim year of 2031 primarily due to the fact that construction emissions would simultaneously occur when part of the Project is operational. Construction emissions alone during the interim year exceed the SCAQMD regional operational thresholds. When construction and operational activities of a project overlap, the SCAQMD requires the use of operational thresholds. Although construction emissions during the interim year are mitigated to less than significant levels, mitigation measures are not available to reduce combined emissions to less than significant levels.

4.2.6 Level of Significance After Mitigation

4.2.6.1 Construction

Regional Construction

As shown in **Table 4.2-16**, *Mitigated Regional Maximum Daily Construction Emissions*, with implementation MM AIR-1, the Project's regional construction NOx emissions for Phasing Plan A would be reduced below the SCAQMD's significance thresholds for NOx. Phasing Plan B's emissions would be further reduced. Furthermore, the Project's regional construction emissions for both construction plans would be less than the SCAQMD's significance thresholds for all criteria pollutants and ozone precursors, therefore, impacts would be mitigated to less than significant.

TABLE 4.2-16
MITIGATED REGIONAL MAXIMUM DAILY CONSTRUCTION EMISSIONS (POUNDS PER DAY) [A]

Construction Year	VOC	NO_X	CO	SO_2	PM10 [b]	PM2.5 [b]
Phasing Plan A						
2021	2	21	45	<1	2	1
2022	6	95	121	<1	9	3
2023	3	24	59	<1	7	2
2024	12	20	76	<1	7	2
2025	7	39	105	<1	6	2
2026	1	15	35	<1	4	1
2027	6	31	46	<1	6	2
2028	2	33	60	<1	6	2
2029	1	7	17	<1	3	1
2030	7	9	30	<1	3	1
2031	6	58	74	<1	27	7
2032	4	62	111	<1	10	3
2033	1	12	38	<1	5	1
2034	1	12	37	<1	5	1
2035	9	15	68	<1	6	2
2036	9	15	68	<1	6	2
2037	1	4	18	<1	2	<1
2038	5	32	100	<1	6	2
2039	1	9	16	<1	3	1
2040	1	5	15	<1	3	1
2041	5	7	10	<1	3	1
Plan A Regional Maximum Daily Emissions	12	95	121	<1	27	7
SCAQMD Regional Construction Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Phasing Plan B						
2021	2	21	46	<1	2	1
2022	2	7	28	<1	2	1
2023	2	35	61	<1	4	1
2024	1	7	19	<1	3	1
2025	7	11	31	<1	4	1
2026	7	65	126	<1	10	3
2027	3	58	92	<1	17	5
2028	12	20	67	<1	7	2
2029	9	37	103	<1	6	2

Construction Year	VOC	NO_X	CO	SO_2	PM10 [b]	PM2.5 [b]
2030	1	13	30	<1	4	1
2031	8	60	85	<1	27	7
2032	4	62	110	<1	10	3
2033	1	12	38	<1	5	1
2034	1	12	37	<1	5	1
2035	9	15	68	<1	6	2
2036	9	15	68	<1	6	2
2037	1	4	18	<1	2	<1
2038	5	13	92	<1	3	1
2039	1	9	15	<1	3	1
2040	1	5	15	<1	3	1
2041	5	7	10	<1	3	1
Plan B Regional Maximum Daily Emissions	12	65	126	<1	27	7
SCAQMD Regional Construction Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

NOTES:
[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.
[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA 2019.

Localized Construction

As shown in **Table 4.2-17**, *Mitigated Localized Assessment of Phasing Plan A Construction Emissions*, and **Table 4.2-18**, *Mitigated Localized Assessment of Phasing Plan B Construction Emissions*, with implementation of MM AIR-1, localized maximum Project construction emissions for Plan A and Plan B would not exceed SCAQMD localized construction emissions. Therefore, impacts would be less than significant with mitigation.

TABLE 4.2-17
MITIGATED LOCALIZED ASSESSMENT OF PHASING PLAN A CONSTRUCTION EMISSIONS

Pollutant	Averaging Time, units	Existing Background[a]	Air Concentration: Project Local Increase	Air Concentration: Total (Background + Project)	Standard/Threshold	Total Impact Exceeds Threshold
Carbon Monoxide	1 hour, ppm	2.2	0.7	2.9	20.0	No
	8 hour, ppm	1.4	0.3	1.7	9.0	No
Nitrogen Dioxide	State 1 hour, ppm	0.068	0.038	0.105	0.180	No
	National 1 hour, ppm	0.054	0.026	0.080	0.100	No
	Annual, ppm	0.013	0.003	0.016	0.030	No
PM10	24 hour, $\mu g/m^3$	NA	1.5	1.5	10.4	No
	Annual, $\mu g/m^3$	NA	0.5	0.5	1.0	No
PM2.5	24 hour, $\mu g/m^3$	NA	1.3	1.3	10.4	No

NOTES:
$\mu g/m^3$ = micrograms per cubic meter (a concentration unit)
NA = Not Applicable, the SCAQMD threshold methodology does not require a background for PM10 or PM2.5
[a] Background data for CO and nitrogen dioxide derived as the highest air quality measured data over a 3-year rolling average from 2014-2017.
SOURCE: ESA 2019.

TABLE 4.2-18
MITIGATED LOCALIZED ASSESSMENT OF PHASING PLAN B CONSTRUCTION EMISSIONS

Pollutant	Averaging Time, units	Existing Background[a]	Air Concentration: Project Local Increase	Air Concentration: Total (Background + Project)	Standard/Threshold	Total Impact Exceeds Threshold
Carbon Monoxide	1 hour, ppm	2.2	0.9	3.1	20.0	No
	8 hour, ppm	1.4	0.4	1.8	9.0	No
Nitrogen Dioxide	State 1 hour, ppm	0.0648	0.030	0.097	0.180	No
	National 1 hour, ppm	0.054	0.022	0.076	0.100	No
	Annual, ppm	0.013	0.002	0.015	0.030	No
PM10	24 hour, $\mu g/m^3$	NA	2.8	2.8	10.4	No
	Annual, $\mu g/m^3$	NA	0.9	0.9	1.0	No
PM2.5	24 hour, $\mu g/m^3$	NA	1.1	1.1	10.4	No

NOTES:
$\mu g/m^3$ = micrograms per cubic meter (a concentration unit)
NA = Not Applicable, the SCAQMD threshold methodology does not require a background for PM10 or PM2.5
[a] Background data for CO and nitrogen dioxide derived as the highest air quality measured data over a 3-year rolling average from 2014-2016.
SOURCE: ESA 2019.

Toxic Air Contaminants

As shown in **Table 4.2-19**, *Phasing Plan A Mitigated Maximum Carcinogenic Risk for Off-Site Sensitive Receptors*, and **Table 4.2-20**, *Phasing Plan B Mitigated Maximum Carcinogenic Risk for Off-Site Sensitive Receptors*, residential cancer risk for Phasing Plan A and Phasing Plan B would be reduced significantly with implementation of MM-AIR-1 and would not exceed the SCAQMD threshold of 10 per million. Therefore, health risk impacts would be less than significant with mitigation.

TABLE 4.2-19
PHASING PLAN A MITIGATED MAXIMUM CARCINOGENIC RISK FOR OFF-SITE SENSITIVE RECEPTORS

Construction Plan A	Maximum Cancer Risk (# in 1 million)
Receptor Type	
Residential	**8.7**
Maximum Individual Cancer Risk Threshold	10.0
Exceeds Threshold?	**No**

SOURCE: ESA 2019. Health risk calculations are provided in Appendix B

TABLE 4.2-20
PHASING PLAN B MITIGATED MAXIMUM CARCINOGENIC RISK FOR OFF-SITE SENSITIVE RECEPTORS

Construction Plan A	Maximum Cancer Risk (# in 1 million)
Receptor Type	
Residential	**1.9**
Maximum Individual Cancer Risk Threshold	10.0
Exceeds Threshold?	**No**

SOURCE: ESA 2019. Health risk calculations are provided in Appendix B

Localized Construction

As shown above in Table 4.2-17 and Table 4.2-18, with implementation of MM-AIR-1, Project construction emissions for Phasing Plan A and Phasing Plan B would be reduced to levels below the SCAQMD localized significance thresholds and therefore, are not expected to result in ground level concentrations that exceed the NAAQS or CAAQS. Therefore, Project construction would not expose sensitive receptors to substantial pollutant concentrations would result in a less than significant impact with mitigation.

Toxic Air Contaminants

As shown in Table 4.2-19 and Table 4.2-20, residential cancer risk would be reduced below the SCAMQD's 10 per million significance threshold, therefore impacts would be less than significant with mitigation.

4.2.6.2 Operation

As shown in **Table 4.2-21**, *Mitigated Regional Maximum Daily Interim Year (2031) Operational Emissions*, with implementation of MM-AIR-1, Interim Year (2031) NO_X emissions would be reduced, however, total NO_X emissions would still exceed SCAQMD regional thresholds. Therefore, project and cumulative operational regional impacts would be significant and unavoidable, even with implementation of mitigation.

TABLE 4.2-21
MITIGATED REGIONAL MAXIMUM DAILY INTERIM YEAR (2031) OPERATIONAL EMISSIONS (POUNDS PER DAY) [A]

Source	VOC	NO_X	CO	SO_2	PM10	PM2.5
Regional Emissions with Construction[b]						
Area (Consumer Products, Landscaping)	8	<1	1	<1	<1	<1
Energy (Natural Gas)	1	5	4	<1	<1	<1
Motor Vehicles	7	37	89	<1	45	12
Cogeneration Engines	1	1	1	<1	<1	<1
Emergency Generator	<1	1	3	<1	<1	<1
Construction Emissions	3	58	74	<1	27	7
Total Interim Year (2031) Emissions	19	102	173	1	72	19
Existing Interim Emissions to be Removed	4	15	37	<1	8	2
Total Net Interim Year Emissions	**15**	**86**	**136**	**1**	**64**	**17**
SCAQMD Regional Operational Thresholds	55	55	550	150	150	55
Exceeds Thresholds?	No	**Yes**	No	No	No	No
SCAQMD Regional Construction Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

NOTES:
[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.
[b] For the Interim Year (2031), both Phasing Plan A and Phasing Plan B construction schedules are the same during this year.

SOURCE: ESA, 2019.

4.3 Construction Effects

4.3.1 Introduction

This analysis evaluates the effects of Project construction on the sensitive uses in the Project vicinity. Although construction activities are temporary and common in urban environments, nearby sensitive uses around a construction site may be adversely affected by construction-related impacts associated with aesthetics, air quality, noise and vibration, and transportation. While construction effects associated with these issues are analyzed fully in the individual sections in Sections 4.1, 4.2, 4.13 and 4.17, respectively, of this EIR, the conclusions of those analyses are also summarized here for ease of understanding the full range of the Project's construction-related impacts on sensitive uses. Other construction effects that do not affect sensitive populations are discussed in Sections 4.4, *Historical Resources*, 4.5, *Archaeological/Paleontological Resources*, 4.7, *Geology and Soils*, 4.8, *Greenhouse Gas Emissions*, 4.10, *Hydrology and Water Quality*, 4.18, *Tribal Cultural Resources*, and 4.21, *Solid Waste*, of this EIR.

4.3.2 Environmental Setting

4.3.2.1 Project Site

As indicated in Figures 2-1 and 2-2 in Chapter 2, *Project Description*, of this EIR, the Project Site is located within the central portion of the City and includes Phase II Development Sites totaling approximately 401,700 sf. The Project Site is located within the greater approximately 20.72-acre PSJHC Campus. The Campus is generally bounded by Arizona Avenue in the north, Broadway in the south, 22nd and 23rd Streets in the east, and 20th Street in the west, and is bisected by Santa Monica Boulevard that separates the Campus into North and South Campuses.

Much of the North Campus was the site of the PSJHC Phase I Project that included construction of the replacement Saint John's Hospital Building and other medical buildings under a 1998 Development Agreement. Phase II is proposed as the second installment of the improvements planned and vested at the PSJHC Campus under the 1998 DA and subsequent amendments. The two City blocks bound by Arizona Avenue, Broadway, and 20th and 23rd Streets, which contain the PSJHC Campus, also contain other uses (e.g., medical office buildings, Verizon Building, and residential buildings), some of which are owned by PSJHC.

The Project Site and greater Campus are located in the City's Healthcare District and the Central City portion of the Mid-City Neighborhood that contain PSJHC, Santa Monica-UCLA Medical Center (SM-UCLA), other medical, medical office, commercial, school, and residential uses. The nine Phase II Development Sites are split between the North and South Campuses, with four of the development sites in the North Campus and five in the South Campus.

The Project Site is currently fully developed with urban uses of up to two stories above-grade, including buildings associated with PSJHC (e.g., Child & Family Development Center (CFDC), Providence Saint John's Foundation Building, John Wayne Cancer Institute), two temporary MRI modular buildings, a 10-unit vacant apartment building, Mullin Plaza, several surface parking lots, and infrastructure improvements.

4.3.2.2 Surrounding Land Uses

The area immediately surrounding the Project Site consists of a mixture of primarily commercial (including medical) buildings on 20th Street, Santa Monica Boulevard and Broadway; and primarily multifamily residential buildings on Arizona Avenue, 21st Street, and 23rd Street. Development adjacent to/across from the Project Site includes the following:

- Arizona Avenue north of the PSJHC North Campus: A four-story hotel (The Ambrose) and multi-family and single-family residential ranging from one to four stories;
- 23rd Street to the east of the PSJHC North Campus, between Arizona Avenue and Santa Monica Boulevard: Mainly of single- and multi-family residential uses, ranging from one to two stories, and a restaurant on the corner of 23rd Street and Santa Monica Boulevard;
- 23rd Street to the east of the PSJHC North Campus, between Santa Monica Avenue and Broadway: Single-story commercial buildings and surface parking lots near Santa Monica Boulevard and single- and multi-family residential uses ranging from one to four stories;
- Santa Monica Boulevard, south of the PSJHC North Campus: The PSJHC South Campus (John Wayne Cancer Institute and two temporary MRI modular buildings), the Saint John's Health Center, a bank, and medical offices.
- 20th Street to the southwest of the PSJHC North Campus, between Santa Monica Boulevard and Colorado Avenue: Multi-family residential (ranging from two to three stories), the Gateway Hotel, Frontier Communications, Big Jo's Restaurant, Calvary Baptist Church, VCA Dog and Cat Hospital, the Lighthouse Christian Preschool, and Saint Anne's School.

The PSJHC Phase I Project buildings range in height up to 12 stories, while the buildings surrounding the Campus range in height up to eight stories, with most from between one and four stories. The majority of buildings surrounding the Project Site are older buildings, with the exception of the PSJHC Phase I Project buildings, several medical office buildings and hotels on 20th Street, and the Berkley East Convalescent Center on Arizona Avenue.

4.3.2.3 Sensitive Land Uses

Several land use types are considered more sensitive to construction effects, such as air pollution and noise, than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, particularly those with cardio-respiratory diseases. Residential uses are also considered to be sensitive to construction impacts because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Commercial and light-industrial uses, on the other hand, are considered to be much less sensitive to construction impacts because employees and visitors tend to avoid the outdoors and do not typically reside for extended periods of time (e.g., overnight), thereby reducing their exposure to harmful effects. The following are identified in Sections 4.2, *Air Quality*, and/or 4.13, *Noise*, as sensitive land uses in proximity to the Project Site:

- Residential Dwellings: Low-rise single-family homes are interspersed with multi-family residential buildings in the Project vicinity. Residential uses are located immediately adjacent to the north and approximately 60-200 feet northeast of Site S2, approximately 50-300 feet

northeast of Site 2D/E, approximately 640 feet north of Site 2C and Mullin Plaza, and approximately 90 feet west and 350 feet north of Site 2I.

- Senior Living Facilities: Geneva Plaza, a senior living residential complex (1441 21st Street) lies in the South Campus, encircled by Sites S1, S3, S4, and S5. Specifically, this building is located immediately adjacent and west of Site S5, approximately 40 feet northeast of Site S1, 70 feet to the east of Site S3, and immediately southeast of Site S4. The Rehabilitation Center of Santa Monica (1338 20th Street) and the Santa Monica Health Care Center (1320 20th Street) are located approximately 70 feet to the southwest of Site 2I and 380 feet to the southwest of Site 2C.

- Schools: McKinley Elementary School is located approximately 210 feet northeast of Site 2D/E. Lighthouse Preschool is located approximately 230 feet the southwest of Site S1. Saint Anne School is located approximately 425 feet southwest of Site S1.

4.3.2.4 Existing Setting by Environmental Topic

This following discussion provides a summary of the setting conditions that are related to the construction impacts for each of the environmental topics discussed in this section. For more in-depth descriptions of the existing setting, please see Sections 4.1, *Aesthetics*, 4.2, *Air Quality*, 4.13, *Noise and Vibration*, and 4.17, *Transportation*.

Aesthetics

Site 2C

Site 2C is located on the North Campus along Santa Monica Boulevard. This area is currently developed with a surface parking lot (the West Lot), adjacent to Mullin Plaza. The perimeter of the parking lot is fronted with trees and a landscaped grass median and a number of trees are interspersed in the surface parking lot. Although the landscaping and vegetation assists in screening views of the parking lot and vehicles, Site 2C has low visual quality.

Mullin Plaza

Mullin Plaza is located between Sites 2C and 2D/E on the North Campus (see Photograph 2 in Figure 4.1-1). Completed in 2013, Mullin Plaza serves as a prominent formal entrance to PSJHC main building. Mullin Plaza includes a one-way semi-circle driveway with the ingress driveway from Santa Monica Boulevard on the east and the egress driveway to Santa Monica Boulevard on the west. Within the semicircular driveway, there is approximately 17,700 sf of open space which includes tall Mexican feather grass along with Chinese Elms, Canary Island pines, ginkgo trees, peppermint willows and other drought-tolerant plants. Additionally, there is a hedge maze along the front of the building that leads into the Gloria and Jimmy Steward Rose Garden.

Adjacent to the sidewalk along Santa Monica Boulevard is a pedestrian pathway framed by small landscaped “mounds” and perimeter trees. Visible beyond Mullin Plaza to the north, is the main façade of the Phase I Howard Keck Building that includes a distinctive sweeping arc-shaped façade that incorporates a prominent cross inlaid within horizontal ribbons of glass and concrete. Overall, Mullin Plaza is considered to have a high-level of visual quality relative to the surrounding urban uses.

Site 2D/E

Site 2D/E on the North Campus is developed with a surface parking lot (Lot C) and a one to two-story concrete office building (the PSJHC Foundation building) located at the corner of Santa Monica Boulevard and 23rd Street (2221 Santa Monica Boulevard). To the south of the office building, partially fronting Santa Monica Boulevard, is a small plaza/siting area with seating covered by an orange trellis. The main facade of the office building fronting Santa Monica is lined with a decorative "green wall" vertical planting system (see Photograph 3 in Figure 4.1-1). The office façade that fronts 23rd Street has minimal landscaping and a largely blank façade. South of the building, is the main vehicle entrance to the associated surface parking lot. Site 2D/E has a moderate level of visual quality but does not contain any significant or unique features relative to the surrounding urban use.

Site 2I

On the North Campus, Site 2I is currently developed with the Child & Family Development Center, which consists of a two-story commercial building with a flat roof. The building features characteristics of the Modern style (see Photograph 7 in Figure 4.1-2). The façade features a central entrance with concrete steps, a ramp, metal railings and double glass doors. The building is set back five feet from the lot line along 20th Street and is fronted with minimal vegetation consisting of low lying hedges, trees and planters. The rear of the building northeast elevation features a playground area for the classrooms, which is enclosed by a painted cinderblock fence lined with vegetation. As noted in Section 4.4. *Historic Resources*, the Child & Family Development Center is eligible as a historical resource and is an excellent example of a Mid-Century Modern style medical office building. The existing visual quality of Site 2I is moderate in consideration of the Child & Family Development Center building.

Site S4

Fronting Santa Monica Boulevard on the South Campus, within Site S4, is the two-story brick and concrete John Wayne Cancer Institute Building located at 2200 Santa Monica Boulevard (see Photograph 6 in Figure 4.1-2). Designed in a Mid-Century Modern style, the building features horizontal massing, geometric elements, large glazing, and a flat roof. The building is set back between 13 feet and 32 feet from Santa Monica Boulevard. Within the setback fronting the sidewalk is an inset-entrance and courtyard and large brick lined planters that contain flowers, low lying vegetation, and trees. As noted in Section 4.4. *Historic Resources,* the John Wayne Cancer Institute is eligible as a historical resource and is an excellent example of a mid-20th century medical facility. The existing visual quality of Site S4 is moderate in consideration of the John Wayne Cancer Institute. building

Site S3

On the South Campus, fronting Site S3 along Santa Monica Boulevard south of 21st Street, are two temporary MRI modular buildings that were constructed during PSJHC Phase I. Site S3 has relatively low visual quality as a portion of these buildings are set back from the street behind green metal fencing. The façades of the temporary buildings do not contain windows or architectural elements and various mechanical and utility equipment faces the street front. A surface parking lot is located to the west of the buildings set behind a low level concrete block fence.

Sites S1, S2, and S5

Located on the South Campus, Sites S1, S2, and S5 are currently uses as a surface parking by PSJHC. Views of Site S1's surface parking and associated vehicles are minimally screened by small trees and a small perimeter planter. The frontage of Sites S2 and S5 contain minimal landscaping and views of the surface parking lot and vehicles are set behind metal fencing. Sites S1, S2, and S5 have a relatively low visual quality.

Air Quality

The Project Site is located within the South Coast Air Basin (Air Basin), under the jurisdiction of the South Coast Air Quality Management District (SCAQMD), which provides guidance in reducing air quality emissions in the Air Quality Management Plans (AQMPs). The purpose of the AQMP is to maintain attainment with the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) and achieve attainment for those air pollutants currently in non-attainment with NAAQS and/or CAAQS.

The Air Basin is an area currently designated as a federal non-attainment area for ozone and fine particulate matter (PM2.5), as it does not currently meet the respective NAAQS. In addition, the Air Basin does not meet the CAAQS for ozone, respirable particulate matter (PM10), and PM2.5. Accordingly, the SCAQMD expects pollutant exposure reductions to be achieved through implementation of new and advanced control technologies as well as improvement of existing technologies. Construction of the Project is subject to a number of rules and regulations promulgated by the State and SCAQMD. For example, the California Air Resources Board (CARB) In-Use Off-Road Fleet Vehicle Regulation requires construction fleet operators to meet fleet wide emissions standards by retrofitting equipment with emissions control devices, or repowering or replacing equipment with cleaner engines. SCAQMD Rule 403 requires implementation of best available fugitive dust control measures during active construction periods capable of generating fugitive dust emissions from on-site earth-moving activities, construction/demolition activities, and construction equipment travel on paved and unpaved roads.

Noise and Vibration

The predominant existing noise source in the Project Site vicinity is vehicular traffic noise from roadways surrounding the Project Site. Secondary noise sources include activities related to the operation of commercial businesses in the area, including loading area/delivery truck activities, trash compaction, and refuse collection. In addition to noise, ground-borne vibration sources include light rail trains, heavy trucks and buses on rough roads, and the operation of heavy and high impact equipment during construction.

Existing daytime ambient noise levels were measured at the noise sensitive receptors nearest the Project site to establish baseline noise levels for the Project construction noise analysis. Daytime ambient noise levels ranged from 63.1 to 73.8 dBA Leq (See Table 4.13-1). Per Table 4.13-2 in Section 4.13, *Noise and Vibration*, of this EIR, a noise level of 63.1 is "compatible" with residential uses "with mitigation", while a noise level of 73.8 is "normally incompatible" with residential uses.

The noise levels attributed to existing traffic volumes on local roadways were estimated using a spreadsheet model developed based on the methodologies provided in Federal Highway

Administration's (FHWA) Traffic Noise Model (TNM) Technical Manual. Existing peak hour noise traffic noise levels at the closest noise sensitive receptors ranged from 48.7 to 72.5 dBA CNEL.

Transportation

Regional access to the Project Site is provided by the Santa Monica Freeway (I-10), Pacific Coast Highway, Lincoln Boulevard, and the San Diego Freeway (I-405). Local access is provided by Santa Monica Boulevard, Arizona Avenue, Broadway, 20th Street and 23rd Street, with Santa Monica Boulevard, Broadway, 20th Street and 23rd Street each bordering portions of the Project Site and Santa Monica Boulevard bisecting the Project Site and greater PSJHC Campus. The haul routes for the Project would travel south on Broadway to 20th Street, then on Colorado Avenue to Cloverfield Boulevard, and finally onto the I-10 Freeway. Six of the 79 study intersections within the Traffic Study Area currently operate at poor levels of service (LOS E or F), while seven of the 17 study street segments currently operate above their general carrying capacities.

4.3.3 Environmental Impacts

4.3.3.1 Thresholds of Significance

Construction effects is not an environmental issue category identified in CEQA or the State CEQA Guidelines. Significance thresholds for each of the environmental issues are discussed in the specific impact sections. Generally, the analysis addresses whether the composite impacts due to construction would be considerable. Significance criteria for resource areas that are relevant to construction effects are listed in Sections 4.1, *Aesthetics*, 4.2, *Air Quality*, 4.13 *Noise and Vibration*, and 4.17, *Transportation*. The following is used as the significance threshold by the City in this section:

Would construction of the project:

a) Result in considerable construction period impacts due to the scope or location of construction activities?

4.3.3.2 Methodology

The following impact analysis summarizes the potential construction effects of the Project. The major impacts associated with construction analyzed in this section include aesthetics, air quality, noise and vibration, and transportation. The air quality, noise and traffic analyses are based on project-specific modeling prepared for Project (included as Appendices B, J, and L, respectively, of this EIR). Applicable federal, state, and local regulations were also considered. The construction-specific methodologies and significance criteria for each of these environmental issues are discussed in their respective sections in this EIR.

4.3.3.3 Project Characteristics

The Project's construction would be implemented in up to five stages, which includes multiple sub-stages, with construction starting in the second quarter of 2021 and being completed in the fourth quarter of 2041, with occupancy and operation of the first Project building commencing in late 2022. Project construction activities would include site demolition, grading, excavation, and

building construction and finishing activities. The approximate number of on-site construction staffing is estimated to be 326 workers.

Project construction would require pavement demolition and grading that would generate approximately 15,975 cubic yards of demolition debris (asphalt and general construction debris) and require exportation of approximately 919,662 cubic yards of soil during grading and excavation activities. The improvements of the existing health center would include up to 682,700 new square feet of floor area (660,150 square feet above-grade and 22,550 square feet below grade floor area), 10 replacement multifamily housing units, and enhanced vehicular pedestrian circulation connections.

Two construction phasing plans are contemplated, Phasing Plan A and Phasing Plan B. Plan B would provide a similar type and intensity of construction of land uses as Plan A, but would be implemented with an alternative construction schedule that allows PSJHC to pursue development on Site 2C as the first stage of construction. Phasing Plans A and B were evaluated separately, where required (e.g., noise/vibration). Otherwise, the worst-case condition under the two phasing plans was evaluated (e.g., aesthetics, air quality, and traffic). Both phasing plans have been designed to achieve the following goals:

- Minimize construction impacts on neighboring residents and businesses by allowing for staging on PSJHC-owned properties to the extent possible.
- Maximize the amount of PSJHC-owned parking that is available during each stage of construction and ensuring PSJHC provides sufficient parking for its various users throughout implementation of the plan.
- Allow the existing Child & Family Development Center and the John Wayne Cancer Institute (both of which are being replaced under the Project) to remain in operation until their new facilities on the South Campus are completed.
- Ensure that the existing Phase I Keck and CSS Buildings on the North Campus remain fully operational and accessible through all stages of construction.
- Prioritize construction of the Multifamily Housing.
- Ensure sufficient time to raise the funds needed to build each of the Project buildings.

Construction activities would be carried out pursuant to: (1) project design feature PDF-AQ-1 and mitigation measure MM AIR-1 that establishes standards for the control of emissions from diesel-fueled equipment to minimize daily emissions; (2) mitigation measures MM NOISE-1 and MM-NOISE-2 that would reduce construction vibration impacts; and (3) PDF-TRAF-1 that requires implementation of a Construction Management Plan to limit construction traffic impacts and ensure adequate circulation and emergency access during construction.

4.3.3.4 Project Impacts

Impact CE-1: *Would construction of the project result in considerable construction period impacts due to the scope or location of construction activities?*

Impact Statement CE-1: Project construction activities would not substantially degrade the existing visual character or quality of the surroundings. Furthermore, Project construction activities would result in less than significant transportation impacts with implementation of the proposed PDF, and less than significant air quality and noise impacts with implementation of the proposed PDFs and mitigation measures. However, Project construction activities could result in significant construction-related vibration impacts at some adjacent vibration-sensitive medical uses not owned by Saint John's if they do not agree to participate in the vibration mitigation identified in this EIR. Therefore, significant unavoidable construction period vibration impacts could occur.

Aesthetics

Section 4.1, *Aesthetics*, provides an analysis of aesthetic effects due to Project construction. As indicated therein, Project construction activities would be primarily visible from Santa Monica Boulevard, 20th Street, 21st Street, 23rd Street, and Broadway, and to a more limited extent, along Arizona Avenue, 20th Street and 23rd Street. However, taller construction equipment such as cranes would be visible from a greater radius of street networks. Project construction activities would include demolition of existing structures, grading, excavation, and building construction and finishing activities. Construction activities would also include the staging of construction vehicles, the storage of materials. These activities would be phased and could be temporarily disruptive. Construction work is assumed to begin in the 2nd Quarter of 2021 with occupancy and operation of the first Project building commencing in late 2022, and completion of the entire construction program enduring the fourth quarter of 2041. These activities would result in site disturbance, movement of construction equipment, import and export of materials, views of incomplete buildings, and other activities that generally contrast with the aesthetic character of an area to varying degrees during this period.

However, aesthetic impacts during construction would be reduced through the use of construction fencing that would partially screen views of grading and other site disturbance from adjacent streets, sidewalks and adjacent land uses. Furthermore, construction activities would occur in the midst of an already fully developed site within an already fully developed area, would be partially blocked from view by intervening structures, and would be temporary. Lastly, in accordance with SB 743, the aesthetics impacts for qualifying projects such as the proposed Project (e.g., mixed-use projects on infill sites within transit priority areas) shall not be deemed significant impacts on the environment. Therefore, Project construction activities would not substantially degrade the existing visual character or quality of the site and its surroundings.

Air Quality

Section 4.2, Air Quality, provides analysis of air quality impacts during Project construction. As indicated therein, with compliance with applicable requirements (e.g., SCAQMD Rule 403 etc.), Project construction activities would not conflict with implementation of the Air Quality Management Plan (AQMP), relevant air quality-related policies of the City's General Plan, or other adopted regional and local plans adopted for reducing air quality impacts. Project construction activities would result in regional emissions above SCAQMD significance for nitrogen oxides (NO_X), localized emissions above SCAQMD significance thresholds for NOx and PM, and toxic air contaminants (TACs) above OEHHA guidance for carcinogenic exposure, before mitigation.

However, Project these impacts would be reduced to less than significant levels with compliance with applicable requirements (e.g., District Rule 403 for dust control, etc.), implementation of PDF-AQ-1 that establishes emissions standards for the operation of diesel-fueled equipment, and implementation of mitigation measure MM-AIR-1 (e.g., application of USEPA Tier 4 Final off-road emissions standards or equivalent for construction equipment, etc.,). Therefore, Project construction-related air quality impacts would be less than significant.

Noise and Vibration

Section 4.13, *Noise and Vibration*, provides analysis of noise and vibration impacts during Project construction. As indicated therein, Project construction activities would include demolition, grading, excavation, building construction and finishing, and paving, the use of heavy equipment, and haul trucks and construction worker traffic. These activities and traffic would cause noise and vibration at nearby sensitive receptors adjacent to and across from the Project Site, and along nearby roadways. With compliance with applicable City regulations (such as those limiting the times of day when construction activities are permitted), and with implementation of PDFs NOISE-1 (construction noise BMPs), construction noise impacts would be less than significant. With compliance with PDF NOISE-2 (site-specific vibration studies and implementation of vibration-minimization measures, as required), and with implementation of MM NOISE-1 (restrictions on the use of heavy vibration-generating construction equipment adjacent to vibration-sensitive uses), Project construction vibration impacts would be less than significant (except as discussed further below as applicable to sensitive medical uses).

Mitigation Measure NOISE-2 would prevent vibration impacts to vibration sensitive medical equipment at nearby Medical Office Buildings not owned/controlled by Saint John's that participate in Mitigation Measure NOISE-2 through location inventory, simulation testing, equipment relocation, equipment isolation, not conducting construction during active use of equipment, or alternative construction methods. Thus, potentially significant construction vibration impacts at participating Medical Office Buildings not owned/controlled by Saint John's would be reduced to a less than significant level. However, for any Medical Office Buildings not owned/controlled by Saint John's that do not participate in Mitigation Measure NOISE-2, project construction vibration could result impacts to vibration sensitive medical equipment/uses. Therefore, the impact is considered to be significant and unavoidable.

Transportation

Project construction worker vehicles, materials deliveries, demolition debris removal trips, and soil export trips are expected to add additional vehicles (trucks and automobiles) to area streets throughout the construction period. For the purposes of this EIR, it is assumed that construction would commence in the 2nd Quarter of 2021, with occupancy and operation of the first Phase II building commencing in late 2022, and completion of the entire construction program by the end of 2041. The stages of construction at the Project Site, and the maximum number of associated construction workers during each stage, is identified below.

Construction Stage	Estimated Number of Construction Workers
• Demolition	14
• Grading/Excavation	14
• Foundation/Concrete Pour	55
• Building Construction	180
• Paving	8
• Architectural Coatings	55

During the most intensive construction stages (e.g., earth moving and building construction of Building S4), Project construction activities would generate a maximum of an estimated 310 in-bound and 310 out-bound construction trips per day (e.g., construction worker, vendor, and construction haul trips), including a maximum of 185 in-bound and 185 out-bound construction truck haul trips. This maximum number of construction trips, which would be temporary and occur over the course of several months as opposed to during other construction phases and during construction of the other proposed buildings through buildout in 2041 where construction traffic would be much less, would represent a small temporary incremental increase in traffic in the Project vicinity. Furthermore: (1) a Construction Traffic Management Plan (e.g., PDF-TRAF-1) would be implemented to minimize construction traffic impacts on the surrounding street network (such as limiting construction work within public ROWs to off-peak hours, prohibiting construction truck queuing/staging on City streets, and limiting construction trucks to a City-approved construction haul route); (2) construction workers typically arrive and depart individual construction sites during off-peak hours, thereby avoiding a large proportion of the construction related trips during the AM and PM peak traffic periods; and (3) construction haul truck trips typically occur over the course of a day thereby reducing their hourly effects.

As indicated above, Project construction activities would include the temporary generation of construction truck traffic. Because this truck traffic would be required to adhere to a City-specified construction haul route, which in part would be selected to avoid residential areas, and because the Project Site located in a commercial rather than a residential area, the Project would not result in substantial construction truck traffic through a residential area.

Project construction activities could include lane closures and/or construction activities within street ROWs that could potentially interfere with traffic flow or result unsafe conditions. However, any lane closures and/or in-ROW construction activities would be temporary. Furthermore, the proposed Construction Management Plan (e.g., PDF-TRAF-1) includes multiple provisions addressing these issues, including: (1) implementation of a City-approved detailed work zone plan for temporary lane, sidewalk, and bicycle lane closures (e.g., flagmen, directional signage, etc.); (2) limiting construction work in public ROWSs to off-peak hours; (3) prohibiting construction truck queuing/staging on City streets; (4) limiting trucks to a City-approved construction haul route; and (5) limiting construction staging to PSJMC-owned properties to the extent possible.

Lastly, the proposed Construction Management Plan would ensure continued emergency access to the Project Site and adjacent properties during the construction period. Hence, Project construction activities would not substantially interfere with emergency access.

Based on the above, Project construction traffic impact would be less than significant.

4.3.3.5 Cumulative Impacts

A project's construction activities can result in cumulative construction impacts when construction from other development is located in the immediate vicinity of the proposed site and/or along the same roadways that are used by construction workers and vehicles. As indicated in Table 3-1 in Chapter 3, *General Description of Environmental Setting*, of this EIR, 131 cumulative projects are located in the City and its environs. As indicated in Figure 3-1 in Chapter 3 of this EIR, two of these cumulative projects are located within one-half block of the Project Site, including Cumulative Project No. 34 at 2225 Broadway (approved residential with groundfloor commercial) adjacent to Site S2 and Cumulative Project No. 35 at 1450 Cloverfield (approved residential with groundfloor commercial) one-half block east of Site S2. As further indicated therein, four additional cumulative projects are located within two blocks of the Project Site, including Cumulative Project Nos. 18 at 1434 14th Street (residential under construction), 27 at 1347 19th Street (mixed-use artist studio and office under construction), 81 at 1419 19th Street (pending medical office) and 112 at 1242 20th Street (pending wellness center).

Of the cumulative projects, only Cumulative Project Nos. 34, 35 and 112 are in direct line-of-site of portions of the Project Site and thus have the potential to add to the aesthetics impact of the Project. However, like the Project, these and the other cumulative projects would be required to have construction fencing around their respective construction sites that would minimize views of the construction sites from adjacent properties. Furthermore, the Project's construction-related aesthetics impacts, including those related to scenic vistas, visual character, visual character, light/glare, and shade/shadow, would not be substantial. Lastly, per Section 21099(d)(1) of the Public Resources Code (PRC), the Project is an urban infill project within a transit priority area and as such its aesthetic impacts, including its contribution to cumulative aesthetics impacts, shall not be deemed significant impacts on the environment.

With respect to cumulative construction air quality and noise/vibration impacts, air emissions, noise and vibration attenuate rapidly with distance. Furthermore, all but Cumulative Project Nos. 34, 35 and 112, are blocked from direct line-of-site by adjacent office-site development by intervening buildings that would block much of the construction noise coming from the construction sites of the Project and the cumulative projects. Furthermore, the construction activities of the proposed Project and each of the cumulative projects would be required to comply with SCAQMD Rule 403, City restrictions on the times of day when construction activities can occur, and other applicable requirements which have been formulated to minimize construction-related air emissions and noise/vibration, and construction-related air and noise/vibration impacts would be temporary. Lastly, the Project's construction air quality and noise impacts, and operational vibration impacts, would be less than significant after mitigation. Therefore, cumulative air quality and noise/vibration impacts would be less than significant, and the Project would not contribute considerably to these impacts.

The greatest potential for cumulative impacts would be from Project construction traffic and multiple cumulative projects occurring along common haul routes. As previously noted, there are two cumulative projects (e.g., Cumulative Project Nos. 34 and 35) within one-half block of the Project Site and several within cumulative projects within two blocks of the Project Site. However, if the construction activities of the Project were to overlap with those of the cumulative projects, any associated lane closures, detours, or changes to ingress/egress, bicycle and pedestrian circulation, or emergency access would be coordinated as required by the Project's Construction Traffic Management Plan (PDF TRAF-1). In addition: (1) any of the cumulative projects that might share the Project's construction haul route would be limited, and the City's established process would take into consideration overlapping construction projects and would balance haul routes to minimize the impacts of cumulative hauling on any particular roadway; (2) cumulative construction traffic impacts would be temporary; and (3) as indicated in the Section 4.17, Project construction traffic impacts would be less than significant with implementation of PDF-TRAF-1. For all these reasons, the Project cumulative construction-related transportation impacts would be less than significant, and the Project's contribution to these impacts would not be cumulatively considerable.

4.3.4 Mitigation Measures

No construction mitigation is required for aesthetics. No construction mitigation is required beyond that identified in Sections 4.2, *Air Quality*, 4.13 *Noise and Vibration*, and 4.17, *Transportation*, of this EIR for air quality, noise/vibration, and transportation.

4.3.5 Level of Significance After Mitigation

No construction mitigation is required for aesthetics. With the implementation of the construction mitigation identified in Sections 4.2, *Air Quality*, 4.13, *Noise and Vibration*, and 4.17, *Transportation*, of this EIR, construction impacts in terms of these issues would be less than significant, except for construction vibration on certain types of vibration-sensitive medical uses (see vibration discussion above) which would be significant and unavoidable.

4.4 Cultural Resources – Historical Resources

4.4.1 Introduction

This section evaluates potential Project impacts on historical resources and is based on the Cultural Resources Technical Report (Technical Report) included as Appendix C of this EIR.

4.4.2 Environmental Setting

4.4.2.1 Existing Conditions

The Phase II Development Sites are located on the PSJHC Campus, which is located within the City's Healthcare Mixed Use District in an area generally bounded by Arizona Avenue to the north, Broadway to the south, 20th Street to the west, and 23rd Street to the east. The PSJHC Campus is located on both the north and south sides of Santa Monica Boulevard. The Phase II Development Sites include 2C, 2I, 2D/E, Mullin Plaza Site, S1, S3, S2, S4, and S5. Existing land uses on these sites consist of surface parking lots and landscaping, and one- and two-story buildings associated with PSJHC.

Site 2C

Site 2C is currently developed with a surface parking lot (the West Lot) containing capacity for 90 vehicles.

Site 2D/E and Mullin Plaza

Site 2D/E is developed with the Saint John's Health Center Foundation Building, a two-story concrete office building of 10,800 square feet located at 2221 Santa Monica Boulevard with surface parking (24 spaces) that serves the office building. The Foundation Building was built in 1970. South of the building, is the main vehicle entrance to the associated surface parking lot.

The Mullin Plaza site is currently developed with open space, landscaped areas, and driveways as the main vehicular access to the PSJHC from Santa Monica Boulevard.

Site 2I

Site 2I is developed with the Child & Family Development Center (CFDC) (1339 20th Street) which consists of a two-story building with a basement and a one-story pool house. The CFDC is designed in the Mid-Century Modern style and features horizontal massing, large glazing at the entrance, a flat roof and a smooth brick finish with alternating sun shades above the fenestration. It consists of two long rectangular wings that parallel 20th Street and are connected by two short hyphens, which appear to look like a modified H. Between the two wings and hyphens is a centrally located enclosed courtyard. The courtyard features brick pavement, a memorial bench, flowers, hedges, and trees. The CFDC was constructed in 1961 and opened in 1962.

Sites S1 & S3

Sites S1 and S3 are currently improved with surface parking lots containing capacity for 139 (Lot B) and 145 (Lot I) vehicles, respectively, and two temporary MRI modular buildings that were placed on the Sites in 1999 and 2003.

Site S2

Site S2 is developed with a portion of a surface parking lot (Lot H) that is used by PSJHC.

Site S4

Site S4 is developed with the existing two-story John Wayne Cancer Institute Building (JWCI) (2200 Santa Monica Boulevard, which was originally known as the Medical Arts Building). The JWCI is designed in the Mid-Century Modern style and features horizontal massing, geometric elements, large glazing, and a flat roof. It was built in three phases and has a U-shaped plan with a longer northwest wing. The entire building is two-stories, except a small portion of the northeast wing, which is one-story. The fenestration on a majority of the building consists of horizontal sliding aluminum-sash windows or fixed aluminum-sash windows on the northeast elevation. The other three elevations feature metal-sash windows, organized with paired casement windows over a hopper window. The JWCI was built in 1950.

Site S4 is also developed with an existing vacant ten-unit multifamily apartment building (Courtyard Apartment) (1417-1423 21st Street), and a paved surface parking lot that is used by PSJHC. The Courtyard Apartment has a U-shaped plan arranged around a central landscaped courtyard. The Courtyard Apartment was designed in the Minimal Traditional style with American Colonial Revival style architectural details popular among builders and developers during the 1930s, 1940s, and 1950s. As it relates to the Courtyard Apartment, the architectural features characteristic of the American Colonial Revival style represented in the southwest façade include their form and massing; hipped roofs; belt-course, and porch configurations (broken pediments, porticos, fluted pilasters). The Courtyard Apartment is set back from the street and fronted by a lawn. A single walkway runs through the central courtyard has a prominent conifer tree in the middle, lawn hedges, and shrubs. The Courtyard Apartment was constructed in 1947.

Site S5

Site S5 is developed with a surface parking (a portion of Lot H) that is used by PSJHC.

4.4.2.2 Historic Background

The following historic context summarizes the history of the Project Site and development of the surrounding area. A more detailed discussion of the history, historic themes, property types, architectural styles, and architects can be found in the Cultural Resources Technical Report completed for the Project (Appendix C).

According to the 1918 Sanborn Fire Insurance Map of Santa Monica, the Orchard and Golden State Tracts were largely unimproved until the post-World War I era. The Mid-City Neighborhood included some of the earliest twentieth century residential development in the City. This area experienced a boom during World War I and the Great Depression. The 1950 Sanborn map illustrates the increase in building density after World War II. Saint John's Hospital (precursor to PSJHC), constructed in 1942, occupied block 128; the Courtyard Apartment, constructed in 1947, occupied a parcel on block 153 where part of a nursery once stood; and the JWCI (formerly known as the Medical Arts Building), constructed in 1950, would eventually occupy four parcels on block 153; and the CFDC, constructed in 1961, would occupy a vacant part of block 129. By 1950, very few parcels in the area were undeveloped.

Saint John's Hospital was opened in November 1942 by the Sisters of Charity of Leavenworth. The hospital was designed by I.E. Loveless and constructed by Pozzo Construction Company for $800,000. As the population of Santa Monica grew, the demand for healthcare facilities also increased, and in June 1949 construction began on a new seven story $2,3000,000 North Wing addition. The hospital served the growing community during the 1950s population boom and also responded to the rapid advancements in healthcare in the years that followed. Over the course of 45 years, the hospital grew with the addition of three wings and an ambulatory care facility by the 1970s. As the hospital expanded, it absorbed the surrounding residential properties. In 1994, the North Wing addition was severely damaged by the Northridge Earthquake. It was demolished and reconstructed in 1997. The original hospital building was demolished in the early 2000s and redeveloped by 2010.

While hospitals were being constructed in Santa Monica, the construction of medical office buildings boomed during the 1940s and 1950s. The number of medical office buildings constructed outnumbered the construction of hospitals. Medical office buildings were cost effective to build and often constructed adjacent to hospitals and commercial districts. They were generally designed in the latest architectural style with modern medical technology and automobile convenience. The Santa Monica Doctors Building at 2125 Arizona Avenue (1950-1952) and JWCI (formerly known as the Medical Arts Building) (1950) were built near the PSJHC in the 1950s. Another growth spurt of medical facilities happened in the 1960s when two more modern medical buildings were built near PSJHC in 1961: Santa Monica Convalarium at 1320 20th Street and CFDC at 1339 20th Street.

JWCI

The JWCI building (formerly known as the Medical Arts Building) was constructed in 1950 at a cost of $750,000 and was designed by Weldon J. Fulton of Santa Monica. The designed intention was for the building to expand and additions to be built in phases as demand for medical facilities and offices grew in the post-war years. After the completion of the first phase of the building, another wing was added in 1952. The 15,000-square-foot two-story addition was once again designed by Weldon J. Fulton. The architect stated that the addition's interior would include doors and woodwork in natural mahogany finish, corridors would have cork floors, acoustical tile ceilings, with mahogany wainscoting. The exterior would include aluminum projecting and sliding sash windows; concrete, stucco, and brick planting boxes surrounding the building. In addition, the construction of a basement area provided for "storage, heating ventilating and incinerator rooms." A final addition designed again by Weldon J. Fulton was added to the northeast corner of the southeast elevation in 1966. The building provided office and business space for a variety of medical doctors and businesses until 1991 when the JWCI moved from UCLA to its current location on Santa Monica Boulevard.

CFDC

In 1959, the Sisters of Charity of Leavenworth received a loan of $70,000 from Archbishop Cantwell to purchase the Ramsey Military School located at 1315 20th Street, which was adjacent to PSJHC. That same year seed funding for the construction from Ethel Kennedy and the Kennedy Foundation was received for the "Lt. Joseph P. Kennedy Memorial Child Care Center" (present-day CFDC), named in memory for Lt. Joseph P. Kennedy, son of Senator Joseph P. Kennedy, Sr.

who died in World War II. Seattle-based architect John W. Maloney was chosen to design the new medical facility. Prior to the development of child study centers, many developmentally disabled children were either abandoned and orphaned, or isolated from other family members, due in part to family shame. However, in the 1950s the Kennedy family made developmentally disabled children one of their primary causes, due in large part to Senator Kennedy's daughter's condition; Rose Marie (Rosemary) experienced mental and behavioral disabilities and was later institutionalized after a prefrontal lobotomy left her permanently incapacitated.

With the development of the Kennedy Family's Joseph P. Kennedy Jr. Foundation, Senator Joseph P. Kennedy put his daughter Eunice in charge of awarding appropriate recipients. Eunice, on behalf of the family's foundation, assisted many organizations that aided developmentally disabled children. However, according to a *Saturday Evening Post* article in 1962, the Kennedy Foundation said it became apparent in 1956, that no matter how much they donated to these other facilities, "fundamental problems of the field were still there…so we decided to concentrate on research to meet the problem at its source." And with this new approach, the first Kennedy Children's Center was established in New York in 1958, and soon after a west coast location, Santa Monica, was identified a year later. On March 19, 1962, the *Los Angeles Times* reported that Cardinal McIntyre blessed the "new $914,000 Kennedy Child Study Center." The article also reported that the facility would provide out-patient services for mentally and emotionally challenged children. The dedication ceremonies were attended by over 100 people, including President Kennedy's sisters Mrs. R. Sargent Shriver Jr. and Mrs. Pat Lawford, who was accompanied by her actor-husband, Peter Lawford.

The classrooms within the CFDC were state-of-the art, and allowed for the observation of children without the child's knowledge. Each classroom was fixed with a one-way mirror, which allowed for behavioral studies of children. Shortly after the opening, the *Los Angeles Times* reported that The Hope Guild Clinic would join the CFDC in their new building.

Concurrently, when the CFDC opened, Eunice urged her brother, President John F. Kennedy, to make this topic one of his priorities in the new administration. As such, John F. Kennedy created the "President's Panel on Mental Retardation," which created a blueprint to address those living with developmental disabilities. A year later, John F. Kennedy signed the Maternal and Child Health and Mental Retardation Planning Amendment to the Social Security Act, the first major legislation to combat mental illness.

As national awareness grew on this topic, so did Saint John's Community Mental Health Center and overall psychiatric services under the direction of Dr. Evis Coda. By 1967, California adopted the Laterman-Petris-Short Act, which limited forced hospitalization and involuntary medication of patients, and in turn the deinstitutionalization of developmentally disabled persons. Under Dr. Coda's direction, the CFDC provided a variety of services for psychiatric, psychological, educational, and parenting services for more than 20,000 families. Dr. Coda, also garnished attention within the field giving talks throughout Southern California to families about the changing field and studies. Within a few short years, the CFDC was recognized for its various achievements in the study of child development, including in 1968 when Dr. Coda was invited to the White House by President Lyndon Johnson to witness the signing of the "Mental Health and Mental Retardation

Construction and Facilities Act." The CFDC went on to garner further recognition when then Governor Ronald Reagan designated the CFDC as a regional center for the developmentally disabled, one of the state's first centers. At this time, Reagan promised $500,000 annually from the state to finance the CFDC's activities, while $250,000 would come from Saint John's. The CFDC has been nationally recognized for its influence of the study of developmentally disabled children since it opened in February 1962.

4.4.2.3 Historical Resources Identified Within and in the Vicinity of the Project

Historical Resources within the Project Site

As a result of historic architectural resources research and survey, three buildings on the Phase II Development Sites (Courtyard Apartment, JWCI, and CFDC) were identified as meeting the California Office of Historic Preservation's (OHP's) 45-year-old age threshold for consideration as historical resources (OHP, 1995). These resources were evaluated for listing in the National Register of Historic Places (National Register), California Register of Historical Resources (California Register), and City Landmark and Structure of Merit Criteria to determine if they meet the definition of historical resources in CEQA Guidelines Section 15064.5(a).

Courtyard Apartment

The Courtyard Apartment (1417-1423 21st Street; APN: 4275-007-003) is a 10-unit apartment building designed in the Minimal Traditional style with American Colonial Revival style architectural details constructed in 1947. This building is not identified in the City's 2017 Historic Resources Inventory (HRI). As further discussed in the Cultural Resources Technical Report, the Courtyard Apartment was found ineligible for listing in the National Register and California Register under Criteria A/1-D/4, City Landmark Criteria 1 through 6, and Structure of Merit Criteria 1, 2, and 3. It was also not identified as a contributor to a historic district. Therefore, the Courtyard Apartment does not meet the definition of historical resources in CEQA Guidelines Section 15064.5(a).

JWCI

The JWCI (2200 Santa Monica Boulevard; APN: 4275-007-011) is a Mid-Century Modern style medical facility constructed in 1950, with additions in 1952 and 1966, all of which were designed by architect Weldon J. Fulton. As further discussed in the Cultural Resources Technical Report, the JWCI appears eligible for listing in the National Register under Criteria A and C at the local level, and B at the national level; California Register under Criteria 1, 2, and 3; and City Landmark Criteria 1, 3, 4, and 5. The JWCI appears eligible for its associations with post-World War II medical facilities constructed in the Mid-City neighborhood, that began an important trend of the development of world-class medical facilities in Santa Monica (Criterion A/1), and as both an example of work by master architect Weldon J. Fulton and as excellent example of a mid-20th century Modern style medical facility building type (Criterion C/3). The period of significance was identified as 1950 to 1966, which encompasses its dates of construction (1950-1966). The JWCI retains all seven aspects of integrity (location, design, setting, materials, workmanship, feeling, and association). Therefore, the JWCI meets the definition of historical resources in CEQA Guidelines Section 15064.5(a).

CFDC

The CFDC (1339 20th Street; APN:4276-027-018) is a Mid-Century Modern style building constructed in 1961. As further discussed in the Cultural Resources Technical Report, the CFDC appears eligible for listing in the National Register under Criteria A, B, and C at the national level, and the California Register under Criteria 1, 2, and 3, for its associations with the history and development of the treatment of the mentally disabled as one of the earliest and most innovative developmental child study centers within the Nation and for its significant contributions in the treatment of the developmentally disabled (Criterion A/1), the productive life of Dr. Evis Coda (Criterion B/2), and as an example of work by master architect John W. Maloney and excellent example of a Mid-Century Modern style medical office building (Criterion C/3). The CFDC was also recommended eligible under City Landmark Criteria 1, 3, 4, and 5, and Structure of Merit Criterion 1. The period of significance was identified as 1961 to 1970, which encompasses its original date of construction (1961) and its period as a nationally recognized child study center (1962-1970). The CFDC retains all seven aspects of integrity (location, design, setting, materials, workmanship, feeling, and association). Therefore, the CFDC meets the definition of historical resources in CEQA Guidelines Section 15064.5(a).

Historical Resources within the Vicinity of the Project Site

Archival research identified 13 previously surveyed historical resources within a 0.25-mile radius of the Project Site. Of these 13 resources, only four would have direct or indirect views of the Project Site (**Table 4.4-1**). The Streamline Modern style Santa Monica Doctors Office at 2125 Arizona Avenue and a vernacular corner commercial building at 2301 Santa Monica Boulevard would have direct views. The Tudor Revival style former Kingsley Gates Mortuary at 1925 Arizona Avenue and the Spanish Colonial style McKinley Grammar School at 2401 Santa Monica Boulevard would have indirect views. All four of these buildings are identified in the City's Historic Resources Inventory at the local level and meet the definition of historical resources in CEQA Guidelines Section 15064.5(a).

TABLE 4.4-1
HISTORICAL RESOURCES WITH DIRECT OR INDIRECT VIEWS OF THE PROJECT SITE

Address	Building Name / P# (if applicable)	Description	View	Eligibility Status
2401 Santa Monica Boulevard	McKinley Grammar School / P-19-188709	Historic architectural resource: 1922/1935, Spanish Colonial Style, Education Property	Indirect	5D1
1925 Arizona Avenue	Kingsley Gates Mortuary	1933, Tudor Revival style Mortuary	Indirect	5S1
2125 Arizona Avenue	Santa Monica Doctors Office	1950-1952 Streamline Modern Medical Office (Structural Engineer: A. Irvin, Builder: I.E. Loveless)	Direct	5S1 Local landmark
2301 Santa Monica Boulevard	None	1923 Vernacular Corner Commercial Building	Direct	5S3

5D1: Contributor to a district that is listed or designated locally

5S1: Individual property that is listed or designated locally.

5S3: Appears to be individually eligible for local listing or designation through survey evaluation

SOURCE: ESA, 2018.

One potentially eligible historic architectural resource was identified adjacent to the Project Site, the New Medical Arts Annex building at 2208/2210 Santa Monica Boulevard, which was designed in a similar Mid-century Modern style by the same architect as the JWCI, Weldon J. Fulton, and completed in 1955, during the same time period as the JWCI (1950-1966). Because it was designed by the same architect and is similar in style, the New Medical Arts Annex is considered a potentially eligible historical resource under CEQA Guidelines Section 15064.5(a).

4.4.3 Regulatory Framework

4.4.3.1 Federal

National Register of Historic Places

The National Register was established by the NHPA of 1966, as "an authoritative guide to be used by federal, State, and local governments, private groups and citizens to identify the Nation's historic resources and to indicate what properties should be considered for protection from destruction or impairment" (36 CFR 60.2) (National Park Service, 1995). The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. As noted above, a resource that is listed in or eligible for listing in the National Register is considered "historic property" under Section 106 of the NHPA.

To be eligible for listing in the National Register, a property must be significant in American history, architecture, archaeology, engineering, or culture. Properties of potential significance must meet one or more of the following four established criteria:

A. Are associated with events that have made a significant contribution to the broad patterns of our history;

B. Are associated with the lives of persons significant in our past;

C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Have yielded, or may be likely to yield, information important in prehistory or history.

Historic districts will possess a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. Historic districts derive their importance from being unified entities, even though they are often composed of a wide variety of resources. A district's identity results from the interrelationship of its resources, which can convey a visual sense of the overall historic environment or be an arrangement of historically or functionally related properties. Districts must also meet one of the four National Register criteria (A-D), and will typically be eligible under Criterion C as significant and distinguishable entities whose components may lack individual distinction plus Criterion A, Criterion B, other parts of Criterion C, and/or Criterion D. A district can include features that lack individual distinction and individually distinctive features that serve as focal points. Even if all of

the components lack individual distinction, the district may still be eligible provided that the grouping achieves significance as a whole within its historic context (National Park Service, 1995).

In addition to meeting one or more of the criteria of significance, a property must have integrity. Integrity is defined as "the ability of a property to convey its significance" (National Park Service, 1995). The National Register recognizes seven qualities that, in various combinations, define integrity: location, design, setting, materials, workmanship, feeling, and association.

For historic districts, the majority of the components that add to the district's historic character must possess integrity, as must the district as a whole. In addition, the district can contain non-contributing properties provided they do not detract from the overall integrity (National Park Service, 1995).

4.4.3.2 State

California Register of Historical Resources

The California Register is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). The criteria for eligibility for the California Register are based upon National Register criteria (PRC Section 5024.1[b]). Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

4.4.3.3 Local – City of Santa Monica

The City of Santa Monica formally initiated a historic preservation program with its 1976 adoption of the Landmark and Historic Preservation Ordinance. Santa Monica Landmarks and Historic Districts Ordinance was amended in 1987 and again in 1991 to create a more comprehensive

preservation program. This ordinance established the Landmarks Commission, whose powers include designation of City Landmarks and Structures of Merit s, and providing recommendations to the City Council for the designation of historic districts. Furthermore, the ordinance identified the obligations required of historic property ownership and a broad range of incentives available to owners of historic properties.

In 2002, the City adopted the Historic Preservation Element of the General Plan. This element includes information about the history and historical development of Santa Monica, establishes a long-range vision for the protection of historic resources in the City, and provides implementation strategies to achieve that vision. In 2010, the City adopted the updated General Plan Land Use and Circulation Element (LUCE), which includes a chapter on Historic Preservation (Chapter 2.3). The LUCE supplements the City's existing Historic Preservation Element by actively integrating the preservation of historic resources into planning efforts throughout the City. Chapter 2.3 of the LUCE includes policies to ensure that the City continues to protect what is unique and valued on citywide and neighborhood levels, including Palisades Park and the bluffs; Santa Monica Pier; and neighborhood streetscapes, architecture, and building scale.

The City first initiated a comprehensive historic resources survey and inventory of historically and architecturally significant properties within the City's boundaries in 1983 to support the first historic preservation element of the City's General Plan. Phase I of the inventory identified 2,775 resources of potential significance and formally documented 555 resources, which were mostly located in a strip along City's western boundary. Phase II was conducted in 1985-86 and documented the sections of the City north of Montana Avenue that had not been previously inventoried. An additional 162 inventory forms were prepared. Phase III was conducted in 1993-94 and encompassed the remaining 75 percent of the City. Inventory updates were conducted in 1994, 1997, 2002, 2004, and 2006. In 2008, the City updated its HRI and publically released the results in 2011. As a result of the inventories, approximately 1,600 individual properties and 53 historic districts were included in the City's HRI. In 2016, the City initiated development of a Citywide Historic Context Statement, building upon previous context statements, as well an update its HRI to identify all properties built through 1977. The HRI update was completed and released online in 2018. Aa a result, 855 individual properties, 20 historic districts, and 12 non-building resources are currently on the City's HRI.

Individual Landmarks

Section 9.56.100 of the City of Santa Monica Landmark and Historic Preservation Ordinance authorizes the Landmarks Commission to designate Landmarks or Historic Districts. An individually significant property may be designated a Landmark and such designations may be made provided that the subject properties meet one or more of the following criteria:

1. It exemplifies, symbolizes, or manifests elements of the cultural, social, economic, political or architectural history of the City.
2. It has aesthetic or artistic interest or value, or other noteworthy interest or value.
3. It is identified with historic personages or with important events in local, state or national history.

4. It embodies distinguishing architectural characteristics valuable to study of a period, style, method of construction, or the use of indigenous materials or craftsmanship, or is a unique or rare example of an architectural design, detail or historical type valuable to such a study.
5. It is a significant or a representative example of the work or product of a notable builder, designer or architect.
6. It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community or the City.

Historic Districts

A historic district is defined by the City of Santa Monica as "any geographic area or noncontiguous grouping of thematically related properties that the City Council has designated as and determined to be appropriate for historical preservation pursuant to the provisions of this [ordinance]." In order to be designated a historic district, an area must meet one of the following criteria, outlined in the Santa Monica Municipal Code [§9.56.100(b)]:

1. Any of the criteria for a Landmark designation
2. It is a noncontiguous grouping of thematically related properties or a definable area possessing a concentration of historic, scenic or thematic sites, which contribute to each other and are unified aesthetically by plan, physical development or architectural quality.
3. It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning.
4. It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community or the City.

Structures of Merit

Section 9.56.080 of the City of Santa Monica Landmark and Historic Preservation Ordinance recognizes the significance of Structures of Merit. A building, structure or object may be designated as a Structure of Merit if it meets the following criteria at the discretion of the Landmarks Commission or City Council, on appeal.

A. Identified in the City's Historic Resources Inventory.
B. 50 years of age and meets one of the following criteria:
    1. A unique or rare example of an architectural design, detail or historical type.
    2. Representative of a style in the City that is no longer prevalent.
    3. Contributes to a potential Historic District. (Prior code § 9607; added by Ord. No.2486, sections 1, 2, adopted 6/23/15)

Section 9.56.080 of the Ordinance recognizes the significance of Structures of Merit and empowers the City Landmarks Commission to designate such structures.

4.4.4 Environmental Impacts

4.4.4.1 Thresholds of Significance

Appendix G of the State CEQA Guidelines provides a set of questions that address impacts with regard to cultural resources. The following question is relevant to historical resources and is used as the significance threshold by the City in this section:

Would the project:

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

The thresholds for determining the significance of environmental effects on historical resources are derived from the State CEQA Guidelines as defined in Section 15064.5. According to the *State CEQA Guidelines* Section 15064.5(b), a project involves a "substantial adverse change" in the significance of the resource when one or more of the following occurs:

(1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

(2) The significance of a historical resource is materially impaired when a project:

   (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register of Historical Resources; or

   (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of Section 5024(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

   (C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Under CEQA, a proposed development must be evaluated to determine how it may impact the potential eligibility of a structure(s) or a site for designation as a historic resource.

Accordingly, a project would have a significant impact on historical resources if:

- The project would materially impair the eligibility of a building, structure or site as a historic resource such that it would no longer be eligible for inclusion in the California Register or local register.

4.4.4.2 Methodology

Under CEQA, the evaluation of impacts to historical resources consists of a two-part inquiry: (1) a determination of whether the Project Site or immediate vicinity contains historical resources, and

if so; (2) a determination of whether the project will result in a "substantial adverse change" in the significance of the identified resources. The following sources and tasks were reviewed and/or performed during preparation of the Technical Report:

- California State University, Fullerton California Historical Resources Information System – South Central Coastal Information Center (CHRIS-SCCIC) cultural resources record search. The CHRIS-SCCIC was conducted on March 20, 2017 and was reviewed for previous survey records and reports on file within a 0.25-mile radius of the Project Site. The records search includes resources that may have views of the Project Site and thus, could be susceptible to indirect impacts associated with the Project. A review of the National Register, California Register, California State Historic Resources Inventory (HRI), and City Historic Resources Inventory was completed to identify historical resources within a 0.25-mile radius of the Project Site. A 0.25-mile radius was determined to be appropriate for analyzing indirect visual and vibrational impacts since the Project Site is located within a dense, urban setting where resources in the vicinity would have limited views of the Project Site and since the new construction would have a maximum height of 105 feet, whereas the tallest buildings within the vicinity are currently 168 feet, and also since damage to historic buildings is typically caused by construction activities fewer than 50 feet from the building.
- Conducted a field inspection and pedestrian survey of the Project Site and vicinity on April 10, 2017. Existing on-site buildings and structures, as well as the immediate surroundings, were photographed. In addition, a windshield survey of the surrounding Project Site was conducted in order to assess the potential for a historic district and to assist in the assessment of indirect impacts.
- Conducted site-specific research onsite properties utilizing building permits, historic maps, aerial photographs, Sanborn Fire Insurance Maps (Sanborn Maps), City directories, United States (US) Census records, photo collections of the Los Angeles Public Library and Santa Monica Public Libraries, Calisphere, University of Southern California Digital Collections, University of California Santa Barbara Library, and Santa Monica History Museum, and historical society archives. In addition, research was also conducted at the Santa Monica Public Library and Santa Monica History Museum.

4.4.4.3 Project Characteristics

The Project proposes to expand health care and related facilities on the PSJHC over a period of over 20 years, with up to approximately 682,700 new square feet of floor area (660,150 square feet above-grade and 22,550 square feet below grade floor area), 10 replacement multifamily housing units, and enhanced vehicular and pedestrian circulation connections. As part of the Project, some existing buildings, structures, and parking lots would be demolished to make way for new construction. The Project includes the construction of both above-ground and below-ground facilities. The maximum height of new construction would be 105 feet. Chapter 2, Project Description, provides additional detail regarding the Project.

4.4.4.4 Project Impacts

As described above, two historical resources (JWCI and CFDC) were identified within the Project Site. Additionally, there are four off-site historical resources in the Project vicinity that would have direct or indirect views of the Project Site (Santa Monica Doctors Office at 2125 Arizona Avenue, a corner commercial building at 2301 Santa Monica Boulevard, Kingsley Gates Mortuary at 1925

Arizona Avenue, and McKinley Grammar School at 2401 Santa Monica Boulevard). There is one potentially eligible historical resource immediately adjacent to the Project Site (Site S4), the New Medical Arts Annex building at 2208/2210 Santa Monica Boulevard.

Historic Resources

Impact HIST-1: *Would the Project cause a substantial adverse change in the significance of a historical resources as defined in Section 15064.5?*

Impact Statement HIST-1: The Project would cause a substantial adverse change in the significance of historical resources as defined in Section 15064.5 due to demolition of the JWCI and the CFDC. Therefore, even with implementation of mitigation measures, impacts to these historical resources would remain significant and unavoidable.

Historical Resources within the Project Site

Significant direct impacts to the JWCI and CFDC would result from the proposed demolition of these two resources. The Project would demolish JWCI, located on Site S4, to make way for construction of the Education & Conference Center and East Ambulatory Care and Research Building. The Project would also demolish the CFDC, located on Site 2I, to make way for the 20th Street Medical Building. As a result, they would no longer convey their historical significance, and would no longer be eligible for national, state, or local listing. Therefore, the Project would have a significant impact on historical resources due to demolition of the JWCI and CFDC. Even after implementation of mitigation measures (MM HIST-1 and 2), impacts to historical resources would remain significant and unavoidable since there is no feasible mitigation to reduce the effects of demolition of the JWCI and CFDC to a less than significant level.

Indirect Impacts - Historical Resources in the Vicinity of the Project Site

Four historical resources are in the immediate proximity of the Project Site: the Streamline Modern style Santa Monica Doctors Office at 2125 Arizona Avenue; a vernacular corner commercial building at 2301 Santa Monica Boulevard; the Tudor Revival style former Kingsley Gates Mortuary at 1925 Arizona Avenue; and the Spanish Colonial style McKinley Grammar School at 2401 Santa Monica Boulevard. However, the Project would not alter the surrounding setting of any of these resources. While they have views of the Project Site, these resources are not adjacent to the Project Site. The Project would not result in any new construction adjacent to or in close proximity of any of these resources, and no indirect impacts from proximate development would occur as a result of the Project. Furthermore, these resources are more than 50 feet from the Project Site and as such, no vibration impacts from excavation or construction would occur on these resources as a result of the Project. These resources are prominently located on street corners or along major boulevards, and would remain visually prominent after Project completion. The Project would not change spatial relationships or obstruct views that characterize these historical resources. None of them would be adversely impacted by the Project and they would continue to qualify as historical resources upon Project completion. The Project would have no indirect impact on any of these historical resources.

Demolition of the JWCI would, however, indirectly affect the adjacent New Medical Arts Annex Building at 2208/2210 Santa Monica Boulevard which was designed in a similar Mid-century

Modern style by the same architect as the JWCI, Weldon J. Fulton, and completed in 1955, during the same time period as the JWCI (1950-1966). Because it was designed by the same architect and is similar in style, the New Medical Arts Annex is considered a potentially eligible historical resource. It is important to note that there is an existing pedestrian alley between the JWCI and the New Medical Arts Annex that appears to have been intentionally designed as an original part of the site plan which provides access from the existing parking lot behind the building to Santa Monica Boulevard and the two medical office buildings. Furthermore, the New Medical Arts Annex is similar in style, design, features and materials to the JWCI and appears to have been purposefully designed to relate architecturally to the JWCI. The Project would remove the existing pedestrian alley and replace it with the South Campus East Driveway. The Education & Conference Center and East Ambulatory & Research Building (105 feet high) would be located adjacent to the South Campus East Driveway on the southwest and would be separated from the New Medical Arts Annex by the new 30-foot South Campus East Driveway. Because visual and physical separation between the new Education & Conference Center and East Ambulatory & Research Building and the New Medical Arts Annex Building would be provided by the new 30-foot driveway, the New Medical Arts Annex Building would remain visually prominent along Santa Monica Boulevard. While the Project would remove the existing pedestrian alley, it would be replaced with a new driveway along a similar alignment. Furthermore, the Project would not demolish or alter the New Medical Arts Annex building which is located outside of the Project Site.

However, the Project would change the immediate surroundings and historic setting of the New Medical Arts Annex Building through demolition of the JWCI and replacement of the existing pedestrian alley with a new driveway. These Project related changes would have an adverse indirect impact on the historic setting of the New Medical Arts Building, by destroying the existing historical, architectural and spatial relationships between the building and the JWCI. Although this impact on the historic setting of the New Medical Arts Annex Building would be adverse, because the resource would still retain the basic physical characteristics that convey its historical significance, the impact would be less than significant.

Additionally, the New Medical Arts Annex Building is adjacent to the Project Site and significant vibration impacts from excavation or construction could occur as a result of the Project with the potential to cause damage to historic materials. Therefore, mitigation measure MM HIST-3 is proposed to address potential construction vibration impacts to this potential historic resource.

4.4.4.5 Cumulative Impacts

Although impacts to historical resources tend to be site-specific, cumulative impacts would occur if the Project and cumulative projects would adversely affect historical resources with the same level or type of designation or significance, or involve resources that are significant within the same context. This cumulative impacts analysis for historical resources determines whether the impacts of the Project and the cumulative projects in the surrounding area, when taken as a whole, would substantially diminish the number of historical resources within the same or similar context or property type.

As discussed above, the Project would result in a significant and unavoidable adverse impact to two historical resources (JWCI and CFDC) within the Project Site. Indirect impacts to historical

resources in the vicinity would be less than significant as the Project would not alter or materially impair their eligibility as historical resources. Chapter 3.0 of this EIR provides a list of 131 cumulative approved/pending/future projects that are planned or are under construction in the vicinity of the Project Site. Of these, the nearest cumulative project is 2225 Broadway project (Cumulative Project No. 34), which is an approved mixed-use residential with ground floor commercial project that would be 35 feet in height. As such, this project is located within the same viewshed as the Project.

As described above, the Project would result in a significant and unavoidable direct impact to two historical resources and would have an adverse effect on the historic setting of one adjacent resource, but would not have any substantial adverse change to the eligibility of historical resources in the vicinity of the Project. Following the implementation of the Project, Mid-Century Modern style would remain as a dominant style of medical office within the Santa Monica and greater Los Angeles area. Following implementation of the Project, eligible historical resources and potentially eligible historical resources within the Project vicinity would retain their eligibility for historic designation and the Project's contribution to cumulative impacts would not be cumulatively considerable. Accordingly, the cumulative impact of the Project on surrounding historical resources would be less than significant.

4.4.5 Mitigation Measures

The following mitigation measures have been prescribed to reduce potentially significant impacts on historical resources:

> **MM HIST-1: Recordation of the JWCI and CFDC.** Prior to any demolition or ground disturbing activity on these properties, the Applicant shall retain a Qualified Preservation Professional (defined as an architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture, pursuant to 36 CFR 61) to prepare a Historic American Buildings Survey (HABS) Short Format Report I. The HABS shall record the history of each property, as well as important events or other significant contributions to the patterns and trends of history with which each property is associated, as appropriate. Each property's physical condition, both historic and current, shall be documented through site plans; historic maps and photographs; available original and/or current as-built drawings; large format photographs; and written data and text. Each building's exteriors, representative interior spaces, character-defining features, as well as its setting and contextual views, shall be documented. Field photographs and notes shall also be included. All documentation components shall be completed in accordance with the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation (HABS standards) to the satisfaction of the City of Santa Monica and the HABS administrator. The HABS documentation shall be submitted to the City and National Park Service for transmittal to the Library of Congress, and archival copies shall be sent to the Santa Monica Public Library.
>
> **MM HIST-2: Interpretive Exhibit.** The Applicant shall retain a Qualified Preservation Professional (defined as an architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture, pursuant to 36

CFR 61) to develop and implement a publically accessible interpretive exhibit (Exhibit), in consultation with the Applicant, that captures and incorporates the important history, associations, and significance of the JWCI and CFDC, within the larger context of medical history, so that it is retained for future generations. The Exhibit's requirements shall be outlined in a technical memorandum, including the requirements for maintenance and operation of the Exhibit's elements. The interpretive Exhibit shall be aimed at actively illustrating the following:

- The growth and development of the JWCI and CFDC within the larger context of local, state and national medical history.
- The Exhibit should also document the construction history and architectural significance pertaining to the respected architects, Weldon J. Fulton (JWCI) and John Maloney (CFDC), for each property.
- The historical associations and significance of Dr. Evis Coda (CFDC).

The Exhibit shall include each of the following:

- A permanent on-site exhibit, maintained by the Applicant.
- A professionally conducted oral history program documenting the personal experiences of patients and staff members, which will be utilized within the Exhibit and later archived at the Santa Monica History Museum.

The Applicant shall commission a Qualified Preservation Professional to prepare a technical memorandum detailing the Exhibits' requirements and implementation schedule and this memorandum shall be reviewed by interested parties, such as the Santa Monica History Museum and the Santa Monica Conservancy, and shall be prepared to the satisfaction of the City of Santa Monica. The Applicant shall submit quarterly reports (i.e., January, April, July, and October) prepared by a Qualified Preservation Professional documenting the progress of the Exhibit's implementation, and the Applicant shall submit documentation illustrating full implementation of the Exhibit to the City within 3 years of completion of construction.

MM HIST-3: Construction Monitoring. Due to the potential for damage from excavation and construction activities, as well as vibration, to 2208/2210 Santa Monica Boulevard, and in association with implementation of Mitigation Measure MM NOISE-1, the Qualified Preservation Professional shall monitor construction activities associated with the Project at regular intervals to address any unanticipated damage that may require preservation treatment, and minimize potential damage to historic materials. The Qualified Preservation Professional shall document the construction monitoring process in digital photography, as well as monitoring logs, and prepare a final monitoring report to be submitted to the City's planning department.

4.4.6 Levels of Significance After Mitigation

The Project would cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5, and would result in significant impacts on historical resources due to demolition of the JWCI and CFDC. The Project also has the potential to significantly impact the New Medical Arts Annex Building due to proximate construction and associated vibration effects that could cause structural damage to the building's historic materials. Implementation of the above

mitigation measures would reduce impacts; however, even after implementation of mitigation, impacts to the JWCI and CFDC would remain significant and unavoidable since there is no feasible mitigation to reduce the effects of demolition of these historical resources to a less than significant level. Potential construction vibration impacts to the New Medical Arts Annex Building would be addressed through implementation of MM HIST-3, Construction Monitoring, as presented above, and through implementation of related Mitigation Measure MM NOISE-1, included in Section 4.13, *Noise*, of this EIR. With implementation of these mitigation measures to address construction vibration, potential impacts on the New Medical Arts Annex Building would be reduced to a less than significant level.

4.5 Cultural Resources – Archaeological Resources

4.5.1 Introduction

This section describes the existing setting as it relates to archaeological and paleontological resources and analyzes potential impacts on such resources from implementation of the Project. The analysis of archaeological resources provided in this section is based on the Cultural Resources Technical Report prepared for the Project, which is included in Appendix C of this EIR (Candace et al., 2018).

Archaeology is the recovery and study of material evidence of human life and culture of past ages. Over time, this material evidence becomes buried, fragmented, scattered, or otherwise hidden from view. It is not always evident from a field survey if archaeological resources exist within a project site. Thus, the possible presence of archaeological materials must often be determined based upon secondary indicators, including the presence of geographic, vegetative, and rock features which are known or thought to be associated with early human life and culture, as well as knowledge of events or material evidence in the surrounding area. In urban areas such as the Project Site and its environs, archaeological resources may include both prehistoric remains and remains dating to the historical period. Prehistoric (or Native American) archaeological resources are physical remains resulting from human activities that predate written records and are generally identified as isolated finds or sites. Prehistoric resources can include village sites, temporary camps, lithic (stone tool) scatters, rock art, roasting pits/hearths, milling features, rock features, and burials. Historic archaeological resources can include refuse heaps, bottle dumps, ceramic scatters, privies, foundations, and graves, and are generally associated in California with the Spanish Mission Period to the mid-20th century of the American Period.

4.5.2 Environmental Setting

4.5.2.1 Prehistoric Setting

The chronology of Southern California is typically divided into three general time periods: the Early Holocene (9,600 cal B.C. to 5,600 cal B.C.), the Middle Holocene (5,600 cal B.C. to 1,650 cal B.C.), and the Late Holocene (1,650 cal B.C. to cal A.D. 1769). This chronology is manifested in the archaeological record by particular artifacts and burial practices that indicate specific technologies, economic systems, trade networks, and other aspects of culture.

While it is not certain when humans first came to California, their presence in Southern California by about 9,600 cal B.C. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 9,150 and 9,000 cal B.C. (Byrd and Raab, 2007). During the Early Holocene (9,600 cal B.C. to 5,600 cal B.C.), the climate of Southern California became warmer and more arid and the human populations, who were represented by small hunter gathers until this point and resided mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources (Byrd and Raab, 2007).

During the Late Holocene (1,650 cal B.C. to cal A.D. 1769), many aspects of Millingstone culture persisted, but a number of socioeconomic changes occurred (Erlandson, 1994; Wallace 1955; Warren, 1968). The native populations of Southern California were becoming less mobile and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources (Erlandson, 1994). Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence, towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants (Byrd and Raab, 2007). Between about A.D. 800 and A.D. 1350, there was an episode of sustained drought, known as the Medieval Climatic Anomaly (MCA) (Jones et al., 1999). While this climatic event did not appear to reduce the human population, it did lead to a change in subsistence strategies in order to deal with the substantial stress on resources.

Given the increasing sedentism and growing populations during the Late Holocene, territorial conscription and competition became acute. Primary settlements or village sites were typically established in areas with available freshwater, and where two or more ecological zones intersected (McCawley, 1996). This strategic placement of living space provided a degree of security in that when subsistence resources associated with one ecological zone failed, the resources of another could be exploited (McCawley, 1996). Villages typically claimed and carefully defended fixed territories that may have averaged 30-square miles in size encompassing a variety of ecological zones that could be exploited for subsistence resources (McCawley, 1996).

The Late Holocene marks a period in which specialization in labor emerged, trading networks became an increasingly important means by which both utilitarian and non-utilitarian materials were acquired, and travel routes were extended. Trade during this period reached its zenith as asphaltum (tar), seashells, and steatite were traded from Catalina Island (*Pimu* or *Pimugna)* and coastal Southern California to the Great Basin. Major technological changes appeared as well, particularly with the advent of the bow and arrow sometime after cal A.D. 500, which largely replaced the use of the dart and atlatl (Byrd and Raab, 2007).

CA-LAN-382

CA-LAN-382 is a prehistoric site located approximately 2 miles from the Project Site. The site is described as the remains of a village containing midden soils, various shell fragments, burned animal bones, numerous projectile points, andesite flakes, flaked scrapers, Monterey chert flakes, a chalcedony flake, pottery, one adult post-cranial skeleton, and two Catalina steatite cups (Singer, 1980).

There is also a natural springs located within the boundaries of CA-LAN-382 which is known by multiple names: Serra Springs after Father Junipero Serra, who reportedly said mass on the site in 1770 (Arbuckle, 1980), Tongva Sacred Springs after the Gabrielino Tongva peoples who resided at the site, and the name that the Gabrieleno Tongva people gave to both springs and the village site, *Kuruvungna Springs*, meaning "a place where we are in the sun" (Fisher, 1998). The springs are a designated California State Historical Landmark (No. 522). According to information about the springs on the City of Los Angeles website, in the 1800s the spring served as the water supply for the City.

4.5.2.2 Archaeological Resources

A records search for the Project was conducted on March 20, 2017 at the South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton. The records search included a review of all recorded archaeological resources and studies within 0.5-mile of the Project Site, and architectural resources within 0.25 mile of the Project Site. In addition, the National Register of Historic Places (National Register) and its annual updates and the California Register of Historical Resources (California Register) were reviewed. The records search results indicate that 19 cultural resources studies have been conducted within a 0.5-mile radius of the Project Site. Approximately 84 percent of the 0.5-mile records search radius has been included in previous cultural resources surveys. Of the 19 previous studies, none overlap the Project Site and the Project Site does not appear to have been previously surveyed. The records search results indicate that two historic-period archaeological resources (CA-LAN-3803 and -4666) have been previously recorded within a 0.5-mile radius of the Project Site; however, no archaeological resources have been previously recorded within the Project Site.

The Native American Heritage Commission (NAHC) maintains a confidential Sacred Lands File (SLF) which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on May 18, 2017 to request a search of the SLF. The NAHC responded to the request in a letter dated May 19, 2017. The results of the SLF search conducted by the NAHC indicate that Native American cultural resources are not known (negative results) to be located within the Project Site. During the course of the City's consultation with Native American groups on the NAHC's CEQA Tribal Consultation List, the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) indicated that Santa Monica Boulevard, which bisects the PSJHC Campus, was an ancient Native American trail and trade route. The Kizh Nation indicated that there could be archaeological resources and human remains related to prehistoric travel along the route, such as burials of those who may have died while on the trail (see *Section 4.18, Tribal Cultural Resources,* of the Draft EIR).

4.5.2.3 Existing Conditions

A Phase I Environmental Site Assessment (Phase I ESA) was conducted by Pacific Environmental Company (PEC) in July of 2017 for the properties within the Project Site. PEC reviewed historical records of the Project Site including historic aerial images and Sanborn maps, historic phone directory records, historic building permits on file at the City of Santa Monica, and historic topographic maps. PEC stated that the properties within the Project Site were historically developed with dwellings, a floral and nursery company, and retail uses along Santa Monica Boulevard in the early 1900s (PEC, 2017). The original hospital was developed in 1942 and over the course of 45 years grew with the addition of the three wings and ambulatory care facility by the 1970s. As the hospital expanded, it absorbed the surrounding residential properties (PEC, 2017). The hospital was damaged due the Northridge Earthquake in 1994. As a result, the hospital tower was demolished and reconstructed in 1997. The original hospital building was demolished in the early 2000s and redeveloped by 2010.

Historic maps and aerial photographs were examined to provide historical information about land uses of the Project Site and to contribute to an assessment of the Project Site's archaeological

sensitivity. Available historic topographic maps include the 1896 and 1902 Santa Monica 15-minute quadrangles, the 1925 and 1934 Sawtelle 7.5-minute quadrangles, and the 1966 Beverly Hills 7.5-minute quadrangle. Sanborn maps were available for the years 1918 and 1950. Historic aerial photographs were available for the years 1947, 1952, 1964, 1967, 1972, 1980, 1989, 1994, 2003, 2004, 2005, 2009, 2010, 2012, and 2014 (Historic Aerials, 2018). Review of the 1896 and 1902 historic maps indicate that the closest historical water source (an unnamed drainage) was located approximately 0.20 miles northeast of the Project Site. The available historic maps and aerial photographs indicate that the Project vicinity was largely undeveloped in the late nineteenth century with only the Pasadena and Pacific Railroad, Southern Pacific Railroad, and a few roads present (Wilshire Boulevard) in the future Mid-City Area. By 1902, the development from the townsite of Santa Monica near the Pacific Ocean began creeping northeast and developing around either side of the railroads. This trend continued until the World War I when Santa Monica experienced a population boom and development of the area was expedited. By 1925, a majority of Santa Monica and area was developed and grid system was in place. However, the location of the Project Site remained mostly undeveloped with large parcels still intact in 1934 with some of the properties to the northeast (Westgate, the future site of the Brentwood Country Club) dedicated to oil wells and oil production. After World War II, the majority of Santa Monica was developed with residences, leaving very few parcels available. In the mid-twentieth century much of the area was redeveloped to fulfill the needs of the growing City, including the development of state highways (Olympic and Santa Monica Boulevards), interstates, multi-family housing, and commercial, industrial, and public facilities (hospitals, schools, libraries).

The Project Site included the Orchard and Golden State Tracts, which were subdivided in 1904 and 1906, respectively. Block 128 of the Orchard Tract, the future site of Providence Saint John's Health Center (PSJHC), was partially occupied by the Golden State Plant & Floral Co. and a residence for the manager, Victor E. Hatheway and his family. A portion of block 129, the future site of CFDC, was largely vacant. There was a small school building, as shown on the 1918 Sanborn map. It was later used as baseball fields for the adjacent Ramsey Military School (formerly McKinley Public School). The CFDC playground and pool area were located on the site of an L-shaped building that was built between 1950 and 1952. According to a review of the 1918 Sanborn map, the site of the existing Courtyard Apartment and the John Wayne Cancer Institute were occupied by a dwelling and a plant nursery on block 153 of the Orchard and Golden State Tracts.

An archaeological resources survey of the Project Site was conducted on June 15, 2017 by ESA archaeologist Henry Chodsky, B.A. This survey was aimed at identifying archaeological resources within the Project Site. The developed areas of the Project Site were subject to a reconnaissance-level survey and the landscaped areas were intensively inspected for the presence of archaeological materials. No archaeological resources were identified as a result of the survey.

An archaeological sensitivity assessment of the potential to encounter prehistoric and historic-period archaeological resources within each development site at the Project Site was conducted. The archaeological sensitivity assessment took into account existing conditions, previous historical land uses, nearest known historical water source, geological unit, and proposed ground disturbance. The archaeological sensitivity assessment indicates that development sites S2, S4, and S5 have a

moderate potential for encountering buried archaeological resources, while development sites S1 and S3 have a high potential for encountering buried archaeological resources.

4.5.3 Regulatory Framework

Numerous laws and regulations require State and local agencies to consider the effects of a Project on cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and proscribe the relationship among other involved agencies.

4.5.3.1 Federal

Archaeological Resources

National Register of Historic Places

The National Register was established by the NHPA of 1966, as "an authoritative guide to be used by federal, State, and local governments, private groups and citizens to identify the Nation's historic resources and to indicate what properties should be considered for protection from destruction or impairment" (36 CFR 60.2) (National Park Service, 1995). The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes.

To be eligible for listing in the National Register, a property must be significant in American history, architecture, archaeology, engineering, or culture. Properties of potential significance must meet one or more of the following four established criteria:

A. Are associated with events that have made a significant contribution to the broad patterns of our history;
B. Are associated with the lives of persons significant in our past;
C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
D. Have yielded, or may be likely to yield, information important in prehistory or history.

To be considered for listing under Criterion A, a resource must be associated with one or more events important in history. Criterion A recognizes properties associated with single events, such as the founding of a town, or with a pattern of events, repeated activities, or historic trends. The events or trends, however, must clearly be important within the associated context. Moreover, the resource must have an important association with the event or historic trends – mere association with historic events or trends is not enough, in and of itself to qualify under Criterion A. Examples of archaeological properties eligible under Criterion A include the site of the first evidence of human occupation contemporaneous with now-extinct Pleistocene animals or the site where prehistoric Native Americans gathered annually to exploit seasonal resources or for social interactions (National Park Service, 1995).

Criterion B applies to properties associated with individuals whose specific contributions to history can be identified and documented. Persons "significant in our past" refers to individuals whose activities are demonstrably important within a local, state, or national historic context. The criterion is generally restricted to those properties that illustrate (rather than commemorate) a person's important achievements and productive life, and must be the resource that is most closely associated with that person. Each resource associated with an important individual should be compared to other associated properties to identify those that best represent the person's historic contributions. Examples of archaeological properties eligible under Criterion B include known major villages of individual Native Americans who were important during the contact period or later, such as sites associated with Chief Joseph and Geronimo (National Park Service, 1995).

Criterion C applies to properties significant for their physical design or construction, including such elements as architecture, landscape architecture, engineering, and artwork. To be eligible under Criterion C, a resource must meet at least one of the following requirements: embody distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic value; or represent a significant and distinguishable entity whose components may lack individual distinction. The first requirement, that properties "embody the distinctive characteristics of a type, period, or method of construction," refers to the way in which a resource was conceived, designed, or fabricated by a people or culture in past periods of history. "The work of a master" refers to the technical or aesthetic achievements of an architect or craftsman. "High artistic values" concerns the expression of aesthetic ideals or preferences and applies to aesthetic achievement. A structure is eligible as a specimen of its type or period of construction if it is an important example (within its context) of building practices of a particular time in history. Examples of archaeological properties eligible under Criterion C include those that are important representatives of the aesthetic values of a cultural group, such as petroglyphs and ground drawings by Native Americans (National Park Service, 1995).

Criterion D asks whether a resource has the potential to yield information important to prehistory or history. The most common type of resource eligible under this criterion is archaeological resources. An archaeological resource is eligible under Criterion D if it has the potential to answer important research questions. (National Park Service, 1995).

In addition to meeting one or more of the criteria of significance, a property must have integrity. Integrity is defined as "the ability of a property to convey its significance" (U.S. Department of the Interior 2002). The National Register recognizes seven qualities that, in various combinations, define integrity. These qualities include location, design, setting, workmanship, materials, feeling and association. Since archaeological resources are most commonly eligible under Criterion D, the assessment of integrity typically depends on the data requirements of the applicable research design. A property possessing information potential does not need to recall visually an event, person, process, or construction technique. It is important that the significant data contained in the property remain sufficiently intact to yield the expected important information, if the appropriate study techniques are employed.

4.5.3.2 State

Archaeological Resources

California Register of Historical Resources

The California Register is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). The criteria for eligibility for the California Register are based upon National Register criteria (PRC Section 5024.1[b]). Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance.

It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. A resource that has lost its historic character or appearance may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the California Office of Historic Preservation (OHP) and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historical resources contributing to historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

California Environmental Quality Act

CEQA is the principal statute governing environmental review of projects occurring in the state and is codified at *Public Resources Code (PRC) Section 21000 et seq.* CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA (Section 21084.1), a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

The *CEQA Guidelines* (Title 14 California Code of Regulations [CCR] Section 15064.5) recognize that historical resources include: (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register; (2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) 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 by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record. The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

If a lead agency determines that an archaeological site is a historical resource, the provisions of Section 21084.1 of CEQA and Section 15064.5 of the *CEQA Guidelines* apply. If an archaeological site does not meet the criteria for a historical resource contained in the *CEQA Guidelines*, then the site may be treated in accordance with the provisions of Section 21083, which is as a unique archaeological resource. As defined in Section 21083.2 of CEQA a "unique" archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or,

- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site is to be treated in accordance with the provisions of Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place (Section 21083.1(a)). If preservation in place is not feasible, mitigation measures shall be required. The *CEQA Guidelines* note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (*CEQA Guidelines* Section 15064.5(c)(4)).

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in *CEQA Guidelines* Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired" (*CEQA Guidelines* Section 15064.5(b)(1)). According to *CEQA Guidelines* Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
B. Account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

Human Remains

California Health and Safety Code Sections

California Health and Safety Code Sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable PRC sections), and the disposition of Native American burials in archaeological sites. California Health and Safety Code Section 7050.5 requires that in the event human remains are discovered, the County Coroner be contacted to determine the nature of the remains. In the event the remains are determined to be Native American in origin, the Coroner is required to contact the NAHC within 24 hours to relinquish jurisdiction.

California Health and Safety Code Section 7051 prohibits the removal any part of any human remains from any place where it has been interred without authority of law, or written permission of the person or persons having the right to control the remains under Section 7100. Unlawful

removal is punishable by imprisonment pursuant to subdivision (h) of Section 1170 of the Penal Code.

California Health and Safety Code Section 7054, which prohibits disposal of human remains outside of a cemetery, allows for the reburial of Native American remains outside of a cemetery if done as a result of agreements developed pursuant to PRC Section 5097.94(i), or implementation of recommendations or agreements made pursuant to PRC Section 5097.98.

California Public Resources Code Section 5097.98

California PRC Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the NAHC, upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods.

In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

4.5.4 Environmental Impacts

4.5.4.1 Threshold of Significance

Appendix G of the State CEQA Guidelines provides screening questions that address potential impacts related to cultural resources, including impacts to archaeological resources and human remains.[1] The CEQA guidelines provides that lead agencies may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects, and the use of Appendix G as a significance threshold is routinely sanctioned by the courts (although such use is not mandatory). These questions are listed below and are used as the significance thresholds by the City in this section:

Would the project:

a) Cause a substantial adverse change in the significance of an archeological resource pursuant to State CEQA Section 15064.5?

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

[1] Impacts to historical resources are addressed in Section 4.4, *Historical Resources*, of this EIR.

4.5.4.2 Methodology

Archaeological Resources and Human Remains

The analysis of archaeological resources is based on: (1) a cultural resource records search at the CHRIS-SCCIC at California State University, Fullerton that reviewed recorded archaeological resources and studies within a 0.5-mile radius of the Project Site; (2) an SLF search commissioned through the NAHC; (3) review of available Sanborn Maps, historic aerial imagery; and (4) review of other technical studies (*Phase I Environmental Site Assessment* Appendix – H and *Report of Preliminary Geotechnical Consultation* – Appendix E). This analysis also takes into consideration information provided by the Kizh Nation (see *Section 4.18, Tribal Cultural Resources,* of the Draft EIR).

In addition, on June 15, 2017, a pedestrian cultural resources survey was conducted of the Project Site to observe the Site's surface conditions and search for potential surficial archaeological resources. The Project Site is largely developed with buildings, parking structures, paved surface parking lots, and landscaping. No archaeological resources were observed.

The potential for the Project Site to contain buried archaeological resources was assessed based on the findings of the cultural resource records search (i.e., presence and proximity of known resources), an SLF search, review of technical studies, an archaeological resources survey, and an archaeological sensitivity assessment for the Project.

4.5.4.3 Project Characteristics

The Project proposes to construct new health care and related facilities at the PSJHC Campus over a period of over 20 years, with up to approximately 682,700 new square feet of floor area (660,150 square feet above-grade and 22,550 square feet below grade floor area), 10 replacement multifamily housing units, and enhanced vehicular and pedestrian circulation connections. As part of the Project, some existing buildings, structures, and parking lots would be demolished to make way for new construction. The Project includes the construction of both above-ground and below-ground parking facilities, as well as underground utilities improvements. The maximum depth of ground disturbance would be approximately 55 feet (up to five levels of subterranean parking).

4.5.4.4 Project Impacts

Archaeological Resources

Impact CULT-1-ARCH: *Would the project cause a substantial adverse change in the significance of an archeological resource pursuant to State CEQA Section 15064.5?*

Impact Statement CULT-ARCH-1: Sites S1, S2, S3, S4, and S5 were identified as having a moderate or high potential for prehistoric and/or historic-period archaeological resources. It is possible that physical remnants of prehistoric uses or former historic uses still exist at depth within these five development sites. Therefore, Project grading and excavation may encounter buried archaeological resources. As a result, construction may cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. Impacts to archaeological resources are considered potentially significant.

As discussed above, the records search results at the SCCIC indicate that 19 cultural resources studies have been conducted within a 0.5-mile radius of the Project Site. Approximately 84 percent of the 0.5-mile records search radius has been included in previous cultural resources surveys. Of the 19 previous studies, none overlap the Project Site and the Project Site does not appear to have been previously surveyed. The records search results indicate that two historic-period archaeological resources (CA-LAN-3803 and -4666) have been previously recorded within a 0.5-mile radius of the Project Site; however, no archaeological resources have been previously recorded within the Project Site.

The archaeological sensitivity assessment concluded that Sites S1, S2, S3, S4, and S5 have a moderate or high potential for prehistoric and/or historic-period archaeological resources. This sensitivity determination is based on a combination of the prehistoric and/or historical commercial and residential past land uses, the Holocene age of underlying soil, proximity to historical water sources, and the limited degree of ground disturbance that has occurred within these five development sites. Moreover, the Kizh Nation indicated that Santa Monica Boulevard, which bisects the PSJHC Campus, was an ancient Native American trail and trade route, and there could be associated prehistoric archaeological resources within the Project Site. Because these five development sites have not been subject to as much previous ground disturbance as other development sites, there is a greater likelihood for encountering subsurface prehistoric and/or historic-period archaeological resources associated with previous land uses during construction of the Project. Therefore, Mitigation Measures ARCH-1 through ARCH-3 are prescribed to ensure that potentially significant impacts to archaeological resources are reduced to a less than significant level.

Human Remains

Impact CULT-2-ARCH: *Would the project disturb human remains, including those interred outside of dedicated cemeteries?*

Impact Statement CULT-2-ARCH: The Project Site has been previously disturbed by the original construction of the former and existing uses. However, there are areas that have been subject to less disturbance and the Kizh Nation indicated that there could be human remains related to those who may have died while traveling along a former prehistoric trail and trade route (present-day Santa Monica Boulevard). Project grading and excavation may encounter buried human remains. As a result, construction may disturb human remains, including those interred outside of dedicated cemeteries. Impacts to human remains resources are considered potentially significant.

The results of the record searches from the SCCIC and the NAHC indicated that no human remains have been recorded within the Project Site or a 0.5-mile radius. Moreover, it is possible that the original construction of the former and existing uses at the Project Site have displaced human remains or other types of cultural resources. However, the Kizh Nation indicated that Santa Monica Boulevard, which bisects the PSJHC Campus, was an ancient Native American trail and trade route. The Kizh Nation indicated that there could be human remains related to prehistoric travel along the route, such as burials of those who may have died while on the trail. As a result, in the event that previously unknown human remains are encountered during construction excavations, Mitigation

Measure ARCH-4 is prescribed to ensure that potentially significant impacts to human remains are reduced to a less than significant level.

4.5.4.5 Cumulative Impacts

Cumulative projects occurring in the City and vicinity of the Project could include excavation activities at sites that have been developed historically. Therefore, there is potential to uncover significant archaeological resources and human remains depending on the construction site and sensitivity for archaeological resources and human remains to occur. However, in association with CEQA review, and depending on the depth of excavation and sensitivity of respective sites, mitigation measures would be required for projects on a case by case basis that have the potential to cause significant impacts to undiscovered resources; therefore, the cumulative effects would be less than significant.

The Project is required to comply with mitigation measures MM-ARCH-1 through MM-ARCH-4 and the regulations cited above if resources are found, thus ensuring proper identification, treatment and preservation of any resources, and reducing impacts on archaeological resources and human remains to less than significant levels. These regulations require excavation monitoring, and treatment and curation of discoveries. Therefore, to the extent impacts on archaeological resources and human remains from cumulative projects may occur, the Project's impacts would not be cumulatively considerable, and the cumulative impacts of the Project would be less than significant.

4.5.5 Mitigation Measures

The following mitigation measures have been prescribed to reduce potentially significant impacts on archaeological resources and human remains:

> **MM-ARCH-1:** Prior to the issuance of a demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Qualified Archaeologist) and a Native American monitor from a tribe that is culturally and geographically affiliated with the Project site (according to the Native American Heritage Commission contact list for this project) to provide construction monitoring services for the Project. The Qualified Archaeologist, or an archaeological monitor working under their direct supervision, and the Native American monitor shall monitor all ground disturbance, such as clearing/grubbing, grading, trenching, or any other construction excavation activity, associated with Sites S1, S2, S3, S4, and S5 to a maximum depth of 6 feet (depth at which archaeological sensitivity decreases). The archaeological monitor shall be familiar with the types of resources (prehistoric and historic) that could be encountered. The frequency of archaeological and Native American monitoring shall be determined by the Qualified Archaeologist and shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Full-time archaeological and Native American monitoring may be reduced to part-time inspections, or ceased entirely, at any depth above 6 feet if determined adequate by the Qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and Native American monitor, and will focus on how to identify archaeological resources that may be

encountered during earthmoving activities and the procedures to be followed in such an event.

MM-ARCH-2: In the event that historic (e.g., bottles, foundations, refuse dumps/privies, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the resources are prehistoric or Native American in origin, the Applicant shall coordinate with the City, Qualified Archaeologist, and Native American representatives regarding the treatment and curation of any prehistoric archaeological resources. Additionally, if a discovery is outside of Sites S1, S2, S3, S4, or S5, the Qualified Archaeologist shall determine the level of archaeological monitoring that is warranted during future ground disturbance in other portions of the Project Site. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to PRC Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City (and Native American representatives for prehistoric resources) to develop a formal treatment plan that would serve to reduce impacts to the resource. The treatment plan established for the resource shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a repository that meets the standards outlined in 36 Code of Federal Regulations (CFR) 79.9., if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes, or to an affiliated tribe for prehistoric materials, to be determined by the Qualified Archaeologist in consultation with the City, and with Native American representatives for materials that are prehistoric in nature. Disposition of human remains and associated funerary objects shall be determined through consultation with the Most Likely Descendant (MLD) and landowner (see MM-ARCH-4).

MM-ARCH-3: Prior to the release of the grading bond that is required for a grading permit to guarantee that grading will be completed in conformity with the approved building plans and terms of the grading permit, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Project applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the development and required mitigation measures.

MM-ARCH-4: If human remains are encountered unexpectedly during implementation of the Project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC. The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

4.5.6 Level of Significance after Mitigation

With implementation of the mitigation measures above, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 or disturb any human remains, including those interred outside of dedicated cemeteries. The implementation of the above mitigation measures provides for appropriate treatment and/or preservation of resources if encountered. Potentially significant impacts to archaeological resources and human remains would be reduced to a less than significant level.

4.6 Energy

4.6.1 Introduction

This section analyzes impacts on energy resources due to construction and operation of the Project. This section provides a summary of the Project's anticipated energy needs, impacts, and conservation measures. Information found herein, as well as other aspects of the Project's energy implications, are discussed in greater detail elsewhere in this EIR, including in Chapter 2, *Project Description*, and Sections 4.2, *Air Quality*, 4.8, *Greenhouse Gas Emissions*, 4.11, *Land Use and Planning*, and 4.17, *Transportation*.

4.6.2 Environmental Setting

4.6.2.1 Existing Electricity Sales

Southern California Edison (SCE) is the electricity servicer for the City of Santa Monica (City). SCE provides electricity to approximately 15 million people, 180 incorporated cities, 15 counties, 5,000 large businesses, and 280,000 small businesses throughout its 50,000-square-mile service area (CEC 2017a). In 2017, SCE's total electricity sales in the SCE service area was estimated to be 85,602 GWh (SCE 2018).

SCE produces and purchases their energy from a mix of conventional and renewable generating sources. **Table 4.6-1**, *Electric Power Mix Delivered to Retail Customers in 2017*, shows the electric power mix that was delivered to retail customers for SCE compared to the statewide 2017 power mix. Total electricity sales/usage for SCE is shown in Table 4.6-1 compared to the statewide electricity sales/usage from the most recent year for which data is available.

SCE is required to commit to the use of renewable energy sources for compliance with the Renewables Portfolio Standard. SCE is required to meet the requirement to procure at least 33 percent of its energy portfolio from renewable sources by 2020 through the procurement of energy from eligible renewable resources, to be implemented as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit. SB 350 (Chapter 547, Statues of 2015) further increased the Renewables Portfolio Standard to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027. Eligible renewable resources are defined in the Renewable Portfolio Standard to include biodiesel; biomass; hydroelectric and small hydro (30 Mega Watts [MW] or less); aqueduct hydro power plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multi-fuel facilities using renewable fuels; solar photovoltaic (PV); solar thermal electric; wind; and other renewables that may be defined later. As shown in Table 4.6-1, SCE provided approximately 32 percent of its 2017 electric supply from renewable power.

TABLE 4.6-1
ELECTRIC POWER MIX DELIVERED TO RETAIL[a] CUSTOMERS IN 2017

Energy Resource	2017 SCE	2017 CA Power Mix (for comparison)
Electricity Total Sales/Usage (million kilowatt-hours)	**85,879**	**292,039**
Eligible Renewable	**32% [b]**	**29% [b]**
Biomass & bio-waste	0%	2%
Geothermal	8%	4%
Small hydroelectric	1%	3%
Solar	13%	10%
Wind	10%	9%
Coal	**0%**	**4%**
Large Hydroelectric	**8%**	**15%**
Natural Gas	**20%**	**34%**
Nuclear	**6%**	**9%**
Other	**0%**	**0%**
Unspecified sources of power [c]	**34%**	**9%**
Total	**100%**	**100%**

NOTES:
[a] Retail customers include the following end-use customers: residential, commercial, and industrial users.
[b] Percentages are estimated annually by the CEC based on the electricity sold to California consumers during the previous year.
c "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources.

SOURCES:
California Energy Commission, Total System Electric Generation, 2017 Total System Electric Generation in Gigawatt Hours. Available at: http://energy.ca.gov/almanac/electricity_data/total_system_power.html. Accessed September 2018.

California Energy Commission, 2017 Power Content Label, Southern California Edison – Default. Available at: https://www.sce.com/wps/wcm/connect/6ee40264-673a-45ee-b79a-5a6350ed4a50/2017PCL.pdf?MOD=AJPERES. Accessed September 2018.

Edison International, Energy for What's Ahead: Edison International and Southern California Edison 2017 Annual Report. Available at https://www.edison.com/content/dam/eix/documents/investors/sec-filings-financials/2017-financial-statistical-report.pdf. Accessed September 2018.

In February 2019 for residential customers and May 2019 for non-residential customers, Clean Power Alliance (CPA) became the new electricity supplier for Santa Monica. With this change, CPA purchases electricity from renewable sources and partners with SCE to distribute electricity to residential and commercial customers throughout the City. CPA is a Joint Powers Authority (JPA) made up of public agencies across Los Angeles and Ventura counties working together to bring clean, renewable power to Southern California. With the recent switch in energy providers, electricity customers in Santa Monica are automatically defaulted to have 100% renewable energy serving their electricity needs. Alternatively, customers can opt to have their electricity power consisting of 50% renewable content or 36%, or opt out of the CPA to remain with SCE as their provider.

4.6.2.2 Existing Natural Gas Supply

Natural gas is used for cooking, space heating, water heating, electricity generation, and as an alternative transportation fuel. Southern California Gas Company (SoCalGas) is responsible for providing natural gas supply to the City and is regulated by the California Public Utilities Commission and other state agencies. The annual natural gas sale to customers in 2017 (the most recent year for which data is available) is shown in **Table 4.6-2**, *Natural Gas Delivered to Retail Customers in 2017*. Total natural gas sales/usage for SoCalGas is compared to the statewide natural gas sales/usage from the corresponding year in Table 4.6-2.

TABLE 4.6-2
NATURAL GAS DELIVERED TO RETAIL CUSTOMERS IN 2017

Energy Resource	2017 SoCalGas[a,b]	2017 California (for comparison)[c]
Natural Gas Total Sales/Usage (million cubic feet)	913,960	2,048,294

NOTES:
[a] 2018 California Gas Report, California Gas and Electric Utilities, p. 101 Available at: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf. Accessed February 2019.
[b] SoCalGas 2017 daily sales/usage was 2,504, million cubic feet per day. Daily rate was multiplied by 365 days to estimate annual sales/usage.
[c] United States Energy Information Administration, Natural Gas Consumption by End Use. https://www.eia.gov/dnav/ng/ng_cons_sum_dcu_SCA_a.htm. Accessed February 2019

4.6.2.3 Existing Transportation Energy

According to the California Energy Commission (CEC), transportation accounts for nearly 37 percent of California's total energy consumption (CEC 2017b). The annual transportation fuel consumption of diesel and gasoline in 2017 in California (the most recent year for which statewide data is available) is shown in **Table 4.6-3**, *Transportation Fuel Consumption in 2017*. Total transportation fuel consumption of diesel and gasoline for Los Angeles County is shown in Table 4.6-2 and compared to statewide values. The estimated Los Angeles County and Statewide transportation fuel consumption is based on retail sale data from the California Energy Commission.

TABLE 4.6-3
TRANSPORTATION FUEL CONSUMPTION IN 2017

Energy Resource	Los Angeles County	California (for comparison)
Diesel (million gallons)	590	3,798
Gasoline (million gallons)	3,659	15,584

SOURCE: California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2017. Available at: https://www.energy.ca.gov/almanac/transportation_data/gasoline/piira_retail_survey.html. Accessed February 2019. Diesel is adjusted to account for retail (51%) and non-retail (49%) diesel sales.

4.6.2.4 Existing Project Site

The Phase II development sites have a total land area of approximately 407,100 square feet that is served by SCE and SoCalGas. The existing uses to be removed include the approximately 34,670 square-foot Child & Family Development Center with an approximately 585 square-foot pool house, the approximately 10,800 square-foot Providence Saint John's Foundation Building, the approximately 51,055 square-foot John Wayne Cancer Institute and the two approximately 2,675 square-foot temporary MRI modular buildings. Energy demand from the existing uses is incorporated into this analysis to determine the Project's net (Project minus existing) energy consumption. Current annual electricity demand for the Project Site's existing uses to be removed is approximately 1.63 million kWh and its natural gas demand is approximately 4.21 million kBtu. Based on the estimated trips generated by the existing uses, its diesel fuel demand is approximately 19,417 gallons, and its gasoline demand is approximately 197,809 gallons.

4.6.3 Regulatory Framework

4.6.3.1 State

Title 24, Building Standards Code and California Green Building Standards (CALGreen) Code

The CEC first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations (CCR), Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The California Building Standards Commission (CBSC) adopted Part 11 of the Title 24 Building Energy Efficiency Standards, referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." The CALGreen Code establishes mandatory measures for new residential and non-residential buildings, which include requirements for energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code was most recently updated in 2016 to include new mandatory measures for residential as well as nonresidential uses. The new measures took effect on January 1, 2017.

4.6.3.2 Local

Santa Monica General Plan Land Use and Circulation Element (LUCE)

The LUCE includes policies, programs, and objectives that address sustainability, including energy conservation, which are applicable to the Project:

Policy LU16.1: Design Buildings with Consideration of Solar Patterns. In designing new buildings, consider the pattern of the sun, the impact of the building mass throughout the day and the year to create habitable outdoor spaces and protect adjacent structures to minimize shadows on public spaces at times of the day and year when warmth is desired and provide shade at times when cooling is appropriate, and minimize solar disruption on adjacent properties.

Policy LU16.2: Preserve Solar Access to Neighborhoods. The same development standard that is adopted to require a step down building envelope to transition commercial buildings to lower adjacent residential properties also needs to assure solar access to the residential buildings.

Policy S3.1: Actively strive to implement the City's "zero net" electricity consumption goal by 2020 through a wide variety of programs and measures, including the generation of renewable energy in the City and energy efficiency measures.

Policy S3.2: Consider a requirement for all new residential buildings to use net zero energy by 2020 and all new commercial buildings by 2030.

Policy S3.4: Explore creating an ordinance to require all buildings sold in Santa Monica to meet minimum energy efficiency requirements with energy efficiency upgrades occurring at the time of resale and prior to the transfer of title.

Policy S4.1: Explore creating an ordinance to require solar installations, both photovoltaic and hot water, on new construction projects.

Policy S4.4: Continue to maintain the Solar Santa Monica Program to help finance and provide technical know-how for residential and commercial solar installations.

Policy S5.1: Continue to maintain a Building Code and prescriptive compliance options that meet or exceed state requirements for energy, water and other sustainability standards. Specifically, pursue California Energy Commission goals to achieve net zero energy buildings by 2020 for low-rise residential buildings and 2030 for commercial buildings and achieve a Leadership in Energy and Environmental Design (LEED)- equivalent building code by 2020.

Policy S5.4: Consider a requirement that all new construction utilize solar water heaters.

Policy S5.5: Encourage shade trees on south- and west-facing sides of all new buildings to reduce building energy loads.

Policy S5.6: Encourage cool roofs or green roofs on new buildings.

Policy S5.7: Encourage cool paving on new plazas and parking lots.

Policy S5.8: Encourage installation of electrical outlets in loading zones and on the exterior of new buildings to reduce emissions from gas-powered landscape maintenance and operating refrigeration for delivery trucks.

Sustainable City

The Santa Monica City Council initially adopted the Santa Monica Sustainable City Plan (SCP) in September 1994, with updates occurring three times most recently in January 2014. The SCP provides goals and strategies for the City to follow to enhance the City's sustainability, inclusive of reducing greenhouse gas emissions (GHG). It includes nine goal areas that cover a range of environmental, economic and cultural activities. Of these, two goal areas are particularly relevant to the City reductions in Energy Conservation: Resource Conservation and Environmental/Public Health.

The SCP goals pertaining to Resource Conservation and Environment and Public Health more directly address the generation of GHG emissions. The Resource Conservation goals directly address such topics as use of renewable energy and reductions in air, soil and water pollutants. The Resource Conservation Goals also set GHG emissions reduction targets for the City in order to address climate change impacts. These targets, if achieved, would result in greater GHG emissions reductions than those set by the State, at least in the short term.

The existing SCP 2014 update includes targets of reducing GHG emissions by 20 percent below 1990 levels Citywide by 2020, by 30 percent below 1990 levels for corporate operations by 2020, and by 80 percent below 1990 levels by 2050. For the 2030 target, this equates to an emissions level of 647,005 metric tons of carbon dioxide equivalents ($MTCO_2e$). The SCP anticipates most reductions will come from increased energy efficiency, increased renewable energy production, and reduced transportation-related emissions through increased use of alternative transportation.

Santa Monica Municipal Code: Chapter 8.36 Energy Code

On October 25, 2016, Santa Monica City Council adopted the Energy Code as Chapter 8.36 of the SMMC. The Energy Code states that all new low-rise residential buildings shall be designed to use fifteen percent (15%) less energy than the allowed energy budget established by the 2016 California Energy Code, and achieve an Energy Design Rating of Zero. For high-rise residential, non-residential, hotels and motels, these buildings shall be designed to use ten percent (10%) less energy than the allowed energy budget established by the 2016 California Energy Code. Buildings constructed under the Project would be required to comply with the applicable provisions of the City's Energy Code in effect at the time of building permit issuance.

Santa Monica Municipal Code: Chapter 8.106 Green Building Standards Code

Chapter 8.106 of the SMMC establishes the City's Green Building Standards Code. This code adopts by reference the CalGreen requirements with the local amendments that require solar pool heating and solar PV installations. Under the City's Green Building Standards the following requirements are applicable to the Project:

- New multi-family dwellings (3 stories or less), non-residential, high-rise residential, hotel, and motel buildings are required to install a solar electric PV system. The required installation of the PV system shall be implemented by installing a solar PV system with a minimum total wattage 2.0 times the square footage of the building footprint (2.0 watts per square foot). That means a four-story building with a building footprint of 10,000 square feet would need a 20 kilowatt system.

- Electric vehicle charging shall be provided for new electrical services in both multi-family dwellings and non-residential buildings.

Santa Monica Municipal Code: Chapter 8.108 Green Building, Landscape Design, Resource Conservation and Construction and Demolition Waste Management Standards:

This chapter of the Santa Monica Municipal Code (SMMC) provides requires new development projects to comply with Water-Efficient Landscape and Irrigation Standards. Project must include a submission of plans and reports to the City for review and approval prior to the installation of landscaping and/or irrigation system. This section also requires construction and demolition projects to meet a minimum 70 percent diversion rate and submit a waste management plan for City approval.

4.6.4. Environmental Impacts

4.6.4.1 Thresholds of Significance

The significance criteria used to evaluate project impacts to energy are qualitative and directly based on the questions addressing energy in Appendix G of the State CEQA Guidelines. The CEQA guidelines provides that lead agencies may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects, and the use of Appendix G as a significance threshold is routinely sanctioned by the courts (although such use is not mandatory). These questions are listed below and are used as the significance thresholds by the City in this section.

Would the project:

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

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

4.6.4.2 Methodology

Construction

Construction of the Project would consume energy as a result of the use of heavy-duty construction equipment, on-road trucks, and construction workers commuting to and from the Project Site.

Electricity consumption would be limited to the use of electrically powered hand tools and/or small equipment, nighttime lighting, and potentially for construction trailers that could be located on-site. Based on the proposed development program and engineering estimates that form the basis of the construction-related impact analyses, heavy-duty construction equipment would be primarily diesel-fueled. The use of natural gas powered equipment would be atypical. The assumption that diesel fuel would be used for all equipment represents the most conservative scenario for maximum potential energy use during construction. Energy demand (specifically fuel consumption) from heavy-duty construction equipment is estimated based on the equipment analyzed in the California Emissions Estimator Model (CalEEMod), consistent with the air quality analysis in Section 4.2, *Air Quality*, and Section 4.8, *Greenhouse Gas Emissions*, of this EIR, and fuel consumption data from the California Air Resources Board (CARB) OFFROAD2011 model.

Operation

Overall, the Project's energy consuming sources are consistent with the air quality analysis in this EIR. Operation of the Project would consume energy in the form of electricity and natural gas for building heating, cooling, cooking, lighting, water demand and wastewater treatment, consumer electronics, and other energy needs; transportation-fuels, primarily gasoline, for vehicles traveling to and from the Project; diesel consumption for the maintenance and testing of emergency generators, and natural gas consumption for the Project's proposed new combined heat-and-power (CHP) system. The CHP uses natural gas to produce both heat and electricity for building operations.

Annual electricity and natural gas usage for the Project's buildings were estimated using CalEEMod. Building energy consumption was based on the size of the proposed development, energy use factors, and water demand factors. The energy usage takes into account building energy standards pursuant to the 2016 Title 24 Building Standards Code, CALGreen Code, and City's Green Building Standards. The assessment also includes a discussion of the Project Design Features which would reduce energy and water usage, as well as encourage recycling and waste diversion, above and beyond State regulatory requirements. Physical and operational Project characteristics for which sufficient data are available to quantify the reductions from building energy and resource consumption have been included in the quantitative analysis, and include but are not limited to the measures discussed in Project Design Feature PDF-AQ-2, Green Building Features (see Section 4.2, *Air Quality*, and Section 4.8, *Greenhouse Gas Emissions*, in this EIR).

Since May 2019, all residential and commercial users in the City receive its electricity from the CPA. The CPA buys electricity from renewable sources and partners with Southern California Edison to distribute electricity to residential and commercial customers throughout the City. The City has chosen 100 percent Green Power as a step to reaching carbon neutrality. Since the Project would consume electricity generated from renewable sources, the Project would have no impact on SCE's electricity resources. The Project's annual electricity consumption is provided for informational purposes only.

Gasoline and diesel consumption for transportation from residents, employees, and visitors to the Project Site were estimated based on the predicted number of trips to and from the Project Site and the estimated VMT determined in the Traffic Study for the Project (Appendix L). The estimated fuel economy for vehicles is based on fuel consumption factors from the California Air Resources Board's (CARB) EMission FACtors model (EMFAC) model. Fuel consumption factors were based on the Project's buildout year of 2041. As discussed above, EMFAC is incorporated into CalEEMod, which is a state-approved emissions model used for the Project's air quality and GHG emissions assessment. Therefore, this energy assessment is consistent with the modeling approach used for other environmental analyses in this EIR and consistent with general CEQA standards. Energy consumption from stationary sources would include diesel fuel from emergency generator use and natural gas use from the CHP system. Emergency generator fuel consumption was estimated using annual carbon dioxide emissions and fuel consumption factors from The Climate

Registry.[1] The CHP system's natural gas consumption was based on its annual operating hours and Consumption of operational natural gas use would primarily be attributable to the Project's new CHP system.

4.6.4.3 Project Characteristics

Construction

The Project would require the demolition of existing buildings, surface parking areas, and associated landscaping. These activities would require excavation and off-site hauling of soils. The total demolition material (e.g., removed asphalt) would be approximately 15,975 cubic yards and require approximately a total of 1,599 trucks (10 cubic yards per truck) over the course of Project construction. The total excavation required for the Project is approximately 919,662 cubic yards and require approximately a total of 91,966 trucks (10 cubic yards per truck) over the course of Project construction. Excavation would be performed pursuant to SCAQMD rules which control air pollutant emissions. Excavation along with related shoring activities would require the use of equipment such as: front loader, tracked excavator, skid steer, haul trucks, drill rig, compressor, small tools and light trucks.

Section 4.2, *Air Quality*, of this EIR, contains detailed construction information related to the demolition debris and soil excavation quantities, as well as the number of trucks required to transport demolition debris and soil off-site. Fuel consumption was based on the number of trucks trips and trip lengths. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling to reduce public exposure to diesel particulate matter and other toxic air contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than 5 minutes at any given time. While intended to reduce construction criteria pollutant emissions, compliance with the anti-idling regulation would also result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy.

Operation

Energy Conservation: Land Use Characteristics and Project Design Features

The Project would provide for the expansion of uses and improvements within the Providence Saint John's Health Center (PSJHC) Campus (PSJHC), located near existing off-site commercial (including medical) and multifamily residential buildings. The Project Site lies in close proximity to existing public transit services with nearby facilities to support alternative modes of transportation, which would result in reduced vehicle trips and VMT compared to a project without these characteristics. Development patterns that reduce VMT, such as those of the Project, reduce consumption of energy.

The California Air Pollution Control Officers Association (CAPCOA) has provided guidance for accounting for GHG emission reductions from land use development projects within its guidance document titled *Quantifying Greenhouse Gas Mitigation Measures.* In addition to reducing GHGs,

[1] The Climate Registry, 2018 Default Emission Factors, May 2018, https://www.theclimateregistry.org/wp-content/uploads/2018/06/The-Climate-Registry-2018-Default-Emission-Factor-Document.pdf. Accessed April 2019.

the following characteristics have the co-benefit of reducing transportation energy use due to location efficiency:

- **Increased Density:** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces GHG emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies such as enhanced transit services. This measure corresponds to CAPCOA guidance measure LUT-1 (CAPCOA 2010a).

  According to the Project Traffic Study (Appendix L), Project trip generation estimates were developed primarily using locally-developed Santa Monica land use trip generation rates. Santa Monica is generally characterized by compact urban development, high levels of public transit service, walkable and bike-friendly streets, and employer-sponsored Transportation Demand Management (TDM) programs. The unique local characteristics of Santa Monica (such as density, availability of transit, diversity of land uses) require the development of specific trip generation rates to estimate trips associated with land uses in Santa Monica. These Santa Monica-specific trip rates are more appropriate for estimating trip generation rather than standard Institute of Transportation Engineers rates which are more reflective of suburban locations. The Project trip generation rates for most of the proposed land uses are drawn from the *Santa Monica Travel Demand Forecasting Model Trip Generation Rates*, including the hospital, day care, residential, restaurant, medical office, retail, and office uses (Fehr & Peers 2019). Therefore, LUT-1 is incorporated into the trip generation estimated for the Project.

- **Location Efficiency:** Location efficiency refers to the location of a project relative to the type of urban landscape, such as an urban area, compact infill, or suburban center. In general, compared to the statewide average, a project could realize VMT reductions up to 65 percent in an urban area, up to 30 percent in a compact infill area, or up to 10 percent in a suburban center for land use/location strategies (SCAG 2016).[2] This measure corresponds to CAPCOA guidance measure LUT-2 (CAPCOA 2010b). According to the CAPCOA guidance, factors that contribute to VMT reductions under this measure include the geographic location of a project within the region.

  The Project Site is located in the City of Santa Monica, in the western portion of Los Angeles County. All Phase II Development Sites are located on the PSJHC Campus, as noted previously, which itself is located within the City's Healthcare Mixed Use District in an area generally bounded by Arizona Avenue to the north, Broadway to the south, 20th Street to the west, and 23rd Street to the east. The PSJHC Campus is accessible to the regional transportation network, located approximately 0.9-mile north of the Santa Monica Freeway (Interstate 10) ramps at Cloverfield Boulevard. The Project Site is served by existing public transportation of a bus transit system located within a one-half-mile, the Expo Light Rail system within 0.8-mile, and three Breeze Bike Share Hubs within one-half mile. The location efficiency of the Project Site would reduce vehicle trips and VMT compared to the statewide and Air Basin average,

2 CalEEMod, by default, assumes that trip distances in the Air Basin are slightly longer than the statewide average. This is due to the fact that commute patterns in the Air Basin involve a substantial portion of the population commuting relatively far distances, which is documented in the Southern California Association of Governments 2016-2040 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). The RTP/SCS shows that, even under future Plan conditions, upwards of 50 percent of all work trips would be 10 miles or longer (SCAG, Performance Measures Appendix, p. 13, 2016). The RTP/SCS does not specify the current percentage of work trips greater than 10 miles in the region, but it can be assumed that the percentage is currently greater than 50 percent since the goal of the RTP/SCS is to reduce overall VMT in the region. It is thus reasonable to assume that the trip distances in Air Basin are analogous to the statewide average given that the default model trip distances in the Air Basin are slightly longer but still generally similar to the statewide average. Therefore, projects could achieve similar levels of VMT reduction (65 percent in an urban area, 30 percent in a compact infill area, or 10 percent for a suburban center) compared to the Air Basin average.

and would result in corresponding reductions in transportation-related energy. Therefore, LUT-2 is incorporated into the trip generation for the Project.

- **Increased Land Use Diversity and Mixed-Uses:** Locating different types of land uses near one another can decrease VMT since vehicle trips between land use types are shorter and could be accommodated by alternative modes of transportation, such as public transit, bicycles, and walking. This measure corresponds to CAPCOA guidance measure LUT-3 (CAPCOA 2010c). According to the CAPCOA guidance, factors that contribute to VMT reductions under this measure include the percentage of each land use type in the development.

  The Project would locate complementary child & family development including daycare, residential, medical, and restaurant land uses in close proximity to existing off-site commercial and residential uses. According to the Project traffic impact analysis, the trip rates reflect Santa Monica's unique local characteristics of density, availability of transit, and diversity of land uses (Fehr & Peers 2019). Therefore, LUT-3 is incorporated into the trip generation for the Project.

- **Increased Destination Accessibility:** This measure corresponds to CAPCOA guidance measure LUT-4 (CAPCOA 2010d). According to the CAPCOA guidance, factors that contribute to VMT reductions under this measure include the distance to downtown or major job center.

  The Project would be located in an area that offers access to multiple other nearby destinations including commercial, restaurant, bar, office, retail, and residential uses. The Project Site is also located near other medical job centers in the region and the downtown Santa Monica area. The access to multiple destinations in close proximity to the Project Site would reduce vehicle trips and VMT compared to the statewide and Air Basin average, encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in transportation-related emissions. Therefore, LUT-4 is incorporated into the trip generation for the Project.

- **Increased Transit Accessibility:** Locating a project with high density near transit facilitates encourages the use of transit by people traveling to or from a project site. This measure corresponds to CAPCOA guidance measure LUT-5 (CAPCOA 2010e). According to the CAPCOA guidance, factors that contribute to VMT reductions under this measure include the distance to transit stations near the Project.

  The Project would be located within one-half-mile of public transportation, including a bus transit system located within a one-half-mile, the Expo Light Rail system within 0.8-mile, and Three Breeze Bike Share Hubs within one-half mile. The Project would provide access to on-site uses from existing pedestrian pathways, and provide parking for bicycles on-site to encourage utilization of alternative modes of transportation. The City of Santa Monica hosts a dense network of bicycle facilities including some immediately adjacent to the Project site. Running along the southern boundary of the South campus of the PSJHC, the Broadway bike lanes are located adjacent to the Project and is a dedicated bike path that serves as the City's primary east-west bike corridor. The Project is also located near numerous Breeze Bike Share Hubs. The estimated Project trip generation reflect Santa Monica's compact urban development, high levels of public transit service, and walkable and bike-friendly streets (Appendix L). Therefore, LUT-5 is incorporated into the trip generation for the Project.

- **Provide Pedestrian Network Improvements:** Providing pedestrian access that minimizes barriers and links a project site with existing or planned external streets encourages people to walk instead of drive. This measure corresponds to CAPCOA guidance measure SDT-1 (CAPCOA 2010f). According to the CAPCOA guidance, factors that contribute to VMT

reductions under this measure include pedestrian access connectivity within the Project and to/from off-site destinations.

As discussed in Chapter 2.0, *Project Description*, the Project would improve pedestrian connectivity and the pedestrian experience in the Project area by connecting the various buildings within the North and South campuses of the PSJHC with new pedestrian friendly streets and pathways. Additionally, the Project would provide pedestrian-oriented buildings within the Campus. According to the Project Traffic Study, the trip rates reflect "characteristics such as higher built environment density, numerous transit lines, and a greater share of pedestrian trips". Therefore, SDT-1 is incorporated into the trip generation for the Project.

In addition to the above land use characteristics that reduce transportation energy, the Project would incorporate sustainable design features that would reduce energy demand such as energy efficient HVAC systems that would meet or exceed the Code's requirement, capacity for electric vehicle recharging, LED lighting, and water-efficient fixtures and plumbing infrastructure. These measures that would contribute to energy efficiencies are described in more detail in Project Design Feature PDF-AQ-2: Green Building Features, in Section 4.2, *Air Quality*, and Section 4.8, *Greenhouse Gas Emissions*, in this EIR. In addition, Providence Saint John's would implement an enhanced TDM plan to be negotiated as part of the Development Agreement (refer to Section 4.17, *Transportation*, in this EIR).

4.6.4.4 Project Impacts

Energy Consumption

Impact Energy-1: *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Impact Statement ENERGY-1: The Project would include sustainable design features that would improve energy efficiency beyond the standard regulatory requirements. Furthermore, the Project's land use characteristics (such as proximity to transit and a variety of uses) and location would minimize vehicle trips and VMT. As the Project would achieve greater than required energy efficiency, it would not result in the wasteful, inefficient, or unnecessary consumption of energy resources.

Construction

Construction of the Project would result in energy consumption from the use of heavy-duty construction equipment, on-road trucks, and construction workers commuting to and from the Project Site.

Electricity would be used during construction to provide temporary power for lighting and electronic equipment (e.g., computers, etc.) and to power certain construction equipment (e.g., hand tools or other electric equipment) would generally not result in a substantial increase in on-site electricity use. Electricity use during construction would be variable depending on lighting needs and the use of electric-powered equipment and would be temporary for the duration of construction activities. It is expected that construction electricity use would generally be considered as temporary and negligible over the long-term.

Based on the proposed development program and engineering estimates that form the basis of the construction-related impact analyses, heavy-duty construction equipment would be primarily diesel-fueled. The assumption that diesel fuel would be used for all equipment represents the most conservative scenario for maximum potential energy use during construction. The estimated total diesel fuel that would be consumed by heavy-duty construction equipment is shown in **Table 4.6-4**, *Project Construction Fuel Usage*. Calculation details are provided in Appendix D of this EIR.

TABLE 4.6-4
PROJECT CONSTRUCTION FUEL USAGE

Source	Total Gallons of Diesel Fuel	Total Gallons of Gasoline Fuel
Construction:		
Heavy-Duty Construction Equipment	919,452	—
Haul Trucks	612,700	—
Vendor Trucks	187,550	—
Worker Trips	—	650,255
Total (over the approximately 20.5-year construction duration)	**1,719,702**	**650,255**

SOURCE: ESA 2019.

It is estimated that a maximum of approximately 188,484 one-way truck trips would be required to haul the material to off-site reuse and disposal facilities over the approximately 20.5-year construction period. The Project is estimated to generate approximately 179,944 one-way vendor truck trips for the delivery of building materials and supplies to the Project Site over the construction period. Based on the CARB on-road vehicle emissions model, EMFAC2014, heavy-duty haul trucks and vendor trucks operating in the South Coast Air Basin would have an estimated average fuel economy of approximately 6.2 and 6.7 miles per gallon in 2021. Although construction would occur over 20.5 years, 2021 fuel economy vales were used to provide a conservative assessment as fuel economies would increase in future years.

The number of construction workers that would be required would vary based on the phase of construction and activity taking place. The transportation fuel required by construction workers to travel to and from the Project Site would depend on the total number of worker trips estimated for the duration of construction activity. According to the EMFAC2014 model, passenger vehicles operating in the South Coast Air Basin would have an average fuel economy of approximately 25.9 miles per gallon based on calendar year 2021 fuel data for light-duty automobiles and light-duty trucks. Assuming construction worker automobiles have an average fuel economy consistent with the EMFAC2014 model and given the total vehicle miles traveled for construction workers, based on engineering estimates provided in CalEEMod used for the air quality and GHG emissions assessment, workers would travel a total of approximately 16.8 million miles. Based on the information described above, the total gasoline fuel was estimated for workers and is also shown in Table 4.6-4. The Project would seek to hire construction workers from the local workforce, which would minimize commuting distances and overall vehicle miles traveled. Hiring from the local workforce would reduce fuel consumption and reduce the wasteful, inefficient, and unnecessary consumption of energy.

For comparison purposes, the Project's construction energy demand from transportation fuel is compared to the Los Angeles County transportation fuel sales. As shown in **Table 4.6-5**, *Comparison of Project Construction and County Fuel Usage*, the Project would represent a very small fraction of the County's total fuel consumption. Furthermore, construction of the Project would result in short-term and temporary energy demand lasting approximately 20.5 years. As such, the Project would not increase the need for new energy infrastructure.

TABLE 4.6-5
COMPARISON OF PROJECT CONSTRUCTION AND COUNTY FUEL USAGE

Source	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Los Angeles County (in 2017) [a]	590,196,078	3,659,000,000
Annual Project Construction	83,826	31,696
Percent of County	0.014%	0.0009%

[a] California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2017. Available at: https://www.energy.ca.gov/almanac/transportation_data/gasoline/piira_retail_survey.html. Accessed February 2019. Diesel is adjusted to account for retail (51%) and non-retail (49%) diesel sales.

SOURCE: ESA 2019.

Conclusion Regarding Construction-Related Energy Consumption

Construction of the Project would require the consumption of energy for necessary on-site activities and to transport materials, soil, and debris to and from the Project Site. The amount of energy used would not represent a substantial fraction of the available energy supply in terms of equipment and transportation fuels. Furthermore, compliance with the previously discussed anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Therefore, construction of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure. Construction energy impacts would be less than significant.

Operation

Operational energy consumption would occur as a result of each building's energy needs and the use of transportation fuels (e.g., diesel and gasoline) associated with vehicles traveling to and from the Project Site. This analysis estimates the maximum operational energy consumption to evaluate the Project's associated impacts on energy resources.

Daily operation of the Project would consume energy in the form of electricity and natural gas. Additionally, energy would be consumed for the conveyance and treatment of water, wastewater, and the disposal of solid waste off-site. Building energy use factors and water demand factors from CalEEMod, consistent with the Project analyses conducted for air quality and greenhouse emissions, are used to estimate building energy use. The Project's estimated net operational electricity demand, including from water demand, is provided in **Table 4.6-6**, *Project Operational Electricity Usage*. The Project would install solar electric PV systems, as required by the City's Green Building Code Solar Ordinance. With implementation of PDF-AQ-2, the Project will reduce indoor potable water use by a minimum of 40 percent and outdoor potable water use by a minimum

of 50 percent compared to baseline water consumption than required by California 2016 Title 24 Building Energy Efficiency Standards. The Project would be designed to meet the applicable standards of the City's Energy Code at the time of building permit issuance. These energy saving features are included in the electricity estimates in Table 4.6-6. As previously discussed, with the City's recent change to Clean Power Alliance, it is anticipated that the Project would consume electricity from renewable sources and would have no impact on SCE's electricity generation. Calculation details are provided in Appendix D of this EIR.

TABLE 4.6-6
PROJECT OPERATIONAL ELECTRICITY USAGE

Source	Electricity Per Year (million kWh)
SCE Electricity Sales (2017) [a]	85,879
Project Operations:	
Building Electricity [b]	13.02
Water Electricity [c]	1.27
Existing Operations:	1.63
Project Net Total	12.67

NOTES:
[a] Refer to Table 4.6-1.
[b] Electricity is calculated in Section 4.8, *Greenhouse Gas Emissions*, of this EIR using CalEEMod (includes water-related electricity for conveyance and treatment).
[c] Electricity for water supply, treatment, distribution, and wastewater treatment.
SOURCE: ESA 2018

The Project's estimated net operational natural gas demand is provided in **Table 4.6-7**, *Project Operational Natural Gas Usage*. As operation of the Project would incorporate measures that would improve energy efficiency beyond regulatory requirements, the Project would clearly reduce the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure. Operational energy impacts would be less than significant.

Operational Transportation Energy Consumption

Operation of the Project would result in transportation energy use. Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. The Project's estimated operational transportation fuel demand is provided in **Table 4.6-8**, *Project Operational Fuel Usage*. Calculation details are provided in Appendix D of this EIR.

With respect to operational transportation-related fuel usage, the Project would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. The Project would support sustainable mobility options by locating hospital, retail/restaurant, daycare, and residential land uses at an infill location in close proximity to existing off-site commercial, residential, and retail destinations and in close proximity to many public transit routes. As discussed in Section 4.2, *Air Quality*, and Section 4.8, *Greenhouse Gas Emissions*, in this EIR, the Project is located in the Mid-City District of the City within one-

half-mile of public transportation, including a bus transit system located within a one-half-mile, the Expo Light Rail system within 0.8-mile, and three Breeze Bike Share Hubs within one-half mile.

TABLE 4.6-7
PROJECT OPERATIONAL NATURAL GAS USAGE

Source	Natural Gas Per Year (million kBtu)
SoCalGas Natural Gas Sales (2017) [a]	913,960
Project Operations: [b]	43.78
Existing Operations	4.07
Net Project Operations	39.71
Percent of SoCalGas	0.004%

NOTES:
[a] Refer to Table 4.6-2.
[b] Includes natural gas consumed by Cogeneration engines. Natural gas is calculated in Section 4.8, *Greenhouse Gas Emissions*, of this EIR using CalEEMod.
SOURCE: ESA 2019

TABLE 4.6-8
PROJECT OPERATIONAL FUEL USAGE

Source	Gallons of Diesel Fuel Per Year	Gallons of Gasoline Fuel Per Year
Los Angeles County (2017) [a]	590,196,078	3,659,000,000
Project Operations [b,c]	258,464	648,669
Existing Operations	19,417	197,809
Net Project Operations	239,047	450,860
Percent of County	0.041%	0.012%

NOTES:
[a] Refer to Table 4.6-3.
[b] Includes diesel fuel required by the on-site emergency generators.
[c] Project operational fuel calculations is based on an operational VMT analysis from the Project's Traffic Study.
SOURCE: ESA 2019

Given that the Project Site is located in an urban area within proximity to transit such that vehicle trips and VMT would be minimized, the Project would be consistent with and support the goals and benefits of the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which seeks improved access and mobility by placing "destinations closer together, thereby decreasing the time and cost of traveling between them" (SCAG 2016). As discussed above, the Project Site is an infill location close to jobs, housing, shopping and restaurant uses, and in close proximity to existing public transit stops, which would result in reduced VMT, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops. The Project would support alternative transportation and reducing VMT growth by locating healthcare uses close to existing transit (including the extensive bus services and access to the Expo Rail Line).

The number of destinations available for non-motorized trips within the Mid-City District shows that the existing infrastructure and built environment is sufficiently developed such that projects located in the area would be expected to achieve substantial and credible reductions in trip distances and overall VMT. The density of commercial uses, housing, restaurants, shopping, and recreation amenities in the Mid-City District, combined with the nearby Broadway bike lanes, pedestrian paths and public transportation options in the area, supports the expectation that the Project would have a substantially greater level of transportation efficiency when compared to the Citywide and statewide averages. The Project would therefore be consistent with the SCAG 2016 RTP/SCS goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce vehicular demand and associated emissions (refer to Section 4.8, *Greenhouse Gas Emissions*, for a detailed discussion regarding the Project's VMT reducing land use characteristics and consistency with the SCAG 2016 RTP/SCS). As such, the Project would be consistent with regional plans to reduce VMT and would not cause wasteful, inefficient, or unnecessary use of energy.

As stated in PDF-AQ-2, the Project would provide for the installation of electric vehicle charging stations within all Phase II Project facilities with more than 50 parking spaces. The total number of electric vehicle charging stations would be determined as part of the Development Agreement to be finalized; however, the Project would be required to provide at least two electric vehicle charging stations plus one for each additional 50 parking spaces consistent with SMMC Section 9.28160(B)(2). As a result, the Project would support Statewide efforts to improve transportation energy efficiency and reduce wasteful or inefficient transportation energy consumption with respect to private automobiles. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be purchased or utilized by residents and visitors to the Project Site, has the potential to reduce the Project's consumption of gasoline and diesel; however, the effect may be minimal in the current vehicle market. According to EMFAC2014, electric vehicles are predicted to account for approximately 8.1 percent of the vehicle fleet total in 2041 in the region, which would result in a small amount of fuel savings.

Conclusion Regarding Operation and Maintenance Energy Consumption

Operation of the Project would result in energy usage from building energy demand and transportation-related energy associated with vehicles traveling to and from the Project Site. The amount of energy used would not represent a substantial fraction of the available energy supply in terms of building energy or transportation fuels and would not increase the need for new energy infrastructure. The Project Site is located in a transit-rich area such that vehicle trips and VMT would be minimized and the Project would be consistent with and support the goals and benefits of the SCAG 2016 RTP/SCS, which seeks improved access and mobility. Furthermore, the Project would incorporate green building measures consistent with the City's Energy Code, exceeding the energy efficiency standards in CALGreen. The Project would also provide opportunities for improved energy efficiency exceeding regulatory standards by installing solar electric PV systems and providing capacity for electric vehicle recharging. As the Project would achieve greater than required energy efficiency, it would not result in the wasteful, inefficient, and unnecessary consumption of building energy or transportation energy usage. Therefore, operation of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not

increase the need for new energy infrastructure or preempt opportunities for future energy conservation. Therefore, operational energy impacts would be less than significant.

Consistency with Energy Plans

Impact Energy-2: *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Impact Statement ENERGY-2: The Project would include a number of sustainable energy efficiency features to support the use of renewable energy and energy efficiency goals. The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

As discussed above, the Project would incorporate green building design features such as solar electric PV systems and electric vehicle charging parking spaces, consistent with the energy efficiency standards in the City's Green Building Code and CALGreen Code. As required by the City's Energy Code, the Project would be designed to consume at least 10 percent less energy than required by the California Energy Code (or whatever City standards that are applicable at the time of building permit issuance).

The Project would install electric vehicle charging spaces, as well as dedicate five percent of non-residential parking spaces to electric vehicles. The Project would install long-term and short-term parking, which have the potential to reduce fuel consumption, as well as criteria pollutant and GHG emissions. The Project would also provide showers and clothes lockers for employees which has the potential to reduce secondary trips. The Project would be consistent with the City's Transportation Demand Ordinance as discussed in Section 4.17, *Transportation,* of this Draft EIR. The Project would implement measures to meet the City's target average vehicle ridership (AVR). The following measure would include: a TDM Coordinator; Area wide Transportation Management Association (TMO); transit pass subsidy; ridesharing (carpools and vanpools); parking pricing; Guaranteed Ride Home (GRH); bicycle facilities; car share service; bicycle sharing areas; transportation information center and TDM website information; pedestrian wayfinding signage; and commuter club. The Project would incorporate Project Design Features (refer to PDF-AQ-1 in Section 4.2, *Air Quality*, of this EIR) that provide opportunities for improved energy efficiency that would exceed the regulatory standards. Overall the Project's features would support and promote the use of renewable energy and energy efficiency, therefore, the Project impacts would be less than significant.

4.6.4.5 Cumulative Impacts

Cumulative development inclusive of the Project would also contribute to impacts on energy resources from the SCE and SoCalGas, as well as regional fuel consumption due to increased vehicle miles traveled. Cumulative development for under construction, approved and pending cumulative projects within the City is identified in Chapter 3, *General Description of the Environmental Setting*, in Table 3-1.

Consumption of Energy

Electricity

The geographic context for the cumulative analysis of electricity is SCE's service area. Growth within this service area is anticipated to increase the demand for electricity and the need for infrastructure, such as new or expanded facilities.

Buildout of the Project, cumulative projects, and additional growth forecasted to occur in the City would increase electricity consumption during Project construction and operation, and may cumulatively increase the need for energy supplies. However, as discussed previously, the Project as well as cumulative projects in the City would be required to comply with the City's Green Building Code and Energy Code. As such, cumulative projects would also be required to be more energy efficient than the California Energy Code, and would be required to install photovoltaic systems. Additionally, Santa Monica receives electricity from the CPA and therefore, the Project and cumulative projects would consume electricity that is generated by 100 percent renewable energy sources. Based on this, the Project would not have an impact on nonrenewable energy resources or SCE's electric generation capacity or distribution capabilities. Accordingly, the impacts related to electricity consumption would not be cumulatively considerable, and thus would be less than significant.

Natural Gas

The geographic context for the cumulative analysis of natural gas is the SoCalGas service area. While growth within this geographic region is anticipated to increase the demand for new natural gas hookups and meters, efficiency upgrades and the transition away from natural gas as a source of energy generation is expected to decrease the overall natural gas demand in future years.

Though electricity usage is predicted to rise, natural gas demand is expected to decline overall from 2016-2035 accounting for population and economic growth as well as efficiency improvements and the State's transition away from fossil fuel-generated electricity to increased renewable energy. SoCalGas predicts a decline in every sector (residential, industrial, commercial, electricity generation, and vehicular), with the exception of wholesale and international gas sales to Mexico. The 2016 California Gas Report states, "SoCalGas projects total gas demand to decline at an annual rate of 0.6% from 2016 to 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI)." (California Gas and Electric Utilities 2016)

Buildout of the Project and cumulative projects in the SoCalGas service area is expected to increase short term natural gas consumption and the need for natural gas supplies, but long-term energy efficiency upgrades are expected to reduce the energy impacts of both the Project and related projects over the next 20 years. According to SoCalGas data, natural gas sales have been relatively stable over the past three years with a slight increase from 287 billion cubic feet in 2014 and 294 billion cubic feet in 2016. Based on the Project's estimated natural gas consumption as shown in Table 4.6-7, the Project would account for approximately 0.016 percent of SoCalGas for the Project's buildout year.

Although future development projects would result in use of nonrenewable natural gas resources which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with regional and local growth expectations for SoCalGas's service area. Further, like the Project, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards in Title 24, and incorporate mitigation measures, as necessary. While initially the Project and cumulative projects could result in increased natural gas demand compared to existing uses on each specific project site, the overall demand for natural gas over time is expected to decline due to increases in regional natural gas efficiencies and the transition to renewable energy on a statewide basis displacing fossil fuels including natural gas. Therefore, the Project would not have a cumulatively considerable impact related to natural gas consumption, and impacts would be less than significant.

Transportation Energy

Buildout of the Project and cumulative projects in the region would be expected to increase overall VMT; however, the effect on transportation fuel demand would be minimized by future improvements to vehicle fuel economy pursuant to federal and state regulations. By 2025, vehicles will be required to achieve 54.5 mpg (based on USEPA measurements), which is a 54 percent increase from the 35.5 mpg standard in the 2012-2016 standards. As discussed previously, the Project would support statewide efforts to improve transportation energy efficiency and would co-locate healthcare uses near major transit facilities, including the Expo light rail station at 17th Street/SMC. Siting land use development projects at infill sites is consistent with the State's overall goals to reduce VMT pursuant to SB 375, and as outline in the SCAG 2016 RTP/SCS for the region, which seeks improved access and mobility by placing "destinations closer together, thereby decreasing the time and cost of traveling between them" (SCAG, 2016). Related projects that would also be consistent with these goals and would also contribute to transportation energy efficiency. Furthermore, according to the USEIA's International Energy Outlook 2016, the global supply of crude oil, other liquid hydrocarbons, and biofuels is expected to be adequate to meet the world's demand for liquid fuels through 2040 (EIA, 2016). Therefore, as the Project would incorporate land use characteristics consistent with state goals for reducing VMT, the Project would not have a cumulatively considerable impact related to transportation energy, and impacts would be less than significant.

4.6.5 Mitigation Measures

The Project would not have a significant impact on the environment due to energy consumption. Therefore, impacts would be less than significant. No mitigation is required.

4.6.6 Level of Significance After Mitigation

Impacts are less than significant; no mitigation measures are required.

4.7 Geology and Soils

4.7.1 Introduction

This section evaluates potential geology and soils hazards that could occur with development of the Project including faulting/ground rupture, seismic hazards, soil stability (soft/compressible soils, liquefaction, expansive soils, bedrock and/or other obstructions), and potential shallow groundwater and caving soils. The geologic analysis is based on a Report of Preliminary Geotechnical Consultation (Preliminary Geotechnical Report) prepared for the Project by Wood Environment & Infrastructure Solutions Inc. in June 2018 and included as Appendix E of this Draft EIR. Other sources of information include the Safety Element of the City of Santa Monica General Plan, City of Santa Monica Geologic Hazards Map, and the California Geological Survey (CGS).

This section also evaluates potential impacts to paleontological resources and unique geologic features. The analysis of paleontological resources is based on a Paleontological Resources Technical Report prepared for the Project by ESA in September 2018 and included as Appendix F of this EIR.

4.7.2 Environmental Setting

4.7.2.1 Project Site

The Project Site (Phase II Development Sites) totals approximately 407,100 square feet (sf) within the greater PSJHC Campus. The Project Site includes contains existing buildings associated with PSJHC [including the John Wayne Cancer Institute (JWCI), Child & Family Development Center (CFDC), Saint John's Foundation Building (SJF)], two temporary MRI modular trailers, a vacant 10-unit apartment building, and several surface parking lots.

The ground surface of the Project Site and greater PSJHC Campus generally slopes down from north to south, with an approximately 10-foot elevation differential across the Project Site. The Project Site is almost completely covered in impervious surfaces, except for Mullin Plaza which, in addition to a semi-circular driveway and pick-up/drop-off area for the Hospital, includes large areas of landscaping around the central concrete plaza.

The CEQA Guidelines do not define "unique geologic features". Therefore, for purposes of this analysis, unique geologic features are defined as cliffs, rock outcroppings, large boulders, and other vertical geologic formations excluding hillsides and banks. The Project Site is currently fully graded and developed with urban uses, and no unique geologic features are currently present at the Project Site.

4.7.2.2 Regional Geotechnical Context

The City of Santa Monica (City) is located just south of the boundary between the Transverse Ranges and Peninsular Ranges geomorphic provinces. The Transverse Ranges geomorphic province to the north is characterized by east-west trending mountain ranges that include the Santa Monica Mountains. The Santa Monica, Hollywood, Raymond, Sierra Madre, and Cucamonga faults mark the southern boundary of the province. The Peninsular Range province is characterized by northwest/southeast trending alignments of mountains and hills and intervening basins,

reflecting the influence of northwest trending major faults and folds controlling the general geologic structural fabric of the region. This province extends northwesterly from Baja California into the Los Angeles Basin and westerly into the offshore area, including Santa Catalina, Santa Barbara, San Clemente and San Nicolas islands, and is bounded on the east by the San Jacinto fault zone. The Los Angeles Basin is the northernmost part of the Peninsular Ranges province.

The Project Site and greater PSJHC Campus are located on the Santa Monica plain near the northwest margin of the Los Angeles basin and about 3 miles south of the Santa Monica Mountains. The Santa Monica plain is a Pleistocene age surface that has been uplifted, dissected by erosion, and locally infilled with Holocene age alluvial deposits.

4.7.2.3 Groundwater

The Coastal Plain of the Los Angeles Basin is sub-divided into several distinct groundwater basins. These groundwater basins are caused by geologic features such as non-water bearing bedrock, faults, and other features that impede the flow of groundwater such as folds and groundwater mounds. The City is underlain by the Santa Monica sub-basin of the Los Angeles groundwater basin. Groundwater within the Santa Monica sub-basin occurs in all of its deposits from the recent alluvium down to the fractured Tertiary sediments, with the movement of groundwater in the sub-basin generally towards the south with some minor subsurface flow towards the west.

According to the Preliminary Geotechnical Report prepared for the Project, north of Santa Monica Boulevard, local seepage was encountered within two borings within or near the Project Site at various depths between 22 and 57 feet below the ground surface (bgs). Groundwater depths ranged between 110 and 115 feet bgs both north and south of Santa Monica Boulevard. The historic-high groundwater level is reported to be deeper than 40 feet below the ground surface at the site. (California Division of Mines and Geology, 1998)

4.7.2.4 Soils

Fill soils, up to 5 feet thick were encountered in prior borings near the Project Site north of Santa Monica Boulevard, while fill soils up to 6 feet thick were encountered in the borings at the Project Site of Santa Monica Boulevard. The fill soils consist of clayey silt, sandy silt, silty clay, silty sand, and sand with some gravel and concrete and brick fragments and are not uniformly well compacted. Deeper fill could occur between in unexplored areas, particularly in areas where existing buildings, utilities, vaults, or underground tanks are present.

The natural geologic materials at the Project Site consist of Late to Middle Pleistocene age alluvial fan and marine deposits including silt, clay, silty sand, and sand. Varying amounts of gravel and some cobbles were also encountered throughout the depths explored. The natural soils are generally stiff and dense; however, there are some layers of medium stiff silt and clay and medium dense silty sand between depths of 10 and 35 feet. The upper silty soils in some areas are susceptible to hydroconsolidation and will become weaker and more compressible when wet. The upper clayey soils in some areas are slightly expansive.

According to the Preliminary Geotechnical Report, prior corrosion studies indicate that the soils on the Project Site are corrosive to ferrous metals, aggressive to copper, and that the potential for sulfate attack on portland cement concrete is considered negligible.

4.7.2.5 Geologic Hazards

Earthquake Faults

The numerous faults in Southern California include active, potentially active, and inactive faults. The criteria for these major groups are based on criteria developed by the California Geological Survey (CGS, previously the California Division of Mines and Geology) for the Alquist-Priolo Earthquake Fault Zoning Program. By definition, an active fault is one that has had surface displacement within Holocene time (about the last 11,700 years). A potentially active fault is a fault that has demonstrated surface displacement of Quaternary age deposits (last 1.6 million years). Inactive faults have not moved in the last 1.6 million years. A list of the 31 active faults within 60 miles of the Project Site, the distance between the Project Site and the nearest point along these faults, the direction of these faults from the Project Site, and the maximum magnitude and slip rate associated with each of these faults, is identified in **Table 4.7-1**, *Active Faults*. A map showing the locations of these faults is included as **Figure 4.7-1**, *Regional Faults and Seismicity*. As indicated therein, the four active faults nearest the Project Site include the Compton Blind Thrust, Santa Monica, Malibu, and Hollywood Faults, each of which is described below:

- Compton Blind Thrust Fault: Several buried thrust faults, commonly referred to as blind thrusts, underlie the Los Angeles Basin at depth. These faults are not exposed at the ground surface, are typically identified at depths greater than 3 kilometers, and do not present a potential surface fault rupture hazard, but are considered potential sources for future earthquakes. The Compton blind thrust has been defined from seismic reflection profiles and borehole data as a northeast-dipping structure extending approximately 45 kilometers from southwest Los Angeles County to northern Orange County in a southeastern direction. Blind faulting is correlated at depth to near-surface folding, and several uplift events associated with this fault have been interpreted by investigating deformed Holocene layers along buried fold scarps. The cumulative uplift from the observed events ranged from 0.6 to 1.9 meters or approximately 1.3 to 4.2 meters of thrust displacement. Slip rate is estimated to be 0.9 mm/yr (Field et al., 2013). The Compton Thrust fault underlies the site at depth, however this thrust fault is not exposed at the surface and does not present a potential surface fault rupture hazard.

- Santa Monica Fault: The Santa Monica and Hollywood fault zone form a portion of the Transverse Ranges Southern Boundary (TRSB) fault system. The TRSB fault system also includes the Malibu-Coast fault to the west of the Santa Monica fault and the Raymond and Cucamonga faults to the east of the Hollywood fault. The Santa Monica fault zone (SMFZ) is the western segment of the Santa Monica-Hollywood fault zone. The fault zone trends east-west from the Santa Monica coastline on the west to the Hollywood area on the east. Urbanization and development within the greater Los Angeles area has resulted in a poor understanding of the lateral extent, location, and rupture history of the SMFZ. However, the surface expression of the SMFZ includes fault-related geomorphic features, offset stratigraphy, and groundwater barriers within late Quaternary deposits.

  The two branch Santa Monica Fault runs roughly from east to west through the northern portion of the City, extending offshore where it links to the Malibu Coast fault. As indicated in **Figure 4.7-2**, *Geologic Hazards,* the northern branch of the Santa Monica Fault is located over 1,300 feet north of the Project Site, is active, and while an Alquist-Priolo Earthquake Fault Zone has been designated around this branch, the Project Site is not located within this zone (discussed further under "Surface Rupture" below).

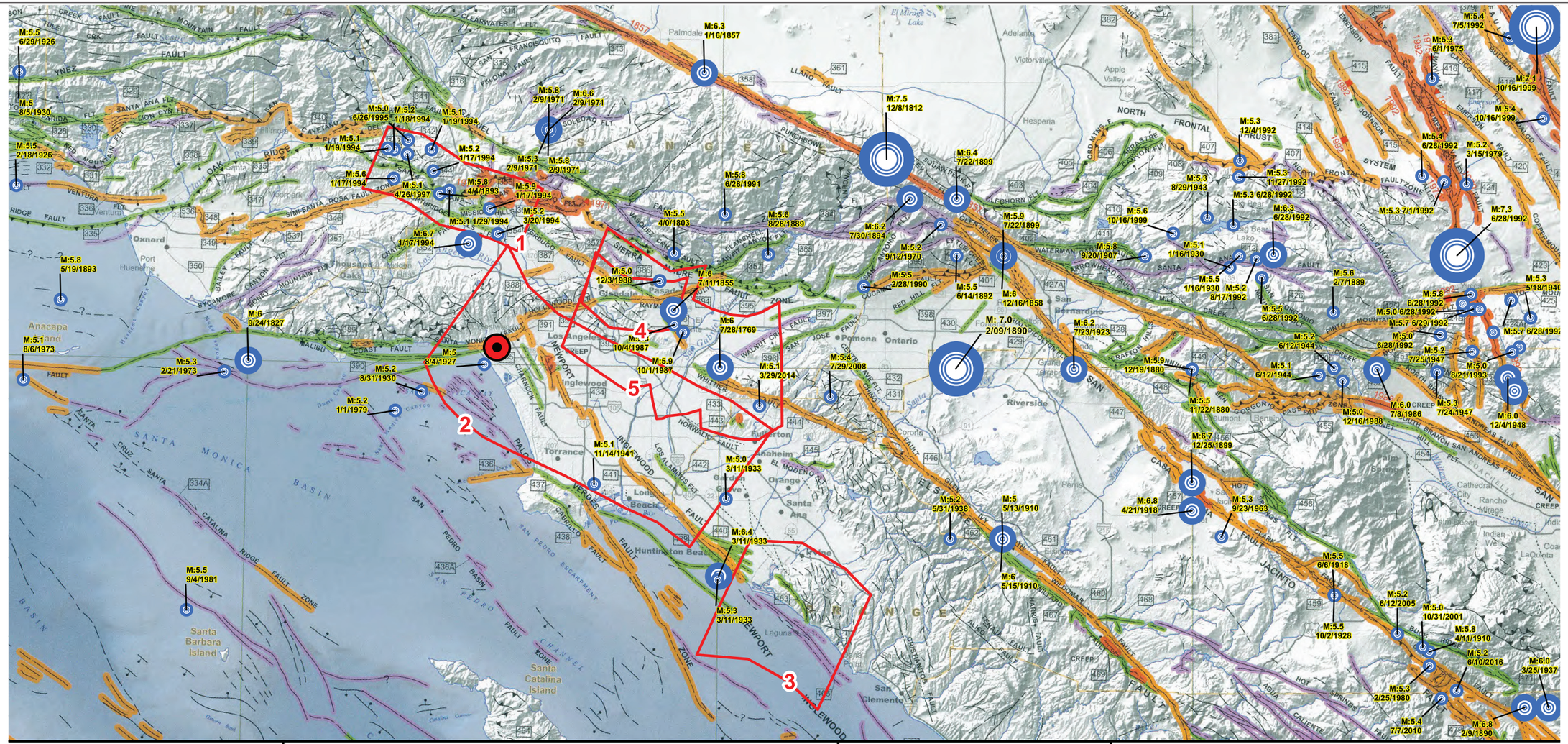
TABLE 4.7-1
ACTIVE FAULTS

Fault	Distance from Site	Direction from Site	Fault Type	Maximum Magnitude	Slip Rate (mm/yr.)
Compton Thrust	0[a]	NA	BT	7.1	0.9
Santa Monica (North Branch)	0.8	N	RO	6.6	1.0
Malibu Coast	3.1	WNW	RO	6.7	0.3
Hollywood	4.8	NE	RO	6.4	1.0
Palos Verdes	4.9	SW	SS	7.3	3.0
Northridge Thrust	7.8	N	BT	7.0	1.5
Puente Hills Blind Thrust	9.0	E	BT	7.1	0.7
Upper Elysian Park Thrust	10	ENE	BT	6.4	1.3
Anacapa-Dume	12	W	RO	7.5	3.0
Verdugo	14	NE	RO	6.9	0.5
Raymond	15	ENE	RO	6.5	1.5
Sierra Madre (San Fernando)	17	N	RO	6.7	2.0
Santa Susana	19	N	RO	6.7	5.0
Sierra Madre	19	NE	RO	7.2	2.0
San Gabriel	21	NNE	SS	7.2	1.0
Simi-Santa Rosa	22	NNW	RO	7.0	1.0
Whittier	26	ESE	RO	6.8	2.5
Holser	27	N	RO	6.5	0.4
Clamshell-Sawpit	28	ENE	RO	6.5	0.5
Oak Ridge	29	NNW	RO	7.0	4.0
San Cayetano	32	NNW	RO	7.0	6.0
San Jose	34	E	RO	6.4	0.5
San Joaquin Thrust	40	SE	BT	6.6	0.5
San Andreas (Mojave S. Section)	41	NE	SS	7.4	29.0
Chino-Central Avenue	43	E	RO	6.7	1.0
Cucamonga	45	E	RO	6.9	5.0
Elsinore (Glen Ivy Section)	48	ESE	SS	6.8	5.0
San Jacinto (SB Section)	55	ENE	SS	6.7	6.0
Santa Ynez	55	NW	SS	7.1	2.0
San Andreas (SB N. Section)	59	ENE	SS	7.5	22.0
Santa Cruz Island	59	W	RO	7.0	1.0

Fault Type: SS = strike slip; NO = normal oblique; RO = reverse oblique; BT = blind thrust

[a] At depth – does not come to surface.

SOURCE: Wood Environment & Infrastructure Solutions Inc., Report of Preliminary Geotechnical Consultation – Proposed Master Planning Study – Providence Saint John's Health Center Phase II Project, 2125 Santa Monica Boulevard, Santa Monica, California, June 15, 2018.



Earthquakes

Approximate Epicentral Area of Earthquake

- Events ≥ 7.0
- Events 6.0 - 6.9
- Events 5.0 - 5.9

Faults

- Historic Fault Displacement
- Holocene Fault Displacement
- Evidence of Late Quaternary Fault Displacement
- Undifferentiated Quaternary Faults

Bar and ball on downthrown side (relative or apparent)

Arrows along fault indicate relative or apparent direction of lateral movement

Arrows on fault indicates direction of dip

Low angle fault with barbs on upper plate. Fault surface generally dips less than 45 but locally may have been subsequently steepened.

Blind Thrust Faults (surface projection)

Blind Thrust Index:

1 Northridge Thrust

2 Compton Thrust

3 San Joaquin Hills Thrust

4 Upper Elysian Park Thrust

5 Puente Hills Thrust

SITE

N W E S

0 4 8 16 24 32 Kilometers

0 3 6 12 18 24 Miles

REFERENCES:

Jennings, C.W. and Bryant, W.A., 2010,"Fault Activity Map of California," California Geological Survey, GDM-006, May 2010

Earthquake Catalogs: California Geological Survey, 1769-1932; Southern California Earthquake Center, 1932-2018.

Working Group on California Earthquake Probabilities (WGCEP), 2016, Fault Database Tools, <http://www.wgcep.org/tools-fault_db>

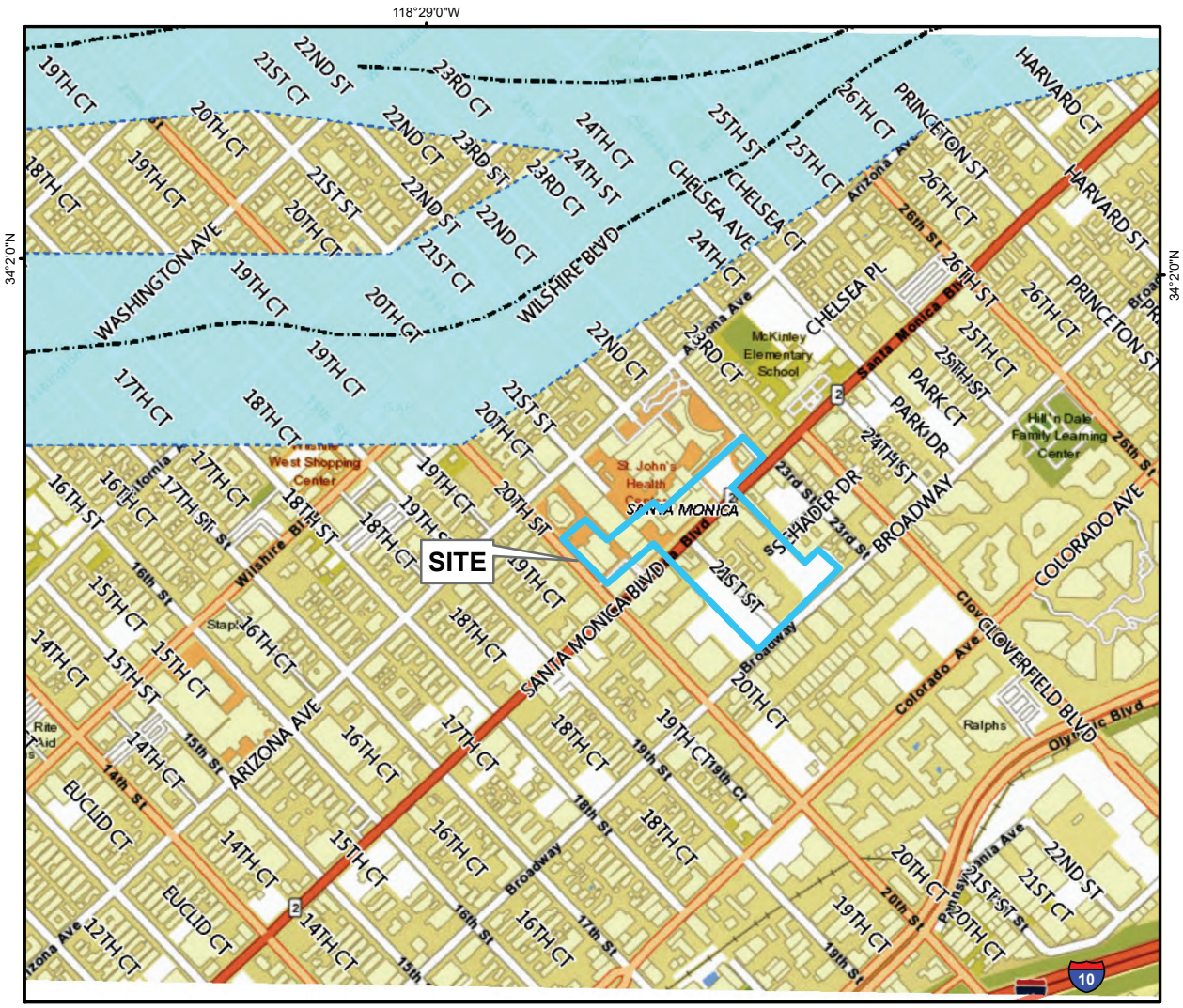
D170258.00

SOURCE: Wood Environment & Infrastructure Solutions Inc., Report of Preliminary Geotechnical Consultation – Proposed Master Planning Study – Providence Saint John's Health Center Phase II Project, 2125 Santa Monica Boulevard, Santa Monica, California, November 14, 2014June 15, 2018

Providence Saint John's Health Center Phase II Project

Figure 4-7.1
Regional Faults and Seismicity

ESA



GEOLOGIC HAZARDS

Fault Zones (2018 Update)

- Fault Traces
- City of Santa Monica Fault Zone

N
W E
S

0 400 800 1,600 Feet

0 0.075 0.15 0.3 Miles

Reference:
City of Santa Monica, 2018, Information Systems, Santa Monica Mapping Application Platform, accessed April 19, 2018, <https://www.smgov.net/Departments/ISD/content.aspx?id=15297>

D170258.00

SOURCE: Wood Environment & Infrastructure Solutions Inc., Report of Preliminary Geotechnical Consultation – Proposed Master Planning Study – Providence Saint John's Health Center Phase II Project, 2125 Santa Monica Boulevard, Santa Monica, California, June 15, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.7-2
Seismic Hazards Map

ESA

- Malibu Fault: The active Malibu Coast fault zone is located approximately 3.1 miles west-northwest of the Project Site and is an east-west trending, north-dipping reverse fault extending westward from Santa Monica to offshore of Point Mugu. Fault trenching conducted in 1985 and 1986 on south Winter Mesa in the Malibu area of Los Angeles County exposed several faults disrupting Tertiary and Pleistocene units, and one fault offsetting colluvial deposits estimated to be 6,000 years old. The observed faults, named the Winter Mesa faults, are believed to be splays of the Malibu Coast fault; accordingly, the Holocene faulting on the Winter Mesa faults is considered representative of active faulting along the Malibu Coast fault zone.
- Hollywood Fault: The Hollywood fault trends approximately east-west along the base of the Santa Monica Mountains from the West Hollywood-Beverly Hills area to the Los Feliz area of Los Angeles. The fault is a ground-water barrier within Holocene sediments. Studies by several investigators have indicated that the fault is active, based on geomorphic evidence, stratigraphic correlation between exploratory borings, and fault trenching studies. The Hollywood fault zone has been included in the Earthquake Zones of Investigation by the CGS. The closest distance to the Hollywood fault from the Project Site is approximately 4.8 miles.

Fault Rupture

Fault rupture (e.g., surface rupture resulting from seismic activity) involves the displacement and cracking of the ground surface along a fault trace. Fault ruptures are visible instances of horizontal and/or vertical displacement, and are typically confined to a narrow zone along the fault. Fault rupture is more likely to occur in conjunction with active fault segments where earthquakes are large, or where the location of the movement (earthquake hypocenter) is shallow.

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 regulates development near active faults to mitigate the hazard of surface fault rupture. The Act requires the State Geologist to establish regulatory zones (known as Alquist-Priolo Special Study Fault Zones) around the surface traces of active faults and to issue appropriate maps. Local agencies must regulate most development projects within the zones. Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults. An evaluation and written report of a specific site must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault. As indicated in Figure 4.7-2, the closest trace of the north branch Santa Monica Fault is located over 1,300 north of the Project Site, and the closest edge of the associated Alquist-Priolo Zone over 1,000 feet from the Project Site.

Based on the available geologic data and recent fault surface rupture investigation, active faults with the potential for surface fault rupture are not known to be located beneath or projecting toward the Project Site. Thus, the potential for surface rupture at the site due to fault plane displacement propagating to the ground surface during the design life of the Project is considered low.

Seismic Ground Shaking

Earthquake magnitudes are quantified using the Richter scale, which is a logarithmic scale whereby each whole number increase in Richter magnitude represents a tenfold increase in the amplitude of the seismic wave generated by an earthquake. For example, at the same distance from a fault, the shaking during a magnitude 5.0 earthquake will be 10 times larger than a magnitude 4.0 earthquake

while the amount of energy released would increase by a factor of 32. Earthquakes of Richter magnitude 6.0 to 6.9 are classified as moderate, those between 7.0 and 7.9 are classified as major, and those of 8.0 or more are classified as great.

Historically, the City has experienced seismic activity from various regional faults. The strongest, most recent regional seismic event was the January 1994 Northridge earthquake (magnitude 6.8). The epicenter of this event was approximately 12 miles northeast of the City in Northridge. The City experienced extensive damage from the Northridge Earthquake, resulting in eventual demolition of many damaged buildings. The October 1987 Whittier Narrows earthquake was centered beneath the Elysian Park/Montebello Hills area of Los Angeles County. As with the Northridge earthquake, no surface fault ruptures were observed. (City of Santa Monica 2010a)

The Project Site could be subjected to strong seismic ground shaking during an earthquake, such as an event on the Santa Monica fault located approximately 1,300 feet north of the Site. The peak ground acceleration at the Project Site during the Maximum Considered Earthquake (MCE) is an estimated 0.8g. The Preliminary Geotechnical Report indicates that this level of ground acceleration is common in Southern California and that the associated effects can be mitigated by proper engineering design and construction in conformance with current building codes and engineering practices.

Liquefaction

Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction is defined as the transformation of a granular material from a solid state into a liquefied state as a consequence of increased pore pressure, which results in the loss of grain-to-grain contact. Unconsolidated silts, sands, and silty sands are most susceptible to liquefaction. Almost any saturated granular soil can induce an increase in pore water pressures when shaken, and subsequently, these excess pore water pressures can lead to liquefaction if the intensity and duration of earthquake shaking are great enough. Liquefaction potential is greatest where the ground-water level is shallow, and submerged loose, fine sands occur within a depth of about 50 feet or less. Liquefaction potential decreases as grain size and clay and gravel content increase. As ground acceleration and shaking duration increase during an earthquake, liquefaction potential increases.

Localized seepage was encountered in borings between the depths of 22 and 57 feet bgs in the northeastern portion of the PSJHC Campus (north of Santa Monica Boulevard)., while groundwater (e.g., the apparent water table) was encountered at this and other portions of the PSJHC Campus at depths between 110 and 115 feet bgs. The historic high groundwater level is estimated to be deeper than 40 feet below the ground surface at the Project Site (California Division of Mines and Geology 1998.) The results of the borings indicate that the soils below the historic-high groundwater level are generally dense and stiff. Furthermore, the Project Site is not located in either a State of California (California Division of Mines and Geology or 1999) or City (see Figure 4.7-2) designated Liquefaction Hazard Zone. Therefore, the Preliminary Geotechnical Report concludes that the liquefaction potential at the Project Site is low.

Lateral Spreading

Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The potential for lateral spreading on the Project Site is low because the liquefaction potential is low.

Landslides and Slope Instability

The stability of slopes is affected by a number of factors including slope, rock and soil type, and the amounts of water and vegetation present. Events that can cause a slope to fail include sudden movements such as those during a seismic event, modification of the slope by nature or humans, undercutting caused by erosion, and changes in hydrologic characteristics, including heavy rains that can saturate the soil.

The main areas of landslide concern within the City are confined to the Palisades bluffs above the Pacific Coast Highway, at the southwestern edge of the City, and do not include the Project Site. Furthermore, according to the Preliminary Geotechnical Report, the topography of the Project Site and surrounding is relatively flat which precludes stability problems, the Project Site is neither near or within the path of known or potential landslides, and the Project Site is not located within an area of potential seismic slope instability according to the CGS. Therefore, the Preliminary Geotechnical Investigation indicates that the Project Site is not susceptible to landslides and slope instability, although the report indicates that, due to the alluvial and marine deposits at the Project Site, excavations could be prone to reveling and caving without temporary shoring of vertical excavation faces.

Expansive Soils

Expansive soils tend to swell with seasonal increases in soil moisture in the winter months and shrink as soils become drier in the summer months. Repeated shrinking and swelling of the soil can lead to stress and damage of structures, foundations, fill slopes and other associated facilities. Expansive soils owe their characteristics to the presence of swelling clay minerals. Criteria for defining expansive soils are described in Section 1803.5.3 of the CBC.

According to the Preliminary Geotechnical Report, the upper clayey soils in some areas of the Project Site are slightly expansive.

Subsidence

Subsidence is the downward shift of the ground surface relative to a datum, such as sea level. Subsidence may be caused by mineral dissolution, earth extraction activities, geological faulting, seasonal effects that cause changes in soil moisture content, or the withdrawal of pressurized fluids (e.g., groundwater, oil) or gas from subsurface aquifers. According to Preliminary Geotechnical Report, the Project Site is not located within an oil filed or within an area of known subsidence associated with fluid withdrawal (groundwater or petroleum), peak oxidation, or hydrocompaction, and that the potential for on-site subsidence is low.

Differential Settlement (including Collapse)

Differential settlement is the process whereby soils settle non-uniformly, potentially resulting in stress and damage to utility pipelines, building foundations, or other overlying structures. Such movement can occur during seismic events and in the absence of seismic events due to improper grading and soil compaction or discontinuity of underlying fill and naturally occurring soils. Collapse is a phenomenon where the soils undergo a significant decrease in volume upon increase in moisture content, with or without an increase in external loads. Buildings, structures and other improvements may be subject to excessive settlement-related distress when collapsible soils are present. According to the Preliminary Geotechnical Report, due to the types of soils, lack of groundwater close to the surface, and seismic conditions at the Project Site, potential seismically-induced settlement (including collapse) at the Project Site is not anticipated to exceed ½ inch, although the extent of any settlement is based, in part, on excavation depths.

Seiches and Tsunamis

Earthquakes can create seiches which are seismically-induced water oscillations in lakes and reservations, and tsunamis which are seismically-induced oceanic waves. There are no lakes or reservoirs within the vicinity of the Project Site. Furthermore, the Project Site is approximately 1.60 miles from the Pacific Ocean at an elevation of approximately 150 ft above mean sea level (msl), and the CGS's Tsunami Inundation Map indicates that the Project Site is located well outside the State's designated tsunami area (CGS 2009). Therefore, the Preliminary Geotechnical Report concludes that the potential for seiches and tsunamis at the Project Site is low.

Erosion Susceptibility

Erosion of exposed soils and rocks occurs naturally as a result of physical weathering caused by water and wind action. The Project Site is located in a relatively flat urbanized area surrounded on all sides by urban development, and are themselves fully developed. Therefore, the Project Site is not currently subject to erosion, and as long as future development occurs in accordance with applicable regulations during construction and operation, the erosion potential of the Project Site is considered low.

4.7.2.6 Paleontological Resources

Paleontology is a branch of geology that studies the life forms of the past, especially prehistoric life forms, through the study of plant and animal fossils. Paleontological resources represent a limited, non-renewable, and impact-sensitive scientific and educational resource. As defined in this section, paleontological resources are the fossilized remains or traces of multi-cellular invertebrate and vertebrate animals and multi-cellular plants, including their imprints from a previous geologic period. Fossil remains such as bones, teeth, shells, and leaves are found in the geologic deposits (rock formations) where they were originally buried. Paleontological resources include not only the actual fossil remains, but also the fossil localities, and the geologic formations containing those localities.

The Los Angeles Basin, which is an alluviated lowland sometimes referred to as the coastal plain, is underlain by a structural depression that is important for its structural relief and complexity in relation to its small size and for its abundant oil production. The basin was formed about 15 million

years ago during the Neogene, when the land was underwater and during a crustal disruption caused by a clockwise shift in the surrounding mountains. This weakening led to the formation of a large bowl of the basin and sediment from the sea and rivers accumulated in thick layers in the undersea bowl. Then, about 5 million years ago, the crustal stretching collapsed and the basin was forced to the surface (Yerkes et al., 1965).

The Project Site is located at the western-most edge of the Los Angeles Basin. The Los Angeles Basin forms a significant structural depression between the Transverse Ranges geomorphic province to the north and the Peninsular Ranges province to the south (Norris and Webb, 1990). Thousands of feet of sediment have been intermittently deposited into the basin since the Late Cretaceous, with continual settling and deposition taking place since the Miocene. In the central region of the basin, the geologic makeup consists of Mesozoic basement of igneous and metamorphic origin unconformably overlain by thousands of feet of clastic terrestrial and marine sedimentary rocks ranging in age from the Late Cretaceous to the Pleistocene with interbedded volcanic horizons of Miocene age (Yerkes et al., 1965).

A paleontological resources records search was conducted by the Natural History Museum of Los Angeles County (LACM) on June 8, 2017 (McLeod, 2017). The database search results indicate that surface deposits in the Project Site's eastern portion consist of younger Quaternary alluvium, and surface deposits in the Project Site's western portion consist of older Quaternary alluvium, both derived broadly as alluvial fan deposits from the Santa Monica Mountains to the north. The younger Quaternary deposits typically do not contain significant vertebrate fossils in the uppermost layers, but may contain significant fossil vertebrate remains at relatively shallow depths. The LACM records search returned no known localities within the Project Site; however, a number of vertebrate fossils are known from similar sedimentary deposits within the Project Site vicinity (McLeod, 2017). The closest locality from older Quaternary sediments is LACM 5462, located approximately 0.5 mile from the Project Site. This locality produced a specimen of extinct lion, *Felix atrox*, at a depth of 6 feet below ground surface. Fossil locality LACM 7879, located approximately 1.9 miles from the Project Site, produced fossil specimens of horse, *Equus*, and ground sloth, *Paramylodon*, at depths over 11 feet below ground surface.

4.7.3 Regulatory Framework

4.7.3.1 Federal Regulations

International Building Code

The International Building Code (IBC) is a model building code developed by the International Code Council (ICC). It has been adopted and used as a base code standard throughout most of the United States and serves as the basis for the California Building Code (CBC). It has been adopted by the California Legislature with amendments to address the specific building conditions and structural requirements for California, as well as provide guidance on foundation design and structural engineering for different soil types.

4.7.3.2 State Policies and Regulations

Geology and Soils

State policies and regulations have been developed in California concerning types of development, building standards and locations of seismic hazards. These regulations include:

Alquist-Priolo Earthquake Fault Zoning Act (1972)

The purpose of this Act is to regulate types of development near active faults to mitigate the hazard of fault rupture. Under this Act, the State Geologist is required to delineate earthquake fault zones/Alquist-Priolo Fault Zones along known active faults in California. The Act also requires that geologic studies be conducted to locate and assess any active fault traces in and around known active fault areas prior to development of buildings for human occupancy. Local cities and counties must regulate certain development projects within the Alquist-Priolo Fault Zones, generally by issuing building permits only after geologic investigations demonstrate that Project Site is not threatened by future surface displacement. A buffer prohibiting the construction of structures for human occupancy may be established. Typically, structures for human occupancy are not allowed within 50 feet of the trace of an active fault. As stated above, the nearest Alquist-Priolo Fault Zone is the Santa Monica Fault Zone.

California Building Code (CBC)

The State of California provides minimum standards for building design through the CBC, which is based on the IBC, as modified to account for California's unique geologic conditions. The CBC is selectively adopted by local jurisdictions, based on local conditions. Chapter 16 of the CBC contains specific requirements for seismic safety. Chapter 18 of the CBC regulates excavation, foundations, and retaining walls. Chapter 33 of the CBC contains specific requirements pertaining to site demolition, excavation, and construction to protect people and property from hazards associated with excavation cave-ins and falling debris or construction materials. Appendix J of the CBC regulates grading activities, including drainage and erosion control.

Seismic Hazards Mapping Act

In order to address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act of 1990. Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate "seismic hazard zones." Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of the project area are investigated and appropriate mitigation measures, if any, are incorporated into development plans. The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the Safety Element of their General Plan and encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety. Under Public Resources Code Section 2697, cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard. Each city or county shall submit one copy of each geotechnical report, including mitigation measures, to the State Geologist within 30 days of its approval.

Office of Statewide Health Planning and Development (OSHPD)

OSHPD regulates the design and construction of healthcare facilities to ensure they are safe and constructed in accordance with the California Building Code. Per 2016 CBC, Section 1.10.3, licensed clinics and any freestanding building under a hospital license where outpatient clinical services are provided would be required to comply with OSHPD 3 requirements. Any buildings planned to be used as a "hospital building" as defined in California Health and Safety Code section 129725 and Section 7-111 of Part 1, Chapter 7 of Title 24 of the California Code of Regulations, that building (or buildings) fall under the jurisdiction of OSHPD.

Paleontological Resources

State policies and regulations that address paleontological resources include:

California Environmental Quality Act

Paleontological resources are afforded protection by CEQA. Specifically, Appendix G (part V) of the State CEQA Guidelines provides guidance relative to significant impacts on paleontological resources, stating that "a project will normally result in a significant impact on the environment if it will … directly or indirectly destroy a unique paleontological resource or site or unique geologic feature." The Guidelines do not define "directly or indirectly destroy," but it can be reasonably interpreted as the physical damage, alteration, disturbance, or destruction of a paleontological resource. The Guidelines also do not define the criteria or process to determine whether a paleontological resource is significant or "unique."

Other State Regulations

California Code of Regulations, Title 14, Division 3, Chapter 1, Section 4307 states, part that "no person shall destroy, disturb, mutilate or remove . . . paleontological features." PRC Section 5097.5 protects cultural resources on public lands and specifies that any unauthorized removal of paleontological remains is a misdemeanor. California Penal Code Section 622½ states that damage or removal of archaeological or historical resources (which may be interpreted to include paleontological resources) on public or private lands constitutes a misdemeanor.

4.7.3.3 Local Policies and Regulations

Santa Monica General Plan Safety Element (1995)

The Safety Element includes goals and policies that address the issues of protecting the public from earthquake and landslide hazards and minimizing the economic impact of strong ground motion, liquefaction, and fault rupture on public and private property. The goals and policies guide City procedures for regulating geologic hazards and include the following two policies that address review of individual development projects:

- **Policy 1.2.3**: Through the environmental review process, the City shall encourage special development standards, designs, and construction practices to reduce seismic risks to acceptable levels for projects involving critical facilities, large-scale residential developments, and major commercial or industrial developments.
- **Policy 1.3**: The City shall require geological and geotechnical investigations in areas of potential seismic or geologic hazards as part of the environmental and development review process.

Hospital Area Specific Plan (1988, revised 1993 and 1998)

The Hospital Area Specific Plan (HASP) includes the following geology and soils objectives applicable within the HASP area, including at the Project Site:

- Objective 75: Exposure to geologic hazards shall be minimized.

City of Santa Monica Building Code (Chapter 8.12 of the Santa Monica Municipal Code)

The City's Building Code sets minimum design and construction standards, and establishes certain portions of the city as seismic and geologic hazard zones which require special design requirements for construction. Applicable sections include:

- Section 8.12.020 – Adoption of California Building Code. The City of Santa Monica Building Code sets the minimum design and construction standards for construction. The "California Building Code, 2007 Edition," adopts by reference the International Building Code, 2006 Edition, as published by the California Building Standards Commission and the International Code Council including "Seismic Hazard Maps," as published by the United States Geological Survey. It was adopted with the local amendments and provisions of this Chapter, and with Chapters 8.16, 8.20, and 8.48 through 8.84 of the Santa Monica Municipal Code, and is known as the Building Code of the City of Santa Monica.

- Section 8.12.050 – Supplemental Land Hazard Zone Regulations. The Safety Element established certain portions of the City as Seismic Hazard Zones and Geologic Hazard Zones. These areas and all accompanying information have been incorporated into the Municipal Code as Land Hazard Zones. All construction that is within a Hazard Zone is subject to the special design requirements necessary to affect the stated purpose of these codes. Special design requirements shall conform to the guidelines of the California Department of Conservation, Division of Mines and Geology.

City of Santa Monica Guidelines for Geotechnical Reports

The City implements General Plan Safety Element Policy 1.3 through the City Guidelines for Geotechnical Reports - City of Santa Monica Building and Safety, dated March 2010. (City of Santa Monica 2010b) The guidelines establish standards for data and analysis that must be included in Final Geotechnical Reports, peer review of that data, and demonstration of compliance with applicable CBC regulations and standards for review set forth by the California Geological Survey Special Publication 117 Guidelines for Evaluating and Mitigating Seismic Hazards in California. This includes the identification of specific geotechnical engineering and design recommendations for a proposed project. Before a grading or building permit can be issued for a proposed project, a Final Geotechnical Report must be submitted to the City's Building and Safety Division for review and approval.

4.7.3.4 Other

Society for Vertebrate Paleontology

The Society of Vertebrate Paleontology (SVP) has established guidelines for the identification, assessment, and mitigation of adverse impacts on nonrenewable paleontological resources (SVP,1995). Most practicing paleontologists in the nation adhere closely to the SVP's assessment, mitigation, and monitoring requirements outlined in these guidelines, which were approved through a consensus of professional paleontologists and are the standard. The SVP outlined criteria for screening the paleontological potential of rock units (High, Undetermined, Low) and established assessment and mitigation procedures tailored to such potential.

4.7.4 Environmental Impacts

4.7.4.1 Thresholds of Significance

Appendix G of the State CEQA Guidelines provides questions that address potential impacts related to geological and soil conditions. The CEQA guidelines provides that lead agencies may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects, and the use of Appendix G as a significance threshold is routinely sanctioned by the courts (although such use is not mandatory). These questions are listed below and are used as the significance thresholds by the City in this section:

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:
   - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?
   - ii) Strong seismic ground shaking?
   - iii) Seismic-related ground failure, including liquefaction?
   - iv) Landslides?

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

c) Be located on a geologic unit 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?

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

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

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

Non-applicable Checklist Questions:

Checklist Question (b) erosion: The Project site is located within an urban setting and not located in an area subject to high levels of erosion. The Project Site is currently developed, and is not subject to limited erosion during precipitation events. Furthermore, the Project would develop new buildings and landscaping on the sites and as such, the potential for erosion hazards is low, and question (b) regarding impacts from substantial soil erosion or loss of topsoil does not require further analysis in this section of the EIR. However, potential erosion effects of construction caused by excavation at the Project Site is addressed in Section 4.10, *Hydrology and Water Quality* of this EIR.

Checklist Question (e) septic tanks: Sewer services are available for the disposal of wastewater at the Project Site, and as such, the Project would not require the use of septic tanks or alternative waste water disposal systems. Therefore, Question 5, regarding the capability of soils to support septic systems or alternative waste water disposal systems, does not require consideration of this topic in the analysis below.

With regard to the analysis of impacts related to geology/soils under CEQA, the California Supreme Court ruled in *California Building Industry Assn. v. Bay Area Air Quality Management Dist. (2015) 62 Cal.4th 369*, that "agencies subject to CEQA are not required to analyze the impact of existing environmental conditions on a project's future users or residents. But when a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project's impact on the environment – and not the environment's impact on the project – that compels an evaluation of how future residents or users could be affected by exacerbated conditions."

In fact, the Court found the following sentences of section 15126.2(a) erroneous and unauthorized under CEQA:

> *"[A]n EIR on a subdivision astride an active fault line should identify as a significant effect the seismic hazard to future occupants of the subdivision. The subdivision would have the effect of attracting people to the location and exposing them to the hazards found there."*

Therefore, in accordance with the statutory intent of CEQA and the Court ruling in *CBIA v. BAAQMD*, impacts regarding Geology and Soils would be significant if the Project would:

- **GEO-1:** Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death, involving: (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides.
- **GEO-2:** 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; caused in whole or in part by the project's exacerbation of the existing environmental conditions; or be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

- **GEO-3:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

4.7.4.2 Methodology

Geology and Soils

The analysis of impacts associated with geology and soils evaluates the potential geologic and soils hazards associated with the proposed development, including faulting/ground rupture, soil stability (soft/compressible soils, liquefaction, expansive soils, bedrock and/or other obstructions), and potential shallow groundwater/caving soils. The impact analysis identifies potential geological and soils hazards that could occur as a result of the Project.

The analysis is based, in part, on the Preliminary Geotechnical Report included as Appendix E of this Draft EIR. The report includes: evaluation of prior geotechnical investigations of, and prior core penetration tests (CPTs) and laboratory testing of core samples taken from, the Project Site and other areas of the greater PSJHC Campus to determine the nature and stratigraphy of the subsurface soils and depth to groundwater; engineering analysis; review of applicable government geotechnical information, plans and maps to identify any designated geotechnical hazards; identification of applicable seismic design parameters based on the current CBC; and identification of preliminary recommendations for earthwork and grading, subgrade preparation, shoring, foundations, walls below grade, and building design given existing geology and soils conditions at the Project Site. The locations of the prior on-site geotechnical investigations and CPTs are identified in the Preliminary Geotechnical Report. The results of the prior field explorations and laboratory tests are included in the appendices of the Preliminary Geotechnical Report.

Paleontological Resources

The analysis of paleontological resources is based on a review of the LACM paleontological records search results, as well as geologic map and literature reviews.

The objective of the analysis was to determine the geological formations underlying the Project Site, whether any paleontological localities have previously been identified within the Project Site or in the same or similar formations near the Project Site, and the potential for excavations associated with the Project to encounter paleontological resources. These methods are consistent with the SVP guidelines for assessing the importance of paleontological resources in areas of potential environmental effect.

Although no known resources were identified within the Project Site from the LACM search, this does not preclude the existence of previously unknown buried paleontological resources within the Project Site that may be impacted during construction of the Project.

4.7.4.3 Project Characteristics

The Project would replace existing buildings and parking lots on the Project Site with 10 new medical buildings (some with subterranean parking), 10 replacement multi-family housing units, and enhanced vehicular and pedestrian circulation connections. The proposed buildings would be up to six stories (105 ft) in height above grade and up to five levels (60 ft) below grade.

The code enforcing agency for the new structures is generally planned to be the City of Santa Monica rather than OSHPD. Per 2016 CBC, Section 1.10.3, licensed clinics and any freestanding building under a hospital license where outpatient clinical services are provided would be required to comply with OSHPD 3 requirements. If the West Ambulatory and Acute Care Building (Building 2C) and/or the East Ambulatory and Acute Care Building (Building 2D/E) are planned to be used as a "hospital building" as defined in California Health and Safety Code section 129725 and Section 7-111 of Part 1, Chapter 7 of Title 24 of the California Code of Regulations, that building (or buildings) will fall under OSHPD jurisdiction. All new buildings would be designed and constructed in accordance with the City's SMBC (which incorporates local amendments to the CBC) and/or OSHPD requirements.

Prior to the issuance of grading or building permits, new construction for the Project would be subject to a site-specific Final Geotechnical Report that would be reviewed and approved by the City's Building and Safety Division. The Final Geotechnical Report would be prepared in accordance with the requirements of the City's most recent Guidelines for Geotechnical Reports. The City's Building and Safety Division requires the approval of a Final Geotechnical Report that specifically addresses the conditions at a project site and the proposed building design at the time of final building plan check. Such reports must identify design requirements for structures and foundations to ensure structural integrity and occupant safety. All recommendations and design features in the Final Geotechnical Report are required to be incorporated into the building design.

In addition, all excavation activities would be required to adhere to provisions of the SMMC, which includes requirements for safeguards at work sites to ensure stable excavations and cut or fill slopes. Excavation and shoring requirements are enforced through the City's plan check process, which requires project applicants to prepare and submit excavation and shoring plans to the City's Building and Safety Division prior to the issuance of a building permit.

4.7.4.4 Project Impacts

Geologic Hazards

Impact GEO-1: *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death, involving: (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides?*

Impact Statement GEO-1: The Project would not cause potential adverse environmental conditions involving fault rupture, strong seismic ground shaking, seismic-related ground failure (including liquefaction), or landslides. Also, while the Project could be subject to strong seismic ground shaking and seismic-related risks during an earthquake, compliance with applicable regulations and with the recommendations of the Final Geotechnical Reports would minimize associated risks. Therefore, impacts would be less than significant.

Fault Rupture

The Compton Thrust fault underlies the Project Site at depth, however, however this thrust fault is not exposed at the surface and does not present a potential surface fault rupture hazard. Furthermore, the Project Site is not located within a designated Alquist-Priolo Special Study Fault Zone. Therefore, the Project would not expose people or structure to potential substantial adverse effects involving fault rupture caused in whole or in part by the Project. No impact would occur.

Seismic Ground Shaking

Similar to other sites in the Southern California region, the Project vicinity can experience strong ground motion due to earthquakes on a number of active faults in the Los Angeles basin. A major earthquake fault, such as the Santa Monica fault located approximately 1,300 feet north of the Project Site, has the potential of producing strong seismic ground shaking at the Project Site. This level of seismic ground shaking could result in damage to structures and hazards to people.

However, the Preliminary Geotechnical Report indicates that: (1) the above level of ground acceleration is common in Southern California; and (2) the associated effects can be mitigated through compliance with the geotechnical engineering design and construction standards specified by the CBC for the seismic design parameters for the Project identified in **Table 4.7-2**, *Seismic Design Parameters for the Project*. These seismic design parameters were determined in the Preliminary Geotechnical Report in accordance with the 2016 CBC and ASCE 7-10 Standards using the United States Geological Survey (USGS) Seismic Design Maps Web Application. The CBC Site Class was determined to be Site Class "C" based on the results of the prior explorations, nearby shear wave velocity data, the anticipated occupancy type and basement depths, and a review of the local soil and geological conditions. Site Class "C" indicates moderate seismic vulnerability. The values in Table 4.7-2 are to be used by the structural engineer in designing the structures to resist the effects of earthquake motions in accordance with Section 1613 of the 2016 CBC; no other special seismic design requirements are associated with CBC Site Class "C".

Furthermore, the Project would be required to prepare and submit a site-specific Final Geotechnical Report for review and approval by the City's Building and Safety Division prior to the issuance of grading or building permits. The Final Geotechnical report would be prepared in accordance with the requirements of the City's most recent Guidelines for Geotechnical Reports, which require projects to evaluate site-specific geologic hazards, including seismic ground shaking hazards. Projects are required to assess the site-specific peak ground acceleration associated with a 10 percent probability of exceedance in 50 years and are required to incorporate seismic design factors to mitigate for such risk. The Project would not directly or indirectly cause or exacerbate existing seismic risks from the construction of new buildings.

Compliance with Title 24 of the SMBC and/or OSHPD requirements, along with implementing the recommendations of the Final Geotechnical Reports covering foundations, excavations, slopes, groundwater control, and grading, the Project would not expose people or structure to potential substantial adverse effects involving seismic groundshaking caused in whole or in part by the Project. Accordingly, impacts would be less than significant.

TABLE 4.7-2
SEISMIC DESIGN PARAMETERS FOR THE PROJECT

Parameter	Mapped Value
S_s (0.02 second period	2.09g
S_1 (1.0 second period	0.77g
Site Class	C
F_a	1.0
F_v	1.3
$S_{MS} = FaS_s$ (0.2 second period)	2.09g
$S_{M1} = F_vS_1$ (1.0 second period)	1.01g
S_{DS} = 2/3 x S_{MS} (0.2 second period)	1.39g
S_{D1} = 2/3 x S_{M1} (1.0 second period)	0.67g

Where:
- SS = mapped risk-targeted maximum considered earthquake (MCER), 5% damped, spectral response acceleration parameter at short periods.
- S1 = mapped MCER, 5% damped, spectral response acceleration parameter at a spectral period of 1 second.
- SMS = mapped MCER, 5% damped, spectral acceleration response acceleration parameter at short periods adjusted for site effects.
- SM1 = mapped MCER, 5% damped, spectral acceleration response acceleration parameter at a spectral period of 1 second adjusted for site effects.
- SDS = mapped design, 5% damped, spectral acceleration response acceleration parameter at short periods adjusted for site effects.
- SD1 = mapped design, 5% damped, spectral acceleration response acceleration parameter at a spectral period of 1 second adjusted for site effects.

SOURCE: Wood Environment & Infrastructure Solutions Inc., Report of Preliminary Geotechnical Consultation – Proposed Master Planning Study – Providence Saint John's Health Center Phase II Project, 2125 Santa Monica Boulevard, Santa Monica, California, June 15, 2018.

Liquefaction

The results of the borings at the Project Site indicate that the soils below the historic-high groundwater level are generally dense and stiff. Furthermore, the Project Site is not located in either a State of California (California Division of Mines and Geology or 1999) or City (see Figure 4.7-2) designated Liquefaction Hazard Zone. Therefore, the Preliminary Geotechnical Report concludes that the liquefaction potential at the Project Site is low. Nevertheless, the Preliminary Geotechnical Report indicates that a site-specific liquefaction evaluation would be required in the Final Geotechnical Report for each development site as required by existing regulations, with any geotechnical engineering and design recommendations made in that report required to be implemented. Therefore, as the Project Site is not be subject to significant liquefaction hazards, the Project would not expose people or structure to potential substantial adverse effects involving liquefaction caused in whole or in part by the Project, and a less than significant impact would occur.

While the Project would not be subject to significant liquefaction hazards, since groundwater seepage was encountered in several of the borings within and adjacent to the Project Site at depths as shallow as 22 feet below the existing grade, and since Project structures are proposed at up to five levels below grade or 60 feet bgs, the Preliminary Geotechnical Report indicates that groundwater control measures may be required during construction of the foundations and lower levels to prevent collapse. This is particularly true for the Phase II development sites in the North Campus. However, since groundwater was not encountered within the likely excavation depths (only groundwater seepage), significant dewatering using wells is not anticipated to be required,

and a system of trenches and sumps may be adequate during construction if seepage is encountered. Although not anticipated, the Preliminary Geotechnical Report recommends that: (1) the need for permanent dewatering and a sub-floor drainage system should be assessed in the required Final Geotechnical Report based on the current groundwater conditions underlying each proposed building site as determined by new borings; and (2) all retaining walls and walls below grade be thoroughly waterproofed and provided with drainage or designed to resist hydrostatic pressures. Therefore, with compliance with the applicable recommendations of the Final Geotechnical Reports, impacts would be less than significant.

Landslides and Slope Instability

As indicated previously, the Project Site is not located within a City-identified landslide area or a CGS-identified area of potential seismic slope instability, the topography of the Project Site and its surroundings is relatively flat which precludes stability problems, and the Project Site is neither near or within the path of known or potential landslides. Therefore, the Project Site is not susceptible to landslides or slope instability. Furthermore, while the Preliminary Geotechnical Report indicates that, due to the alluvial and marine deposits at the Project Site, Project excavations could be prone to reveling and caving, compliance with applicable State and City regulations, would reduce associated risks to acceptable levels. This includes compliance with the Preliminary Geotechnical Report recommendations covering excavations, slopes, and groundwater, including the need for temporary shoring of vertical excavation faces.

The Project applicant would also be required to prepare and submit a site-specific Final Geotechnical Report for City review and approval as discussed previously, which would include a site-specific evaluation of landslide and slope instability hazards and the identification of measures to mitigate for such risk.

Therefore, with compliance with the applicable recommendations of the Final Geotechnical Reports, the Project would not expose people or structure to potential substantial adverse effects involving landslides and slope instability caused in whole or in part by the Project. Accordingly, impacts would be less than significant.

Unstable Geologic Units

Impact GEO-2: *Would the project 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; caused in whole or in part by the project's exacerbation of the existing environmental conditions?*

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

Impact Statement GEO-2: The Project could result in unstable soil conditions and expansive soils if appropriate design measures are not taken. However, the Project would be required to meet State and City Building Code requirements and comply with the design recommendations of the Final Geotechnical Reports. Regulatory compliance would ensure that impacts related to unstable soil conditions and expansive soils, caused in whole or in part by the Project's exacerbation of the existing environmental conditions, would be less than significant.

Landslides

See analysis under Impact Statement GEO-1 above (less than significant with mitigation).

Lateral Spreading

As indicated previously, lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The potential for lateral spreading on the Project Site is low because the liquefaction potential is low. Therefore, the Project would not 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 lateral spreading, caused in whole or in part by the Project's exacerbation of the existing environmental conditions. No impact would occur.

Subsidence

According to Preliminary Geotechnical Report, the Project Site is not located within an oil filed or within an area of known subsidence associated with fluid withdrawal (groundwater or petroleum), peak oxidation, or hydrocompaction, and that the potential for on-site subsidence is low. Therefore, the Project would not 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 subsidence, caused in whole or in part by the Project's exacerbation of the existing environmental conditions. A less than significant impact would occur.

Liquefaction

See analysis under Impact Statement GEO-1 above (less than significant impact with mitigation).

Differential Settlement (including Collapse)

According to the Preliminary Geotechnical Report, due to the types of soils, depth of groundwater, and seismic conditions at the Project Site, potential seismically-induced settlement (including collapse) at the Project Site is not anticipated to exceed 1 inch, with differential settlement between building support columns not anticipated to exceed ½ inch, although the extent of any settlement is based, in part, on excavation depths. This level of settlement would be addressed with compliance with the SMBC, and the recommendations of the Preliminary and Final Geotechnical Reports. In particular, the Preliminary Geotechnical Report indicates the following:

- Buildings should be designed to accommodate the dynamic and static settlement estimates provided above.
- The existing fill soils on the Project Site are not considered suitable for support of new structures on conventional spread/continuous footings. If the fill soils are excavated and replaced as properly compacted fill, relatively light at-grade building may be supported on spread/continuous footings established on properly compacted fill and the floor slabs may be

supported on grade.

- After the Project Site is cleared and any existing fill soils are excavated and removed, the exposed natural soils should be carefully observed for the removal of all unsuitable deposits. The exposed soils should be scarified to a depth of 6 inches, brought to near-optimum moisture content, and rolled with heavy compaction equipment. At least the upper 6 inches of the exposed soils, and any required fill, should be compacted to at least 90 percent of the maximum dry density obtainable by the ASTM Designation D1557 method of compaction.
- Since the upper silty soils may be susceptible to hydroconsolidation and become weaker and more compressible when wet, and the upper clayey soils may be somewhat expansive, remedial grading may be required for support of footings and floor slabs for at-grade structures. Such remedial grading measures would likely consist of the placement of approximately two feet of properly compacted fill beneath footing and floor slaps, with this fill soil needing to consist of relatively non-expansive soils.
- Based on the data obtained from the borings, excavations for those proposed buildings with one or more subterranean levels are anticipated to remove the existing fill soils. Remedial grading measures would likely not be required for support of new relatively heavy (maximum dead-plus-live column loads on the order of 1,500 kips or less) structures with subterranean levels. It would likely be feasible to support such structures on conventional spread/continuous footings underline by undisturbed natural soils.
- For heavier structures with subterranean levels, relatively heavy at-grade structures, and structures with large overturning loads, the use of drilled cast-in-place concrete piles may be required for foundations support. However, since a significant amount of gravel was encountered in some areas, with some cobbles and boulders, the installation of drilled piles could be difficult, particularly where groundwater seepage was encountered. Special techniques, such as the use of casing, drilling mud, and/or specialty augers, could be necessary to drill through cobble and boulder layers and to prevent caving of the sidewalks during drilling. Settlement of new structures, supported on drilled cast-in-place concrete pile foundations in the manner recommended above, would be expected to be less than ½ inch with differential settlement less than ¼ inch between adjacent foundation columns. Blasting and percussive pile driving would not be required.
- A site-specific seismically-induced settlement evaluation would be required in the Final Geotechnical Report for each development site as required by existing regulations.

See the Preliminary Geotechnical Report for additional discussion, more detailed recommendations covering foundations, and recommendations covering excavations, slopes, groundwater control, and grading.

Again, with compliance with the SMBC and/or OSHPD requirements, and the recommendations of the Final Geotechnical Reports, the Project would not 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 differential settlement (including collapse). Accordingly, impacts would be less than significant.

Expansive Soils

According to the Preliminary Geotechnical Report, the upper clayey soils in some areas of the Project Site is slightly expansive. With adherence to the recommendations in the Final Geotechnical

Reports related to differential and grading, impacts associated with expansive soils would be reduced a less than significant level.

Paleontological Resources and Unique Geologic Features

Impact GEO-3: *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Impact Statement GEO-3: The Project Site does not contain unique geologic features, and as such the Project would no impact on such features. However, Project grading and excavation may encounter native soil/sediment associated with Older Quaternary Alluvium which has high potential for containing buried paleontological resources. As a result, Project construction activities may directly or indirectly destroy unique paleontological resources or sites, and a potentially significant impact could occur.

Paleontological Resources

The LACM database search results indicate that surface deposits in the eastern portion of the Project Site consist of younger Quaternary alluvium, while the western portion consists of older Quaternary alluvium. No fossil localities have been documented within the Project Site; however, two localities (LACM 5462 and LACM 7879) from older Quaternary sediments are situated between approximately 0.55 to 1.9 miles away from the Project Site. These localities produced specimens of extinct lion, horse, and ground sloth from depths of 6 and 11 feet below ground surface.

Younger Quaternary alluvium near the surface of the Project Site is not expected to preserve fossil resources, but as depth increases, the potential for fossils to be preserved increases. Thus, younger Quaternary alluvium has a low-to-high paleontological sensitivity. Older Quaternary alluvium, present at the surface of the northern and western portions of the Project Site and in the subsurface throughout the Project Site, has high paleontological sensitivity. It is anticipated that fossils could be encountered at depths as shallow as 6 feet based on nearby discoveries from similar sediments. Therefore, impacts to buried paleontological resources are considered potentially significant. Mitigation Measures GEO-1 through GEO-3 are prescribed to ensure that potentially significant impacts to paleontological resources are reduced to a less than significant level.

Unique Geologic Features

The Project Site is fully graded and developed with urban uses, and does not contain unique geologic features. Therefore, the Project would not directly or indirectly a unique geologic feature, and no impacts would occur.

4.7.4.5 Cumulative Impacts

Geology and Soils

As with all development in the region, cumulative projects listed in Table 3-1 in Chapter 3 of this EIR would be subject to potential groundshaking during an earthquake. Additionally, depending on site location and construction activities, new development could cause unstable soil conditions including landslides, liquefaction, subsidence, collapse, or expansive soils. Potential impacts at individual project sites are generally site-specific. As indicated in Figure 3-1 in Chapter 3-1 of this

Draft EIR, the closest cumulative project is at 2225 Broadway (Cumulative Project no. 34) immediately east of the Project Site (Site S2). However, this approved cumulative project would be constructed years in advance of the Project's development of Site S2. As such, cumulative effects associated with geology/soils during construction would not occur.

Furthermore, all cumulative projects would also be required to be constructed pursuant to the SMBC regulatory standards that provide for building safety, and prepare and submit site-specific Final Geotechnical Reports for review and approval by the City's Building and Safety Division prior to the issuance of grading or building permits. Final Geotechnical reports would be prepared in accordance with the requirements of the City's most recent Guidelines for Geotechnical Reports. The City's Building and Safety Division requires the approval of the Final Geotechnical Report that specifically addresses the conditions at a project site and the proposed building design at the time of final building plan check.

Therefore, cumulative geology and soils impacts would be less than significant.

Paleontological Resources and Unique Geologic Features

The Project Site does not contain unique geologic features, nor does most if not all of the surrounding Downtown Area is mostly fully developed with urban uses. Therefore, cumulative impacts to unique geologic features would be less than significant, and the Project's contribution to these impacts would not be cumulatively considerable.

Cumulative projects occurring in the City could include excavation activities at sites that may have paleontological resources within older Quaternary alluvium. Therefore, there is potential to uncover significant paleontological resources depending on the construction site and sensitivity for paleontological resources to occur. However, in association with CEQA review, and depending on the depth of excavation and sensitivity of respective sites, mitigation measures would be required for projects on a case by case basis to protect undiscovered resources. These measures would include a monitoring program and treatment/curation of discovered fossils. Implementation of these measures would reduce the potential for adverse effects on fossil resources individually and cumulatively and would preserve and maximize the potential of these resources to contribute to the body of scientific knowledge. Therefore, cumulative effects would be less than significant.

The Project would be required to comply with mitigation measures MM-GEO-1 through MM-GEO-3, thus ensuring proper identification, treatment and preservation of any resources, and reducing impacts on paleontological resources to less than significant levels. These measures require construction monitoring of excavation activities, and treatment and curation of discoveries, if encountered. Therefore, to the extent impacts on paleontological resources from cumulative projects may occur, the Project's impacts would not be cumulatively considerable, and the cumulative impacts of the Project would be less than significant.

4.7.5 Mitigation Measures

4.7.5.1 Geology and Soils

Project impacts would be less than significant with compliance with applicable regulations and the recommendations of the Preliminary and Final Geotechnical Reports. No mitigation measures are required.

4.7.5.2 Paleontological Resources and Unique Geologic Features

The following mitigation measures have been prescribed to reduce potentially significant impacts on paleontological resources:

MM-GEO-1: Prior to start of any ground-disturbing activities (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil) for each construction site, the Applicant shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology standards (SVP, 2010). The Qualified Paleontologist shall conduct construction worker paleontological resources sensitivity training for appropriate construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project area and the procedures to be followed if they are found. The Applicant shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

MM-GEO-2: Full-time paleontological resources monitoring shall be performed by a qualified paleontological monitor under the direction of the Qualified Paleontologist (SVP, 2010) for ground disturbance in undisturbed soils below a depth of 6 feet. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Paleontologist. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils, in a radius of at least 50 feet, in order to recover the fossil specimens. Any significant fossils collected during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. The Qualified Paleontologist shall prepare a final monitoring and mitigation report to be submitted to the City.

MM-GEO-3: If construction or other Project personnel discover any potential fossils during construction, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and made recommendations as to the appropriate treatment. If the find is deemed significant, it shall be salvaged following the standards of the SVP (2010) and curated with a certified repository.

4.7.6 Level of Significance After Mitigation

4.7.6.1 Geology and Soils

No mitigation measures are required for geology and soils; impacts would be less than significant.

4.7.6.1 Paleontological Resources and Unique Geologic Features

No mitigation measures are required for unique geologic features; no impacts would occur.

With regards to paleontological resources, with implementation of the mitigation measures above, the Project would not directly or indirectly destroy a unique paleontological resource or site. The implementation of the above mitigation measures provides for appropriate treatment and/or preservation of resources, if encountered. Potentially significant impacts to paleontological resources would be reduced to a less than significant level.

4.8 Greenhouse Gas Emissions

4.8.1 Introduction

This section analyzes greenhouse gas (GHG) emissions generated by the construction and operation of the Project, inclusive of the sustainability features that have been incorporated into the Project design to reduce GHG emissions and associated impacts. The analysis also addresses the consistency of the Project with applicable regulations, plans, and policies to reduce GHGs, set forth by, the State of California, South Coast Air Quality Management District (SCAQMD), Southern California Association of Governments (SCAG), and the City of Santa Monica (City) to reduce GHG emissions. Details regarding the GHG emissions calculations are provided in the emissions modeling worksheets provided in Appendix G of the this EIR.

4.8.2 Environmental Setting

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Historical records indicate that global climate changes have occurred in the past due to natural phenomena; however, current data increasingly indicate that the current global conditions differ from past climate changes in rate and magnitude. Global climate change attributable to anthropogenic (i.e., caused or influenced by humans) GHG emissions is currently one of the most important and widely debated scientific, economic, and political issues in the U.S. and in the rest of the world. The extent to which increased concentrations of GHGs have caused or will cause climate change, and the appropriate actions to limit and/or respond to climate change, are the subject of significant and rapidly evolving regulatory efforts at the federal and state levels of U.S. government.

GHGs are a group of compounds in the Earth's atmosphere, which play a critical role in determining temperature near the Earth's surface. When sunlight reaches the Earth's surface, solar radiation is either reflected back into space, or absorbed by the Earth systems (oceans, land, and atmosphere) which is released as heat. GHGs in the atmosphere allow solar radiation to enter the Earth's atmosphere, but as low-frequency infrared radiation is reflected back from the Earth's surface towards space, GHGs in the atmosphere retain some of the reflected radiation, resulting in a warming of the atmosphere, known as the greenhouse effect.

Not all GHGs possess the same ability to induce climate change. GHGs differ in their ability to absorb energy (i.e., "radiative efficiency") and stay in the atmosphere (i.e., "lifetime"). The Global Warming Potential (GWP) was developed to allow comparisons of the global warming impacts of different GHGs. The net effect of energy absorption and lifetime is reflected in the GWP of each GHG. Mass GHG emissions are calculated by converting the emissions of specific GHGs (e.g., carbon dioxide (CO_2)) to units of equivalent mass of carbon dioxide (CO_2e) emissions, by applying the GWP value applicable to each GHG.[1] CO_2 is the primary GHG contributing to recent climate change; therefore, CO_2 is the reference gas for determining the GWPs of other GHGs and has a GWP of 1. While methane (another common GHG), for example, has a GWP of 21. By applying

[1] GWPs and associated CO_2e values were developed by the Intergovernmental Panel on Climate Change (IPCC), which updated the GWP values based on the latest science in its Fourth Assessment Report (AR4). CARB reports GHG emission inventories for California using the GWP values from the IPCC AR4.

the GWP ratios, project-related CO2e emissions can be tabulated in metric tons per year. Typically, the GWP ratio corresponding to the warming potential of CO_2 over a 100-year period is used as a baseline. CO_2e emissions are calculated for construction years, as well as, existing and project build-out conditions to generate a net change in GHG emissions for construction and operation. Compounds that are regulated as GHGs are discussed below.

- **Carbon Dioxide (CO_2):** CO_2 is the most abundant GHG in the atmosphere, primarily generated from fossil fuel combustion from stationary and mobile sources. CO_2 has a lifetime of thousands of years, with a GWP of 1;
- **Methane (CH_4):** CH_4 is emitted from the activity of biogenic sources (i.e., living organisms), incomplete combustion from forest fires, landfills, and manure management, and leaks in natural gas pipelines. CH_4 has a lifetime of approximately 10 years, with a GWP of 21 or 25;
- **Nitrous Oxide (N_2O):** N_2O is produced by human-related sources including agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuel, adipic acid production, and nitric acid production. N_2O has a lifetime of approximately 100 years with a GWP of 310 or 298; and
- **High-GWP GHGs:** Hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs), and sulfur hexafluoride (SF_6) are fluorinated compounds, known as high-GWP GHGs, because, for a given amount of mass, they trap substantially more heat than CO_2. The GWPs for these GHGs can be in the thousands or tens of thousands.):
  - **Hydrofluorocarbons (HFCs):** HFCs are typically used as refrigerants in both stationary refrigeration and mobile air conditioning systems. HFCs have GWPs ranging from 140 to 14,800;
  - **Perfluorocarbons (PFCs):** PFCs are primarily created as a byproduct of aluminum production and semiconductor manufacturing. PFCs have GWPs ranging from 6,500 to 17,700; and
  - **Sulfur Hexafluoride (SF_6):** SF_6 is a colorless, odorless, nontoxic, nonflammable gas, commonly used as an electrical insulator in high voltage equipment that transmits and distributes electricity. SF_6 has a GWP ranging from 23,900 to 22,800.

4.8.2.1 Existing Conditions

Existing GHG Emissions Generated On-site

Site 2C

Site 2C is currently developed as a paved surface parking lot (West Lot) along Santa Monica Boulevard. Site 2C includes a landscaped area to the north of the West Lot, along the perimeter of the West Lot, and within the West Lot. Although site 2C consists primarily of a paved surface parking lot and does not itself generate GHG emissions, maintenance of the landscaped areas would generate GHG emissions.

Site 2D/E and Mullin Plaza Site

Site 2D/E is currently developed with a surface parking lot (Lot C) and a two-story, 10,800 square foot concrete office building. The parking lot itself does not generate air pollutant emissions; however, operation of the onsite building is a source of GHG emissions.

The Mullin Plaza site is currently developed with open space, landscaped areas, and driveways as the main vehicular access to the PSJHC from Santa Monica Boulevard. Maintenance of the landscaped areas generate GHG emissions.

Sites S1 & S3 (South Campus – West Side)

The S1 and S3 Sites are currently developed with surface parking lots (Lot B and Lot I) and two temporary trailer buildings totaling 2,675 square feet for the PSJHC MRI facilities. Operation of the onsite building is a source of GHG emissions.

Site S2

Site S2 is developed with a portion of a surface parking lot (Lot H) that is used by PSJHC. The parking lot itself does not generate GHG emissions.

Site S4

Site S4 is currently developed with the John Wayne Cancer Institute Building, a vacant ten-unit multifamily apartment building, and a paved surface parking lot (a portion of Lot H). The parking lot itself does not generate GHG emissions; however, operation of the John Wayne Cancer Institute is a source of GHG emissions.

Site S5

Site S5 is currently with a surface parking lot (a portion of Lot H). The parking lot itself does not generate GHG emissions.

As discussed above, various areas of the Project Site are currently developed. As part of the Project, portions of the developed areas would be removed, thus the emissions associated with these developments would be removed and would be applied as a credit to the Project's emissions resulting in net emissions (Project minus Existing).

Greenhouse Gas Emissions Inventory

CARB compiles annual GHG inventories for the State of California to track progress toward meeting statewide GHG targets. Based on the most recent (2018) edition of the California GHG Inventory: 2000 - 2016 (i.e., 2016 the recent year annual GHG data available) (CARB 2018), shows that California's GHG emissions continue to decrease annually, a trend observed since 2007. In 2016, California emitted 429 million metric tons of CO_2e ($MMTCO_2e$), 12 $MMTCO_2e$ lower than 2015 levels, which puts the 2016 emissions just below the 2020 target of 431 $MMTCO_2e$ (CARB 2018). Annual GHG emissions vary from year-to-year depending on the weather and other factors, but California will continue to implement its GHG reductions program to ensure the state remains on track to meet its climate targets in 2020 and beyond. These reductions come while California's economy grows and continues to generate jobs. Compared to 2015, California's gross domestic product (GDP) grew 3 percent while the carbon intensity of its economy declined by 6 percent (CARB 2018). The transportation sector remains the largest contributor to statewide GHG emissions at 39 percent, up from 37 percent in 2015.

Total 2015 GHG emissions for the City of Santa Monica (the most recent year available) were estimated at approximately 1,110,315 $MTCO_2e$. Transportation emissions constituted 65 percent of total GHG emissions while commercial, residential, industrial, and solid waste, and aviation represented 14 percent, 12 percent, 5 percent, 3 percent, and 2 percent, respectively. Total per capita GHG emissions from the City in 2015 were 11.9 $MTCO_2e$ per person.

Effects of Global Climate Change

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth's climate system and inability to accurately model it, the uncertainty surrounding climate change may never be completely eliminated. Nonetheless, the IPCC's *Fifth Assessment Report, Summary for Policy Makers* states that, "it is *extremely likely* that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in greenhouse gas concentrations and other anthropogenic forc[es [*sic*] together" (IPCC 2013). The National Academy of Sciences concluded that 97 to 98 percent of the climate researchers most actively publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity (Anderegg et. al 2010). According to CARB, the potential impacts in California due to global climate change may include: loss in snow pack; sea level rise; more extreme heat days per year; more high ozone days; more large forest fires; more drought years; increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation (Cal EPA 2006). Below is a summary of some of the potential effects that could be experienced in Santa Monica as a result of global warming and climate change.

In 2009, the California Natural Resources Agency (CNRA) published the *California Climate Adaptation Strategy* as a response to the Governor's Executive Order S-13-2008 (CNRA 2009a). In 2014, CNRA rebranded the first update of the 2009 adaptation strategy as the *Safeguarding California Plan*. In 2016, the CNRA released *Safeguarding California: Implementation Action Plans* in accordance with Executive Order B-30-15 (CNRA 2014). *Safeguarding California* lists specific recommendations for state and local agencies to best adapt to the anticipated risks posed by a changing climate. In accordance with the 2009 *California Climate Adaptation Strategy*, in 2011, the California Energy Commission (CEC) developed the Cal-Adapt website on potential future climate change scenarios and impacts that would be beneficial for local decision makers (Cal-Adapt 2018). The data on the Cal-Adapt website are comprised of the average values (i.e., temperature, sea level rise, snowpack) from a variety of scenarios and models and are meant to illustrate how the climate may change based on a variety of different potential social and economic factors. According to the Cal-Adapt website, the portion of the City of Santa Monica, in which the Project Site is located, could result in an average increase in temperature of approximately 6 to 10 percent (approximately 4.1 to 6.9°F) by 2070-2099, compared to the baseline 1961-1990 period.

Air Quality

Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would exacerbate air quality. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state (CEC 2006). However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires.

Air quality in Santa Monica and surrounding areas is expected to worsen with increased climate change. Santa Monica has been designated as a non-attainment area for ozone, PM10, and PM2.5 and increased climate change would exacerbate concentrations of these pollutants. In 2013, Santa Monica only exceeded the federal ozone standard a few days, however, with increased climate changes, the number of non-attainment days is likely to trend upward (City of Santa Monica 2017).

Water Supply

Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, "Considerable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change." For example, some studies identify little change in total annual precipitation in projections for California while others show significantly more precipitation. Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full. Conversely, reductions in spring runoff and higher evapotranspiration because of higher temperatures could reduce the amount of water available for recharge. (Pacific Institute for Studies in Development 2013).

The California Department of Water Resources report on climate change and effects on the State Water Project, the Central Valley Project, and the Sacramento-San Joaquin Delta, concludes that "climate change will likely have a significant effect on California's future water resources…[and] future water demand." The report also states that "much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain." The report also states that the relationship between climate change and its potential effect on water demand is not well understood, but "[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future." Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows (CDWR 2006). The Intergovernmental Panel on Climate Change (IPCC) states that "Changes in the global water cycle in response to the warming over the 21st century will not be uniform. The contrast in precipitation between wet and dry regions and

between wet and dry seasons will increase, although there may be regional exceptions." (IPCC 2013)

Duration and severity of droughts in California are likely to increase to due to climate change. California most recently experienced increased drought conditions over 2011-2015. By January 2015, the majority of the state was designated as extreme or exceptional drought conditions. (City of Santa Monica 2017) Based on data from the National Oceanic and Atmospheric Administration, historic precipitation levels in Los Angeles have fluctuated over time, however, the overall trend indicate precipitation levels decreasing. Due to anticipated warmer temperatures, more precipitation will fall as rain instead of snow which would reduce Southern California's window of time to capture stored water as snowpack. (City of Santa Monica 2017)

Hydrology and Sea Level Rise

As discussed above, climate changes could potentially affect: the amount of snowfall, rainfall and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Sea level rise can be a product of global warming through two main processes: expansion of seawater as the oceans warm, and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Sea level rise is concerning for Santa Monica because of its coastline location. Based on data from the National Oceanic and Atmospheric Administration, the mean sea level rise around the Los Angeles area is about 0.95 millimeters per year over a period from 1923 to 2015. Based on model projections for Santa Monica, sea level rise for 2017 to 2030 ranges from 5.3" to 12", 2030-2050 ranges from 11.6" to 23.8", and 2050 to 2100 ranges from 36.6" to 113". (City of Santa Monica 2017) Sea level rise could exacerbate coastal flooding impacts from storm surges and big-waves storms, and lead to greater loss of land which also result in economic consequences. (City of Santa Monica 2017) Santa Monica is a major tourist destination and has physical assets and facilities along the coast which are vulnerable to the impacts of sea level rise.

Agriculture

California has a $30 billion agricultural industry that produces half the country's fruits and vegetables. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop-yield could be threatened by a less reliable water supply; and greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thus affect their quality (CCCC 2006).

Ecosystems and Wildlife

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature

could rise by 2 to 11.5°F (1.1 to 6.4°C) by 2100, with significant regional variation (NRC 2010). Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as two feet along most of the United States coastline. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes such as carbon cycling and storage (Parmesan et. al 2004).

4.8.3 Regulatory Framework

GHG statutes, regulations, plans, and policies have been developed, adopted, and implemented at the federal, state, and local levels. This section provides a summary of pertinent GHG regulations affecting the Project at the federal, state, and local levels.

4.8.3.1 Federal

The federal government administers a wide array of programs to address the GHG generated in the U.S. These programs focus on energy efficiency, renewable energy, methane and other non-CO_2 GHGs, agricultural practices, and implementation of technologies to achieve GHG reductions.

At the federal level, the United States Environmental Protection Agency (EPA) is responsible for implementing federal policy to address GHGs. The EPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the ENERGY STAR labeling system for energy-efficient products) play a significant role in encouraging voluntary GHG reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

In *Massachusetts v. Environmental Protection Agency* (Docket No. 05–1120), the U.S. Supreme Court held in 2007 that EPA has statutory authority under Section 202 of the Clean Air Act (CAA) to regulate GHGs. The Court did not hold that the EPA was required to regulate GHG emissions; however, it indicated that the agency must decide whether GHGs cause or contribute to air pollution that is reasonably anticipated to endanger public health or welfare.

In 2009, a national policy was adopted for fuel efficiency and emissions standards in the U.S. auto industry, which applies to passenger cars and light-duty trucks for model years 2012 - 2016. The standards surpass the prior Corporate Average Fuel Economy standards, and requires an average fuel economy standard of 35.5 miles per gallon (mpg) and 250 grams of CO_2 per mile by model year 2016, based on EPA calculation methods. In 2012, standards were adopted for model year 2017 - 2025 for passenger cars and light-duty trucks. By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO_2 per mile. According to the EPA, a model year 2025 vehicle would emit one-half of the GHG emissions from a model year 2010 vehicle (USEPA 2012).

In 2009, regarding GHGs under Section 202(a) of the CAA, the EPA adopted a Final Endangerment Finding for the six defined GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6). The Endangerment Finding is required before USEPA can regulate GHG emissions under Section 202(a)(1) of the CAA consistently with the U.S. Supreme Court decision. USEPA also adopted a Cause or

Contribute Finding in which the USEPA Administrator found that GHG emissions from new motor vehicle and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare. These findings do not, by themselves, impose any requirements on industry or other entities. However, these actions were a prerequisite for implementing GHG emissions standards for vehicles.

4.8.3.2 State

California has promulgated a series of executive orders, laws, and regulations aimed at reducing both the level of GHGs in the atmosphere and emissions of GHGs from commercial and private activities within the State.

California Greenhouse Gas Reduction Targets

Executive Order B-55-18

Executive Order B-55-18 (September 2018) establishes a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. The executive order demonstrates the State's continued commitment to address climate change.

Executive Order B-30-15 and Senate Bill 32/Assembly Bill 197

In 2015, Executive Order B-30-15 established the following new interim GHG emission reduction target:

- By 2030, California shall reduce GHG emissions to 40 percent below 1990 levels.
- Ordered all state agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets.
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

Senate Bill (SB) 32 and its companion bill Assembly Bill (AB) 197, was passed in 2016. SB 32 expanded upon AB 32 (described below), amending the California Health and Safety Code (HSC) Division 25.5 to codify the GHG emissions target in Executive Order B-30-15 of 40 percent below 1990 levels by 2030. AB 197 provides the Legislature greater authority over the California Air Resources Board (CARB) and requires CARB to provide GHG emissions inventory report at least once a year.

Executive Order S-3-05 and Assembly Bill 32

In 2005, Executive Order S-3-05 established the following GHG emission reduction targets:

- By 2010, California shall reduce GHG emissions to 2000 levels.
- By 2020, California shall reduce GHG emissions to 1990 levels.
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

In 2006, the California State Legislature adopted AB 32 (codified in HSC Division 25.5 – California Global Warming Solutions Act of 2006), to codify the targets in Executive Order S-3-05 of reducing GHG emissions in California to 1990 levels by 2020. The law further requires that

reduction measures be technologically feasible and cost effective. Under AB 32, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing state actions that would achieve GHG emissions reductions equivalent to 1990 statewide levels by 2020.

California Air Resources Board

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, CARB conducts research, sets state ambient air quality standards (California Ambient Air Quality Standards [CAAQS]), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. CARB also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's State Implementation Plan (SIP), for which it works closely with the federal government and the local air districts. The SIP is required for the State to take over implementation of the CAA. CARB also has primary responsibility for adopting regulations to meet the State's goal of reducing GHG emissions to 1990 levels by 2020.

In 2004, CARB adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other toxic air contaminants (Title 13 California Code of Regulations [CCR], Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure generally does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given location with certain exemptions for equipment in which idling is a necessary function such as concrete trucks. While this measure primarily targets diesel particulate matter emissions, it has co-benefits of minimizing GHG emissions from unnecessary truck idling.

In 2008, CARB approved the Truck and Bus regulation to reduce particulate matter and nitrogen oxide emissions from existing diesel vehicles operating in California (13 CCR, Section 2025, subsection (h)). CARB has also promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower, such as, bulldozers, loaders, backhoes and forklifts, as well as, many other self-propelled off-road diesel vehicles. The regulation aims to reduce emissions by installation of diesel soot filters, and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models. Refer to Section 4.2, *Air Quality*, for additional details regarding these regulations. While these regulations primarily target reductions in criteria air pollutant emission, they have co-benefits of minimizing GHG emissions due to improved engine efficiencies.

2017 Climate Change Scoping Plan

In response to SB 32 and the required 2030 GHG reduction target, CARB adopted the 2017 Climate Change Scoping Plan in 2017 (CARB 2017b). In the 2017 Scoping Plan, CARB provides the estimated projected statewide 2030 emissions under business-as-usual (BAU) conditions (that is, emissions that would occur without any plans, policies, or regulations to reduce GHG emissions)

and the level of reductions necessary to achieve the 2030 target of 40 percent below 1990 levels. CARB's projected statewide 2030 BAU emissions takes into account 2020 GHG reduction policies and programs. A summary of the GHG emissions reductions required under SB 32 (HSC Division 25.5) is provided in **Table 4.8-1,** *Estimated Greenhouse Gas Emissions Reductions Required by HSC Division 25.5*.

TABLE 4.8-1
2017 ESTIMATED GREENHOUSE GAS EMISSIONS REDUCTIONS REQUIRED BY HSC DIVISION 25.5

Emissions Category	GHG Emissions ($MMTCO_2e$)
2017 Scoping Plan Update	
2030 BAU Forecast ("Reference Scenario" which includes 2020 GHG reduction policies and programs)	389
2030 Emissions Target Set by HSC Division 25.5 (i.e., 40% below 1990 Level)	260
Reduction below BAU Necessary to Achieve 40% below 1990 Level by 2030	129 (33.2%) [a]

[a] 389 – 260 = 129 / 389 = 33.2%

SOURCE: California Air Resources Board, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011; California Air Resources Board, 2020 Business-as-Usual (BAU) Emissions Projection, 2014 Edition, 2017, http://www.arb.ca.gov/cc/inventory/data/bau.htm. Accessed October 2017; California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017. Available at: https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Accessed September 2018.

The 2070 Scoping Plan outlines the strategies the State will implement to achieve the 2030 GHG reduction target. The Scoping Plan includes the Scoping Plan Scenario, which CARB stated "is the best choice to achieve the State's climate and clean air goals" (CARB 2017b). The Scoping Plan Scenario consists of ongoing and statutorily required programs and continuing the Cap-and-Trade Program, and was modified from the 2017 Scoping Plan to reflect AB 398, including removal of the 20 percent refinery measure. Under the Scoping Plan Scenario, the majority of the reductions would result from continuation of the Cap-and-Trade regulation. Additional reductions are achieved from increasing use of renewable resources for electricity sector (i.e., utility providers to supply 50 percent renewable electricity by 2030), doubling the energy efficiency savings at end uses, additional reductions from the Low Carbon Fuel Standard (LCFS), implementing the short-lived GHG strategy (e.g., hydrofluorocarbons), improved vehicle, truck and freight movement emissions standards, and strategies to reduce methane emissions from agricultural and other wastes by using it to meet our energy needs. The 2017 Scoping Plan also comprehensively addresses GHG emissions from natural and working lands of California, including the agriculture and forestry sectors.

The 2017 Scoping Plan also discusses the role of local governments in meeting the State's GHG reductions goals because local governments have jurisdiction and land use authority related to: community-scale planning and permitting processes, local codes and actions, outreach and education programs, and municipal operations. Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures (CARB 2017b, p. 97). The 2017 Scoping Plan encourages local governments to adopt Climate Action Plans to address local GHG emission sources.

Transportation Sector

In response to the transportation sector accounting for a large percentage of California's CO_2 emissions, AB 1493 (HSC Section 42823 and 43018.5), enacted in 2002, required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles whose primary use is non-commercial personal transportation manufactured in and after 2009. In setting these standards, CARB must consider cost-effectiveness, technological feasibility, economic impacts, and provide maximum flexibility to manufacturers. The federal CAA ordinarily preempts state regulation of motor vehicle emission standards; however, California is allowed to set its own standards with a federal CAA waiver from the EPA, which the EPA granted in 2009.

However, as discussed previously, the EPA and USDOT adopted federal standards for model year 2012 through 2016 light-duty vehicles. As such, California – and states adopting the California emissions standards (referred to as the Pavley standards) – agreed to defer to the national standard through model year 2016. The 2016 endpoint of the federal and state standards is similar, although the federal standard ramps up slightly more slowly than required under the state standard. The state standards require additional reductions in CO_2 emissions beyond model year 2016 (referred to as the Pavley Phase II standards). Also as noted above, the EPA and USDOT have adopted GHG emission standards for model year 2017 through 2025 vehicles. These standards are slightly different from the Pavley Phase II standards, but the State of California has agreed not to contest these standards, in part due to the fact that while the national standard would achieve slightly less reductions in California, it would achieve greater reductions nationally, and is stringent enough to meet state GHG emission reduction goals. In 2012, CARB adopted regulations that allow manufacturers to comply with the 2017 through 2025 national standards to meet state law.

In 2007, Executive Order S-01-07 mandated the following: establish a statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020; and adopt a LCFS for transportation fuels in California. CARB identified the LCFS as one of the nine discrete early actions in the Climate Change Scoping Plan. In 2009, the LCFS regulations were approved by CARB and established a reduction in the carbon intensity of transportation fuels by 10 percent by 2020. beginning in 2011. In 2015, CARB approved the re-adoption of the LCFS, which became effective beginning January 2016, to address procedural deficiencies in the way the original regulation was adopted.

Land Use and Transportation Planning

In 2008, SB 375 (Chapter 728, Statutes of 2008) established mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Under SB 375, CARB is required, in consultation with the state's metropolitan planning organization (MPOs), to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. In 2011, CARB adopted the final GHG emissions reduction targets for SCAG, which is the MPO for the region in which the City of Santa Monica is located (CARB 2011). The target is a per capita reduction of 8 percent for 2020 and 13 percent for 2035, both compared to the 2005 baseline. The proposed reduction targets explicitly exclude emission reductions expected from the AB 1493 and the LCFS regulations.

Under SB 375, the reduction target must be incorporated within that region's Regional Transportation Plan (RTP), which is used for long-term transportation planning, in a Sustainable Communities Strategy (SCS). Certain transportation planning and programming activities would then need to be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plan) are not required to be consistent with either the RTP or SCS.

Energy Sector

In 1978, the CEC first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standards. The standards are updated periodically (typically every three years) to allow for the consideration and inclusion of new energy efficiency technologies and methods.

Part 11 of Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality" (CBSC 2010). Since 2011, the CALGreen Code is mandatory for all new buildings constructed in the state, which establishes mandatory measures for new residential and non-residential buildings including energy efficiency, water conservation, material conservation, planning and design and overall environmental quality (CBSC 2010). The CALGreen Code was last updated in 2016 to include new mandatory measures for residential and nonresidential uses; the new measures took effect January 2017 (CSBC 2017).

The State has adopted regulations to increase the proportion of electricity from renewable sources. In 2008, Executive Order S-14-08 (COG 2008) expanded the State's RPS to 33 percent renewable power by 2020. In 2011, SB X1-2 increased California's Renewables Portfolio Standard to 33 percent by 2020. SB 350 (Chapter 547, Statues of 2015) further increased the Renewables Portfolio Standard to 50 percent by 2030, including interim targets of 40 percent by 2024 and 45 percent by 2027. In 2018, SB 100 further increased California's Renewables Portfolio Standard and requires retail sellers and local publicly-owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by the end of 2024, 52 percent by the end of 2027, and 60 percent by the end of 2030; and requires that CARB should plan for 100 percent eligible renewable energy resources and zero-carbon resources by the end of 2045.

Cap-and-Trade Program

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as a key strategy CARB will employ to help California meet its goal of reducing GHG emissions to 1990 levels by the year 2020, 40 percent below 1990 level by the year 2030, and ultimately achieve an 80 percent reduction from 1990 levels by 2050. Under Cap-and-Trade, an overall limit is established for GHG emissions

from capped sectors (e.g., electricity generation, petroleum refining, cement production, and industrial facilities that emit more than 25,000 metric tons CO_2e per year) and declines over time, and facilities subject to the cap can trade permits to emit GHGs.

The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. Since 2015, fuels, such as gasoline, diesel, and natural gas, have been covered under the Cap-and-Trade Program. Fuel suppliers are required to reduce GHG emissions by supplying low carbon fuels or purchasing pollution permits, called "allowances," to cover the GHGs produced when the conventional petroleum-based fuel they supply is combusted. (CARB 2014) While the Cap-and-Trade Program is not directly applicable to the Project, the Program is indirectly related as it is applicable to sources of emissions associated with the Project.

4.8.3.3 Regional

South Coast Air Quality Management District

As discussed in Section 4.2, *Air Quality*, SCAQMD is responsible for air quality planning in the South Coast Air Basin (where the Project Site is located) and developing rules and regulations to bring the Air Basin into attainment of the ambient air quality standards. As part of its efforts to reduce local air pollution, SCAQMD has promoted a number of programs to combat climate change. For instance, SCAQMD has promoted energy conservation, low-carbon fuel technologies (natural gas vehicles; electric-hybrids, hydraulic-hybrids, and battery-electric vehicles), renewable energy, vehicle miles traveled (VMT) reduction programs, and market incentive programs

SCAQMD's first formal action in addressing climate change was the adoption of the "Policy on Global Warming and Stratospheric Ozone Depletion" on April 6, 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the Air Quality Management Plan. In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy to include the following directives:

- Phase-out the use and corresponding emissions of chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;
- Phase-out the large quantity use and corresponding emissions of hydrochlorofluorocarbons by the year 2000;
- Develop recycling regulations for hydrochlorofluorocarbons (e.g., SCAQMD Rules 1411 and 1415);
- Develop an emissions inventory and control strategy for methyl bromide; and
- Support the adoption of a California GHG emission reduction goal.

Additionally, in September 2011, the SCAQMD Governing Board adopted the Air Quality-Related Energy Policy, which integrates air quality, energy, and climate change issues in a coordinated and consolidated manner. The policy promotes amongst other things, zero and near-zero emission technologies and demand side management programs to manage energy demand.

SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

In 2016, SCAG adopted the 2016 RTP/SCS that demonstrates how the region will meet the GHG emission targets set forth by CARB. Using growth forecasts and economic trends, the 2016 RTP/SCS provides a vision for land use and transportation throughout the region for the next 25 years. The 2016 RTP/SCS considers the role of integrated land use and transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs. The 2016 RTP/SCS successfully achieves and exceeds the GHG emission-reduction targets set by CARB by demonstrating an 8 percent reduction by 2020, 18 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level on a per capita basis (SCAG 2016). Compliance with and implementation of 2016 RTP/SCS policies and strategies would have co-benefits of reducing per capita criteria air pollutant emissions associated with reduced per capita vehicle miles traveled (VMT).

SCAG's 2016 RTP/SCS provides specific strategies for successful implementation. These strategies include supporting projects that encourage a diverse job opportunities for a variety of skills and education, recreation and cultures and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles. In addition, the 2016 RTP/SCS includes new strategies to promote active transportation, supports local planning and projects that serve short trips, expand understanding and consideration of public health in the development of local plans and projects, and supports improvements in sidewalk quality, local bike networks, and neighborhood mobility areas. The 2016 RTP/SCS also proposes increasing access to the California Coast Trail, light rail and bus stations, and promoting corridors that support biking and walking, such as through a regional greenway network and local bike networks. The 2016 RTP/SCS proposes to better align active transportation investments with land use and transportation strategies, increase competitiveness of local agencies for federal and state funding, and to expand the potential for all people to use active transportation.

4.8.3.4 Local

City of Santa Monica Sustainable City Plan

The City's Sustainable City Plan (SCP) provides Citywide goals and strategies that promote sustainability, inclusive of reducing GHG emissions. It includes nine goal areas that cover a range of environmental, economic and cultural activities. Of these, four goal areas are particularly relevant to the City's goal in reducing GHG emissions: Resource Conservation, Environmental and Public Health, Transportation and Open Space and Land Use. Two of these, Transportation and Open Space/Land Use, address the overall arrangement of development in the City. These topics are addressed further in the discussion of LUCE policies below and in Section 4.11, *Land Use and Planning*, of this EIR.

The City's SCP 2014 update includes targets of reducing GHG emissions by 20 percent below 1990 levels Citywide by 2020, by 30 percent below 1990 levels for corporate operations by 2020, by 40 percent below 1990 levels by 2030, and by 80 percent below 1990 levels by 2050. As discussed previously, total emissions for the City in 2015 were approximately 19.9 percent below the City's 1990 emissions total, which essentially meets the City's 2020 goal of 20 percent below 1990 levels. For the 2030 target (40 percent below 1990 levels), this equates to an emissions level of 831,984 $MTCO_2e$ (40 percent below 1,386,640 $MTCO_2e$). The SCP anticipates most reductions will come from increased energy efficiency, increased renewable energy production, and reduced transportation-related emissions through increased use of alternative transportation.

City of Santa Monica Climate Action and Adaptation Plan

In May 2019, the City adopted the Climate Action and Adaptation Plan (CAAP). The CAAP provides the roadmap for the City to achieve carbon neutrality by 2050 and to prepare and adapt for climate change impacts. The CAAP focuses on eight Citywide objectives in three sectors: zero net carbon buildings, zero waste and sustainable mobility. The CAAP also lays out a framework for increasing Santa Monica's resilience to climate change through four sectors: Climate Ready Community, Water Self-Sufficiency, Coastal Flooding Preparedness and Low Carbon Food & Ecosystems. The CAAP identifies areas in local government, community building and support to augment by including climate change considerations and adaptation measures.

The intent of the CAAP is to provide overarching policy direction with respect to climate change through Citywide objectives and broad strategies to reduce GHG emissions. The CAAP is not a regulatory plan to be applied on a project by project basis. Rather, the City recognizes that GHG reduction goals cannot be achieved by individual projects alone, but instead requires a comprehensive Citywide approach that would include the enactment of future plans, changes to existing ordinances, and an integrated and sustainable approach to land use/transportation planning.

City of Santa Monica General Plan Land Use and Circulation Element (LUCE)

The LUCE is intended to achieve a sustainable and integrated system of land use and transportation with the City. Its goals and policies provide the structure and tools to achieve many of the goals of the SCP by translating them into land use policy and direction. The LUCE includes a variety of strategies to reduce Citywide GHG emissions, energy use, water use, and solid waste generation.

Among other features, the LUCE includes a number of goals and policies that address the overall arrangement of development in the City, creating a land use pattern that reduces vehicle miles traveled. It includes within its Citywide Land Use Policies, goals and policies specific to reductions in GHG emissions. Further, Chapter 3.1 addresses Sustainability and Climate Change and includes therein 10 additional goals with related policies that further address issues pertaining to reductions in the generation of GHGs. LUCE goals and policies that are pertinent to the impacts of the Project are identified in the policy consistency analysis in the discussion of impacts of the Project below.

Santa Monica Municipal Code

The City's Green Building Ordinance, incorporated into the Santa Monica Municipal Code (SMMC) within Sections 8.36 and 8.106, provide a set of green building requirements for new public and private sector buildings that address energy efficiency (requiring that on average new

buildings be approximately 10 percent and 15 percent more efficient than state law requires), with requirements for solar energy use and provisions for electric vehicle charging capacity. Further, Section 8.108 includes requirements for energy efficient landscaping and water conservation; and construction and demolition (C&D) waste recycling, with a required diversion rate for C&D waste of 70 percent.

The SMMC also includes requirements for individual development projects to support alternative modes of transportation, thereby, reducing VMT and associated GHG emissions. Specially, Section 9.53, of the SMMC establishes the City's Transportation Demand Management (TDM) Ordinance, which requires the development of TDM Plans for individual projects/employers and payment of TDM fees to support City efforts for reducing vehicle trips and VMT. (see Section 4.17 *Transportation,* of this EIR for further discussion).

4.8.4 Environmental Impacts

4.8.4.1 Thresholds of Significance

Appendix G of the CEQA Guidelines provides the following screening questions to assist lead agencies when assessing a project's potential impacts with regard to GHG emissions:

Would the project:

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

b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

The State CEQA Guidelines does not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including by looking to thresholds developed by other public agencies, such as air districts, or suggested by other experts, such as CAPCOA, so long as any threshold chosen is supported by substantial evidence (see Section 15064.7(c)). A lead agency may also use thresholds on a case-by-case basis. (Id., subd. (b).) Each case must be analyzed in light of its own facts and circumstances.

Even in the absence of clearly defined thresholds for GHG emissions, the law requires that an agency makes a good faith effort to disclose the GHG emissions from a project and mitigate to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact. Regardless of which threshold(s) are used, the agency must support its analysis and significance determination with substantial evidence. (CEQA Guidelines, § 15064.7.) The CEQA Guidelines recommends considering certain factors, among others, when determining the significance of a project's GHG emissions, including the extent to which the project may increase or reduce GHG emissions as compared to the existing environment; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective" (CAPCOA 2008). Due to

the complex physical, chemical and atmospheric mechanisms involved in global climate change, there is no basis for concluding that a single project's increase in annual GHG emissions would cause a measurable change in global GHG emissions necessary to influence global climate change. Section 15064.4(b) of the CEQA Guidelines states that "in determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonable foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions."

In a recent document entitled Draft Discussion: CEQA and Climate Change paper, the Governor's Office of Planning and Research (OPR) has described some of the methods that a lead agency may use in selecting the appropriate threshold below which the lead agency may find an impact is less than significant. This includes:

- Efficiency Based Threshold – An efficiency metric (rather than an absolute number) would compare projects of various types, sizes, and locations equally, and determine whether a project is consistent with the State's reduction goals. For example, an efficiency metric for a residential project can be expressed on a per capita basis, and a metric for an office project can be expressed on a per employee basis.
- Compliance with State Goals and Percentage Reduction from BAU Emissions
- Consistency with Relevant Regulations, Plans, Policies, and Regulatory Programs
- Absolute Numerical/Quantitative Threshold

Although the Project's GHG emissions have been quantified as discussed under the Methodology section below, neither CARB, SCAQMD, nor the City has adopted quantitative project-level significance thresholds for assessing impacts related to GHG emissions applicable to the Project. In the absence of any adopted quantitative threshold, the determination of whether or not the proposed project would result in a cumulatively considerable contribution to the cumulative impacts of global climate change is based on the following:

- If the Project would conflict with (and thereby be consistent with) the applicable regulatory plans and policies to reduce GHG emissions, which include the emissions reduction measures included within CARB's Climate Change Scoping Plan; SCAG's 2016-2040 RTP/SCS; and the City's SCP, CAAP, Green Building and Energy Code, and the LUCE.

Per State *CEQA Guidelines* Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project (CCR, Title 14, Section 15064(h)(3)). To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency (CCR, Title 14, Section 15064(h)(3)). Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat

conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions" (CCR, Title 14, Section 15064(h)(3)).

Thus, State *CEQA Guidelines* Section 15064(h)(3) allows a Lead Agency to make a finding of non-significance for GHG emissions if a project complies with a program and/or other regulatory schemes to reduce GHG emissions.[2]

4.8.4.2 Methodology

With respect to GHG emissions, the CEQA Guidelines state in CCR Section 15064.4(a) that lead agencies should "make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The CEQA Guidelines note that a lead agency shall have the discretion to "quantify the GHG emissions from a project, and/or rely on a qualitative analysis or other performance based standards" (14 CCR 15064.4(a)).

Consistent with existing CEQA practice, Section 15064.4 gives lead agencies the discretion to determine whether to assess the significance of GHG emissions quantitatively or qualitatively. Under either approach, the lead agency's analysis must demonstrate a good-faith effort to disclose the amount and significance of greenhouse gas emissions resulting from a project, based to the extent possible on scientific and factual data. (CEQA Guidelines, § 15064.4, subd. (a).) In its CEQA review of projects, the City of Santa Monica has chosen to provide both a quantitative and qualitative GHG analysis for full disclosure. The methodology of analyzing the Project's GHG emissions, that may result from the construction and operations of the Project, is conducted as follows.

Project Net GHG Emissions Estimates

The Climate Action Registry General Reporting Protocol provides procedures and guidelines for calculating and reporting GHG emissions from general and industry-specific activities. Although no numerical thresholds of significance have been adopted, and no specific protocols are available for land use projects, the General Reporting Protocol provides a framework for calculating and reporting GHG emissions from the Project. The GHG emissions provided in this report are consistent with the General Reporting Protocol framework. For the purposes of this EIR, total GHG emissions (i.e., construction and operation) from the Project were quantified to provide information to decision makers and the public regarding the level of the Project's annual GHG emissions. GHG

[2] See, for example, San Joaquin Valley Air Pollution Control District (SJVAPCD), CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR-2025 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA…" Furthermore, the SCAQMD has taken this position in CEQA documents it has produced as a Lead Agency. The SCAQMD has prepared 3 Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 $MTCO_2e$/yr significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See SCAQMD, Final Negative Declaration for Ultramar Inc. Wilmington Refinery Cogeneration Project, SHC No. 2012041014 (October 2014); SCAQMD Final Negative Declaration for Phillips 99 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014); SCAQMD Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014); and SCAQMD Final Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (August 2015).

emissions are typically separated into three categories that reflect different aspects of ownership or control over emissions:

- Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).
- Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy.[3]

The Project would generate Project-related GHG emissions from on-road mobile vehicles, electricity, and natural gas, resulting in net GHG operational emissions, and indirect project GHG emissions from water conveyance, wastewater generation, and solid waste handling. In addition, Project construction activities such as demolition, hauling, and construction worker trips would generate GHG emissions. Since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions are calculated on an annual basis.

As previously noted, existing uses on the Project Site include medical office and facilities, and residential buildings. These current uses generate GHG emissions from the operation of the existing on-site buildings. Therefore, to calculate Project net GHG emissions, existing Project Site GHG emissions are subtracted from Project GHG emissions.

GHG emissions are estimated using the California Emissions Estimator Model (CalEEMod), which is a statewide land use emission computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions from a variety of land us projects. CalEEMod was developed in collaboration with the air districts of California, and is recommended by SCAQMD. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California (CalEEMod 2017).

The quantification of GHGs from any project involves many uncertainties. For example, it is reasonable to assume that the future employees and visitors of the Project Site currently engage in similar activities (working, recreating, and driving) that generate GHG emissions. Newer construction materials and practices, future energy efficiency requirements, future mobile source emission standards, and advances in technology would likely reduce future levels of air pollutant emissions, including GHGs. However, the net effect is difficult to quantify due to the difficulty in predicting future standards and requirements. As such, the estimated net increase in emissions resulting from implementation of the Project is likely to be an over-estimation. These same uncertainties and assumptions exist throughout the accepted analytical methodologies for quantifying GHG emissions.

[3] Embodied energy includes energy required for water pumping and treatment for end-uses.

Construction Emissions

The Project consists of two phasing plan scenarios, Phasing Plan A and Phasing Plan B. Phasing Plan B provides a similar type and intensity of intensity of construction land uses as Plan A, but would be implemented with an alternative construction schedule. GHG emissions for both Phasing Plans were quantified with the same level of detail.

For construction emissions, the construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source emissions factors. The CalEEMod input values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the same construction phasing assumptions used in the air quality criteria pollutant analysis (see Section 4.2, *Air Quality*, of this EIR) to generate annual GHG emissions for each construction year. SCAQMD guidance, *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*, recognizes that construction-related GHG emissions from projects "occur over a relatively short-term period of time" and that "they contribute a relatively small portion of the overall lifetime project GHG emissions" (SCAQMD 2008). The guidance recommends that construction project GHG emissions should be "amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies" (SCAQMD 2008). Therefore, GHG emissions from Project construction have been amortized over the 30-year lifetime of the Project.

Operational Emissions

Operation of the Project would generate GHG emissions from on-site operations such as natural gas combustion for heating/cooking, landscaping equipment and the use of consumer products. GHG emissions would also be generated by Project-generated vehicle trips.

For operational emissions of GHG emissions by on-site operations, CalEEMod was used to estimate GHG emissions from natural gas, solid waste, water and wastewater, and landscaping equipment. Building natural gas usage rates are adjusted to account for 2019 Title 24 Building Energy Efficiency Standards which will become effective January 1, 2020 (and be applicable to the project's buildings).

In calculating mobile-source GHG emissions, emissions are estimated based on the predicted number of trips to and from the Project Site and the estimated vehicle miles traveled (VMT) determined in the Traffic Study for the Project (Appendix L). The trip estimates take into account trip reductions from Project land use characteristics including internal capture from co-locating commercial and residential uses on the Project Site, and from transit and pedestrian trips.

Since early 2019, the City receives its electricity from the Clean Power Alliance (CPA). The CPA buys electricity from renewable sources and partners with Southern California Edison to distribute electricity to residential and commercial customers throughout the City. The City has chosen 100 percent Green Power as a step to reaching carbon neutrality and all customers are defaulted to receive electricity from 100 percent renewable resources. Based on this, the Project would receive 100 percent of its electricity from renewable sources and GHG emissions associated with electricity production would be zero.

GHG emissions from solid waste disposal are also calculated using CalEEMod. The emissions are based on the City average waste factor of 4.2 pounds of solid waste per employee per day,[4] and the GHG emission factors for solid waste decomposition. The GHG emission factors, particularly for CH_4, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. The default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery) are statewide averages and are used in this assessment.

GHG emissions from water and wastewater are due to the required energy to supply, distribute and treat. Wastewater also results in emissions of GHGs from wastewater treatment systems. Emissions are calculated using CalEEMod and are based on the water usage rate for the land uses, the electrical intensity factors for water supply, treatment, and distribution and for wastewater treatment, the GHG emission factors for the electricity utility provider, and the emission factors for the wastewater treatment process. Refer to Section 4.19, *Water Supply*, of this EIR for the estimated water usage rate for the Project.

Other sources of GHG emissions from operation of the Project include equipment used to maintain landscaping, such as lawnmowers and trimmers. CalEEMod uses landscaping equipment GHG emission factors from the CARB OFFROAD model and the CARB *Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003)*. (CARB 2003)

The GHG emissions calculations incorporate GHG reductions from the Project Design Features (PDF) and sustainability measures, some of which are required by regulation, such as the City's Green Building Code (which requires new buildings to meet or exceed the 2019 Title 24 Building Standards Code). These PDF's are listed in subsection 4.8.4.3 Project Characteristics.

Project Consistency with GHG Reduction Plans

OPR's CEQA Guidelines encourage lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. Section 15183.5 of the CEQA Guidelines states that a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted mitigation program, or plan for the reduction of GHG emissions that includes the following elements:

- Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
- Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable;
- Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area;

[4] Waste disposal rates for the City are estimated at 0.31 tons per year per resident and 0.42 tons per employee from Zero Operations Plan.

- Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and
- Be adopted in a public process following environmental review.

CARB's Climate Change Scoping Plan (last updated in May 2014) provides strategies and recommendations for achieving the AB 32 target, and the California CAT Report provides recommendations for specific emission reduction strategies for reducing GHG emissions and reaching the targets established in AB 32 and Executive Order S-3-05

As previously stated, in May 2019, the City adopted the Climate Action and Adaptation Plan (CAAP). The intent of the CAAP is to provide overarching policy direction with respect to climate change through Citywide objectives and broad strategies to reduce GHG emissions. The CAAP is not a regulatory plan to be applied directly to individual development projects. Rather, the City recognizes that GHG reduction goals cannot be achieved by individual projects alone, but instead requires a comprehensive Citywide approach that would include the enactment of future plans, changes to existing ordinances, and an integrated and sustainable approach to land use/transportation planning. For this EIR, the analysis is focused on whether the proposed project would support, and not hinder, the Citywide objectives and goals of the CAAP

The City has also adopted the 2010 LUCE, SCP, and Green Building and Energy Reach Code that include goals, policies and actions for the purpose of reducing local GHG emissions. Thus, if the Project is consistent with these policies and regulations, it would result in a less than significant impact, because it would be consistent with the overarching State regulations on GHG reduction.

4.8.4.3 Project Characteristics

Land Use Characteristics

The Project would provide expansion and improvements of the Providence Saint John's Health Center Campus located in an urbanized area near existing off-site commercial (including medical) and multifamily residential buildings. The Project Site lies in close proximity to existing public transit services and other alternative modes of transportation thus resulting in reduced vehicle trips, VMT, and associated transportation-related emissions compared to a project without these characteristics. Development patterns that reduce VMT, reduce GHG emissions.

CAPCOA has provided guidance for accounting for emission reductions from land use development projects within its guidance document titled *Quantifying Greenhouse Gas Mitigation Measures.* The following discussion identifies the CAPCOA reduction allowances and the credits taken in this GHG analysis for reduced GHG emissions associated with the land use characteristics at Project Site.

- **Increased Density:** Increased density (i.e., persons, jobs, or dwelling units per unit area) reduces GHG emissions associated with transportation, as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies such

as enhanced transit services. This measure corresponds to CAPCOA guidance measure LUT-1 (CAPCOA 2010a).

According to the Project traffic impact analysis (Appendix __ of this EIR), Project trip generation estimates were developed primarily using locally-developed Santa Monica land use trip generation rates. Santa Monica is generally characterized by compact urban development, high levels of public transit service, walkable and bike-friendly streets, and employer-sponsored TDM programs. The unique local characteristics of Santa Monica (such as density, availability of transit, diversity of land uses) require the development of specific trip generation rates to estimate trips associated with land uses in Santa Monica. These Santa Monica-specific trip rates are more appropriate for estimating trip generation rather than standard Institute of Transportation Engineers rates which are more reflective of suburban locations. The Project trip generation rates for most of the proposed land uses are drawn from the *Santa Monica Travel Demand Forecasting Model Trip Generation Rates* including medical office and day care, residential, restaurant, and retail office uses (Fehr & Peers 2019). Therefore, LUT-1 is incorporated into the trip generation estimated for the Project.

- **Location Efficiency:** Location efficiency refers to the location of a project relative to the type of urban landscape, such as an urban area, compact infill, or suburban center. In general, compared to the statewide average, a project could realize VMT reductions up to 65 percent in an urban area, up to 30 percent in a compact infill area, or up to 10 percent in a suburban center for land use/location strategies.[5] This measure corresponds to CAPCOA guidance measure LUT-2 (CAPCOA 2010b). According to the CAPCOA guidance, factors that contribute to VMT reductions under this measure include the geographic location of a project within the region.

  The Project Site is located in the Mid-City District of Santa Monica. All Phase II Development Sites are located on the PSJHC Campus, as noted previously, which itself is located within the City's Healthcare Mixed-Use District in an area generally bounded by Arizona Avenue to the north, Broadway to the south, 20th Street to the west, and 23rd Street to the east. The Project Site is accessible to the regional transportation network, located approximately 0.9-mile north of the Santa Monica Freeway (Interstate 10) ramps at Cloverfield Boulevard. The Project Site is served by existing public transportation of a bus transit system located within a one-half-mile, the Expo Light Rail system within 0.8-mile, and 3 Breeze Bike Share Hubs within one-half mile. The location efficiency of the Project Site would reduce vehicle trips and VMT compared to the statewide and Air Basin average, and would result in corresponding reductions in transportation-related emissions. Therefore, LUT-2 is incorporated into the trip generation estimate for the Project.

- **Increased Land Use Diversity and Mixed-Uses:** Locating different types of land uses near one another can decrease VMT since vehicle trips between land use types are shorter and could be accommodated by alternative modes of transportation, such as public transit, bicycles, and

5 CalEEMod, by default, assumes that trip distances in the Air Basin are slightly longer than the statewide average. This is due to the fact that commute patterns in the Air Basin involve a substantial portion of the population commuting relatively far distances, which is documented in the Southern California Association of Governments 2016-2040 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). The RTP/SCS shows that, even under future Plan conditions, upwards of 50 percent of all work trips would be 10 miles or longer (SCAG, Performance Measures Appendix, p. 13, 2016). The RTP/SCS does not specify the current percentage of work trips greater than 10 miles in the region, but it can be assumed that the percentage is currently greater than 50 percent since the goal of the RTP/SCS is to reduce overall VMT in the region. It is thus reasonable to assume that the trip distances in Air Basin are analogous to the statewide average given that the default model trip distances in the Air Basin are slightly longer but still generally similar to the statewide average. Therefore, projects could achieve similar levels of VMT reduction (65 percent in an urban area, 30 percent in a compact infill area, or 10 percent for a suburban center) compared to the Air Basin average.

walking. This measure corresponds to CAPCOA guidance measure LUT-3 (CAPCOA 2010c). According to the CAPCOA guidance, factors that contribute to VMT reductions under this measure include the percentage of each land use type in the development.

The Project would locate complementary child & family development including daycare, residential, medical, and restaurant land uses near existing off-site commercial and residential uses. According to the Project traffic impact analysis, the Project trip rates reflect Santa Monica's compact urban development, high levels of public transit service, and walkable and bike-friendly streets (Fehr & Peers 2019). Therefore, LUT-3 is incorporated into the trip generation for the Project.

- **Increased Destination Accessibility:** This measure corresponds to CAPCOA guidance measure LUT-4 (CAPCOA 2010d). According to the CAPCOA guidance, factors that contribute to VMT reductions under this measure include the distance to downtown or major job center.

  The Project would be located in an area that offers access to multiple other nearby destinations including commercial, restaurant, entertainment, office, retail, and residential uses. The Project Site is also located near other medical job centers in the Mid-City area of Santa Monica. The access to multiple destinations in close proximity to the Project Site would reduce vehicle trips and VMT compared to the statewide and South Coast Air Basin average, encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in transportation-related emissions. Therefore, LUT-4 is incorporated into the trip generation for the Project.

- **Increased Transit Accessibility:** Locating a project with high density near transit services encourages the use of transit by people traveling to or from a project site. This measure corresponds to CAPCOA guidance measure LUT-5 (CAPCOA 2010e). According to the CAPCOA guidance, factors that contribute to VMT reductions under this measure include the distance to transit stations near the Project.

  The Project would be located within one-half-mile of public transportation, including a bus transit system located within a one-half-mile, the Expo Light Rail system within 0.8-mile, and Three Breeze Bike Share Hubs within one-half mile. The Project would provide access to on-site uses from existing pedestrian pathways, and provide parking for bicycles on-site to encourage utilization of alternative modes of transportation. The City of Santa Monica hosts a dense network of bicycle facilities including some immediately adjacent to the Project Site. Running adjacent to the Expo LRT, the Expo Line Bike Path is located near the Project Site and is a dedicated bike path, entirely separating bicyclists and other non-motorized users from vehicles on the street. The Project is also located near numerous Breeze Bike Share Hubs. The estimated Project trip generation reflect Santa Monica's compact urban development, high levels of public transit service, and walkable and bike-friendly streets (Fehr & Peers 2019Appendix _). Therefore, LUT-5 is incorporated into the trip generation for the Project.

- **Provide Pedestrian Network Improvements:** Providing pedestrian access that minimizes barriers and links a project site with existing or planned external streets encourages people to walk instead of drive. This measure corresponds to CAPCOA guidance measure SDT-1 (CAPCOA 2010f). According to the CAPCOA guidance, factors that contribute to VMT reductions under this measure include pedestrian access connectivity within the Project and to/from off-site destinations.

  As discussed in Chapter 2.0, *Project Description*, the Project would improve pedestrian connectivity and the pedestrian experience, in the Project area by connecting the various buildings within the North and South campuses of the PSJHC. The Project would include new

pedestrian friendly streets and pedestrian-oriented buildings within the Campus, encouraging PSJHC's users, visitors, and nearby residents and employees to occupy and enjoy the outdoor areas. New sidewalks and pedestrian paths would provide an inviting pedestrian realm that conveniently links buildings, plazas, and open space areas. An extensive Wellness Walk would weave through the PSJHC to create a pedestrian-friendly, integrated campus, and promote exercise, health, and wellness among visitors, patients, and staff. According to the Project traffic impact analysis, the Project trip rates reflect Santa Monica's compact urban development, high levels of public transit service, and walkable and bike-friendly streets" (Fehr & Peers 2019). Therefore, SDT-1 is assumed to be incorporated into the trip generation for the Project.

Project Design Features

The Project includes a number of Project Design Features (PDFs) to minimize their GHG emissions. The analysis of Air Quality impacts in Section 4.2, *Air Quality*, of this EIR provides three categories of PDFs that would minimize the amount of air pollutant emissions. The PDFs in two of the categories would also reduce GHG emissions. Those PDFs are listed below:

PDF-AQ-1: Demolition, Grading and Construction Activities:

1. Compliance with provisions of the SCAQMD District Rule 403. The Project shall comply with all applicable standards of the SCAQMD, including the following provisions of District Rule 403:

    a. All unpaved demolition and construction areas shall be wetted at least three times daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting a minimum of three times daily will reduce fugitive dust by 61 percent.
    b. The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
    c. All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
    d. All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
    e. All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
    f. General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
    g. Trucks having no current hauling activity shall not idle and be turned off.
    h. Ground cover in disturbed areas shall be replaced as quickly as possible.
    i. Cranes will be electric powered.

2. **Anti-Idling Regulation:** In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

3. **Fuel Requirements:** In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

4. **Architectural Coatings:** During construction of Phase II buildings, construction contractors shall comply with SCAQMD Rule 1113 and utilize architectural coatings that meet the VOC content requirements.

PDF-AQ-2: Green Building Features: At minimum, Phase II buildings will be designed and operated to meet the applicable requirements of the California Green Building Standards Code (CALGreen) and the City of Santa Monica Green Building Code at the time of building permit issuance. Green building features will include the following:

1. Waste

a. Construction contractors for Phase II development will implement a construction waste management plan (WMP) to divert a minimum of 70 percent of all mixed construction and demolition (C&D) debris to City certified construction and demolition waste processors, consistent with the City of Santa Monica Municipal Code Article 8, Chapter 8.108.

b. The Project will include easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics, metals, and landscaping debris (trimmings), consistent with Municipal Code, Section 9.21.130.

2. Energy

a. Phase II buildings will comply at minimum with the California 2019 Title 24 Building Energy Efficiency Standards or the most recent standards at the time of building permit issuance. Additionally, the Project will comply with the City of Santa Monica Green Building Code by incorporating solar water heating, green roofs, high-performance building envelopes, energy-efficient HVAC and lighting systems, thereby reducing energy use, air pollutant emissions, and GHG emissions.

b. Phase II buildings will include the installation of solar electric photovoltaic (PV) systems, as required by the City of Santa Monica Green Building Standards. At minimum, the PV systems will have a minimum total wattage of 2.0 times the square footage of the building footprint (2.0 watts per square foot).

c. The design of Phase II buildings will incorporate surface materials with a high solar-reflectance-index average, coupled with roof assemblies having insulation factors that meet the 2019 California Title 24 Building Energy Efficiency Standards or the most recent standards at the time of building permit issuance, to reduce unwanted heat absorption and minimize energy consumption. The Project would be designed to reduce energy consumption by 10 percent as required by the City's Energy Reach Code.

3. Transportation

a. Providence Saint John's will implement a Transportation Demand Management (TDM) Plan with measures to decrease vehicle miles traveled. The specific TDM strategies to be implemented by the developer shall be finalized as part of the Development Agreement process. It is anticipated that the following TDM

strategies will be implemented and/or maintained: a TDM Coordinator; Transportation Management Association (TMO); transit pass subsidies provided to employees by the Project Applicant; ridesharing (carpools and vanpools); parking pricing; Guaranteed Ride Home (GRH); bicycle facilities; carshare service; bicycle sharing areas; transportation information center and TDM website information; pedestrian wayfinding signage; and commuter club.

b. To encourage carpooling and the use of electric vehicles by Project employees and visitors, designated parking for carpools and vanpools will be provided throughout the North and South Campuses in accordance with SMMC Section 9.28.150.

c. Electric Vehicle (EV) Charging Stations would be provided throughout the North and South Campuses. The total number of electric vehicle charging stations would be determined as part of the Development Agreement to be finalized; however, all Phase II Project facilities with more than 50 parking spaces would include at least two charging stations plus one for each additional 50 parking spaces consistent with SMMC Section 9.28160(B)(2).

d. Both long-term and short-term bicycle parking would be provided throughout the North and South Campuses. The number of parking spaces shall be provided in accordance with SMMC Table 9.28.140, which requires one short-term bicycle parking space for every 4,000 square feet of floor area (depending on the use). Upon full Phase II Project implementation, PSJHC shall have more than 60 new short-term bicycle parking spaces and 120 new long-term bicycle parking spaces added to its North Campus and more than 100 new short-term spaces and more than 200 new long-term spaces added to its South Campus. The Project would also dedicate five percent of non-residential parking for electric vehicles.

   Showers and clothes lockers for employees would also be provided throughout the North and South Campuses. In accordance with SMMC Section 9.28.170(B)(1), a minimum of two showers would be provided in Phase II Buildings 2C, 2D/E, 2I, and S1 while a minimum of four showers would be provided in Building S4. Consistent with SMMC Section 9.28.170(B)(2), lockers for clothing and other personal effects would be provided at a ratio of 75% of the long-term employee bicycle parking spaces required. Upon full Phase II Project implementation, PSJHC would have more than 90 new clothes lockers on its North Campus and more than 100 new clothes lockers on its South Campus.

4. Water

a. The Project would be designed to reduce indoor and outdoor water consumption as required by California 2019 Title 24 standards.

The above list of PDFs represents the minimum that would be included in the Project to reduce GHG pollutant emissions. More aggressive PDFs (such as greater EV charging spaces and/or bicycle parking) and/or additional measures to reduce air quality emissions may be incorporated as part of the final Development Agreement for the Phase II Master Plan. The DA process is on-going and final determination of additional features/measures (if any) will be determined at the time of project approval.

4.8.4.4 Project Impacts

GHG Emissions

Impact GHG-1*: Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?; or*

Impact GHG-2*: Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?*

Impact Statement GHG-1: The Project would generate direct and indirect GHG emissions from construction and operational activities. The Project would be consistent with applicable GHG reduction plans, and other applicable plans, policies and regulations adopted for the purpose of reducing the emissions of GHGs including the City's LUCE, Sustainable City Plan, and Climate Action and Adaptation Plan; AB32 and SB 375; and the State Attorney General, OPR and Climate Action Team recommendations. Therefore, the Project's GHG emissions and associated impacts would be less than significant.

Construction Emissions

Emissions of GHGs associated with construction of the Project were calculated for each year of construction activity using CalEEMod. Results of the GHG emissions calculations are presented in **Table 4.8-2**, *Estimated Construction Phasing Plan A Greenhouse Gas Emissions* and **Table 4.8-3**, *Estimated Construction Phasing Plan B Greenhouse Gas Emissions*. It should be noted that the GHG emissions shown in the tables are based on construction equipment operating continuously throughout the work day. Heavy duty equipment fleets and number of vehicle trips for Phasing Plan A and Phasing Plan B would be identical, however, differences in GHG emissions can be attributed to fluctuations in CalEEMod emission factors for each construction year and the equipment and vehicles operating in certain years. In reality, construction equipment tends to operate periodically or cyclically throughout the work day. Therefore, the GHG emissions shown reflect a conservative estimate. A complete listing of the equipment by phase, emission factors, and calculation parameters used in this analysis is included within the emissions calculation worksheets that are provided in Appendix G of this EIR.

As described above, SCAQMD recommends that construction-related GHG emissions be amortized over a project's 30-year lifetime in order to include these emissions as part of a project's annualized lifetime total emissions. In accordance with SCAQMD methodology, the estimated construction GHG emissions have been amortized over a 30-year lifetime period, and included in the annualized operational GHG emissions in the following section below.

TABLE 4.8-2
ESTIMATED CONSTRUCTION PHASING PLAN A GREENHOUSE GAS EMISSIONS

Year	CO_2e (Metric Tons) [a, b, c]
2021	354
2022	3,464
2023	1,026
2024	682
2025	1,477
2026	379
2027	515
2028	698
2029	510
2030	546
2031	760
2032	2,981
2033	674
2034	1,062
2035	1,288
2036	319
2037	239
2038	1,582
2039	380
2040	421
2041	281
Total	19,640
Amortized Emissions (30 years)	655

[a] Totals may not add up exactly due to rounding in the modeling calculations.

[b] CO_2e emissions are calculated using the global warming potential values from the Intergovernmental Panel on Climate Change Fourth Assessment Report: 25 for CH_4 and 298 for N_2O (Intergovernmental Panel on Climate Change, Fourth Assessment Report: The Physical Science Basis, Summary for Policy Makers, (2007))

SOURCE: ESA, 2019.

TABLE 4.8-3
ESTIMATED CONSTRUCTION PHASING PLAN B GREENHOUSE GAS EMISSIONS

Year	CO_2e (Metric Tons) [a, b, c]
2021	357
2022	236
2023	980
2024	569
2025	605
2026	2,109
2027	1,605
2028	1,042
2029	1,413
2030	332
2031	1,020
2032	2,976
2033	670
2034	1,059
2035	1,282
2036	317
2037	234
2038	1,569
2039	374
2040	413
2041	273
Total	19,436
Amortized Emissions (30 years)	648

[a] Totals may not add up exactly due to rounding in the modeling calculations.

[b] CO_2e emissions are calculated using the global warming potential values from the Intergovernmental Panel on Climate Change Fourth Assessment Report: 25 for CH_4 and 298 for N_2O (Intergovernmental Panel on Climate Change, Fourth Assessment Report: The Physical Science Basis, Summary for Policy Makers, (2007))

SOURCE: ESA, 2019.

Operational Emissions

The long-term operational GHG emissions of the Project were also estimated using CalEEMod. Maximum annual net GHG emissions resulting from motor vehicles, area, energy (i.e., electricity, natural gas), water conveyance, waste, and stationary sources, plus amortized construction emissions, and minus existing emissions, were calculated for the expected opening year of the Project's full buildout (2041), and shown in **Table 4.8-4**, *Annual Greenhouse Gas Emissions*.

TABLE 4.8-4
ANNUAL PROJECT GREENHOUSE GAS EMISSIONS

Emissions Sources (Opening Year 2041)	Project CO_2e (Metric Tons per Year) [a]
Area	1
Electricity[b]	0
Natural Gas	1,492
On Road Mobile Sources	9,059
Water Conveyance	317
Waste	110
Stationary	1,293
Construction (Amortized)	655
Total Proposed GHG Emissions	12,927
Existing GHG Emissions (minus)	2,571
Total Project GHG Emissions (net)	10,356

NOTES:
[a] Totals may not add up exactly due to rounding in the modeling calculations
[b] Project electricity will be generated from renewable sources, therefore, GHG emissions associated with electricity production would be zero.
SOURCE: ESA, 2019.

As shown in Table 4.8-4, the estimated annual Project GHG (net) emissions are estimated to be 10,356 $MTCO_2e$. [6] Project operational-related GHG emissions would decline in future years as emissions reductions from the State's Cap-and-Trade program are fully realized. As shown, the Project's greatest source of GHG emissions come from mobile sources. Reductions in mobile sources GHGs - would occur over the next decade, and beyond, ensuring that the Project's total GHG emissions would be further reduced. Emissions from mobile sources would decline in future year as older vehicles are replaced with newer vehicles resulting in a greater percentage of the vehicle fleet meeting more stringent combustion emissions standards, such as the model year 2017-2025 Pavley Phase II standards.

Project Consistency with City of Santa Monica Goals and Actions

The significance of the Project's GHG emissions has been evaluated based on whether the Project would be consistent with the City's relevant goals and actions that aim to reduce GHG emissions. The Project would implement Project Design Features addressing water conservation, energy conservation, waste reduction and sustainability consistent with the City's Green Building Code, the SCP, the CAAP, and the LUCE.

Project consistency with the SCP is shown in **Table 4.8-5**, *Consistency with Applicable City of Santa Monica Sustainable City Plan GHG Emissions Goals.* An analysis of how the Project supports, and doesn't hinder, the goals of the CAAP is provided in **Table 4.8-6**, *Consistency with*

6 Based on Section 4.14, *Population and Housing,* of this EIR, the Project would have a service population (residents plus employees) of 646. Based on this, the Project would result in 16 MTCO2e/SP for Buildout Year 2041. This is provided for information purposes only.

Applicable City of Santa Monica CAAP Goals. Project consistency with the LUCE policies is shown in **Table 4.8-7**, *Consistency with Applicable City of Santa Monica LUCE Policies.* Other LUCE policies that address the land use patterns of the City to reduce VMT are addressed in Section 4.11, *Land Use and Planning*, of this EIR.

TABLE 4.8-5
CONSISTENCY WITH APPLICABLE CITY OF SANTA MONICA SUSTAINABLE CITY PLAN GHG EMISSIONS GOALS

Goals	Analysis of Project Consistency
Resource Conservation	
Goal 1: Significantly decrease overall community consumption, specifically the consumption of non-local, non-renewable, non-recyclable and non-recycled materials, water, and energy and fuels. **Goal 3:** Within renewable limits, encourage the use of local, non-polluting, renewable and recycled resources (water, energy, and material resources).	**Consistent:** The Project's Phase II buildings would be designed and operated to meet the applicable requirements of CALGreen and the City of Santa Monica Green Building Code, which exceeds the State standards. The Project would include such features as solar panels, electric vehicle charging stations, LED lighting, and water-efficient equipment and plumbing infrastructure. It would also promote waste reduction with on-site recycling containers to support the city's recycling goal; and would divert at least 70 percent of construction and demolition material from landfills. Meeting these standards would reduce energy consumption and water consumption.
Environment and Public Health	
Goal 1: Protect and enhance environmental health and public health by minimizing and where possible eliminating the levels of pollutants entering the air, soil and water.	**Consistent:** The Project would incorporate numerous measures, actions, and design features to reduce GHG emissions, including a suite of green building measures (see PDF-AQ-2), construction measures (see PDF-AQ-1), VOC reduction (PDF-AQ-3), and additional actions to reduce emissions from construction activities, vehicle idling, fuel use, and other activities.
Transportation	
Goal 1: Create a multi-modal transportation system that minimizes and, where possible, eliminates pollution and motor vehicle congestion while ensuring safe mobility and access for all without compromising our ability to protect public health and safety **Goal 2:** Facilitate a reduction in automobile dependency in favor of affordable alternative, sustainable modes of travel.	**Consistent.** The Project would implement features that are supportive of efforts to create a multi-modal transportation system and to reduce vehicle miles traveled. The Project Site is served by existing public transportation of a bus transit system located within a one-half-mile, the Expo Light Rail system within 0.8-mile, and 3 Breeze Bike Share Hubs within one-half mile. The location of the Project Site would facilitate a reduction in vehicle trips and VMT compared to the statewide and Air Basin average, and would result in corresponding reductions in transportation-related GHG emissions. The Project would provide access to on-site uses from existing pedestrian pathways, and provide parking for bicycles on-site to encourage utilization of alternative modes of transportation. The City of Santa Monica has a dense network of bicycle facilities including some immediately adjacent to the Project site. Running adjacent to the Expo Light Rail system, the Expo Line Bike Path is located near the project and is a dedicated bike path, entirely separating bicyclists and other non-motorized users from vehicles on the street. These features would reduce work trips and encourage employees and residents to utilize alternative modes of transportation including public transportation, walking, and bicycling. The Project would also pay traffic impact fees and implement a transportation demand management plan (TDM) pursuant to SMMC Sections 9.53. The TDM plan would include measures to decrease vehicle miles traveled such as incentives for alternative transportation (public transportation, bicycling and walking), ride sharing, flexible work hours and possibilities for remote work that reduce peak hour trips. Specific details of the TDM plan will be determined at the time of project approval but will exceed the minimum requirements in the City's Transportation Demand Management Ordinance.

SOURCE: ESA, 2019

TABLE 4.8-6
CONSISTENCY WITH APPLICABLE CITY OF SANTA MONICA CAAP GOALS

Measure	Analysis of Project Consistency
Zero Net Carbon Buildings	
Measure: Achieve 100% renewable grid electricity.	**Consistent:** The Project will consume electricity from renewable sources, with the City's recent change to 100 percent Green Power as a step to reaching carbon neutrality.
Measure: Install 100 MW of local solar energy	**Consistent:** The Project will include the installation of solar electric photovoltaic (PV) systems, as required by the City of Santa Monica Green Building Standards. At minimum, the PV systems will have a minimum total wattage of 2.0 times the square footage of the building footprint (2.0 watts per square foot).
Measure: Reduce fossil fuel use 20% in existing buildings	**Consistent:** While initially the Project could result in increased natural gas demand compared to existing uses on each specific project site, the overall demand for natural gas over time is expected to decline due to increases in regional natural gas efficiencies and the transition to renewable energy on a statewide basis displacing fossil fuels including natural gas.
Measure: Discourage fossil fuels in new buildings	**Consistent:** The Project will incorporate measures such as the installation of PV systems that would improve energy efficiency beyond regulatory requirements, therefore, the Project would clearly reduce the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure.
Zero Waste	
Measure: Divert 95 percent of waste from landfills	**Consistent.** The Project would support this Citywide objective of achieving zero waste. The Project would incorporate waste diversion measures to increase recycling and minimize waste disposal, consistent with the City of Santa Monica Zero Waste Strategic Plan. These include implementing a construction waste management plan to divert 70 percent of all mixed construction and demolition debris to City certified construction and demolition waste processors, consistent with the City of Santa Monica Municipal Code Article 8, Chapter 8.108. During operation, the Project would provide easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics, metals, and landscaping debris (trimmings). Provision of on-site recycling containers and waste reduction programs would support the City's measure to divert waste from landfills.
Sustainable Mobility	
Measure: Convert 25% of commuter trips to transit.	**Consistent.** The Project would support this Citywide objective to convert commute trips to transit trips. Providence Saint John's will implement a Transportation Demand Management (TDM) Plan with measures to decrease vehicle miles traveled and increase average vehicle ridership (AVR). The TDM plan would include incentives for employees to use alternative transportation (public transit, bicycling and walking), car/ride sharing, flexible work hours and possibilities for remote work that reduce peak hour trips. Specific details of the TDM plan will be determined at the time of project approval but will exceed the minimum requirements in the City's Transportation Demand Management Ordinance. The Project would expand healthcare services and medical facilities in a transit priority area that is served by bus services provided by the Big Blue Bus and Metro. The PSJHC campus is located within walking distance of the Expo Rail Line Station at 17th Street/SMC and adjacent to existing pedestrian and bicycle facilities such as the Broadway bike lanes. The Project also would improve the pedestrian network with widened sidewalks along Santa Monica Boulevard and Broadway, new crosswalks and pedestrian overcrossings across Broadway and Santa Monica Boulevard, and new open space areas to encourage pedestrian activity throughout the Campus. The Project also includes

Measure	Analysis of Project Consistency
	new bicycle connections throughout the Campus that would link to the dedicated bicycle lanes on Broadway. These features would reduce work trips and encourage employees and residents to utilize alternative modes of transportation including public transportation, walking, and bicycling.
Measure: Convert 50% of local trips to foot, bike, scooter & skateboard	**Consistent.** The Project would support this Citywide objective to convert local vehicle trips to non-motorized trips. Specifically, the project would located a variety of uses in areas that are easily accessible via he City's existing bicycle network. Running adjacent to the South Campus, the Broadway bike lanes serve as a major east-west bicycle transportation corridor for the City. Both long-term and short-term bicycle parking would be provided throughout the North and South Campuses. Upon Project implementation, PSJHC would have more than 60 new short-term bicycle parking spaces and 120 new long-term bicycle parking spaces added to its North Campus and more than 100 new short-term spaces and more than 200 new long-term spaces added to its South Campus. New sidewalks and pedestrian paths would provide an inviting The Project also would improve the pedestrian network with widened and new sidewalks along Santa Monica Boulevard and Broadway and pedestrian paths to create an inviting pedestrian realm that conveniently links buildings, plazas, and open space areas. New crosswalks and pedestrian overcrossings across Broadway and Santa Monica Boulevard, and new open space areas would encourage pedestrian activity throughout the Campus. The Project would improve pedestrian connectivity and the pedestrian experience, and encourage PSJHC's users, visitors, and nearby residents and employees to occupy and enjoy the outdoor areas. An extensive Wellness Walk would weave through the PSJHC to create a pedestrian-friendly, integrated campus, and promote exercise, health, and wellness among visitors, patients, and staff. The Project also includes new bicycle connections throughout the Campus that would link to the dedicated bicycle lanes on Broadway.
Measure: Convert 50% of vehicles to electric or zero emission.	**Consistent.** The Project alone cannot control the market of electric vehicles. Nevertheless, to encourage the use of electric and zero emissions vehicles, Electric Vehicle (EV) Charging Stations would be provided throughout the North and South Campuses. The total number of electric vehicle charging stations would be determined as part of the Development Agreement to be finalized; however, all Phase II Project facilities with more than 50 parking spaces would provide include at least two charging stations plus one for each additional 50 parking spaces consistent with SMMC Section 9.28160(B)(2).

SOURCE: ESA, 2019.

TABLE 4.8-7
CONSISTENCY WITH APPLICABLE CITY OF SANTA MONICA LUCE POLICIES

Policies	Analysis of Project Consistency
Section 2.1 - Linking Land Use and Transportation Policy to Address Climate Change	
Goal LU2: Integrate Land Use and Transportation for Greenhouse Gas (GHG) Emission Reduction. Integrate land use and transportation, carefully focusing new development on transit rich boulevards and in the districts, to crate sustainable active pedestrian-friendly centers that decrease reliance on the automobile, increase walking, bicycling and transit use and improving community quality of live.	**Consistent.** This goal addresses overall land use patterns within the City. It includes a number of policies that are intended to direct growth away from residential neighborhoods and into areas served by transit. Such development contributes to reductions in VMT, and is implemented through Land Use policies and the SMMC. The Project is consistent with the Land Use policies and the SMMC, as discussed further in Section 4.11, *Land Use and Planning*. A number of features of the Project contribute to attainment of this goal and thus support reductions in the emission of GHGs. The Project Site is located in the Mid-City District of the City within one-half-mile of public transportation, including a bus transit system located within a one-half-mile, the Expo Light Rail system within 0.8-mile, and three Breeze Bike Share Hubs within one-half mile. The Project would provide access to on-site uses from existing pedestrian pathways, and provide parking for bicycles on-site to encourage utilization of alternative modes of transportation. The City of Santa Monica hosts a dense network of bicycle facilities including some immediately adjacent to the Project site. Running adjacent to the Expo LRT, the Expo Line Bike Path is located near the project and is a dedicated bike path, entirely separating bicyclists and other non-motorized users from vehicles on the street. According to the Project traffic study, the Project trip rates reflect Santa Monica's compact urban development, high levels of public transit service, and walkable and bike-friendly streets (Fehr & Peers 2019). Both long-term and short-term bicycle parking would be provided throughout the North and South Campuses. The number of bicycle parking spaces shall be provided in accordance with SMMC Table 9.28.140, which requires one short-term bicycle parking space for every 4,000 square feet of floor area (depending on the use). Upon full Phase II Project implementation, PSJHC would have more than 60 new short-term bicycle parking spaces and 120 new long-term bicycle parking spaces added to its North Campus and more than 100 new short-term spaces and more than 200 new long-term spaces added to its South Campus. These features would reduce work trips and encourage employees and residents to utilize alternative modes of transportation including public transportation, walking, and bicycling. Further, Providence Saint John's will implement a Transportation Demand Management (TDM) Plan with measures to decrease vehicle miles traveled. The TDM plan would include incentives for alternative transportation (public transportation, bicycling and walking), ride sharing, flexible work hours and possibilities for remote work that reduce peak hour trips. Specific details of the TDM plan will be determined at the time of project approval but will exceed the minimum requirements in the City's Transportation Demand Management Ordinance.
Section 3.1: Sustainability and Climate Change	
S1.1 Pro-actively cooperate with the State to implement AB 32, which calls for reducing GHG emissions to 1990 levels by 2020 and 80 percent below 1990 levels by 2050.	**Consistent.** The transit-oriented location as well as pedestrian friendly street level design demonstrates the Projects' support of AB 32. Additionally, the Project's location in the Mid-City District with commercial, retail, and restaurants further support reduction of GHG generated by unnecessary vehicle trips. (Also refer to Table 4.8-9, below.)

Policies	Analysis of Project Consistency
S1.3 Implement the LUCE policies to achieve the following GHG reduction targets as reflected in the Sustainable City Plan Goals: - Reduce community-wide GHG emissions to 15 percent below 1990 levels by 2015.	As described above, the City's CAAP was developed to meet the City's goal of carbon neutrality. As discussed in Table 4.8-7, the Project is consistent with the goals in the CAAP.
S2.1 Implement the VMT reduction policies of the Land Use and Circulation Element of the General Plan including, but not limited to: focusing new growth in mixed-use, transit-oriented districts; focusing new growth long existing corridors and nodes; supporting the creation of complete, walkable neighborhoods with goods and services within walking distance of most homes; and, promoting and supporting a wide range of pedestrian, bicycle and transit improvements in the City.	**Consistent**: See the analysis of Goal LU-2, above. As discussed therein, the Project is consistent with applicable policies of the LUCE. The Project is located in the Mid-City District of the City that is complementary to adjacent uses, numerous transit facilities, and bicycle and pedestrian facilities. These features have the potential to reduce work trips and encourage employees and residents to utilize alternative modes of transportation including public transportation, walking, and bicycling.
S2.2 In cooperation with the state and SCAG, proactively promote the implementation of SB 375, in particular utilizing its incentives for transit-oriented development. The City will also ensure that its local plans are consistent with the Sustainable Communities Strategy (SCS) plan requirement of SB 375.	**Consistent.** The Project would be consistent with SCAG RTP/SCS goals and objectives under SB 375 to implement "smart growth." The Project would provide medical commercial and residential development in close proximity to off-site job centers in Santa Monica where people can live and work and have access to convenient modes of transportation that provide options for reducing reliance on automobiles and minimizing associated air pollutant emissions. The Project would incorporate Project Design Features that would meet the applicable requirements of CALGreen, and the City's Green Building Code. The Project would also reduce VMT as a result of its urban infill location, with nearby access to off-site residential, retail, and restaurant use. As a result, the Project would provide people with convenient mobility options and a wide range of economic/employment opportunities.
S2.3 Advance the No Net New Trips goal in the Land Use and Circulation Element with TDM projects such as expanded rideshare programs, parking management strategies, as well as development impact fees for public transit infrastructure.	**Consistent.** The Project would be subject to the provisions of SMMC Section 9.53, and would implement a TDM plan and pay TDM fees to support City efforts for achieving the No Net New PM Trips Goal by 2030.
S3.1 Actively strive to implement the City's "zero net" electricity consumption goal by 2020 through a wide variety of programs and measures, including the generation of renewable energy in the City and energy efficiency measures.	**Consistent:** The Project would be designed and operated to meet the applicable requirements of CALGreen and the City's Green Building Code. As such, the Project will include the installation of solar electric photovoltaic (PV) systems, as required by the City of Santa Monica Green Building Standards. At minimum, the PV systems will have a minimum total wattage of 2.0 times the square footage of the building footprint (2.0 watts per square foot).
S3.2 Consider a requirement for all new residential buildings to use net zero energy by 2020 and all new commercial buildings by 2030.	
S4.1 Explore creating an ordinance to require solar installations, both photovoltaic and hot water, on new construction projects.	**Consistent:** The Project will include the installation of solar electric photovoltaic (PV) systems, as required by the City of Santa Monica Green Building Standards. At minimum, the PV systems will have a minimum total wattage of 2.0 times the square footage of the building footprint (2.0 watts per square foot).
S5.1 Continue to maintain a building code and prescriptive compliance options that meet or exceed state requirements for energy, water and other sustainability standards. Specifically, pursue California Energy Commission goals to achieve "zero net" energy buildings by 2020 for low-rise residential buildings and 2030 for commercial buildings and achieve a LEED-equivalent local building code by 2020.	**Consistent:** The Project would be designed and operated to meet the applicable requirements of CALGreen and the City's Green Building Code, which exceed State standards.

Policies	Analysis of Project Consistency
S5.6 Encourage cool roofs or green roofs on new buildings.	**Consistent:** The Project would be designed to incorporate surface materials with a high solar-reflectance-index average, coupled with roof assemblies having insulation factors that meet the 2019 California Title 24 Building Energy Efficiency Standards (or the most recent standards at time of building permit issuance) to reduce unwanted heat absorption and minimize energy consumption.
S5.8 Encourage installation of electrical outlets in loading zones and on the exterior of new buildings to reduce emissions from gas-powered landscape maintenance and operating refrigeration for delivery trucks.	**Consistent.** The Project would install electrical outlets for electrical landscaping equipment and delivery trucks as appropriate.
S6.3 Implement landscape water conservation requirements for new construction projects.	**Consistent.** As discussed in PDF-AQ-2, the Project would be designed to reduce indoor and outdoor water consumption as required by California 2019 Title 24 standards. (or the most recent standards at the time of building permit issuance). The Project would also comply with the City's Water-Efficient Landscape and Irrigation Standards, the City's LID requirements, and prepare an Urban Runoff Management Plan.
S8.1 Expand solid waste diversion strategies such as increased commercial recycling collection and outreach, expanded food waste collection, composting and waste to energy conversion programs.	**Consistent.** The Project would implement a construction waste management plan to divert 70 percent of all mixed construction and demolition debris to City certified construction and demolition waste processors, consistent with the SMMC Chapter 8.108. The Project would include easily accessible recycling containers and areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics, metals, and landscaping debris (trimmings), consistent with the City's Zero Waste Strategic Plan.

SOURCE: ESA, 2019.

As described in the above tables, the Project would comply with the Santa Monica Green Building Code to reduce GHG emissions by increasing energy-efficiency beyond requirements, reducing indoor and outdoor water demand, installing energy-efficient appliances and equipment, complying with 2019 California Title 24 Building Energy Efficiency Standards or the most recent standards at the time of building permit issuance. The Project is committed to meeting the mandatory measures of the CALGreen Code by incorporating strategies such as low-flow toilets, low-flow faucets, low-flow showers, and other energy and resource conservation measures. The heating, ventilation, and air conditioning (HVAC) system would be sized and designed in compliance with the CALGreen Code and the City's Green Building Program to maximize energy efficiency caused by heat loss and heat gain. The Project would also incorporate characteristics that would minimize transportation-related GHG emissions by locating Project-related jobs near off-site residential and commercial uses and within one-half-mile of high-quality transit including Big Blue Bus routes and the Metro Expo LRT, thereby encouraging alternative forms of transportation and pedestrian activity. These measures are consistent with the City's GHG reduction, sustainability, and smart-growth goals of improving energy and water efficiency in buildings, decreasing per-capita water use, using energy efficient appliances and equipment, and creating a more livable city.

Consistency with Statewide and Regional Mandates, Plans, Policies and Regulations

The primary focus of many of the statewide and regional mandates, plans, policies and regulations is to address worldwide climate change. Global GHG emissions, in their aggregate, contribute to climate change, not any single source of GHG emissions alone.

The significance of the Project's GHG emissions is also evaluated based on whether the Project is consistent with the relevant statewide and regional mandates, plans, policies and regulations to reduce GHG emissions including AB 32 and SB 32 (HSC Division 25.5), the SCAG 2016 RTP/SCS, and other statewide regulations and programs.

Because the Project incorporates physical and operational Project characteristics and Project Design Features that would promote a reduction in GHG emissions, the Project would not cumulatively contribute to significant climate change effects and would not conflict with the GHG reduction goals of HSC Division 25.5 and associated GHG reduction plans such as SCAG's 2016 RTP/SCS.

The Project's estimated VMT reductions would be consistent with regional plans to reduce transportation-related GHG emissions as part of the overall statewide strategy under AB 32 and SB 32 (HSC Division 25.5). Mobile source (transportation-related) GHG emissions are the largest sector of emissions from the Project (73 percent of total GHG emissions). This finding is consistent with the findings in many regional plans, such as the SCAG 2016 RTP/SCS, which recognizes that the transportation sector is the largest contributor to the State's GHG emissions. The purpose of the SCAG 2016 RTP/SCS is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG's Program EIR for the 2016 RTP/SCS, released in December 2015, states that "[e]ach [Metropolitan Planning Organization] is required to prepare an SCS in conjunction to [sic] with the RTP in order to meet these GHG emissions reduction targets by aligning transportation, land use, and housing strategies with respect to [Senate Bill] 375" (SCAG 2015a). SCAG's 2016 RTP/SCS plans for regional population growth using smart land use strategies. As part of the 2016 RTP/SCS, "transportation network improvements would be included, and more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth would be encouraged to accommodate increases in population, households, employment, and travel demand" (SCAG 2015b). Moreover, the 2016 RTP/SCS states that while "[p]opulation and job growth would induce land use change (development projects) and increase VMT, and would result in direct and indirect GHG emissions," the 2016 RTP/SCS would "supports sustainable growth through a more compact, infill, and walkable development pattern" (SCAG 2015c).

The Project would be consistent with and support the goals and benefits of the SCAG 2016 RTP/SCS, which seeks improved "mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them" (SCAG, 2012a). According to SCAG, incorporating "smart land use strategies encourages walking, biking, and transit use, and therefore reduces vehicular demand" and associated pollutants (SCAG, 2012b). Additionally, the SCAG 2016 RTP/SCS seeks better "placemaking," defined as "the process of developing options for locations where [people] can live and work that include a pleasant and convenient walking

environment that reduces their reliance on their car" (SCAG, 2012c). Consistent with SCAG's 2016 RTP/SCS alignment of transportation, land use, and housing strategies, the Project would place destinations closer together, encourage walking, biking, and transit uses, and would promote better place making. As discussed previously, the Project Site is within close proximity to jobs, housing, shopping and restaurant uses, and to existing public transit stops. The Project would locate new medical/healthcare and residential uses within close proximity to a diverse mix of uses.The Project Site is located in the walkable Mid-City District which is served by existing infrastructure and transit (including the extensive bus services and access to the Expo Rail Line) such that the Project would be expected to achieve substantial and credible reductions in trip distances and overall VMT. The density of housing, restaurants, shopping, and recreation amenities in the Mid-City District, combined with the plentiful bike lanes, pedestrian paths and public transportation options in the District, supports the RTP/SCS urban land use patterns that would promote transportation efficiency a. The Project would therefore be consistent with the SCAG 2016 RTP/SCS goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce vehicular demand and associated emissions. As such, the Project would be consistent with regional plans to reduce VMT and associated GHG emissions.

Table 4.8-8, *Consistency with Applicable State Greenhouse Gas Reduction Strategies*, contains a list of statewide GHG-reducing strategies potentially applicable to the Project. The analysis describes the consistency of the Project with these strategies that support the State's strategies in the 2017 Climate Change Scoping Plan to reduce GHG emissions. The 2017 Climate Change Scoping Plan relies on a broad array of GHG reduction strategies, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms, such as the Cap-and-Trade program. These potential strategies include increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting high speed rail and other alternative transportation options, and use of high efficiency appliances, water heaters, and HVAC systems (Energy + Environmental Economics 2015). The Project would benefit from statewide and utility-provider efforts towards increasing the portion of electricity provided from renewable resources. The Project would also benefit from statewide efforts towards increasing the fuel economy standards of vehicles. The Project would utilize energy efficiency appliances and equipment, as well as encourage the use of public transportation and electric-powered vehicles. While CARB is in the process of developing a framework for the 2030 reduction target in the Scoping Plan, the Project would support or not impede implementation of these potential reduction strategies identified by CARB.

TABLE 4.8-8
CONSISTENCY WITH APPLICABLE STATE GREENHOUSE GAS REDUCTION STRATEGIES

Sector/Source	Category / Description	Consistency Analysis
Energy		
California Renewables Portfolio Standard and SB 350 and SB 100	Increases the proportion of electricity from renewable sources to 33 percent renewable power by 2020. SB 350 requires 50 percent by 2030. It also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. SB 100 accelerates the RPS Program goals as follows: (1) 50 percent renewable resources target by December 31, 2026; and (2) 60 percent renewable resources target by December 31, 2030. SB 100 also establishes a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045.	**Consistent.** While this measure does not directly apply to the Project, the Project would be consistent with and would not conflict with this strategy because SCE is required to meet the State's Renewable Portfolio Standard, including SB 100. SCE would also be required to meet the 60 percent renewable target in 2030. Furthermore, the Project would receive 100 percent of its electricity from renewable energy sources under the City's agreement with the Clean Power Alliance and SCE.
CCR, Title 24	Energy Efficiency Standards for Residential and Nonresidential Buildings	Consistent. The Project's residential and non-residential buildings would meet or exceed the applicable City requirements and the CALGreen Code.
Assembly Bill 1109	The Lighting Efficiency and Toxics Reduction Act (AB1109) prohibits manufacturing specified general purpose lights that contain levels of hazardous substances prohibited by the European Union. AB 1109 also requires a reduction in average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting by 2018.	Consistent. While this action does not apply to individual projects, the Project would not conflict with this strategy because the Project would meet or exceed the applicable City requirements and the CALGreen Code.
SB 1368	Establishes an emissions performance standard for power plants within the State of California.	**Consistent.** The Project would be consistent with this regulation and would not conflict with implementation of the emissions standards for power plants.
California Green Building Standards Code Requirements	All bathroom exhaust fans shall be ENERGY STAR compliant.	**Consistent.** The Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in ASHRAE 90.1-2010, Appendix G and the Title 24 Building Energy Efficiency Standards.
	HVAC Systems will be designed to meet ASHRAE standards.	**Consistent.** The Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in ASHRAE 90.1-2010, Appendix G and the Title 24 Building Energy Efficiency Standards.
	Energy commissioning shall be performed for buildings larger than 10,000 square feet.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements.
	Air filtration systems are required to meet a minimum of MERV 8 or higher.	**Consistent.** The Project would meet or exceed this requirement as part of its compliance with the City's requirements, and the CALGreen Code.
	Refrigerants used in newly installed HVAC systems shall not contain any CFCs.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.

Sector/Source	Category / Description	Consistency Analysis
	Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces will be designed for such vehicles.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Long-term and short-term bike parking shall be provided for up to five percent of vehicle trips.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Stormwater Pollution Prevention Plan (SWPPP) required.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Indoor water usage must be reduced by 20% compared to current California Building Code Standards for maximum flow.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code
	All irrigation controllers must be installed with weather sensing or soil moisture sensors.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Wastewater usage shall be reduced by 20 percent compared to current California Building Standards.	**Consistent.** The Project would meet or exceed this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Requires a minimum of 50 percent recycle or reuse of nonhazardous construction and demolition debris.	**Consistent.** The Project would meet or exceed this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Requires documentation of types of waste recycled, diverted or reused.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Requires use of low VOC coatings consistent with AQMD Rule 1168.	**Consistent.** The Project would be consistent with this regulation and would meet or exceed the low VOC coating requirements.
	100 percent of vegetation, rocks, soils from land clearing shall be recycled or stockpiled on-site.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
Mobile Sources		
Mobile Source Strategy (Cleaner Technology and Fuels).	Reduce GHGs and other pollutants from the transportation sector through transition to zero-emission and low-emission vehicles, cleaner transit systems and reduction of vehicle miles traveled.	While this action does not apply to individual projects, the Project would be consistent and would not conflict with this strategy by supporting the use of zero-emission and low-emission vehicles. Furthermore, the Project would also reduce VMT as a result of its urban infill location, with access to public transportation within a quarter-mile of the Project Site and the Project would provide electric vehicle charging stations.
AB 1493 (Pavley Regulations)	Reduces greenhouse gas emissions in new passenger vehicles from model year 2012 through 2016 (Phase I) and model year 2017-2025 (Phase II). Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020.	**Consistent.** The Project would be consistent with this regulation and would not conflict with implementation of the vehicle emissions standards.
Low Carbon Fuel Standard (Executive Order S-01-07	Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels.	**Consistent.** The Project would be consistent with this regulation and would not conflict with implementation of the transportation fuel standards.
Advanced Clean Cars Program	In 2012, CARB adopted the Advanced Clean Cars (ACC) program to reduce criteria pollutants and GHG emissions for model year vehicles 2015 through 2025. ACC includes the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and	While this action does not apply to individual projects, all vehicles used by Project residents, employees, and visitors would not impact or conflict with implementation of the Advanced Clean Cars Program.

Sector/Source	Category / Description	Consistency Analysis
	fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.	
SB 375	SB 375 establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Under SB 375, CARB is required, in consultation with the state's Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035.	Consistent. While this measure does not directly apply to the Project, the Project would be consistent with and would not conflict with this strategy because the Project would be consistent with SCAG RTP/SCS goals and objectives under SB 375 to implement infill development and reduce regional VMT. The Project Site is located within a quarter mile of public transportation.
Water		
CCR, Title 24	Title 24 includes water efficiency requirements for new residential and non-residential uses.	**Consistent.** See discussion under California Green Building Standards Code Requirements above.
Senate Bill X7-7	The Water Conservation Act of 2009 sets an overall goal of reducing per capita urban water use by 20 percent by December 31, 2020. Each urban retail water supplier shall develop water use targets to meet this goal.	**Consistent.** See discussion under California Green Building Standards Code Requirements above.
Solid Waste		
California Integrated Waste Management Act (IWMA) of 1989 and Assembly Bill (AB) 341	The IWMA mandated that state agencies develop and implement an integrated waste management plan which outlines the steps to be taken to divert at least 50 percent of their solid waste from disposal facilities. AB 341 directs CalRecycle to develop and adopt regulations for mandatory commercial recycling and sets a statewide goal for 75 percent disposal reduction by the year 2020.	**Consistent:** While this action does not apply to individual projects, the Project would be served by a solid waste collection and recycling service, approved or licensed to collect solid waste in the City, that may include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with and would not conflict with Citywide recycling targets. The Project would incorporate sustainability waste diversion measures and performance standards to increase recycling and minimize waste disposal, consistent with the City of Santa Monica Zero Waste Strategic Plan. These include implementing a construction waste management plan to divert 70 percent of all mixed construction and demolition debris to City certified construction and demolition waste processors, consistent with the City of Santa Monica Municipal Code Article 8, Chapter 8.108. During operation, the Project would provide easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics, metals, and landscaping debris (trimmings). Provision of on-site recycling containers and waste reduction programs would support the City's measure to divert waste from landfills.
Climate Action Team	Reduce diesel-fueled commercial motor vehicle idling.	**Consistent.** The Project would comply with the CARB Air Toxics Control Measure to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time.
	Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Plant five million trees in urban areas by 2020 to effect climate change emission reductions.	**Consistent.** The Project would provide appropriate landscaping on the Project Site including vegetation and trees.

Sector/Source	Category / Description	Consistency Analysis
	Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	**Consistent.** The Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in ASHRAE 90.1-2010, Appendix G and the Title 24 Building Energy Efficiency Standards.
	Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/ commercial development along transit corridors, and implementing intelligent transportation systems.	**Consistent.** The Project would incorporate physical and operational Project characteristics that would reduce vehicle trips and VMT and encourage alternative modes of transportation for patrons and employees.
	Reduce energy use in private buildings.	**Consistent.** The Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in ASHRAE 90.1-2010, Appendix G and the Title 24 Building Energy Efficiency Standards.

SOURCE: ESA, 2018.

Consistency with Executive Orders B-30-15, B-55-18 and S-3-05

At the state level, Executive Orders S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. Executive Order S-3-05's goal to reduce GHG emissions to 1990 levels by 2020 was codified by the Legislature as the 2006 Global Warming Solutions Act (HSC Division 25.5). SB 32 codified the 2030 reduction target. Executive Order B-55-18 would further support reduction of GHG emissions with an ambitious statewide goal of reaching carbon neutrality no later than 2045.

According to the 2017 Scoping Plan, California is on track to meet its 2050 GHG reduction target as specified in S-3-05. The State's existing and proposed regulatory framework identified in the 2017 Scoping Plan can allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and puts the State on a trajectory to meet the target of reducing GHG emissions 80 percent below 1990 levels by 2050. According to the 2017 Scoping Plan, reductions needed to achieve the 2030 target are expected to be achieved by targeting specific emission sectors, including those sectors that are not directly controlled or influenced by the Project, but nonetheless contribute to Project-related GHG emissions. For instance, Project-related emissions would decline pursuant to the regulation as utility providers and transportation fuel producers are subject to renewable energy standards, Cap-and-Trade, and the LCFS.

The 2017 Scoping Plan also calls for the doubling of the energy efficiency savings, including demand-response flexibility for 10 percent of residential and commercial electric space heating, water heating, air conditioning and refrigeration. The strategy is in the process of being designed specifically to accommodate existing residential and commercial uses under the CEC's Existing Building Energy Efficiency Action Plan. (CEC 2016) This strategy requires the CEC in collaboration with the CPUC, to establish the framework for the energy savings target, outlining

the necessary actions that will need to occur in future years, including workforce education and training institutions engaging with the building industry, mapping industry priorities for efficiency to major occupations that will provide services, identifying workforce competency gaps, and quantifying the work needed to build a workforce to implement high-quality efficiency projects at scale. (CEC 2016)

Even though these studies did not provide an exact regulatory and technological roadmap to achieve 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study could allow the State to meet the 2050 targets.[7] (Energy + Environmental Economics 2015) For example, the 2017 Scoping Plan states some policies are not feasible at this time, such as Net Zero Carbon Buildings; however, this type of policy would be necessary to meet the 2050 target.

With statewide efforts underway to facilitate the State's achievement of those goals, it is reasonable to expect the Project's emissions level to decline as the regulatory initiatives identified by CARB in the 2017 Scoping Plan are implemented, and other technological innovations occur. The Project's emissions at buildout (2041) likely represent the maximum emissions for the Project as anticipated regulatory developments and technology advances are expected to reduce emissions associated with the Project, such as emissions related to electricity use and vehicle use. Given that the Project is consistent with the Scoping Plan, the RTP/SCS and the City's relevant plans and policies, and given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would be consistent with the Executive Order goals for 2030, 2045, and 2050. Therefore, the Project would be consistent with California's long-term GHG reduction goals, including Executive Orders B-30-15, B-55-18, and S-3-05.

For the reasons described above, the Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the establishment of the 2030 and 2050 targets.

In summary, the Project is consistent with applicable State, regional and City goals, plans, policies, and regulations for reducing GHG emissions. In addition, as discussed, the Project would minimize the GHG emissions relative to the existing Project Site conditions by implementing Project Design Features to reduce energy use and incorporate water conservation, energy conservation, tree-planting, and other features consistent with the City's Green Building Code, the SCP, and the Climate Action and Adaptation Plan. Therefore, impacts would be less than significant.

[7] The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80% below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation, and electricity sectors.

4.8.4.5 Cumulative Impacts

Analysis of GHG emissions is cumulative in nature because impacts are caused by cumulative global emissions and; additionally, climate change impacts related to GHG emissions do not necessarily occur in the same area as the project is located. Given that the Project would generate GHG emissions consistent with applicable reduction plans and policies, and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant.

4.8.5 Mitigation Measures

The Project would result in less than significant impacts associated with GHG emissions. Therefore, no mitigation measures would be required.

4.8.6 Level of Significance After Mitigation

No mitigation measures are required; impacts would be less than significant.

4.9 Hazards and Hazardous Materials

4.9.1 Introduction

This section describes existing conditions related to hazards and hazardous materials and analyzes the potential for impacts due to implementation of the Project. The analysis is based on a June 28, 2018 Phase I Environmental Site Assessment (Phase I ESA) prepared by Pacific Environmental Company (PEC) for the Project, included as Appendix H of this EIR.

Hazardous materials are defined as substances with physical and chemical properties of flammability, corrosivity, reactivity, or toxicity, which may pose a threat to human health or the environment. The term "hazardous materials" is used in this EIR to describe chemicals such as petroleum products, solvents, pesticides, herbicides, paints, metals, asbestos, and other regulated materials. Additionally, the term "release" as used in this section includes known historical spills, leaks, illegal dumping, or other discharges of hazardous materials to soil, sediment, groundwater, or surface water. Areas where historical releases of hazardous materials have occurred could pose a risk to public health and the environment.

Hazards may include exposure to both natural and man-made hazards. These could include hazards associated with aircraft operations at nearby airports or natural hazards such as wildfires.

Issues related to hazardous materials and hazards are addressed in other sections of this EIR as follows: toxic air contaminants (TACs) and particulate matter (PM), are addressed in Section 4.2, *Air Quality*; geologic hazards, such as earthquakes, landslides and bluff stability are addressed in Section 4.7, *Geology and Soils*; fire hazards are discussed in Section 4.16, *Fire Protection; and* hazards related to flooding and water quality are addressed in Section 4.23, *Stormwater*.

4.9.2 Environmental Setting

4.9.2.1 Existing Conditions

As discussed in depth in Chapter 2, *Project Description*, of this EIR, the Project Site totals approximately 407,100 sf within the greater PSJHC Campus and encompasses nine Phase II Development Sites. The existing land uses within and adjacent to the Project Site are listed in **Table 4.9-1**, *Existing Uses on the Project Site*. The existing land uses within the Project Site include existing buildings associated with PSJHC (e.g., Child & Family Development Center and associated pool house, Providence Saint John's Foundation [SJF] Building, John Wayne Cancer Institute [JWCI] Building), two temporary magnetic resonance imaging [MRI] modular buildings, a 10-unit vacant apartment building, Mullin Plaza, four named surface parking lots (Lots B, C, H, and I), and several un-named surface parking lots. Refer to Figures 2-2 and 2-3 in Chapter 2, *Project Description*, for illustrations of the existing and proposed uses within the Project Site.

The area around the Project Site and greater PSJHC Campus is developed with a mix of uses, including commercial and healthcare oriented businesses along with residential development on surrounding secondary streets. Along Santa Monica Boulevard, there are several medical office buildings and service oriented businesses. Most of the housing in the vicinity is multi-family.

TABLE 4.9-1
EXISTING USES ON THE PROJECT SITE

Development Site #	Use	Address	Assessor Parcel Number
2I	Child Family Development Center[a]	1339 20th St.	4276-027-018
2C	West Lot & Mullin Plaza	1328 22nd St.	SW Portion of 4276-027-018
2D/E	Lot C	1347 22nd St. & 2121 Santa Monica Blvd.	4276-035-003, 032 & 041
2D/E	Saint Johns Foundation (SJF) Building	2221 Santa Monica Blvd.	4276-025-042
S3	Temporary Modular MRI Buildings	2032-2042 Santa Monica Blvd.	4275-008-001 & 002
S1	Lot B	1414 21st St.	4275-008-017
S3	Lot I	No Address	4275-008-020
S4	JWCI Building	2200 Santa Monica Blvd.	4275-007-002
S4	10-Unit Vacant Apartments	1417 21st St.	4275-007-002
S5	Lot H	No Address	4275-007-001, 009, 4275-006-025, 026 & 028

[a] Includes associated pool house.

SOURCE: Pacific Environmental Company, Phase One Environmental Site Assessment, Providence St. John's Health Center Phase II Project, Santa Monica, CA 90404, June 28, 2018.

The Project Site lies at an average elevation of approximately 115 feet above mean sea level (MSL). The topography of the Project Site generally slopes gently down from the north to the south and southeast. Groundwater in the immediate vicinity of the Project Site reportedly flows to the southeast, and was encountered in on-site borings at depths of between 110 and 115 feet below the ground surface (bgs) (Wood 2018).

4.9.2.2 Historical Land Uses

On-Site

As part of the Phase I ESA, prior uses on the Project Site were documented. According to historical sources data in the Phase I ESA[1], the PSJHC Campus (including the Project Site) was historically developed with dwellings, a floral and nursery company and retail uses along Santa Monica Boulevard in the early 1900s. Records indicate that two on-site parcels (e.g., the current locations of the MRI Buildings (Site S3) and SJF Building (Site 2D/E)) were once occupied by service stations (e.g., gas) (one on each parcel).

The original hospital was established as an 89-bed facility in 1942 and, over the following 45 years, grew to 551 licensed beds with the addition of the South, East and West Wings that were added in the 1960s and 1970s, and an ambulatory care facility that opened in the late 1970s. As the Hospital expanded, it absorbed the surrounding residential properties.

[1] Historical sources reviewed included historical aerial photographs, historical Sandborn Fire Insurance Maps, historic phone directory records, historical building permits on file at the City of Santa Monica, historic topographic maps, and interviews with Hospital staff.

The Northridge Earthquake of 1994 caused substantial damage to the hospital. As a result, the original hospital tower was demolished in 1994 and repairs were made to the remaining structures within the PSJHC Campus. A reconstruction plan was finalized in 1997 that included the replacement of the hospital buildings with basic inpatient and outpatient facilities, with a long-term plan for the redevelopment of the Hospital owned properties on the southeast side of Santa Monica Boulevard (e.g., the majority of the Project Site). The new inpatient tower and adjoining Howard Keck Diagnostic & Treatment center were opened in 2005 and 2009, respectively, within the northern portion of the PSJHC Campus. The original hospital wings were demolished in 2010.

Table 4.9-2, *Existing and Historical Use of the Project Site*, identifies the approximate dates of construction of the existing buildings on, and the prior historical uses of, the Project Site according to building permits on file with the City of Santa Monica.

TABLE 4.9-2
EXISTING AND HISTORICAL USE OF THE PROJECT SITE

Development Site #	Use	Initial Date of Construction	Historical Use (by building permits issuance)
2I	Child Family Development Center[a]	1961	No building permits on file prior to 1961.
2C	West Lot & Mullin Plaza	--	Residential uses and nursery prior to 1942; hospital (w/basement central plant) 1942; hospital wings (w/basement central plant, cafeteria, gift shop, etc.) 1960s-1970s; ambulatory care facility late 1970s; all demolished 1994.
2D/E	Lot C	--	
2D/E	SJF Building	1970	Gas station (dates unknown); bank 1970-2015; converted to medical use 2015.
S3	Two MRI Modular Buildings	1999, 2003	Snack shop 1913; gas station (dates unknown); two restaurants 1970s-1995.
S1	Lot B	--	Medical office building 1960s; converted to school 1970s; demolished 1988.
S3	Lot I	--	
S4	JWCI Building	1952	No building permits on file prior to 1952.
S4	10-Unit Vacant Apartments	1947	Residential prior to 1947.
S5	Lot H	--	Residential prior to use as a parking lot

[a] Includes associated pool house.

SOURCE: ESA, March 2017. Based on information from Pacific Environmental Company, Phase One Environmental Site Assessment, Providence St. John's Health Center Phase II Project, Santa Monica, CA 90404, June 28, 2018.

Adjacent Off-Site

Records indicate that three off-site adjacent parcels (e.g., the current locations of a 4-story office building, Best Western Hotel, and 6-story office building located at the northwest, southeast, and northeast corners of the 20th Street/Santa Monica Boulevard intersection, respectively) were once occupied by service stations.

4.9.2.3 Site Reconnaissance Results

PEC conducted visits to the Project Site and surrounding area on February 7 and 15, 2017.

Interior Observations

On Site 2I, the Child Family Development Center (CFDC) and associated pool house resembles a small private school campus with classrooms, offices, play areas, and pool, and includes several single-story masonry structures; there were no indications of hazardous materials storage at this building.

On Site 2D/E, the SJF Building is a single-story office building; there are no hazardous materials stored or used at this building.

On Site S3, there are two temporary MRI modular buildings. The first MRI Building is a modular structure that was built as a temporary location for the Hospital's MRI equipment during the hospital replacement project; there were no indications of hazardous materials use or storage at this building. The second MRI Building is a modular building that was used for imaging during the construction of the new hospital. There were no indications of hazardous materials use or storage in this building during the site reconnaissance.

The JWCI Building on Site S4 is a two-story type III masonry building with partial basement for mechanical equipment constructed in 1952 as a medical and dental office building and currently used as a research facility with laboratories, offices and support space. There is a tissue and serum bank in the building where samples are stored in freezers that are cooled with liquid nitrogen. While no information was available regarding the other types of hazardous materials used and stored at the JWCI Building: (1) the use, storage and disposal of hazardous materials at this facility currently occurs in accordance with applicable regulations; and (2) during the site reconnaissance, there was no indications of leaking.

The vacant apartment building on Site S4 is a two-story, wood-framed, 10-unit multifamily residential structure with detached parking structure, which was constructed in 1948 and damaged during the Northridge Earthquake after which it was vacated. Asbestos and lead-based paint testing of the apartment building in 2008 confirmed the presence of asbestos containing materials (ACMs) and lead-based paint (LBP).

No evidence of ACMs or LPB was observed in the CFDC, SJF, or JWCI Buildings during the field reconnaissance; however, given the age of these buildings, the Phase I ESA concludes that these buildings could potentially contain ACM and/or LBP. The MRI buildings are temporary modular structures that were installed on the S3 Site in 1999 and 2003 and as such do not contain any ACM's or LBP.

Exterior Observations

The West Lot (Site 2C) contains four monitoring wells with at-grade access ports associated with the remediation efforts currently underway in connection with a former leaking underground storage tank (LUST) at the Saint John's Hospital Building site located immediately north of most of the Project Site. This issue is discussed further under "Regulatory Records Review" below.

Mechanical equipment adjacent to the MRI buildings includes water chillers and heating, air conditioning and ventilation system equipment on concrete pads. All of this equipment appeared in good working order, and there were no indications of staining or leaking below any of this equipment.

A backup generator is located northeast of the back entry to the JWCI Building. The generator is on a concrete pad and is enclosed in a metal structure. It is fueled by an 850-gallon above ground storage tank (AST) that is located in the same enclosure with secondary containment. A current permit to operate the generator and AST is posted inside the enclosure. However, there were no indications of leaking. However, it is noted that this AST does not appear in the regulatory hazardous materials database review conducted as part of the Phase I ESA for the Project (e.g., not listed in the California UST/AST database).

No hazardous substances or petroleum products in connection with identified uses at the Project Site were identified. There were no indications of storage tanks (other than the aforementioned backup generator AST), odors, pools of liquids, drums, hazardous substances, petroleum product containers, or unidentified substance containers identified on-site during the field reconnaissance. Furthermore, there were no indications of solid waste disposal, excessive staining, or stressed vegetation observed during the field reconnaissance that would indicate environmental concerns at the Project Site.

Electrical transformers and fluorescent lighting fixtures with ballasts manufactured prior to 1978 often utilize PCB-containing dielectric cooling fluids. PCBs are toxic environmental contaminants commonly associated with fluids in electrical equipment, including transformers and capacitors. Fluorescent lighting capacitors which do not contain PCB dielectric cooling fluids are generally identified by a label bearing the words “No PCBs”. No transformers, and no light fixtures or capacitors potentially containing PCBs, were observed on the Project Site during the field reconnaissance.

Adjacent Off-Site Observations

There were no indications of current activities or storage uses on the adjacent off-site properties observed during the field reconnaissance that would have an impact on the environmental conditions of the Project Site.

4.9.2.4 User Provided Information Results

The United States Environmental Protection Agency (USEPA) All Appropriate Inquiry (AAI) and ASTM E 1527-13 Phase I Standards require that the user conduct independent research and consider certain information before purchasing a property, including a title report, specialized knowledge from existing on-site personnel obtained through interviews, commonly known information, etc. According to the review in the Phase I ESA: (1) the Title documents do not identify any negative information (e.g., cleanup liens, activity and use limitations, etc.) that suggest that environmental conditions have been affected at the Project Site; and (2) the interviews, commonly known information, and a review of the Department of Toxic Substances Control [DTSC] EnviroStor Database, did not reveal any Recognized Environmental Conditions (RECs)

(discussed further below) or environmental liens associated with the Project Site other than the ongoing LUST clean-up discussed further below.

4.9.2.5 Regulatory Records Review

Standard Environmental Records Sources

Environmental Data Resources, Inc. (EDR) was contracted by PEC as part of the Phase I ESA to provide a search of regulatory databases and files belonging to federal, state, local and tribal environmental agencies associated with the existing and past use, generation, storage, treatment or disposal of hazardous materials, or release incidents of such materials, that may impact the Project Site. The records reviewed included, but were not limited to: Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS); National Priorities List (NPL); Resource Conservation Recovery Information System (RCRIS); Resource Conservation and Recovery Act – Small Quantity Generator (RCRA-SQG) and Large Quantity Generator (RCRA-LQG); Treatment, Storage and Disposal Facilities (TSD); Large and Small Quantity Generators; Emergency Response Incidence Logs; state-registered underground storage tanks (UST); California Statewide Environmental Evaluation and Planning System (CA SWEEPS UST); California Facility Inventory Database (CA-FID UST); state leaking underground storage tank (LUST) incident reports; state solid waste facilities/landfill sites (SWF/LS); and state hazardous waste sites (SHWS). The EDR records search is included as Appendix E of the Phase I ESA. A summary of the standard environmental records search findings is provided below.

On-Site

Table 4.9-3, *Hazardous Materials Database Listings at the Project Site*, identifies the hazardous materials database listings at the Project Site. As indicated therein, one or more of the Phase II Development Sites are listed in the RCRA SQG, CA CHIMRS, EDR HIST Auto, LUST, FINDs, CA EMI, ECHO, RCRA LQG, CA UST, SWEEPS UST, and CA HIST UST databases. Most of these listings are related to: the use/storage of hazardous materials or the generation of hazardous waste that are routine for normal hospital operations, rather than documented releases of hazardous materials. The exceptions include: (1) the former gas station sites at the current locations of the SJF Building (Site 2D/E) and MRI Buildings (Site S3) (e.g., EDR Hist Auto database listings) for which, although there are no documented releases of hazardous materials, these sites have not been previously evaluated to determine whether soil or water contamination has occurred; and (2) a sewage spill in 2008 which was cleaned up.

Adjacent Off-Site

Table 4.9-4, *Hazardous Materials Database Listings at Adjacent Off-Site Properties*, identifies the hazardous materials database listings at the adjacent off-site properties. This includes areas outside of the Project Site, but within the greater PSJHC Campus.

TABLE 4.9-3
HAZARDOUS MATERIALS DATABASE LISTINGS AT THE PROJECT SITE

Database	Location	Details	REC at the Project Site?
RCRA SQG	2221 Santa Monica Blvd.	Providence Saint John's Health Center listing for tracking of hazardous waste that is appropriately handled	No
CA CHMIRS	2221 Santa Monica Blvd.	2008 Lateral back up caused sewage spill, which was cleaned up.	No
EDR HIST	2227 Santa Monica Blvd.	Historical Gas Station listing for property now occupied by SJF Building	Yes
CA EMI	2042 Santa Monica Blvd.	Café Santa Monica, Naylor Brothers, emissions permits for restaurant operations in the 1990s	No
EDR Hist Auto	2042 Santa Monica Blvd.	Palm Service Station directory listings for gas station in the 1920s and 1940s now occupied by MRI	Yes
RCRA SQG, FINDS, ECHO	2200 Santa Monica Blvd.	Medical Clinic Labs at JWCI Building generates waste that is appropriately handled	No
HAZNET	2200 Santa Monica Blvd.	JWCI Building listing for tracking of waste that is appropriately handled	No
RCRA LQG	1328 22nd Street	St. John's Hospital generates a large quantity of waste that is tracked from the Site. Inclusion in this database does not indicate an environmental condition as there are no violations reported.	No

Acronyms/Abbreviations:
REC = Recognized Environmental Condition
RCRA SQG = Resource Conservation and Recovery Act – Small Quantity Generator (SQG)
RCRA LQG = Resource Conservation and Recovery Act – Large Quantity Generator
CA CHMIRS= California Hazardous Material Incident Reporting System
EDR Historical Automobile Stations
CA EMI = California Emissions Inventory Database
FINDS = Facility Index System
ECHO = Enforcement and Compliance History Online
HAZNET = Hazardous Waste Information System

SOURCE: ESA, March 2017. Based on information from Pacific Environmental Company, Phase One Environmental Site Assessment, Providence St. John's Health Center Phase II Project, Santa Monica, CA 90404, June 28, 2018.

As indicated in Table 4.9-4, most of the adjacent off-site properties listings are related to the use/storage of hazardous materials or the generation of hazardous waste that are routine for normal hospital operations, rather than documented releases of hazardous materials. For example, Saint John's Hospital is listed in the RCRA-LQG, CA-FID UST, and CA SWEEPS UST databases. These listings are related to the generation of routine hazardous waste associated with normal hospital operations and the use of several USTs associated with the hospital back-up generators. However, the records search also indicates that Saint John's Hospital is listed as an Open LUST Cleanup Site. In 1978, three diesel USTs, including one 2,000-gallon and two 15,000-gallon fiberglass USTs, were installed west of the main hospital building near the loading docks. The three USTs were removed in April and May 2010. A field inspection performed during their removal found a stained opening along a seam at the end of the 2,000-gallon tank indicating that it had leaked in the past. The results of soil and groundwater assessment work confirmed that there is no soil contamination associated with the former USTs, but that there is associated light non-aqueous

TABLE 4.9-4
HAZARDOUS MATERIALS DATABASE LISTINGS AT ADJACENT OFF-SITE PROPERTIES

Database(s)	Listed Property/Address	Distance/ Direction from Project Site	Details	REC at the Project Site?
LUST, FINDS, RCRA SQG	2121 Santa Monica Blvd. (aka 1328 22nd Street)	Adjacent/North (within greater PSJHC Campus)	St. John's is seeking closure of an active LUST case at the Saint John's Hospital Building site in accordance with the RWQCB's low-threat closure plan policy by conducting remediation in accordance with an approved work plan. The projected date of completion is July 15, 2018 according to the data from the most recent monitoring that was submitted in January 2017. This address is also listed as a RCRA generator due to the disposal of hazardous wastes associated with the cleanup	Yes
CA UST, CA SWEEPS UST, CA HIST UST	1328 22nd Street	Adjacent/North (within greater PSJHC Campus)	The Saint John's Hospital Building site is listed in the UST database as a result of the past use of underground storage tanks which is discussed above.	No
CA UST	1328 22nd Street	Adjacent/North (within greater PSJHC Campus)	Three complaint USTs were installed at the Saint John's Hospital Building site in 2001 and meet today's leak detection and safety standards. They are tested regularly and there are no indications of leakage	No
CA HAZNET	2001 Santa Monica Blvd	Adjacent/North-West (within greater PSJHC Campus)	This adjacent medical office building site (at the n.e. corner of Santa Monica Blvd. and 20th St.) has had several tenants with HAZNET listings for compliant waste disposal and no indications of reported releases	No
EMI, HAZNET, LUST, Cortese	The Koll Company General Telephone Co. 2020 Santa Monica Blvd	Adjacent/West (within greater PSJHC Campus)	GTE removed a leaking underground storage tank (gasoline) and remediated this the adjacent medical office building site (at the s.e. corner of Santa Monica Blvd. and 20th St.), with closure from the Water Board in 1990. Since the property has been issued closure, it is not expected to have had an impact on the environmental conditions of the Site.	No
CA LUST, CA SWEEPS UST, CA EMI, CA HIST CORTESE	General Telephone Co. 2001 Broadway	Adjacent/North-West (within greater PSJHC Campus	GTE removed a leaking underground storage tank (diesel) and remediated the adjacent medical office building site (at the n.e. corner of Santa Monica Blvd. and 20th St.), with closure from the Water Board in 1990. Since the property has been issued closure, it is not expected to have had an impact on the environmental conditions of the Site.	No

REC = Recognized Environmental Condition

SOURCE: ESA, March 2017. Based on information from Pacific Environmental Company, Phase One Environmental Site Assessment, Providence St. John's Health Center Phase II Project, Santa Monica, CA 90404, June 28, 2018.

phase liquid (LNAPL) contamination in the groundwater underlying the Hospital and potentially Sites 2C and 2D/E of the Project Site. Absorbent socks were placed in the area of where the leak was discovered to being the process of LNAPL removal and seven remediation wells were installed (MW-1 through MW-7). Per the approved work plan with the RWQCB (Case No. 904040471), the area is being remediated through bi-weekly LNAPL recovery and groundwater monitoring (e.g., seven remediation wells within Mullin Plaza). PSJHC is seeking closure in accordance with the Regional Water Quality Control Board's (RWQCB's) low-threat closure plan policy by conducting

remediation in accordance with an approved work plan. A petition for closure will be submitted once there is no longer measurable LNAPL free product in the monitoring well below the former tanks. The California Water Board's Geotracker website was consulted to obtain the latest groundwater monitoring results from the wells. According to the 1st Semi-Annual GW Monitoring and LNAPL Recovery Progress Report (July 2018) on the Geotracker website: TPH-GRO, TPH-ORO, BTEX and fuel oxygenates were not detected in any of the groundwater samples or QA/QC samples collected during the current monitoring event; TPH DRO was detected in samples from MW-4, MW-5, MW-6 and MW-7 at concentrations of 0.12 mg/L, 0.060 mg/L, 0.052 mg/L, and 0.83 mg/L, respectively; LNAPL recovery will continue on a bi-weekly basis during the second half of 2018; and groundwater sampling and reporting will continue on a semi-annual basis for one year after LNAPL has been removed to the extent practicable. (AECOM 2018)

The records search also indicates no documented releases from two of the three adjacent off-site former service stations. The third of the former off-site service stations, located at the northeast corner of the 20th Street/Santa Monica Boulevard intersection, is listed as case-closed and no further action required.

Lastly, the records search indicates that the Hospital operates three USTs near the Main Hospital. These USTs are in the loading dock area off of Arizona Avenue and include: a 20,000-gallon red dye diesel UST; a 10,000-gallon diesel UST for the emergency generators; and one 10,000-gallon diesel UST for the boiler. These tanks were installed in 2001 and meet today's leak detection and safety standards. No documented releases from these USTs have been recorded.

The Phase I ESA concludes that, with the exception of the open LUST case at the Hospital (within the North Campus underlying Sites 2C and 2D/E), none of the above listings represent a potential hazard at the Project Site due to distance, the nature/status of the listing (for example, not all listings represent hazardous materials contamination and/or many of the listings are closed cases with no further action required), the direction of groundwater flow relative to the location of the Project Site, the listing is in the process of being remediated, or for some combination of these reasons.

Other Off-Site

Lastly, the records search indicates that there are other listed off-site hazardous materials/waste sites within the regulatory-specified search radii (e.g., ¼- to 2-miles depending on the database) of the Project Site. These include: one CERCLIS and LUST site within 0.47-mile; four Superfund Enterprise Management System Archive (SEMS-ARCHIVE) sites within ½-mile; four RCRA-LQG, 27 RCRA-SQG, and one conditionally exempt RCRA-SQG within ¼-mile; one State RESPONSE site (equivalent to an federal NPL site) within 0.64-mile; 19 ENVIROSTOR sites within 1-mile; four SWLF sites within ½-mile; 50 LUST sites within ½-mile; multiple AST and UST sites; one Voluntary cleanup Plan (VCP) site within ½-mile; seven State Spills, Leaks, Investigations and Cleanup (SLIC) sites within ½-mile; nine Facility Inventory Database (CA FID UST) sites within ½-mile; and 11 Statewide Environmental Evaluation and Planning System (CA SWEEPS UST) sites within ½-mile. According to the Phase I ESA, except for the CA SWEEPS UST listing associated with the past USTs at the Hospital discussed previously, none of these off-site database listings represent a potential hazard at the Project Site for the same reasons discussed under "Adjacent Off-Site" above.

Non-ASTM/AAI Regulatory Agency Records Review

The Project Site is cited in the following non-ASTN/AAI regulatory agency records:

- County of Los Angeles Certified Unified Program Agency (CUPA), Health and Hazardous Materials Division: Records on file relate to the compliant storage of hazardous materials associated with hospital operations at Saint John's Hospital and the JWCI Building, and associated with the leaking underground storage tank at the Hospital that is currently being remediated.
- South Coast Air Quality Management Districts (SCAQMD), Records Request Unit: PEC searched the SCAQMD FIND database which indicate several permits on file for facilities within the PSJHC Campus to operate boilers, storage tanks and sterilization equipment, and for several violations over the years mostly for recordkeeping issues and permit posting deficiencies which have all been resolved.
- City of Santa Monica Fire Department, Fire Prevention: Records on file relate to the leaking underground storage tank at Saint John's Hospital that is currently being remediated, and permits to operate the USTs at the Hospital and ASTs at the JWCI Building.
- State of California, Department of Toxic Substances Control: Records on file relate to the compliant storage of hazardous materials associated with hospital operations at Saint John's Hospital and the JWCI Building, and associated with the leaking underground storage tank at the Hospital that is currently being remediated.
- Los Angeles Regional Water Quality Control Board (LARWQCB): Enforcement action records on file relate to the leaking underground storage tank at Saint John's Hospital that is currently being remediated (Case No. 904040471). As indicated previously, based on the well monitoring data, the contamination is limited to the area below where the former tank leaked, and remedial efforts are currently being made towards a low threat closure.

4.9.2.6 Radon, Methane and Mold

According to the Phase I ESA, based on the State of California Department of Health Services 1990-1991 Statewide Radon Survey and current correspondence with DHS, radon concentrations in the region within which the Project Site is located average between 2 and 4 pCi/I, with 98 percent of the sites tested having radon levels below 4 pCi/I (the California exposure standard). Therefore, radon is not generally a concern in the Los Angeles region, and is not a concern at the Project Site.

According to the Geology Report prepared for the Project (Appendix E of this EIR), the Project Site is not located within an oil field, plugged and abandoned oil exploration holes are not known to be located near the Project Site, and the potential for the Project Site to be affected by methane is considered "low" (Wood 2018). Therefore, ground-source methane is not a concern at the Project Site.

According to the Phase I ESA, based on the field reconnaissance, mold is not a concern at the Project Site.

4.9.2.7 RECs at the Project Site

Recognized environmental conditions (RECs) are defined by ASTM as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to

release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimus conditions, a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies, are not RECs.

No RECs (e.g., evidence of hazardous materials leaks, ACM, LBP, PCBs, etc.) were observed on or immediately adjacent to the Project Site during the site reconnaissance. However, based on the historical land uses, regulatory records review, user provided information, results of the previous ACM and LBP surveys of the apartment building, and the age of the other existing on-site buildings, the Phase I ESA identifies the following RECs at the Project Site:

- Open LUST Case: The Open LUST case (RWQCB Case No. 904040471) related to groundwater contamination associated with a previously removed diesel UST at Saint John's Hospital, within the North Campus adjacent to the Project Site. Contaminated groundwater may have migrated to beneath one or more of the Phase II Development Sites (Sites 2C and 2D/E). This case is currently being addressed by remediation and groundwater monitoring.
- Former On-Site Service Station Uses: The former service station uses at the MRI (Site S3) and SJF (Site 2D/E) Building sites. These historical uses have not been evaluated to determine whether they represent hazards at the Project Site.
- ACM: ACMs have been identified at the vacant on-site apartment building (Site S4) and associated parking structure. Furthermore, the CFDC (Site 2I), JWCI (Site S4) and SJF (Site 2D/E) Buildings all date from an era where ACM may be present.
- LBP: LBP has been identified at the vacant on-site apartment building (Site S4) and associated parking structure. Furthermore, the CFDC (Site 2I), JWCI (Site S4) and SJF (Site 2D/E) Buildings all date from an era where LBP may be present.

4.9.3 Regulatory Framework

4.9.3.1 Federal Regulations

Federal Hazardous Materials Management Laws

Federal agencies with responsibility for hazardous materials management include the United States Environmental Protection Agency (USEPA), Department of Labor (Federal Occupational Health and Safety Administration [OSHA]), Department of Transportation (US DOT), and the Nuclear Regulatory Commission (NRC). Major federal laws include the following statutes and regulations:

- Resources Conservation and Recovery Act 42 USC 6901 et seq. – RCRA is the principal law governing the management and disposal of hazardous materials. RCRA is considered a "cradle to grave" statute for hazardous wastes in that it addresses all aspects of hazardous materials from creation to disposal. RCRA is used to define hazardous materials, off-site disposal facilities, and the wastes each may accept are regulated under RCRA during Project construction and/or operation.
- Occupational Safety and Health Administration (OSHA; 29 USC 15) – OSHA is the federal agency responsible for ensuring worker safety. These OSHA regulations provide standards for safe workplaces and work practices, including those relating to hazardous materials handling. OSHA applies to this Project because contractors would be required to comply with its

hazardous materials management and handling requirements that would reduce the possibility of spills.

- Nuclear Regulatory Commission (NRC, 10 CFR Part 35) - NRC regulations are designed to ensure the proper use of radioactive materials in medical diagnosis, treatment, and research to ensure the safety of patients, medical workers, and the public, and to protect the environment. Medical use of radioactive materials falls broadly into the two categories of diagnostic and therapeutic procedures, with specific regulatory regulations and controls for each.

Clean Air Act, Toxic Substances Control Act and CERCLA (Asbestos)

Asbestos is regulated by the USEPA under the Clean Air Act (CAA), Toxic Substances Control Act (TSCA), and CERCLA. Emissions of asbestos fibers to ambient air are regulated by Section 112 of the Clean Air Act (42 U.S.C. 7401-7671g), as promulgated by 40 CFR 61, Subpart M (National Emissions Standards for Hazardous Air Pollutants.

4.9.3.2 State

State Hazardous Materials Management Laws

The primary state agencies with jurisdiction over hazardous chemical materials management are the California Department of Toxic Substances Control (DTSC), State Water Quality Control Board (SWQCB), and LARWQCB. Other state agencies involved in hazardous materials management are the Department of Industrial Relations (state OSHA implementation), Office of Emergency Services (OES) – California Accidental Release Prevention (CalARP) implementation, California Air Resources Board (CARB), California Department of Transportation (Caltrans), Office of Environmental Health Hazard Assessment (OEHHA – Proposition 65 implementation), and the California Integrated Waste Management Board (CIWMB). Hazardous materials management laws in California include the following statutes and regulations promulgated thereunder.

- Hazardous Waste Control Act (HWCA; California Health and Safety Code, Section 25100 et seq.) – The HWCA is the state equivalent of RCRA and regulates the generation, treatment, storage, and disposal of hazardous waste. This act implements the RCRA "cradle-to-grave" waste management system in California but is more stringent in its regulation of non-RCRA wastes, spent lubricating oil, small-quantity generators, transportation and permitting requirements, as well as in its penalties for violations.
- California Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act) – The Business Plan Act requires preparation of Hazardous Materials Business Plans (HMBPs) and disclosure of hazardous materials inventories, including an inventory of hazardous materials handled, plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures (California Health and Safety Code, Division 20, Chapter 6.95, Article 1). Statewide, DTSC has primary regulatory responsibility for management of hazardous materials, with delegation of authority to local jurisdictions that enter into agreements with the state. Local agencies are responsible for administering these regulations. Several state agencies regulate the transportation and use of hazardous materials to minimize potential risks to public health and safety, including the California Environmental Protection Agency (CalEPA) and the California Emergency Management Agency. The California Highway Patrol and Caltrans enforce regulations specifically related to the transport of hazardous materials. Together, these

agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roadways. The Business Plan Act applies to the commercial portion of this Project because contractors would be required to comply with its handling, storage, and transportation requirements that would reduce the possibility of spills, and to prepare an emergency response plan to respond to accidental spills.

- Health and Safety Code, Section 2550 et seq. – This code and the related regulations in 19 CCR 2620, et seq., require local governments to regulate local business storage of hazardous materials in excess of certain quantities. The law also requires that entities storing hazardous materials be prepared to respond to releases. Those using and storing hazardous materials are required to submit a HMBP to their local CUPA and to report releases to their CUPA and the State Office of Emergency Services.
- Certified Unified Program Agency (CUPA): Senate Bill 1082, passed in 1993, created the CUPA. The Unified Program consolidates 6 state environmental programs under one program, under the authority of a CUPA.
- California Division of Occupational Safety and Health (CalOSHA) – CalOSHA is responsible for developing and enforcing workplace safety standards and assuring worker safety in the handling and use of hazardous materials. Among other requirements, Cal/OSHA requires many entities to prepare injury and illness prevention plans and chemical hygiene plans, and provides specific regulations to limit exposure of construction workers to lead. CalOSHA applies to this Project because contractors will be required to comply with its handling and use requirements that would increase worker safety and reduce the possibility of spills, and to prepare an emergency response plan to respond to accidental spills. CalOSHA regulations are provided within California Code of Regulations, Title 8.
- Radiologic Health Branch of the California Department of Health Services – The Radiologic Health Branch of the California Department of Health Services administers the federal and state radiation safety laws that govern the storage, use, and transportation of radioactive materials and the disposal of radioactive wastes. The Radiologic Health Branch licenses institutions that use radioactive materials and radiation-producing equipment, such as x-ray equipment. To maintain a radioactive materials license, an institution must meet training and radiation safety requirements and be subject to routine inspections.
- Government Code Section 65962.5, Cortese List – The provisions in Government Code Section 65962.5 are commonly referred to as the "Cortese List" (after the Legislator who authored and enacted the legislation). The list, or a site's presence on the list, has bearing on the local permitting process, as well on compliance with the California Environmental Quality Act (CEQA). The list is developed with input from the State Department of Health Services, State Water Resources Control Board (SWRCB), CIWMB, and DTSC. While Government Code Section 65962.5 makes reference to a "list," commonly referred to as the Cortese List, this information is actually available from the following five online data resource lists: – List of hazardous waste and substances sites –DTSC EnviroStor database; – List of leaking underground storage tank (LUST) sites –SWRCB GeoTracker database; – List of solid waste disposal sites with waste constituents above hazardous levels outside the management unit; – List of active cease and desist orders and cleanup and abatement orders that concern the discharge of wastes that are hazardous materials; or – List of hazardous waste facilities subject to corrective action.

SCAQMD Rule 1403 (Asbestos)

South Coast Air Quality Management District (SCAQMD) Rule 1403 requires asbestos testing prior to renovation or demolition regardless of the age of a building. Furthermore, any facility known to contain ACMs is required to have a written Asbestos Operations and Maintenance (O&M) Program. Removal of ACM must be conducted in accordance with the requirements of SCAQMD Rule 1403. Rule 1403 regulations require that the following actions be taken: (1) a survey of the facility prior to issuance of a permit by SCAQMD; (2) notification of SCAQMD prior to construction activity; (3) asbestos removal in accordance with prescribed procedures; (4) placement of collected asbestos in leak-tight containers or wrapping; and (5) proper disposal.

Cal/OSHA (LBP)

Lead-based paint (LBP) is of concern both as a source of direct exposure through ingestion of paint chips, and as a contributor to lead interior dust. Lead was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments and drying agents beginning in the early 1950's. In 1972, the Consumer Products Safety Commission limited lead content in new paint to 0.5% (5000 ppm) and, in 1978, to 0.06% (600 ppm). As a result, building built prior to 1978 are generally suspected to have lead-based paints.

Construction activities (including demolition) that disturb LBP are subject to CalOSHA lead standards contained in Title 8, CCR, Section 1532.1. Demolition of LBP-containing structures requires waste characterization and appropriate disposal. Section 1532.1 also establishes exposure limits, exposure monitoring, and respiratory protection for workers exposed to LBP.

4.9.3.3 Local Policies and Regulations

Santa Monica Fire Department CUPA

As the designated CUPA for the City, the Santa Monica Fire Department (SMFD) is the primary local agency with responsibility for implementing federal and state laws and regulations pertaining to hazardous materials management. The SMFD was certified by CalEPA as the CUPA for the City in 1997. Designed to protect the public, worker safety, first responders and the environment, the SMFD has oversight responsibility for hazardous waste, underground storage tanks, above ground tanks, hazardous materials, community right-to-know, and accidental release prevention programs. The SMFD conducts both CUPA regulatory inspections and Fire Code inspections for all program elements, with the exception of the hazardous waste program. The SMFD contracts with the Los Angeles County Fire Department (LACFD) Health Hazardous Materials for hazardous waste inspection and enforcement of the hazardous waste program. The SMFD maintains the records regarding location and status of hazardous materials sites in the City and administers programs that regulate and enforce the transport, use, storage, manufacturing, and remediation of hazardous materials.

Santa Monica General Plan Safety Element (1995)

The Safety Element of the General Plan contains several policies regarding hazardous materials, fire hazards and emergency management. Specifically, it provides assessment of natural and manmade hazards, as well as providing a framework and guiding policies to guide future

development and strengthen existing regulations within the City. The policies that are applicable to the Project and hazardous materials are listed below:

- **Policy 5.1:** The use, storage, and transportation of toxic, explosive, and other hazardous and extremely hazardous materials shall be strictly controlled to prevent unauthorized discharges.
- **Policy 5.1.2:** The City shall continue to manage the Hazardous Materials Disclosure Program to identify and regulate business handling types and quantities of extremely hazardous materials, or hazardous materials in greater than consumer types and quantities.
- **Policy 5.1.3:** The City shall continue to require annual reporting by businesses to the Environmental Programs Division of the use, storage or manufacture of hazardous or extremely hazardous materials in any quantity. The City shall continue to require annual submission or verification of business emergency plans by businesses that use, store or manufacture any hazardous or extremely hazardous materials in quantities equal to or greater than 55 gallons, 500 pounds or 200 cubic feet.

Hospital Area Specific Plan (1988, revised 1993 and 1998)

The Hospital Area Specific Plan (HASP) includes the following hazardous materials objectives applicable within the HASP area, including at the Project Site:

- **Objective 77:** Relevant uses shall comply with: (1) the California Department of Health Services Code, Title 17, California Radiation Control Regulation; (2) Chapter 5.16, Section 5.16.030, of the Santa Monica Municipal Code, Toxic Chemical Disclosure; and (3) Section 25503.5 of Chapter 6.95 of the State Health and Safety Code, Hazardous Materials section.

City of Santa Monica Municipal Code (Chapter 5.24 of the Santa Monica Municipal Code)

Chapter 5.24 of the SMMC establishes Hazardous Materials Reporting and Response Planning (HMRRP) and Hazardous Materials Management Plans (HMMP) requirements. Section 5.24.010 requires all businesses to declare to the City if they use, store, or manufacture any quantity of a hazardous or extremely hazardous material. An annual business plan must be submitted if the business uses, stores, or manufactures hazardous materials exceeding 55-gallons or more of liquid, 500-pounds or more of solid, and/or 200-cubic feet or more of a gas, at stand temperature and pressure. In addition to inventorying the materials in question, the business plan must describe emergency response plans and procedures to be used in the event of an accident. The requirements are established to prevent or mitigate the damage to the health and safety of persons and the environment from the release or threatened release of hazardous materials into the workplace and environment.

4.9.3.4 PSJHC Plans and Policies

To ensure compliance with federal and state laws pertaining to the use, handling, and disposal of hazards and hazardous materials associated with Hospital operations, Providence Saint John's Health Center has extensive plans and policies in place addressing a variety of health and safety issues including:

- A Medical Waste Management Plan addressing the segregation, collection, handling, treatment, and disposal of medical waste

- A Pharmaceutical Waste Plan
- Sterilization of Medical Waste procedures
- A Medical Equipment Management Plan
- Procedures in the event of a HazMat Spill
- Oxygen Tank Storage requirements
- Radiation Safety Programs
- A Bioterrorism Readiness Plan
- A Infection Prevention Plan

4.9.4 Environmental Impacts

4.9.4.1 Thresholds of Significance

Appendix G of the State CEQA Guidelines provides questions that address potential impacts related to hazards and hazardous materials. The CEQA guidelines provides that lead agencies may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects, and the use of Appendix G as a significance threshold is routinely sanctioned by the courts (although such use is not mandatory). These questions are listed below and are used as the significance thresholds by the City in this section.

Would the project:

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

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?

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

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

e) For a Project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working at the project site?

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

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

Non-applicable Checklist Questions:

Checklist Question (e) public airport: The Project Site is not located within an airport land use plan. In addition, while the Project Site is located approximately 1.5 miles north of Santa Monica Municipal Airport, the Project Site is not located within the aircraft takeoff and landing flight paths

or Airport Influence Area of the Airport (County of Los Angeles, 2003). Furthermore, the Project would not include high-rise development that could potentially pose a hazard to aviation (the tallest proposed building would be 6 floors). Therefore, the Project would not result in a hazard or excessive noise for people residing or working at the Project Site, and no impact would occur.

Checklist Question (g) wildfire: The Project Site is located in an urbanized area of Santa Monica surrounded on all sides by urban development. Furthermore, the Project Site is not located adjacent to or intermixed with wildlands; the southernmost extent of the Very High Fire Severity Zone terminates approximately 3 miles north of the Project Site (CalFire, 1995). As such, the Project would not subject people or structures, either directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires, and no impact would occur.

4.9.4.2 Methodology

The analysis of hazardous conditions and impacts associated with construction and operation of the Project is based in part, on the Phase I ESA prepared for the Project (Appendix H of this EIR). The Phase I ESA included: a visual inspection of the Project Site and surrounding areas; a review of historical records for the Project Site; interviews with personals familiar with the history of the Project Site; and a search and review of available Federal, state, and local regulatory environmental files and databases. Based on this information, the Phase I ESA indicates whether any RECs exist at the Project Site, and identifies recommendations for addressing these RECs. The Phase I ESA was prepared in accordance with American Society for Testing and Materials (ASTM) Standard E 1527-13. PEC did not identify any significant data gaps that affected the ability to identify RECS in connection with the Project Site.

The Phase I ESA did not include testing of existing on-site buildings for ACM or LBP, or of existing on-site mechanical equipment for PCBs. This analysis conservatively assumes that these materials may be present. Testing for these materials, and removal of these materials in accordance with applicable regulations, is required by recommendations in the Phase I ESA, and these recommendations are included as mitigation measures at the end of this section.

See the Phase I ESA, included as Appendix H of this EIR, for further discussion of the methodology utilized to assess existing hazardous conditions.

4.9.4.3 Project Characteristics

The Project would include the demolition of existing medical buildings and residential uses, surface parking lots, and associated road and utility infrastructure on the Project Site, and would develop new medical buildings and residential uses, structured parking (both above- and below-grade), and associated road and utility infrastructure. Demolition and construction activities would be implemented pursuant to applicable regulations and requirements that address potential contamination, including but not limited to requirements for the safe removal of ACMs, LBPs, and other hazardous materials. Excavation of on-site soils would be required for up to five levels (60 ft) of below grade subterranean parking.

The Project would include the use of the same types of hazardous materials during operation that are currently used at the Project Site and greater PSJHC Campus. As part of this hazardous

materials use, the Project would comply with applicable hazards and hazardous materials regulations, and would continue to implement existing PSJHC hazardous materials operating procedures and practices. No physical improvements, practices or procedures related to hazardous materials are proposed at this time (to be determined at the permitting stage for the proposed uses).

Some of the more important hazardous materials regulations to be adhered to by the Project are listed below. Unless as otherwise indicated, see the "Regulatory Setting" subsection above for a discussion of each of these regulations:

- Federal RCRA (42 USC 6901 et seq.) "cradle to grave" requirements.
- Federal OSHA (29 USC 15) safe workplace and work practices requirements.
- California CAA (Section 12), TSCA, and CERCLA requirements related to asbestos.
- California HWCA (California Health and Safety Code, Section 25100) related to the treatment, hazardous materials generation, treatment, storage and disposal requirements.
- California Hazardous Materials Release, Response Plans and Inventory Law of 1985 (Business Plan Act).
- California Health and Safety Code (Section 2550 et seq.) requirements related to local business storage of hazardous materials.
- CalOSHA requirements related to workplace safety in relation to hazardous materials (e.g., injury and illness prevention plans, emergency response to accidental spills, etc.).
- California Cortese List (Government Code Section 65962.5) requirements related to required remediation of listed hazardous materials/waste sites.
- SCAQMD Rule 1403 related to asbestos.
- CalOSHA requirements related to LBP.
- SMFD CUPA requirements related to the storage of hazardous waste, accidental release prevention programs, and the community's right-to-know.
- HASP: "Infectious wastes generated from medical practices typically include laboratory wastes, pathological specimens (human tissue), surgical specimens, and miscellaneous equipment and instruments which contain microorganisms or viruses which, if improperly exposed to humans, could cause adverse effects. California Department of Health Services regulations include requirements for waste generators, storage and containment of infectious waste, and standards for ultimate disposal practices which might include incineration, burial at an approved landfill, sterilization or discharge to the sewage system. Medical practices are also subject to the following regulations:
  - Toxic Chemical Disclosure Form. Chapter 3 of the Santa Monica Municipal Code Section 5302 requires that a business engaging in a medical, dental, x-ray processing or chemical laboratory use file this form prior to the issuance of a business license. In this manner the City may respond quickly to any emergency created by the handling, storage, use or disposal of toxic chemical, radioactive materials and hazardous wastes.
  - Industrial Discharge Permit. The City of Los Angeles requires businesses that discharge liquid infectious wastes into the sewage system to obtain this permit. The permit will not be issued unless a determination has been made that discharged water will not violate provisions of the City's ordinance or the water quality objectives for receiving waters

established by the California Water Quality Control Board. The Board bases its approval of the industrial wastewater permit on information provided in a detailed disclosure application.

– California Radiation Control Regulation. The California Department of Health Services requires medical institutions handling radioactive materials or radio pharmaceuticals to obtain a license for the possession of radioactive material and its use in or on human beings., The regulations prescribe procedures and standards for radio pharmaceutical handling, storage, and disposal; employee training requirements, survey instrumentation calibration, and emergency procedures testing requirements to prevent contamination of personnel and work areas.

Strict compliance with local, state and federal regulations for hazardous waste will ensure that toxic waste produced in the hospital area will be disposed of in a manner that will not threaten the surrounding neighborhood." (City of Santa Monica 1988)

Also, Objective 77 of the HASP requires that relevant uses within the HASP area (including the proposed Project) shall comply with: (1) the California Department of Health Services Code, Title 17, California Radiation Control Regulation; (2) Chapter 5.16, Section 5.16.030, of the Santa Monica Municipal Code, Toxic Chemical Disclosure; and (3) Section 25503.5 of Chapter 6.95 of the State Health and Safety Code, Hazardous Materials section. (HASP 1998)

To ensure compliance with federal and state laws pertaining to the use, handling, and disposal of hazards and hazardous materials associated with Hospital operations, Providence Saint John's Health Center has extensive training programs, plans, policies, and requirements in place addressing a variety of health and safety issues including:

- A Medical Waste Management Plan addressing the segregation, collection, handling, treatment, and disposal of medical waste
- A Pharmaceutical Waste Plan
- Sterilization of Medical Waste procedures
- A Medical Equipment Management Plan
- Procedures in the event of a HazMat Spill
- Oxygen Tank Storage requirements
- Radiation Safety Programs
- A Bioterrorism Readiness Plan
- An Infection Prevention Plan

These programs, plans, policies, and requirements provides information on safe work procedures and practices, safety equipment and personal protective equipment to prevent environmental and health hazards. Additionally, information is provided on how proper response protocols in the event of an incident related to hazards and hazardous materials.

4.9.4.4 Project Impacts

Routine Transport, Use, or Disposal of Hazardous Materials

Impact HAZ-1: *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Impact Statement HAZ-1: The Project would not create a significant hazard to the public or the environment through the routine transport, use, and disposal of the small quantities of hazardous. With compliance with manufacturer instructions and applicable federal, state and local health and safety regulations, this impact would be less than significant.

Project construction activities would involve the short-term transport, use, storage and disposal of small quantities of hazardous materials for construction such as paint, adhesives, surface coatings, finishing materials, and cleaning agents during building finishing activities. Project operations would involve the transport, use, storage and disposal of small quantities of hazardous materials for building and landscape maintenance such as cleaning solvents, painting supplies, pesticides, and diesel (for the emergency generator). Additionally, the operation of the Project's medical and laboratory uses would continue to include the transport, use, storage and disposal of hazardous materials such as biological agents and chemicals, and would continue to generate small quantities of hazardous waste such as "sharps" containers, pharmaceutical waste, chemo waste, and pathological waste, at the Project Site. However, the transport, use, storage and disposal of hazardous materials during Project construction and operation, would occur in accordance with PSJHC health and safety policies and protocols as well as applicable federal, state and local health and safety regulations (e.g., RCRA and HWCA "cradle to grave" requirements, OSHA workplace and work practices requirements, City HMRRP/HMMP requirements, etc.) which have been formulated to avoid the exposure of persons and the environment to hazardous materials. Furthermore, the quantities of hazardous materials involved would be small.

With regard to medical waste, the Project would generate medical waste similar to the types of medical waste currently generated at the Project Site. In addition: (1) hazardous materials are required to be stored in designated areas designed to prevent accidental release; (2) CBC requirements prescribe safe accommodations for materials that present a moderate explosion hazard, high fire or physical hazard, or health hazard; (3) Federal and State laws related to the storage of hazardous materials would be to complied with to maximize containment and provide for prompt and effective clean-up in case of an accidental release; and (4) Hazardous Materials Inventory and Response Planning Reports would be filed with the City in accordance with Unified Program Permit requirements. Furthermore, as indicated previously, the Project would adhere to the hazardous materials/waste requirements and protocols set forth by the PSJHC, which includes federal/state regulations. This includes toxic chemical disclosure form, industrial discharge permit, and California radiation control requirements. These, and other applicable hazardous materials regulations, have been formulated to avoid substantial hazards to the public or the environment associated with the routine transport, use, storage or disposal of medical waste associated with hospital and other medical use operations.

As the Project would comply with all applicable hazardous materials regulations, including but not limited to those enumerated above, which have been formulated to avoid substantial hazards, the

Project would not create a significant hazard to the public or the environment through the routine transport, use, storage or disposal of hazardous materials. Therefore, impacts would be less than significant.

Hazardous Materials Release

Impact HAZ-2: *Would the project 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?*

Impact HAZ-4: *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant of Government Code Section 6592.5, and as a result, it would create a significant hazard to the public or the environment?*

Impact Statement HAZ-2: Project construction activities could create a potential significant hazard to the public or environment due to the release of hazardous materials associated with the Open LUST case and former on-site service stations. Additionally, Project demolition activities could release ACMs and LBP that may be present in multiple existing on-site buildings to be demolished. These impacts would be less than significant level with compliance with applicable regulatory requirements and implementation of the prescribed mitigation measures.

As indicated previously, the Project Site is not listed in any regulatory hazardous materials databases, except for the registered AST which is in good operating order and the two previous service station sites. The Phase I ESA identifies the following RECs as affecting the Project Site associated with the previous service station uses and non-ASTM issues:

- Open LUST Case: The Open LUST case relates to groundwater contamination associated with a previously removed diesel UST at Saint John's Hospital, within the North Campus. Monitoring wells have been installed within Sites 2C and 2D/E of the Project Site, and bi-weekly LNAPL recovery and groundwater monitoring are being conducted with low-threat closure of the case expected sometime in 2020.
- Former On-Site Service Stations: The former service stations at the MRI (S3) and SJF (2D/E) Building sites. These historical uses have not been evaluated to determine whether there are any associated hazards at the Project Site.
- ACM: Asbestos-containing materials (ACM) have been identified at the vacant on-site apartment building and associated parking structure. Furthermore, the CFDC, JWCI, and SJF Buildings all date from an era where ACM may be present.
- LBP: LBP has been identified at the vacant on-site apartment building and associated parking structure. Furthermore, the CFDC, JWCI, and SJF Buildings all date from an era where LBP may be present.

With regard to the Open LUST case (RWQCB Case No. 904040471) at Saint John's Hospital (North Campus), the Phase I ESA indicates that contaminated groundwater associated with this case is currently being remediated through groundwater extraction and treatment by wells within Mullin Plaza. Remediation efforts are being conducted in accordance with the RWQCB's work plan and closure of the LUST case is expected in 2020. Project construction activities for Sites 2C would occur in 2027-2031 under Phasing Plan A and 2021-2026 under Phasing Plan B, with

construction at Site 2D/E occurring in 2038-2041. Therefore, Project construction would likely occur after the closure of the LUST case by the RWQCB, and the Project would not result in the release of hazardous materials into the environment associated with this REC. In any case, Project excavation activities would remove any potential contamination remaining (if any) in the soils. Compliance with MM-HAZ-2 would ensure that contaminated soils (if encountered) at Sites 2C and 2D/E would be properly and safely managed and removed.

With regard to the former on-site service station uses at the current locations of the MRI and SJF Buildings, the Phase I ESA indicates that these former uses have not been evaluated to determine whether there are any associated hazards at the Project Site, such that the Phase I ESA identifies these former uses as a REC affecting the Project Site, thereby warranting additional assessment and the potential need for remediation. Therefore, within the above-specified locations on the Project Site, construction workers could potentially be exposed to hazardous materials during Project construction, and building occupants could potentially be exposed to hazardous materials during Project operation. This represents a potentially significant impact.

Worker safety and health are generally regulated by OSHA and Cal-OSHA. OSHA and Cal-OSHA standards establish exposure limits for certain air contaminants. Exposure limits define the maximum amount of hazardous airborne chemicals to which an employee may be exposed over specific periods. When administrative or engineering controls cannot achieve compliance with exposure limits, protective equipment or other protective measures must be used. Employers are also required to provide a written health and safety program, worker training, emergency response training, and medical surveillance.

The Cal-OSHA program regulates worker exposure to airborne contaminants during construction under Title 8, Section 5155, Airborne Contaminants, which establishes which compounds are considered a health risk, the exposure limits associated with such compounds, protective equipment, workplace monitoring, and medical surveillance required for compliance. Even with the implementation of applicable worker safety regulations, the potential for construction workers and future building occupants to be exposed to hazardous materials in exceedance of applicable thresholds is considered a potentially significant impact because applicable regulations do not provide site-specific procedures and mechanisms to ensure regulatory compliance, or to protect and train workers for the presence of these materials.

Mitigation Measures HAZ-1 through HAZ-3 are prescribed further below to address the above potentially significant impacts related to residual soil contamination.

With regard to the vacant on-site apartment building and associated parking structure which have been confirmed to contain ACMs and LBP, and the CFDC, JWCI, and SJF Buildings which, based on their dates of construction may potentially contain ACMs and LBP, the Phase I ESA identifies these as RECs affecting the Project Site. Improper removal and/or handling of ACMS and LBPs could expose people and/or the environment to significant hazardous materials impacts associated with ACMs and/or LBPs. Thus, Mitigation Measures HAZ-4 and HAZ-5 are prescribed below to address potentially significant ACM and LBP impacts during construction activities.

With regard to radon, methane and mold, as indicated previously, radon, methane and mold are not concerns at the Project Site. Therefore, impacts associated with these hazards would be less than significant.

Hazardous Materials/Emissions Near Schools

Impact HAZ-3: *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

Impact Statement HAZ-3: Project construction could emit hazardous emissions and handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing school. However, through compliance with applicable regulations and manufacturer instructions, and implementation of mitigation measures, the Project would not expose a school to substantial health risks during construction with impacts being less than significant. Project operation would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste that would result in significant hazards to any school.

Four schools are located in the general vicinity of the Project Site, including: McKinley Elementary School, located at 2401 Santa Monica Boulevard approximately 0.04-mile to the east; Crossroads Elementary School, located at 1715 Olympic Boulevard approximately 0.30-mile to the southwest; Lincoln Middle School, located at 1501 California Street approximately 0.45-mile to the west; and Franklin Elementary School, located at 2400 Montana Avenue approximately 0.61-mile to the north. One of these schools, McKinley Elementary, is located within one-quarter mile of the Project Site.

As discussed under Impact Statement HAZ-1, Project construction and operation would involve the on-site use of hazardous materials. However, for the same reasons discussed under Impact HAZ-1 (e.g., compliance with applicable regulations and manufacturer instructions, use of small quantities, etc.), potential impacts on McKinley Elementary would be less than significant.

As discussed under Impact Statement HAZ-2, Project construction would have the potential to result in the accidental release of hazardous materials related to the removal of the existing AST, soil excavation at the former on-site service station uses, ACMs, and LBP which represent RECs at the Project Site. Hence, Project construction activities could potentially disturb existing hazardous materials and result in their release into the environment. However, with implementation of Mitigation Measures HAZ-1 to HAZ-5, potential impacts on McKinley Elementary would be less than significant levels.

Emergency Response and Evacuation Plans

Impact HAZ-5: *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Impact Statement HAZ-4: The Project would not significantly impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The impact would be less than significant.

Vehicle and emergency access to the Project Site are provided directly by Santa Monica Boulevard, Broadway, and 20th through 23rd Streets, with regional access provided by the Santa Monica Freeway (Interstate 10) located approximately 0.9 –mile to the south via ramps at Cloverfield Boulevard. None of these streets would be blocked or substantially altered by the Project, with the exception of 21st Street. The northern portion of 21st Street, between Santa Monica Boulevard and Broadway, would be vacated but replaced with a new north-south street between Santa Monica Boulevard and Broadway to be called 20th Place.

As indicated above, there is existing access to the Project Site and surrounding vicinity from multiple streets, and given the grid pattern of the existing street system in the vicinity and proposed 20th Place, this would continue under the Project. Additionally, while Santa Monica Boulevard, Olympic Boulevard, and the Santa Monica Freeway are City-designated disaster routes (County of Los Angeles, 2008), and while a portion of the Project Site is located along Santa Monica Boulevard and the Project would include new driveways and circulation improvements along this roadway, all such improvements would be reviewed and approved by the City to ensure the provision of adequate emergency access.

Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response or emergency evacuation plan, and the impact would be less than significant.

4.9.4.5 Cumulative Impacts

Generally, the geographic context for cumulative impact analysis of hazards and hazardous materials includes the cumulative projects in the vicinity of the Project. As described above, the Phase I ESA identified multiple properties located between 0.25 miles to 1 mile of the Project Site that are listed on one or more regulatory hazardous materials databases. However, the Phase I ESA concludes that, with the exception of the Open LUST case at Saint John's Hospital immediately north of the Project Site which is currently being remediated with case closure expected sometime during 2018, none of these listed sites represent a REC at the Project Site.

Similarly, while the Project Site contains a registered AST, the sites of two former service stations that have not yet been evaluated for the presence of residual hazardous materials, and on-site buildings with ACMs and LBP, mitigation measures are recommended in this section that would reduce any potential hazardous materials impacts associated with these on-site RECs and the Project to less than significant levels. Thus, the Project would not result in hazardous materials impacts on adjacent properties.

Furthermore, as indicated in the Project impact analysis above, the Project would have no impact or less than significant impacts in terms of: hazardous emissions impacts on schools; exposure to radon, methane and mold; aircraft/airport noise/hazards; wildfire hazards; and interference with an adopted emergency response/evacuation plan.

Based on the above, the Project would not contribute considerably to cumulative hazards and hazardous materials impacts, and the cumulative impact would be less than significant.

4.9.5 Mitigation Measures

MM HAZ-1: Additional Assessment/Remediation – Site S3 and Site 2D/E. Prior to the issuance of a grading permit for each site - Site S3 and Site 2D/E, additional assessment in the form of soil and soil vapor sampling shall be conducted to determine whether there is any soil or groundwater contamination associated with the former service station uses at these sites, once the existing on-site buildings/structures are demolished. If the additional assessment reveals concentrations of volatile organic compounds (VOCs) and/or other hazardous substances above applicable California Human Health Screening Levels (CHHSL), soil remediation and health and safety measures required by the applicable regulatory agencies [e.g., California Department of Toxic Substances (DTSC), Los Angeles Regional Water Quality Control Board (LARWQCB), etc.] shall be implemented by the Project Applicant during construction, which will be included in a Soils Management Plan and a Health and Safety Plan, as applicable (refer to Mitigation Measures HAZ-2 and HAZ-3).

The additional assessment shall also include a survey to determine the presence of any underground storage tanks (UST) associated with the former on-site gas stations. If a UST is discovered, the Applicant shall notify the SMFD prior to tank removal and prepare a work plan for UST removal. The work plan shall be approved by the SMFD and shall identify methods/procedures to remove or neutralize any flammable materials and vapors in the UST prior to transport, and establish to the satisfaction of the SMFD that no release of hazardous materials has occurred or that the release of hazardous materials is otherwise addressed in the SMP. The UST shall be properly disposed of by a licensed contractor in accordance with applicable regulations.

MM HAZ-2: Soil Management Plan (SMP):

Should the assessments required under MM HAZ-1 above for Site S3 and Site 2D/2E reveal chemicals of concern above applicable CHHLs and for excavation activities associated with Site 2C and Site 2D/E, the Project Applicant shall retain a qualified environmental consultant to prepare a SMP, which will be submitted to DTSC, RWQCB, and/or City of Santa Monica Fire Department for review and approval prior to the commencement of excavation and grading activities. The recommendations of the applicable oversight agency shall be incorporated in the SMP. The SMP shall be implemented during excavation and grading activities on the identified Site to ensure that any contaminated soils are properly identified, excavated, and disposed of off-site, as follows:

- The SMP shall be prepared and executed in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. The SMP shall require the timely testing and sampling of soils so that contaminated soils can be separated from inert soils for proper disposal.

The SMP shall specify the testing parameters and sampling frequency. During excavation, Rule 1166 requires that soils identified as contaminated shall be sprayed with water or another approved vapor suppressant, or covered with sheeting during periods of inactivity of greater than an hour, to prevent contaminated soils from becoming airborne. Under Rule 1166, contaminated soils shall be transported from the Project Site by a licensed transporter and disposed of at a licensed storage/treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment.

- During the excavation phase, the Applicant shall remove and properly dispose of contaminated materials in accordance with the provisions of the SMP. If soil is stockpiled prior to disposal, it will be managed in accordance with the Project's Storm Water Pollution Prevention Plan, prior to its transfer for treatment and/or disposal. All impacted soils would be properly treated and disposed of in accordance with SCAQMD Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil, as well as applicable requirements of DTSC and LARWQCB.
- A qualified environmental consultant shall be present on the Site during grading and excavation activities in the known or suspected locations of contaminated soils or the UST, and shall be on call at other times as necessary, to monitor compliance with the SMP and to actively monitor the soils and excavations for evidence of contamination.

MM HAZ-3: Health and Safety Plan (HASP): Should the assessments required under MM HAZ-1 above reveal chemicals of concern above applicable clean-up goals, the Applicant shall commission a HASP to be prepared in compliance with Occupational Safety and Health Administration (OSHA) Safety and Health Standards (29 Code of Federal Regulations 1910.120) and Cal-OSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719) and submitted for review by the Department of Building and Safety. The HASP would address, as appropriate, safety requirements that would serve to avoid significant impacts or risks to workers or the public in the event that elevated levels of subsurface gases are encountered during grading and excavation. The HASP would also address potential vapor encroachment from the soil contamination into the subterranean levels of the building. As necessary, gas monitoring devices would be in place to alert workers in the event elevated gas or other vapor concentrations occur when basement slab demolition or soil excavation is being performed. Contingency procedures would be in place in the event elevated gas concentrations are detected, such as the mandatory use of personal protective equipment, evacuation of the area, and/or increasing ventilation within the immediate work area. Workers would be trained to identify exposure symptoms and implement alarm response. Construction fencing would be installed around development areas to restrict public access from surrounding properties and other phases of the Project Site, further reduce the potential for contaminated soils to become airborne, and provide additional distance between the public and excavation activities to allow for gas and vapor dilution. Vapor suppression measures also would be identified consistent with the SMP, as necessary, to avoid health hazards to adjacent properties. The HASP would have emergency contact numbers, maps to the nearest hospital, gas monitoring action levels, gas response actions, allowable worker exposure times, and mandatory personal protective equipment requirements. The HASP would be signed by all workers involved in the demolition and excavation of on-site soils to demonstrate their understanding of the risks of excavation.

MM-HAZ-4 Asbestos Containing Materials: Pursuant to SCAQMD requirements, testing for presence of ACM shall be conducted in the CFDC, JWCI, and SJF Buildings prior to demolition of these structures. Any ACM found in these buildings, and the previously confirmed ACM in the vacant on-site apartments and associated parking structure, shall be removed by a licensed and certified asbestos abatement contractor prior to demolition of these buildings pursuant to SCAQMD Rule 1403 and Cal-OSHA Asbestos Regulations.

MM-HAZ-5 Lead Based Paints: Testing for the presence of LBP shall be conducted in the CFDC, JWCI, and SJF Buildings prior to demolition of these structures. Any LBP found in these buildings, and the previously confirmed LBP in the vacant on-site apartments and associated parking structure, shall be removed by lead-certified personnel following the Cal-OSHA lead standards contained in CCR Title 8, Section 1532.1 and lead-safe work practices prior to demolition of these buildings. An environmental contractor with California Department of Public Health certified workers shall be retained to carry out the work in compliance with the regulations that govern LBP.

4.9.6 Level of Significance After Mitigation

With implementation of the prescribed mitigation measures, along with compliance with applicable regulations, potentially significant Project impacts would be reduced to a less than significant level.

4.10 Hydrology and Water Quality

4.10.1 Introduction

This section evaluates impacts on hydrology and water quality due to construction and operation of the Project. Hydrology issues addressed include drainage, water quality, flooding, groundwater levels, and inundation by seiches, tsunamis and mudflows. This section is primarily based on a 2018 Hydrology Study prepared for the Project by KPFF Consulting Engineers (KPFF 2018) and included in Appendix I of this EIR. Other sources of information relied on in this section include the Preliminary Geotechnical Study prepared for the Project by AMEC (AMEC 2014) and included in Appendix E of this EIR, Best Available Maps (BAM) from the California Department of Water Resources (DWR 2018), the City of Santa Monica 2006 Watershed Management Program (City of Santa Monica 2006), and the City of Santa Monica 2016 Urban Water Management Plan (UWMP) (City of Santa Monica 2016a).

4.10.2 Environmental Setting

4.10.2.1 Watershed and Regional Setting

Santa Monica Bay Watershed

The City lies within the Santa Monica Bay Watershed Management Area (Watershed) of the Los Angeles Basin. The 414-square mile Watershed drains to the Pacific Ocean and Santa Monica Bay, from the Santa Monica Mountains south and west across the Los Angeles Coastal Plain to Ballona Creek and the coastal portion of the Palos Verdes Peninsula, which together form the southern boundary of the Watershed. Santa Monica Bay is located adjacent to one of the most populous, urbanized coastal metropolitan areas in the U.S. and, as such, discharge of treated municipal, commercial, and industrial runoff, cooling water, and municipal and industrial wastewater discharges have impacts on regional water resources such as inland surface waters, estuarine waters, and marine waters, including wetlands, lakes, rivers, estuaries, lagoons, harbors, bays, and beaches.

Urban pollutants reach the Santa Monica Bay through wastewater discharge and urban runoff. Urban runoff (which includes stormwater runoff from rain and dry weather runoff) is attributed to the presence of impermeable surfaces, such as buildings, streets, sidewalks, parking lots, storm drains and other paved surfaces; these surfaces prevent the natural infiltration of water into the ground. Impermeable surfaces are inherent to urbanized settings and currently cover the majority of the vicinity in which the Project Site is located.

Within the Watershed, drainage infrastructure is designed and constructed with an alignment and capacity intended to protect life and property from flooding caused by rainstorm events. The design and capacity of storm water drains, culverts, channels and pumping stations are optimized to provide flood control for an area in a cost-effective way after accounting for reasonable rainfall scenarios.

Hydrology and Drainage

The City's drainage infrastructure is divided into 13 drainage basins, which all drain to the Santa Monica Bay. The Project Site and greater Providence Saint John's Health Center (PSJHC) Campus are located in the Kenter Canyon drainage basin. Kenter Canyon Basin is the largest watershed in Santa Monica. Its total area is approximately 3,968 acres, of which 1,424 acres (or 35 percent) are located within the City limits with the balance in the City of Los Angeles. The portion of the Kenter Canyon drainage basin that lies within Santa Monica mainly consists of residential, commercial, hospital, transportation, and industrial land uses. There are also a handful of schools and parks scattered throughout the basin, as well as a park in the uppermost portion of Wilshire Basin, Douglas Park, that could also accommodate runoff from Kenter Canyon.

During a storm event, storm water runoff is conveyed by the existing network of storm drains to the Pico-Kenter Drain, a 10-foot diameter storm drain that runs through the City and outfalls to the Santa Monica Bay at the western end of Pico Boulevard. While individual segments of the storm drains within the drainage basin have varying degrees of excess capacity, the storm drains in the basin have generally been constructed with capacity to serve flows from a 10-year storm event (City of Santa Monica 2006).

Dry weather runoff (i.e. runoff when there is no precipitation) can occur from excess irrigation, spills, construction sites, pool draining, car washing, washing down paved areas, and residual wet weather runoff. The Pico Kenter diversion system diverts dry weather runoff from the Pico-Kenter storm drain system to the City's Santa Monica Urban Runoff Recycling Facility (SMURRF) for treatment before release to the Santa Monica Bay. The SMURRF treats dry weather urban runoff to remove pollutants, including sediment, oil, grease, and pathogens. The processed non-potable water is reused by the City and corporate customers for irrigation. The SMURRF treats and recycles up to 500,000 gallons of dry weather urban runoff per day and has a maximum treatment capacity of 750,000 gallons per day. Wet weather runoff (e.g., runoff from storm events) bypasses the diversion system and is discharged directly to Santa Monica Bay.

Groundwater

The City is underlain by the 50.2-square mile Santa Monica Groundwater Basin (SMGB), which covers western Los Angeles County including the cities of Santa Monica, Culver City, Beverly Hills, and western Los Angeles. Groundwater in the SMGB is replenished by percolation from rainfall and by surface runoff from the Santa Monica Mountains. As further, described in Section 4.19, *Water Supply*, of this EIR, the City produces groundwater from wells located within the SMGB as the major component of its supply to meet City demand for water. In the past, there has been groundwater contamination within the Charnock sub-basin. The contamination within Charnock Well Field is being addressed using filtration with granular activated carbon to treat water from three contaminated wells, followed by additional treatment at the Reverse Osmosis (RO) facilities at the Santa Monica Water Treatment Plant. The City protects groundwater resources through the implementation of recommended watershed management projects identified in the WMP and ordinances that require individual projects to follow Low Impact Development (LID) techniques and use Best Management Practices (BMPs).

4.10.2.2 Local Setting – Project Site

Drainage

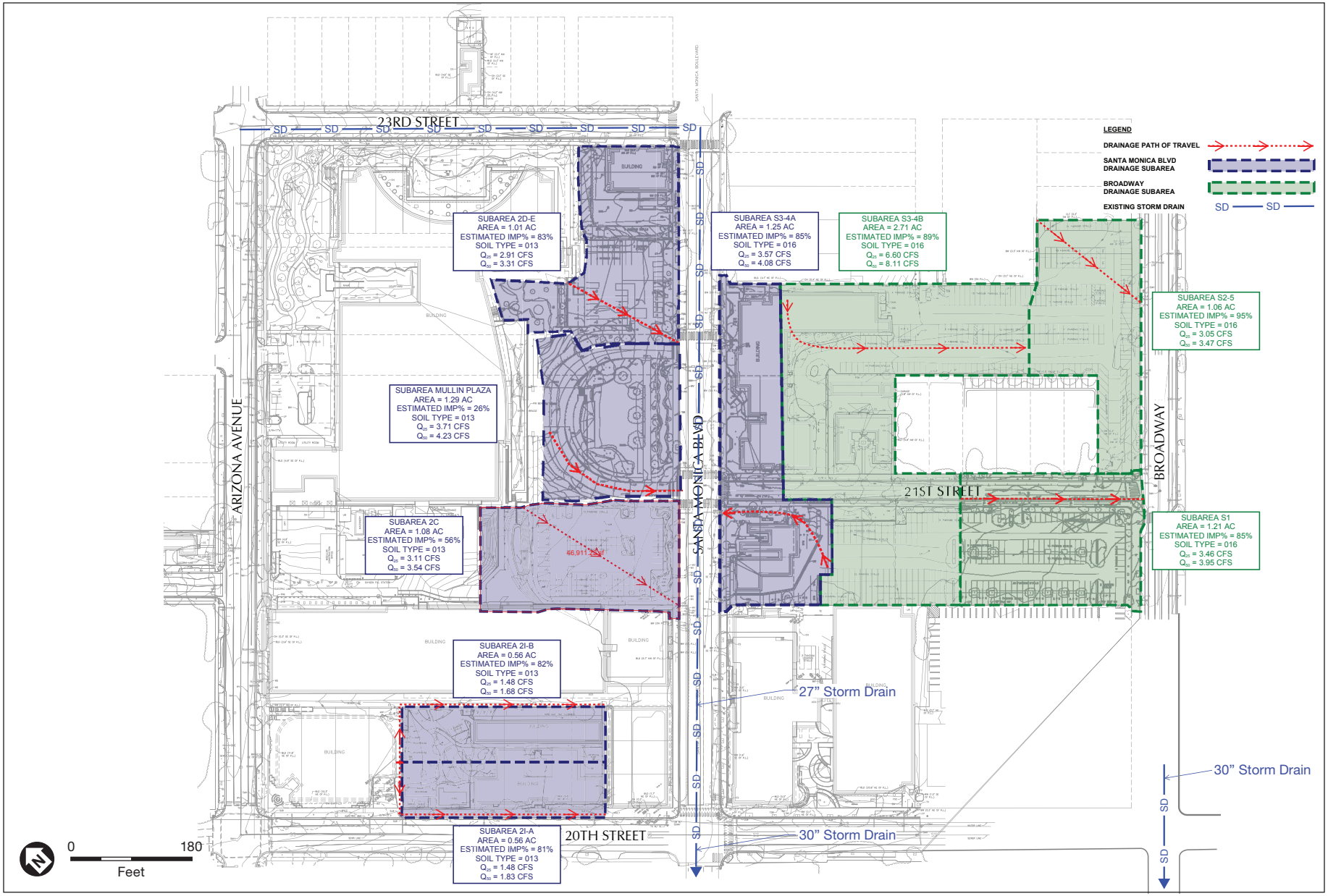
The Project Site includes approximately 9.17-acres within the greater PSJHC Campus, which in-turn is located in Downtown Santa Monica within a fully urbanized setting. The Project Site is relatively flat, with grades sloping from north to south at approximately 1.5 to 2.0 percent, the high point at the northeast corner at approximately 166 feet above mean sea level (msl), and the low point in the southwest tip at approximately 147 feet msl. (KPFF 2018) There are no streams or creeks in the Project vicinity; surface runoff flows to curbed gutters and drainage inlets to reach the subterranean municipal storm drain system.

The Project Site is currently developed with urban uses, including six medical buildings, a vacant 10-unit apartment building, several surface parking lots, and Mullin Plaza. As indicated in **Figure 4.10-1**, *Existing Drainage Conditions*, and in **Table 4.10-1**, *Existing Percent Imperviousness at the Project Site*, the Project Site is split into two tributary drainage areas and eight drainage subareas, with the first area located on the North Campus and along Santa Monica Boulevard on the South Campus draining toward Santa Monica Boulevard, and the second area located in the balance of the South Campus draining toward Broadway. As indicated in Table 4.10-1, the drainage subareas in the Santa Monica Boulevard tributary drainage area range from 26 to 85 percent impervious with a total of approximately 66 percent impervious, while the drainage subareas in the Broadway tributary drainage area range from 85 to 95 percent impervious with a total of approximately 77 percent impervious.

TABLE 4.10-1
EXISTING PERCENT IMPERVIOUSNESS AT THE PROJECT SITE

Drainage Subarea (#)	Drainage Subarea (sf)	Percent Impervious (%)
Santa Monica Blvd Tributary Area		
2I-A	24,400	81
2I-B	24,400	82
2C	47,100	56
2D-E	44,000	83
Mullin Plaza	56,200	26
S3-4A	54,500	85
Subtotal	**250,500**	**66**
Broadway Tributary Area		
S1	52,700	85
S2-5	46,200	95
S3-4B	118,000	89
Subtotal	**216,900**	**89**
Total	467,400	77

Acronyms/Abbreviations: sf = square feet; cfs = cubic feet per second
KPFF Consulting Engineers, Hydrology Study – Providence Saint John's Health Center Phase II Project, August 2018.



SOURCE: KPFF Consulting Engineers, Hydrology Report – Providence Saint John's Health Center Phase II Project, April 2018

Providence Saint John's Health Center Phase II Project

Figure 4.10-1
Existing Drainage Conditions

ESA

As indicated in Figure 4.10-1, drainage infrastructure in the Project vicinity includes: a 27-inch storm drain in Santa Monica Boulevard between 23rd and 20th Streets, which increases to a 30-inch drain west of 20th Street; a 30-inch storm drain maintained by the Los Angeles County Flood Control District in Broadway starting just east of 20th Street; curb gutters in these streets; and miscellaneous other drainage infrastructure. Stormwater runoff from the Santa Monica Boulevard tributary drainage area drains via sheet flow to the curb gutter in the north side of Santa Monica Boulevard and then into the 27-inch Santa Monica storm drain, while stormwater runoff from the Broadway tributary drainage area drains via sheet flow to the curb gutter in the north side of Broadway and then into the 30-inch Broadway storm drain. Wet weather runoff from these storm drains discharges directly to Santa Monica Bay. The dry weather runoff in the Santa Monica Boulevard and Broadway storm drains flows southwestward and is diverted to the City's SMURFF for treatment before being discharged to Santa Monica Bay.

The existing 25- and 50-year peak stormwater runoff flows from the Project Site are estimated in **Table 4.10-2**, *Existing 25- and 50-Year Peak Stormwater Flows from the Project Site*. As indicated therein, the existing 25- and 50-year peak runoff flows from the Santa Monica Boulevard tributary drainage area are estimated at 16.71 and 19.19 cubic feet per second (cfs), respectively, while the existing 25- and 50-year peak runoff flows from the Broadway tributary drainage area are estimated at 13.11 and 15.53 cfs, respectively. The 25- and 50-year peak runoff from both tributary drainage areas combined are of 29.82 and 34.72 cfs, respectively.

TABLE 4.10-2
EXISTING 25- AND 50-YEAR PEAK STORMWATER FLOWS FROM THE PROJECT SITE

Drainage Subarea (#)	25-Yr Flow (cfs)	50-Yr Flow (cfs)
Santa Monica Blvd Tributary Area		
2I-A	1.48	1.83
2I-B	1.48	1.68
2C	3.11	3.54
2D-E	3.36	3.83
Mullin Plaza	3.71	4.23
S3-4A	3.57	4.08
Subtotal	**16.71**	**19.19**
Broadway Tributary Area		
S1	3.46	3.95
S2-5	3.05	3.47
S3-4B	6.60	8.11
Subtotal	**13.11**	**15.53**
Total	29.82	34.72

Acronyms/Abbreviations: DA = drainage area; cfs = cubic feet per second
KPFF Consulting Engineers, Hydrology Study – Providence Saint John's Health Center Phase II Project, August 2018.

Water Quality

The Project Site is currently developed with medical buildings, surface parking lots, and Mullin Plaza, with approximately 77 percent of the Project Site covered in impervious surfaces. Some urban pollutants, including oil, grease, fuel and rubber, are likely deposited onto the ground surface of the on-site parking lots and associated driveways, carried away by stormwater runoff during heavier storm events, and discharged to the municipal storm drain system. Water quality Best Management Practices (BMPs) currently implemented at the Project Site to minimize the generation and discharge of urban pollutants to the storm drain system include bioswales at Mullin Plaza and within the West Lot of the North Campus.

Santa Monica Beach and Santa Monica Bay, the receiving waters for stormwater runoff from the Project Site, are currently listed by Sections 303(d) and 305(b) of the Clean Water Act (CWA) as impaired for bacteria and debris. Therefore, discharges to these waters must meet Total Maximum Daily Load (TMDL) water quality standards specified in the CWA for these water bodies. TMDL requirements for indicator bacteria at Santa Monica Bay Beaches were adopted by the Los Angeles Regional Water Quality Control Board (LARWQCB) in December 2002 and approved by the U.S. EPA in June 2003, while implementation plans to meet these requirements were incorporated into the Basin Plan in 2006. TMDLs for debris in Santa Monica Bay were approved in 2012. Pursuant to the CWA, the current National Discharge Elimination System (NPDES) MS4 Permit for Los Angeles County includes effluent limitations and other provisions to implement the TMDLs for these water bodies.

Groundwater

According to the Preliminary Geotechnical Report prepared for the Project, groundwater was not encountered within the maximum 75-foot depth explored by on-site borings south of Santa Monica Boulevard. North of Santa Monica Boulevard, local seepage was encountered within two borings within or near the Project Site at various depths between 22 and 57 feet below the ground surface (bgs). The most recent borings encountered groundwater at depths between 110 and 115 feet bgs. The historic-high groundwater level is reported to be deeper than 40 feet below the ground surface at the site. (California Division of Mines and Geology, 1998)

Flooding

The Project Site and greater PSJHC Campus are designated as Zone X by the Federal Emergency Management Agency (FEMA) in Flood Insurance Rate Map (FIRM) #06037C1590F, dated September 26, 2008 (included in Appendix C in the Hydrology Study). Zone X denotes areas outside the 100-year floodplain, outside of the potential inundation area from the breach of a levee or dam, and an area of minimal flood hazard.

Seiches, Tsunamis and Mudflows

The Project Site is not located within the vicinity of a surface water body and thus are not subject to potential inundation from seiches (e.g., a temporary disturbance or oscillation in the water level of a lake or partially enclosed body of water resulting from seismic events or atmospheric pressure). Similarly, the Project Site is located over five miles from the Pacific Ocean to the west, and well outside the City's designated tsunami (seismically-induced wave) inundation area as defined by the

California Office of Emergency Services (CalOES) and identified in the City's tsunami zone map. (City of Santa Monica 2011). Lastly, the Project Site is located within a relatively flat area urbanized area well away from hillside or mountainous areas, and is not subject to mudflows.

4.10.3 Regulatory Framework

4.10.3.1 Federal Regulations

Clean Water Act

The Clean Water Act (CWA) was designed to restore and maintain the chemical, physical, and biological integrity of the Nation's waters. It authorizes federal, state, and local entities to cooperatively create comprehensive programs for eliminating or reducing the pollution of state waters and tributaries. The CWA amended previous federal water pollution legislation in 1972 with further amendments added in 1977 and 1987. Key provisions of the CWA address water quality standards and the establishment of the National Pollutant Discharge Elimination System (NPDES) for controlling the discharges of storm waters.

Section 303(d)(1) and TMDLs

Section 303(d)(1) of the CWA requires each state to identify the waters within its boundaries that do not meet water quality standards. Water bodies that do not meet water quality standards are considered impaired and are placed on the state's "CWA Section 303(d) List." For each listed water body, the state is required to establish a Total Maximum Daily Load (TMDL) of each pollutant impairing the water quality standards in that water body. A TMDL is the maximum amount of an impairing substance or stressor (e.g., pollutant) that a water body can receive and assimilate, and still safely meet water quality standards.

National Pollutant Discharge Elimination System

Section 402 of the CWA prohibits certain discharges of storm water containing pollutants except in compliance with a NPDES permit. In 1972, when the NPDES permit program was first established, most efforts at improving water quality focused on regulating pollutant discharges from known end-of-pipe "point sources" (pollutants easily traced to specific, discrete sources). However, the 1987 amendments to the CWA extended the NPDES program to encompass "non-point source" pollution found in storm water and dry weather runoff. In 1987, the NPDES permit began to regulate non-point source runoff to Municipal Separate Sanitary Storm Sewer (MS4 or "storm drain") systems, and since that time non-point source regulations under the NPDES permit program have been significantly revised and expanded. The NPDES Stormwater Program regulates storm water discharges from three potential sources: MS4 systems, construction activities, and industrial activities. To prevent harmful pollutants from being washed or dumped into an MS4, operators must obtain a NPDES permit and develop a storm water management program. Implementing programs to meet TMDLs defined under the NPDES Stormwater Program are performed at the regional level, as discussed below.

4.10.3.2 State

The California Environmental Protection Agency (CalEPA) is charged with developing, implementing, and enforcing the state's environmental protection laws. The SWRCB, a branch of Cal-EPA, is responsible for implementing the CWA through a range of water quality regulations.

1969 Porter-Cologne Water Quality Control Act (California Water Code)

This Act grants the SWRCB ultimate authority over state water rights and water quality policy and establishes nine Regional Water Quality Control Boards to oversee water quality on a day-to-day basis at the local/regional level. This Act is the basic water quality control law for California and works in concert with the federal CWA. The Porter-Cologne Act states that a RWQCB may include water discharge prohibitions applicable to particular conditions, areas, or types of waste within its regional plan. Section 13170 of the California Water Code also authorizes the SWRCB to adopt water quality control plans on its own initiative.

Construction General Permit

The SWRCB regulates storm water runoff from construction activities under Order No. 2009-009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ. Construction activities subject to the NPDES Construction General Permit include sites that disturb at least 1 acre, and small construction sites less than 1 acre but part of a larger common plan of at least 1 acre. The Order requires that, prior to beginning any construction activities, the permit applicant must obtain coverage under the General Construction Permit by preparing and submitting a Notice of Intent (NOI) and an adequate Storm Water Pollution Prevention Plan (SWPPP). The SWPPP has two major objectives: (1) to help identify the sources of sediment and other pollutants that affect the quality of storm water discharges and (2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in storm water and non-storm water discharges. Required elements of a SWPPP include: (1) site description addressing the elements and characteristics specific to the site; (2) descriptions of BMPs for erosion and sediment controls; (3) BMPs for construction waste handling and disposal; (4) implementation of approved local plans; (5) proposed post-construction controls, including a description of local post-construction erosion and sediment control requirements; and (6) non-storm water management. Additionally, the SWPPP must contain a visual monitoring program; a chemical monitoring program for "nonvisible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment.

2009 California Ocean Plan

Section 13000 of Division 7 of the California Water Code sets forth limits or levels of water quality characteristics for ocean waters of the state to ensure the reasonable protection of beneficial uses and the prevention of nuisance. Pursuant to California Water Code section 13263(a), the requirements of the NPDES program implement the Ocean Plan.

Sustainable Groundwater Management Act

On September 16, 2014, Governor Jerry Brown signed into law a three-bill legislative package, composed of AB 1739 (Dickinson), SB 1168 (Pavley), and SB 1319 (Pavley), collectively known as the Sustainable Groundwater Management Act (SGMA). The SGMA requires local governments

and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under the SGMA, these basins should reach sustainability within 20 years of implementing the required sustainability plans. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline (California Department of Water Resources, 2019a).

SGMA empowers local agencies to form groundwater sustainability agencies (GSAs) to manage basins sustainably, and requires those GSAs to adopt groundwater sustainability plans (GSPs) for crucial groundwater basins in California. According to the Act, GSA's must be formed by June 30, 2017, and they have until January 21 2022 to develop their GSPs (California Department of Water Resources, 2019a).

The Cities of Santa Monica, Los Angeles, Beverly Hills, and Culver City, as well as Los Angeles County, are all stakeholders in the local groundwater basin (e.g., the Santa Monica Basin). However, Santa Monica is the only entity currently pumping water from the basin, with groundwater providing approximately 75 percent of the City's total water needs. As such, Santa Monica has been designated the GSA for the Santa Monica Basin, established the Santa Monica Groundwater Sustainability Agency (SMBGSA) in June 2017, and will lead the other stakeholders in preparation of the required GSP (California Department of Water Resources, 2019b).

The Santa Monica Basin is designated by the SGMA Basin Prioritization Dashboard as a medium priority basin. Therefore, the SGMA requires that this basin reach sustainability by 2042 (California Department of Water Resources 2019c).

4.10.3.3 Regional

Water Quality Control Plan for the Los Angeles Region (Basin Plan)

The LARWQCB maintains the Basin Plan in accordance with federal and State Law. The Basin Plan establishes beneficial uses for surface and groundwater in the region, and sets forth the regulatory water quality standards to protect those designated beneficial uses. Where multiple designated beneficial uses exist, water quality standards must protect the most sensitive use. In cases where the Basin Plan does not contain a water quality objective for a particular pollutant, other criteria are used to establish a standard. Other criteria may be applied from SWRCB documents (e.g., the Inland Surface Waters Plan and the Pollutant Policy Document) or from water quality criteria developed under Section 304(a) of the CWA. Permits issued to control pollution (i.e. waste discharge requirements and NPDES permits) must implement Basin Plan requirements (i.e. water quality standards), taking into consideration beneficial uses to be protected.

Municipal Separate Storm Sewer System (MS4) NPDES Permit

As described above, the CWA establishes the NPDES Program to regulate the discharge of pollutants. Operators of MS4s are required to obtain permit coverage for municipal discharges of storm water and non-storm water to waters of the U.S. In Los Angeles County (except for the City of Long Beach), the permitting program is implemented by the LARWQCB under NPDES permit No. CAS004001 (Final Order No. R4-2012-0175), which went into effect in December 2012. This MS4 NPDES permit covers 86 permittees, which include the City.

The provisions of this MS4 NPDES permit are intended to develop, achieve, and implement a timely, comprehensive, cost-effective storm water pollution control program to reduce the discharge of storm water pollutants. Pursuant to the CWA, the MS4 NPDES permit includes effluent limitations and other provisions to implement the TMDLs for the water bodies that have been classified as impaired on the state's 303(d) List. The MS4 NPDES permit prohibits certain non-storm water discharges, and sets forth requirement for construction and operations activities as follows:

Construction

For all construction sites less than 1 acre that disturb soil, permittees must require the implementation of an effective combination of erosion and sediment control BMPs to prevent erosion and sediment loss, and the discharge of construction wastes. For all construction sites one-acre or more that disturb soil, permittees must require the preparation or submission an Erosion and Sediment Control Plan (ECSP) prior to the disturbance of land. The ESCP must contain appropriate site-specific construction site BMPs for controlling erosion during excavation and grading activities. ESCPs must include the elements of a SWPPP and must address methods to minimize footprint of disturbed area, methods to protect native vegetation and trees, sediment/erosion control, non-storm water controls (e.g., vehicle washing, dewatering), materials management (delivery and storage), spill prevention and control, and waste management (e.g., concrete washout/waste management; sanitary waste management). SWPPPs prepared in accordance with the NPDES Construction General Permit can be accepted as ESCPs.

Operation

The municipal NPDES MS4 Permit requires that permittees, including the City, implement operational storm water runoff controls for new development and redevelopment projects. Under the municipal NPDES MS4 Permit, these projects must be designed to minimize the footprint of the impervious area and to use LID strategies to disconnect the runoff from impervious area. Projects must be designed to retain, onsite, the storm water runoff resulting from either the 0.75 inch per 24-hour storm or the 85th percentile storm as defined in the Los Angeles County 85th percentile, 24-hour storm isohyetal map, whichever is greater. Storm water runoff may be retained onsite by methods designed to intercept rain water via infiltration, bioretention, and harvest and use. Examples of LID BMPs that may be employed to meet the storm water retention requirements include rain gardens, bioswales, pervious pavement, green roofs, and rainwater harvesting for use in landscape irrigation. As discussed below, to implement the requirements of the MS4 NPDES permit, the City's Urban Runoff Ordinance was updated in 2017.

Construction Dewatering General Permit

The LARWQCB also regulates discharges of groundwater from construction activities in the coastal watershed of Los Angeles County under Order No. R4-2013-0095 (NPDES Permit No. CAG994004), which was adopted on June 6, 2013. Discharges covered by this permit include, but are not limited to, treated or untreated groundwater generated from permanent or temporary dewatering operations. This permit applies to all construction dewatering activities conducted in the City; and includes effluent and receiving water limitations for metals and other potential contaminants in discharges from dewatering operations, as well as monitoring and reporting requirements. Similar to the Construction General Permit, the construction operator must submit a

NOI to discharge groundwater generated from construction dewatering operations in accordance with the requirements of this Permit. The NOI must include such information as the intended reuse or disposal of the wastewater, the nature of wastewater treatment, the discharge point of the wastewater, and the nature of the receiving waters.

4.10.3.4 Local

Santa Monica Watershed Management Plan

The City's 2006 Watershed Management Plan (WMP) is the primary planning document for the provision of drainage facilities and protection of water quality within the Watershed. The WMP evaluates the capacity and condition of the storm drain systems to provide adequate flood protection, and identifies projects, programs, strategies and funding mechanisms for maintaining the storm drain system and meeting storm water quality objectives. The WMP addresses the complete range of pollutants contained in urban runoff during both dry and wet weather.

The mission of the Watershed Management Plan (WMP) is "to restore a healthier balance between the urban environment and the natural ecosystem, including Santa Monica Bay, by reducing the pollution in urban runoff, reducing urban flooding, and increasing water conservation, recreational opportunities, open space, and wildlife and marine habitat." To support the Mission Statement, the following goals that have been established for the Plan: (1) reduce urban runoff pollution, (2) reduce urban flooding, (3) increase water conservation, (4) increase recreational opportunities and open space, and (5) increase wildlife and marine habitat. The WMP proposes a long-term vision, as well as the interim steps needed for Santa Monica to achieve an integrated and sustainable management of its urban water resources.

The WMP evaluates the capacity and condition of the storm drain systems to provide adequate flood protection, and identifies projects, programs, strategies and funding mechanisms for maintaining the storm drain system and meeting storm water quality objectives. The WMP addresses the complete range of pollutants contained in urban runoff during both dry and wet weather.

Santa Monica Land Use and Circulation Element (LUCE)

The LUCE is the land use and transportation planning document that governs existing and future land uses and establishes goals, policies, and development criteria for land uses and circulation in the City. Chapter 3.1 of the LUCE addresses Sustainability and Climate Change. The Chapter provides an overall approach to planning that addresses the range of environmental topics that are subject to climate change and the efficient use of non-renewable resources. Included within Chapter 3.1 are the following policies pertaining to water resource management and use:

> **Policy S6.2:** Implement the recommendations of the 2005 Santa Monica Urban Water Management Plan, including increasing water supply and conservation measures such as the City's no waste ordinance, landscape ordinance, wastewater control ordinance, and low-flow ordinance, and complete an assessment of the viability of additional urban runoff recycling.

Policy S6.3: Implement landscape water conservation requirements for new construction projects.

Policy S6.4: Continue to remediate the City's own contaminated groundwater supply.

Santa Monica General Plan Conservation Element

The Conservation Element (1975) sets forth policies and programs to ensure proper management and conservation of the City's natural resources, including water resources. The following are applicable policies and programs:

Policy 4: The City shall actively participate in the protection of water shed areas affecting Santa Monica water supplies.

Policy 6: The City shall protect the City's aquifers from contamination by controlling all forms of access or contact such as private wells, industrial dumping or any other type of intrusion into the aquifers which may affect the water quality.

Policy 11: The Public Works Department shall continue to maintain adequate storm drainage and runoff systems to accommodate flood control requirements.

Program 3: Monitoring programs shall be maintained to insure constant adherence to prevailing standards of water quality.

Program 5: The water division shall protect the potable water system from accidental or malicious introduction of contaminants.

SMMC Chapter 7.10 – Runoff Conservation and Sustainable Management Ordinance

The Runoff Conservation and Sustainable Management Ordinance became effective July 1, 2017 and updates the City's previous Urban Runoff Pollution Control Ordinance. The purpose of this ordinance is to address urban runoff pollution by reducing runoff volume and pollution from existing residential and non-residential properties and from future developments. The goal is to ensure that project maximize onsite storage and use, percolation, or evapotranspiration of runoff through a hierarchy of post-construction Low Impact Development (LID) requirements. This ordinance requires onsite rainwater collection and non-potable water use for properties 15,000 square feet or greater. Throughout operation, new developments are required to implement good housekeeping practices to minimize polluted runoff and prepare a Runoff Mitigation Plan.

SMMC Section 7.10.090 requires that that the applicants for development projects in the City submit a Runoff Mitigation Plan to the Department of Public Works for review and approval at the time of building permit application submittal. The Runoff Mitigation Plan must demonstrate that the project would be able to store and use for non-potable and/or potable purposes, infiltrate, or evapotranspire the calculated SWQDv (e.g., the water volume generated by a 0.75-inch twenty-four-hour storm event) through incorporation of LID design element(s) and Green Infrastructure (e.g., rainwater or stormwater harvesting for non-potable uses, temporary storage and infiltration into the ground, bio-retention-infiltration, bioswales, bio-infiltration pervious pavement), or alternatively, pay a Runoff Reduction Fee unless payment of such a fee is precluded by subsection (v) of Section 7.10.090. As previously state, the requirements of the Ordinance are compliant and

consistent with the MS4 NPDES permit that covers Los Angeles County including the City of Santa Monica.

Santa Monica Urban Watershed Management Program

The Urban Watershed Management Program, "Working for a Cleaner Bay," provides an overview of the requirements for the design, construction, and long-term management of new and existing developments in order to reduce urban runoff pollution. It is intended to assist the public in the preparation of the Urban Runoff Mitigation Plans that are required under the Urban Runoff Pollution Ordinance. It defines and illustrates appropriate LID BMPs; and also provide resources, contact information, ordinance cross-references and calculation sheets provides to be considered in the development of the Urban Runoff Mitigation Plan.

PSJHC Development Agreement

The 1998 PSJHC DA and subsequent amendments outline requirements for development at the PSJHC Campus, including at the Project Site. See the Project Characteristics and Project Design Features subsection below for applicable hydrology and water quality requirements.

4.10.4 Environmental Impacts

4.10.4.1 Thresholds of Significance

Appendix G of the 2019 State CEQA Guidelines provides screening questions that address potential impacts related to hydrology and water quality. These questions are listed below and are used as the significance thresholds by the City in this section, as is the applicable screening question for drainage from the "Utilities and Services" section of the Guidelines (see "f" below):

Would the project:

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

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

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

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

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

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

   (iv) Impede or redirect flood flows?

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

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

4.10.4.2 Methodology

As indicated previously, this section evaluates impacts on hydrology and water quality due to construction and operation of the Project. Issues addressed include drainage, water quality, and groundwater. The drainage analysis is based, in part, on the Hydrology Study included as Appendix I of this EIR.

Information in this section regarding the existing storm drain pipe sizes and locations is from the Hydrology Study, which utilizes available utility survey and record drawings provided by the jurisdictional agencies. The Hydrology Study uses the LA County's *HydroCalc Calculator* to determine the existing and proposed peak stormwater runoff rates for the 25 and 50-yr storm events for each of the Project Site's drainage subareas (it is industry standard to assess both the 25-year and 50-year events). *HydroCalc* is a model based on the Modified Rational Method (MODRAT), as outlined by the *Los Angeles County Public Works Department Hydrology Manual.* Inputs included, but were not limited to: impervious area; slope; the 25- and 50-year, 24-hour rainfalls depths for the Campus; soil type; and time of concentration. The input parameters are provided on the existing and proposed hydrology exhibits and in Section 3.0 of the Hydrology Study, while the HydroCalc output is included in Appendix D of the Hydrology Study.

The water quality analysis considers the change in impervious surfaces due to the project and compliance with applicable water quality regulations to minimize and/or avoid significant water quality impacts.

The groundwater level analysis is based on information from the Preliminary Geotechnical Study prepared for the Project included as Appendix E of this EIR, which in-turn is based on both borings conducted at the Project Site and published geotechnical and historical groundwater sources.

4.10.4.3 Project Characteristics

The Project would demolish the existing medical buildings, a vacant 10-unit apartment building and surface parking, and would develop in their place medical buildings, 30-34 visitor housing units as part of the proposed medical buildings, 10 replacement apartment units, structured parking, and enhanced vehicular and pedestrian circulation connections, for a net increase in building floor area of approximately 572,645 sf. The lowest subterranean floor level would be located five levels below ground or approximately 55 feet bgs in several of the buildings (S1, S3, S4, and S5), with construction requiring over approximately 919,000 cubic yards of grading.

In accordance with the City's Runoff Conservation and Sustainable Management Ordinance, an Urban Runoff Mitigation Plan would be prepared and implemented that would: (1) demonstrate that the Project would store and use, infiltrate, or evapotranspire the calculated SWQDv through LID design element(s) and Green Infrastructure (e.g., rainwater or stormwater harvesting for non-potable uses, temporary storage and infiltration into the ground, bio-retention-infiltration, bioswales, bio-infiltration pervious pavement), or alternatively, pay a Runoff Reduction Fee; and (2) identify and implement construction and post-construction stormwater quality BMPs (and/or

in-lieu fee payments), as well as steps for ongoing maintenance of BMPs. BMPs to be implemented could include, but would not necessarily be limited to: (1) physical improvements such as stormwater filtering systems for large paved areas, drain inlets with oil, debris, and silt traps, and natural biofilters such as grass swales and landscape areas; and (2) certain key nonphysical good housekeeping practices such as regular street sweeping and refuse collection, avoiding on-site washing of motor vehicles, and limiting pesticide and herbicide use. Specific BMPs would be identified at the time of building permit application submittal. Some of the BMPs that have been preliminarily discussed include:

- Green roofs, where feasible;
- Pervious paving materials, such as, pervious concrete and porous asphalt, pervious concrete and plastic modular and interlocking paving materials, and/or equivalent materials;
- Orienting roof rainwater and direct downspouts towards pervious surfaces, infiltration pits (drywells), French drains, or other structural BMPs rather than directly to impervious surfaces, such as driveways and parking lots (unless permeable and with the required storage capacity);
- Grade the parcel to divert flow to pervious areas; and
- Installing underground holding tanks at strategic locations for the capture and re-use and pumping this water to the landscaped areas. In initial discussions with Public Works staff, they appeared supportive of reviewing the Master Plan with PSJ and working together to figure out the best locations for these holding tanks.

Proposed Infrastructure Improvements

Drainage infrastructure improvements would be limited only to on-site improvements required to: (1) comply with applicable hydrology and water quality regulations (see above) and other City requirements; and (2) safely convey stormwater runoff from the Project Site to the existing curb gutters in Santa Monica Boulevard and Broadway.

4.10.4.4 Project Impacts

Drainage

Impact H/WQ-1: *Would the project:*

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

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

  (ii) Exceedance of the capacity of existing or planned stormwater drainage systems; or

  (iii) impede or redirect flood flows?

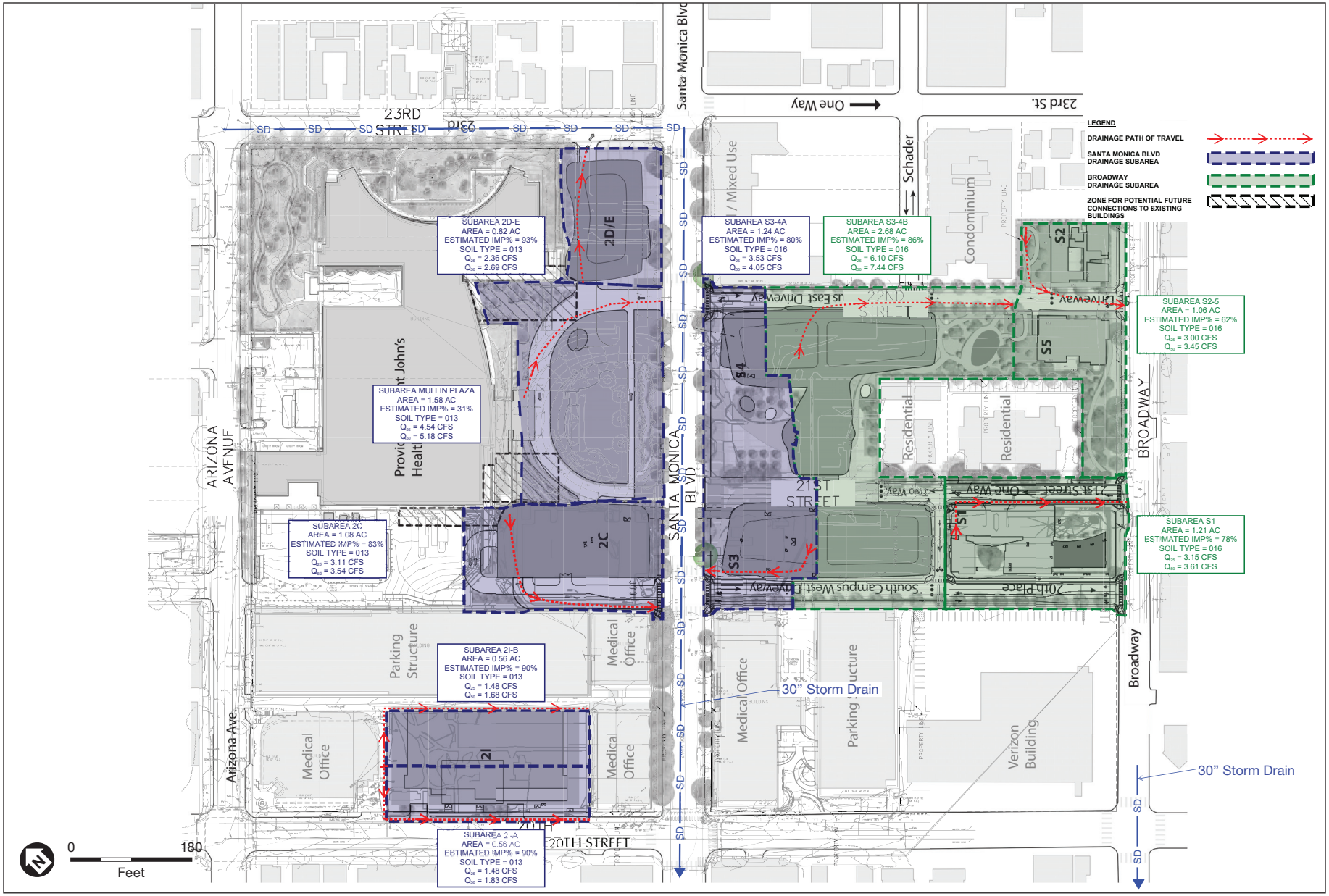
Impact Statement H/WQ-1: The Project would result in minor decreases rather than increases in both impervious surfaces and the overall amount of peak stormwater runoff flow from the Project Site. The Project would not substantially alter the existing drainage pattern of the site or area, including through either the alteration of the course of a stream or river or the addition of impervious surface, in a manner that would result in: (1) flooding on- or off-site; (2) exceedance of the capacity of existing or planned stormwater drainage systems; or (3) impedance or redirection of flows. Furthermore, the Project would not require or result in the relocation or construction of new stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project drainage impacts would be less than significant.

The Project would include demolition of the existing medical buildings and parking to develop new medical buildings and parking structures as well as new landscaped open space in their place. Drainage infrastructure improvements would be limited only to on-site improvements required to: (1) safely convey stormwater runoff from the Project Site to the existing curb gutters in Santa Monica Boulevard and Broadway; and (2) comply with City regulations (such as with the on-site stormwater reuse/retention and physical BMP requirements of the City's Runoff Conservation and Sustainable Management Ordinance). **Figure 4.10-2**, *Proposed Drainage Conditions,* identifies the existing storm drain infrastructure in the Project vicinity, several proposed small changes to the boundaries of the on-site drainage subareas affecting drainage areas 2C, 2D/E and Mullin Plaza, and the drainage paths of travel under the Project.

As indicated in **Table 4.10-3**, *Proposed Percent Imperviousness at the Project Site*, development of the proposed Project would increase impervious surfaces (i.e., landscaping/green space) within the Santa Monica Boulevard tributary drainage area from 66 to 71 percent, and would decrease impervious surface within the Broadway tributary area from 89 to 79 percent. Overall, imperviousness would decrease from 77 to 75 percent.

The changes in impervious conditions under the Project discussed above would result in changes in the peak runoff volumes from the Project Site. As indicated in **Table 4.10-4**, *Proposed 25- and 50-Year Peak Stormwater Flows from the Project Site*, the existing 25- and 50-year peak flows from the Santa Monica tributary drainage area would decrease by 0.21 and 0.22 cfs respectively, while the existing 25- and 50-year peak flows from the Broadway tributary drainage area would decrease by 0.86 and 1.03 cfs, respectively.[1] Overall, the 25- and 50-year peak flows would decrease by 1.07 and 1.25 cfs, respectively. Therefore, the Project would not create a demand for additional storm drain capacity. This analysis is conservative because it does not account for reductions in peak stormwater runoff flows that would result from Project compliance with: (the City's Runoff Conservation and Sustainable Management Ordinance which requires the on-site detention of runoff with reuse, infiltration or evapotranspiration of the SWQD.

[1] The peak runoff volumes from the Santa Monica Boulevard tributary drainage area would decrease under the Project, even though the amount of impervious surfaces in this tributary area would increase slightly, due to the decrease in drainage area for Site 2D/2E which would be added to a more pervious area (Mullin Plaza).



SOURCE: KPFF Consulting Engineers, Hydrology Report – Providence Saint John's Health Center Phase II Project, August 2018

Providence Saint John's Health Center Phase II Project

Figure 4.10-2
Proposed Drainage Conditions and Infrastructure

ESA

TABLE 4.10-3
PROPOSED PERCENT IMPERVIOUSNESS AT THE PROJECT SITE

	Existing		Proposed		
Drainage Subarea (#)	**Drainage Subarea (sf)**	**Percent Impervious (%)**	**Drainage Subarea (sf)**	**Percent Impervious (%)**	**Percent Change (%)**
Santa Monica Blvd Tributary Area					
2I-A	24,400	81	24,400	90	9
2I-B	24,400	82	24,400	90	8
2C	47,100	56	47,100	83	27
2D-E	44,000	83	35,700	93	10
Mullin Plaza	56,200	26	65,800	31	5
S3-4A	54,500	85	54,000	80	-5
Subtotal	**250,500**	**66**	**251,300**	**71**	**5**
Broadway Tributary Area					
S1	52,700	85	52,700	78	-7
S2-5	46,200	95	46,200	62	-33
S3-4B	118,000	89	117,200	86	-3
Subtotal	**216,900**	**89**	**216,100**	**79**	**-10**
Total	**467,400**	**77**	**467,400**	**75**	**-2**

Acronyms/Abbreviations: sf = square feet; cfs = cubic feet per second
KPFF Consulting Engineers, Hydrology Study – Providence Saint John's Health Center Phase II Project, August 2018.

TABLE 4.10-4
PROPOSED 25- AND 50-YEAR PEAK STORMWATER FLOWS FROM THE PROJECT SITE

	Existing		Proposed			
Drainage Subarea (#)	**25-Yr Flow (cfs)**	**50-Yr Flow (cfs)**	**25-Yr Flow (cfs)**	**25-Yr Flow Change (cfs)**	**50-Yr Flow (cfs)**	**50-Yr Flow Change (cfs)**
Santa Monica Blvd Tributary Area						
2I-A	1.48	1.83	1.48	0.00	1.83	0.00
2I-B	1.48	1.68	1.48	0.00	1.68	0.00
2C	3.11	3.54	3.11	0.00	3.54	0.00
2D-E	3.36	3.83	2.36	-1.00	2.69	-1.14
Mullin Plaza	3.71	4.23	4.54	0.83	5.18	0.95
S3-4A	3.57	4.08	3.53	-0.04	4.05	-0.03
Subtotal	**16.71**	**19.19**	**16.50**	**-0.21**	**18.97**	**-0.22**
Broadway Tributary Area						
S1	3.46	3.95	3.15	-0.31	3.61	-0.34
S2-5	3.05	3.47	3.00	-0.05	3.45	-0.02
S3-4B	6.60	8.11	6.10	-0.95	7.44	-0.67
Subtotal	**13.11**	**15.53**	**12.25**	**-0.86**	**14.50**	**-1.03**
Total	**29.82**	**34.72**	**28.75**	**-1.07**	**33.47**	**-1.25**

Acronyms/Abbreviations: DA = drainage area; cfs = cubic feet per second
KPFF Consulting Engineers, Hydrology Study – Providence Saint John's Health Center Phase II Project, August 2018.

With regard to altering drainage patterns or the course of a stream or river, runoff from the Project Site would continue to follow the same discharge paths and flow to the same existing storm drainage facilities as they currently do. Furthermore, there are no streams or rivers bisect the Project Site. Therefore, the Project would not change drainage patterns or the course of a stream or river.

As indicated above, Project drainage infrastructure improvements would be limited to on-site improvements required to: (1) safely convey stormwater runoff from the Project Site to the existing curb gutters in Santa Monica Boulevard and Broadway; and (2) comply with City regulations (such as with the on-site stormwater reuse/retention and physical BMP requirements of the City's Runoff Conservation and Sustainable Management Ordinance). No relocation or construction of new off-site stormwater drainage facilities would be required. The environmental effects associated with construction of the required on-site stormwater drainage infrastructure is already subsumed in the impact analysis for the proposed Project in other sections of this EIR (e.g., Sections 4.2, *Air Quality*; 4.5, *Archaeological/Paleontological Resources*; 4.13, *Noise and Vibration*; 4.17, *Transportation*, etc.). Construction of any required new connections to the existing off-site storm drain system could potentially temporarily interfere with traffic and circulation and generate some temporary noise during the construction period. However, implementation of the proposed Construction Management Plan (PDF-TR-1) would avoid any substantial disruption of traffic, bicycle and pedestrian circulation, and because any construction noise would be temporary, would occur within the rights-of-way of the existing streets within a largely commercial area, and would be required to comply with all applicable regulations (including the prohibition of nighttime construction activities), any associated construction noise would not exceed applicable noise thresholds at noise-sensitive uses.

Based on the above, the Project would not 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 that would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, or impede or redirect flows. Furthermore, the Project would not result in the relocation or construction of new stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects. Accordingly, Project drainage impacts would be less than significant.

Water Quality

Impact H/WQ-2**:** *Would the project:*

- *Violate any water quality standards or waste discharge requirements, or otherwise degrade surface or ground water quality?*
- *Substantially alter the existing drainage patterns of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would:*

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

  (ii) create or contribute runoff water which would provide substantial additional sources of polluted runoff?
- *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to inundation?*
- *Conflict with or obstruct implementation of a water quality control plan?*

Impact Statement H/WQ-2: The Project could potentially contribute pollutants in stormwater runoff during Project construction and operation. However, with compliance with applicable water quality regulations, the Project would not: (1) violate water quality standards or waste discharge requirements or otherwise degrade surface or groundwater quality; (2) create or contribute substantial additional sources of polluted runoff or substantial erosion or siltation; (3) risk release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone; or (4) conflict with or obstruct implementation of a water quality control plan. Therefore, Project water quality impacts would be less than significant.

As indicated previously, Santa Monica Beach and Santa Monica Bay, the receiving waters for stormwater runoff from the Project Site, are currently listed by Sections 303(d) and 305(b) of the CWA as impaired for bacteria and debris. Therefore, discharges to these waters must meet TMDL water quality standards specified for these water bodies. Pursuant to the CWA, the current NPDES MS4 Permit for Los Angeles County includes effluent limitations and other provisions (e.g., BMP requirements) to implement the TMDLs for these water bodies. Construction and operation of the Project has the potential to contribute pollutants to these water bodies as a result of stormwater and dry weather runoff from the Project Site. See below for analysis.

Construction Impacts

Construction activities would involve earthwork activities such as site clearing, grading, and excavation that would temporarily disturb soils, exposing them to potential erosion and mobilization from wind and rain. Other construction activities that could result in pollutant runoff include onsite watering activities to reduce airborne dust; delivery, handling, and storage of construction materials and wastes; the use of construction equipment with leaking oil and grease contaminants; storage and use of construction materials such as paints, solvents, cleaning agents, pesticides, herbicides, and metals may cause additional contamination. During storm events, contaminants on the site could be washed away by rain water that then carries these contaminants into the storm drain system.

Adverse effects on water quality during construction would be reduced through compliance with applicable regulatory requirements. Applicable regulatory requirements include compliance with NPDES MS4 Permit requirements, implementation of an NPDES Construction General Permit SWPPP and ECSP, all of which require the implementation of BMPs during construction to control sedimentation, erosion, and pollutant loading of runoff from construction sites. Typical construction BMPs include sandbagging, covering soil piles, street sweeping, preventing sediment laden runoff from entering storm drains with hay bales, controls on construction waste handling and disposal, a visual monitoring program, a chemical monitoring program for “nonvisible” pollutants, a sediment monitoring plan, non-storm water controls such as controls on vehicle washing, materials management, spill prevention, and minimizing the footprint of areas to be disturbed. Furthermore, Project construction activities would be required to comply with the with the requirements in the City’s Urban Runoff Pollution Ordinance as well as SCAQMD rules requiring the use of street sweepers (see Section 4.2, *Air Quality*).

Adverse effects on stormwater quality from any construction-related dewatering would be reduced through compliance with LARWQCB Construction Dewatering General Permit (NPDES Permit No. CAG994004). This permit outlines effluent and receiving water limitations for metals and other

potential contaminants in discharges from dewatering operations, monitoring and reporting requirements, and the requirement for the submission of an NOI to discharge construction-related groundwater, for review and approval by LARWQCB, which outlines how the permit requirements will be met.

The above-specified requirements have been formulated to comply with the TMDLs for Santa Monica Beach and Santa Monica Bay, and to avoid substantial erosion, sedimentation, and pollutant loading of stormwater runoff from construction sites.

Operations Impacts

With the exception of Mullin Plaza, the Project Site is currently subject to uncontrolled run-off during storm events (e.g., no implementation of stormwater quality BMPs), including from both the existing paved surface parking lots and the balance of the impervious and some of the pervious surfaces on the Project Site.

As indicated previously, the Project would replace the existing on-site medical and surface parking lots with new medical office uses and underground parking structures, resulting in a net increase in building floor area of approximately 574,645 sf, a reduction in impervious surfaces of approximately 2 percent, and a reduction in 25- and 50-year peak stormwater runoff flows of 1.07 and 1.25 cfs, respectively. Throughout the life of the Project, the proposed use would contribute to pollutants in stormwater runoff. However, the amount of pollutants in the runoff would not substantially increase from existing conditions for several reasons.

First, while building square footage, vehicular traffic, and human activity would increase under the Project, the primary source of urban pollutants in stormwater from the Project Site -the surface parking lots - would be replaced with structured parking. This would prevent oils, chemicals and heavy metals from vehicles in parking areas from being washed away by stormwater into the storm drains.

Second, the amount of impervious surfaces and the volume of peak stormwater runoff from the Project Site would decrease under the Project as a result of increased landscaping and plantings. This would reduce the overall amount of stormwater runoff from the Project Site.

Third, operational pollutants in stormwater runoff would be reduced under the Project through compliance with applicable regulatory requirements. Applicable regulatory requirements include: the City's urban runoff requirements, which require the retaining stormwater from either 0.75 inch per 24-hour storm or the 85th percent storm, whichever is greater; implementing LID BMPs (e.g., rain gardens, bioswales, pervious pavement, green roofs, and/or rainwater harvesting for use in landscape irrigation, etc.) to meet stormwater retention requirements; maximizing the on-site storage and use, percolation, or evapotranspiration of runoff through post-construction LID measures, implementation of structural and non-structural (good housekeeping) BMPs to minimize polluted runoff, and preparation of a Runoff Mitigation Plan. As indicated under the Project Characteristics subsection above, BMPs could include, but would not necessarily be limited to: (1) physical improvements such as stormwater filtering systems for large paved areas, drain inlets with oil, debris, and silt traps, and natural biofilters such as grass swales and landscape areas; and (2)

certain key nonphysical good housekeeping practices such as regular street sweeping and refuse collection, avoiding on-site washing of motor vehicles, and limiting pesticide and herbicide use. Specific BMPs would be identified at the time of building permit application submittal.

Fourth, the Project would not result in the infiltration of large quantities of pollutants to the groundwater as the Project would not include industrial facilities, landfills or other types of uses where such a potential would exist.

Lastly, dry weather runoff from the Project Site is conveyed to the City's SMURFF for treatment prior to being discharged to Santa Monica Beach and Santa Monica Bay. Therefore, most pollutants in the dry weather urban runoff from the Project Site would be removed prior to discharge to the receiving waters (with most of the pollutants in the stormwater runoff from the Project during wet weather conditions removed via compliance with existing regulations (including implementation of on-site BMPs) as discussed in the previous paragraph).

The above-specified requirements have been formulated to comply with the TMDLs for Santa Monica Beach and Santa Monica Bay, and to avoid substantial erosion, sedimentation, and pollutant loading of stormwater runoff during operation. Therefore, with compliance with existing regulations and implementation of the proposed BMPs, Project operation would not violate water quality standards or waste discharge requirements, result in substantial additional sources of polluted runoff, or otherwise substantially degrade water quality.

Release of Pollutants Associated with Floods, Tsunamis or Seiches

As indicated previously, the Project Site is not located within a 100-year floodplain, and is not subject to tsunamis or seiches. Therefore, the Project would not result in the potential for the release of pollutants due to inundation from floods, tsunamis, or seiches.

Consistency with the Water Quality Control Plan

As indicated previously, the LARWQCB maintains the Water Quality Control Plan for the Los Angeles Region (Basin Plan) in accordance with federal and State Law. The Basin Plan establishes beneficial uses for surface and groundwater in the region, and sets forth the regulatory water quality standards to protect those designated beneficial uses. In cases where the Basin Plan does not contain a water quality objective for a particular pollutant, other criteria are used to establish a standard. Other criteria may be applied from SWRCB documents (e.g., the Inland Surface Waters Plan and the Pollutant Policy Document) or from water quality criteria developed under Section 304(a) of the CWA. Permits issued to control pollution (i.e. waste discharge requirements and NPDES permits) must implement Basin Plan requirements (i.e. water quality standards), taking into consideration beneficial uses to be protected.

Project construction and operational activities would comply with all applicable water quality regulations, including but not limited to: (1) NPDES MS4 Permit requirements, implementation of an NPDES Construction General Permit SWPPP and ECSP, and SCAQMD rules, all of which require the implementation of BMPs during construction to control sedimentation, erosion, and pollutant loading of stormwater runoff from construction sites; (2) LARWQCB Construction Dewatering General Permit (NPDES Permit No. CAG994004) requirements for any construction

dewatering; and (3) NPDES MS4 Permit requirements, City urban runoff (including stormwater retention) and LID BMP requirements, and City Runoff Mitigation Plan requirements. These requirements have been formulated to comply with the TMDLs for Santa Monica Beach and Santa Monica Bay, and to avoid substantial erosion, sedimentation, and pollutant loading of stormwater runoff from development during construction and operation. Therefore, with compliance with these requirements, the Project would comply with the Basin Plan.

Conclusions

Per the analysis above, the Project would not: (1) violate any water quality standards or waste discharge requirements, or otherwise degrade surface or ground water quality; (2) substantially alter the existing drainage patterns of the site or area which would create or contribute runoff water that would provide substantial additional sources of polluted runoff or result in substantial erosion or siltation on- or off-site; (3) risk the release of pollutants due to inundation from floods, tsunamis or seiches; or (4) conflict with or obstruct implementation of a water quality control plan. Therefore, Project water quality impacts would be less than significant.

Groundwater

Impact H/WQ-3: *Would the project:*

- *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*
- *Conflict with or obstruct implementation of a sustainable groundwater management plan?*

Impact Statement H/WQ-3: The Project would slightly decrease impervious surfaces at the Project Site, would not include groundwater withdrawals (other than, potentially, small amounts of groundwater associated with any required dewatering), would not overlay a designated groundwater recharge area, and would not result in a significant demand for water. Furthermore, a SGP does not yet exist for the Santa Monica Basin. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that it would impede sustainable groundwater management, and would not conflict with or obstruct implementation of an SGP. Project groundwater impacts would be less than significant.

As indicated previously, according to the Preliminary Geotechnical Report included as Appendix E of this EIR, groundwater was not encountered within the maximum 130-150-foot depth explored by on-site borings at the Project Site south of Santa Monica Boulevard. North of Santa Monica Boulevard, the most recent borings encountered groundwater at depths between 110 and 115 feet bgs. The historic-high groundwater level is reported to be deeper than 40 feet below the ground surface at the site. (California Division of Mines and Geology, 1998)

Also as indicated in the Preliminary Geotechnical Report, since groundwater was not encountered within the likely excavation depths (only groundwater seepage), significant dewatering using wells is not anticipated to be required, and a system of trenches and sumps may be adequate if seepage is encountered. Although not anticipated, the Preliminary Geotechnical Report recommends that the need for dewatering and a sub-floor drainage system should be assessed in the required Final Geotechnical Report based on the current groundwater conditions underlying each proposed building site as determined by new borings.

Regardless of whether dewatering is required during Project construction or operation, the dewatering would not be significant as it would not involve significant withdrawal of groundwater.

Also, the Project would not include the installation of new groundwater wells, and given that overall impervious surface would decrease from 77 to 75 percent of the Project Site area under the Project, the Project would not interfere substantially with groundwater recharge. In fact, depending on the type of stormwater detention mechanism implemented to comply with the City's on-site stormwater detention requirements, infiltration could potentially increase slightly under the Project. Furthermore, the Project Site does not overlay a designated groundwater recharge area or the City's aquifer protection zone. In addition, while the City obtains its potable water from multiple sources including groundwater, and while the Project would increase the demand for City-provided water, this demand for water would be less than significant (see Section 4.19, *Water Supply*, of this EIR for further discussion).

Lastly, a SGP does not yet exist for the Santa Monica Basin.

Therefore, the Project would not: (1) substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin; or (2) conflict with or obstruct implementation of an SGP. Project groundwater impacts would be less than significant.

4.10.4.5 Cumulative Impacts

The geographic context for the analysis of cumulative impacts associated with hydrology and water quality is Santa Monica Bay Watershed. Cumulative development occurring within the Watershed area would have the potential to contribute to increased pollutant loading in urban runoff, change localized drainage patterns and effect the consumption of water resources.

The City manages and regulates drainage flows and water quality through its plans, programs and ordinances. As a permittee under the MS4 NPDES permit, the City must ensure that discharges to Santa Monica Bay are compliant with the regulating permit; and the City is obligated to implement LID BMPs and other methods to reduce the entry of pollutants into the City storm drain system and to reduce the overall amount of urban runoff entering Santa Monica Bay.

The Construction General Permit and the City's Runoff Conservation and Sustainable Management Ordinance require development and implementation of a SWPPP for all construction sites over 1 acre to mitigate potential impacts to water quality from polluted storm water runoff. Additionally, the City's Ordinance requires the implementation of LID BMPs to reduce pollutants in storm water runoff. Further, projects throughout the City would be required to meet the City's Runoff Conservation and Sustainable Management Ordinance requirements, including the requirement for all new development and redevelopment sites to store and use for non-potable purposes, infiltrate, or evapo-transpire (through landscape elements) site-generated runoff during a 0.75-inch or 85th percentile storm event through incorporation of BMPs or alternatively pay an urban runoff reduction fee. Compliance with existing regulations would prevent violation of water quality standards and minimize increases in urban runoff and the potential for contributing additional sources of polluted runoff.

In addition, the City manages potential impacts on groundwater through City's regularly updated Urban Water Management Plans and Sustainable Water Master Plan. Continued implementation of water conservation measures as part of these plans ensures that the groundwater is managed such that the groundwater aquifer is not withdrawn beyond the safe yield.

It should be noted that some of the cumulative development occurring will replace existing development that was constructed under less stringent standards than being applied today (including the proposed Project). As a result, some new development would decrease urban runoff as compared to existing conditions, and would also incorporate current BMP requirements that would result in improved water quality as compared to existing conditions.

Therefore, the City manages its drainage and water quality in a manner that is consistent with applicable regulatory requirements, regulations and plans. All cumulative development would be consistent with LARWQCB requirements, City plans and ordinances that address hydrology and water quality, and the Basin Plan, that have been formulated to be protective of the TMDL's of the receiving waters and thus consistent with the Basin Plan.

Furthermore, as described in the project level analysis above, hydrology and water quality impacts of the Project would be limited. The Project Site is an infill site located within an urban developed area that would continue to be connected to the municipal storm drain system. The Project would be integrated into the existing drainage system, without altering off-site drainage systems, and would be subject to the implementation of LID BMPs to minimize pollutant runoff and/or in-lieu fees per the Runoff Pollution Ordinance. Therefore, the contribution of the Project to cumulative hydrology and water quality impacts would be less than cumulatively considerable.

Finally, the construction of any required drainage infrastructure improvements associated with the cumulative projects could potentially result in significant cumulative environmental effects. However, the Project would not contribute considerably to any such effects because: (1) no off-site drainage improvements are required for the Project; and (2) any environmental effects associated with the construction of the required/proposed on-site drainage improvements would be minimal and are already subsumed in the impact analysis for the other environmental topics evaluated in this EIR.

Based on the above, cumulative hydrology and water quality impacts would be less than significant.

4.10.5 Mitigation Measures

Project impacts would be less than significant with compliance with applicable regulations. No mitigation measures are required.

4.10.6 Level of Significance After Mitigation

No mitigation measures are required; impacts would be less than significant.

4.11 Land Use and Planning

4.11.1 Introduction

This section evaluates the consistency of the Project with City adopted land use goals, programs, policies and regulations, as well as regional plans and related planning policy documents. The analysis is primarily focused on an assessment of consistency with the City's Land Use and Circulation Element (LUCE 2010, Revised 2015); the City's Hospital Area Specific Plan (HASP 1988, Revised 1998); the PSJHC Development Agreement (DA 1998) and subsequent amendments; the City's Zoning Ordinance; and Southern California Association of Government's (SCAG's) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS 2016). The analysis also evaluates proposed changes to the HASP and DA.

4.11.2 Environmental Setting

4.11.2.1 Existing Conditions

Local Context

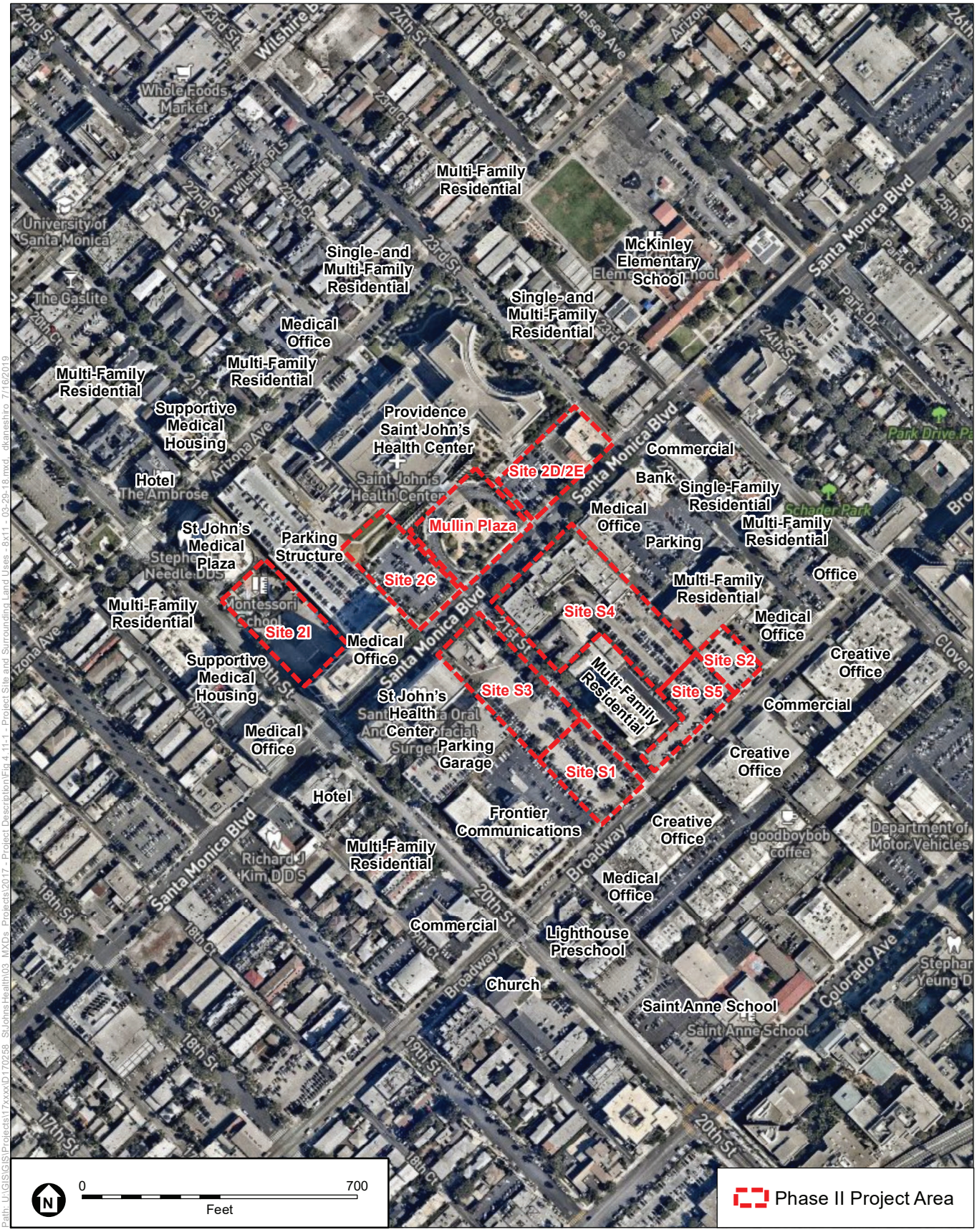
The Project Site and greater Providence Saint John's Health Center (PSJHC) Campus are located in the City's Mid-City Neighborhood, which is geographically defined by Washington Avenue to the north, Santa Monica Boulevard to the south, Centinela Avenue to the east, and 5th Street to the west. The Mid-City Neighborhood is defined by a mix of uses, including residential, commercial, office and medical uses (including the PSJHC and SM-UCLA hospitals).

Mid-City is intersected by three major boulevards (Broadway, Santa Monica Boulevard and Wilshire Boulevard), and has an array of neighborhood- and regional-serving businesses and amenities within a short walk of most homes. The commercial services not only provide the neighborhood with products and services, but they also offer an assortment of employment opportunities for area residents. The PSJHC and SM-UCLA hospitals are major employers in Mid-City, and draw thousands of workers and patients to their locations every day.

The residential component of the neighborhood is made up of a large number of well-maintained mid-20th century apartments and more recent 21st century contemporary Californian Spanish-Mediterranean and modern design style. A number of single-family homes remain as well - with California bungalows and duplexes sprinkled throughout the area.

Surrounding Land uses

The Project Site and surrounding land uses are depicted on **Figure 4.11-1**, *Project Site and Surrounding Land Uses.* As shown in this figure and described in Chapter 2*, Project Description*, and Chapter 3, *General Description of Environmental Setting*, the area surrounding the PSJHC Campus contains a mixture of commercial (including medical) buildings on 20th Street, Arizona Avenue, Santa Monica Boulevard and Broadway and multifamily residential buildings on Arizona Avenue, 21st Street, and 23rd Street as described in more detail below.



SOURCE: DigitalGlobe, 2016 (Aerial).

Providence Saint John's Health Center Phase II Project

Figure 4.11-1
Project Site and Surrounding Land Uses

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As also indicated in Figure 4.11.1, the Project Site is comprised of nine Phase II Development Sites that are located north and south of Santa Monica Boulevard (with the PSJHC North Campus and South Campus), with four of the development sites in the North Campus and five in the South Campus. The existing land uses and square footage associated with each of the Phase II Development Sites are summarized below and described in more detail in Chapter 2 and **Table 2-1**, *Existing Improvements/Development on Phase II Sites Summary.*

North Campus

The North Campus is generally bounded by Arizona Avenue to the north, 23rd Street to the east, Santa Monica Boulevard to the south, and 20th Street to the west. Uses along Arizona Avenue north of the North Campus include a four-story hotel (The Ambrose) and primarily includes multi-family and single-family residential ranging from one to four stories. Uses along 23rd Street to the east of the North Campus, between Arizona Avenue and Santa Monica Boulevard, consist mainly of multi-family residential uses, ranging from one to two stories, with interspersed single family residential uses. A restaurant is located at the northeast corner of 23rd Street and Santa Monica Boulevard. Uses along Santa Monica Boulevard, south of the North Campus include a bank and medical offices, the South Campus (John Wayne Cancer Institute and two temporary MRI modular buildings, and the Saint John's Health Center Foundation Building. Uses along 20th Street to the west of the North Campus, between Santa Monica Boulevard and Arizona Avenue, include healthcare, convalescent homes, and medical office uses (ranging from one to five stories) and multi-family residential (ranging from two to three stories).

Site 2C

Site 2C is located along Santa Monica Boulevard as shown in Figure 4.11-1 and is approximately 45,200 square feet of land area. This site is currently developed with a surface parking lot (the West Lot). The West Lot is used for visitor and patient vehicles that are dropped off with the valet in Mullin Plaza entry driveway (described further below).

Development immediately adjacent to the east of Site 2C is the Mullin Entry Plaza and northeast is the Providence Saint John's Hospital building. Immediately to the north is a portion of the North Campus containing the mechanical plant for the hospital building. Immediately to the west is a seven-story/84-foot-tall medical office building (2021 Santa Monica Boulevard) and a 5 story/43-foot-tall parking structure, both of which share a property line with Site 2C. Immediately to the south is Santa Monica Boulevard, with the South Campus located across Santa Monica Boulevard further to the south.

Site 2D/2E and Mullin Plaza

Site 2D/E is located at the northwest corner of 23rd Street and Santa Monica Boulevard as shown in Figure 4.11-1 and has approximately 39,000 square feet of land area. Site 2D/E is developed with a surface parking lot (Lot C) and a two-story concrete office building of 10,800 square feet located at 2221 Santa Monica Boulevard with surface parking that serves the office building. Lot C is used for physician parking. The entire office building is occupied by the Saint John's Health Center Foundation and its associated surface parking is used by Foundation visitors and employees. The office building has no setbacks from the property lines along Santa Monica Boulevard or 23rd Street.

The Mullin Plaza site is located on a portion of 2121 Santa Monica Boulevard between Sites 2C and 2D/E as shown on Figure 4.11-1 and has approximately 52,800 square feet of land area. The Mullin Plaza site includes the main vehicular access to the PSJHC with a one-way semi-circle driveway with the ingress driveway from Santa Monica Boulevard on the east and the egress driveway to Santa Monica Boulevard on the west. Within the semicircular driveway, there is an approximately 17,700-square-foot open space for use by patients, visitors, and employees. There are also landscaped areas located to the northeast and northwest of the Entry Plaza driveways and a landscaped area located along Santa Monica Boulevard in front of the valet driveway.

Development immediately to the east of Site 2D/E is 23rd Street, with a one-story commercial restaurant building (2301 Santa Monica Boulevard), and a three-story apartment building (1347 23rd Street) across 23rd Street. Immediately to the north is the existing Providence Saint John's Hospital Building (2121 Santa Monica Boulevard), a four-story/92-foot-tall building. Immediately to the west of Site 2D/E is the Mullin Plaza Site. Immediately to the west of the Mullin Plaza Site is Site 2C, which is currently improved with surface parking (the West Lot). Immediately to the south is Santa Monica Boulevard, with the existing two-story John Wayne Cancer Institute building (2200 Santa Monica Boulevard) which is proposed for demolition as part of the Project, a one-story brick building (2232 Santa Monica Boulevard), a four-story brick medical office building (2222 Santa Monica Boulevard), a one-story stone-clad and concrete medical laboratory building (2216 Santa Monica Boulevard) and, a six story medical office building (2020 Santa Monica Boulevard) located across Santa Monica Boulevard.

Site 2I

Site 2I is located at 1339 20th Street midblock on 20th Street between Arizona Avenue and Santa Monica Boulevard, as shown in Figure 4.11-1 and has approximately 45,000 square feet of land area. Site 2I is developed with the existing Child & Family Development Center, which consists of a two-story commercial building with a basement totaling approximately 34,670 square feet and a one-story approximately 585-square-foot pool house. The Child & Family Development Center provides mental health outpatient services, a therapeutic preschool, and various child development education and outreach resources. The building is also home to PSJHC's Early Childhood Directions Program (child care), which is currently licensed to provide childcare to 61 children. The building is set back five feet from the lot line along 20th Street. Site 2I contains three parking stalls used for loading.

Development immediately to the south of Site 2I is a twelve-story/168-foot-tall medical building (2001 Santa Monica Boulevard) and a seven-story/84-foot-tall medical building (2021 Santa Monica Boulevard). Its associated 43-foot-tall parking garage and private alley are located east of Site 2I. Immediately to the north is a five-story/86-foot-tall medical office building (1301 20th Street) which shares a property line with Site 2I. Immediately to the west is 20th Street, with a four-story medical office building (1919 Santa Monica Boulevard), a two-story physical health rehabilitation center building (1338 20th Street), and a one-story physical health rehabilitation center building (1320 20th Street) further to the west across 20th Street. Immediately to the south is a twelve-story/168-foot-tall medical office building (2001 Santa Monica Boulevard).

South Campus

The South Campus encompasses several properties within the City block generally bound by Santa Monica Boulevard to the north, 23rd Street to the east, Broadway to the south, and 20th Street to the west. Uses along Santa Monica Boulevard north of the South Campus include the seven-story and twelve-story medical buildings (2001 Santa Monica Boulevard and 2021 Santa Monica Boulevard), the North Campus (parking lots, Mullin Plaza, and the single-story Saint John's Health Care Foundation, and the four-story Providence Saint John's Health Center). Uses along 23rd Street to the east of the South Campus, between Santa Monica Boulevard and Broadway, include a commercial use at the southeast corner of Santa Monica Boulevard and 23rd Street, single-family and multi-family residential (ranging from one to three stories), and parking associated with office use at the northeast corner of 23rd Street and Broadway. Uses along Broadway south of the South Campus include primarily one-story creative office/studios, a one-story commercial building, a restaurant, a two-story medical office building, and a one-story dog and cat hospital. Uses along 20th Street to the west of the South Campus, between Broadway and Santa Monica Boulevard, include a single-story restaurant and office uses, multi-family residential (ranging from one to two stories), and a four-story hotel (Gateway Hotel).

Sites S1 & S3

The S1 and S3 Sites are located on the west side of the South Campus between Santa Monica Boulevard and Broadway as shown in Figure 4.11-1. The S1 and S3 Sites are currently improved with surface parking lots (Lot B and Lot I) and temporary modular buildings that were installed on the site during Phase I for PSJHC MRI facilities (2,675 square feet). Lot B is used for visitor and patient vehicles that are dropped off with the valet in Mullin Entry Plaza. Lot I is used for employee/staff parking. The surface parking lot is set back approximately eight feet from the lot line for most of the frontage along 21st Street, with a portion set back a greater distance behind a landscaped area.

Development near Sites S1 and S3 includes Site 2C located directly to the north across Santa Monica Boulevard. To the west along Santa Monica Boulevard is the six-story/110-foot-tall medical office building (2020 Santa Monica Boulevard) and across Santa Monica Boulevard to the northwest is the twelve-story/168-foot-tall medical office building (2001 Santa Monica Boulevard) and the seven-story/84 feet medical office building (2021 Santa Monica Boulevard). To the east, across 21st Street, are the following existing buildings: (a) a two-story medical building that is the current home of the John Wayne Cancer Institute (2200 Santa Monica Boulevard) and is proposed for demolition as part of the Project, (b) a vacant two-story residential apartment building (1417 21st Street) that is owned by PSJHC and proposed for demolition as part of the Project, (c) a one-story residential apartment building (1423 21st Street) that is not a part of the PSJHC Campus, and (d) an eight-story/84-foot-tall senior housing building (1441 21st Street) called Geneva Plaza that is also not a part of the PSJHC Campus. To the west is a six-story/110-foot-tall medical office building (2020 Santa Monica Boulevard), a four-story/40-foot-tall parking structure at 1414 21st Street, and the two- to three-story/70-foot-tall Frontier Communications building at 2001 Broadway. To the south, directly across Broadway, is a one-story commercial building containing the Back on Broadway restaurant (2024 Broadway) and a two-story commercial building

containing Bruder Releasing, Inc. and the Weinzoff Chiropractic and Wellness Center (2020 Broadway).

Site S2

Site S2 is located on the southeast portion of the PSJHC Campus on two lots (2207 and 2213 Broadway) as shown in Figure 4.11-1. Site S2 is developed with a portion of a surface parking lot that is used by PSJHC (Lot H). Lot H spans Sites S2, S4, and S5 and is used for employees/staff parking. Lot H has no set back from the lot line along Broadway from the lot line along 21st Street.

Immediately to the east of Site S2 is a surface parking lot used by the one-story commercial building located at 2101-2225 Broadway. Immediately to the north is a three-story/42-foot-tall condominium building (1440 23rd Street). To the west is Site S5, currently a surface parking lot used by PSJHC (a portion of Lot H). To the south, across Broadway, is a one-story creative office/studio building at 2218 Broadway.

Site S4

Site S4 is located at 1417-1423 21st Street, 2200 Santa Monica Boulevard, and 2201 Broadway, as shown on Figure 4.11-1. Site S4 is developed with the existing two-story John Wayne Cancer Institute Building (2200 Santa Monica Boulevard), an existing vacant ten-unit multifamily apartment building (1417-1423 21st Street), and a paved surface parking lot (a portion of Lot H) that is used by PSJHC. Lot H, which spans Sites S2, S4, and S5, contains a total parking capacity of 304 vehicles and is used for employees/staff parking. The John Wayne Cancer Institute Building (2200 Santa Monica Boulevard) has approximately 51,055 square feet of floor area located within two above-grade stories and one subterranean level. The existing John Wayne Cancer Institute building is set back between 13 feet and 32 feet from Santa Monica Boulevard and approximately seven feet from 21st Street. The existing vacant ten-unit multifamily apartment building at 1417-1423 21st Street is set back from 21st Street approximately 15 feet. This building has been vacant since the Northridge Earthquake.

Development to the east of Site S4 includes a one-story medical office building at 2210 Santa Monica Boulevard. To the north, across Santa Monica Boulevard, is the Mullin Entry Plaza and Site 2D/E (currently developed with a surface parking lot, Lot C). Immediately to the west are Sites S1 and S3, which are currently occupied by the temporary MRI modular buildings and surface parking Lots B and I. Immediately to the south is Site S5, which is currently improved with surface parking Lot H.

Site S5

Site S5 is located at 2201 Broadway and 1453 21st Street as shown on Figure 4.11-1. This site is developed with a surface parking (a portion of Lot H) that is used by PSJHC. Lot H, which spans Sites S2, S4, and S5, contains a total parking capacity of 304 vehicles and is used for employees/staff parking.

Development to the east of Site S5 includes Site S2, which is currently improved with surface parking (a portion of Lot H) used by PSJHC. Immediately to the north of Site S5 is Site S4, which is currently improved with surface parking (a portion of Lot H) used by PSJHC and the John Wayne

Cancer Institute. Immediately to the west is Geneva Plaza (1441 21st Street), an eight-story/84-foot-tall senior housing building. To the south, across Broadway, is a one-story commercial building (2202 Broadway) and another one-story creative office/commercial building (2112 Broadway).

4.11.3 Regulatory Framework

4.11.3.1 State

Senate Bill 375 (SB 375)

The adoption of California's Sustainable Communities and Climate Protection Act (SB 375) (Steinberg, Chapter 728, Statutes of 2008) on September 30, 2008 aligns the goals of regional transportation planning efforts, regional greenhouse gas (GHG) reduction targets, and land use and housing allocations. SB 375 requires metropolitan planning organizations (MPOs) such as SCAG to adopt a sustainable communities strategy (SCS) or alternative planning strategy (APS) within their regional transportation plan to demonstrate the achievement of GHG reduction targets.

4.11.3.2 Regional Plans

Southern California Association of Governments

SCAG is the designated MPO for six Southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial), and is federally mandated to develop plans for regional transportation, land use and growth management, hazardous waste management, and air quality. The City is one of many jurisdictions comprising the SCAG jurisdictional area.

SCAG has adopted a number of strategies that support implementation of SB 375, evolving sustainability goals and smart growth strategies. The key principles of these strategies include: locating new employment centers and neighborhoods near major transit systems to reduce vehicle miles traveled and greenhouse gas emissions; creating mixed use density within walking distance of transit stations to reduce automobile travel; focusing future growth in urban centers and existing cities to reduce vehicle miles traveled and preserve rural and other natural areas; and preserving established single-family neighborhoods and existing natural and green spaces by accommodating new development with existing urbanized areas.

Regional Transportation Plan/Sustainable Communities Strategy

On April 7, 2016, SCAG's Regional Council adopted the 2016 - 2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS, 2016) the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The RTP/SCS presents the land use and transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's challenges. The RTP/SCS includes nine goals that pertain to economic development, mobility, accessibility, travel safety, productivity of the transportation system, protection of the environment and health through improved air quality, energy efficiency, and land use and growth patterns that complement the state and region's transportation investments, and security of the regional transportation system.

The RTP/SCS serves as the region's major planning document for sustainable growth in the region, with policies and strategies that aim to reduce GHG emissions. SCAG's overarching strategy is to encourage land use density in existing urban area, providing neighborhoods with efficient and plentiful public transit, abundant and safe opportunities to walk, bike and pursue other forms of active transportation, and preserving more of the region's remaining natural lands. SCAG's RTP/SCS envisions compact communities as the general land use growth pattern for the region.

Under this strategy, vehicle miles traveled (VMT), congestion, and GHG emissions will be reduced. The RTP/SCS specifically encourages future growth to occur within existing high quality transit areas (HQTA), which are described as generally walkable transit districts or corridors that are within 0.5 mile of a major transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Exhibit 5.1 of the RTP/SCS identifies the Project Site as being located within an HQTA, an area proposed for the focus of new housing or jobs.

The RTP/SCS also contains baseline socioeconomic and demographic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. (SCAG's RTP/SCS projections are discussed further in Section 4.14, *Population, Housing, and Employment*, of this EIR.)

4.11.3.3 Local Plans and Zoning

City of Santa Monica General Plan

The City of Santa Monica General Plan is the fundamental planning policy document of the City, providing a "blueprint" for the design of the City. The purpose of the General Plan is to identify the appropriate location of land uses, the basic design and function of circulation, open space, and infrastructure policies, as well as public service needs. The General Plan consists of the seven state mandated elements: Land Use and Circulation Element (2010); Housing Element (2013); Open Space Element (2001); Scenic Corridors Element (1975); Noise Element (1992); Conservation Element (1975); and Safety Element (1995). In addition, the Santa Monica General Plan also contains a Historic Preservation Element (2002).

Of these, the Land Use and Circulation Element (LUCE 2010, Revised 2015) provides land use transportation goals and policies that address the development of land uses in the City, and that are the focus of the consistency analysis below. The remaining six elements address specific environmental topics and have been addressed where applicable in other sections of the EIR. Refer in particular to Sections 4.1, Aesthetics (Conservation Element); Section 4.4, Historical Resources (Historic Preservation Element); Section 4.7, Geology and Soils (Safety Element); 4.9, Hazards and Hazardous Materials (Safety Element); Section 4.13, Noise and Vibration (Noise Element); Section 4.14, Population and Housing (Housing Element); and 4.16 Fire Protection (Safety Element).

Land Use and Circulation Element

The LUCE of the City's General Plan was adopted July 6, 2010 and revised July 24, 2015. The LUCE is the land use and transportation planning document governing existing and future land uses in the City. The LUCE encompasses the community's vision for Santa Monica's future and

establishes goals, policies, and development criteria for land uses and circulation in the City. The goals of the LUCE are to preserve the City's neighborhoods, reduce GHG emissions, improve mobility and circulation, and encourage the creation of new housing near transit. The LUCE establishes ten districts; each district serving a distinct function depending on its historic uses, access to transportation, and role in the overall distribution of uses within the City.

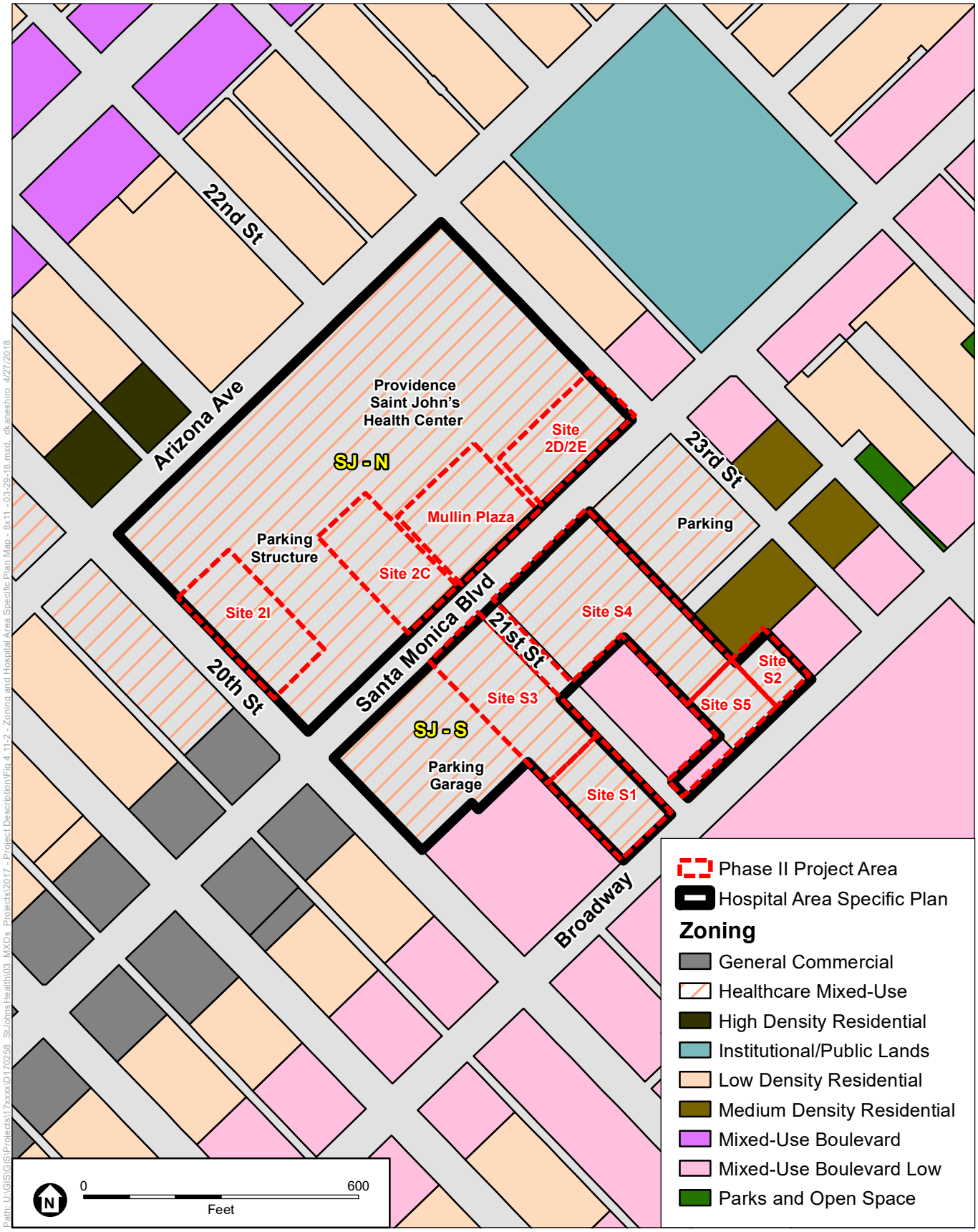
The LUCE designates the Project Site as lying within the Healthcare Mixed Use (Healthcare) District, which is a land use designation within the broader Employment and Commerce designation (LUCE, p. 2.1-29). The Healthcare District includes the PSJHC, the Santa Monica-UCLA Medical Center (SM-UCLA), and the area immediately around and between these facilities. The Healthcare District allows for a variety of uses designed to support PSJHC and SM-UCLA, including hospital, medical office, pharmacies, residential care, rehabilitation and outpatient clinics, affordable, workforce and market-rate housing targeted at hospital employees, extended stay lodging for patient families, and supporting retail uses (LUCE p. 2.1-57). The LUCE did not establish new development standards for the Healthcare District. Instead, the LUCE deferred to the standards contained in the Hospital Area Specific Plan (HASP) (LUCE, pp. 2.1-57 and 2.6-48). The LUCE further states that the HASP will be amended to address the evolving needs of the healthcare community with expanded medical office uses and outpatient services, along with retail and non-medical services. The amended HASP would incentivize the creation of affordable and workforce housing, protect residential properties in the Healthcare District, and transform the District into a cohesive environment that is supported by transit, pedestrian paths, open spaces, and plazas (LUCE, p. 26-47).

The LUCE includes specific goals and policies that address future development, including health care, in the City. Key goals and policies that are most relevant to the Project are listed in the policy consistency analysis below.

Hospital Area Specific Plan

The HASP (HASP 1988, Revised 1998) was adopted in 1988 and revised in 1993 and 1998 concurrently with the PSJHC Development Agreement and 1998 Certified EIR, discussed below. The HASP includes the PSJHC, SM-UCLA, and surrounding neighborhoods and is generally bordered by Wilshire Boulevard to the north, Euclid Avenue to the west, Broadway to the south, and Chelsea Avenue to the east. The HASP establishes two SJ Overlays for the PSJHC: SJ-N and SJ-S (HASP, p. 57 and Map 13). SJ-N is located between 20th Street to the west, Arizona Avenue to the north, 23rd Street to the east, and Santa Monica Boulevard to the south. SJ-S is generally located between 20th Street to the west, Santa Monica Boulevard to the north, 23rd Street to the east, and Broadway to the south. (See HASP Objective Number 12, below.) The SJ-N and SJ-S Overlays correspond with the North and South Campuses, respectively, and are depicted in **Figure 4.11-2**, *Zoning and Hospital Area Specific Plan Map*.

The intent of the HASP is to: address issues of neighborhood concern, address the needs of modern hospitals in a competitive health care environment, develop basic zoning and development standards, identify parcels for rezoning, and identify other programs which should be implemented in the area. The contents of the HASP consist of legal requirements for a specific plan; background



SOURCE: City of Santa Monica, ESA, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.11-2
Zoning and Hospital Area Specific Plan Map

ESA

information about the study area and the hospitals Master Plans; an analysis of projected gross development of the area; consistency of the HASP objectives with the General Plan land use, circulation, conservation and open space element, noise element, scenic highways element, and public safety element; and an implementation program.

The HASP includes the following land use objectives that are applicable to the Project:

- **Objective Number 1:** Ensure that development in the hospital area balances the need for medical facilities and uses while protecting residential uses in the area.
- **Objective Number 2:** Preserve the residential character of the neighborhoods surrounding the hospitals.
- **Objective Number 6:** Support Land Use Element (LUE) policies for residential districts, Wilshire Boulevard, and Santa Monica Boulevard. The HASP does not propose any changes to LUE policies for these areas.
- **Objective Number 7:** Encourage the use of architectural materials and design which will be compatible with surrounding uses in the hospital area.
- **Objective Number 8:** In conjunction with its review of development projects, the City should consider the influence of lighting on adjoining properties.
- **Objective Number 9:** New structures should provide covenants requiring that they be maintained in good conditions with attention to their appearance.
- **Objective Number 10:** Consideration should be given to development incentives/regulatory provisions to protect the potentially-architecturally significant building at 2125 Arizona Avenue.
- **Objective Number 12:** SJ Overlays covering the Saint John's property are to be established within the CP District in order to best implement the Saint John's Master Plan. All parcels located between 20th Street on the west, Arizona Avenue on the north, 23rd Street on the east, and Santa Monica Boulevard on the south, will be included in the SJ-N Overlay. All parcels bearing CP zoning and located between 20th Street on the west, Santa Monica Boulevard on the north, 23rd Street on the east and Broadway on the south, will be included in the SJ-S Overlay.

The HASP further states that the development standards, including heights and floor areas, for the SJ-N Overlay shall be established in a Development Agreement between the City of Santa Monica and Saint John's. The development standards, including heights and floor area, for the SJ-S Overlay shall be established in a new South Campus Master Plan required by the Development Agreement between the City of Santa Monica and Saint John's (HASP, p. 57).

Other applicable objectives of the HASP are discussed in Sections 4.20, *Solid Waste*; 4.7, *Geology and Soils*; and 4.9, *Hazards and Hazardous Materials*, of this EIR.

Development Agreement and Amendments

The Development Agreement

As described in Chapter 2, *Project Description*, the Development Agreement (approved in 1998, amended in 2011 and 2017) provides for two phases of development of the PSJHC. Phase I, which was completed in 2014 (with the exception of a subterranean garage), involved the demolition and reconstruction of PSJHC core hospital facilities on the North Campus in a smaller configuration than previously existed. As part of Phase I, PSJHC core hospital facilities were reduced from 662,000 square feet of floor area to 475,000 square feet of floor area, and the PSJHC licensed beds were reduced from 501 to a total of 266. The DA provides for ongoing community benefits that PSJHC is required to provide through the term of the DA (until 2053). These Community Benefits include an annual Community Benefit Plan which incorporates a Santa Monica Community Access Plan (SMCAP), that provides cash support and healthcare and related services to Santa Monica residents and the Santa Monica Malibu Unified School District. The 2011 Amendment to the DA required PSJHC to provide additional community benefits, including implementation and maintenance of a parking management plan (PMP) and transportation demand management (TDM) program; implementation of neighborhood protection provisions developed in response to input from the community (such as restrictions on the use of sirens, valet parking restrictions, and community outreach procedures); financial contributions to study the feasibility of forming a Transportation Management Association (TMA) in the Healthcare District; and financial contributions towards enhancements to the 17th Street/Santa Monica College Station of the Expo Light Rail Line.

Per the 2017 Amendment to the DA, the DA requires that a Phase II Master Plan be prepared by PSJHC and approved by the City Council, prior to the approval of the DRPs for the proposed Phase II Project buildings. Phase II of development includes the Project's proposed development within the North Campus (Sites 2C, 2D/2E, 2I) and the PSHHC South Campus (Sites S1 through S5). Permitted uses are defined in Sections 3.3.1(a) through 3.3.1(s) of the DA and include the following: (1) Child & Family Development Center; (2) Day Care; (3) Education & Conference Center; (4) Health & Wellness Center; (5) Health Related Services (such as pharmacy, optical supplies and hearing aids, alternative medicines, and health food store); (6) Hospital/Health Care Uses; (7) Internal Phase II Overpasses (within the North Campus); (8) Medical Office; (9) Medical Research Facilities; (10) Multi-Family Housing (consisting of rental housing units); (11) Neighborhood Commercial Uses (such as banks, general retail, and restaurants); (12) Parking; (13) Restaurants; (14) Senior Housing; (15) Underground Tunnel; and (16) Visitor Housing. The Phase II Master Plan is a comprehensive master plan that governs the Phase II portion of the PSJHC, including building placement, building height, setbacks, stepbacks, parking, location of uses, vehicular and pedestrian circulation, open space, and phasing and timing of improvements over an approximately 20-year buildout. The overriding purpose of the Project is to provide an integrated health delivery system that offers a full continuum of care to people who reside or work in Santa Monica and surrounding communities. Such a system will continue to provide traditional health services as well as extended services which focus on outpatient care, prevention and community health education. These services shall be integrated throughout Phase I and Phase II. (DA, Recital Section O.)

Vested Floor Area, Height, Setbacks

The DA's provisions for Phase II establish vested rights for up to 799,000 square feet of development on the North and South Campuses, of which not more than 744,000 square feet of floor area shall be above-grade. (DA, Sections 3.4.1) Combined vested floor area for the PSJHC campus is illustrated in **Table 4.11-1**, *Summary of Vested Uses and Floor Area for the PSJHC Campus*.[1]

TABLE 4.11-1
SUMMARY OF VESTED USES FLOOR AREA FOR THE PSJHC CAMPUS

Use	Max. Floor Area/Units Per DA
Hospital/ Health Care	354,000 sf*
Medical Research Facilities	140,000 sf
Health & Wellness Center	90,000 sf
Education & Conference Center	70,000 sf
Child & Family Development Center	50,000 sf
Medical Office	50,000 sf
Health Related Services	40,000 sf
Day care	25,000 sf
Restaurants	10,000 sf
Neighborhood Commercial Uses	5,000 sf
Visitor Housing	100 units
Multifamily Replacement Housing	10 units

SOURCE: PSJHC, 2018.

For the North Campus, the DA, Sections 3.5.2, 3.7.3(a), and 3.5.3(a-c) respectively, establish Height and minimum building setbacks for each of the following three Phase II Development Sites Site 2C, Site 2D/E, and Site 2I. The maximum building heights are as follows: Site 2C, maximum height of 95 feet; Site 2D/E, maximum height of 75 feet; and Site 2I, maximum height of 70 feet. Building setbacks at Site 2C are 6 feet from Santa Monica Boulevard and 20 feet from the east side of the parking garage. Building setbacks for Site 2D/E are 6 feet from Santa Monica Boulevard and 20 feet from 23rd Street, and building setbacks for Site 2I are 6 feet from 20th Street and 20 feet from the parking garage (north side), the 2001 Santa Monica building, and 1301 Arizona Avenue building. No equivalent setbacks or building heights have been established for the South Campus. The DA further provides that PSJHC may shift Vested Floor Area between these three sites, subject to City approval provided that the aggregated Vested Floor Area of 402,500 square feet remains unchanged (DA Section 3.7.3(a)). For the South Campus, the DA establishes an overall Vested Floor Area of 396,500 square feet (DA Section 3.7.3(b)). Per the DA, the height

[1] Note that Table 4.11-1 is the same as Table 2-2, Summary of Select Phase II Vested Uses, in Chapter 2, Project Description of this EIR.

limits for the South Campus buildings are to be established in the Phase II Master Plan (DA Section 3.6.1).

Vested Uses

As presented in 4.11-1, the DA also specifies Vested Uses for Phase II of the North and South Campuses (DA Section 3.7.2(a)-(b)). As indicated in Table 4.11-1, vested uses range from 5,000 square feet for Neighborhood Commercial Uses to 354,000 square feet for Hospital/Health Care and 100 units of visitor housing. In addition, the DA also states that any floor area for Medical Offices shall be deducted from and reduce the amount of floor area of the Vested Use for Hospital/Health Care (354,000 square feet). It should be noted that the maximum floor area presented on Table 4.11-1 may not exceed the total cap of 799,000 square feet for the Project Site.

Zoning Ordinance

The Santa Monica Zoning Ordinance (Zoning Ordinance), Divisions 1 through 5 of Article 9 of the Santa Monica Municipal Code (SMMC), is a tool for the City to implement the General Plan. The Zoning Ordinance implementing the LUCE was adopted by the City Council on June 23, 2015 and went into effect on July 24, 2015. As shown in Figure 4.11-2, above, the majority of the Project Site lies within the Healthcare Mixed-Use (HMU) District and a small portion of Site S5 (approximately an area of 7,200 square feet) is within the Mixed-Use Boulevard Low (MUBL) District.

Article 9, Division 2, Chapter 9.13, Employment Districts, includes the HMU District. As stated in Zoning Ordinance Section 9.13.010, the HMU District provides for the future orderly expansion of the City's hospitals and related facilities to meet the needs of the community and region while protecting the surrounding residential neighborhoods. The HMU District fosters the evolving needs of the healthcare community with expanded medical office uses and outpatient services along with retail and non-medical services. Permitted uses in the HMU District include hospitals and clinics, social service centers, offices, restaurants, general retail sales, single- and multi-family residential, and research and development. For the HMU District, the Zoning Ordinance establishes a maximum Tier 2-With Provision of Community Benefits, FAR of 2.5 and height limit of 5 stories/47 feet. Community Benefits include affordable housing, a mix of unit sizes, payment of a transportation impact fee, provision of open space or payment of fees, and incorporation of transportation demand measures. Minimum setbacks include 5 feet from residential areas and a minimum upper-story stepback above the first story of 5 feet for street-facing façades. In addition, a daylight plane is required where adjacent to residential districts, starting at 25 feet in height directly above the abutting parcel line so as to permit daylight on adjacent residential properties (Zoning Ordinance Section 9.13.030C). Landscaping is required along setback areas adjoining streets and along interior parcel lines adjacent to a Residential or Mixed- Use District (Zoning Ordinance Section 9.13.030D).

Article 9, Division 2, Chapter 9.11, Mixed-Use and Commercial Districts, includes the MUBL District. As stated in Zoning Ordinance Section 9.11.010, the MUBL District is intended to facilitate the transformation of sections of boulevards into vibrant, highly walkable areas, with broad, pedestrian-friendly sidewalks, trees, landscaping, and local-serving uses with new buildings that step down in relation to the adjacent low density neighborhoods. Permitted uses in the MUBL

District include residential, residential care facilities, adult day care, child care, community gardens, park and recreation facilities, and restaurants. For the MUBL District, the Zoning Ordinance establishes a minimum parcel size of 7,500 square feet; a minimum parcel width of 50 feet; a minimum parcel depth of 150 feet; a maximum Tier 2-With Provision of Community Benefits, FAR of 1.75; and a height limit of 3 stories/36 feet; a maximum FAR of 2.0 and height limit of 47 feet for 100 percent affordable housing projects. Other development standards include a maximum building footprint Tier 2 – With Provision of Community Benefits of 35,000 square feet; provisions for Active Commercial Design; provisions for Pedestrian Oriented Design; a minimum setback of 10 feet from residential areas; and provisions for a daylight plane where adjacent to residential districts, starting at 25 feet in height directly above the abutting parcel line.

Although the HMU District Land Use Regulations and Development Standards are generally applicable to the PSJHC Campus, the DA overrides the Zoning Ordinance during the term of the DA until 2053. The DA would establish the community benefits to be provided as part of a project as summarized in Chapter 2, Project Description. These community benefits will be finalized prior to approval of the Project as part of the DA negotiation process between the City and applicant.

4.11.4 Environmental Impacts

4.11.4.1 Thresholds of Significance

Appendix G of the State CEQA Guidelines provides screening questions that address potential impacts related to land use and planning. The CEQA guidelines provides that lead agencies may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects, and the use of Appendix G as a significance threshold is routinely sanctioned by the courts (although such use is not mandatory). These questions are listed below and are used as the significance thresholds by the City in this section:

Would the project:

a. Physically divide an established community?

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

Non-applicable Checklist Questions:

Checklist Question (a) Divide an Established Community: The Project would not physically divide an established community and would not conflict with a habitat conservation plan or natural community conservation plan. The Project Site is located within the HASP – the North and South Campuses would be subject to an amended DA, Phase II Master Plan, and DRP process at the time the application is filed for the Project Buildings. The Project would provide infill development on the Project Site within the North and South Campuses that are surrounded by hospital, medical office, parking, commercial, and residential uses that are similar to those proposed for the Project. No new roads or design features would separate or otherwise divide existing land uses; rather the proposed circulation improvements (such as private driveways, pedestrian paths, and widened sidewalks) would enhance existing vehicular and pedestrian circulation. Therefore, question (a) does not need to be further addressed in the EIR.

4.11.4.2 Methodology

The State CEQA Guidelines Section 15125(d) requires that an EIR discuss project inconsistencies with applicable general plans, specific plans, and regional plans. For purposes of this analysis, the Project is considered consistent with regulatory plans if it meets the general intent of the plans and/or would not preclude the attainment of their primary goals. The rule of general plan consistency is that the project must at least be compatible with the objectives and policies of the general plan. (Sequoyah Hills Homeowners Assn. v. City of Oakland (1993) 23 Cal.App.4th 704, 717–718 [29 Cal. Rptr. 2d 182] (Sequoyah Hills); Friends of Lagoon Valley, supra, 154 Cal.App.4th at p. 817.) "[S]tate law does not require precise conformity of a proposed project with the land use designation for a site, or an exact match between the project and the applicable general plan. Instead, a finding of consistency requires only that the proposed project be 'compatible with the objectives, polices, general land uses, and programs specified in' the applicable plan. The courts have interpreted this provision as requiring that a project be '"in agreement or harmony with"' the terms of the applicable plan, not in rigid conformity with every detail thereof." (*San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656, 678 [125 Cal. Rptr. 2d 745] (San Franciscans).) To reiterate, the essential question is "whether the project is compatible with, and does not frustrate, the general plan's goals and policies." (Napa Citizens, supra, 91 Cal.App.4th at p. 378.)

Under CEQA, the criterion for determining significance with respect to a land use plan emphasizes the creation of a significant environmental impact as a result of conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect, recognizing that an inconsistency with a plan, policy, or regulation does not necessarily equate to a significant physical impact on the environment. The analysis of potential land use impacts of the Project therefore considers consistency with adopted plans, regulations, and development guidelines that regulate land use on the Project Site and whether any such inconsistencies are tied to physical impacts on the environment associated with the Project.

Plan consistency with other environmental topics is addressed in other sections of the Draft EIR. Refer to Sections 4.2 to 4.20, as applicable.

4.11.4.3 Project Characteristics

Phase II Development Summary

As more fully described in Chapter 2, *Project Description*, the Project includes the Phase II Master Plan, the Phase II Development Program consisting of ten Project buildings with related infrastructure improvements and open space on the Project Site, amendments to the HASP, DA amendments, a vesting tentative subdivision map, a street vacation, a Child Care Implementation Plan for Phase II, and an amended Santa Monica Community Access Plan.

The Phase II Master Plan establishes the basic parameters and vested rights guiding development of the Project including, without limitation: (1) building placement, (2) building height, (3) building uses, (4) building floor areas, (5) building setbacks, (6) building stepbacks, (7) parking (both subterranean and above-grade), (8) location of uses, (9) vehicular and pedestrian circulation, (10) open space, and (11) a Phase II Project Phasing Plan. The Phase II Master Plan allows for 10 Phase

II Project buildings and associated infrastructure and open space improvements (Phase II Development Program). The Phase II Development Program would result in up to 682,700 square feet of new floor area or a net increase of up to 572,645 square feet with maximum building heights ranging from 36 feet to 105 feet (depending on site) as summarized in **Table 4.11-2**, *Existing and Proposed Phase II Development*, below.

The Phase II Development Sites includes Sites 2I, 2C, 2D/E and Mullin Plaza within the North Campus and Sites S1, S2, S3, S4, and S5 within the South Campus. These sites are depicted in **Figure 2-3**, *Phase II Site Plan,* and listed in **Table 2-3**, *Phase II Development Summary*, in Chapter 2. Proposed setback distances are shown in **Figure 2-4,** *Proposed Setbacks*. A summary description of the Phase II Development Program for each of the Development Sites and buildings is provided below. As noted in Chapter 2, for some of the buildings, the sum of the maximum floor area for the Vested Uses under the DA that may occur within the proposed building exceeds that overall building's maximum floor area in order to establish some flexibility for establishing the eventual location and not-to-exceed amount of certain Vested Uses within the Phase II buildings. In addition, for some Vested Uses, the sum of the Vested Use allowed in all Project buildings exceeds the overall vested square footage for the Vested Use. This allows some flexibility as to what portion of that Vested Use will be located in the various Project buildings.

However, in no event will any Phase II building exceed the maximum floor area identified for the building, nor will any Phase II Vested Use exceed the total vested square footage for the use as provided in the DA, as amended. Each of the Project buildings would be designed at the time the DRP application is filed. The DRP application would be reviewed by the Planning Commission and/or the Architectural Review Board. The Planning Commission would also review the DRP application for consistency with the Master Plan.

Community Benefits

As described in Chapter 2, development of the Project would provide the following Community Benefits:

- Child Care Implementation Plan – to expand the existing child care program.
- Amended Santa Monica Community Access Plan – would modify the existing SMCAP to ensure access to community-oriented facilities, such as the Education & Conference Center and Health & Wellness Center.
- Provide lectures for the community and meeting space for community organizations in the Education & Conference Center.
- Implement a TDM program for Phase II development that provides incentives for employees to reduce single-occupancy vehicle trips.
- Provide new and enhanced open space areas including Mullin Plaza, Saint John's Square, Woodland Garden, Sun Garden, South Garden, and an extensive Wellness Walk throughout the PSJHC Campus.

TABLE 4.11-2
EXISTING AND PROPOSED PHASE II DEVELOPMENT

Development Site	Existing Development	Existing Floor Area	Existing Building Height	Phase II Building Name	Proposed Max. Building Floor Area	Proposed Maximum Height	Net Change in Floor Area/Units
S1	Parking	n/a	n/a	Child & Family Development Center/Day Care	34,500 sf	47 feet	34,500 sf
S2	Parking	n/a	n/a	Multifamily Housing	10 units plus 800 sf commercial	36 feet	10 units plus 800 sf
S3	Two Temporary MRI Modular Buildings and Parking	2,675 sf	1 floor	West Ambulatory Care & Research Building	123,000 sf	89 feet	120,325 sf
S4	John Wayne Cancer Institute 10-units	51,055 sf 10 units (10,270 sf)	2 floors above-grade, 1 subterranean level	Education & Conference Center and East Ambulatory Care & Research Building	199,000 sf	105 feet	147,945 sf (-10 units)
S5	Parking	n/a	n/a	Visitor Housing	38,000 sf (30-34 units)	73 feet	38,000 sf
	Parking			Saint John's Cafe	900 sf	17 feet	900 sf
2C	Parking	n/a	n/a	West Ambulatory & Acute Care Building	123,350 sf above-grade[a] 6,150 sf below-grade	95 feet	129,500 sf
2D/E	St. John's Health Center Foundation and Parking	10,800 sf	2 floors	East Ambulatory & Acute Care Building	65,800 sf above-grade[b] 16,400 sf below-grade	75 feet	71,400 sf
2I	Child & Family Development Center	34,670 sf	2 floors above-grade, 1 basement level	20th Street Medical Building	73,300 sf	60 feet	38,045 sf
	CFDC Pool house	585 sf	1 floor				
Mullin Plaza	Entry Plaza	n/a	n/a	Mullin Plaza Café	1,500 sf	17 feet	1,500 sf
Total		110,055 sf			682,700 sf 10 units		572,645 sf

NOTES:
a Includes 9,350 sf of Pedestrian Connections
b Includes 3,300 sf of Pedestrian Connections
SOURCE: PSJHC, ESA 2018

- Enhanced pedestrian, bicycle, and vehicular access both to and throughout the PSJHC Campus.
- Replacement of 10 units of multifamily housing to include two units for low-income housing.

Phase II Development Sites

Detailed descriptions of the Phase II development sites are included in Chapter 2. Below is a summary of the site.

Site S1: Child & and Family Development Center

The Child & Family Development Center building would include Child & Family Development Center use and Daycare use as shown in Table 2-3. The maximum floor area of the building would be 34,500 square feet and the maximum height would be 47 feet. The Child & Family Development Center would be set back a minimum of three feet from the property line along Broadway to allow a minimum of 15 feet from the curb as shown on Figure 2-4.

Site S2: Multifamily Housing

Site S2 would include Multifamily Housing, consisting of ten two-bedroom residential units and up to 800 square feet of Neighborhood Commercial Uses along the south façade. Of the ten residential units, two units would be for low-income households. The building would have a maximum height of 36 feet and could include up to two levels of subterranean parking beneath the Multifamily Housing. The Multifamily Housing would be set back a minimum of three feet from the property line along Broadway to allow a minimum distance of 15 feet from the curb. The Multifamily Housing would also set back a minimum of 20 feet from the property line of the existing multifamily residential building located at 1440 23rd Street to provide a buffer between the two buildings.

Site S3: West Ambulatory Care & Research Building

The West Ambulatory Care & Research Building includes Hospital/Health Care uses, Medical Research Facilities, and ground-level Restaurant, Neighborhood Commercial Uses, or Health Related Services as shown in Table 2-3. Among other uses, the West Ambulatory Care & Research Building would be the new home for the John Wayne Cancer Institute. The maximum floor area of the building would be 123,000 square feet and the maximum height would be 89 feet. As shown on Figure 2-4, the West Ambulatory Care & Research Building would be set back a minimum of 6 feet from the property line along Santa Monica Boulevard to allow a minimum of 15 feet from the curb.

Site S4: Education & Conference Center and East Ambulatory Care & Research Building and Saint John's Café

The Education & Conference Center and East Ambulatory Care & Research Building includes Hospital/Health Care uses, Education & Conference Center uses, Health and Wellness Center uses, and/or Medical Research Facilities, ground floor Health-Related Services, Restaurant, or Neighborhood Commercial Uses as shown in Table 2-3. The maximum floor area of the building would be 199,000 square feet and the maximum height of the building would be 105 feet.

As shown on Figure 2-4, the Education & Conference Center and East Ambulatory Care & Research Building would be set back a minimum of six feet from the property line along Santa Monica Boulevard to allow a minimum of 15 feet from the curb and set back a minimum of 30 feet from the northern property line of the existing multifamily residential units located at 1427 and 1433 21st Street.

Also within Site S4, a new open space area, Saint John's Square, would be created along Santa Monica Boulevard between the S3 and S4 buildings. This open space would have a minimum dimension of 110 feet (north/south) by 150 feet (east/west) that is envisioned to include outdoor dining and outdoor classes and provide sufficient space for special events such as health fairs. Saint John's Square would include space for Saint John's Café, that will include up to 900 square feet of Restaurant or Neighborhood Commercial Uses with a maximum height of 17 feet.

Site S5: Visitor Housing

The Visitor Housing building would include up to 34 units (maximum of 38,000 square feet of floor area). The Visitor Housing building would have a maximum height of 73 feet. As shown on Figure 2-4, the Visitor Housing building would be set back a minimum of three feet from the property line along Broadway to allow a minimum distance of 15 feet from the curb. In addition, two new open spaces would be created as part of the Site S5 development: the Sun Garden and the South Garden.

Site 2C: West Ambulatory & Acute Care Building

The West Ambulatory & Acute Care Building would contain Hospital/Health Care Uses or Medical Research, Health/Wellness Center uses, ground-level Health-Related Services, Restaurant, or Neighborhood Commercial Uses, and Pedestrian Connections as summarized in Table 2-3. The maximum floor area of the building would be 123,350 square feet above grade (including 9,350 sf of pedestrian connections) and 6,150 square feet below grade. The maximum building height would be 95 feet. As shown on Figure 2-4, the West Ambulatory & Acute Care Building would be set back from Santa Monica Boulevard a minimum of six feet from the property line and set back a minimum of 20 feet from the adjacent medical/parking garage buildings (2021 Santa Monica Boulevard and its parking garage to the west).

Site 2 D/E: East Ambulatory & Acute Care Building and Mullin Plaza

The East Ambulatory & Acute Care Building (2D/E) would include Hospital/Health Care Uses or Medical Research, Health/Wellness Center uses, ground floor Health-Related Services, Restaurant, or Neighborhood Commercial Uses, and Pedestrian Connections as shown in Table 2-3. The maximum floor area of the building would be 65,800 square feet above grade (including 3,300 sf of pedestrian connections) and 16,400 square feet below grade. The maximum height of the building would be 75 feet. As shown on Figure 2-4, the East Ambulatory & Acute Care Building would be set back from Santa Monica Boulevard a minimum of six feet from the property line and set back from 23rd Street a minimum of 20 feet from the property line, and setback from the adjacent existing Phase I CSS Building a minimum of 40 feet.

As part of development on Site 2D/E, the existing open space within the Mullin Plaza driveways would be expanded to approximately 23,000 square feet and redesigned to facilitate more active

use of the plaza open space by employees, patients, visitors, and neighbors. The redesigned plaza may include a commercial kiosk, the Mullin Plaza Café, that would include Restaurant or Neighborhood Commercial Uses as shown in Table 2-3. The maximum floor area of the building would be 1,500 square feet and the maximum height would be 17 feet (one floor).

Site 2I: 20th Street Medical Building

As shown in Table 2-3, the 20th Street Medical Building would contain ground floor Health-Related Services, Restaurant, or Neighborhood Commercial uses, bike parking and maintenance area, a lobby, and limited vehicle parking (located behind the ground floor commercial space), and two floors of Medical Office, Medical Research, Hospital/Health Care, and/or Child Family Development uses. The maximum floor area of the building would be 73,300 square feet. The maximum height of the building would be 60 feet. As shown on Figure 2-4, the 20th Street Medical Building would be set back from 20th Street a minimum of six feet from the property line and set back a minimum of 20 feet from the adjacent medical/parking garage buildings (2001 Santa Monica Boulevard to the south, 2001/2021 Santa Monica Boulevard parking garage to the east, and 1301 Arizona Avenue to the north).

Land Use Approvals

Implementation of the Project would require the following:

- Certification of the Final EIR by the City Council, and adoption of Statement of Overriding Considerations as necessary
- City Council approval of amendments to the HASP
- City Council approval of the amended Development Agreement
- City Council approval of the Child Care Implementation Plan for Phase II
- City Council approval of the amended Santa Monica Community Access Plan for Phase II
- City Council approval of the Phase II Master Plan
- Planning Commission approval of DRPs for each of the ten Project buildings, subject to City Council approval on appeal
- City approval of the tentative and final subdivision map(s) for the Providence Saint John's Campus
- City approval of a street vacation application for the northern portion of 21st Street
- Approval of Architectural Review permits and other appropriate permits granted by local agencies, boards and commissions
- Approval of removal of street trees as necessary by Urban Forester
- Building permits, demolition permits and related permits
- Utilities easements as necessary
- Office of Statewide Health Planning and Development (OSHPD) approvals of certain Project buildings (i.e., West Ambulatory Care & Research Building, East Ambulatory Care &

Research Building, West Ambulatory & Acute Care Building, and East Ambulatory & Acute Care Building)

- Ongoing OSHPD compliance review during construction of certain Project buildings.
- Any other incidental discretionary or administrative approvals needed for the construction and operation of the Project.

4.11.4.4 Project Impacts

***Impact LU-1**: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Impact Statement LU-1: The Project, with the approval of amendments to the HASP, amendments to the Development Agreement, Phase II Master Plan, Phase II Development Program, and associated entitlements, would be substantially consistent with adopted land use plans, policies, guidance, and regulations adopted for the purpose of avoiding or mitigating an environmental effect and, therefore, would not result in a significant environmental impact as a result of any plan inconsistencies. Therefore, impacts with respect to land use and planning would be less than significant.

LUCE`

Consistency with the Healthcare Mixed Use District Land Use Designation

The Project Site is located within the Healthcare Mixed Use District. The Healthcare District allows for a variety of uses to support PSJHC, including hospital, medical office, medical research, pharmacies, residential care, rehabilitation and outpatient clinics, affordable workforce and market-rate housing targeted at hospital employees, extended stay lodging for patient families, and supporting retail uses. As listed on Table 2-3, the Project includes Hospital/Healthcare, Medical Research, Education and Conference Center, Health and Wellness Center, Medical Office, Health-Related Services, Neighborhood Commercial, Restaurant, Visitor Housing, and Multifamily Housing uses that are consistent with the Healthcare District land use designation. The LUCE defers development standards to the HASP and calls for an amendment to the HASP to address the evolving needs of the healthcare community, create affordable and workforce housing, protect residential properties in the Healthcare District, and provide pedestrian paths, open space, and plazas. The Project would amend the HASP to provide a variety of health-related services, provide multi-family housing (including two units of affordable housing) and visitor housing, and include setbacks, stepbacks, and landscaping to protect adjacent residential properties. Furthermore, the Project would incorporate pedestrian paths, open space, and plazas, specifically within Saint John's Square (Site S4), Mullin Plaza (Site 2 D/E), Woodland Garden (Site S4), Sun Garden (Site S5), and South Garden (Site S5). An amendment to the HASP is proposed to incorporated the provisions of the Project and other updates regarding the PSJHC.

Consistency with LUCE Goals and Policies

The LUCE includes a number of goals and policies that provide guidance for future development, including health care. Consistency with goals and policies that are particularly relevant to the land use relationship between the Project and surrounding uses is evaluated in **Table 4.11-3**,

Comparison of the Project to Applicable Goals and Policies of the LUCE. As indicated, the Project would be consistent with relevant LUCE goals and policies related to preserving and enhancing existing neighborhoods; encouraging walking, bicycling, and public transit; providing affordable housing; increasing open space and enhancing the pedestrian access; supporting the responsible expansion of the PSJHC; and updating the HASP. The Project would be consistent with adopted City plans, policies, and programs supporting alternative transportation and would result in per capita VMT that is lower than existing Citywide per Capita VMT rate in accordance with CEQA Guidelines Section 15064, Subdivision (b) (refer to Section 4.17, *Transportation*, of this EIR). As further evaluated in., the Project would minimize traffic impacts through design features and mitigation measures to try to reduce effects the extent feasible on the neighborhood quality of life.

TABLE 4.11-3
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE LUCE

LUCE Goals and Polices	Analysis of Project Consistency
Conserving and Enhancing Neighborhoods	
Policy LU1.3: Preserve neighborhood quality of life and protect neighborhoods against potential impacts related to development, traffic, noise, air quality and encroachment of commercial activities and establish standards that transition down the building envelope of commercial buildings adjacent to residential properties.	**Partially Consistent.** The Project would preserve the neighborhood quality of life by developing healthcare, medical, hospital, and related uses within the Healthcare District. The Phase II Master Plan would establish minimum setbacks and stepbacks for all buildings to ensure compatibility with adjacent properties. Furthermore, proposed Phase II Master Plan uses would be located on either side of Santa Monica Boulevard consistent with adjacent medical offices and the PSJHC core facilities. As analyzed in Sections 4.17, *Transportation and Traffic*; 4.13, Noise and Vibration; and 4.2, *Air Quality*, Project design characteristics and features, along with mitigation measures, as applicable, would minimize traffic, noise, and air quality impacts of the Project. However, air quality impacts (e.g., construction TACs and regional criteria NOx emissions) and traffic impacts (e.g., operational intersection and street segment operations) would be significant and unavoidable.
Linking Land Use and Transportation Policy: Addressing Climate Change	
Goal LU2: Integrate Land Use and Transportation for GHG Emission Reduction - Integrate land use and transportation, carefully focusing new development on transit-rich boulevards and in the districts, to create sustainable active pedestrian-friendly centers that decrease reliance on the automobile, increase walking, bicycling and transit use, and improve community quality of life. **Policy LU2.4:** Create diverse housing options along the transit corridors and in the activity centers, replacing some commercial potential with additional affordable and workforce housing, and encouraging affordable workforce housing near the transit stations.	**Consistent. (Goal LU2, Policies LU2.3 through LU2.6)** The Project would integrate land use and transportation and reduce vehicle trips by providing new healthcare uses near two Expo Light Rail stations, near bus lines along Santa Monica Boulevard and 20th Street, and new bicycle connections to the dedicated bicycle lane on Broadway. Furthermore, the Project would include pedestrian connections such as widened sidewalks along Santa Monica Boulevard and Broadway and new open space areas (i.e., South Garden, Sun Garden, Woodland Garden, Saint John's Square, and Mullin Plaza) and a Wellness Walk to encourage pedestrian activity. In addition to the open space areas, the Mullin Plaza Café, Saint John's Café, and ground floor Health-Related Services, Restaurant, or Neighborhood Commercial Uses would create activity pedestrian spaces for meeting or shopping. The Project would provide 10 units of replacement Multifamily Housing (including 2 units of affordable housing) and up to 34 units of visitor housing, consistent with the existing DA. The housing would be located near transit stations and would primarily serve PSJHC.
Policy LU2.5: Achieve vehicle trip reduction through comprehensive strategies that designate land uses, establish development and street design standards, implement sidewalk, bicycle and roadway improvements, expand transit service, manage parking, and strengthen	As part of the Phase II Master Plan, a comprehensive, shared parking program and TDM program (for both Phase I and Phase II) would continue to be implemented to manage parking and reduce vehicle trips. The TDM measures that would be implemented under Phase II are discussed in PDF-TR-2, in Section 4.17, *Transportation*.

LUCE Goals and Polices	Analysis of Project Consistency
Transportation Demand Management programs that support accessibility by transit, bicycle and foot, and discourage vehicle trips at a district-wide level. Monitor progress using tools that integrate land use and transportation factors. Increase bicycle and pedestrian connectivity in transit districts and adjacent bus and shuttle services to ensure success of the transit system. **Policy LU2.6:** Focus new development in defined districts to create active spaces that can support diverse local-serving retail and services, walkability, arts and culture. Require, whenever possible, new development to provide convenient and direct pedestrian and bicycle connections.	
Goal LU7: Support the continued vitality of the City's hospitals to meet the healthcare needs of the City and the larger region, and implement strategies to reduce vehicle trips. **Policy LU7.1:** Encourage workforce housing near the hospitals, primarily to serve healthcare employees. **Policy LU7.2:** Work with the hospitals to create a TDM District and programs to comprehensively address parking and trip reduction goals, and to develop convenient connections between the hospitals and Memorial Park Light Rail Station. **Policy LU7.3:** Encourage a variety of services and uses in the district, and in commercial districts throughout the City, to support the changing needs of the healthcare community and hospitals. **Policy LU7.4:** Allow responsible expansion of the hospitals and medical uses that is sensitive to the surrounding residential neighborhoods and coordinated with a comprehensive TDM and trip reduction strategies.	**Consistent. (Goal LU7, Policies LU7.3 through LU7.4)** The Project would ensure the continued vitality of the PSJHC through the implementation of amendments to the HASP, DA, and preparation of a Phase II Master Plan that would allow up to 682,700 square feet of new floor area. The new floor area would include Hospital/Health Care and other related medical uses, ground floor Restaurant or Neighborhood Commercial or Health Related Services, 10 units of replacement Multifamily Housing (including 2 affordable units), and up to 34 units of visitor housing. The Project buildings and related improvements would be reviewed pursuant to the City's DRP process for consistency with the Phase II Master Plan and amended DA. Although the Project is primarily for Hospital/Health Care and related medical uses, the replacement Multifamily Housing (including 2 units of affordable housing) and visitor housing is consistent with the existing DA. The Project Site is located in close proximity to the 17th Street/Santa Monica College Station and the 26th Street/Bergamot Station. Furthermore, as described in Section 4.17, *Transportation*, under PDF-TR-2, a TDM program and a comprehensive shared parking program (for both Phase I and Phase II) would be implemented, which would address trip reduction goals. The Project would be sensitive to surrounding residential neighborhoods by including landscaped setbacks, building stepbacks, and new open space areas (i.e., South Garden, Sun Garden, Woodland Garden, Saint Johns' Square, and Mullin Plaza). Furthermore, the conversion of a portion of 21st Street to a "living street" would create a vibrant pedestrian environment and protect residents on 21st Street from cut-through vehicular traffic.
Improving the Quality of Life	
Policy LU10.3: Focus on additional affordable and workforce housing with an emphasis on employment centers in proximity to transit facilities. **Policy LU11.4:** Encourage programs for employer-assisted housing (housing accessible to Santa Monica workers) and other efforts to reduce vehicle miles traveled.	**Consistent. (Policies LU10.3 and LU11.4)** The Project would be located in proximity to transit centers, including two Expo Light Rail stations and bus lines along Santa Monica Boulevard and 20th Street. The Project would implement an enhanced TDM program that would cover the entire PSJHC. These efforts would reduce vehicle miles traveled. Although the Project is primarily for Hospital/Health Care and related medical uses, the Project would provide 10 units of replacement Multifamily Housing (including 2 units of affordable housing) and up to 34 units of visitor housing, consistent with the existing DA.

LUCE Goals and Polices	Analysis of Project Consistency
Mid-City Neighborhood	
Goal N23: Protect, preserve, and enhance the Mid-City residential neighborhood and ensure compatible design**.** **Policy N23.2:** Provide additional protections for areas within Mid-City that are adjacent to the proposed Healthcare District and the Mixed-Use Creative District. Such protections could include: • Protections for the neighborhood in the development of the Healthcare Specific Plan and the Area Plan for the Mixed-Use Creative District Area Plan • Working with the Santa Monica-UCLA Medical Center and Saint John's Health Center on the development of a comprehensive circulation and parking strategy for the districts, employing aggressive Transportation Demand Management programs to mitigate potential impacts on adjacent residential neighborhoods and provide enhanced parking enforcement in the neighborhoods • Designating adjacent residential areas as Neighborhood Conservation Overlay Districts • Requiring clear edges and additional landscaping between the districts and the neighborhoods • Increasing connectivity between the districts and the neighborhoods through enhanced pedestrian and bicycle facilities • Ensuring that streets and sidewalks are recognized as important green open space with improved quality and enhanced connectivity	**Consistent. (Goal N23, Policy N23.2)** The Project Site is located within the Healthcare District. The Project would include amendments to the HASP to reflect the amended DA and Phase II Master Plan for the PSJHC Campus. The Project would include protections for the adjacent neighborhoods through landscaped setbacks, building stepbacks, and green open space areas (i.e., South Garden, Sun Garden, Woodland Garden, Saint John's Square, and Mullin Plaza). The Project would also increase connectivity between the PSJHC Campus and the neighborhoods through pedestrian improvements along Santa Monica Boulevard and Broadway (such as widened sidewalks), improvements to the pedestrian network within the PSJHC Campus, and new bicycle connections to the dedicated bicycle lanes on Broadway. In addition, the northern portion of 21st Street would be converted to a "living street" that would create a vibrant pedestrian environment. As described in Section 4.17, *Transportation*, under PDF-TR-2, the Project would provide a TDM program and also provide a comprehensive, shared parking program for the entire PSJHC Campus, which would reduce traffic and parking impacts on adjacent residential neighborhoods.
Historic Preservation	
Policy HP1.3: Ensure that new development, alterations or remodeling on, or adjacent to, historic properties are sensitive to historic resources and are compatible with the surrounding historic context.	**Partially Consistent.** As described in Section 4.4, *Historical Resources*, the Project would result in the demolition of the Child & Family Development Center (Site 2I) and John Wayne Cancer Institute (Site S4), both of which are considered historic resources due to their associations with the development of medical facilities and the medical community. However, the Project would replace these buildings with new medical buildings associated with the PSJHC, which would be consistent with the existing and historical medical uses in the area and the LUCE's overall goal D28 to improve the PSJHC.
Policy HP1.10: Review proposed developments for potential impacts on unique archaeological resources, paleontological resources, and incorporate appropriate mitigation measures to protect or document the resource.	**Consistent.** As described in Section 4.5, *Archaeological Resources*, and Section 4.7, *Geology and Soils*, a technical archaeological and paleontological reports were prepared to evaluate the impact of the Project on such resources. With implementation of the recommended mitigation measures, impacts on archeological and paleontological resources would be less than significant.

LUCE Goals and Polices	Analysis of Project Consistency
Santa Monica Boulevard – Cloverfield to 20th Street	
Goal B4: Create an enhanced multi-modal, mixed-use boulevard that provides residents, employees and visitors with an inviting pedestrian environment. **Policy B4.1:** Ensure that buildings fronting Santa Monica Boulevard have their primary façades facing the boulevard and located on the property line or backside of the sidewalk. However, to support a lively streetscape with places for people to socialize, small landscaped gathering spaces and plazas are encouraged. **Policy B4.7:** Ensure that mixed-use developments have active ground floor uses that face the boulevard with residential as the predominant use located on the upper floors east of 23rd Street. Small floor plate, local-serving medical offices may also be located on the upper floors within the Healthcare Mixed-Use designation. **Policy B4.8:** Offices and other limited pedestrian access uses are discouraged on the ground floor facing the boulevard. Entrances to upper-level uses, such as lobbies, shall be limited in length along the sidewalk. **Policy B4.9:** Encourage affordable and workforce housing in proximity to transit and major employment centers. **Policy B4.10:** Encourage sidewalk dining where it meets established criteria. **Policy B4.12:** Enhance the streetscape environment to create an inviting pedestrian environment. **Policy B4.13:** Improve pedestrian crosswalks along the length of the boulevard.	**Consistent. (Goal B4, Policies B4.1, B4.7, B4.8, B4.9, B4.10, B4.12, and B4.13)** The Project would improve Santa Monica Boulevard in the project area as a mixed-use, multi-modal boulevard. The Project would provide an East and West Ambulatory & Acute Care Building, ground-level Health-Related Services, Restaurant, or Neighborhood Commercial Uses, Mullin Plaza and Café on the north side of Santa Monica Boulevard and the West Ambulatory Care & Research Building, East Ambulatory Care & Research Building/Education & Conference Center, ground-level Health-Related Services, Restaurant, or Neighborhood Commercial, and Saint John's Square and Café on the south side of Santa Monica Boulevard. The Project would include landscaped setbacks, widened sidewalks, Mullin Plaza, Saint John's Square, and internal pedestrian networks to provide residents, employees, and visitors with an inviting pedestrian environment. Outdoor dining could be accommodated as part of the Mullin Plaza Café and Saint John's Café in close proximity to Santa Monica Boulevard. In addition to the widened sidewalks along Santa Monica Boulevard, there would be new/relocated signalized intersections at the west and east sides of Santa Monica Boulevard and South Campus West Driveway, and the west and east sides of Santa Monica Boulevard and South Campus East Driveway. The primary façades of the buildings that are adjacent to Santa Monica Boulevard would be fronting the Mullin Plaza driveways (north of Santa Monica Boulevard) and the primary façades of the buildings adjacent to and south of Santa Monica Boulevard would be oriented towards Saint John's Square. The entrances would be easily accessible to pedestrians from Santa Monica Boulevard. The exact placement and orientation of buildings would be established as part of the Phase II Master Plan and DRP process. The Project would provide 10 units of replacement Multifamily Housing (including 2 units of affordable housing) and up to 34 units of visitor housing, consistent with the existing DA. The housing would be located near transit stations and bus lines.
Goal B5: Transform Santa Monica Boulevard into an attractive, mixed-use boulevard that recognizes the distinct character of its three sub-areas and contributes to the well-being of the healthcare and auto-related segments of the City's economy. **Policy B5.1:** Encourage affordable and workforce housing in conjunction with new mixed-use development. **Policy B5.3:** Ensure that mixed-use areas east of 20th Street contain a mix of local-serving retail or healthcare uses and predominantly upper-level residential to create distinct neighborhood environments with 17 hour per day/7 day per week pedestrian activity. **Policy B5.4:** Design healthcare and related facilities with community benefits planned around open spaces and enhanced pedestrian and transit facilities.	**Consistent. (Goal B5, Policies B5.1, B5.3, and B5.4)** The Project is located within the Cloverfield to 20th Street subarea and would contribute to the well-being of the healthcare economy by providing 682,700 square feet of new floor area that would be developed to provide a range of health care and related services for Santa Monica and surrounding communities. The Project would include ground-level Health-Related Services, Restaurant, or Neighborhood Commercial uses, 10 units of replacement Multifamily Housing (including 2 units of affordable housing) and up to 34 units of Visitor Housing to create a distinct neighborhood environment with 17 hours per day/7 days per week of pedestrian activity. The Project would include an amended Santa Monica Community Access Plan (SMCAP) that provides cash support and healthcare and related services to Santa Monica residents, the Santa Monica Malibu Unified School District, and the general community. The new Saint John's Square and Mullin Plaza open space areas could accommodate special events such as health fairs. The Project would also provide wide sidewalks, landscaping, and improvements to the pedestrian network (including a Wellness Walk) within the PSJHC Campus.

LUCE Goals and Polices	Analysis of Project Consistency
Broadway – Cloverfield to 20th Street	
Goal B6: Create an enhanced mixed-use, pedestrian- and bicycle-oriented boulevard that provides residents, employees and visitors with an inviting landscaped pedestrian environment. **Policy B6.1:** Ensure the buildings fronting Broadway have their primary façades facing the boulevard and located on the property or back side of the sidewalk. However, to encourage a lively streetscape with places for people to socialize, small landscaped gathering spaces and plazas are encouraged. **Policy B6.7:** Ensure that mixed-use developments have active ground floor uses that face Broadway with predominantly residential located on the upper floors. Ground floor residential may be allowed in limited areas if designed in a pedestrian-oriented manner with features such as street facing main entrances, stoops, patios, and fenestration. **Policy B6.8:** General office and other limited pedestrian access uses are discouraged on the ground floor facing Broadway. Entrances to upper-level uses, such as lobbies, shall be limited in length along the sidewalk. **Policy B6.9:** Affordable and workforce housing should be encouraged in proximity to transit and major employment centers. **Policy B6.10:** Encourage sidewalk dining where it meets established criteria. **Policy B6.13:** Improve pedestrian crosswalks along the length of Broadway.	**Consistent. (Goal B6, Policies B6.1, B6.7, B6.8, B6.9, B6.10, and B6.13)** The Project would include 10 units of replacement Multifamily Housing with ground-level Neighborhood Commercial uses fronting Broadway, up to 34 units of visitor housing, the South Garden, landscaped setbacks, widened sidewalks, and bicycle connections that would create an enhanced mixed-use boulevard along Broadway. In addition, the South Garden could include tables to eat outdoors. Although the primary façade of the Visitor Housing would not front Broadway, the South Garden would contribute to a lively streetscape. Pedestrian access to Visitor Housing from Broadway would be provided. No general office uses are proposed along Broadway. In addition to the widened sidewalks along Broadway there would be new crosswalks at the east side of the new intersection at 20th Place and Broadway and on the west side of the new intersection of Southeast Driveway and Broadway. The Project would provide 10 units of replacement Multifamily Housing (including 2 units of affordable housing) and up to 34 units of visitor housing, consistent with the existing DA. The housing would be located near transit stations and bus lines.
Policy B8.1: Design new development along Broadway to complement the streets function as a cycling route through the City.	**Consistent.** The Project would include new bicycle connections to the dedicated bicycle lanes on Broadway from the proposed shared bicycle lanes along South Campus West Driveway/20th Place, South Campus East Driveway/Southeast Driveway, and 21st Street via Saint John's Way.
Healthcare District	
Goal D28: Allow for the continued improvement of the Healthcare District and the ongoing responsible expansion of the Saint John's Health Center (St. John's) and Santa Monica-UCLA Medical Center (SM-UCLA). **Policy D28.1:** Accommodate the continued operation and planned responsible expansion of St. John's and SM-UCLA, and associated medical office uses. **Policy D28.2:** Update *the Hospital Area Specific Plan (HASP)* concurrently with the master planning efforts of both St. John's and SM-UCLA to encourage a holistic view of the growth and diversification of the district. **Policy D28.3:** Consider the projected increase in outpatient services, diagnostic	**Consistent. Goal D28, Policies D28.1, D28.2, D28.3, D28.4)** The Project would accommodate the continued operation and planned responsible expansion of the PSJHC through the Phase II Master Plan, Phase II Development Program, amendments to the DA, and amendments to the HASP that would allow up to 682,700 square feet of new floor area. The Phase II Development Program would include health care and related services such as acute care, outpatient care, medical research, education and conferencing, medical office, up to 34 units of visitor housing, 10 units of replacement Multifamily Housing, and ground floor Restaurant or Neighborhood Commercial or Health Related Services. The Project buildings and related improvements would be reviewed pursuant to the City's DRP process for consistency with the Phase II Master Plan and amended DA.

LUCE Goals and Polices	Analysis of Project Consistency
technology, and supportive care such as physical therapy and ancillary services in the amended *HASP*. **Policy D28.4:** Extend the boundaries of the *HASP* to encompass both St. John's and SM-UCLA, and their associated uses, to include the south side of Wilshire Boulevard between 14th Street and 26th Street, and extending to the south side of Broadway.	
Policy D28.5: Encourage supportive retail development at key intersections and along major boulevards in the Healthcare District.	**Consistent.** As previously described, the Project would include supportive retail development (i.e., ground floor Neighborhood Commercial, Restaurant, or Health Related Services) along Santa Monica Boulevard and Broadway.
Policy D28.6: Provide flexibility when updating the *HASP* in order to meet the community's strategic healthcare needs and support the sustainability of both hospitals while protecting the residential neighborhoods.	**Consistent.** The Phase II Master Plan and the DA allow some flexibility for establishing the eventual location and not-to-exceed amount of certain vested uses within the Phase II Buildings. The provisions of the Phase II Master Plan and amended DA would also be incorporated in the amended HASP. The Project includes protections for the adjacent residential neighborhoods through landscaped setbacks; building stepbacks; landscaped open space areas and plazas (i.e., Mullin Plaza, Saint John's Square, South Garden, Sun Garden, and Woodland Garden); a TDM program; and a comprehensive, shared parking program.
Policy D28.7: Encourage hotels and long-term housing that supports the hospitals in appropriate locations.	**Consistent.** The Project would also provide up to 34 units of long-term housing (i.e., Visitor Housing) for inpatients and outpatients of the facilities located on the PSJHC Campus, visiting health care professionals, and participants in health care conferences and seminars located on the PSJHC Campus.
Policy D28.8: Encourage the development of a comfortable, landscaped pedestrian environment including plazas and usable landscaped open space with all major renovations to hospital facilities.	**Consistent.** As previously described, the Project would include widened sidewalks, landscaped setbacks, Mullin Plaza, Saint John's Plaza, the South Garden, the Sun Garden, the Woodland Garden and improvements to the pedestrian network within the PSJHC Campus to provide a comfortable pedestrian environment.
Policy D28.9: Provide appropriate transitions and buffers between new hospital facilities and the existing residential neighborhoods.	**Consistent.** As previously stated, the Project would provide landscaped setbacks, building stepbacks, and open space areas (i.e., the South Garden, Sun Garden, and Woodland Garden) to provide appropriate transitions with adjacent residential neighborhoods.
Policy D28.10: Housing currently owned by the hospital may be displaced provided that replacement housing is provided. **Policy D28.11:** Encourage affordable and workforce housing within the district to support the hospital employees.	**Consistent.** The Project would include 10 units of Multifamily Housing on Site S2 to replace an existing vacant 10-unit multifamily apartment building, owned by Providence Saint John's on Site S4. The 10 units of replacement Multifamily Housing would include 2 affordable housing units.
Policy D29.5: Encourage the development of an enhanced pedestrian realm with improved sidewalks, landscaping and pedestrian amenities.	**Consistent.** As previously described, the Project would enhance the pedestrian realm by providing widened sidewalks, landscaped setbacks, Mullin Plaza, Saint John's Plaza, the South Garden, the Sun Garden, the Woodland Garden, and improvements to the pedestrian network within the PSJHC Campus.
Policy D30.7: Encourage mixed-use developments to have active ground floor uses that face the street with residential or medical office development located on the upper floors. Limit the length of entrances and lobbies to upper-level uses along the length of the sidewalk.	**Consistent. (Policies D30.7 and D30.8)** The Project would include ground floor neighborhood commercial, restaurant, or health-related services uses that are readily accessible from Santa Monica Boulevard, Broadway, or 20th Street. The 20th Street Medical Building would be accessed from 20th Street and would include ground floor neighborhood commercial, restaurant or health related service, and a lobby for the medical office uses on the second and third floors. The ground level of this

LUCE Goals and Polices	Analysis of Project Consistency
Policy D30.8: Discourage offices and other limited pedestrian access uses on the ground floor facing the street or pedestrian ways.	building would have the smallest floor plate of the three levels. Therefore, the length of the lobby along the sidewalk of 20th Street would be limited.
Policy D30.9: Encourage sidewalk dining where it meets established criteria.	**Consistent.** As previously stated, outdoor dining could be accommodated as part of the proposed Mullin Plaza Café and Saint John's Café.
Diversified and Sustainable Economy	
Goal E10: Support the responsible expansion of the City's existing hospitals and their ancillary support facilities that are requisite to their missions of serving the community. **Policy E10.1:** Support the responsible expansion of Saint John's Health Center and Santa Monica-UCLA Medical Center in the Healthcare District. **Policy E10.3:** Encourage development of a continuum of healthcare uses such as congregate care, senior housing with services, outpatient clinics and other uses consistent with modern medical facilities. **Policy E10.4:** Encourage uses that support the continued operation and vitality of the hospitals, such as private medical offices, extended-stay hotels, cafes, restaurants, and workforce housing at locations that are proximate to the two hospitals.	**Consistent. (Goal E10, Policies E10.1, E10.3, and E10.4)** The Project would support the responsible expansion of the PSJHC through the Phase II Master Plan, Phase II Development Program, amendments to the DA, amendments to the HASP, and a DRP process that would allow up to 682,700 square feet of new floor area. The Phase II Development Program would include a continuum of healthcare uses such as a child and family development center, outpatient care, acute care, medical research, and education and conferencing, that would provide modern, state-of-the-art facilities. The Phase II Development Program would also support the continued operation and vitality of the PSJHC such as a medical office building; up to 34 units of visitor housing for patients, their family, visiting health care professionals, and participants in conferences and seminars; 10 units of replacement Multifamily Housing (including 2 units of affordable housing); and ground floor café, restaurant, and retail uses.
Community Enrichment	
Policy CE6.1: Foster relationships with the healthcare community and community at large to promote the well-being of all residents and make community health a priority. **Policy CE6.2:** Encourage uses and programs that expand residents' access to healthy living services that offer a diverse array of preventative card and medical services to all residents while specifically addressing underserved populations.	**Consistent. (Policies CE6.1 and CE6.2)** The Project would include an amended Santa Monica Community Access Plan to ensure that a reasonable number of Santa Monica residents who are unable to afford fees and memberships will have access to Phase II's community-oriented facilities, including but not limited to, the Education & Conference Center, the Health & Wellness Center, and the Visitor Housing Building. Furthermore, Saint John's Square and Mullin Plaza open space areas could accommodate special community events such as health fairs, and the Education and Conference Center could accommodate community lectures and provide space for community meetings.
Policy CE6.4: Update the HASP (Hospital Area Specific Plan) to encourage creation of a complete neighborhood, providing an example of active living through pedestrian linkages, green streets and pocket parks that allow users to walk comfortably and pleasantly between services, incorporating uses that meet the daily needs of healthcare staff and workforce housing.	**Consistent.** The Project would include an update to the HASP for the PSJHC to ensure consistency with the Phase II Master Plan and amended DA. The Project includes pedestrian linkages from Broadway and Santa Monica Boulevard to the North and South Campuses and enhanced internal pedestrian networks (including a Wellness Walk); widened sidewalks along Santa Monica Boulevard and Broadway; the conversion of the northern portion of 21st Street to a green street; and pocket parks and open space (i.e., South Garden, Sun Garden, Woodland Garden, Saint John's Square, and Mullin Plaza). These features would create a comfortable and pleasant pedestrian environment.

SOURCE: ESA, 2019.

The Project would not be wholly consistent with Policy HP1.3 to "ensure that new development, alterations or remodeling on, historic properties are sensitive to historic resources and are compatible with the surrounding historic context." The Project would result in the demolition of the Child & Family Development Center and John Wayne Cancer Institute, both of which are considered historic resources, primarily for their thematic association with the PSJHC campus. However, development of the Project would allow for the continued improvement of the Healthcare District and the sustainable expansion of the PSJHC consistent with the LUCE and the historic uses of the Sites. Therefore, the Project would be substantially consistent with the objectives of LUCE to mitigate an environmental effect and would not cause significant impacts as a result of any conflict with LUCE policies. Land use and planning impacts with respect to LUCE would be less than significant.

Additional LUCE goals and polices that are more focused on specific environmental topics are discussed in other sections of this EIR. Issues pertaining to: urban form and design are addressed in Section 4.1, *Aesthetics*; sustainability are addressed in Section 4.8, *Greenhouse Gas Emissions*; residential neighborhoods are addressed in Section 4.12, *Neighborhood Effects*; housing are addressed in Section 4.14, *Population and Housing*; and, as discussed above, traffic impacts are addressed in Section 4.17, *of this EIR*.

Hospital Area Specific Plan

The HASP establishes two overlays, SJ-N and SJ-S to govern the development of the PSJHC. The HASP defers to the DA and Master Plan with respect to development standards and use regulations for the PSJHC Campus. Amendments to the HASP are proposed to reflect the Project, Phase II Master Plan, and DA. These amendments would include related maps, background information, development standards, objectives, and implementation program.

Consistency with the applicable land use objectives of the existing HASP is provided in **Table 4.11-4**, *Comparison of the Project to Applicable Land Use Objectives of the HASP*. As indicated, the Project would be consistent with relevant HASP land use objectives. Furthermore, these HASP objectives would be amended, as needed, in order to ensure consistency with the LUCE and other General Plan elements. The objectives would be implemented by the Phase II Master Plan and amended Development Agreement. Therefore, the Project would comply with the objectives of HASP and would not cause significant impacts as a result of any conflict with HASP policies. Land use and planning impacts with respect to the HASP would be less than significant.

Development Agreement

The DA requires preparation and approval of a Phase II Master Plan prior to the approval of DRPs for any of the Phase II Project buildings. The Project is consistent with certain provisions of the DA but would also require amendments to the current DA as described below.

TABLE 4.11-4
COMPARISON OF THE PROJECT TO APPLICABLE LAND USE OBJECTIVES OF THE HASP

Objective	Analysis of Project Consistency
Objective Number 1: Ensure that development in the hospital area balances the need for medical facilities and uses while protecting residential uses in the area.	**Consistent.** The Project would provide a range of health care, in modern, state-of-the-art facilities for Santa Monica and the surrounding communities while also protecting residential uses in the area through landscaped setbacks; building stepbacks; landscaped open space areas and plazas (i.e., Mullin Plaza, Saint John's Square, South Garden, Sun Garden, and Woodland Garden); a TDM program; and a comprehensive, shared parking program.
Objective Number 2: Preserve the residential character of the neighborhoods surrounding the hospitals.	**Consistent.** The Project would preserve the residential character of the surrounding neighborhood through the provision of landscaped setbacks, building stepbacks, wide sidewalks, landscaped open space areas and plazas, and locating visitor and multifamily housing near existing residential uses.
Objective Number 6: Support Land Use Element (LUE) policies for residential districts, Wilshire Boulevard, and Santa Monica Boulevard. The HASP does not propose any changes to LUE policies for these areas.	**Consistent.** As described in Table 4.11-3, the Project would support LUCE policies for residential areas within the Mid-City Neighborhood, along Santa Monica Boulevard and Broadway, and within the Healthcare District. The amended HASP does not propose any changes to LUCE policies for these areas, except for policies that recommend an update to the HASP, which would be implemented as part of the Project for the PSJHC.
Objective Number 7: Encourage the use of architectural materials and design which will be compatible with surrounding uses in the hospital area.	**Consistent.** The Project buildings would be designed to be compatible with the various uses along Santa Monica Boulevard, Broadway, and 20th Street. Each of the proposed buildings would be designed at the time the corresponding DRP application is filed and would be reviewed by the Planning Commission and/or Architectural Review Board.
Objective Number 8: In conjunction with its review of development projects, the City should consider the influence of lighting on adjoining properties.	**Consistent.** Outdoor lighting would be appropriately designed with respect to location, neighboring uses, purpose, activity, and activity level. As part of the City's DRP process outdoor lighting would be reviewed for compliance with Section 9.21.080 of the SMMC to ensure that lighting fixtures would be shielded so as not to produce obtrusive glare onto adjoining properties.
Objective Number 9: New structures should provide covenants requiring that they be maintained in good conditions with attention to their appearance.	**Consistent.** Provisions of the DA, Phase II Master Plan, and DRP process would ensure that new structures constructed as part of the Phase II Master Plan would be maintained in good condition.
Objective Number 10: Consideration should be given to development incentives/regulatory provisions to protect the potentially-architecturally significant building at 2125 Arizona Avenue.	**Consistent.** As evaluated in Section 4.4, *Historical Resources*, development proposed under the Project would not result in an indirect impact on the 2125 Arizona Avenue building (located off-site) and the building would retain its eligibility as a historical resource.
Objective Number 12: SJ Overlays covering the Saint John's property are to be established within the CP District in order to best implement the Saint John's Master Plan. All parcels located between 20th Street on the west, Arizona Avenue on the north, 23rd Street on the east, and Santa Monica Boulevard on the south, will be included in the SJ-N Overlay. All parcels bearing CP zoning and located between 20th Street on the west, Santa Monica Boulevard on the north, 23rd Street on the east and Broadway on the south, will be included in the SJ-S Overlay.	**Consistent.** The SJ Overlays for SJ-N and SJ-S, within the HASP boundaries are shown on Figure 4.11-2 and Map 13 of the HASP. As also indicated on Figure 4.11-2, the underlying zoning is HMU District and, for a small portion, MUBL District. The SJ-N Overlay does include the boundaries indicated in this objective. However, the SJ-S Overlay does not include all parcels between 20th Street, Santa Monica Boulevard, 23rd Street, and Broadway. Although no change to the boundaries of the SJ-S Overlay is proposed, the SJ-N and SJ-S Overlays would be designated as one HASP Overlay for PSJHC as part of the amendment to the HASP.

SOURCE: ESA, 2019.

The DA establishes vested rights for up to 799,000 square feet of development for the North and South Campus sites, of which no more than 744,000 square feet of floor area shall be above grade. For the North Campus, the DA establishes Height, Vested Floor Area, and minimum building setbacks for Sites 2C, 2D/E, and 2I, as summarized in Table 4.11-1. Furthermore, Vested Floor Area may be shifted between these three Sites provided that the aggregated floor area of 402,500 square feet remains unchanged. For the PSJHC Campus, the DA establishes an overall Vested Floor Area of 396,500 square feet.

As shown in Table 4.11-2, the overall floor area for the Project Site would total 682,700 square feet, of this total 660,150 square feet would be above grade. Therefore, the Project would not exceed the maximum total of 799,000 square feet and above-grade floor area limits of 744,000 square feet.

As also indicated in Table 4.11-2, the floor area for the North Campus (Sites 2C, 2D/E – including Mullen Plaza, and 2I) would equal 286,500 square feet, which would be less than the maximum floor area of 402,500 square feet referenced above. Furthermore, the maximum building floor area for Sites 2C, 2D/E listed in Table 4.11-2 would be less than vested floor area listed in Table 4.11-1, with the exception of Site 2C, which would exceed the maximum building floor area by 3,500 square feet. However, the DA allows floor area to be shifted between the three Sites. The development proposed for Sites 2D/E and 2I are well below the maximum building floor area. In addition, the height of the North Campus sites listed in Table 4.11-2 would not exceed the maximum building heights listed in Table 4.11-1. As shown on Figure 2-4, the North Campus sites would meet the minimum building setback requirements presented in Table 4.11-1. Therefore, development proposed for the North Campus sites would be consistent with the floor areas, heights, and setbacks specified in the DA.

As shown in Table 4.11-2, for the South Campus sites, the total floor area would equal 396,200 square feet, which would be less than the maximum floor area of 396,500 square feet referenced above and therefore consistent with the DA. As stated in the DA, building heights and setbacks would be established in the Phase II Master Plan, discussed below. Currently under the HMU District, the maximum building height is 3 stories/47 feet and a minimum setback of 5 feet is required adjacent to residential areas. As listed in Table 4.11-2 maximum building heights would range from 36 feet to 105 feet. As shown on Figure 2-4, buildings S2, S5, S3 and S4 would be setback a minimum of 15 feet from the curb along Broadway and Santa Monica Boulevard; Buildings S3 and S1 would be setback a minimum of 30 feet from the western property line; and Buildings S5 and S2 would be setback 10 feet and 20 feet, respectively from adjacent residential uses.

The uses proposed for the Project Site as summarized on Table 2-3 would be consistent with the Vested uses listed in Table 2-2 and defined in the DA (DA Section 3.7.2(a)-(b)). As part of the Phase II project, several DA amendments are proposed. Notably, the amendments would allow an extension of Phase II vested rights pursuant to a comprehensive Phasing Plan that provides review of individual Phase II Project buildings at specified milestones. Other DA amendments are proposed as part of the Phase II project, including but not limited to an additional 50,000 square feet of floor area for Hospital/Health Care uses (404,000 square feet instead of 354,000 square feet) with no increase in the overall floor area for Phase II, changes to and expansion of the Mullin Plaza

open space, and the potential addition of a small retail/café structure within this open space. The Project must comply with the requirements of the amended DA and would not cause significant impacts as a result of non-compliance. Therefore, land use and planning impacts associated with the amended DA would be less than significant.

Zoning Ordinance

As previously described the Project Site is located within the HMU District with a small portion of Site S5 located in the MUBL District. Uses proposed within the Project Site are consistent with the permitted uses within the HMU District. Although the HMU District includes height limit, setback, stepback, and Community Benefit requirements, the Phase II Master Plan and proposed DA amendments would override the Zoning Ordinance during the terms of the DA until 2053. As previously described, the Phase II Master Plan and amended DA would incorporate building height limits, setbacks, stepbacks, and Community Benefits.

Within the portion of the Project Site zoned MUBL, the South Garden open space area is proposed. Although this use would provide landscaping and pedestrian enhancements along Broadway, consistent with the permitted uses within the MUBL. The Project must comply with the requirements of the Zoning Ordinance and specific requirements of the DA amendments. Therefore, it would not cause significant impacts as a result of non-compliance. Land use and planning impacts associated with the Zoning Ordinance would be less than significant.

SCAG RTP/SCS

SCAG's RTP/SCS incorporates goals that are applicable to the pattern of development in the region. **Table 4.11-5**, *Consistency of the Project with Goals of the RTP/SCS*, provides an analysis of the Projects consistency with applicable RTP/SCS goals.

As indicated in the analysis presented in Table 4.11-5, the Project would be consistent with RTP/SCS goals and therefore impacts would be less than significant. Key points that support this conclusion include the following:

- The Project would provide for the expansion of its healthcare and related facilities within the Healthcare District, near two Expo Light Rail stations, near bus lines along Santa Monica Boulevard and 20th Street, and would implement a TDM program to reduce single-occupancy vehicle trips.
- The Project would provide new bicycle connections to the dedicated bicycle lane on Broadway, bicycle parking, pedestrian pathways, and widened sidewalks on Santa Monica Boulevard and Broadway to encourage active transportation. Both long-term and short-term bicycle parking, including showers and clothing lockers, would be provided throughout both the North and South Campuses.

TABLE 4.11-5
CONSISTENCY OF THE PROJECT WITH GOALS OF THE RTP/SCS

Goal	Analysis of Project Consistency
Align the plan investments and policies with improving regional economic development and competitiveness.	**Consistent.** This goal pertains to SCAG funding and policies. The Project would not adversely affect the capacity to align plan investments and policies with economic development and competitiveness. As the Project does provide regional economic benefits in a manner consistent with other RTP/SCS goals (as discussed below) and within a HQTA, the Project would support SCAG choices regarding this goal.
Maximize mobility and accessibility for all people and goods in the region.	**Consistent.** The Project would provide for the expansion of its health care and related facilities near two Expo Light Rail stations, near bus lines along Santa Monica Boulevard and 20th Street, and would implement a TDM program to reduce single-occupancy vehicle trips. The Project would also include new bicycle connections to the dedicated bicycle lane on Broadway and would provide new open space areas and pedestrian paths to encourage pedestrian activity. Furthermore, the Project would provide vehicular access to and from the Campus and underground parking primarily through internal driveways rather than directly from Santa Monica Boulevard or Broadway.
Ensure travel safety and reliability for all people and goods in the region.	**Consistent.** The Project would provide enhanced vehicular, pedestrian, and bicycle access and circulation to minimize vehicle/pedestrian/bicycle conflicts, as shown on **Figure 2-5**, *Proposed Vehicular and Bicycle Circulation*. Vehicular access to and from the Campus would primarily be from Santa Monica Boulevard via new internal driveways, while bicycle access would primarily be from Broadway via new internal driveways. The Project would include new bike lanes, pedestrian paths, and widened sidewalks to enhance safety for bicyclists and pedestrians. Patients, visitors, and workers would have a range of transportation alternatives available to meet their transit needs.
Preserve and ensure a sustainable regional transportation system.	**Consistent.** The proximity of the Project to a number of mobility options, including two Expo Light Rail stations and bus lines along Santa Monica Boulevard and 20th Street, would support the region's transportation investment and the sustainability of the regional transportation system. Furthermore, the Project Site is located adjacent to a number of bicycle lanes/paths, including the Broadway bike lane. Breeze bike share hubs are also located in close proximity to the Phase II sites.
Maximize the productivity of our transportation system.	**Consistent.** The Project would provide for the expansion of the PSJHC health care and related facilities within the Healthcare District consistent with the City's LUCE. The Project would be located near two Expo Light Rail stations and bus lines along Santa Monica Boulevard and 20th Street, as well as the Broadway bike lanes and therefore would enhance the productivity of the transportation system.
Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	**Consistent.** The Project would incorporate sustainability features to improve air quality, such as optimizing passive strategies to reduce energy use (e.g., building orientation, operable windows, and shading); solar photovoltaic panels; solar water heating; green roofs; low-flow fixtures; energy efficient heating, ventilation, and air conditioning (HVAC) and lighting; electrical vehicle charging stations; and a TDM program to reduce single-occupancy vehicle trips. In addition, the Project would be located near two Expo Light Rail stations and bus lines to encourage the use of public transit. Furthermore, the Project would provide new bicycle connections to the dedicated bicycle lane on Broadway, bicycle parking, showers, and clothes lockers, pedestrian pathways, and widened sidewalks on Santa Monica Boulevard and Broadway to encourage active transportation. The Project would be designed and operated to meet the applicable requirements of the California Green Building Standards Code (CALGreen) and the City of Santa Monica Green Building Code pertaining to waste, such as diversion and recycling; energy demand, including implementation of Energy Efficiency Standards and use of surface materials with a high solar

Goal	Analysis of Project Consistency
	reflectance-index average; and water, including reductions in baseline potable water use. In addition, the Project would utilize low emitting materials per the CalGreen Code and minimize maintenance or testing on generators.
Actively encourage and create incentives for energy efficiency, where possible.	**Consistent.** As noted above and described in Sections 4.8, *Greenhouse Gas Emissions*, the Project would support a land use pattern that provides increased opportunity for use of alternative transportation modes which would contribute to reductions in vehicle miles traveled with resulting benefit to energy efficiency. The Project would at a minimum, comply with the environmental sustainability building requirements included in the California Green Building Code and the City's Green Building Standards. The sustainable design features to reduce energy use include passive strategies; solar photovoltaic panels; solar water heating; green roofs; low-flow fixtures; energy efficient HVAC and lighting; and water-efficient equipment and plumbing infrastructure. The Project would be designed and operated to meet the applicable requirements of the California Green Building Standards Code (CALGreen) and the City of Santa Monica Green Building Code pertaining to waste, such as diversion and recycling; energy demand, including implementation of Energy Efficiency Standards and use of surface materials with a high solar reflectance-index average; and water, including reductions in baseline potable water use. In addition, the Project would utilize low emitting materials per the CalGreen Code and minimize maintenance or testing on generators.
Encourage land use and growth patterns that facilitate transit and active transportation.	**Consistent.** The Project would provide for the expansion of the PSJHC health care and related facilities within the urbanized Healthcare District consistent with the City's LUCE. The Project would be located near two Expo Light Rail stations and bus lines along Santa Monica Boulevard and 20th Street and therefore facilitate transit use. Furthermore, the Project would provide new bicycle connections to the dedicated bicycle lane on Broadway, bicycle parking, showers, and clothes lockers, pedestrian pathways, and widened sidewalks on Santa Monica Boulevard and Broadway to encourage active transportation. In addition, the pedestrian pathways would encourage patients, visitors, and staff to walk instead of drive between specific uses on and off the PSJHC Campus.
Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	**Consistent.** This goal pertains to security provided by regional service agencies. The Project would not adversely affect the ability of the service agencies to perform their duties. By providing for the expansion of its health care and related facilities within the Healthcare District and near two Expo Light Rail stations and bus lines along Santa Monica Boulevard and 20th Street, the Project would support economic growth and increased use of public transportation systems that, in turn, would generate revenue that could be used to support security of the regional transportation system.

SOURCE: ESA 2019.

- The Project would incorporate sustainability features to improve air quality, such as optimizing passive strategies to reduce energy use (e.g., building orientation, operable windows, and shading); solar photovoltaic panels; solar water heating; green roofs; low-flow fixtures; energy efficient heating, ventilation, and air conditioning (HVAC) and lighting; electrical vehicle charging stations; and a TDM program to reduce single-occupancy vehicle trips. The Project would be designed and operated to meet the applicable requirements of the California Green Building Standards Code (CALGreen) and the City of Santa Monica Green Building Code pertaining to waste, such as diversion and recycling; energy demand, including implementation

of Energy Efficiency Standards and use of surface materials with a high solar reflectance-index average; and water, including reductions in baseline potable water use. In addition, the Project would utilize low emitting materials per the CalGreen Code and minimize maintenance or testing on generators.

Therefore, the Project would be substantially consistent with the objectives of the RTP/SCS to mitigate or avoid an environmental effect and would not cause significant impacts as a result of any conflict with RTP/SCS policies. Land use and planning impacts with respect to the RTP/SCS would be less than significant.

4.11.4.5 Cumulative Impacts

Development of the Project, in conjunction with those 112 of the 131 cumulative projects identified in Table 3-1 of Chapter 3 as occurring in the City, would increase the number of new housing units and the amount of mixed-use development in the City. However, such land use changes are subject to the policies and regulations of the City's LUCE and Zoning Ordinance, which guides and focus land use changes in limited areas of the City near transit and along transportation corridors.

The Project in combination with other pending/future projects in the City would be consistent with LUCE and SCAG goals of encouraging new housing and supporting commercial uses near transit, improving the pedestrian environment, and providing uses near the Expo Light Rail Line that connects the City of Santa Monica with the greater Los Angeles region. This integrated land use-transportation approach would maximize opportunities for the use of public transit and decrease the distance between new housing, jobs, and transportation services, and therefore, would minimize increases in City traffic, overall vehicle miles traveled, peak-hour congestion, and the generation of greenhouse gas emissions.

As described above for the Project, the City has incorporated into its Zoning Ordinance, regulations and standards that support the LUCE goals and policies and achieve the City's LUCE vision. Pending and future cumulative projects are required to be consistent with the LUCE, applicable specific plans, and/or zoning regulations and may be required to undergo Development Review and/or Development Agreement processing and other discretionary land use actions. The City actively monitors growth and evaluates development for consistency with its regulations and their potential for physical environmental impacts in accordance with CEQA.

As described in the analysis of Project impacts above, the Project, as well as its requested amendments to the HASP and DA, would not create an adverse physical environmental impact as a result of inconsistency with adopted policies. As described further in Section 4.14, *Population and Housing*, of this EIR, growth within the City is consistent with SCAG projections for future development.

Therefore, the Project, in combination with other pending/future cumulative projects, would not result in substantial inconsistencies with plans adopted to avoid or mitigate environmental impacts that would result in significant cumulative land use impacts.

4.11.5 Mitigation Measures

Project impacts would be less than significant with approval of the amended DA, Phase II Master Plan, and amendments to the HASP. No mitigation measures are required.

4.11.6 Level of Significance After Mitigation

No mitigation measures are required; impacts would be less than significant.

4.12 Neighborhood Effects

4.12.1 Introduction

The purpose of this section is to identify and evaluate potential neighborhood impacts associated with the Project. The issue areas analyzed in this EIR that have the potential for creating impacts on nearby neighborhoods include aesthetics, air quality, land use, noise, and transportation and traffic. While each neighborhood in the City of Santa Monica (City) varies in character, each possesses characteristics that are specific to the type of land uses it contains, its location, and its area history. This variation in the characteristics of each neighborhood contributes to the overall character of the City.

"Neighborhood effects" is not an environmental issue category identified in the California Environmental Quality Act (CEQA) or associated State *CEQA Guidelines*. However, the City of Santa Monica (City) 2015 Land Use and Circulation Element (LUCE) of its General Plan requires the completion of a neighborhood impact statement, with public input. (City of Santa Monica 2015) This requirement details the assessment of neighborhood impacts associated with proposed development on the character and cohesiveness of each neighborhood in the City. This section of the EIR constitutes compliance with this requirement.

The impacts on the neighborhood in which the Project Site is located are summarized here and more fully discussed in the appropriate environmental issue sections of this EIR (i.e., Sections 4.1, *Aesthetics*, 4.2, *Air Quality*, 4.11*, Land Use and Planning*, 4.13, *Noise and Vibration*, and 4.17, *Transportation*).

4.12.2 Environmental Setting

4.12.2.1 Neighborhood

The Project Site and greater PSJHC Campus are located in the City's Mid-City Neighborhood, which is geographically defined by Washington Avenue to the north, Santa Monica Boulevard to the south, Centinela Avenue to the east, and 5th Street to the west. The Mid-City Neighborhood is defined by a mix of uses, including residential, commercial, office and medical uses (including the PSJHC and SM-UCLA hospitals).

Mid-City is intersected by three major boulevards (Broadway, Santa Monica Boulevard and Wilshire Boulevard), and has an array of neighborhood- and regional-serving businesses and amenities within a short walk of most homes. The commercial services not only provide the neighborhood with products and services, but they also offer an assortment of employment opportunities for area residents. The PSJHC and SM-UCLA hospitals are major employers in Mid-City, and draw thousands of workers and patients to their locations every day.

The residential component of the neighborhood is made up of a large number of well-maintained mid-20th century apartments and more recent 21st century contemporary Californian Spanish-Mediterranean and modern design style. A number of single-family homes remain as well - with California bungalows and duplexes sprinkled throughout the area.

4.12.2.2 Project Site

As indicated in Figures 2-1 and 2-2 in Chapter 2, *Project Description*, of this EIR, the Project Site is located within the greater approximately 20.72-acre PSJHC Campus. The Campus is generally bound by Arizona Avenue in the north, Broadway in the south, 22nd and 23rd Streets in the east, and 20th Street in the west, and is bisected by Santa Monica Boulevard that separates the PHSJHC into North and South Campuses.

Much of the North Campus was the site of the PSJHC Phase I Project that included construction of the replacement Saint John's Hospital Building and other medical buildings under a 1998 Development Agreement. Phase II is proposed as the second installment of the improvements planned and vested at the PSJHC Campus under the 1998 DA and subsequent amendments. The two City blocks bordered by Arizona Avenue, Broadway, and 20th and 23rd Streets, which contain the PSJHC Campus, also contain other uses (e.g., medical office buildings, Verizon Building, and residential buildings), some of which are owned by PSJHC.

The Project Site includes Phase II Development Sites totaling approximately 401,700 sf. The Project Site is currently fully developed with urban uses of up to two stories above-grade, including the Child Family Development Center, Providence Saint John's Foundation Building, John Wayne Cancer Institute, two temporary MRI modular buildings, a 10-unit vacant apartment building, Mullin Plaza, several surface parking lots, and infrastructure improvements.

4.12.2.2 Surrounding Land Uses

Land uses surrounding the PSJHC Campus include: single- and multi-family residential and hotel uses to the north, across Arizona Avenue; medical office, creative office, and commercial uses to the south, across Broadway; single- and multi-family residential and commercial uses to the east, across 23rd Street, and multi-family residential, medical office, commercial, and hotel uses to the west, across 20th Street. The Project Site is generally surrounded by PSJHC Phase I Project buildings. The exceptions include: Development Sites S1, S2 and S5 that face the office and commercial uses across Broadway to the south; Site 2D/2E that faces multi-family residential uses across 23rd Street to the east, and Sites S2 and S4 that abut multi-family residential, medical office and parking uses to the east (on the west side of 23rd Street); and Development Site 2I that faces medical office uses across 20th Street to the west. In addition, Development Sites S1, S3, S4 and S5 surrounding two multi-family apartment buildings (one of which is senior housing) located along the east side of 2st Street between Santa Monica Boulevard and Broadway.

Several sensitive land use[1] occur in the Project vicinity. These include: Berkley East Convalescent Hospital, several small apartment buildings and single-family residences across Arizona Avenue to the north; several small apartment buildings and single-family residential uses across 23rd Street to the east; and Santa Monica Villas and several small apartment buildings across 20th Street to the west. Also, as indicated previously, two small apartment buildings (one of which is senior housing) are located north of Broadway on the east side of 21st Street. In addition, two schools are located

[1] Sensitive land uses include residential, school, day care, senior/convalescent facilities, inpatient medical facilities, churches, synagogues, and parks. These uses are considered sensitive because they have associated with them sensitive populations (e.g., residents, school children, medical patients, and the elderly), expectations for quiet, and/or expectations for dark at night.

in the immediate vicinity, including McKinley Elementary School located on Santa Monica Boulevard approximately one block to the east, and Lighthouse Christian Preschool located on 20th Street approximately one block to the south.

The PSJHC Phase I Project buildings range in height up to 12 stories, while the buildings surrounding the PSJHC Campus range in height up to eight stories, with most from between one and four stories. The majority of buildings surrounding the Project Site are older buildings, with the exception of the PSJHC Phase I Project buildings, several medical office buildings and hotels on 20th Street, and the Berkley East Convalescent Center on Arizona Avenue.

4.12.2.3 Healthcare District

The Healthcare District includes PSJHC, Santa Monica-UCLA Medical Center (SM-UCLA), and the area immediately around and between these facilities. The District is generally bound by Wilshire Boulevard to the north, Broadway to the south, 23rd Street to the east, and 14th Street to the west. PSJHC and SM-UCLA are the dominant uses in the Healthcare District. Other related medical uses include healthcare-serving commercial uses, assisted care and public parking facilities. A variety of existing residential uses are interspersed within the Healthcare District.

Development in the Healthcare District is governed by the Hospital Area Specific Plan (HASP), that was first approved in 1988 and amended in 1993 and 1998. PSJHC also has an existing 1998 Development Agreement (DA) that regulates development at the Campus. The HASP amendment in 1998 was completed in conjunction with the St. John's reconstruction under the 1998 DA that was needed following the 1994 Northridge earthquake. The current HASP policies integrate development in the area with the needs of the surrounding neighborhood, recognizing the challenges of hospitals in a competitive and changing healthcare environment.

Lack of nearby housing, particularly housing that is affordable to St. John's and SM-UCLA employees, is a major issue that contributes to a critical shortage of staff. Also important are the relationships of the medical facilities to the surrounding residential areas. The lack of convenient walking routes through the district discourages pedestrian circulation, increases the number of vehicles making short trips between related medical uses and disrupts the residential neighborhoods. (City of Santa Monica 2015)

4.12.2.4 Mid-City Neighborhood

Mid-City is geographically defined by Washington Avenue to the north, Santa Monica Boulevard to the south, Centinela Avenue to the east, and 5th Street to the west. The Mid-City neighborhood is composed of mixed uses, including residential, commercial, office and medical uses (including the PSJHC and SM-UCLA hospitals). The residential component is made up of a large number of well-maintained mid-20th century apartments and more recent 21st century contemporary Californian Spanish-Mediterranean and modern design style. A number of single family homes remain as well - there are California bungalows and duplexes sprinkled throughout the area.

Mid-City is intersected by three major boulevards (Broadway, Santa Monica Boulevard and Wilshire Boulevard), and has an array of neighborhood- and regional-serving businesses and amenities within a short walk of most homes. The commercial services not only provide the

neighborhood with products and services, but they also offer an assortment of employment opportunities for area residents. The PSJHC and SM-UCLA hospitals are major employers in Mid-City, and draw thousands of workers and patients to their locations every day.

4.12.3 Regulatory Framework

The following identifies applicable neighborhood effects-related plans, policies and regulations.

4.12.3.1 City of Santa Monica

General Plan - Land Use and Circulation Element (LUCE)

Citywide Goals and Policies

Goal LU1: Protect, conserve and enhance the City's diverse residential neighborhoods to promote and maintain a high quality of life for all residents.

Policy LU1.3: Preserve neighborhood quality of life and protect neighborhoods against potential impacts related to development, traffic, noise, air quality and commercial encroachment.

Policy LU1.5: Require that infill development be compatible with the existing scale, mass and character of the residential neighborhood.

Goal LU4: Create complete neighborhoods that exemplify sustainable living practices with open spaces, green connections, diverse housing, local employment, and local-serving businesses that meet the daily needs of residents and reduce vehicle trips and GHG emissions.

Policy LU4.3: Encourage mixed-use development close to transit to provide housing opportunities for the community, support local businesses, and reduce reliance on automobiles.

Policy LU4.4: Engage pedestrian with ground floor uses, building design, site planning, massing and signage the promote vibrant street life and emphasize transit and bicycle access.

Goal N1: Protect, preserve and enhance the residential neighborhoods.

Policy N1.4: Preserve and protect existing neighborhoods against potential impacts related to development: traffic, noise, air quality and encroachment of commercial.

Policy N1.7: Make new development projects of compatible scale and character with the existing neighborhoods, providing respectful transitions to existing homes, including ground level open spaces and upper-floor step backs.

Healthcare District Goals and Policies

Goal D28: Allow for the continued improvement of the Healthcare District and the ongoing responsible expansion of PSJHC and SM-UCLA.

Policy D28.1: Accommodate the continued operation and planned responsible expansion of PSJHC, SM-UCLA, and associated medical office uses.

Policy D28.6: Meet the community's strategic healthcare needs and support the sustainability of both hospitals while protecting the residential neighborhoods.

Policy D28.8: Encourage the development of a landscaped pedestrian environment including plazas and usable landscaped open spaces with hospital renovations.

Policy D28.9: Provide appropriate transitions and buffers between new hospital facilities and the existing residential neighborhoods.

Policy D29.4: Encourage secure bicycle parking and amenities.

Policy D29.5: Encourage the development of an enhanced pedestrian realm with improved sidewalks, landscaping and pedestrian amenities.

Goal D30: Ensure that new and remodeled buildings are compatible in scale and character with existing buildings and the surrounding residential neighborhood.

Policy D30.1: Encourage the primary facades of buildings to face the street, and encourage a lively streetscape with places for people to socialize, small landscaped gathering spaces and plazas are encouraged.

Policy D30.2: Scale buildings to the pedestrian. Incorporate enhanced materials and detailing in ground floor facades where close proximity to passing pedestrians.

Policy D30.3: Design buildings with a variety of heights, architectural elements and shapes to create visual interest along the street.

Policy D30.5: Establish a prescribed building envelope with step backs designed to maintain access to light and air where adjacent to the existing residential.

Policy D30.6: Encourage active retail and other ground floor uses to incorporate generally continuous, transparent (non-tinted) display windows facing the sidewalk.

Hospital Area Specific Plan

Objective 2: Preserve the residential character of the neighborhoods surrounding the hospitals.

Objective 7: Encourage the use of architectural materials and design which will be compatible with surrounding uses in the hospital area.

Objective 8: In conjunction with its review of development projects, the City should consider the influence of lighting on adjoining properties.

Objective 24: Development in the hospital area shall minimize vehicular intrusion into residential neighborhoods.

Objective 34: Development in the hospital area shall be compatible with abutting uses through (a) physical location and placement of proposed structures on a project site and (b) the location of proposed uses within the District.

Objective 65: Protect residents from noise that would jeopardize their health or welfare.

Objective 66: Direct non-residential traffic to non-residential streets to the extent feasible.

Objective 67: Concentrate noise intensive land uses away from residences when feasible.

Objective 69: Minimize noise generated by new construction. Require all construction activity to comply with the City's construction hour limitations.

PSJHC Development Agreement

As described in Chapter 2, the 1998 PSJHC DA and subsequent amendments provides for two phases of development at the PSJHC Campus. Phase I, that was completed in 2014, involved the demolition and reconstruction of PSJHC core hospital facilities on the PSJHC North Campus. (City of Santa Monica 1998)

Phase II covers Development Sites 2C, 2D/2E, 2I on the North Campus and Development Sites S1 through S5 on the South Campus. Permitted uses include: (1) Child & Family Development Center; (2) day care; (3) Education & Conference Center; (4) Health & Wellness Center; (5) health related services; (6) hospital/health care uses; (7) Internal Phase II Overpasses; (8) medical office; (9) medical research facilities; (10) multi-family rental housing; (11) neighborhood commercial; (12) parking; (13) restaurants; (14) senior housing; (15) underground tunnel; and (16) visitor housing. The overriding purpose of the Phase II Project is to provide an integrated health delivery system that offers a full continuum of care to people who reside or work in Santa Monica and surrounding communities. Such a system would continue to provide traditional health services as well as extended services which focus on outpatient care, prevention, and community health education. (City of Santa Monica 1998)

The DA's provisions established vested rights for Phase II of up to 799,000 sf of development on the PSJHC North and South Campuses. (City of Santa Monica 1998)

PSJHC Phase II Master Plan

As specified in the Second Amendment to the DA, the Phase II Master Plan encompasses all of the Phase II Development Sites. The Phase II Master Plan establishes the basic parameters and vested rights guiding development of the Phase II Project including, without limitation: (1) building placement, (2) building height, (3) building uses, (4) building floor areas, (5) building setbacks, (6) building step-backs, (7) parking (both subterranean and above-grade), (8) location of uses, (9) vehicular and pedestrian circulation, (10) open space and (11) a Phase II Phasing Project Phasing Plan. The Phase II Project Phasing Plan includes phasing and timing for filing DRP applications, obtaining building permits for Phase II Project buildings, constructing Phase II Project buildings, and implementing Phase II improvements such as public open space, infrastructure, and Community and Project benefits.

4.12.4 Environmental Impacts

4.12.4.1 Thresholds of Significance

As indicated previously, neighborhood effects is not an environmental issue category identified in CEQA or the State CEQA Guidelines. However, the City of Santa Monica requires the completion of a neighborhood impact statement as part of the environmental review of projects in or near established residential neighborhoods. In accordance with this requirement, the following is used as the significance threshold by the City in this section:

Would the project:

a) Have considerable effects on the neighborhoods in which it is located?

4.12.4.2 Methodology

The analysis of the Project' neighborhood effects in this section includes: (1) a summary analysis of relevant neighborhood-effects-related physical impacts (e.g., aesthetics, air quality, land use, noise, and traffic) which are analyzed in other sections of the EIR; and (2) a short analysis of Project consistency with applicable neighborhood effects-related goals, policies and objectives in terms of these environmental issues. The analysis in this section is based on the analysis and findings in the following sections of this EIR: 4.1, *Aesthetics*, 4.2, *Air Quality*, 4.11, *Land Use and Planning*, 4.13, *Noise and Vibration*, and 4.17, T*ransportation*. Please refer to these sections for detailed analysis of Project impacts and mitigation measures for each of these environmental issues.

4.12.4.3 Project Characteristics

A summary of relevant Project characteristics is provided below. See Chapter 2 of this EIR for a full description and associated figures including a full description of each proposed building.

Development Program Summary

The Project would demolish the existing medical buildings, the vacant 10-unit apartment building, and surface parking at the Project Site, and develop in their place medical buildings, 30-34 visitor housing units as part of the proposed medical buildings, 10 replacement apartment units, structured parking, and enhanced vehicular and pedestrian circulation connections. As detailed in Chapter 2, the Project would include the demolition of approximately 110,055 sf of existing building floor area and the development approximately 682,000 sf of new building floor area, for a net increase in building floor area of approximately 571,945 sf. Buildings heights would be up to six stories (105 feet).

Functional Zoning

The Project would locate new facilities for inpatient and ambulatory care towards Santa Monica Boulevard in close proximity to PSJHC's core hospital facilities. The new Education and Conference Center, health and wellness uses, and additional medical research uses would be located in the middle of the South Campus, with proposed uses that can be accommodated in buildings with a more residential character (e.g., the new Child & Family Development Center and Child Care Center, Visitor Housing, and Replacement Housing) located along Broadway.

Architecture

The specific design for the individual Project buildings would be based on both the respective Phase II Development Site's context and the important health care and related programs within each of the buildings. The buildings adjacent to Santa Monica Boulevard are envisioned to form a harmonious ensemble with PSJHC's other existing and proposed buildings along Santa Monica Boulevard while enhancing the pedestrian realm. The portion of Broadway adjacent to the Phase II Development Sites would be transformed through the addition of open space areas and buildings with a strong street presence that have distinctly different architectural styles in response to their different (non-medical) context. And, 20th Street would be enhanced with a contemporary building that adds visual interest and activates the street.

Mobility and Enhanced Connectivity

The Project would include pedestrian enhancements to connect the PSJHC Campus to the surrounding neighborhood, including widened sidewalks along Santa Monica Boulevard and Broadway, new crosswalks across these streets, and new pedestrian paths and open space areas. The Project would also include new bicycle connections to the dedicated bicycle lanes on Broadway, and vehicular access to/from the Campus would be provided primarily from private along Santa Monica Boulevard rather than from the adjacent neighborhood streets.

In addition, the proposed buildings would be designed with porous and visually open ground levels and activated ground floor uses to facilitate pedestrian movement and activity. The two existing apartment buildings (one of which is senior housing) located on the east side of 21st Street between Broadway and Santa Monica Boulevard (which are not owned by PSJHC) would have safe and inviting pedestrian connections to and through the South Campus.

Landscaping and Open Space

The Project proposes new open space areas, including 35% open space on the South Campus as required by the DA. These open space areas would enhance the pedestrian experience on and around the Campus, allow opportunities for outdoor exercise and wellness, and provide gathering areas for PSJHC's employees, patients, and visitors as well as area residents and employees. Most of the open space areas would be publicly-accessible.

Community Benefits

The Project would provide the following Community Benefits:

- Child Care Implementation Plan – to expand the existing child care program;
- Amended Santa Monica Community Access Plan – would modify the existing SMCAP to ensure public access to Project community-oriented facilities, such as the Education & Conference Center and Health & Wellness Center;
- Provide lectures for the community and meeting space for community organizations in the Education & Conference Center;
- Implement a Transportation Demand Management (TDM) program for Phase II development that provides incentives for employees to reduce single-occupancy vehicle trips;
- Provide new and enhanced open space areas including Mullin Plaza, Saint Johns' Square, Woodland Garden, Sun Garden, South Garden, and an extensive Wellness throughout the PSJHC Campus;
- Enhanced pedestrian, bicycle, and vehicular access both to and through the Campus; and
- Replacement of 10 existing multi-family housing units to be removed, including the provision of two low-income units.

4.12.4.4 Project Impacts

Impact NHE-1: *Would the project have considerable effects on the neighborhoods in which they are located?*

Impact Statement NHE-1: The Project's aesthetics, air quality, land use and noise impacts would be less than significant or less than significant after mitigation, and thus would result in less than significant neighborhood effects. Furthermore, while the Project could result in significant unavoidable construction vibration impacts to immediately adjacent vibration-sensitive medical uses, any such impacts would not represent neighborhood effects due to the restricted special extent of the impact. However, the Project would include significant unavoidable traffic impacts, including impacts that could have considerable effects on the surrounding Mid-City neighborhood (e.g., significant operations-related intersection and street segment level of service impacts). Therefore, neighborhood effects impacts related to operational traffic would be significant unavoidable.

Aesthetics

The Project would develop new taller buildings at the Project Site that would be visible from some viewpoints in the surrounding Mid-City neighborhood. However, the Project Site is already fully developed with medical, residential and parking uses, is located within a fully urbanized setting, and is blocked from view at some surrounding viewpoints by Phase I development within the Campus. Furthermore, the Project would be subject to City development standards and regulations that are intended to reduce and/or avoid significant aesthetics impacts on adjacent uses. New buildings would also be subject to City design review by the Architectural Review Board. The Project would also include landscaping, additional street trees, sidewalk improvements, setbacks, building step-backs, high quality architecture, use of low-reflective exterior facades, and other features to reduce its aesthetics effects. In addition, as indicated in Section 4.1, *Aesthetics*, of this EIR, the Project would not have a substantial adverse effect on scenic vistas, would not substantially damage scenic resources, would not conflict with applicable zoning and other regulations governing scenic quality, would not create a new source of substantial light or glare, and would not create shading that would interfere with the use of outdoor open space or solar accessibility. Lastly, as indicated in Section 4.1, because the Project meets the criteria set forth in Senate Bill (SB) 743 as a high-employment use on an infill site within close proximity to mass transit, its aesthetic impacts shall not be considered significant impacts on the environment per Section 21099(d)(1) of the Public Resources Code (PRC). For all these reasons, Project impacts related to aesthetics on the surrounding Mid-City neighborhood are less than significant.

Air Quality

The Project would result in construction and operations-related air emissions. As indicated in Section 4.2, *Air Quality*, of this EIR, the Project would result in the following air quality impacts:

<u>Less Than Significant</u>:

- Operational toxic air contaminant (TAC) emissions
- Localized operational emissions

- Carbon Monoxide (CO) hotspots
- Odors

Less Than Significant After Mitigation:

- Regional construction emissions
- Localized construction emissions
- Construction TAC emissions
- Construction and operational consistency with the Air Quality Management Plan (AQMP)
- Regional operational emissions (all criteria pollutants except NOx)

Significant Unavoidable:

- Regional operational emissions (NOx)

As indicated in Section 4.2, the Project would implement project design features (e.g., comply with CALGreen and City Green Building Code standards, implement a TDM program, etc.) and comply with applicable regulations (e.g., comply with SCAQMD Rule 403 dust suppression requirements during construction, etc.) that would reduce Project air emissions. Also, as indicated in the analysis: (1) several of the air quality impacts above are regional rather than localized in nature, and thus would not have the potential to result in significant neighborhood effects on the surrounding Mid-City neighborhood; and (2) the Project would result in less than significant impacts or less than significant impacts after mitigation incorporated for the majority of the air emission types evaluated, and thus would not have the potential to result in significant neighborhood effects associated with these emissions. Furthermore, while Project operation would result in the significant unavoidable emission of one of the criteria pollutants (e.g., NOx) during the Interim year analysis (2031), this would be a regional rather than a local impact that would affect the surrounding Mid-City neighborhood. As discussed in Section 4.2, it was noted that if the SCAQMD regional construction thresholds are applied, the total construction and operational emissions would be below all thresholds. Regardless, Project neighborhood effects impacts related to air quality would be less than significant.

Noise

The Project would increase the density and intensity of development at the Project Site that would result in construction and operations-related noise and vibration. As indicated in Section 4.13, *Noise and Vibration*, of this EIR, the Project would result in the following noise and vibration impacts:

Less Than Significant:

- On-site construction noise (construction equipment and activity)
- Off-site construction noise (traffic)
- On-site operational noise (stationary mechanical equipment, parking structure, loading dock, and activity)
- Off-site operational noise (traffic)
- Composite operational noise

- Construction vibration (human annoyance)
- Operational vibration (damage to adjacent buildings and human annoyance)

Less Than Significant After Mitigation:

- Construction vibration (damage to adjacent buildings)

Significant Unavoidable:

- Construction vibration (disruption of certain adjacent vibration-sensitive medical uses)

As indicated above, the Project would result in less than significant construction and operational noise and vibration for all the vibration and noise types except construction vibration that could lead to damage of adjacent buildings, and this impact would be less than significant with implementation of the mitigation recommended in Section 4.13. As indicated in Section 4.13, the Project would also: (1) implement project design features (e.g., locating construction staging as far from sensitive receptors as possible, limiting engine idling, using temporary noise barriers during construction, etc.) that would minimize Project noise; and (2) comply with applicable noise regulations (e.g., limiting construction activities to daylight hours, meeting exterior noise level requirements of the SMMC, etc.) that have been formulated to avoid significance noise and vibration impacts. Furthermore, existing PSJHC Phase I buildings are located between some of the proposed new development and existing adjacent sensitive receptors that would shield some adjacent off-site sensitive receptors from the Project. Lastly, Project construction activities, which would generate the highest levels of noise and vibration, would be temporary, while the existing medical, residential and parking uses at the Project Site already generate operational noise at the Project Site and in the surrounding neighborhood. For all these reasons, the Project would not result in noise and vibration that exceeds applicable thresholds at sensitive receptors in the surrounding neighborhood, and Project neighborhood effects impacts related to noise and most project vibration would be less than significant.

As further discussed in Section, Project construction activities could potentially result in significant unavoidably temporary construction-related vibration impacts involving disruption of the operations of some immediately adjacent vibration-sensitive medical uses. However, any such impacts would not represent significant neighborhood effects due to the limited spatial extent of such impacts.

Transportation

As indicated in Section 4.17, *Transportation*, of this Draft IR, the Project would result in the following traffic impacts:

Less Than Significant Before Mitigation:

- Conflicts with programs/plans/ordinances/policies addressing the circulation system:
  - Construction traffic impacts
  - Operational intersection level of service (LOS (majority of study intersections)
  - Operational street segment LOS (majority of study street segments)
  - CMP facilities

    - CMP Traffic
    - CMP Transit
  - Alternative Transportation Plans and Policies
    - Vehicle miles travelled (VMT)
- Hazards due to design features

Emergency Access

Significant Unavoidable:

Conflicts with programs/plans/ordinances/policies addressing the circulation system:

Operational intersection LOS (14 intersections)*

Operational street segment LOS (six street segments)

* If appropriate approvals are granted by the City of Los Angeles (and by Caltrans in the case of Intersection 81) in conjunction with the mitigation measures identified in Section 4.17, *Transportation*, of this EIR, impacts at Intersections 70, 77, and 81 would be mitigated to less than significant levels.

As indicated above, with implementation of the proposed project design features, the Project would result in less than significant impacts before mitigation with respect to: LOS at the majority of the study intersections and street segments during Project operations; CMP facilities; alternative transportation plans and policies, VMT; hazards due to design features; and emergency access. However, as indicated above, the Project would result in significant unavoidable LOS impacts at 14 intersections and six street segments (see Section 4.17 for listing).[2] While the majority of these impacts would occur along regional (e.g., Pico Boulevard, Olympic Boulevard, Santa Monica Boulevard, Wilshire Boulevard, etc.) rather than on neighborhood streets, some of these impacts would occur on neighborhood streets (e.g., 20th Street, 23rd Street, Arizona Avenue, etc.). It is noted that: (1) the Project would implement a TDM program and other measures to minimize traffic impacts; (2) the Project would represent the intensification of urban density on an infill site in proximity to mass transit that would reduce regional vehicle miles travelled (VMT); and (3) many of the intersections and street segments where significant unavoidable impacts would occur are already operating at substandard LOS, such that the addition of even one additional trip would represent a significant unavoidable impact. Regardless, most of the streets to be significantly impacted by the Project bisect the Mid-City neighborhood. As such, Project operational traffic would result in significant unavoidable traffic-related neighborhood effects (e.g., increased local traffic congestion and associated level of service impacts).

4.12.4.5 Cumulative Impacts

A project can result in cumulative neighborhood effects when other nearby projects are located within the same neighborhood and contribute with a proposed project to changes in aesthetics, air

[2] If appropriate approvals are granted by the City of Los Angeles (and by Caltrans in the case of Intersection 81) in conjunction with the mitigation measures identified in Section 4.17, *Transportation*, of this EIR, impacts at Intersections 70, 77, and 81 would be mitigated to less than significant levels.

quality, land use, noise and traffic conditions within that neighborhood. Chapter 3 of this EIR provides a list of 131 cumulative projects that are proposed, approved, or are under construction in the vicinity of the Project Site. Table 3-1, *Cumulative Projects List*, in Chapter 3 includes the list of cumulative projects compiled by the City. Of the cumulative projects (e.g., projects pending development, under construction, or recently completed), two are located in the immediate Project vicinity. These include 2225 Broadway (Cumulative Project No. 34, a 15 multi-family residential units) located immediately east of Development Site S2, and 1450 Cloverfield (Cumulative Project No. 35, 34 residential units) located one-half block east of Development Site S2 and separated from the Project Site by intervening development. As indicated in Figure 3-1, *Cumulative Projects Map*, in Chapter 3, several additional cumulative projects are located approximately one block from the Project Site. These include Cumulative Project Nos. 18, 20, 22, 27, 46, 51, 81, and 112, all of which are separated from the Project Site by intervening development.

Aesthetics

As indicated above, the Project would result in less than substantial effects for all of the aesthetics issues analyzed (e.g., visual character, light and glare, etc.), while as indicated in Section 4.1, *Aesthetics*, cumulative impacts would be less than substantial for all the aesthetics issues.

In addition, the Project, in combination with the cumulative projects, would add to the intensification of development within an already highly urbanized area, with both the Project and many of the cumulative projects redeveloping already developed infill sites. Hence, while increased development and light/glare would be visible in the Mid-City neighborhood over time, and slightly increased shading would occur, these changes would not represent substantial changes in aesthetics conditions in Mid-City.

Also, there are three cumulative projects in the Project Site vicinity that could potentially have cumulative visual quality impacts in combination with the Project: the 2225 Broadway mixed-use project, 1419 19th Street Project, and 1242 20th Street Wellness Center Project. Other cumulative projects are located at such a distance or blocked by intervening development such that they would not be visible with the Project from local surrounding vantages. Each of these cumulative projects would be limited in height and scale, and like the proposed Project would be surrounded on all sides by urban development and undergo City design review. Therefore, the combined aesthetics impacts of the Project and these cumulative projects would not be considered a substantial cumulative aesthetic effect on the greater Mid-City neighborhood.

Furthermore, because the Project's aesthetics impacts would not be substantial, its contribution to cumulative aesthetics impacts would not be cumulatively considerable.

Lastly, the proposed Project represents an urban infill project within 1/2-mile of a major transit stop, and thus qualifies for CEQA streamlining under Senate Bill (SB) 743. Hence, the Project's aesthetics impacts (including its contribution to cumulative aesthetics impacts) shall not be considered significant effects on the environment.

For all these reasons, cumulative neighborhood effects related to aesthetics would be less than significant.

Air Quality

The Project analysis for air quality in Section 4.2 of this EIR take into account increases in regional air emissions from cumulative growth (e.g., both the future baseline and future with project analysis scenarios are based on future baseline conditions that take into account the air emissions from the cumulative projects and other growth in City and air district). Hence, cumulative air quality impacts, and thus associated cumulative neighborhood effects, would not be greater than those identified for the Project above (e.g., less than significant or less than significant after mitigation for all the air quality issues (the Project would result in significant unavoidable regional NOx emissions, but these regional emissions would not have significant neighborhood effects).

Land Use

As indicated above, the Project would result in less than significant impacts for all of the land use issues analyzed (e.g., consistency with applicable land use and neighborhood effects-related goals, policies and standards, consistency with zoning requirements, etc.), while as indicated in Section 4.11, *Land Use and Planning*, cumulative impacts would be less than significant for all the land use issues. In addition, like the Project, the cumulative projects would be consistent with applicable land use designations or zoning, or made consistent through amendments and rezones, and would be required by the City to be consistent with the majority of the goals, objectives and policies of the City's LUCE, zoning, and other applicable land use plans and standards. For the Project, this includes consistency with the LUCE, HASP, PSHJC DA, Phase II Master Plan, Zoning Ordinance, and the neighborhood effects policies of the LUCE and HASP, while for those cumulative projects within the majority of the Mid-City neighborhood, this includes consistency with the LUCE, HASP, and the neighborhood effects policies of these planning documents. Furthermore, like the Project, many if not most of the cumulative projects would represent infill development within the proximity of transit, and the provision of frontage improvements such as new/improved sidewalks, transit stops, etc., which would support SCAG and LUCE goals encouraging increased transit use and reduced VMT. Lastly, the Project's contribution to cumulative impacts would not be cumulatively considerable. For all these reasons, Project and cumulative land use impacts, and thus cumulative land use-related neighborhood effects, would be less than significant.

Noise

As indicated above, the Project would result in less than significant impacts or less than significant impacts after mitigation for most of the noise and vibration issues analyzed (e.g., on-site construction noise, construction and operational traffic noise, composite operational noise, operational vibration, etc.). As indicated in Section 4.13, *Noise and Vibration*, of this EIR, cumulative noise and vibration impacts would be less than significant for all the noise and vibration issues. In addition, as with the Project, most if not all of the cumulative projects would: (1) implement project design features to minimize Project noise; and (2) comply with applicable noise regulations (e.g., limiting construction activities to daylight hours, meeting exterior noise level requirements of the SMMC, etc.) that have been formulated to avoid significance noise and vibration impacts. Furthermore, existing PSJHC Phase I buildings are located between some of the proposed new development and existing adjacent sensitive receptors that would shield some adjacent off-site sensitive receptors from the Project, and the same would be expected to be true for many of the cumulative projects. Lastly, construction activities associated with the Project and

the cumulative projects, which would generate the highest levels of noise and vibration, would be temporary, while existing uses at many of the development sites to be redeveloped already generate operational noise in the surrounding Mid-City neighborhood. For all these reasons, cumulative noise and most vibration impacts, and associated neighborhood effects, would be less than significant.

As indicated previously, Project construction activities would result in temporary significant unavoidable vibration impacts on some immediately adjacent vibration-sensitive medical uses. However, because of the limited spatial extent of such impacts, associated significant cumulative neighborhood effects would not occur.

Transportation

The Project analysis for traffic in Section 4.17 of this EIR takes into account increases in regional traffic from cumulative growth (e.g., the future and future with project scenarios analyzed that take into account the traffic from cumulative projects). Hence, traffic impacts, and thus associated cumulative neighborhood effects, would not be greater than those identified for the Project above (e.g., less than significant or less than significant after mitigation for all the traffic issues, except operational intersection and street segment LOS impacts which would be significant unavoidable).

4.12.5 Mitigation Measures

No mitigation measures, beyond those already identified in the Air Quality and Noise/Vibration sections of this EIR, are required for the neighborhood effects of the Project in terms of aesthetics, air quality, land use, and noise, and for the majority of the traffic issues analyzed.

No mitigation is available for the significant neighborhood effects of the Project in terms of one of the traffic issues analyzed (e.g., operational intersection and street segment LOS).

4.12.6 Level of Significance After Mitigation

Project neighborhood effects in terms of aesthetics, air quality, land use, noise, and the majority of the traffic issues analyzed would be less than significant.

Project neighborhood effects in terms of one of the traffic issues analyzed (e.g., operational intersection and street segment LOS) would be significant unavoidable.

4.13 Noise and Vibration

4.13.1 Introduction

This section analyzes potential noise and vibration impacts associated with the Project. The analysis describes the existing noise environment in the Project Site area, estimates future noise and vibration levels generated from construction and operation of the Project at surrounding noise sensitive land uses, identifies the potential for significant impacts, and any mitigation measures required. An evaluation of the Project's contribution to potential cumulative noise impacts is also provided. Noise worksheets and technical data used in this analysis are provided in Appendix J of this EIR.

4.13.2 Environmental Setting

4.13.2.1 Fundamentals of Noise and Vibration

Noise

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is generally defined as unwanted sound (i.e., loud, unexpected, or annoying sound). Acoustics is defined as the physics of sound. In acoustics, the fundamental scientific model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determines the sound level and characteristics of the noise perceived by the receiver. Acoustics addresses primarily the propagation and control of sound.

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement. The dB scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to the threshold of human hearing and 120 to 140 dB corresponding to the threshold of pain. Pressure waves traveling through air exert a force registered by the human ear as sound.

Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. Typically, sound does not consist of a single frequency, but rather a broad band of frequencies varying in levels of magnitude. When all the audible frequencies of a sound are measured, a sound spectrum is plotted consisting of a range of frequency spanning 20 to 20,000 Hz. The sound pressure level, therefore, constitutes the additive force exerted by a sound corresponding to the sound frequency/sound power level spectrum.

Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. Typically, sound does not consist of a single frequency, but rather a broad band of frequencies varying in levels of magnitude, with audible frequencies of the sound spectrum ranging from 20 to 20,000 Hz. The typical human ear is not equally sensitive to this frequency range. As a consequence, when assessing potential noise impacts, sound is measured

using an electronic filter that deemphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to these extremely low and extremely high frequencies. This method of frequency filtering or weighting is referred to as A-weighting, expressed in units of A-weighted decibels (dBA), which is typically applied to community noise measurements. Some representative common outdoor and indoor noise sources and their corresponding A-weighted noise levels are shown in **Figure 4.13-1**, *Decibel Scale and Common Noise Sources*.

Noise Exposure and Community Noise

An individual's noise exposure is a measure of noise over a period of time; a noise level is a measure of noise at a given instant in time, as presented in Figure 4.13-1. However, noise levels rarely persist at that level over a long period of time. Rather, community noise varies continuously over a period of time with respect to the sound sources contributing to the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with many of the individual contributors unidentifiable. The background noise level changes throughout a typical day, but does so gradually, corresponding with the addition and subtraction of distant noise sources, such as changes in traffic volume. What makes community noise variable throughout a day, besides the slowly changing background noise, is the addition of short-duration, single-event noise sources (e.g., aircraft flyovers, motor vehicles, sirens), which are readily identifiable to the individual.

These successive additions of sound to the community noise environment change the community noise level from instant to instant, requiring the noise exposure to be measured over periods of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts. The following noise descriptors are used to characterize environmental noise levels over time, which are applicable to the Project.

L_{eq}: The equivalent sound level over a specified period of time, typically, 1 hour (L_{eq}). The L_{eq} may also be referred to as the average sound level.

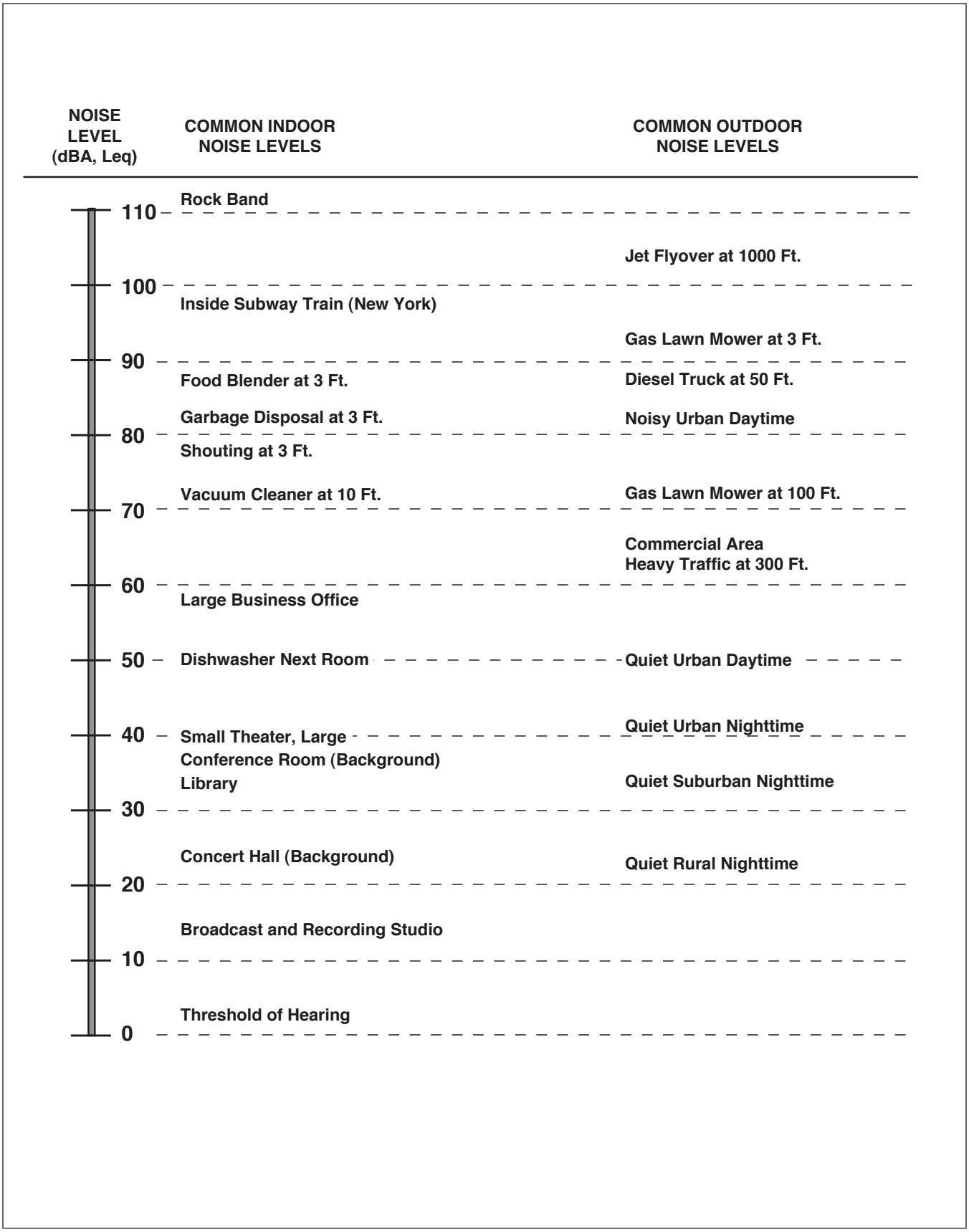
L_{max}: The maximum, instantaneous noise level experienced during a given period of time.

L_{min}: The minimum, instantaneous noise level experienced during a given period of time.

L_x: The noise level exceeded a percentage of a specified time period. For instance, L_{50} and L_{90} represent the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.

L_{dn}: The average A-weighted noise level during a 24-hour day, obtained after an addition of 10 dB to measured noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account nighttime noise sensitivity. The L_{dn} is also termed the day-night average noise level (DNL).

CNEL: The Community Noise Equivalent Level (CNEL) is the average A-weighted noise level during a 24-hour day that includes an addition of 5 dB to measured noise levels between the hours of 7:00 p.m. to 10:00 p.m. and an addition of 10 dB to noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.



SOURCE: State of California, Department of Transportation (Caltrans), Technical Noise Supplement (TeNS). October 1998. Available: http://www.dot.ca.gov/hq/env/noise/pub/Technical Noise Supplement.pdf

Providence Saint John's Health Center Phase II Project

Figure 4.13-1
Decibel Scale and Common Noise Sources

ESA

Effects of Noise on People

Noise is generally loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity that is a nuisance or disruptive. The effects of noise on people can be placed into four general categories:

- Subjective effects (e.g., dissatisfaction, annoyance);
- Interference effects (e.g., communication, sleep, and learning interference);
- Physiological effects (e.g., startle response); and
- Physical effects (e.g., hearing loss).

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects interrupt daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and interference with sleep. Sleep interference effects can include both awakening and arousal to a lesser state of sleep.

With regard to the subjective effects, the responses of individuals to similar noise events are diverse and influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity. Overall, there is no completely satisfactory way to measure the subjective effects of noise, or the corresponding reactions of annoyance and dissatisfaction on people. A wide variation in individual thresholds of annoyance exists, and different tolerances to noise tend to develop based on an individual's past experiences with noise. Thus, an important way of predicting a human reaction to a new noise environment is the way it compares to the existing environment to which one has adapted (i.e., comparison to the ambient noise environment). In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be judged by those hearing it. With regard to increases in A-weighted noise level, the following relationships generally occur (Caltrans 2013):

- Except in carefully controlled laboratory experiments, a change of 1 dBA in ambient noise levels cannot be perceived;
- Outside of the laboratory, a 3 dBA change in ambient noise levels is considered to be a barely perceivable difference;
- A change in ambient noise levels of 5 dBA is considered to be a readily perceivable difference; and
- A change in ambient noise levels of 10 dBA is subjectively heard as doubling of the perceived loudness.

These relationships occur in part because of the logarithmic nature of sound and the decibel scale. The human ear perceives sound in a non-linear fashion; therefore, the dBA scale was developed. Because the dBA scale is based on logarithms, two noise sources do not combine in a simple

additive fashion, but rather logarithmically. Under the dBA scale, a doubling of sound energy corresponds to a 3 dBA increase. In other words, when two sources are each producing sound of the same loudness, the resulting sound level at a given distance would be approximately 3 dBA higher than one of the sources under the same conditions. For example, if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA. Under the dBA scale, three sources of equal loudness together produce a sound level of approximately 5 dBA louder than one source, and ten sources of equal loudness together produce a sound level of approximately 10 dBA louder than the single source (Caltrans 2013).

Noise Attenuation

When noise propagates over a distance, the noise level reduces with distance depending on the type of noise source and the propagation path. Noise from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, referred to as "spherical spreading." Stationary point sources of noise, including stationary mobile sources such as idling vehicles, attenuate (i.e., reduce) at a rate between 6 dBA for acoustically "hard" sites and 7.5 dBA for "soft" sites for each doubling of distance from the reference measurement, as their energy is continuously spread out over a spherical surface (e.g., for hard surfaces, 80 dBA at 50 feet attenuates to 74 at 100 feet, 68 dBA at 200 feet, etc.). Hard sites are those with a reflective surface between the source and the receiver, such as asphalt or concrete surfaces or smooth bodies of water. No excess ground attenuation is assumed for hard sites and the reduction in noise levels with distance (drop-off rate) is simply the geometric spreading of the noise from the source. Soft sites have an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees, which in addition to geometric spreading, provides an excess ground attenuation value of 1.5 dBA (per doubling distance) (Caltrans 2013).

Roadways and highways consist of several localized noise sources on a defined path, and hence are treated as "line" sources, which approximate the effect of several point sources. Noise from a line source propagates over a cylindrical surface, often referred to as "cylindrical spreading." Line sources (e.g., noise from vehicles) attenuate at a rate between 3 dBA for hard sites and 4.5 dBA for soft sites for each doubling of distance from the reference measurement (Caltrans 2013). Therefore, noise due to a line source attenuates less with distance than that of a point source with increased distance.

Additionally, receptors located downwind from a noise source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Atmospheric temperature inversion (i.e., increasing temperature with elevation) can increase sound levels at long distances (e.g., more than 500 feet). Other factors such as air temperature, humidity, and turbulence can also have significant effects on noise levels (Caltrans 2013).

Vibration

Vibration can be interpreted as energy transmitted in waves through the ground or man-made structures, which generally dissipate with distance from the vibration source. Because energy is lost during the transfer of energy from one particle to another, vibration becomes less perceptible with increasing distance from the source.

As described in the *Caltrans Transportation and Construction Guidance Manual (Caltrans 2013)*, ground-borne vibration can be a serious concern for residences in proximity to a transit system route or maintenance facility, causing buildings to shake and rumbling sounds to be heard. In contrast to airborne noise, ground-borne vibration is not a common environmental problem, as it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of ground-borne vibration are trains, heavy trucks traveling on rough roads, and construction activities, such as blasting, pile-driving, and operation of heavy earth-moving equipment such as vibratory rollers for compacting soil for paving.

There are several different methods used to quantify vibration including peak particle velocity (PPV) expressed in inches per second (in/sec) and root mean square (RMS) velocity expressed in in/sec or decibels (VdB). Vibration information for this report is described in terms of the PPV for potential structural damage assessment, impact to vibration sensitive medical equipment; and for human perception and annoyance.

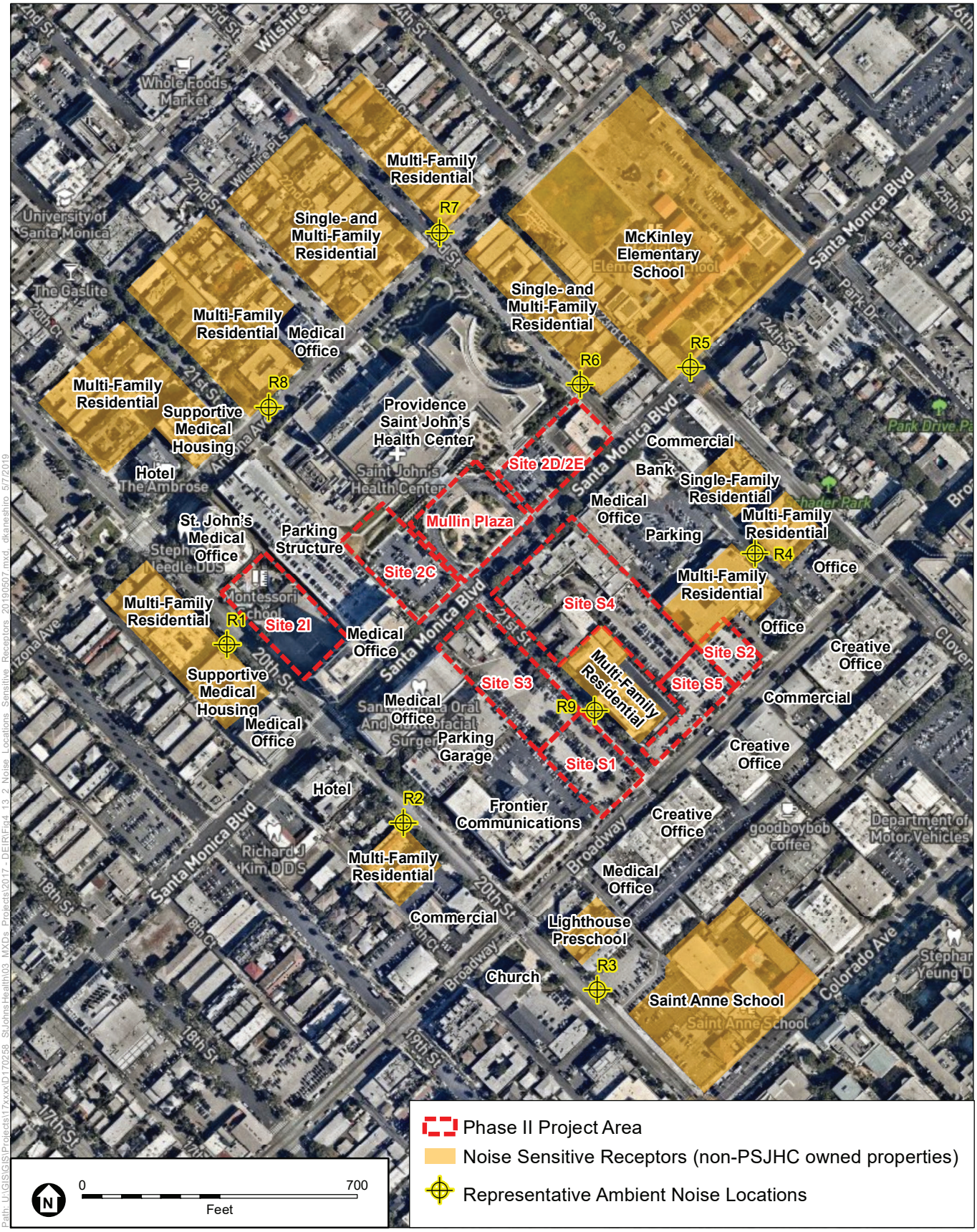
The effects of ground-borne vibration include movement of the building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. In extreme cases, the vibration can cause damage to buildings. Building structural damage is not typically a factor for most projects, unless blasting and pile-driving during construction, or the operation of heavy construction equipment adjacent to structures (i.e., typically within approximately 50 feet). Human annoyance from vibration often occurs when the vibration levels exceed the threshold of perception by only a small margin. A vibration level that causes annoyance will be at a level well below the damage threshold for most buildings, unless the building is considered fragile due to the building materials used. For example, the California Department of Transportation (Caltrans) guideline vibration annoyance criteria for a strongly perceptible human response (from continuous/frequent intermittent sources) is 0.1 in/sec PPV, while the Caltrans guideline vibration damage potential threshold criteria for modern commercial buildings (from continuous/frequent intermittent sources) is 0.5 in/sec PPV (Caltrans 2013).

4.13.2.2 Existing Condition

Noise-Sensitive Receptors and Locations

Some land uses are considered more sensitive to noise than others due to the amount of noise exposure and the types of activities typically involved at the land use requiring quiet, such as sleeping, concentrating, and convalescing. The City's Noise Ordinance in Chapter 4.12 of the Santa Monica Municipal Code (SMMC) defines noise sensitive land uses as public or private schools, places of worship, cemeteries, libraries, hospitals and similar health care institutions. The City also considers residential land uses as noise sensitive uses.

The non-PSJHC-owned noise sensitive land uses located in proximity to the Project Site are shown in **Figure 4.13-2**, *Noise Measurement Locations and Noise Sensitive Receptors*, and include one- to four-story single- and multi-family residential located along 20th Street, 21st Street, 23rd Street, Arizona Avenue, Santa Monica Boulevard, and Cloverfield Boulevard; the McKinley Elementary School on Santa Monica Boulevard; and the Lighthouse Christian Preschool and the Saint Anne School on 20th Street. All other noise-sensitive uses, located at greater distances from the Project Site or blocked by existing structures, would experience lower noise levels and were not evaluated.



SOURCE: OpenStreetMap, 2018

Providence Saint John's Health Center Phase II Project

Figure 4.13-2
Representative Ambient Noise Locations and Noise Sensitive Receptors

ESA

Ambient Noise Levels

The predominant existing noise source on the Project Site and surrounding areas is vehicular traffic on the roadways surrounding the Project Site including Arizona Avenue, 23rd Street, 21st Street, 20th Street, and Broadway, and Santa Monica Boulevard bisecting the Project Site. Secondary noise sources on the Project Site include activities related to the operation of the PSJHC and surrounding commercial businesses including occasional sirens from ambulances arriving at the PSJHC emergency room, loading area/delivery truck activities, trash compaction, and refuse collection.

On Wednesday, August 23, 2018, short-term (10-minute duration) daytime ambient noise measurements were conducted during the peak AM commuter traffic period at locations shown in **Figure 4.13-2** that represent the ambient noise environment at or in the vicinity of the nearby noise sensitive receptors listed above. A summary of noise measurements is provided in **Table 4.13-1**, *Summary of Ambient Noise Measurements*, and details are included in Appendix J of this EIR.

TABLE 4.13-1
SUMMARY OF AMBIENT NOISE MEASUREMENTS

Measurement Locations	Start Time	End Time	Measured Leq dBA
R1	9:07	9:17	68.7
R2	8:55	9:05	70.4
R3	8:43	8:53	69.8
R4	8:26	8:36	68.0
R5	8:12	8:22	73.8
R6	8:00	8:10	67.2
R7	7:47	7:57	69.7
R8	7:35	7:45	63.1

Measurements were conducted on the morning of August 23, 2018 during the peak AM traffic period using a Larson Davis Precision Integrated Sound Level Meter (SLM), model LxT, which is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification.

SOURCE: ESA, 2018.

The representative ambient noise locations (R1 through R9), shown in Figure 4.13-2, are described as follows:

- **R1**: Multi-family residential (ranging from two to three stories) located immediately adjacent to 20th Street, between Arizona Avenue and Santa Monica Boulevard;
- **R2**: Multi-family residential (ranging from two to three stories) located immediately adjacent to 20th Street and adjacent to 21st Street, between Santa Monica Boulevard and Broadway;
- **R3**: The Lighthouse Christian Preschool and the Saint Anne School located immediately adjacent to 20th Street, just south of Broadway;
- **R4**: Single- and multi-family residential uses (ranging from one to two stories) immediately adjacent to 23rd Street and 21st Street, between Santa Monica Boulevard and Broadway;
- **R5**: McKinley Elementary School located immediately adjacent to Santa Monica Boulevard at its intersection with Cloverfield Boulevard;
- **R6**: Single- and multi-family residential uses (three-story) located immediately adjacent to 23rd Street, between Arizona Avenue and Santa Monica Boulevard;
- **R7**: Single- and multi-family residential uses (ranging from one to two stories) located immediately adjacent to 23rd Street at its intersection with Arizona Avenue;
- **R8**: Multi-family residential uses located immediately adjacent to Arizona Avenue northwest of its intersection with 21st Street; and
- **R9**: Single- and multi-family residential uses (ranging from one to two stories) immediately adjacent to 21st Street, between Santa Monica Boulevard and Broadway.

Existing Traffic Noise Levels

To characterize the project area's existing day/night noise environment, the noise levels attributed to existing traffic volumes on local roadways were estimated using a spreadsheet model developed based on the methodologies provided in Federal Highway Administration's (FHWA) Traffic Noise Model (TNM) Technical Manual (FHWA, 1998).

In addition, the California Department of Transportation (Caltrans) Technical Noise Supplement (TeNS) document (Caltrans, 2013) states that the peak hour traffic noise level would be equivalent to the Ldn level based on the assumptions of 1) the peak hour traffic volume would be 10 percent of the average daily traffic volume, and 2) the split of daytime and nighttime average daily traffic volume is 85/15 percent. Further, the CNEL level would be 0.3 dBA higher than Ldn level based on the assumption of 80 percent in daytime and 5 percent in evening time.

Table 4.13-2, *Predicted Existing Vehicular Traffic Noise Levels*, presents the calculated existing CNEL/peak hour levels from the existing traffic volumes in the vicinity of the Project Site.

TABLE 4.13-2
PREDICTED EXISTING VEHICULAR TRAFFIC NOISE LEVELS

Roadway Segment	Adjacent Land Use	Land Use Compatibility Category[a]	Existing CNEL/peak hour (dBA) at the Closest Receptor[b]
20th Street			
Between Montana Avenue and Wilshire Boulevard	Residential	Compatible with Mitigation	64.8
Between Wilshire Boulevard and Arizona Avenue	Residential/Commercial	Normally Incompatible	69.2
Between Arizona Avenue and Santa Monica Boulevard	Residential/Commercial	Clearly Incompatible	70.6
Between Santa Monica Boulevard and Broadway	Residential/Commercial	Normally Incompatible	70.0
Between Broadway and Colorado Avenue	Religious/Commercial	Compatible with Mitigation	71.1
Between Colorado Avenue and Olympic Boulevard	Residential/Commercial	Normally Incompatible	69.7
Between Olympic Boulevard and I-10 EB Off-Ramp	Commercial	Normally Incompatible	72.1
Between I-10 EB Off-Ramp and Delaware Avenue	Residential/Commercial	Compatible with Mitigation	69.3
Between Delaware Avenue and Pico Boulevard	Residential/Commercial	Compatible with Mitigation	69.2
21st Street			
Between Santa Monica Boulevard and Broadway	Residential/Hospital	Clearly Compatible	48.7
23rd Street			
Between Wilshire Boulevard and Arizona Avenue	Residential/Commercial	Compatible with Mitigation	63.3
Between Arizona Avenue and Santa Monica Boulevard	Residential/Hospital	Compatible with Mitigation	64.2
Between Santa Monica Boulevard and Broadway	Residential/Hospital	Clearly Compatible	58.2
Between Pico Boulevard and Ocean Park Boulevard	Residential	Compatible with Mitigation	65.0
Cloverfield Boulevard			
Between Santa Monica Boulevard and Broadway	Residential/Commercial	Compatible with Mitigation	68.8
Between Broadway and Colorado Avenue	Commercial	Compatible with Mitigation	69.6
Between Colorado Avenue and Olympic Boulevard	Commercial	Compatible with Mitigation	70.0
Between Olympic Boulevard and Michigan Avenue	Commercial	Compatible with Mitigation	71.8
Between I-10 EB On-Ramp and Virginia Avenue	Residential	Compatible with Mitigation	69.1

Roadway Segment	Adjacent Land Use	Land Use Compatibility Category[a]	Existing CNEL/peak hour (dBA) at the Closest Receptor[b]
Between Virginia Avenue and Pico Boulevard	Residential	Compatible with Mitigation	70.0
Between Pico Boulevard and Ocean Park Boulevard	Residential	Compatible with Mitigation	64.4
26th Street			
Between San Vicente Boulevard and Montana Avenue	Residential/Commercial	Compatible with Mitigation	67.7
Between Montana Avenue and Wilshire Boulevard	Residential/Commercial	Compatible with Mitigation	67.8
Between Wilshire Boulevard and Arizona Avenue	Residential/Commercial	Compatible with Mitigation	68.0
Between Arizona Avenue and Santa Monica Boulevard	Residential/Commercial	Compatible with Mitigation	68.2
Between Santa Monica Boulevard and Broadway	Residential/Commercial	Compatible with Mitigation	67.8
Between Broadway and Colorado Avenue	Park/Commercial	Compatible with Mitigation	68.0
Between Colorado Avenue and Olympic Boulevard	Commercial	Compatible with Mitigation	68.1
Centinela Avenue			
Between Wilshire Boulevard and Santa Monica Boulevard	Residential/Commercial	Compatible with Mitigation	64.4
Between Santa Monica Boulevard and Broadway	Residential/Commercial	Compatible with Mitigation	65.7
Between Broadway and Olympic Boulevard	Residential	Compatible with Mitigation	67.5
Between Olympic Boulevard and I-10 WB Ramp	Residential/Commercial	Compatible with Mitigation	68.2
Bundy Drive			
Between Wilshire Boulevard and Texas Avenue	Residential/Commercial	Normally Incompatible	70.1
Between Texas Avenue and Santa Monica Boulevard	Residential/Commercial	Normally Incompatible	70.5
Between Santa Monica Boulevard and Ohio Avenue	Commercial	Compatible with Mitigation	70.8
Between Ohio Avenue and Olympic Boulevard	Residential/Commercial	Normally Incompatible	71.7
Broadway			
Between Lincoln Boulevard and 14th Street	Residential/Commercial	Compatible with Mitigation	67.3
Between 14th Street and 17th Street	Residential/Commercial	Compatible with Mitigation	68.0
Between 17th Street and 20th Street	Residential/Commercial	Compatible with Mitigation	68.1

Roadway Segment	Adjacent Land Use	Land Use Compatibility Category[a]	Existing CNEL/peak hour (dBA) at the Closest Receptor[b]
Between 20th Street and 20th Place	Commercial	Compatible with Mitigation	65.2
Between 20th Place and 21st Street	Commercial	Compatible with Mitigation	65.4
Between 21st Street and Southeast Driveway	Residential/Commercial	Compatible with Mitigation	65.4
Between Southeast Driveway and 23rd Street	Residential/Commercial	Compatible with Mitigation	65.1
Between 23rd Street and Cloverfield Boulevard	Residential/Commercial	Compatible with Mitigation	68.4
Between Cloverfield Boulevard and 26th Street	Residential/Commercial	Compatible with Mitigation	67.0
Between 26th Street and Centinela Avenue	Residential	Compatible with Mitigation	66.0
Santa Monica Boulevard			
Between 14th Street and 17th Street	Commercial	Compatible with Mitigation	69.2
Between 17th Street and 20th Street	Commercial	Compatible with Mitigation	69.6
Between 20th Street and West Driveway	Hospital/Commercial	Compatible with Mitigation	66.8
Between East Driveway and 23rd Street	Hospital	Compatible with Mitigation	70.4
Between 23rd Street and Cloverfield Boulevard	Commercial	Compatible with Mitigation	70.8
Between Cloverfield Boulevard and 26th Street	Commercial	Compatible with Mitigation	69.9
Between 26th Street and Yale Street	Residential/Lodging/Commercial	Compatible with Mitigation	70.0
Between Yale Street and Centinela Avenue	Lodging/Commercial	Normally Incompatible	70.4
Wilshire Boulevard			
Between 14th Street and 17th Street	Commercial	Compatible with Mitigation	69.9
Between 17th Street and 20th Street	Commercial	Compatible with Mitigation	70.0
Between 20th Street and 23rd Street	Religious/School/Commercial	Clearly Incompatible	70.2
Between 23rd Street and 26th Street	Park/Commercial	Normally Incompatible	70.1
Between 26th Street and Yale Street	Commercial	Clearly Incompatible	70.5
Between Yale Street and Berkeley Street	Commercial	Clearly Incompatible	70.6

Roadway Segment	Adjacent Land Use	Land Use Compatibility Category[a]	Existing CNEL/peak hour (dBA) at the Closest Receptor[b]
Arizona Avenue			
Between 14th Street and 17th Street	Hospital/Residential	Compatible with Mitigation	64.1
Between 17th Street and 20th Street	Residential/Commercial	Compatible with Mitigation	64.3
Between 20th Street and 21st Street	Lodging/Hospital/Commercial	Compatible with Mitigation	64.9
Between 21st Street and 22nd Street	Residential/Commercial	Compatible with Mitigation	65.5
Between 22nd Street and 23rd Street	Residential/Commercial	Compatible with Mitigation	65.4
Between 23rd Street and 26th Street	Residential/School	Compatible with Mitigation	64.4
Colorado Avenue			
Between Lincoln Boulevard and 20th Street	Religious/Commercial	Normally Incompatible	64.4
Between 20th Street and Cloverfield Boulevard	Religious/School /Residential/Commercial	Compatible with Mitigation	68.0
Between Cloverfield Boulevard and 26th Street	Commercial		67.6

[a] Clearly Compatible: Land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

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

Normally Incompatible: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Incompatible: New construction or development should generally not be undertaken.

[b] Calculated based on existing traffic volumes.

SOURCE: City 1992, ESA, 2018.

Vibration-Sensitive Sources and Receptor Locations

Typically, ground-borne vibration, generated by man-made activities (i.e., rail and roadway vehicles, mechanical equipment and typical construction equipment), diminishes rapidly as the distance from the source of the vibration become greater. Some common sources of ground-borne vibration are trains, trucks and buses on rough roads, and construction activities, such as blasting, pile-driving, and operating heavy earth-moving equipment (Caltrans 2013). It is unusual for vibration from sources, such as buses and trucks traveling on roadways to be perceptible, even at locations close to major roads.

Vibration sensitive receptors that are typically more sensitive to vibration effects with regard to structural damage include old or historic buildings which are generally more structurally fragile, due to the building material used. Humans occupying structures near the operation of heavy construction equipment may also perceive the vibration generated, as an annoyance.

Additionally, hospitals and other medical buildings may include vibration sensitive equipment and activities potentially affected by construction vibration. However, for sensitive equipment, the vibration levels of concern can be more than 100 times lower than those associated with even minor cosmetic building damage. Vibration sensitive equipment typically have very detailed vibration criteria that are often frequency dependent (the allowable level varies depending on the frequency of the vibration). Controlling excessive floor vibrations is critical in modern healthcare facilities where high-resolution imaging and diagnostic equipment are often used including Magnetic Resonance Imaging (MRI) and Computed Tomography (CT) equipment, and mass spectrometers, that have stringent floor vibration criteria to ensure the accuracy of their results. Controlling floor vibrations is further complicated as healthcare facilities are being renovated and upgraded to meet current healthcare demands, while remaining in operation.

Project vibration sensitive receptors include the previously identified noise sensitive receptors (i.e., residences), shown in Figure 4.13-2, and other buildings (i.e., commercial and industrial structures, and medical buildings) located adjacent to and in proximity to the Project construction area that could be potentially damaged structurally by vibration and/or result in human annoyance. In addition, in light of the vibration sensitivity of medical uses, the medical buildings located in proximity to the Project Site, may include vibration sensitive medical equipment and uses that could be adversely by Project construction vibration effects.

Existing Ground-borne Vibration Levels

Aside from periodic construction work in the Project Site area, field observations noted that other existing sources of ground-borne vibration in the vicinity of the Project Site are limited to heavy-duty vehicular travel (refuse trucks, delivery trucks, etc.) on local roadways. Loaded haul trucks traveling on area roadways can generate ground-borne vibration velocity levels of approximately 0.076 in/sec PPV at 25 feet, where trucks pass over bumps in the road.

4.13.3 Regulatory Framework

4.13.3.1 Federal

There are no federal noise or vibration standards that directly regulate environmental noise related to the construction or operation of the Project.

4.13.3.2 State

California Building Standards Code (Title 24). Title 24 of the California Code of Regulations includes Sound Transmission Control requirements that establish uniform minimum noise insulation performance standards for new hotels, motels, dormitories, apartment houses, and dwellings other than detached single-family units. Specifically, Title 24 states that interior noise levels attributable to exterior sources shall not exceed 45 dBA CNEL in any habitable room of new

dwellings. Dwellings are to be designed so that interior noise levels would meet this standard for at least ten years from the time of building permit application.

California Department of Health Services

The State of California does not have statewide standards for environmental noise, but the California Department of Health Services (DHS) has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. The purpose of these guidelines is to maintain acceptable noise levels in a community setting for different land use types. Noise compatibility by different land use types is categorized into four general levels: "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable." For instance, a noise environment ranging from 50 dBA to 65 dBA CNEL is considered to be "normally acceptable" for multi-family residential uses, while a noise environment of 75 dBA CNEL or above is considered to be "clearly unacceptable" for multi-family residential uses.

In addition, California Government Code Section 65302(f) requires each county and city in the state to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in its general plan. The noise element must: identify and appraise noise problems in the community; recognize Office of Noise Control guidelines; and analyze and quantify current and projected noise levels.

The state has also established noise insulation standards for new multi-family residential units, hotels, and motels that would be subject to relatively high levels of transportation-related noise. These requirements are collectively known as the California Noise Insulation Standards (Title 24, California Code of Regulations). The noise insulation standards set forth an interior standard of 45 dBA CNEL in any habitable room. Where such units are proposed in areas subject to exterior noise levels greater than 60 dBA CNEL, the standards require an acoustical analysis demonstrating how dwelling units have been designed to meet the interior standard. Title 24 standards are typically enforced by local jurisdictions through the building permit application process.

California Department of Transportation

While there are no state or Caltrans regulatory vibration standards, the *Caltrans Transportation and Construction Vibration Guidance Manual* (Caltrans 2013) provides guidance and procedures that "should be treated as screening tools for assessing the potential for adverse vibration effects related to human perception, structural damage, and equipment. This document is not an official policy, standard, specification, or regulation, and should not be used as such."

The Caltrans vibration criteria for assessing structural damage and human perception are shown in **Table 4.13-3**, *Caltrans Vibration Structural Damage Potential Criteria,* and **Table 4.13-4**, *Caltrans Vibration Perception Potential Criteria,* respectively (Caltrans 2013).

TABLE 4.13-3
CALTRANS VIBRATION STRUCTURAL DAMAGE POTENTIAL CRITERIA

	Maximum PPV (in/sec)	
Structure and Condition	**Transient Sources**	**Continuous/Frequent Intermittent Sources**
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

NOTE: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

SOURCE: Caltrans 2013. Transportation and Construction Vibration Guidance Manual. September.

TABLE 4.13-4
CALTRANS VIBRATION PERCEPTION POTENTIAL CRITERIA

	Maximum PPV (in/sec)	
Structure and Condition	**Transient Sources**	**Continuous/Frequent Intermittent Sources**
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.10
Severe	2.0	0.4

NOTE: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

SOURCE: Caltrans 2013. Transportation and Construction Vibration Guidance Manual. September.

In addition, ground vibration also has the potential to disrupt the operation of vibration-sensitive medical research and advanced technology equipment. This equipment can include optical microscopes, cell probing devices, magnetic resonance imaging (MRI) machines, scanning electron microscopes, photolithography equipment, micro-lathes, and precision milling equipment. The degree to which this equipment is disturbed depends on the type of equipment, how it used, and its support structure. For example, equipment supported on suspended floors may be more susceptible to disturbance than equipment supported by an on-grade slab. As such, the Caltrans guidance does not provide specific numeric vibration criteria for all potential vibration sensitive medical uses (Caltrans 2013).

4.13.3.3 Local

City of Santa Monica General Plan

The purpose of a general plan is to ensure the land use compatibility of proposed development projects. The Noise Element of the City of Santa Monica General Plan provides guidance about acceptable noise levels based on land use categories. The City's guidance is based on the State guidelines for assessing the compatibility of various land use types with a range of noise levels for residential and commercial uses. The Noise Element provides generally acceptable noise level in CNEL for specific land uses classified into four categories: (1) "clearly compatible," (2) "compatible with mitigation," (3) "normally incompatible," and (4) "clearly incompatible." The Noise Element guidance is shown in **Table 4.13-5**, *Land Use/Noise Compatibility Matrix* for uses in the vicinity of the Project Site.

TABLE 4.13-5
LAND USE/NOISE COMPATIBILITY MATRIX

Land Use Categories		Compatible Land Use Zones (in CNEL)					
Category	**Uses**	**<60**	**60-65**	**65-70**	**70-75**	**75-80**	**>80**
Residential	Single-family, duplex, multiple-family	A	B	B	C	D	D
Commercial (Regional, District)	Hotel, motel, transient lodging	A	B	B	C	C	D
Commercial (Regional, Village District, Special)	Commercial retail, bank, restaurant, movie theatre	A	A	A	B	B	C
Commercial Industrial Institutional	Office building, research and development, professional offices, City office buildings	A	A	B	B	C	D
Commercial (Recreation) Institutional (Civic Center)	Amphitheatre, concert hall, auditorium, meeting hall	B	C	C	D	D	D
Open Space	Parks	A	A	B	C	D	D

ZONE A - Clearly Compatible: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

ZONE B - Compatible with Mitigation: New construction or development (i.e., substantial remodels and additions representing SO percent or more of existing square footage, including garage square footage), should be undertaken only after detailed analysis of the noise reduction requirements are made and needed noise insulation features in the design are determined. Conventional construction, with closed windows and fresh air supply systems on air conditioning, will normally suffice.

ZONE C - Normally Incompatible: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the design.

ZONE D - Clearly Incompatible: New construction or development should generally not be undertaken.

SOURCE: City of Santa Monica, General Plan Noise Element, 1992.

As shown in Table 4.13-5, exterior noise levels of 60 dBA CNEL and lower are "clearly compatible" for residential uses that include single family, duplex, and multiple family residences, while exterior noise levels of up to 70 dBA CNEL are "compatible with mitigation." Exterior noise levels of 70 dBA CNEL and lower are "clearly compatible" for commercial uses, while exterior noise levels up to 80 dBA CNEL are "compatible with mitigation." "Clearly compatible" is defined as the highest noise level that should be considered for the construction of new buildings that

incorporate conventional construction techniques, but without any special noise insulation requirements. "Compatible with mitigation" includes the highest noise levels that should be considered only after detailed analysis of the noise reduction requirements are made and needed noise insulation features are determined.

The land use compatibility guidelines and interior/exterior noise standards are designated for new development. In addition, policies and actions included in the City's General Plan Noise Element that guide new projects are identified below.

Policy 1: Provide for measures to reduce noise impacts from transportation noise sources.

Action 1.2: Provide for continued evaluation of truck movements and routes in the City to provide effective separation from residential or other noise sensitive land uses.

Policy 2: Incorporate noise considerations into land use planning decisions (as they apply to finished projects, not construction actions).

Action 2.2: Through the Noise Ordinance, incorporate noise reduction features during site planning to mitigate anticipated noise impacts on affected noise sensitive land uses. The noise referral zones identified in areas exposed to noise levels greater than 60 dB CNEL can be used to identify locations of potential conflict. New developments would be permitted only if appropriate mitigation measures are included such that the standards contained in this Element are met.

Action 2.3: Continue to enforce the State of California Uniform Building Code that specifies that the indoor noise levels for residential living spaces not exceed 45 dB CNEL due to the combined effects of all noise sources. The State requires implementation of this standard when the outdoor noise levels exceed 60 dB CNEL. The Noise Referral Zones (60 dB CNEL) can be used to determine when this standard needs to be addressed. The Uniform Building Code (specifically, the California Administrative Code, Title 24, Part 6, Division T25, Chapter 1, Subchapter 1, Article 4, Sections T25-28) requires that "Interior community noise levels (CNEL/LDN) with windows closed, attributable to exterior sources shall not exceed an annual CNEL or LDN of 45 dB in any habitable room." The code requires that this standard be applied to all new hotels, motels, apartment houses and dwellings other than detached single-family dwellings.

Policy 3: Develop measures to control non-transportation noise impacts.

Action 3.3: Require that new commercial and residential projects to be built near existing residential land use demonstrate compliance with the City Noise Ordinance prior to approval of the project. This shall include a requirement that all project plans show the location of mechanical equipment in relation to adjacent noise-sensitive (i.e., residential) uses. Require that all Building Permit applicants, including contractors, sign a form acknowledging requirements of the noise ordinance, and assuming responsibility for compliance with the noise ordinance. This is particularly important for the non-resident contractor installing mechanical equipment.

Policy 4: The City shall develop measures to control construction noise impacts.

Action 4.1: Consider incorporating the following provisions into the Noise Ordinance to address the problems of construction noise:

1. Clearly state the permitted hours of construction and expressly prohibit construction on Sunday.
2. During the environmental review of all projects requiring extensive construction, determine the proximity of the site to the established residential areas. If the project will involve pile-driving, nighttime truck hauling, blasting, 24-hour pumping (important in coastal excavations), or any other very high noise equipment, the environmental review shall include a construction noise alternative analysis. From this analysis, specific mitigation measures shall be developed to mitigate potential noise impacts. This may include but not be limited to:
   - Requirements to use quieter albeit costlier construction techniques.
   - Notification of residents (homeowners and renters) of time, duration, and location of construction.
   - Relocation of residents to hotels during noise construction periods.
   - Developer reimbursement to City for 24-hour on-site inspection to verify compliance with required mitigation.
3. Limit hours of operation of equipment 15 dB above noise ordinance limits to the hours of 10 a.m. to 4 p.m.".

City of Santa Monica Municipal Code

Noise and Vibration

The City's Noise Regulation is provided in Chapter 4.12 of the Santa Monica Municipal Code (SMMC). Section 4.12.050 designates noise zones, as follows: residential districts as Noise Zone I, commercial districts as Noise Zone II, and manufacturing/industrial districts as Noise Zone III. The Project Site consists of various development sites located in residential and commercial districts, and therefore, are located in Noise Zones I and II.

Section 4.12.060 defines exterior noise standards for each Noise Zone, as presented in **Table 4.13-6**, *City of Santa Monica Exterior Noise Standards*.

Section 4.12.070, with regard to vibration, states that "notwithstanding other sections of this Chapter, it shall be unlawful for any person to create, maintain or cause any ground vibration that is perceptible without instruments at any point on any property. For the purpose of this Chapter, the perception threshold shall be presumed to be more than 0.05 inches per second RMS velocity. The vibration caused by construction activity, moving vehicles, trains, and aircraft shall be exempt from this Section."

TABLE 4.13-6
CITY OF SANTA MONICA EXTERIOR NOISE STANDARDS

Noise Zone	Time Interval	Allowable Leq (dBA)	
		15-minute continuous measurement period	5-minute continuous measurement period
I	Monday-Friday		
	10 p.m. to 7 a.m.	50	55
	7 a.m. to 10 p.m.	60	65
	Saturday-Sunday		
	10 p.m. to 8 a.m.	50	55
	8 a.m. to 10 p.m.	60	65
II	All Days of Week		
	10 p.m. to 7 a.m.	60	65
	Monday-Friday		
	7 a.m. to 10 p.m.	65	70
III	Anytime	70	75

Notes:
If the ambient noise level exceeds the allowable exterior noise level standard, the ambient noise level shall be the standard.
Construction activity shall be subject to the noise standards set forth in Section 4.12.110 of SMMC.

SOURCE: SMMC, Section 4.12.060.

Section 4.12.110 describes restrictions on demolition, excavation, grading, spray painting, construction, maintenance, or repair of buildings, as follows:

(a) "No person shall engage in any construction activity during the following times anywhere in the City:

(1) Before eight a.m. or after six p.m. on Monday through Friday, except that construction activities conducted by employees of the City of Santa Monica or public utilities while conducting duties associated with their employment shall not occur before seven a.m. or after six p.m. on Monday through Friday;

(2) Before nine a.m. or after five p.m. on Saturday; and

(3) All day on Sunday.

(4) All day on New Year's Day, Martin Luther King's Birthday, President's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day, as those days have been established by the United States of America.

(b) Except as set forth in subsection (d) of this Section, the noise created by construction activity shall not cause:

(1) The equivalent noise level to exceed the noise standards specified in Section 4.12.060 of this Chapter, for the noise zone where the measurement is taken, plus twenty (20) dBA; or

(2) A maximum instantaneous A-weighted, slow sound pressure level to exceed the decibel limits specified in Section 4.12.060 of this Chapter for the noise zone where the measurement is taken plus forty dBA, for any period of time.

(c) Prior to the issuance of a building permit, all development projects located within five hundred feet of any residential development or other noise sensitive land uses must submit a

list of equipment and activities required during construction. In particular, this list shall include the following:

(1) Construction equipment to be used, such as pile drivers, jackhammers, pavement breakers or similar equipment;

(2) Construction activities such as 24-hour pumping, excavation or demolition; and

(3) A list of measures that will be implemented to minimize noise impacts on nearby residential uses.

(d) Any construction that exceeds the noise levels established in subsection (b) of this Section shall occur between the hours of ten a.m. and three p.m., Monday through Friday.

(e) A permit may be issued authorizing construction activity during the times prohibited by this Section whenever it is found to be in the public interest. The person obtaining the permit shall provide notification to persons occupying property within a perimeter of five hundred feet of the site of the proposed construction activity prior to commencing work pursuant to the permit. The form of the notification shall be approved by the City and contain procedures for the submission of comments prior to the approval of the permit. Applications for such permit shall be in writing, shall be accompanied by an application fee and shall set forth in detail facts showing that the public interest will be served by the issuance of such permit. Applications shall be made to the Building Officer. No permit shall be issued unless the application is first approved by the Director of Environmental and Public Works Management, the Building Officer, the Chief of Police and the Director of Planning and Community Development. The City Council shall establish by resolution fees for the filing and processing of the application required by this subsection (e) and any required compliance monitoring. This fee may be revised from time to time by resolution of the City Council".

Section 4.12.130 defines location, screening and noise measurements of mechanical equipment, as follows:

"All development project applications must demonstrate compliance with or contain the following information:

(f) A list of all permanent mechanical equipment to be placed outdoors and all permanent mechanical equipment to be placed indoors which may be heard outdoors. All such equipment shall require a noise analysis to demonstrate compliance with Section 4.12.060 of SMMC prior to the issuance of a building permit for the development project.

(g) Mechanical equipment shall not be located on the side of any building which is adjacent to a residential building on the adjoining lot unless it can be shown that the noise will comply with the requirements of Section 4.12.060 of SMMC. Roof locations may be used when the mechanical equipment is installed within a noise attenuating structure.

(h) Final approval of the location of any mechanical equipment will require a noise test to demonstrate compliance with Section 4.12.060 of SMMC. Equipment for the test shall be provided by the owner or contractor and the test shall be conducted by the owner or contractor. A copy of noise test results on mechanical equipment shall be submitted to the Community Noise Officer for review to ensure that noise levels do not exceed maximum allowable levels for the applicable noise zone".

Section 4.12.170 states that ""new development may only be permitted if noise mitigation measures are taken in project siting and design such that exterior noise levels meet equivalent noise level requirements of Section 4.12.060 of SMMC, and the standards contained in the Interior and

Exterior Noise Standards Matrix as contained in the Noise Element of the General Plan for any existing noise sources near the project or contained within the project".

4.13.4 Environmental Impacts

4.13.4.1 Thresholds of Significance

Appendix G of the State CEQA Guidelines provides a set of questions that address potential impacts related to noise and vibration, as follows:

Would the project result in:

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

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

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

Non-applicable Checklist Questions

Checklist Question (c) airport/airstrip noise: The Project Site is not located within an airport land use plan of the Santa Monica Airport. In addition, the Project Site is not located in the vicinity of a private airstrip. Therefore, the environmental topics related to airport/airstrip noise are not required to be evaluated in this EIR as no impacts due to Project implementation would occur.

For checklist questions a) and b), the following thresholds of significance are used to analyze the potential noise and vibration impacts, respectively, of the Project construction and operation:

Construction Noise (Temporary or Periodic Increase in Ambient Noise Levels Exceeding Standards)

The SMMC noise regulations establish noise standards for construction, which vary based on the day of the week and time of day, and the Noise Zone in which a project is located. The Project analysis of construction noise is based on criteria in the SMMC noise regulations. Project construction would result in a potentially significant noise impact if:

- On-site Project construction activities cause the resultant noise level to exceed the exterior noise standard defined in Section 4.12.060 (refer to Table 4.13-4), or the existing ambient noise level, if higher than the exterior noise standard (refer to Table 4.13-1), plus 20 dBA (for the average hourly equivalent noise level) or plus 40 dBA (for the maximum noise level) at the noise-sensitive receptors between 8 a.m. to 10 a.m. or 3 p.m. to 6 p.m. on Monday through Friday, or between 9 a.m. to 10 a.m. or 3 p.m. to 5 p.m. on Saturday

The above significance criterion from the SMMC recognizes that the timing of noise impacts is an important factor in determining significance - noise sensitivity is the lowest during the midday as opposed to early morning/evening hours when low noise levels are expected for sleep. In any urban

area, construction noise is a common occurrence during normal working hours on weekdays and abbreviated periods on Saturdays. Therefore, the City does not consider construction noise levels consistent with the SMMC noise level standards (which permit heightened noise levels between 10 am and 3 pm on weekdays) to constitute a significant noise impact.

With regard to off-site construction noise (e.g., construction vehicle and truck noise on freeways), impacts would be significant if:

- Off-site Project construction vehicles would cause existing exterior ambient noise levels to increase by 5 dBA CNEL or more.

This significance criterion is based on the fact that a noise level increase of 3 dBA is barely perceivable to most people, a 5 dBA increase is readily noticeable, and a difference of 10 dBA would be perceived as a doubling of loudness.

Operation Noise (Permanent Increase in Ambient Noise Levels Exceeding Standards)

The City does not have established criteria levels at which permanent increases in ambient noise are considered potentially significant. As discussed previously, a noise level increase of 3 dBA is barely perceivable to most people, a 5 dBA increase is readily noticeable, and a difference of 10 dBA would be perceived as a doubling of loudness. Therefore, the Project's operation noise impact would be considered significant if the following conditions occur:

- Project-related vehicular noise sources would cause existing exterior ambient noise levels to increase by 5 dBA CNEL or more, and the resulting noise falls on a noise-sensitive land use within an area categorized as either "clearly compatible" or "compatible with mitigation" as defined in the City's General Plan; or cause ambient noise levels to increase by 3 dBA CNEL or more, and the resulting noise falls on a noise-sensitive land use within an area categorized as either "normally incompatible" or "clearly incompatible"; or
- Project-related operational (i.e., non-roadway) and on-site noise sources, such as outdoor activities, building mechanical/electrical equipment, parking structure, etc., to exceed the noise standards defined in Section 4.12.060 of the SMMC, or increase ambient noise levels by 5 dBA at the adjacent noise sensitive receptors.

Excessive Groundborne Vibration (Human Perception and Annoyance)

Section 4.12.070 of the SMMC establishes a vibration human perception threshold of more than 0.05 in/sec RMS velocity.

Construction

Section 4.12.070 of the SMMC exempts vibration caused by construction activity from the requirements of Section 4.12.070.

Operation

The human perception vibration threshold of 0.05 in/sec RMS (equivalent to approximately 0.07 in/sec PPV) provided in Section 4.12.070 of the SMMC is applicable to operation vibration. Project operation would result in a potentially significant human annoyance vibration impact if:

- Project operation cause ground-borne vibration levels to exceed 0.05 in/sec RMS (0.07 in/sec PPV).

Excessive Groundborne Vibration (Structural Damage)

Caltrans vibration damage potential threshold criteria, previously described above in Table 4.13-3, are used to evaluate potential structural damage impacts related to vibration from Project construction and operation. Project construction or operation would result in a potentially significant structural damage vibration impact if:

- Project construction or operation cause ground-borne vibration levels to exceed the Caltrans criteria for the structure and condition of the building potentially impacted. For example: 0.5 in/sec PPV for modern commercial and new residential structures, 0.3 in/sec PPV for older residential structures, 0.25 in/sec PPV for historic and some old buildings, and 0.1 in/sec PPV for fragile buildings (Caltrans 2013). This analysis utilizes 0.3 in/sec PPV to develop screening distances for potential structural damage impacts to structures from Project construction and operation.

Excessive Groundborne Vibration (Vibration Sensitive Medical Uses)

Caltrans vibration criteria does not provide vibration impact levels for all potential vibration sensitive medical uses. Project construction or operation could result in a potentially significant vibration impact to vibration sensitive medical uses if Project construction and operation vibration exceeds:

- The maximum allowable vibration level pursuant to manufacturers' specifications for a specific piece of vibration sensitive medical equipment, or

- The "weighting factors for satisfactory magnitudes of building vibration with respect to human response" in ANSI/ASA S2.71-1983 (reaffirmed in 2012) in hospital operating rooms or critical working areas.

4.13.4.1 Methodology

The area surrounding the Phase II development sites or the Project Site includes buildings within and beyond the greater Campus owned/controlled by PSJHC as well as buildings not owned/controlled by PSJHC. The analysis assesses potential impacts to properties not owned by PSJHC, as well as those owned by PSJHC within the Campus. Project Design Features have been identified to reduce construction-related noise impacts.

On-Site Construction Noise

On-site Project construction noise impacts were evaluated by identifying the reference construction noise levels generated by the different types of construction activity and equipment anticipated, calculating the construction activity (e.g., demolition) noise levels at the source and attenuated by distance at nearby sensitive receptor locations, and comparing these construction-related noise levels respectively to the applicable City noise standards, and determining the increase in existing ambient noise levels (i.e., without construction noise) at the receptors. More, specifically, the following steps were undertaken to assess construction-period noise impacts.

1. Existing noise levels at surrounding sensitive receptor locations were measured during existing peak hour traffic volumes (see Table 4.13-2);
2. Typical noise levels for each type of the construction equipment were obtained from the FHWA Roadway Construction Noise Model (RNCM);
3. Distances between construction site locations (noise sources) and surrounding sensitive receptors were measured using Project architectural drawings, site plans, and Google Earth;
4. The construction noise level was then calculated, in terms of hourly Leq, for sensitive receptor locations based on the standard point source attenuation rate of 6.0 dBA for each doubling of distance; and
5. Construction noise levels were then compared to the construction noise significance thresholds identified below.

Off-Site Traffic Noise (Construction and Operations)

Project traffic noise impacts on area roadways were evaluated using a spreadsheet model developed based on the methodologies provided in FHWA's TNM Technical Manual (FHWA, 1998). Project specific traffic volume data is provided in the Project's Traffic Impact Analysis (TIA) (Fehr & Peers, 2019) and included in Appendix L of this EIR.

Traffic noise on area roadways, attributable to the existing (Approval Year 2019) and future (Buildout Year 2042) traffic volumes from Project development, was estimated using TNM, and compared to estimated traffic noise levels based on existing and future traffic volumes that would occur under the "Without Project" condition. Note – in Section 4.17 Transportation and Traffic, based on the Project TIA, Project traffic impacts are assessed for the Approval Year (2019), Interim Year (2031), and Future Year (2042) traffic forecasts on area roadways. However, while the Project would be built in phases over the long-term through the buildout year 2041, for the Project traffic noise analysis, CEQA requirements analyze traffic noise for the existing year and the future buildout year. The Future Buildout Year (2042) would be when Project traffic volumes would be the greatest, and therefore, the increase in traffic noise due the Project traffic volumes (i.e., noise impact) would be the greatest. Therefore, the Interim Traffic Year is not assessed for traffic noise, as it would have less Project traffic volumes and less traffic noise increases, compared to the Future Year.

Stationary Point Source Noise (Operations)

Stationary point source noise impacts were evaluated by identifying the noise levels generated by outdoor stationary noise sources, such as building rooftop mechanical equipment (e.g., heating, air conditioning, and ventilation (HVAC) and building loading area activity, calculating the hourly L_{eq} noise level from each noise source at sensitive receptor property lines, and comparing such noise levels to existing noise levels. More specifically, the following steps were undertaken to calculate outdoor stationary point source noise impacts:

1. Existing noise levels at surrounding sensitive receptor locations were estimated based on the existing traffic volumes (see Table 4.13-1);
2. Distances between stationary noise sources and surrounding sensitive receptor locations were measured using Project architectural drawings, Google Earth, and site plans;

3. Stationary-source noise levels were then calculated for each sensitive receptor location based on the standard point source noise-distance attenuation factor of 6.0 dB for each doubling of distance;
4. Noise level increases were compared to the stationary source noise significance thresholds identified below; and
5. For outdoor mechanical equipment, the maximum allowable noise emissions from any and all outdoor mechanical equipment were specified such that noise levels would not exceed the significance threshold identified below.

Ground-Borne Vibration (Construction and Operations)

Groundborne vibration impacts from Project construction were evaluated for potential building structural damage and vibration sensitive medical uses; SMMC exempts construction from its vibration human annoyance threshold. Potential structural damage from Project construction vibration is based on Caltrans vibration guidance (Caltrans 2013). Potential vibration impacts to vibration sensitive medical uses from Project construction and operation is based on manufacturers specifications of the individual piece of medical equipment and/or the specific operator of the medical equipment.

The Project construction vibration analysis was performed by identifying potential sources of Project construction vibration (i.e., operation of heavy construction equipment), estimating the maximum vibration levels generated at the source using the reference vibration data from the Caltrans document, estimating the distance between anticipated location of the equipment operation and the nearby vibration sensitive receptors (people, structures, and medical buildings with vibration sensitive medical uses), estimating the maximum vibration levels at the receptors due to distance attenuation, and comparing against the applicable significance criteria.

Project operation (which consists of routine medical/healthcare related, residential, retail, and childcare uses) is not anticipated to generate vibration that would result in vibration impacts.

4.13.4.3 Project Characteristics or Design Features

Construction

The precise construction timeline for each Phase II development will depend on the timing of entitlements and permit processing. For the purposes of this EIR, construction work is assumed to begin in the 2nd Quarter of 2021 with occupancy and operation of the first Phase II building commencing in late 2022, and completion of the entire construction program by the end of 2041.

The Phase II Project Phasing Plan consists of two alternate phasing plans: Phasing Plan A and Phasing Plan B, as noted above. Phasing Plan B, presented below, provides a similar type and intensity of land uses as Phasing Plan A, but will be implemented with an alternative construction schedule that allows PSJHC to pursue development on Site 2C as the first stage of construction.

In accordance with the SMMC, Project construction activities would be permitted to occur between 8 a.m. and 6 p.m. on Monday through Friday, and 9 a.m. to 5 p.m. on Saturday, unless permitted under an afterhours permit.

Land Use Characteristics

The Project proposes the construction and operation of new buildings and facilities within the existing PSJHC Campus. The Phase II Master Plan (the Project) allows for 10 Phase II Project buildings and associated infrastructure and open space improvements (Phase II Development Program). The Phase II Development Program would result in up to 682,700 square feet of new floor area or a net increase of 582,915 square feet with maximum building heights ranging from 36 feet to 105 feet (depending on site).

The Phase II Development Sites includes Sites 2I, 2C, 2D/E within the North Campus and Sites S1, S2, S3, S4, and S5 within the South Campus. These sites are depicted in Figure 2-3, Phase II Site Plan, and listed in Table 2-3, Phase II Development Summary, in Chapter 2. Together, these sites hereafter are referred to as "Project Site".

Project Design Features

In addition to compliance with SMMC requirements, the following Project Design Features (PDF) would be implemented to reduce Project-generated noise and were incorporated into analytical assumptions prior to the determination of potential impacts.

PDF-NOISE-1: The Applicant's construction contractor shall require implementation of the following construction best management practices (BMPs) by all construction contractors and subcontractors working in and around the Project Site to reduce construction noise levels:

- Project contractor(s) will equip all construction equipment, fixed and mobile, mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards;
- On-site construction equipment staging areas will be located as far as feasible from noise and vibration sensitive uses.
- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- As required by SMMC 9.21.140 B Screening, effective noise barriers will be designed and erected as needed to shield on-site uses from excessive construction-related noise.

PDF-NOISE-2: Exterior mechanical and electrical equipment such as HVAC equipment would be screened in accordance with Section 9.21.140 of the SMMC. In accordance with Section 4.12.130 of the SMMC, all outdoor mechanical equipment would be required to comply with noise limitation requirements provided in Section 4.12.060 of the SMMC.

4.13.4.4 Project Impacts

Noise Levels

Impact NOISE-1: *Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Impact Statement NOISE-1: Noise levels during construction activities would not exceed the noise standards established by the City. Therefore, impacts would be less than significant. Operation of the Project would increase noise levels at adjacent noise sensitive receptors due to traffic, mechanical equipment for the buildings, and use of outdoor open space; however, the noise increases would be substantially below the 5 dBA CNEL threshold. Therefore, the Project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in excess of City standards during construction or operations and impacts would be less than significant.

Construction Impacts

On-Site Construction

Project construction would require the use of heavy equipment during the demolition, grading, excavation, and construction activities at the Project Site. During each construction activity (e.g., demolition), there would be a different mix of equipment types and number, compared to another activity (e.g., grading). As such, noise levels of construction activity at and near the Project Site would fluctuate depending on the particular type, number, and duration of use of the various pieces of construction equipment. **Table 4.13-7**, *Construction Noise Levels by Phase*, presents the estimated maximum construction noise levels (Lmax) at 50 feet per construction phase. These noise levels would occur when equipment is operating under full power conditions. The estimated usage factor per equipment is also included in Appendix J, which are based on FHWA's RNCM Model User's Guide (FHWA, 2006).

TABLE 4.13-7
CONSTRUCTION NOISE LEVELS BY CONSTRUCTION PHASE

Construction Phase	Estimated Noise Level at 50 feet (dBA Lmax)
Demolition	79
Grading/Excavation	86
Foundation/Concrete Pour	78
Building Construction	81
Paving	84
Architectural Coating	81

SOURCE: ESA, 2019.

As shown in Table 4.13-7, the maximum noise level of the construction phases would be up to 86 dBA Lmax during the grading and excavation phase. To more accurately characterize construction noise levels over time, the hourly average noise level (L_{eq}) associated with each construction phase is calculated based on the quantity, type, and usage factors for each type of equipment used during each construction phase, and typically attributable to multiple pieces of equipment operating simultaneously. In addition, some construction phases on the various sites could potentially overlap with each other.

Construction noise levels were estimated based on an industry standard sound attenuation rate of 6 dB per doubling of distance (from reference distance of 50 feet) for point sources (e.g., construction equipment). Within the analysis, all construction equipment was assumed to operate simultaneously with an estimated usage factor (FHWA, 2006) at the construction area nearest to potentially affected noise sensitive receptors (at the fence line), because equipment used on construction sites usually operates intermittently over the course of a construction day. These assumptions represent a worst-case noise scenario as all construction equipment used in a given phase would not typically operate concurrently and at full power, and the location of activities is routinely spread across the construction site, rather than concentrated close to the nearest noise-sensitive receptors. In addition, noise from different construction stages that could occur simultaneously were added together to provide a conservative, composite construction noise level.

As discussed in Chapter 2, *Project Description*, Project construction could occur in either of two alternate phasing plans: Phasing Plan A or Plan B. Both Phasing Plan A and Plan B provide similar type and intensity of land development, but Plan A and Plan B would be constructed with different construction schedules. However, the noise modeling resulted in the same hourly average and maximum construction noise levels under either Phasing Plan A or Plan B at the off-site receptors.

A summary of the hourly average construction noise levels under either Phasing Plan A or Plan B at the representative ambient noise locations is provided in **Table 4.13-8**, *Estimate of Hourly Average Project Construction Noise Levels (L_{eq}) at Representative Ambient Noise Locations*. Detailed noise calculations for construction activities are provided in Appendix J of this EIR.

As shown in Table 4.13-8, Project construction hourly average noise levels would not exceed the significance thresholds (the measured ambient noise levels, plus 20 dBA) at off-site noise-sensitive receptors, before 10 a.m. or after 3 p.m. under Plan A or Plan B. Therefore, the impact would be less than significant.

A summary of the maximum construction noise impacts under either Plan A or Plan B at the representative ambient noise locations is provided in **Table 4.13-9**, *Estimate of Maximum Project Construction Noise Levels (L_{max}) at Representative Ambient Noise Locations*. Detailed noise calculations for construction activities are provided in Appendix J of this EIR.

As shown in Table 4.13-9, Project construction maximum noise levels would not exceed the significance threshold (the measured ambient noise levels, plus 40 dBA), at the representative ambient noise locations, before 10 a.m. or after 3 p.m. under Phasing Plan A or Plan B. Therefore, the impact would be less than significant.

TABLE 4.13-8
ESTIMATE OF HOURLY AVERAGE PROJECT CONSTRUCTION NOISE LEVELS AT REPRESENTATIVE AMBIENT NOISE LOCATIONS

Representative Ambient Noise Locations	Significance Threshold (dBA L_{eq})[a]	Phasing Plan A or Phasing Plan B[b] Construction Noise Levels (dBA L_{eq}) by Phases					
		Demolition	Grading/Excavation	Foundation/Concrete Pour	Building Construction	Paving	Architectural Coating
R1	89	78	80	76	75	75	75
R2	90	68	71	66	64	64	64
R3	90	64	67	62	59	60	59
R4	88	59	62	57	55	55	55
R5	94	65	68	63	61	61	61
R6	87	81	83	79	79	78	79
R7	90	56	59	54	51	52	51
R8	83	56	59	54	52	52	52
R9	88 [c]	84	85	82	80	79	79

a The significance threshold is the daytime residential zone noise levels in SMMC presented in Table 4.13-3 (60 dBA Leq) or the existing ambient noise levels presented in table 4.13-1 (whichever is higher), plus 20 dBA. In this case, the existing measured ambient is higher; therefore, the threshold is the latter.

b Construction noise levels provided are the same under Plan A or Plan B.

c Ambient measurement not conducted at R9 location; the R9 ambient noise level estimated to be similar to nearby R4 measurement of 68 dBA based on similar ambient noise sources (similar street segments with similar traffic volumes).

SOURCE: ESA, 2019.

Construction noise levels would temporarily or periodically increase in ambient noise levels on the Project site and surrounding land uses including noise sensitive receptors. Although the City's Noise Ordinance exempts increases of noise during construction activities of up to 20 dBA Leq and 40 dBA Lmax, depending on the timing of the high-noise-generating activities, the potential for a substantial periodic impact is based on a perceived increase by the receptor. However, Project construction activities would generally only occur during the allowable construction hours during the daytime as designated in the SMMC, and therefore, would not occur during recognized traditional hours of sleep or on Sundays and federal holidays. As such, while ambient noise levels would temporarily or periodically increase at receptors when construction activities are occurring during the daytime allowable hours, construction noise would be in compliance with the SMMC noise restrictions. Therefore, the impact would be less than significant.

TABLE 4.13-9
ESTIMATE OF MAXIMUM PROJECT CONSTRUCTION NOISE LEVELS AT REPRESENTATIVE AMBIENT NOISE LOCATIONS

Representative Ambient Noise Locations	Significance Threshold (dBA L_{max})[a]	Phasing Plan A or Phasing Plan B [b] Construction Noise Levels (dBA L_{max}) by Phases					
		Demolition	Grading/Excavation	Foundation/Concrete Pour	Building Construction	Paving	Architectural Coating
R1	109	77	84	74	76	81	76
R2	110	68	75	64	63	70	63
R3	110	64	71	60	58	66	58
R4	108	63	67	56	54	62	54
R5	114	66	73	62	60	68	60
R6	107	80	86	77	80	84	80
R7	110	57	64	53	50	58	50
R8	103	56	63	52	51	59	51
R9	108 [c]	85	89	81	81	84	81

a The significance threshold is the daytime residential zone noise levels in SMMC presented in Table 4.13-3 (60 dBA Leq), or the existing ambient noise levels presented in table 4.13-1 (whichever is higher), plus 40 dBA. In this case, the existing measured ambient is higher; therefore, the threshold is the latter.

b Construction noise levels provided are the same under Phasing Plans A or B.

c Ambient measurement not conducted at R9 location; R9 ambient estimated to be similar to nearby R4 measurement of 68 dBA based on similar ambient noise source (similar street segments with similar traffic volumes).

SOURCE: ESA, 2019.

Off-Site Construction Activity

During the Project construction period, workers would commute to the Project Site, and heavy haul trucks would make daily trips to and from the Project Site. A total of approximately 40 worker trips and 6 vendor trips are assumed to commute during a peak hour to the Project Site. In addition, approximately 46 haul trucks are assumed during a peak hour to each Project Site. The access route to the Project Site is assumed to be via Santa Monica Boulevard and Cloverfield Boulevard. **Table 4.13-10**, *Construction-Related Traffic Noise Increase*, presents the traffic noise level increase due to the construction traffic.

As indicated in Table 4.13-10, Project construction traffic noise levels would not increase existing traffic noise levels by 5 dBA CNEL or greater at adjacent land uses. Therefore, impacts would be less than significant.

TABLE 4.13-10
CONSTRUCTION-RELATED TRAFFIC NOISE INCREASE

		Noise Levels (dBA CNEL)			
Roadway Segment	**Adjacent Land Use**	**Existing**	**Construction Trucks/Workers**	**Existing Plus Project Composite Noise Level**	**Increase over Existing (Composite minus Existing)**
Santa Monica Boulevard					
Between 20th Street and West Driveway	Hospital/Commercial	66.8	64.3	68.7	+1.9
Between East Drive Way and 23rd Street	Hospital	70.4	64.3	71.4	+1.0
Between 23rd Street and Cloverfield Boulevard	Commercial	70.8	64.3	71.7	+0.9
Cloverfield Boulevard					
Between Santa Monica Blvd and Broadway	Residential/Commercial	68.8	65.9	70.6	+1.8
Between Broadway and Colorado Avenue	Commercial	69.6	64.8	70.8	+1.2
Between Colorado Avenue and Olympic Boulevard	Commercial	70.0	63.5	70.9	+0.9
Between Olympic Boulevard and Michigan Avenue	Commercial	71.8	64.3	72.5	+0.7

SOURCE: ESA, 2019.

Operational Impacts

On-Site Operations

Mechanical Equipment

The typical mechanical equipment installed for the Phase II buildings would include HVAC, fans, emergency generators, and related equipment, which generate audible noise levels at the source. Some of the proposed mechanical equipment, including air conditioning condensers, would be installed on the building rooftop, with other equipment contained within the new buildings, including the subterranean garages. The Project's HVAC units would either be mini-split systems or conventional system mounted on the roof. However, in accordance with Section 9.21.140 of the SMMC, all exterior mechanical equipment would be screened. Furthermore, as established in Section 4.12.130 of the SMMC, exterior equipment would be designed with appropriate noise control devices, such as sound attenuators, acoustic louvers, or sound screens/parapet walls to comply with the noise limitation requirements as established in Section 4.12.060 of the SMMC.

As described in SMMC Section 4.12.060, the daytime and nighttime exterior noise level limit is 60 dBA and 50 dBA, respectively, at the source, which would further attenuate by distance and with any intervening structure to the nearest receptor. Therefore, for the worst-case noise scenario, it is assumed that the stationary mechanical equipment noise would be up to 60 dBA L_{eq} at the nearest

(adjacent) noise sensitive receptors. **Table 4.13-11**, *Project Noise Increase Due to Stationary Mechanical Equipment*, estimates the increase of daytime noise levels at representative ambient noise locations from stationary mechanical equipment that would generate up to 60 dBA L_{eq} worst-case.

TABLE 4.13-11
PROJECT NOISE INCREASE DUE TO FIXED MECHANICAL EQUIPMENT

Representative Ambient Noise Locations [a]	Existing Daytime Noise Levels (dBA L_{eq})[b]	Stationary Noise Source Daytime Noise Limit (dBA L_{eq})	Existing + Project Stationary Noise Limit (dBA L_{eq})[c]	Increase Over Existing (dBA)[d]
R1	68.7	60	69.2	+0.5
R2	70.5	60	70.9	+0.4
R3	69.8	60	70.2	+0.4
R4	68.0	60	68.6	+0.6
R5	73.8	60	74.0	+0.2
R6	67.2	60	68.0	+0.8
R7	69.7	60	70.1	+0.4
R8	63.1	60	64.8	+1.7
R9	68.0 [e]	60	68.6	+0.6

a See Figure 4.13-2 for locations.
b Existing daytime noise levels from Table 4.13-1.
c Logarithmic summation of existing daytime noise levels and Project Stationary Noise Source (Daytime Noise Limit).
d Increase = (Existing Daytime Noise level + Project Stationary Noise Limit) – Existing Noise Level.
e Ambient measurement not conducted at R9 location; R9 ambient estimated to be similar to nearby R4 measurement based on similar ambient noise source (similar street segments with similar traffic volumes).

SOURCE: ESA, 2019.

As shown in Table 4.13-11, the daytime operation of the Project's exterior stationary mechanical equipment would not increase existing daytime noise levels by greater than 5 dBA Leq at the representative ambient noise locations. Therefore, impacts would be less than significant.

Open Space

The Project would create new open space areas on Sites S2, S1, SI, S4, S5, and 2D/E. The S2 open space would be landscaped to provide areas for passive recreation including for picnicking, seating/reading, and dog walking. The S4 open space, Saint John's Square, would be a 16,500-square foot (110 feet by 150 feet) space between the S3 and S4 buildings along Santa Monica Boulevard, which would encourage active uses including areas complementing the ground floor commercial uses located in S3, S4, and Saint John's Café such as outdoor dining, outdoor classes, and provide sufficient space for special events such as health fairs.

The S5 open space would be the Sun Garden and the South Garden. The Sun Garden (135 feet by 90 feet) would be located between the new Phase II Project buildings and the existing multifamily residential building at 1440 23rd Street and the existing residential buildings located to the west.

The South Garden (50 feet by 145 feet) would be located in front of the existing Geneva Plaza senior housing building. Both S5 open spaces would have more passive recreation opportunities, including tables to eat outdoors, read, and areas for strolling, as well as, exercise stations.

Under a conservative scenario, there could be up to approximately 50 visitors to the common open space areas at one time on a peak weekend day. Noise from human conversation is approximately 55 dBA at a distance of 3 feet. [1] Assuming 25 visitors talking simultaneously, the continuous noise level would be up to approximately 69 dBA at 3 feet. Based on a noise level source strength of 69 dBA at a reference distance of 3 feet, the noise level at 50 feet would be approximately 45 dBA, which would be less than existing noise. As such, the noise levels would not increase more than 5 dBA over the existing noise levels. Therefore, noise impacts associated with the use of common outdoor open spaces would be less than significant.

Other Noise Sources

Other noise sources would include parking activities and loading docks due to the Project operation. The parking areas and loading docks would be located underground and would be enclosed. Therefore, noise levels from parking and loading activities would not increase 5 dBA over the existing noise level. Therefore, impacts would be less than significant.

Off-Site Operations (Traffic)

Project traffic noise impacts on area roadway were assessed for the Approval Year (2019) and the Future Year (2042). Future Year 2041 represents the buildout year of the entire Phase II Master Plan, when Project traffic volumes, and potential traffic noise impacts, would be greatest.

Project Traffic – Existing

Table 4.13-12, *Existing Project Operational Noise Increase Due to Traffic*, compares the existing (2019) traffic noise levels with the existing (2019) noise levels with the Project at full buildout, and identifies the increase in traffic noise levels at the closest noise sensitive receptors along each roadway segment. Traffic volumes and other information are included in Appendix L of this EIR.

As indicated in Table 4.13-12, none of the Project roadway segments would experience an increase of noise levels greater than 3 dBA CNEL for areas categorized as “normally incompatible” or clearly incompatible” in Table 4.13-5 (e.g., residential is 70-75 dBA CNEL or 75-80 dBA CNEL), or 5 dBA CNEL for areas categorized as “clearly compatible” or “compatible with mitigation” in Table 4.13-5 (e.g., residential is less than 60 dBA CNEL or 60 -70 dBA CNEL). Therefore, impacts would be less than significant.

[1] American Journal of Audiology Vol.7 21-25 October 1998. doi:10.1044/1059-0889(1998/012)

TABLE 4.13-12
EXISTING PROJECT OPERATIONAL NOISE INCREASE DUE TO TRAFFIC

Roadway Segment	Adjacent Land Use	Existing	Approval Year With Project	Increase over Existing
20th Street				
Between Montana Avenue and Wilshire Boulevard	Residential	64.8	65.5	+0.7
Between Wilshire Boulevard and Arizona Avenue	Residential/Commercial	69.2	69.2	0.0
Between Arizona Avenue and Santa Monica Boulevard	Residential/Commercial	70.6	70.9	+0.3
Between Santa Monica Boulevard and Broadway	Residential/Commercial	70.0	70.3	+0.3
Between Broadway and Colorado Avenue	Religious/Commercial	71.1	71.6	+0.5
Between Colorado Avenue and Olympic Boulevard	Residential/Commercial	69.7	69.8	+0.1
Between Olympic Boulevard and I-10 EB Off-Ramp	Commercial	72.1	72.5	+0.4
Between I-10 EB Off-Ramp and Delaware Avenue	Residential/Commercial	69.3	69.8	+0.5
Between Delaware Avenue and Pico Boulevard	Residential/Commercial	69.2	69.6	+0.4
21st Street				
Between Santa Monica Boulevard and Broadway	Residential/Hospital	48.7	52.4	+3.7
23rd Street				
Between Wilshire Boulevard and Arizona Avenue	Residential/Commercial	63.3	64.3	+1.0
Between Arizona Avenue and Santa Monica Boulevard	Residential/Hospital	64.2	65.2	+1.0
Between Santa Monica Boulevard and Broadway	Residential/Hospital	58.2	59.1	+0.9
Between Pico Boulevard and Ocean Park Boulevard	Residential	65.0	65.4	+0.4
Cloverfield Boulevard				
Between Santa Monica Boulevard and Broadway	Residential/Commercial	68.8	69.6	+0.8
Between Broadway and Colorado Avenue	Commercial	69.6	69.9	+0.3
Between Colorado Avenue and Olympic Boulevard	Commercial	70.0	70.0	0.0
Between Olympic Boulevard and Michigan Avenue	Commercial	71.8	71.8	0.0
Between I-10 EB On-Ramp and Virginia Avenue	Residential	69.1	69.4	+0.3

Roadway Segment	Adjacent Land Use	Existing	Approval Year With Project	Increase over Existing
Between Virginia Avenue and Pico Boulevard	Residential	70.0	70.0	0.0
Between Pico Boulevard and Ocean Park Boulevard	Residential	64.4	64.4	0.0
26th Street				
Between San Vicente Boulevard and Montana Avenue	Residential/Commercial	67.7	67.8	+0.1
Between Montana Avenue and Wilshire Boulevard	Residential/Commercial	67.8	68.0	+0.2
Between Wilshire Boulevard and Arizona Avenue	Residential/Commercial	68.0	68.3	+0.3
Between Arizona Avenue and Santa Monica Boulevard	Residential/Commercial	68.2	68.5	+0.3
Between Santa Monica Boulevard and Broadway	Residential/Commercial	67.8	68.1	+0.3
Between Broadway and Colorado Avenue	Park/Commercial	68.0	68.3	+0.3
Between Colorado Avenue and Olympic Boulevard	Commercial	68.1	69.4	+1.3
Centinela Avenue				
Between Wilshire Boulevard and Santa Monica Boulevard	Residential/Commercial	64.4	64.6	+0.2
Between Santa Monica Boulevard and Broadway	Residential/Commercial	65.7	66.3	+0.6
Between Broadway and Olympic Boulevard	Residential	67.5	67.8	+0.3
Between Olympic Boulevard and I-10 WB Ramp	Residential/Commercial	68.2	68.2	0.0
Bundy Drive				
Between Wilshire Boulevard and Texas Avenue	Residential/Commercial	70.1	70.3	+0.2
Between Texas Avenue and Santa Monica Boulevard	Residential/Commercial	70.5	70.9	+0.4
Between Santa Monica Boulevard and Ohio Avenue	Commercial	70.8	70.8	0.0
Between Ohio Avenue and Olympic Boulevard	Residential/Commercial	71.7	71.8	+0.1
Broadway				
Between Lincoln Boulevard and 14th Street	Residential/Commercial	67.3	67.6	+0.3
Between 14th Street and 17th Street	Residential/Commercial	68.0	68.4	+0.4
Between 17th Street and 20th Street	Residential/Commercial	68.1	68.7	+0.6

Roadway Segment	Adjacent Land Use	Existing	Approval Year With Project	Increase over Existing
Between 20th Street and 20th Place	Commercial	65.2	65.5	+0.3
Between 20th Place and 21st Street	Commercial	65.4	65.3	-0.1
Between 21st Street and Southeast Driveway	Residential/Commercial	65.4	65.3	-0.1
Between Southeast Driveway and 23rd Street	Residential/Commercial	65.1	65.2	+0.1
Between 23rd Street and Cloverfield Boulevard	Residential/Commercial	68.4	68.4	0.0
Between Cloverfield Boulevard and 26th Street	Residential/Commercial	67.0	67.2	+0.2
Between 26th Street and Centinela Avenue	Residential	66.0	66.5	+0.5
Santa Monica Boulevard				
Between 14th Street and 17th Street	Commercial	69.2	69.1	-0.1
Between 17th Street and 20th Street	Commercial	69.6	69.8	+0.2
Between 20th Street and West Driveway	Hospital/Commercial	66.8	67.3	+0.5
Between East Driveway and 23rd Street	Hospital	70.4	68.5	-0.9
Between 23rd Street and Cloverfield Boulevard	Commercial	70.8	71.6	+0.8
Between Cloverfield Boulevard and 26th Street	Commercial	69.9	70.2	+0.3
Between 26th Street and Yale Street	Residential/Lodging/Commercial	70.0	70.1	+0.1
Between Yale Street and Centinela Avenue	Lodging/Commercial	70.4	70.4	0.0
Wilshire Boulevard	Commercial			
Between 14th Street and 17th Street	Commercial	69.9	70.4	+0.5
Between 17th Street and 20th Street	Commercial	70.0	70.4	+0.4
Between 20th Street and 23rd Street	Religious/School/Commercial	70.2	70.7	+0.5
Between 23rd Street and 26th Street	Park/Commercial	70.1	70.7	+0.6
Between 26th Street and Yale Street	Commercial	70.5	70.8	+0.3
Between Yale Street and Berkeley Street	Commercial	70.6	70.8	+0.3
Arizona Avenue				

Roadway Segment	Adjacent Land Use	Existing	Approval Year With Project	Increase over Existing
Between 14th Street and 17th Street	Hospital/Residential	64.1	64.7	+0.6
Between 17th Street and 20th Street	Residential/Commercial	64.3	64.6	+0.3
Between 20th Street and 21st Street	Lodging/Hospital/Commercial	64.9	65.2	+0.3
Between 21st Street and 22nd Street	Residential/Commercial	65.5	66.0	+0.5
Between 22nd Street and 23rd Street	Residential/Commercial	65.4	65.9	+0.5
Between 23rd Street and 26th Street	Residential/School	64.4	64.6	+0.2
Colorado Avenue				
Between Lincoln Boulevard and 20th Street	Religious/Commercial	64.4	66.2	+1.8
Between 20th Street and Cloverfield Boulevard	Religious/School /Residential/Commercial	68.0	68.5	+0.5
Between Cloverfield Boulevard and 26th Street	Commercial	67.6	67.5	-0.1

SOURCE: ESA, 2019.

Project Traffic – Future

Table 4.13-13, *Future Project Operational Noise Increase Due to Traffic*, compares the future (2042) noise levels with the future (2042) noise levels with the Project, and identifies the future (2042) noise level increase due to the Project at the closest noise sensitive receptors along each roadway segment. Traffic volumes and other information are included in Appendix L of this EIR.

As indicated in Table 4.13-13, the highest traffic noise level increase on area roadways was 1.0 dBA CNEL; therefore, Project traffic noise on roadway segments would not increase noise levels greater than 3 dBA CNEL for areas categorized as “normally incompatible” or clearly incompatible” or 5 dBA CNEL for areas categorized as “clearly compatible” or “compatible with mitigation”. Therefore, impacts would be less than significant.

As the Project future buildout year (2042) traffic volumes would not result in Project traffic noise increases exceeding thresholds, resulting in a less than significant impact, a traffic noise analysis for the Project interim year (2031) was not required. The Project’s interim year (2031) traffic volumes in the Project TIA are less than Project buildout year (2042) traffic volumes (due to less development), and thereby, the interim year traffic noise levels would be less than the future buildout year traffic noise levels, which would result in less of a traffic noise increase without the Project. Therefore, Project traffic noise impacts would also be less than significant in the interim year (2031).

TABLE 4.13-13
FUTURE PROJECT OPERATIONAL NOISE INCREASE DUE TO TRAFFIC

Roadway Segment	Adjacent Land Use	Future	Future Year With Project	Project Increase
20th Street				
Between Montana Avenue and Wilshire Boulevard	Residential	65.2	65.5	+0.3
Between Wilshire Boulevard and Arizona Avenue	Residential/Commercial	68.9	69.1	+0.2
Between Arizona Avenue and Santa Monica Boulevard	Residential/Commercial	69.8	70.0	+0.2
Between Santa Monica Boulevard and Broadway	Residential/Commercial	69.5	69.7	+0.2
Between Broadway and Colorado Avenue	Religious/Commercial	71.5	71.8	+0.3
Between Colorado Avenue and Olympic Boulevard	Residential/Commercial	69.6	69.8	+0.2
Between Olympic Boulevard and I-10 EB Off-Ramp	Commercial	72.7	72.9	+0.2
Between I-10 EB Off-Ramp and Delaware Avenue	Residential/Commercial	69.1	69.2	+0.1
Between Delaware Avenue and Pico Boulevard	Residential/Commercial	69.1	69.2	+0.1
21st Street				
Between Santa Monica Boulevard and Broadway	Residential/Hospital	52.1	52.4	+0.3
23rd Street				
Between Wilshire Boulevard and Arizona Avenue	Residential/Commercial	63.5	64.2	+0.7
Between Arizona Avenue and Santa Monica Boulevard	Residential/Hospital	63.8	64.7	+0.9
Between Santa Monica Boulevard and Broadway	Residential/Hospital	58.2	58.5	+0.3
Between Pico Boulevard and Ocean Park Boulevard	Residential	65.4	65.4	0.0
Cloverfield Boulevard				
Between Santa Monica Boulevard and Broadway	Residential/Commercial	68.8	69.6	+0.8
Between Broadway and Colorado Avenue	Commercial	69.5	69.9	+0.4
Between Colorado Avenue and Olympic Boulevard	Commercial	70.0	70.1	+0.1
Between Olympic Boulevard and Michigan Avenue	Commercial	71.5	71.6	+0.1
Between I-10 EB On-Ramp and Virginia Avenue	Residential	69.1	69.2	+0.1

Roadway Segment	Adjacent Land Use	Future	Future Year With Project	Project Increase
Between Virginia Avenue and Pico Boulevard	Residential	69.9	70.0	+0.1
Between Pico Boulevard and Ocean Park Boulevard	Residential	63.9	64.0	+0.1
26th Street				
Between San Vicente Boulevard and Montana Avenue	Residential/Commercial	67.7	67.8	+0.1
Between Montana Avenue and Wilshire Boulevard	Residential/Commercial	67.8	68.0	+0.2
Between Wilshire Boulevard and Arizona Avenue	Residential/Commercial	68.1	68.2	+0.1
Between Arizona Avenue and Santa Monica Boulevard	Residential/Commercial	68.4	68.5	+0.1
Between Santa Monica Boulevard and Broadway	Residential/Commercial	68.3	68.3	0.0
Between Broadway and Colorado Avenue	Park/Commercial	68.5	68.5	0.0
Between Colorado Avenue and Olympic Boulevard	Commercial	69.3	69.3	0.0
Centinela Avenue				
Between Wilshire Boulevard and Santa Monica Boulevard	Residential/Commercial	64.5	64.5	0.0
Between Santa Monica Boulevard and Broadway	Residential/Commercial	66.1	66.4	+0.3
Between Broadway and Olympic Boulevard	Residential	67.6	67.8	+0.2
Between Olympic Boulevard and I-10 WB Ramp	Residential/Commercial	68.2	68.3	+0.1
Bundy Drive				
Between Wilshire Boulevard and Texas Avenue	Residential/Commercial	70.2	70.3	+0.1
Between Texas Avenue and Santa Monica Boulevard	Residential/Commercial	70.9	71.0	+0.1
Between Santa Monica Boulevard and Ohio Avenue	Commercial	71.1	71.2	+0.1
Between Ohio Avenue and Olympic Boulevard	Residential/Commercial	72.2	72.2	0.0
Broadway				
Between Lincoln Boulevard and 14th Street	Residential/Commercial	67.5	67.5	0.0
Between 14th Street and 17th Street	Residential/Commercial	68.0	68.2	+0.2
Between 17th Street and 20th Street	Residential/Commercial	68.4	68.5	+0.1

Roadway Segment	Adjacent Land Use	Future	Future Year With Project	Project Increase
Between 20th Street and 20th Place	Commercial	66.2	66.3	+0.1
Between 20th Place and 21st Street	Commercial	65.5	65.4	-0.1
Between 21st Street and Southeast Driveway	Residential/Commercial	66.0	65.9	-0.1
Between Southeast Driveway and 23rd Street	Residential/Commercial	66.2	66.3	+0.1
Between 23rd Street and Cloverfield Boulevard	Residential/Commercial	69.5	69.4	-0.1
Between Cloverfield Boulevard and 26th Street	Residential/Commercial	67.1	67.3	+0.2
Between 26th Street and Centinela Avenue	Residential	66.3	66.5	+0.2
Santa Monica Boulevard				
Between 14th Street and 17th Street	Commercial	69.1	69.2	+0.1
Between 17th Street and 20th Street	Commercial	69.5	69.7	+0.2
Between 20th Street and West Driveway	Hospital/Commercial	66.5	66.9	+0.4
Between East Driveway and 23rd Street	Hospital	68.0	69.0	+1.0
Between 23rd Street and Cloverfield Boulevard	Commercial	71.2	71.9	+0.7
Between Cloverfield Boulevard and 26th Street	Commercial	69.9	70.3	+0.4
Between 26th Street and Yale Street	Residential/Lodging/Commercial	70.1	70.4	+0.3
Between Yale Street and Centinela Avenue	Lodging/Commercial	70.2	70.6	+0.4
Wilshire Boulevard	Commercial			
Between 14th Street and 17th Street	Commercial	70.5	70.5	0.0
Between 17th Street and 20th Street	Commercial	70.5	70.5	0.0
Between 20th Street and 23rd Street	Religious/School/Commercial	70.8	70.8	0.0
Between 23rd Street and 26th Street	Park/Commercial	70.8	70.9	+0.1
Between 26th Street and Yale Street	Commercial	71.0	71.1	+0.1
Between Yale Street and Berkeley Street	Commercial	70.9	71.0	+0.1

Roadway Segment	Adjacent Land Use	Future	Future Year With Project	Project Increase
Arizona Avenue				
Between 14th Street and 17th Street	Hospital/Residential	64.0	64.2	+0.2
Between 17th Street and 20th Street	Residential/Commercial	65.0	65.2	+0.2
Between 20th Street and 21st Street	Lodging/Hospital/Commercial	66.3	66.6	+0.3
Between 21st Street and 22nd Street	Residential/Commercial	66.0	66.3	+0.3
Between 22nd Street and 23rd Street	Residential/Commercial	65.6	66.0	+0.4
Between 23rd Street and 26th Street	Residential/School	65.4	65.5	+0.1
Colorado Avenue				
Between Lincoln Boulevard and 20th Street	Religious/Commercial	66.7	66.7	0.0
Between 20th Street and Cloverfield Boulevard	Religious/School /Residential/Commercial	69.2	69.2	0.0
Between Cloverfield Boulevard and 26th Street	Commercial	67.6	67.7	+0.1

[a] Clearly Compatible: Land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

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

[b] Calculated based on existing traffic volumes.

SOURCE: ESA, 2019.

Composite Noise Level Impacts from Project Operations

Noise sources associated with the Project Site would include vehicle traffic on nearby roadways, on-site mechanical equipment, parking-related noise, and open spaces. The combined noise from the Project's various noise sources (i.e., composite noise level) would conservatively ascertain the potential maximum Project-related noise level increase that may occur at the noise sensitive receptor locations included in this analysis. However, because traffic noise levels would be the dominant noise source from Project operations, the assessment described for the traffic noise levels would represent the composite Project operational noise level.

With regard to noise from ambulance sirens, such noise occurs occasionally in the Project area during emergency transport of patients to PSJHC's emergency room at the main hospital building. Development of the Project would not increase the size or operational capacity of the emergency room such that there would be an increase in noise from ambulance sirens.

Vibration Levels

Impact NOISE-2: *Would the project generate excessive groundborne vibration or groundborne noise levels?*

Impact Statement NOISE-2: Construction activities from the Project could result in excessive vibration levels, potentially resulting in structural damage impacts and impacts to vibration sensitive medical uses. After the implementation of Mitigation Measure NOISE-1, potential structural damage impacts would be less than significant; however, after the implementation of Mitigation Measure NOISE-2, potential impacts to vibration sensitive medical uses would be significant and unavoidable at nearby non-PSJHC owned medical office facilities. With respect to human annoyance, construction activities adjacent to or near inhabited structures would not result in excessive vibration levels, resulting in a less than significant impact. Operational activities would not result in excessive vibration levels to structures, vibration sensitive medical uses, or human annoyance, resulting in a less than significant impact.

Construction

Receivers that can be adversely affected by groundborne vibration include structures, people, and equipment (such as vibration sensitive medical equipment).

Structures

During construction, ground-borne vibration would be generated from the operation of heavy construction equipment at the Project Site, which could potentially expose existing sensitive land uses surrounding the sites to excessive vibration. The duration and amplitude of vibration generated by construction equipment varies widely depending on the type of equipment and the purpose for which it is being used. The vibration levels of general construction equipment that would operate during Project construction are identified in **Table 4.13-14**, *Vibration Source Levels for Construction Equipment*, and range from 0.003 to 0.210 in/sec PPV at 25 feet from the source of activity (impact activities, such as pile driving, are assumed not be used for this Project). Therefore, vibration velocities could reach as high as approximately 0.210 in/sec PPV at 25 feet from the source (i.e., from a vibratory roller), depending on the type of construction equipment in use.

TABLE 4.13-14
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	Approximate PPV (in/sec) at 25 feet
Vibratory Roller	0.210
Large Bulldozer	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozer	0.003

SOURCE: Caltrans, 2013.

Construction activities associated with the Project Site would have the potential to impact the surrounding off-site structures, which are considered as modern commercial and residential buildings, based on Caltrans structure and use categories in Table 4.13-3. According to the Caltrans vibration structural damage criteria in Table 4.13-3, the vibration structural damage impact criteria for modern commercial and residential buildings is 0.3 in/sec PPV. **Table 4.13-15**, *Minimum Distances to Not Exceed Structure Damage Criteria*, shows the minimum distances at which the Project construction equipment could operate from a building to not exceed the Caltrans 0.3 in/sec PPV structural damage criteria for modern commercial and residential buildings.

TABLE 4.13-15
MINIMUM DISTANCES NOT EXCEEDING STRUCTURE DAMAGE VIBRATION CRITERIA

Equipment	Distance (feet) to 0.3 in/sec PPV
Vibratory Roller	20
Large Bulldozer	12
Loaded Trucks	11
Jackhammer	6
Small Bulldozer	2

SOURCE: Caltrans, 2013; ESA, 2019.

As indicated in Table 4.13-15, when specific equipment is operating closer to buildings than the respective distances shown, vibration levels would exceed the Caltrans structural damage criteria of 0.3 in/sec PPV. For example, as shown in Table 4.13-15, the vibratory roller generates the highest level of vibration from the Project equipment list, exceeding the Caltrans structural damage criteria of 0.3 in/sec PPV when in operation less than 20 feet from a structure.

For Project construction, parking access roads are proposed to the north of Site 2C, which according to the Project site plan, would be approximately 80 feet from the Health Center building. Construction of the access roads would include grading by bulldozer and vibratory roller for compaction prior to paving activities. Therefore, at 80 feet, the operation of the roller or bulldozer would not exceed the Caltrans structural damage criteria of 0.3 in/sec PPV at the Health Center building.

There are existing structures at 20 feet from Project construction: multi-family residential buildings north of Site S2, Site S4, and Site S5, multi-family residential southeast of Site S5, and a medical office building southeast of Site 2I, and the St. John's Medical Office north of Site 2l. However, the construction activity at these locations are not anticipated to include the use of a vibratory roller; therefore, construction activities at or 20 feet would not exceed the Caltrans structural damage criteria of 0.3 in/sec PPV at these buildings.

The nearest off-Campus structures are located approximately 55 feet from the Project Site. Therefore, at 55 feet, the operation of the roller or bulldozer would not exceed the Caltrans structural damage criteria of 0.3 in/sec PPV.

However, Project construction (i.e., vibratory roller) could be required to operate within 20 feet of a building, with vibration levels potentially exceeding the criteria of 0.3 in/sec PPV, potentially result in a significant impact.

In addition, the use of the Caltrans structural damage vibration criteria of 0.3 in/sec PPV is based on the structures being categorized as "modern commercial and residential buildings" from in Table 4.13-3, structure and use categories. The structural category of each building potentially impacted structurally is unknown. Therefore, the buildings potentially affected could be more or less fragile than the Caltrans structural damage vibration criteria of 0.3 in/sec PPV. To reduce potential structural damage vibration impacts, Mitigation Measure NOISE-1 is prescribed, as presented below in Section 4.13.5, Mitigation Measures.

Human Annoyance

Section 4.12.070 of the SMMC exempts vibration caused by construction activity from the requirements of Section 4.12.070, i.e., the vibration threshold for human perception of more than 0.05 in/sec RMS velocity established in Section 4.12.070. Therefore, human annoyance vibration impacts during Project construction would be less than significant.

Medical Uses

Medical uses, such as surgical suites/operating rooms, labs, and imagery facilities, are vibration-sensitive. During Project construction, the use of heavy-duty construction equipment could potentially generate vibration adjacent to or near medical buildings that may or may not include vibration sensitive medical uses.

However, the current and future existence of vibration sensitive medical uses within buildings in proximity to Project construction is currently unknown. Therefore, vibration sensitive medical uses could be adversely affected by construction vibration. Mitigation Measure-NOISE-2 addresses the use of vibration-generating construction equipment in proximity to potential vibration sensitive medical equipment in buildings during Project construction.

Operation

The Project's day-to-day operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration at low levels that would not cause structural damage to the on- or off-site buildings, human annoyance, or impacts vibration sensitive medical uses. According to America Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE), pumps or compressor would generate groundborne vibration levels of 0.5 in/sec PPV at a reference distance of 1 foot (ASHRAE 1999), which would dissipate rapidly with distance. In accordance with Section 9.21.140 of the SMMC, all exterior mechanical equipment would be screened. Furthermore, as established in Section 4.12.130 of the SMMC, exterior equipment would be designed with appropriate noise control devices, such as sound attenuators, acoustic louvers, or sound screens/parapet walls to comply with the noise limitation requirements as established in Section 4.12.060 of the SMMC. These requirements would also serve to minimize vibration levels.

Therefore, vibration impacts to structures, human annoyance, and vibration sensitive medical uses would be less than significant.

4.13.4.5 Cumulative Impacts

Construction

The geographic scope for the consideration of cumulative project construction noise impacts are primarily the areas immediately surrounding the Project Site, and to a lesser degree, along designated haul routes, where heavy construction truck vehicles would travel during the construction period of the Project. Generally, noise impacts are limited to the area directly surrounding the noise source, as noise attenuates with distance at a higher rate in proximity to the source, and only has the potential to combine with other noise sources occurring simultaneously in the immediate vicinity.

As indicated in Table 3-1 and Table 3-2, that provide lists of pending, approved, and under construction projects, there are no cumulative projects immediately adjacent to either Project Site that would contribute to cumulative noise or vibration impacts on surrounding development. The nearest notable cumulative project is an approved 6-unit condominium located approximately 300 feet southwest of the Project Site. Cumulative development could increase construction noise and traffic due to construction workers and the use of haul trucks.

Off-site construction noise impacts from the cumulative projects could only combine with the Project's off-site construction noise impacts if the related projects were under construction concurrently with the Project. It is highly unlikely that all of the related projects, or even a substantial number of them, would be under construction at the same time as the Project. Moreover, even if a number of cumulative projects were under construction at the same time as the Project, most would have different haul routes and different travel patterns associated with their construction. The distances from the Project Site and the cumulative projects would ensure construction noise levels would not combine to result in elevated cumulative noise levels.

The Project would implement PDF-NOISE-1 which would reduce and limit on-site construction noise levels, which would in any case be limited to the near vicinity. Other development within the City would also be required to implement appropriate mechanisms for reduction in noise impacts. Haul truck routes for cumulative projects would also require approval by the City's Transportation Management Division. The City's established process would take into consideration overlapping construction projects and would balance haul routes to minimize the impacts of cumulative hauling on any particular roadway.

The Project construction noise was determined not to expose persons to, or generate, noise levels in excess of standards established in the SMMC and not result in a temporary increase in ambient noise levels. Therefore, impacts would be less than significant. Project construction noise would not be at the magnitude to potentially combine with other cumulative projects located within immediate proximity to the Project Site, where the combined noise level would cumulatively, substantially, and temporarily increase the ambient noise environment in the Project area.

Construction impacts are short-term temporary impacts and the potential for cumulative effects arises only when multiple development projects have overlapping days with maximum construction activities. Further, there is limited potential for cumulative noise impacts in the immediate vicinity of the Project and noise management procedures for the Project and cumulative projects would be implemented. Therefore, construction noise impacts would be less than cumulatively significant.

As previously discussed for vibration, construction activities would result in sporadic, temporary vibration effects adjacent to the Project area. Structural and medical use impacts due to vibration from on-site construction activity would be potentially significant, based on the equipment used and proximity to structures and medical use buildings. However, impacts would be less than significant after the implementation of mitigation measures. Due to the rapid attenuation characteristics of ground-borne vibration, and distance separating construction associated with the Project and any other cumulative projects, there is not a likely potential for cumulative vibration impacts. Therefore, cumulative vibration impacts would be less than significant.

Operation

Implementation of the Project would increase noise levels as a result of new operational stationary noise sources and operational mobile sources from new vehicle trips. As the development of cumulative projects in the vicinity of the Project Site is limited, cumulative noise impacts in the immediate vicinity of the Project Site would be limited. The increases in noise level due to the Project's on-site, stationary noise sources are negligible. There are no adjacent cumulative projects that might increase noise and vibration levels due to stationary sources in the vicinity of the Project. Further, to the extent that other development might occur in the City, such development would be subject to City regulations for noise control.

Vehicular trips associated with the Project would generate mobile operational noise. This cumulative analysis first considers whether noise associated with future traffic is an overall cumulative impact. As well, it is considered to what degree the Project would contribute to that cumulative noise impact and if that contribution is cumulative.

The overall potential cumulative impact from long-term mobile operational noise pertains to changes in roadway noise levels that could result from future traffic volumes associated with anticipated regional growth, including that under the Project. Project operational traffic during the future year (2042) would increase noise levels at off-site noise sensitive uses in the Project area, as shown in **Table 4.13-17**, *Cumulative Project Operational Noise Increase Due to Traffic.*

As shown in Table 4.13-17, increases over the existing noise levels due to future (2042) operational traffic would not exceed the established thresholds. Operational traffic-related noise impacts would be less than significant. Therefore, the Project would not result in a cumulatively considerable contribution to roadway noise; and cumulative operational traffic-related noise impacts would be less than significant.

Vibration impacts associated with operation of the Project Site would be below the significance threshold with mitigation measures, and therefore, impacts would be less than significant. Due to the rapid attenuation characteristics of ground-borne vibration, vibration levels similar to ambient

levels, and distance separating development associated with the Project and any other cumulative projects, there is no potential for cumulative vibration impacts. Therefore, cumulative vibration impacts would be less than significant.

TABLE 4.13-17
CUMULATIVE PROJECT OPERATIONAL NOISE INCREASE DUE TO TRAFFIC

Roadway Segment	Adjacent Land Use	Existing	Future Year With Project	Cumulative Increase
20th Street				
Between Montana Avenue and Wilshire Boulevard	Residential	64.8	65.5	+0.7
Between Wilshire Boulevard and Arizona Avenue	Residential/Commercial	69.2	69.1	+0.3
Between Arizona Avenue and Santa Monica Boulevard	Residential/Commercial	70.6	70.0	-0.6
Between Santa Monica Boulevard and Broadway	Residential/Commercial	70.0	69.7	-0.3
Between Broadway and Colorado Avenue	Religious/Commercial	71.1	71.8	+0.7
Between Colorado Avenue and Olympic Boulevard	Residential/Commercial	69.7	69.8	+0.1
Between Olympic Boulevard and I-10 EB Off-Ramp	Commercial	72.1	72.9	+0.8
Between I-10 EB Off-Ramp and Delaware Avenue	Residential/Commercial	69.3	69.2	-0.1
Between Delaware Avenue and Pico Boulevard	Residential/Commercial	69.2	69.2	0.0
21st Street				
Between Santa Monica Boulevard and Broadway	Residential/Hospital	48.7	52.4	+3.7
23rd Street				
Between Wilshire Boulevard and Arizona Avenue	Residential/Commercial	63.3	64.2	+0.9
Between Arizona Avenue and Santa Monica Boulevard	Residential/Hospital	64.2	64.7	+0.5
Between Santa Monica Boulevard and Broadway	Residential/Hospital	58.2	58.5	+0.3
Between Pico Boulevard and Ocean Park Boulevard	Residential	65.0	65.4	+0.4
Cloverfield Boulevard				
Between Santa Monica Boulevard and Broadway	Residential/Commercial	68.8	69.6	+0.8
Between Broadway and Colorado Avenue	Commercial	69.6	69.9	+0.3
Between Colorado Avenue and Olympic Boulevard	Commercial	70.0	70.1	+0.1

Roadway Segment	Adjacent Land Use	Existing	Future Year With Project	Cumulative Increase
Between Olympic Boulevard and Michigan Avenue	Commercial	71.8	71.6	-0.2
Between I-10 EB On-Ramp and Virginia Avenue	Residential	69.1	69.2	+0.1
Between Virginia Avenue and Pico Boulevard	Residential	70.0	70.0	0.0
Between Pico Boulevard and Ocean Park Boulevard	Residential	64.4	64.0	-0.4
26th Street				
Between San Vicente Boulevard and Montana Avenue	Residential/Commercial	67.7	67.8	+0.1
Between Montana Avenue and Wilshire Boulevard	Residential/Commercial	67.8	68.0	+0.2
Between Wilshire Boulevard and Arizona Avenue	Residential/Commercial	68.0	68.2	+0.2
Between Arizona Avenue and Santa Monica Boulevard	Residential/Commercial	68.2	68.5	+0.3
Between Santa Monica Boulevard and Broadway	Residential/Commercial	67.8	68.3	+0.5
Between Broadway and Colorado Avenue	Park/Commercial	68.0	68.5	+0.5
Between Colorado Avenue and Olympic Boulevard	Commercial	68.1	69.3	+1.2
Centinela Avenue				
Between Wilshire Boulevard and Santa Monica Boulevard	Residential/Commercial	64.4	64.5	+0.1
Between Santa Monica Boulevard and Broadway	Residential/Commercial	65.7	66.4	+0.7
Between Broadway and Olympic Boulevard	Residential	67.5	67.8	+0.3
Between Olympic Boulevard and I-10 WB Ramp	Residential/Commercial	68.2	68.3	+0.1
Bundy Drive				
Between Wilshire Boulevard and Texas Avenue	Residential/Commercial	70.1	70.3	+0.2
Between Texas Avenue and Santa Monica Boulevard	Residential/Commercial	70.5	71.0	+0.5
Between Santa Monica Boulevard and Ohio Avenue	Commercial	70.8	71.2	+0.3
Between Ohio Avenue and Olympic Boulevard	Residential/Commercial	71.7	72.2	+0.1
Broadway				
Between Lincoln Boulevard and 14th Street	Residential/Commercial	67.3	67.5	+0.2

Roadway Segment	Adjacent Land Use	Existing	Future Year With Project	Cumulative Increase
Between 14th Street and 17th Street	Residential/Commercial	68.0	68.2	+0.2
Between 17th Street and 20th Street	Residential/Commercial	68.1	68.5	+0.4
Between 20th Street and 20th Place	Commercial	65.2	66.3	+0.1
Between 20th Place and 21st Street	Commercial	65.4	65.4	0.0
Between 21st Street and Southeast Driveway	Residential/Commercial	65.4	65.9	+0.5
Between Southeast Driveway and 23rd Street	Residential/Commercial	65.1	66.3	+0.2
Between 23rd Street and Cloverfield Boulevard	Residential/Commercial	68.4	69.4	+1.0
Between Cloverfield Boulevard and 26th Street	Residential/Commercial	67.0	67.3	+0.3
Between 26th Street and Centinela Avenue	Residential	66.0	66.5	+0.5
Santa Monica Boulevard				
Between 14th Street and 17th Street	Commercial	69.2	69.2	0.0
Between 17th Street and 20th Street	Commercial	69.6	69.7	+0.1
Between 20th Street and West Driveway	Hospital/Commercial	66.8	66.9	+0.1
Between East Driveway and 23rd Street	Hospital	70.4	69.0	-1.4
Between 23rd Street and Cloverfield Boulevard	Commercial	70.8	71.9	+1.1
Between Cloverfield Boulevard and 26th Street	Commercial	69.9	70.3	+0.4
Between 26th Street and Yale Street	Residential/Lodging/Commercial	70.0	70.4	+0.4
Between Yale Street and Centinela Avenue	Lodging/Commercial	70.4	70.6	+0.2
Wilshire Boulevard	Commercial			
Between 14th Street and 17th Street	Commercial	69.9	70.5	+0.6
Between 17th Street and 20th Street	Commercial	70.0	70.5	+0.5
Between 20th Street and 23rd Street	Religious/School/Commercial	70.2	70.8	+0.6
Between 23rd Street and 26th Street	Park/Commercial	70.1	70.9	+0.7
Between 26th Street and Yale Street	Commercial	70.5	71.1	+0.6

Roadway Segment	Adjacent Land Use	Existing	Future Year With Project	Cumulative Increase
Between Yale Street and Berkeley Street	Commercial	70.6	71.0	+0.4
Arizona Avenue				
Between 14th Street and 17th Street	Hospital/Residential	64.1	64.2	+0.1
Between 17th Street and 20th Street	Residential/Commercial	64.3	65.2	+0.9
Between 20th Street and 21st Street	Lodging/Hospital/Commercial	64.9	66.6	+1.7
Between 21st Street and 22nd Street	Residential/Commercial	65.5	66.3	+0.8
Between 22nd Street and 23rd Street	Residential/Commercial	65.4	66.0	+0.6
Between 23rd Street and 26th Street	Residential/School	64.4	65.5	+1.1
Colorado Avenue				
Between Lincoln Boulevard and 20th Street	Religious/Commercial	64.4	66.7	+2.3
Between 20th Street and Cloverfield Boulevard	Religious/School /Residential/Commercial	68.0	69.2	+1.2
Between Cloverfield Boulevard and 26th Street	Commercial	67.6	67.7	+0.1

[a] Clearly Compatible: Land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

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

[b] Calculated based on existing traffic volumes.

SOURCE: ESA, 2019.

4.13.5 Mitigation Measures

4.13.5.1 Construction Noise

Impacts are less than significant. No mitigation measures are required.

4.13.5.2 Construction Vibration

Construction-related vibration has the potential to result in a significant vibration impacts to building structures and medical buildings with vibration sensitive medical uses located adjacent to or near Project construction with the use of heavy construction equipment. Thus, the following mitigation measures Noise-1 and Noise-2 are prescribed to protect nearby vibration sensitive uses from excessive vibration impacts:

MM NOISE-1: To reduce the potential for construction-related vibration effects to building structures, prior to the issuance of a building permit for a Site, PSJHC shall

perform an inventory of the structural condition of buildings within 50 feet of Project construction. Based on the surveyed building's structure and condition, an acoustic specialist will determine the appropriate Caltrans vibration structural damage potential criteria, and for each piece of equipment, assess a standoff distance from the building. The construction contractor(s) shall restrict the use of equipment within the minimum applicable standoff distances to not exceed the building's applicable structural damage criteria. If construction is required within these minimum applicable distances, alternative equipment and methods, such as small bulldozers (less than 300 horsepower), smaller or alternative construction equipment, or alternative methods shall be used to reduce potential vibration levels to less than the building's applicable structural damage criteria.

MM NOISE-2: To reduce the potential for construction-related vibration effects to any vibration sensitive medical uses, prior to the issuance of a building permit for Sites 2C, 2I, 2D/E, S1, S3 and S4, PSJHC shall perform an inventory of vibration-sensitive medical equipment and rooms/suites in the hospital and in the adjacent Medical Office Buildings, as well those along Santa Monica Boulevard and Broadway. PSJHC shall notify both the building owner/property manager and the building's medical office tenants in writing of PSJHC's need to inventory the building/tenant suite for vibration-sensitive medical equipment and rooms/suites with vibration-sensitive medical operations and to conduct the simulation(s).

For the buildings identified to contain vibration sensitive medical uses and where determined to be potentially exposed to adverse vibration effects associated with construction activities by a qualified acoustical specialist, a construction simulation survey shall be undertaken outside of each building, replicating representative construction activities, such as the use of an excavator or the dropping of a heavy weight. The simulations shall be undertaken in an appropriate number of locations, as determined by an acoustical specialist to allow evaluation of the proposed construction activities. Use of the vibration-sensitive equipment will be monitored by the applicable medical team during this exercise.

The applicable medical team will confer with the construction team, including an acoustical specialist, after the simulation. If the simulation results indicate that either (a) construction vibration would exceed manufacturer's specifications for vibration-sensitive medical equipment or (b) hospital operating rooms or critical working areas would exceed the "Weighting factors for satisfactory magnitudes of building vibration with respect to human response" in ANSI/ASA S2.71-1983 (reaffirmed in 2012), Table A.1, then a detailed mitigation plan shall be prepared unless both the applicable medical team and the construction team agree that the construction vibration is not impacting medical equipment/procedures in a particular medical suite despite the manufacturer's specifications or weighting factors. If a mitigation plan is required, the construction team, including an acoustical specialist, shall prepare such plan relevant to such equipment or operations that is practicable for both the construction team and the applicable medical team. This will involve a combination of the judicious selection of construction equipment and techniques to minimize vibration at source, the sympathetic scheduling of the hours of construction and medical equipment usage/operations, the use of

vibration isolation tables for particularly sensitive medical equipment/operations and the possible temporary relocation of affected medical equipment/operations.

PSJHC shall use good faith efforts to secure the voluntary cooperation of the building owner/property manager and the building's medical office tenants in allowing PSJHC to perform the inventory, schedule the simulation(s), monitor the vibration-sensitive medical equipment or operations during the simulation(s), and provide input on practicable measures to include in the mitigation plan.

4.13.6 Level of Significance After Mitigation

4.13.6.1 Construction

Mitigation Measure NOISE-1 would provide adequate vibration reductions for structural damage at on- and off-site buildings, by restricting the distances of heavy vibration-generating equipment from structures to the minimum distances provided by MM NOISE-1, or alternative equipment or methods, to not exceed the applicable structural damage criteria for each building. Thus, potentially significant construction vibration impacts would be reduced to a less than significant level.

Mitigation Measure NOISE-2 would prevent construction vibration impacts to sensitive medical equipment at Medical Office Buildings not owned/controlled by PSJHC and PSJHC medical uses that participate in Mitigation Measure NOISE-2 through location inventory, simulation testing, equipment relocation, equipment isolation, not conducting construction during active use of equipment, or alternative construction methods. Thus, potentially significant construction vibration impacts at participating Medical Office Buildings not owned/controlled by PSJHC would be reduced to a less than significant level. However, for any Medical Office Buildings not owned/controlled by PSJHC that do not participate in Mitigation Measure NOISE-2, Project construction vibration could result in impacts to vibration sensitive medical equipment. Therefore, the impact is conservatively concluded to be significant and unavoidable at these medical office buildings.

4.13.6.2 Operation

No mitigation measures required; impacts would be less than significant.

vibration isolation tables for particularly sensitive medical equipment/operations and the possible temporary relocation of affected medical equipment/operations.

PSJHC shall use good faith efforts to secure the voluntary cooperation of the building owner/property manager and the building's medical office tenants in allowing PSJHC to perform the inventory, schedule the simulation(s), monitor the vibration-sensitive medical equipment or operations during the simulation(s), and provide input on practicable measures to include in the mitigation plan.

4.13.6 Level of Significance After Mitigation

4.13.6.1 Construction

Mitigation Measure NOISE-1 would provide adequate vibration reductions for structural damage at on- and off-site buildings, by restricting the distances of heavy vibration-generating equipment from structures to the minimum distances provided by MM NOISE-1, or alternative equipment or methods, to not exceed the applicable structural damage criteria for each building. Thus, potentially significant construction vibration impacts would be reduced to a less than significant level.

Mitigation Measure NOISE-2 would prevent construction vibration impacts to sensitive medical equipment at Medical Office Buildings not owned/controlled by PSJHC and PSJHC medical uses that participate in Mitigation Measure NOISE-2 through location inventory, simulation testing, equipment relocation, equipment isolation, not conducting construction during active use of equipment, or alternative construction methods. Thus, potentially significant construction vibration impacts at participating Medical Office Buildings not owned/controlled by PSJHC would be reduced to a less than significant level. However, for any Medical Office Buildings not owned/controlled by PSJHC that do not participate in Mitigation Measure NOISE-2, Project construction vibration could result in impacts to vibration sensitive medical equipment. Therefore, the impact is conservatively concluded to be significant and unavoidable at these medical office buildings.

4.13.6.2 Operation

No mitigation measures required; impacts would be less than significant.

4.14 Population and Housing

4.14.1 Introduction

This section analyzes the potential effects of the Project related to population, housing, and employment growth within the City and greater County of Los Angeles. Effects of the Project on the demographic characteristics are compared to adopted and advisory growth forecasts and relevant policies and programs that pertain to future growth. Related information regarding the effects of the new development on the relationship between land uses and potential changes in land use patterns associated with growth is further addressed in Section 4.11, *Land Use and Planning*. The potential growth-inducing impacts of the Projects are further addressed in Chapter 6.0, *Other CEQA Considerations*.

4.14.2 Environmental Setting

4.14.2.1 Site Conditions

As discussed in depth in Chapter 2, *Project Description*, of this EIR, the Project Site is comprised of ten Phase II Development Sites that is part of the greater PSJHC Campus located in the Healthcare Mixed Use District of the City. The Healthcare Mixed Use District includes two major hospitals (PSJHC and SM-UCLA Medical Center) as well as commercial, medical office, office, school, and residential buildings.

The existing land uses at the Project Site include medical buildings (e.g., Child Family Development Center, PSJHC Foundation Building, John Wayne Cancer Institute, two temporary MRI modular buildings), a 10-unit vacant apartment building, Mullin Plaza, and several surface parking lots, for a total of 110,055 sf of existing building floor area. The existing resident population, housing, and employees at the Project Site is estimated in **Table 4.14-1**, *Existing Population, Housing and Employment at the Project Site*. As indicated therein, there are currently no residents (as the 10 multi-family residential units are vacant), and an estimated 177 existing employees at the Project Site.

4.14.2.2 City and Regional Conditions

The U.S. Census Bureau, LUCE, and Southern California Association of Governments (SCAG) provide population, housing, and employment estimates and projections for the City and/or Los Angeles County (e.g., the region). These estimates are described below.

U.S. Census Bureau Data

The U.S. Census Bureau conducts the decennial U.S. Census for the entire U.S. population. Prior to 2010, the 10 year censuses were comprised of the “long-form” surveys which provided detailed demographic characteristics. Since then, the census was revised to be a short-form only census to count all U.S. persons living in the country as name, sex, age, date of birth, race, ethnicity, relationship and housing tenure.

TABLE 4.14-1
EXISTING POPULATION, HOUSING AND EMPLOYMENT AT THE PROJECT SITE

Development Site #	Building Name	Use	Amount (sf/unit)	Population: Generation Rate[a]	Population: Residents	Housing Units	Employment[b]
2C	West Parking Lot	parking	--	--	--	--	--
2I	Child & Family Development Center	daycare, medical office	34,670 sf	--	0	0	36
2D/E	PSJHC Foundation Bldg.	office	10,800 sf	--	0	0	35
	Parking Lot C	parking	--	--	--	--	--
Mullin Plaza	Entry plaza, open space	roadway, open space	--	--	--	--	--
S1/S3	Temporary MRI Bldg.	office	2,675 sf	--	0	0	5
	Parking Lot B	parking	--	--	--	--	--
	Parking Lot I	parking	--	--	--	--	--
S2	Parking Lot H (portion)	parking	--	--	--	--	--
S4 and Saint John's Square	John Wayne Cancer Institute	medical clinics, labs, medical office	51,055 sf	--	0	0	101
	10-unit Apartment Blvd.	residential (vacant)	10 units	1.94/unit	0[c]	10[c]	--
	Parking Lot H (portion)	parking	--	--	--	--	--
S5	Parking Lot H (portion)	parking	--	--	--	--	--
Total			**--**	**--**	**0[c]**	**10[c]**	**177**

Acronyms and Abbreviations: sf = square feet

[a] The average household size reflects the average household size for the City of Santa Monica, based on ACS and SCAG estimates.
[b] Information provided by PSJHC.
[c] The 10 existing on-site multi-family housing units are currently vacant.

SOURCE: ESA 2018.

The more detailed socioeconomic information once collected via the long-form census survey is now collected by the American Community Survey (ACS). The survey provides current data about all communities every year, rather than once every 10 years. It is sent to a small percentage of the population on a rotating basis throughout the decade. The ACS provides more detailed social and economic characteristics of communities, including housing, education, jobs, and more. Since the ACS is conducted every year, rather than every 10 years, it provides more current data throughout the decade.[1]

[1] ACS data are available in 1-year and 5-year estimates. From 2007 to 2013, 3-year estimates were available for areas with 20,000 people or more. This data product was discontinued in 2015 due to budget cuts.

Data for Santa Monica collected by the U.S. Census Bureau is shown in **Table 4.14-2**, *Santa Monica 2010 and 2016 U.S. Census Estimates*. According to the 2010 Census, the City had a total population of 89,736 people in 2010. Of this amount 87,610 people lived in households and 2,126 lived in group quarters. The City also had 50,912 housing units, of which 46,917 were occupied households. The average household size was 1.87 people per household.[2]

TABLE 4.14-2
SANTA MONICA 2010 AND 2016 U.S. CENSUS ESTIMATES

Census Measurement	Population	Housing Units	Households
2010 Decennial Census	89,736[a]	50,912[a]	46,917[a]
2016 ACS	92,247[b]	51,281[b]	46,453[b]

[a] U.S. Census Bureau, 2010 Census, Fact Finder – City of Santa Monica, https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml. Accessed April 18, 2018.

[b] U.S. Census Bureau, American Community Survey – City of Santa Monica 2016, 5-year estimates http://www.dof.ca.gov/Reports/Demographic_Reports/American_Community_Survey/#ACS2016x1. Accessed April 19, 2018.

SOURCE: ESA 2018. Based on data from U.S. Census Bureau.

According to the most recently available ACS, which is based on the 2012-2016 5-year rolling average estimates, the City had a population of 92,247 with 51,281 housing units of which 46,453 were occupied households. Assuming that the population in group quarters is the same as reported in the 2010 Census (2,126 people), the number of people residing in occupied households in the City for 2016 was estimated to be 90,121, and the average household size was 1.94.[3]

SGAG Data

SCAG is the federally designated metropolitan planning organization (MPO) for the Southern California region, which covers six counties: Los Angeles, Orange, Riverside, San Bernardino, Imperial, and Ventura. Santa Monica is located in Los Angeles County within the Westside Cities Subregion, which includes the cities of Beverly Hills, Culver City, Santa Monica, West Hollywood, and some adjacent unincorporated areas. SCAG develops socioeconomic estimates and growth projections including population, households, and employment for cities in the SCAG region using enhanced forecasting methods and interactive public outreach.

SCAG's Local Profile Reports are intended to provide jurisdictions with updated demographic, economic, education, housing, and transportation data and analysis to support community planning and outreach efforts. SCAG's 2017 Local Profile Reports for the City of Santa Monica and the County of Los Angeles estimates that there were 93,640 residents in the City and 10,241,335

2 The average household size reflects the average household size for the City of Santa Monica, based on the 2010 U.S. Census.

3 A group quarters is a place where people live or stay, in a group living arrangement, that is owned or managed by an entity or organization providing housing and/or services for the residents. This is not a typical household-type living arrangement. People living in group quarters are usually not related to each other. Group quarters include such places as college residence halls, residential treatment centers, skilled nursing facilities, group homes, military barracks, correctional facilities, and workers' dormitories.

residents in the County of Los Angeles in 2016.[4,5] This is generally consistent with the ACS's estimate of 92,247 (within 1 percent) and the California Department of Finance (DOF), which estimates that in 2017, the population of the City reached 93,834 residents, while the population of Los Angeles County reached 10,241,278. This information is shown in **Table 4.14-3**, *SCAG 2016 Population, Housing, and Employment Estimates, as well as household and employment information which indicates that the City had 47,900 households and 192,639 employees in 2016*.

TABLE 4.14-3
SCAG 2016 POPULATION, HOUSING, AND EMPLOYMENT ESTIMATES

Jurisdiction	Population	Households	Employment
City of Santa Monica	93,640	47,900	92,639
Los Angeles County	10,241,335	3,308,022	4,424,056

SOURCE: Based on the 2016 statistical summary data from the 2017 Local Profile Reports for Santa Monica and Los Angeles County from Southern California Association of Governments. .

Housing Availability

Within the City, region, and the State as a whole, there is a severe shortage of housing units. The rate of population and household growth has exceeded the pace of new housing units. The housing crisis is well documented – a 2018 report from the California Department of Housing and Community Development (HCD) found that the median 2017 price of a single family home in the State is $500,000 (twice the national cost), the State ranks 49th among the 50 U.S. states for housing units per capita, and only 34 percent of households in the State can afford to purchase the median priced home. At the City level, the housing shortage is evidenced by the high cost of housing where the median rent is $4,799 per month and vacancy rates are at a low 0.9 percent for homeownership units and 2.2 percent for rental units. The HCD estimates that from 2015-2025, approximately 1.8 million new housing units are needed to meet projected population and household growth, or 180,000 new homes annually.

4.14.2.3 Projected Future City and Regional Conditions

City Projections

The City's General Plan LUCE establishes the guiding framework for new development in the City. The City has prepared population, housing, and employment projections through the year 2030 based on the goals, policies, and standards established in the LUCE as well as the Downtown Community Plan (DCP). **Table 4.14.4**, *City Population, Household, and Employment Projections*, identifies these projections. As indicated therein, the City projects that in 2030 it will have a population of 102,726, 56,306 housing units, and employment of 105,800. The City does not have 2040 population estimates since the LUCE and DCP horizon year is 2030.

4 Southern California Association of Governments, 2017 Local Profile Report for the City of Santa Monica, https://www.scag.ca.gov/Documents/SantaMonica.pdf, accessed February 21, 2019.

5 Southern California Association of Governments, 2017 Local Profile Report for Los Angeles County, https://www.scag.ca.gov/Documents/LosAngelesCountyLP.pdf, accessed February 21, 2019.

TABLE 4.14-4
CITY POPULATION, HOUSEHOLD, AND EMPLOYMENT PROJECTIONS

Jurisdiction	2030 City Projections[a]
Population	
City of Santa Monica	102,726
Housing Units	
City of Santa Monica	56,306
Employment	
City of Santa Monica	105,800

[a] The City's 2030 projections are not interpolated to the buildout year of the Project (2041) in this table, as they are for the SCAG projections in Table 4.14-5, because the City has indicated the City demographics fluctuate from year-to-year thereby making a straight line projection from 2016 to 2041 inaccurate. Hence, the analysis in this section is conservative because it evaluates the Project against the City's 2030 demographic projections and thus does not account for City growth from 2030 through 2041.

SOURCE: Based on anticipated housing and commercial growth data from the City of Santa Monica per the General Plan Land Use and Circulation Plan, adopted July 6, 2010, revised July 24, 2015, and the City of Santa Monica Downtown Community Plan, adopted July 2017, https://www.smgov.net/uploadedFiles/Departments/PCD/Plans/Downtown-Specific-Plan/FINAL%20DCP_web.pdf, accessed February 21, 2019.

SCAG Projections

SCAG prepared regional population, household, and employment projections in the 2016–2040 RTP/SCS. These projections are used for federal and state mandated long-range planning efforts. SCAG's projections are informed largely by data and information provided by local jurisdictions. The 2016 - 2040 RTP/SCS is based on growth projections for populations, households, and employment prepared for regional, county, and local jurisdictional areas and transportation analysis zones (TAZs). The 2016 - 2040 RTP/SCS reports demographic projections for 2012, 2020, 2035 and 2040. The 2016 - 2040 RTP/SCS forecasts represent the likely growth scenario for the Southern California region in the future, taking into account recent and past trends, reasonable key technical assumptions, and local or regional growth policies. SCAGs future population forecasts are projected using a model that takes into account factors such as natural births, the number of deaths, and the number of persons moving into and out of the region. The patterns of migration are allocated at the local level based on such factors as general plan and zoning designations, and jurisdictional permit application activity.

The SCAG projections for 2040 and 2041 (the Project buildout year - interpolated from the RTP/SCS 2012 – 2040 data), are shown in **Table 4.14-5**, *SCAG Population, Household and Employment Projections*, and discussed below. As indicated therein, based on SCAG 2040 projections interpolated to 2041, the City would have a population of 103,774, 54,115 households, and employment of 104,186 in 2041, while the County would have a population of 11,573,400, 3,968,0000 households, and employment of 5,254,200. For the City, this would represent a 9.8 percent increase in population, 11.5 percent increase in households, and 11.0 percent increase in employment between 2016 and 2041. For the County, it would represent 11.5, 16.6 percent, and 15.8 percent increases, respectively.

TABLE 4.14-5
SCAG POPULATION, HOUSEHOLD, AND EMPLOYMENT PROJECTIONS

	2040 Projections	Project Buildout Year - 2041		
		Projected	Growth[a]	Percent Increase
Population				
City of Santa Monica	103,369	103,774	10,134	9.8%
Los Angeles County	10,225,250	11,573,400	1,332,065	11.5%
Households				
City of Santa Monica	53,866	54,115	6,215	11.5%
Los Angeles County	3,434,750	3,968,000	659,978	16.6%
Employment				
City of Santa Monica	103,724	104,186	11,547	11.0%
Los Angeles County	4,558,000	5,254,200	830,144	15.8%

[a] Growth compares Projected 2041 data to 2016 data shown in Table 4.14-3.

SOURCE: ESA. Based on data from Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016. Estimates for 2041 are based on interpolation of SCAG data presented for 2020 and 2040.

4.14.3 Regulatory Framework

4.14.3.1 State

Senate Bill 35

California Senate Bill 35 (SB-35), effective January 1, 2018, requires cities not meeting their Regional Housing Need Allocation (RHNA) goal for affordable housing to streamline the approval of certain housing projects by providing a ministerial approval process, removing the requirement for CEQA analysis, and removing the requirement for Conditional Use Authorization or other similar discretionary entitlements granted by a Planning Commission. Cities may be exempted from the SB 35 streamlining process if the state's department of Housing and Community Development ("HCD") determines that a city has met its share of RHNA goals pursuant to state law.

In early 2018, the City of Santa Monica submitted annual progress reports for 2014-2016 showing that Santa Monica is in full compliance with meeting RHNA allocations. The City is working diligently with HCD to ensure expeditious review of the submitted progress reports so that Santa Monica is not subject to SB35 streamlining provisions.

4.14.3.2 Regional

Southern California Association of Governments

The Project Site is located within the jurisdiction of SCAG, a Joint Powers Agency established under California Government Code Section 6502 et seq. Pursuant to federal and State law, SCAG serves as a Council of Governments, a Regional Transportation Planning Agency, and the Metropolitan Planning Organization (MPO) for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties. SCAG's mandated responsibilities include developing plans and

policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. Specifically, SCAG is responsible for preparing the RTP/SCS and RHNA, in coordination with other State and local agencies. These documents include population, employment, and housing projections for the region and its local jurisdictions.

Regional Transportation Plan/Sustainable Communities Strategy

In April 2016, SCAG's Regional Council adopted the 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's land use, transportation, and related challenges. The RTP/SCS contains baseline socioeconomic projections that are the basis for SCAG's land use and transportation planning, and the provision of services by local agencies.

The 2016-2040 RTP/SCS is intended to provide an integrated land use and transportation planning approach to meet sustainability goals and maximize the productivity of, and strategically expand the region's transportation system. An important component of this strategy is "Smart Land Use." (SCAG 2016b) SCAG has been working with subregions and local communities to encourage new development near public transit services and improve the jobs/housing balance. Smart land use strategies encourage walking, biking, and transit use, thereby reducing vehicular demand. This saves travel time, reduces pollution, and leads to improved health. A component of the SCAG strategy has been to focus increased density in High Quality Transit Areas (HQTAs), areas within one half mile of a fixed guideway transit stop or bus transit corridor.

Bus transit service within one-half mile of the Project Site includes four Santa Monica Big Blue Bus routes and one Los Angeles County Metro route, with stops along Santa Monica Boulevard (a bus transit corridor) and 20th Street. These bus stops are located within one and two blocks of all Project Site on the PSJHC Campus. Three Breeze Bike Share Hubs are located within one-half mile of the Project Site: at Broadway and 20th Street, 20th Street and Arizona Avenue, and at Broadway and Cloverfield Boulevard. In addition, while the Project Site is not located within one half mile of a fixed guideway transit stop, two Los Angeles County Metropolitan Transportation Authority (Metro) rail stations are located within approximately 0.7 miles of the Project Site, including the 17th Street/Santa Monica College Station of the Exposition Light Rail (Expo) line, and 26th Street/Bergamot Station of the Expo Line. Therefore, the Project Site is located within an HQTA.

Regional Housing Needs Assessment

SCAG determines regional housing needs and the share of the regional needs to be addressed by Los Angeles County and its constituent cities. SCAG prepares the RHNA for the County of Los Angeles, of which the City is a part. The RHNA does not necessarily encourage or promote growth, nor does it require the City to build the number of housing units that it projects (although sufficient opportunity to do so must be provided). Its purpose is to plan for population growth, so that the region and subregion will collectively produce sufficient housing to meet population needs and address social equity, with each jurisdiction providing its fair share housing needs.

The RHNA identifies the housing needs for very low income, low income, moderate income, and above moderate income groups. The most recent RHNA allocation, the "5th Cycle RHNA Allocation Plan", was adopted by the Regional Council on October 4, 2012. This allocation

identifies housing needs for the planning period between January 2014 and October 2021. Local jurisdictions are required by State law to update their General Plan Housing Elements based on the most recently adopted RHNA allocation.

Santa Monica's allocation in the 5th cycle (2014-2021) is for the provision of 1,674 units, of which 42 percent would be above moderate rate units and 58 percent affordable/moderate rate units. Of the later, 283 units would be for moderate income households, 263 would for low income households, and 428 for very low income households.

4.14.3.3 City of Santa Monica

General Plan - Land Use and Circulation Element

The Land Use and Circulation Element (LUCE) of the City's General Plan encompasses the City's vision for land use and circulation development in the City. The LUCE establishes a comprehensive, sustainable approach to development with goals and policies that guide where and how new development should be located. It directs new land uses along the City's transit-rich corridors and in the districts served by the Expo Light Rail line. In other areas of the City it seeks to conserve the scale and character of the City's neighborhoods.

Toward this end, the LUCE defines and provides goals and policies for 10 districts with varied characters and roles within the overall fabric of the City. The Project Site is located in the Healthcare Mixed Use District which allows for a variety of uses designed to support PSJHC and SM-UCLA, including hospital, medical office, pharmacies, residential care, rehabilitation and outpatient clinics, affordable, workforce and market-rate housing targeted at hospital employees, extended stay lodging for patient families, and supporting retail uses. Applicable population and housing-related LUCE goals and polices are listed below:

Goal LU10: Community Benefits – Requires new development to contribute directly to the community's core social, physical, and transportation goals through mechanisms such as community benefits.

> **Policy 10.2 Benefits Tied to Community Values:** Require certain development to provide measurable benefits to foster complete neighborhoods and support the goals of the LUCE, including reducing vehicle trips and GHG emissions, maintaining diversity, and promoting affordable and workforce housing.
>
> **Policy LU10.3 Affordable and Workforce Housing:** Focus on additional affordable and workforce housing with an emphasis on employment centers in proximity to transit facilities.

Goal LU11: Create Additional Housing Opportunities – Provide additional opportunities for a diversity of housing options for all income groups and advance the City's sustainability goals through housing production.

> **Policy LU11.1 Neighborhood Housing:** Continue to support the healthy, diverse neighborhoods that provide a range of housing choices to meet the needs of its residents.

Policy LU11.3 Housing Incentives: Provide incentives to build and increase the ratio of affordable and workforce housing and to conserve character defining multifamily housing.

Goal H4: Provide increased opportunities to stimulate a variety of housing choices.

Policy H4.1: Encourage the production of both rental and ownership housing.

General Plan - Housing Element

California's Housing Element Law requires that each city and county prepare a Housing Element in its General Plan that includes programs to meet its "fair share" of existing and future housing needs for all income groups. The City's Housing Element (certified by the state on January 29, 2014) meets the requirement to provide suitable sites consistent with the RHNA; however, for the 2014 to 2021 planning period, the City's proposed quantified objective of 1,371 new residential units is lower than the RHNA. The City's quantified objectives include 1,371 units of which 51 percent would be above moderate rate units and 49 percent would be affordable/moderate rate units. Of the later, 111 units would be for moderate income households, 263 would be for low income households and 297 would be for very/extremely low income households. The City's quantified objective is based on an evaluation of available resources and represents a level that the City believes is reasonable given the uncertainty of available resources from the State and other sources following the termination off redevelopment funds for affordable housing.

The 2013–2021 Housing Element includes programs that prioritize efforts to generate new funding sources from local, state, and federal opportunities for affordable and workforce housing. The City's policies and programs, including zoning regulations and the Affordable Housing Production Program, already promote the development of extremely low income, very low income, low income, and moderate income units. Additionally, the City continues to negotiate on a case-by-case basis the construction of additional affordable housing units as a community benefit as part of development agreement projects, which may also assist in meeting the City's quantified objective in the RHNA. Among the goals and policies of the Housing Element are the following which specifically address the construction of private sector development:

Goal 1.0: Construction of new housing that is high quality, sustainable, compatible with the surrounding neighborhood and offers opportunities for active living.

Policy 1.1: Provide adequate sites for all types of housing, particularly multi-family housing in locations near transit and services that promote walkability.

Policy 1.2: Encourage and provide incentives for the development of housing in mixed-use zoning districts near transit opportunities.

Hospital Area Specific Plan

The Hospital Area Specific Plan (HASP) was adopted in 1988 and revised in 1993 and 1998 (concurrently with the PSJHC DA). The HASP covers the PSJHC, Santa Monica-University of California - Los Angeles (SM-UCLA Medical Center at 1250 16th Street in Santa Monica, and the surrounding neighborhoods. The intent of the HASP is to address issues of neighborhood concern, address the needs of modern hospitals in a competitive health care environment, to develop basic zoning and development standards, to identify parcels for rezoning, and to identify other programs

which should be implemented in the area. The contents of the HASP consist of legal requirements for a specific plan; background information about the study area and the hospitals Master Plans; an analysis of projected gross development of the area; consistency of the HASP objectives with the General Plan land use, circulation, conservation and open space element, noise element, scenic highways element, and public safety element; and an implementation program. Applicable population and housing-related HASP objectives are listed below:

- **Objective 1:** Ensure that development in the hospital area balances the need for medical facilities and uses while protecting residential uses in the area.
- **Objective 6:** Support LUCE policies for residential districts, Wilshire Boulevard, and Santa Monica Boulevard. (City of Santa Monica 1988)

Santa Monica Municipal Code

Chapter 9.64 Affordable Housing Production Program

The City's Affordable Housing Production Program (AHPP) requires developers of market rate multi-family developments to contribute to affordable housing production and thereby help the City meet its affordable housing need. All multi-family projects in residential zones must provide on-site or off-site affordable housing units, pursuant to various provisions of the chapter.

Chapter 9.23 Community Benefits, Section 9.23.030 Qualifying Benefits

Chapter 9.23 establishes regulations for implementing General Plan policies that allow increases in base height and density limits for new development in return for community benefits that enhance Santa Monica's valued community character. Section 9.23.030, Qualifying Benefits, includes Tier 2 housing requirements over and above those required for Tier 1 developments. The requirements specify increases in number of affordable housing units, the size of the units (e.g., number of bedrooms), and the payment of Affordable Housing Commercial Linkage mitigation fees for mixed use and non-residential projects that are developed under Tier 2 standards.

4.14.4 Environmental Impacts

4.14.4.1 Methodology

The analysis of impacts on population, housing and employment compares the Project's anticipated population, housing, and employment estimates to growth projections at the local level (i.e., City of Santa Monica) and the regional level (i.e., County of Los Angeles).

The Project's residential population is calculated based on the average household size within the City, as reflected in both the SCAG 2016 - 2040 RTP/SCS estimates and City LUCE estimates. The Projects' number of employees is calculated using employee estimates provided by PSJHC.

The projections of future population, housing, and employment are prepared by SCAG for the 2016 - 2040 RTP/SCS. The 2016 - 2040 RTP/SCS reports demographic projections for 2012, 2020, 2035, and 2040. The 2016 - 2040 RTP/SCS forecasts represent the likely growth scenario for the Southern California region in the future, taking into account recent and past trends, reasonable key technical assumptions, and local and regional growth policies. Estimates for the Project's buildout (2041)

year has been interpolated from SGAG's 2020 and 2040 projections. The analysis also compares the Project's contribution to growth to the amount of expected growth anticipated by the City through 2030 per the General Plan. However, the City's 2030 projections are not interpolated to the 2041 because the City has indicated that City demographics fluctuate from year-to-year thereby making a straight line projection from 2016 to 2041 inaccurate. Hence, the analysis in this section of Project consistency with City growth projections is conservative because it evaluates the Project against the City's 2030 demographic projections and thus does not account for City growth from 2030 through 2041.

4.14.4.2 Thresholds of Significance

Appendix G of the State CEQA Guidelines provides screening questions that address potential impacts related to population growth and displacement of housing or population. The CEQA guidelines provides that lead agencies may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects, and the use of Appendix G as a significance threshold is routinely sanctioned by the courts (although such use is not mandatory). These questions are listed below and are used as the significance thresholds by the City in this section.

Would the project:

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

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

4.14.4.3 Project Characteristics

Project Characteristics

The Project would demolish the existing medical buildings, a vacant 10-unit apartment building, and surface parking, and develop in their place new medical buildings, conference center, and 30-34 visitor housing units, 10 replacement apartment units, structured parking, and enhanced vehicular and pedestrian circulation connections.[6] As detailed in Chapter 2, *Project Description*, of this EIR, the Project would include the demolition of approximately 110,055 sf of existing building floor area and the development of approximately 682,700 sf of new building floor area, for a net increase in building floor area of approximately 572,645 sf. In addition: (1) two of the 10 replacement housing units would be affordable units as required by Section 3.14.1(b) of the 1998 PSJHC DA; (2) it is assumed that the 177 existing employees at the Phase II Development Sites would continue to work at the Project Site under the proposed Project; and (3) the visitor housing would be restricted to overnight visitations by PSJHC inpatients and outpatients, visiting health care professions, and participants in health care conferences and seminars at the PSJHC Campus, as required by Section 3.3.1(s) of the DA.

[6] The existing apartments have been vacant since at least 1998. Currently, Providence Saint John's takes care of any maintenance issues related to the vacant apartment building. It has not been decided who will own and/or manage the 10 new replacement apartments in the S2 building. Because this has not been decided, the marketing strategy and target population has not yet been identified.

4.14.4.4 Project Impacts

Population Growth

Impact PH-1: *Would the Project induce substantial unplanned population growth in an area, either directly (for example by proposing new homes and businesses) or indirectly (for example,*

Impact Statement PH-1: The Projects would develop new medical uses and replacement and visitor housing, and would create new jobs, that would result in a net increase in employment in the City and region and an indirect demand for housing. These increases would be consistent with the growth projected in the City's LUCE and SCAG's 2016-2040 RCP/SCS. Therefore, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly, and impacts would be less than significant.

The Projects population, housing and employment estimates are summarized in **Table 4.14-6**, *Project Population, Housing and Employment Estimates*. As indicated therein, the Project would result in a net increase of an estimated 19 permanent residents, 56-64 short-term guests/visitors, 0 residential units, 30-34 visitor housing units, and 646 employees.

Consistency with LUCE and SCAG Growth Projections

The Project's population, housing and employment estimates are compared to the growth anticipated within the City and the County in **Table 4.14-7**, *Project Population, Housing and Employment Impacts*. Table 4.14-7 compares the Project's contributions to growth to the growth projections anticipated by the City and SCAG's 2016 - 2040 RTP/SCS.

Population

Based on the average household size of 1.94 people per household, the Project would generate an estimated net increase of up to 19 permanent residents, which is a conservative estimate assuming no current residents in existing on-site apartments. This would represent approximately 0.2 percent of the population growth projected by the City, and approximately 0.2 percent and 0.001 percent, respectively, of the population growth projected for the City and County in SCAG's 2016-2040 RTP/SCS, between 2016 and 2041. These percentages would be small. Also, the Project's increase in population has been accounted for, and would be consistent with, both the growth projections for the City in the LUCE and the growth projections for both the City and region in the SCAG's 2016-2040 RTP/SCS. This is because: (1) the Project would be consistent with the existing zoning of the Project Site which serve as the basis for these growth projections. In addition, the Project would represent infill development, and would not extend roads or utility infrastructure to areas not already currently served, such that it would not be growth inducing.

TABLE 4.14-6
PROJECT POPULATION, HOUSING AND EMPLOYMENT ESTIMATES

					Resident Population			Employment
Dev.Site #	**Building Name**	**Use**	**Max* Amount (sf/unit)**	**Max Floor** Area**	**Permanent Residents[a]**	**Short-Term Guests/Visitors (in visitor housing)**	**Permanent Housing (units)**	**Employees**
S1	Child & Family Development Center	child and family development	25,000 sf	**34,500 sf**	--		--	2
		day care	25,000 sf		--		--	4
S2	Multifamily Housing	multifamily housing	10 units	**10 units plus 800 sf** commercial	19		10	--
		restaurant or neighborhood commercial	800 sf		--		--	2
S3	West Ambulatory Care & Research Building	hospital/health care	65,000 sf	**123,000 sf**	--		--	44
		medical research	123,000 sf		--		--	50
		restaurant, neighborhood com., or health services	5,000 sf		--		--	5
		heath and wellness	90,000 sf					-- [d]
S4	Education & Conference Center and East Ambulatory Care & Research Building	education & conference cntr.	60,000 sf	**199,000 sf**	--		--	8
		hospital/health care	120,000 sf		--		--	74
		health and wellness	90,000 sf		--		--	45
		medical research	120,000 sf		--		--	--[e]
		health services, restaurant, or neighborhood commercial	10,000 sf		--		--	14
S5	Visitor Housing	visitor housing	30-34 units	**38,000 sf**		56-64	--	5
--	Saint John's Cafe'	restaurant or neighborhood commercial	900 sf	**900 sf**	--		--	2

					Resident Population			Employment
Dev.Site #	**Building Name**	**Use**	**Max* Amount (sf/unit)**	**Max Floor** Area**	**Permanent Residents[a]**	**Short-Term Guests/Visitors (in visitor housing)**	**Permanent Housing (units)**	**Employees**
2C	West Ambulatory & Acute Care Building	hospital/health care	117,500 sf	**123,350 sf** above grade	--		--	107
		health services, restaurant, or neighborhood commercial	5,500 sf	**6,150 sf** below-grade	--		--	11
		medical research	117,500 sf					--[e]
		health and wellness center	90,000 sf					-- [d]
2D/E	East Ambulatory & Acute Care Building	hospital/health care	78,500 sf	**65,800 sf** above grade	--		--	142
		medical research	78,500 sf					--[e]
		health and wellness	78,500 sf					--[d]
		health services, restaurant, or neighborhood commercial	3,000 sf	**16,400 sf** below grade	--		--	6
2I	20th Street Medical Building	medical office	50,000 sf	**73,300 sf**	--		--	104
		health services, restaurant, or neighborhood commercial	4,500 sf		--		--	9
--	Mullin Plaza Cafe	restaurant or neighborhood commercial	1,500 sf		--		--	3
	Phase II Parking							9
			Total (Net)		**19**	**56-64**	**10**	**646**
			Total Existing		**0[c]**	**0**	**10[c]**	**177**

*The sum of the permitted floor area/units per use are subject to the overall maximum floor areas/units per Vested Use in accordance with the DA as it is proposed to be amended (discussed in Section 2.6.2).

**For some buildings, the sum of the maximum floor areas for the Vested Uses that may occur within the building exceeds that overall building's floor area in order to allow some flexibility for establishing the eventual location and the not-to-exceed amount of certain Vested Uses within the Phase II buildings.

TABLE 4.14-7
PROJECT POPULATION, HOUSING, AND EMPLOYMENT IMPACTS

		City		SCAG (RTP/SCS)	
	Project Net Increase	Projected Growth (2016-2030)[a]	Project Percentage of Growth	Projected Growth (2016-2041)	Project Percentage of Growth
Population (e.g., permanent residents)					
City of Santa Monica	19	10,479	0.2%	10,134	0.2%
Los Angeles County		--	--	1,332,065	0.001%
Households (e.g., housing units)					
City of Santa Monica	0	5,025	0.0%	6,215	0.0%
Los Angeles County		--	--	659,978	0.0%
Employment					
City of Santa Monica	646	3,700	17.5%	11,547	5.6%
Los Angeles County		--	--	830,144	0.08%

[a] The City's 2030 projections are not interpolated to the buildout year of the Project (2041) in this table, as they are for the SCAG projections in Table 4.14-5, because the City has indicated the City demographics fluctuate from year-to-year thereby making a straight line projection from 2016 to 2041 inaccurate. Hence, the analysis in this section is conservative because it evaluates the Project against the City's 2030 demographic projections and thus does not account for City growth from 2030 through 2041.

[b] Calculation assumes employment of 102,100 persons at the end of 2015 based on Table 4, Projected Employment Growth for City of Santa Monica 2008-2030 (Rounded), LUCE 2015.

SOURCE: ESA 2018. Based on projections in the City's 2015 LUCE and SCAG's 2016 - 2014 RTP/SCS, as interpolated to 2018 and 2041.

Housing

The Project would provide 10 multi-family residential units at the Project Site to replace the 10 existing vacant multi-family residential units to be removed. Therefore, there would be no net loss or increase in housing under the Project, and given that the Project Site is not zoned for residential development, the no net change in the number of housing units would be consistent with the LUCE and SCAG's 2016-2040 RTP/SCS. Also, the Project would represent infill development, and would not extend roads or utility infrastructure to areas not already currently served, such that the Project would not be growth inducing. Furthermore, as required by Section 3.14.1(b) of the 1998 PSJHC DA, the Project would provide 20 percent of the proposed replacement apartment units as affordable units.

While the Project proposes 30-34 new visitor housing units, these units would be open only to PSJHC patient families, visiting physicians, and guests of conventions on the PSJHC Campus. Therefore, these units are not considered new housing in the City for purposes of this analysis. This assumption provides a conservative analysis of the housing impacts of the Project.

Employment

Based on information from PSJMC, the Project's proposed medical uses would generate an estimated 823 employees at the Project Site, or a net increase of 646 employees. This net increase in employees would represent approximately 17.5 percent of the growth in employees projected for the City in the LUCE between 2015 and 2030, and approximately 5.6 percent and 0.08 percent,

respectively, of the growth in employees projected for the City and County in SCAG's 2016-2040 RTP/SCS, between 2016 and 2041. While the Project-related increase in employees would represent between 5.6 and 17.5 percent of the increase in employees projected for the City, PSJHC is already one of the largest employers in the City, and as indicated previously: (1) the Project would be consistent with the existing zoning of the Project Site such that this increase in employment is already included in the growth projections for employees in the LUCE and SCAG's 2016-2040 RTP/SCS; and (2) the Project would develop less uses, and thus generate less employees, than has already been vested at the Project Site by the PSJHC DA.[7] Lastly, as indicated previously, the Project would represent infill development and would not extend roads or utility infrastructure to areas not already served.

Conclusions

Based on the above, the Project would not directly or indirectly induce substantial unplanned population growth in the area, and the impact would be less than significant.

Displacement of People of Housing

Impact PH-2: *Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

Impact Statement PH-2: The Project would replace the 10 existing multi-family housing units on the Project Site with 10 new multi-family housing units. Therefore, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. The impact would be less than significant.

The Project would replace the 10 existing vacant, rent controlled multi-family housing units on the Project Site with 10 new multi-family housing units. As these residences are currently vacant, the Project would not displace any residents. Furthermore, as required by Section 3.14.1(b) of the 1998 PSJHC DA, two of the 10 new units would be affordable units. Therefore, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and the impact would be less than significant.

4.14.4.5 Cumulative Impacts

Table 3-1, *List of Cumulative Projects,* in Chapter 3 of this EIR, lists those development projects that are under construction, approved, and pending in the City and adjacent areas of the City of Los Angeles. The Project, in combination with those 112 of the 131 cumulative projects in the City, would contribute to growth occurring in the City and the region. The City continually monitors the status of new development proposals and incorporates growth information into its planning activities and advises SCAG accordingly for its future projections. The City reviews new projects

[7] The PSJHC 1998 DA (Section 3.7.3(a)-(b)) established vested rights for up to 799,000 sf of floor area, 10 replacement apartments, and up to 100 visitor housing units at the Phase II Development Sites (see Table 2-2 in Chapter 2, *Project Description*, of this Draft EIR for a breakdown of the vested uses). This is compared to the 682,700 sf of floor area, 10 replacement housing units, and 56-64 visitor housing units proposed under the Project (see Table 2-3 in Chapter 2 for a breakdown of the proposed uses).

to ensure that they are consistent with the LUCE and Zoning Ordinance's guidance and standards for new development.

As indicated previously, the City projects that the City's population, households, and employment would increase by 10,479 residents, 5,025 households, and 3,700 employees, respectively between 2016 and 2030, and the Project's proportion of these increases would be approximately 0.2 percent, 0.0 percent, and 17.5 percent, respectively. Also as indicated previously: (1) the Project would be consistent with the LUCE, and would include less development than currently vested at the Project Site by the PSJHC DA, such that the Project has already been accounted for in the growth projections in the LUCE and RTP/SCS; and (2) the Project is a proposed infill development, would not extend streets or utility infrastructure to areas not already served by such infrastructure, and would not include a net increase in permanent housing, such that the Project would induce unplanned growth.

The City's population, household, and employment forecasts serve as the basis for planning and the provision of future services in the City. The City continually monitors its development and coordinates with SCAG in the preparation of updates to the RTP/SCS. Updates are prepared at four-year intervals. The next RTP/SCS update is programmed for 2020. This allows SCAG to provide sufficient data for planning services and infrastructure to meet the long-term needs of the City. However, even of one or more of the cumulative projects were to result in substantial population growth inducement (such as could potentially occur if the proposed density would substantially exceed the density permitted by the existing zoning), the Project would not contribute considerably to any such population growth inducement for the reasons stated above. Therefore, cumulative population and housing impacts would be less than significant

For identification of the cumulative impacts for the other environmental topics where population growth is a factor, see the following sections of this EIR: 4.2, *Air Quality*; 4.3 *Construction Effects*, 4.8, *Greenhouse Gas Emissions*; 4.12, *Neighborhood Effects*; 4.13, *Noise and Vibration*; 4.15, *Police Protection*; 4.16, *Fire Protection*; 4.17, *Transportation*; 4.19, *Water Supply*; 4.20, *Wastewater*, and 4.21, *Solid Waste*.

4.14.5 Mitigation Measures

Impacts are less than significant. No mitigation measures are required.

4.14.6 Level of Significance After Mitigation

Mitigation measures are not applicable. Impacts are less than significant.

4.15 Public Services – Police Protection

4.15.1 Introduction

This section analyzes the Project's potential construction and operational impacts on police protection services in the City. The analysis addresses whether new or physically altered police facilities, the construction of which could cause significant environmental impacts, would be required to provide police protection services to the Project. The analysis is based on information provided by the City, primarily the Santa Monica Police Department (SMPD). This information includes statistical data regarding police protection facilities and services. This information is included in Appendix K of this EIR.

4.15.2 Environmental Setting

4.15.2.1 Existing Conditions

The Project Site is located in the City's Healthcare Mixed Use District within the PSJHC Campus. The PSJHC Campus is located on both the north and south sides of Santa Monica Boulevard between 20th Street and 23rd Street. The North Campus extends to Arizona Avenue to the north and the South Campus extends to Broadway to the south.

The PSJHC Security Management Plan outlines the various responsibilities of its staff with respect to ensuring the security of patients, visitors, staff and property. PSJHC staff include a Director of Security, a Facility Safety Officer, Security Supervisor and Public Safety Officers. The Director of Security's, in conjunction with the Facility Safety Officer's responsibilities include developing, reviewing, enforcing and evaluating the Security Management Plan and hospital policies that support the plan and creating education plans for staff regarding their responsibilities. The Security Supervisor's responsibilities include implementing the Security Management Plan, ensuring daily operations of the Security Department and taking action to correct security issues that pose a risk to employees, patients or visitors, informing the Director of Security and the Safety Officer of changes in the work environment that may impact security or safety risks, and collecting, processing and reporting of security activity. The Security officers oversee the daily operation of the hospital security program and assist employees, patients and visitors with training, support and problem solving. In addition, each department at the Health Center has Department Managers that are responsible for communicating security information and notices to their staff, timely reporting of security incidents and concerns. Security officers are available at the health center 24 hours per day, 7 days per week. All PSJHC caregivers have a role in security by monitoring their areas for security risks and breaches, reporting security and safety incidents, participating in security training programs, knowing how to respond to all emergency codes and following PSJ's security procedures.

PSJHC managers and security team meet daily at their "facility safety huddle" where security staff provides a brief update on all critical security and safety issues. On a monthly basis, security staff provides a briefing to the Chief Operating Officer on important security and safety issues. PSJHC provides security trainings at new hire orientations, as well as part of an annual competency training for all staff.

With respect to coordination with the Santa Monica Police Department, the PSJHC Chief Operating Officer meets regularly with SMPD Community Officers. The Chief Executive Officer and the Chief Operating Officer meet annually with the SMPD Chief and the Santa Monica Fire Department Chief. In addition, PSJHC security plans and policies provide for communication and coordination with the SMPD including how to most effectively communicate with SMPD about the situation and where to meet with SMPD when they arrive. There is a direct line to SMPD installed in the Emergency Department. This line is primarily for use by the Emergency Department staff and Security.

PSJHC also has a separate plan governing operations in the event of disasters and other catastrophic emergencies (e.g. earthquake, fire, etc.) that pose a significant threat to the health center's ability to maintain operational capability and provide care, treatment, and services to its community. This plan covers communication (internal, external, patients and families, and vendors); resources and assets (supplies) sustainability, sharing of resources with other healthcare organizations, evacuation and transportation to alternative facilities; safety and security operations; staff roles and responsibilities; utilities/facilities management; clinical and support activities planning and operations (discharge/transfer of patients, alternative care sites, evacuation, sharing of patient information with healthcare facilities/response agencies, morgue services, special issues related to vulnerable population, etc.); and post-emergency activities.

Other existing security measures used at PSJHC include alarm systems and card-controlled access after-hours.

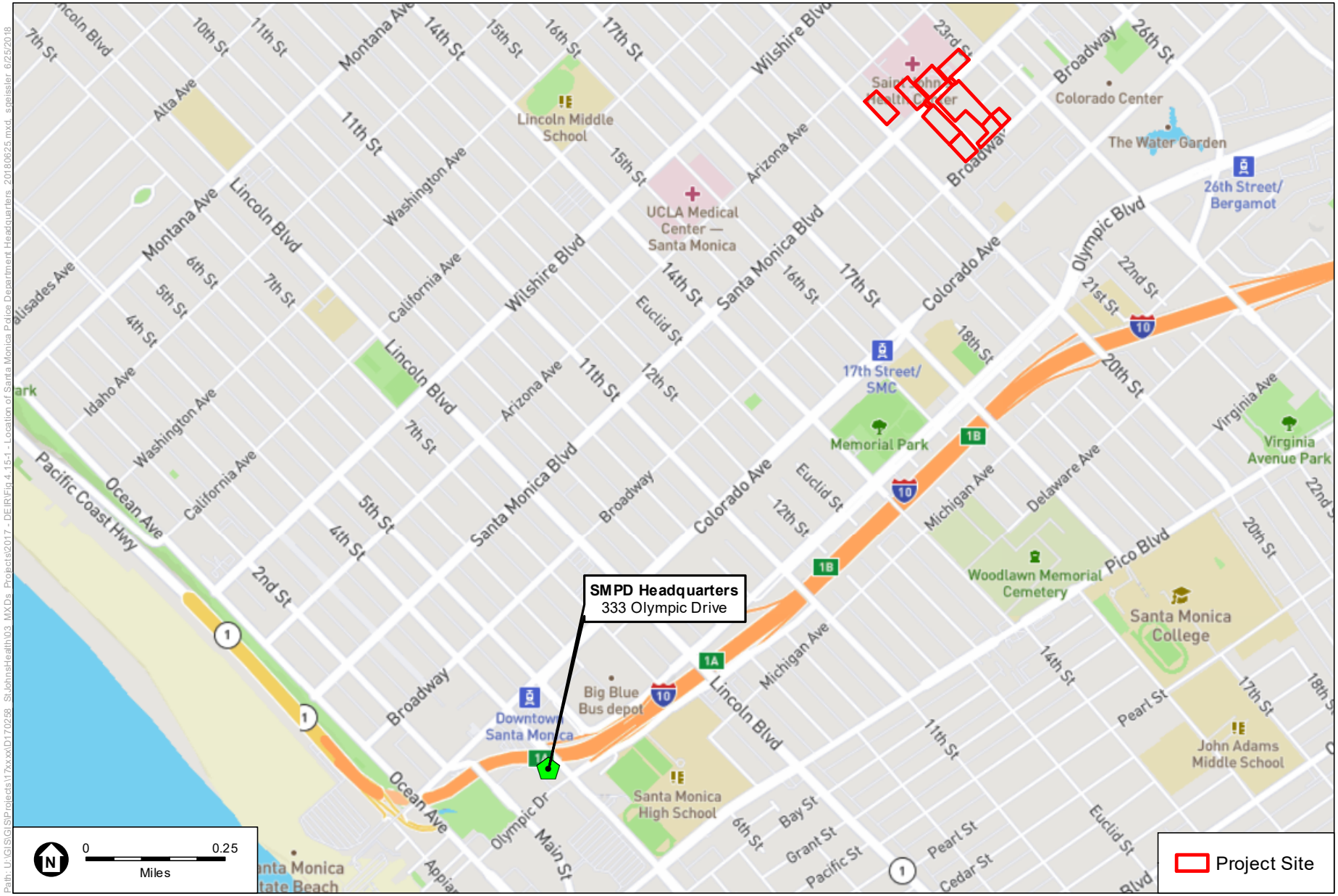
4.15.2.2 Police Protection Services

Police Station and Staffing

Police protection services for both the City and the Project Site are provided by the SMPD. The SMPD provides police services for the City's more than 93,000 residents and a daytime community of up to approximately 250,000 persons on an average day (City of Santa Monica, 2018a). All of the SMPD operations (with the exception of the jail) are coordinated from the SMPD Headquarters located at 333 Olympic Drive, approximately 1.40 miles southwest of the Project Site; refer to **Figure 4.15-1**, *Location of Santa Monica Police Department Headquarters.*

The SMPD has 462 staff positions which include 206 sworn officers (City of Santa Monica 2018b and Santa Monica Police Department, 2018). The SMPD divides the City into four beats which all operate on a 24-hour basis. Patrols are the primary first responder to calls for service and proactive policing. The Project Site is located within Beat 3 (City of Santa Monica 2018b and City of Santa Monica, 2014).

Beat 3 is generally located within the central portion of the City within the boundaries of: Centinela Avenue to the north; Pico Boulevard to the east, Lincoln Boulevard to the south; and Wilshire Boulevard to the West. Officers check in to the SMPD Headquarters and go out to patrol their respective beats. SMPD staffing in Beat 3 is variable based on the day of the week and the time of day, as SMPD responds to differing crime rates during these different periods, as needed.



SOURCE: OpenStreetMap, 2018.

Providence Saint John's Health Center Phase II Project

Figure 4.15-1
Location of Santa Monica Police Department Headquarters

ESA

The SMPD contains five divisions which include administrative services, criminal investigations, the harbor unit, operations, and the strategic services division. The administration services division (ASD) incorporates the administrative services support unit, police technology unit, budget and procurement unit, and the resource development unit. The ASD is primarily responsible for the duties associated with employee benefits and their record keeping, purchasing, employment, and establishing appropriate police and procedures that ensure the SMPD is operating as efficiently as possible. The criminal investigations division (CID) includes the forensic section, the criminal investigations section, and the criminal investigations support section. The harbor unit provides 24-hour security, rescue, and major first-aid service to persons using the pier, ocean, and beach areas. This unit provides a continuous source of phone and over-the-counter public information on weather, tides, boating, fishing and marine matters. The harbor unit works closely with other municipal, County, and State agencies and keeps watch for crimes and potential crimes on the Pier and adjacent beach area. The harbor unit personnel also support the operations of the Pier by maintaining and protecting pier pilings, moorings, and related structures and equipment. The operations division (OD) provides the public with preservation of peace and protection of life and property; 24-hour City patrol; response to calls for service; proactive policing; and patrol-centric approach to community oriented policing. Special units within this division include the public service officer's (PSO), crime impact team (CIT), gang unit, K-9 unit, and the pier and harbor services unit. The strategic services division (SSD) provides the public with Citywide enforcement and education of vehicle code violations; enforcement of State and local laws surrounding commercial vehicles; intersection traffic control and parking enforcement services; crossing guard service to improve pedestrian safety; downtown bicycle team; homeless liaison program (HLP); event planning and coordination; community outreach; animal control; and jail/custody services. The SSD is organized into five sections which include the downtown services section, community services section, jail/custody section, animal control section, and the traffic services section (City of Santa Monica, 20017).

The SMPD is currently well equipped with vehicles and other tactical equipment, though new products or upgrades are continually reviewed and acquired as needed. For example, a Mobile Command Center was purchased in 2015 that provides the SMPD the capability to manage large-scale events or serious tactical incidents from any location with vehicle access. The Mobile Command Center provides key operational capabilities such as communications and technology at the same level as if the command center were located the SMPD Headquarters.

The SMPD resources can be supplemented with additional officers from other jurisdictions during emergency situations and/or conditions of extreme peril. The SMPD maintains mutual assistance programs with the Los Angeles County Sheriff's Department and the City of Los Angeles Police Department. Further, policing in the City is facilitated through numerous community outreach programs, such as Neighborhood Watch and Business Watch. These programs involve community and officer interaction and encourage residents or members of the business community to become acquainted with one another and to form watch groups. Coordination is through the Community Relations Unit and a Crime Prevention Coordinator.

For service planning, the SMPD evaluates the need for improvements and additional staff on an ongoing basis as part of the City's biennial budgeting process. During this budget process, the SMPD allocates funds as necessary towards the Capital Improvements Program and department operating budget. Equipment enhancement programs are considered in the context of the City's budget process, available grants, etc.

Calls for Service and Response Times

In 2016 (most recently available data), the SMPD responded to 119,532 calls, which includes requests for police services made by the public as well as officer initiated activity (City of Santa Monica, Open Data). Response times for calls are based on the incident type and priority of the call. High priority calls for major crimes such as robbery and assault would have lower response times than calls for incidences such as bicycle theft (City of Santa Monica, 2018b). In 2016, the average response time for high priority calls was 5.47 minutes (City of Santa Monica, 2018a). In 2017 (most recently available data), the City had a total of 29,432 incidents within Beat 3, of which 10,766 calls were cancelled (City of Santa Monica, 2018c). Incidents includes calls made by members of the public and those initiated by the SMPD (City of Santa Monica, 2018b).

4.15.3 Regulatory Framework

4.15.3.1 State

California Emergency Services Act

The California Emergency Services Act (Chapter 7, Division 1, Title 2; of the Government Code) provides the basic authorities for conducting emergency operations in the state following the proclamation of Local Emergency. Pursuant to this legislation, the Governor's Office of Emergency Services, CALOES, has prepared the California Disaster and Civil Defense Master Mutual Aid Agreement; which identifies emergency events to be addressed and guidelines to address those events.

4.15.3.2 Regional

Los Angeles Mutual Aid Operations Plan

The Los Angeles Mutual Aid Operations Plan is a formal agreement between every police department in Los Angeles County to ensure a structured response from multiple police departments in the event of an emergency.

4.15.3.3 Local

City of Santa Monica Municipal Code

Santa Monica Municipal Code Section 3.68, Crime Prevention Program, adopts a Comprehensive Crime Prevention program for the City, including teams for crime impact, domestic violence, arson, and other units, to provide law enforcement services, subject to annual review. Provision is also included for review of development plans by the SMPD.

4.15.4 Environmental Impacts

4.15.4.1 Thresholds of Significance

Appendix G of the State CEQA Guidelines provides a screening question that address potential impacts related to police protection services. This question is listed below and is used as the significance thresholds by the City in this section. The CEQA guidelines provides that lead agencies may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects, and the use of Appendix G as a significance threshold is routinely sanctioned by the courts (although such use is not mandatory).

Would the project:

a) 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 police protection services?

4.15.4.2 Methodology

The analysis of impacts on the provision of police protection services addresses the availability and level of existing SMPD police protection services and the potential increase in demand for police protection services as a result of development of the Project, and determines the adequacy of existing and planned facilities to meet future demand; and whether the increased demand for police services would require a need for new or physically altered police facilities, the construction of which could cause significant environmental impacts. Factors that were considered in the analysis of potential impacts on police services include the proposed type of use, land use characteristics and design features of the Project, and existing/planned SMPD resources (including staffing levels, facility locations and sizes, and service provisions). The estimated population and employment generated by the Project that could contribute to the demand for police services is calculated in Section 4.14, *Population and Housing*, of this EIR. The analysis is based, in part, on information provided by both the City and the SMPD and included in Appendix K of this EIR.

4.15.4.3 Project Characteristics

Similar to existing conditions, the PSJHC's security staff would maintain its ongoing regular communications with the SMPD particularly for special events to ensure coordination during emergencies, and would call 911 immediately if SMPD response is required. Additionally, PSJHC staff would be on the premises at all times. Existing security measures used at PSJHC, such as alarm systems, 24-hour security guards/patrols, and card-controlled access after-hours, would be maintained and incorporated into the Project. Further, PSJHC's emergency response plan would continue to be implemented, and updated as necessary, with procedures in place in case of an earthquake, fire, or other emergency to assist patients, staff, and visitors and to coordinate with City departments during emergency circumstances. Lastly, outdoor lighting would be designed to facilitate safe and comfortable use of the PSJHC Campus by pedestrians, bicyclists, and vehicles and to support way-finding around and through the Campus.

4.15.4.4 Project Impacts

Police Protection Services

Threshold Police-1: *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?*

Impact Statement POLICE-1: The Project would develop new medical, healthcare-related, neighborhood commercial, and residential uses which would increase the daytime population and potentially increase the demand for police protection services to the Project Site. The increase in demand for police protection would be off-set through PSJHC site security features and compliance with City security and lighting requirements. With these site security features and regulatory compliance, the Project would not require new or physically altered police service facilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant.

Construction

During construction, equipment, building materials, vehicles, and temporary offices would be temporarily located on the Project Site. As such, the Project Site, if not properly secured, could be subject to trespass, theft or vandalism, potentially requiring SMPD involvement. As discussed above, the Project would incorporate a number of temporary security measures, including, but not limited to, security barriers and fencing (e.g., chain-link fencing), low-level security lighting and locked entry (e.g., padlock gates or guard-restricted access) to limit access by the general public, to secure construction equipment, and to minimize trespassing and vandalism. Regular daily and multiple PSJHC security patrols during non-construction hours would also be provided. Additionally, PSJHC staff would be on the premises at all times. During construction activities, the Project Contractor would document the security measures; and the documentation would be made available to the Project Construction Monitor. Potential effects on Project Site access and adjacent street accessibility would be reduced with flagging and traffic control personnel. Additionally, construction workers generally start and end their work days in advance of peak traffic hours, thus reducing their potential effect on traffic and emergency responses. A Construction Management Plan subject to review and approval by the City's Planning and Community Development Department (PCD) and the Public Works Department, would be incorporated into the Project. The Construction Management Plan would include street closure information, detour plans, haul routes, and staging plans and would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The various safety and control features that would be implemented during Project construction would reduce the potential for incidents that would require police responses. Based on the above, Project construction would not create the need for new or physically altered police facilities, the construction of which would result in substantial adverse environmental impacts, in order to maintain acceptable service. Therefore, potential impacts on police protection services due to construction activity would be less than significant.

Operation

According to Section 4.14, *Population and Housing*, of this EIR, the Project would introduce a net increase of an estimated 19 residents, and up to 64 short term guests/visitors, and 1,124 employees to the Project Site that would potentially result in an increase in SMPD police responses. As discussed in the Environmental Setting section above, the Project Site is served by the SMPD Headquarters which has approximately 462 staff positions which includes 206 sworn officers. The SMPD evaluates the need for improvements and additional staff on an ongoing basis as part of the City's biennial budgeting process. During this budgeting process, the SMPD allocates funds as necessary, towards the City's Capital Improvements Program and SMPD operation costs. Equipment enhancement programs are considered in the context of the City's budget process and available grants.

The Project's security staff would continue ongoing regular communications with the SMPD to ensure coordination during emergencies, and would call 911 immediately if SMPD response is required. Additionally, PSJHC staff would be on the premises at all times. Existing security measures used at PSJHC, such as alarm systems, 24-hour security guards/patrols, and card-controlled access after-hour, would be maintained and incorporated into the Project. Further, an emergency response plan would be implemented in case of an earthquake, fire, or other emergency to assist patients, staff, and visitors and to coordinate with City departments during emergency circumstances. Lastly, outdoor lighting would be designed to facilitate safe and comfortable use of the Campus by pedestrians, bicyclists, and vehicles and to support way-finding around and through the Campus. These security features would help offset Project-related increase in demand for SMPD. Furthermore, the Applicant would consult with SMPD on facility design to harden targets against criminal activity and assist with emergency access to the campus, and Project entryways, elevators, lobbies and parking areas would be well-illuminated and designed with minimum dead space to eliminate areas of concealment, as required by the SMMC (for example, SMMC Section 3.68, Crime Prevention Program).

Project-related increase in traffic within the Project Site and on surrounding roadways could potentially affect emergency response in the area. However, due to the Project Site's proximity to the SMPD Headquarters, approximately 1.40 miles southwest, emergency responses are not expected to substantially affected. Further, emergency response to a site is routinely facilities, particularly for high priority calls, through the use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternative routes, and multiple station response. Emergency access to the Project Site and surrounding uses would be maintained at all times and emergency vehicles would have priority and the ability to bypass signals and stopped traffic. Thus, Project-related traffic is not anticipated to impair the SMPD from responding to emergencies at the Project Site. Finally, the Project would be required to provide adequate access for emergency vehicles to the Project Site, subject to the approval of the SMPD. Consistent with the *City of Hayward v. Trustees of California State University* (Court of Appeal of the State of California, 2015), significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area, and potential impacts on emergency response times are not an environmental impact that CEQA requires a project to mitigate. Further, the SMPD does not establish response time goals based on the Project Site's location; rather response time goals are based on priority of incidences (City of

Santa Monica, 2018b). Accordingly, impacts associated with emergency response and emergency access are considered less than significant.

As the SMPD has no known or proposed plans for new facilities or to expand the SMPD Headquarters, the Project is not expected to require the construction of new or expanded police facilities to meet Project demand. Even if a new police station, or the expansion, consolidation, or relocation of existing station were determined to be warranted by the SMPD, and were foreseeable, the impacts of the construction and operation of such a station would be analyzed at that time under CEQA as a project independent of the proposed Project. Moreover, the City is highly developed, and the site of a new police station or the expansion of a police station would likely be on an infill lot, with expansions often being less than an acre in size in a highly urbanized area. Accordingly, the need for additional police protection services as part of an unplanned or expanded police station at this time is not an environmental impact of the Project or one that the Project is required to mitigate (Court of Appeal of the State of California, 2015). The Project would however, generate revenue (e.g., property and sales tax revenue) for the City's Capital Improvements Program that could be used to fund SMPD expenditures and operation costs as necessary to offset any incremental Project impact on police services. The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City's Capital Improvements Program.

Therefore, the Projects' potential combined increase in demand for police services would be minimal, and would not require new or expanded police protection facilities, given: (1) the relatively small size of the Projects' increase in total service population; (2) the City's ongoing responsiveness to policing needs through its budgeting process; (3) the City's provision of police protection via roving patrol cars rather than out of a centralized facility; (4) Project design/security features that would enhance safety (e.g., controlled access, security gates, CCTV camera security monitoring) and help reduce police protection service; (5) PSJHC security staff's continued and regular coordination with SMPD and Campus security program to reduce police protection service; and (6) the City's proactive safety programs, implemented via SMMC Section 3.68 (Comprehensive Crime Prevention program that addresses crime prevention and law enforcement services, and SMPD review of development projects for the inclusion of design features that facilitate service provision and support public safety). Therefore, Project operation would not create the need for new or physically altered police facilities, the construction of which would result in substantial adverse environmental impacts, in order to maintain acceptable service. Accordingly, impacts would be less than significant.

4.15.4.5 Cumulative Impacts

The geographic setting for the analysis of cumulative impacts to police protection service is the City. Chapter 3.0, *General Description of Environmental Setting*, of this EIR, identifies 112 of the 131 cumulative projects as located in the City. The location of these projects are shown in Figure 3-1, *Cumulative Projects Map*. These cumulative projects, in conjunction with the Project, would generate the need for additional police protection services from the SMPD during construction and operation.

In general, impacts to SMPD services and facilities during the construction of each cumulative project would be addressed as part of each project's development review process conducted by the City. Due to their proximity to the Project, should Project construction occur concurrently with the construction of adjacent or nearby, coordination with these construction sites would be implemented through each project's respective construction management plan, which would ensure emergency access and traffic flow are maintained on adjacent right-of-ways. In addition, construction-related traffic generated by the Project and cumulative projects would not significantly impact SMPD response within the Project vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. For the reasons discussed above, the Project in and of itself would not substantially affect police services during construction. Therefore, the Project's contribution to cumulative impacts during construction on SMPD's emergency response would not be cumulatively considerable.

Similar to the Project, it is expected that the cumulative projects (particularly those of a larger nature) would be subject to review by SMPD on a project-by-project basis to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Many of the cumulative projects would also be expected to provide on-site security, personnel and/or design features for their residents and patrons per standard development practices for the given uses.

As discussed above, in consideration of future growth (inclusive of the Project and the cumulative projects in the City), the SMPD has no known or proposed plans for new facilities or to expand the SMPD Headquarters. The SMPD evaluates the need for improvements and additional staff on an ongoing basis as part of the City's biennial budgeting process. During this budgeting process, the SMPD allocates funds as necessary, towards the City's Capital Improvements Program and SMPD operation costs. Equipment enhancement programs are considered in the context of the City's budget process and available grants.

If the SMPD determines in the future that expanded police facilities and improvements are warranted, the impacts of the construction and operation of such facilities would be analyzed at that time under CEQA as a project independent of the proposed Project. Moreover, the City is highly developed, and the site of a new police station or the expansion of a police station would likely be on an infill lot, with expansions often being less than an acre in size in a highly urbanized area. Accordingly, the need for additional police protection services as part of an unplanned or expanded police station at this time is not an environmental impact of the Project or one that the Project is required to mitigate (Court of Appeal of the State of California, 2015).

Similar to the Project, those cumulative projects in the City would generate revenue (e.g., property and sales tax revenue) for the City's Capital Improvements Program that could be used to fund SMPD expenditures and operation costs as necessary to offset any incremental Project impact on police services. The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City's Capital Improvements Program.

With regard to emergency response, the Project and cumulative projects would introduce new uses which would generate additional traffic in the vicinity of their sites. Traffic from the Project and cumulative projects could have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. As discussed above, the Project is not anticipated to substantially affect existing emergency response in the City and the Project would not significantly contribute to a cumulative impact regarding emergency response. As is the case under existing conditions, emergency vehicles would access the Project Site and each of the cumulative projects directly from the surrounding roadways. The drivers of emergency vehicles have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, emergency access to the Project vicinity would be maintained at all times, and the increase in cumulative traffic generated by the Project and cumulative projects would not significantly impact emergency vehicle response times to the Project vicinity, including along designated disaster routes. Further, consistent with the *City of Hayward v. Trustees of California State University* (Court of Appeal of the State of California, 2015), significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area a project, and potential impacts on emergency response are not an environmental impact that CEQA requires a project to mitigate. Furthermore, the Project is a hospital improvement and healthcare development project that would improve emergency services and response for the general community.

Based on the above considerations, the Project would not make a cumulatively considerable contribution to the need for the construction of new, or expanded police facilities and, as such, cumulative impacts on police protection services would be less than significant.

4.15.5 Mitigation Measures

Project impacts would be less than significant with implementation of the proposed security features and regulatory compliance. No mitigation measures are required.

4.15.6 Level of Significance After Mitigation

No mitigation measures are required; impacts would be less than significant.

4.16 Public Services – Fire Protection

4.16.1 Introduction

This section analyzes Project's potential construction and operational impacts on fire protection services and facilities in the City. The analysis addresses whether the Project's impacts to fire protection services and facilities, response times, emergency access, water infrastructure, and fire flow (i.e., water available for firefighting) would require the need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts. The analysis is based on information provided by the City, primarily the Santa Monica Fire Department (SMFD), and the Fire and Domestic Water Study, prepared for the Project by KPFF Consulting Engineers, dated August 2018. The information provided by the City is contained in Appendix K of this EIR. The Fire and Domestic Water Study is contained in Appendix M of this EIR.

4.16.2 Environmental Setting

4.16.2.1 Existing Conditions

SMFD Fire Protection Services

Fire prevention, fire suppression, life safety, and emergency medical services within the City are provided by the SMFD. The SMFD is a full-spectrum life safety agency that is dedicated to preventing the loss of life, property, and the environment from fire, medical, and other natural or man-made disasters through aggressive prevention, training, public education, and emergency response. The SMFD provides fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. If needed, additional assistance is provided by the Los Angeles City Fire Department through a mutual aid agreement. The Los Angeles Fire Department routinely assists the SMFD by responding to large-scale emergencies as needed.

The SMFD maintains an Insurance Services Office (ISO) Class 1 rating.[1] It has also been accredited as a Local Fire Academy (ALA) in the State Fire Training System.

The SMFD has a comprehensive and active Fire Prevention program, including a Fire Prevention division dedicated to this effort. The SMFD is responsible for enforcement of the City's Fire Code through project review and structural inspections prior to occupancy for all public facilities and private properties. During the plan check process, the SMFD reviews a project's site plans and building plans to ensure that new buildings are designed to provide adequate emergency access and have incorporated Fire Code requirements. As a next step, the SMFD inspects new prior to issuance of Certificate of Occupancy to ensure that require fire protection safety features are implemented in accordance with the Fire Code and SMFD requirements. To provide for the maximum protection of life and property to the extent feasible, the Fire Code includes stringent fire prevention and fire

[1] The ISO rating is from 10 to 1 with "1" being the best. Historically very few cities received a "Class 1" rating. There have been times when only one City in the nation, would receive a "1" rating; currently there may be as many as 40+ cities with a "1" rating in the U.S." (www.FireServiceInfo.com, 2016). Accessed February 8, 2016. The Cal Fire accreditation letter, and information regarding the ISO rating are included in Appendix K of this EIR.

suppression requirements in new buildings. After construction, fire and life safety requirements are regularly enforced through annual building inspections conducted by the Fire Prevention Division.

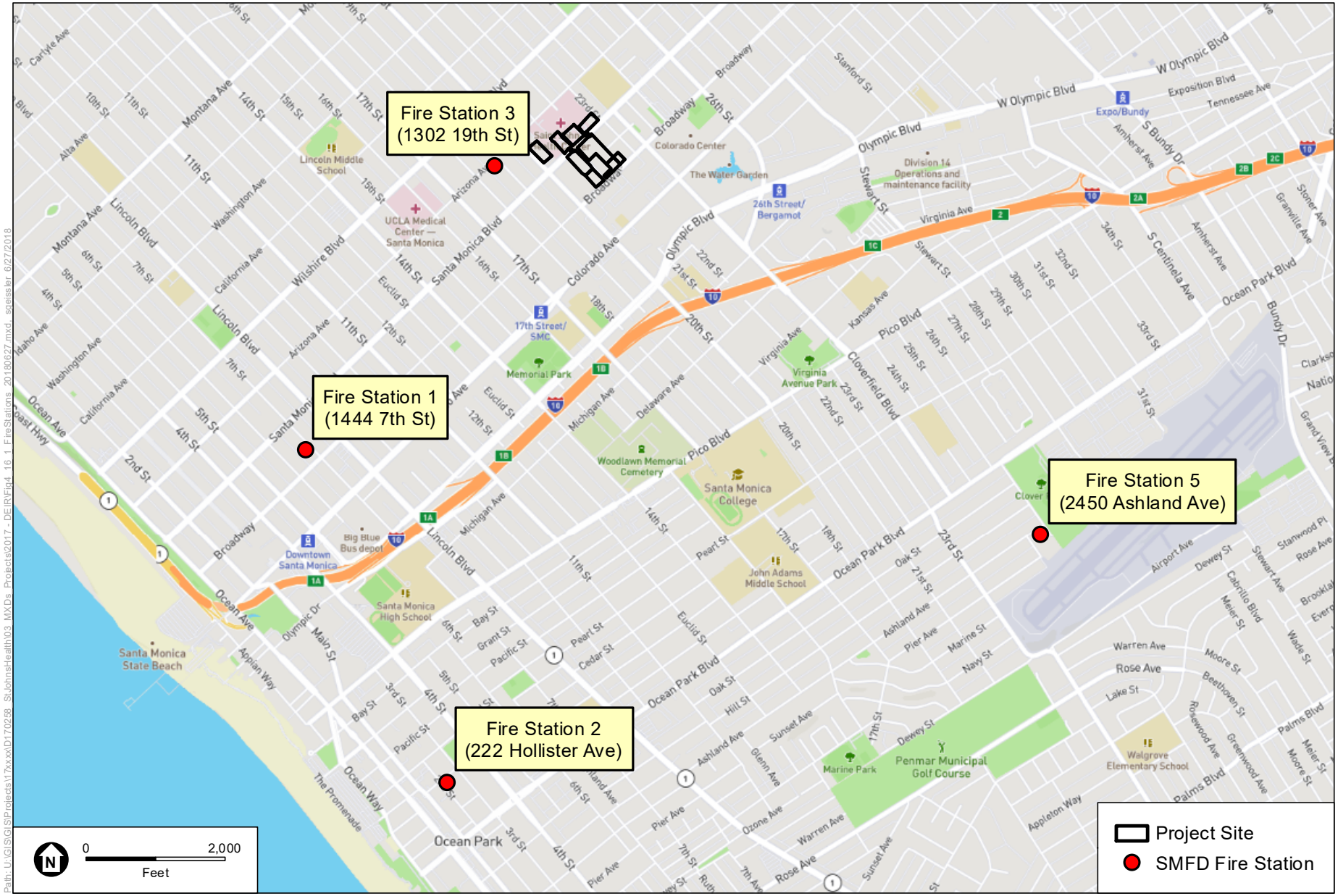
The SMFD is also the City's Certified Unified Protection Agency (CUPA) providing hazardous materials response and remediation. The Fire Prevention Division of the SMFD regulates above ground and underground storage tanks and conducts other hazardous materials site inspections through the Assistant Fire Marshal and the City's CUPA program.

As an additional fire prevention effort, the City's Office of Emergency Management offers free emergency preparedness and response training to residents over the age of 18 through their Community Emergency Response Team (CERT) program. CERT encourages community volunteers to complete a federally recognized training course taught by local Public Safety Personnel and First Responders. Students learn how to prepare for emergencies and be ready to respond to assist the community immediately following incidents of all sizes. The CERT program includes a range of emergency preparedness and response topics, including training on disaster preparedness and fire safety. This program both trains local residents to aid in a disaster as well as educates these community members in fire safety planning, helping to reduce the need for fire services in the City.

The SMFD is divided by fire run districts. The Project Site is located within Fire Run District 3E. The SMFD develops and implements programs that help prevent or reduce the magnitude of emergencies and inspects buildings within City limits to enforce fire codes. The SMFD responds to calls for service, including fire mitigation, emergency medical services, urban search and rescue, and emergencies related to hazardous materials. The SMFD provides services for a daytime community of up to approximately 250,000 persons.

SMFD Facilities

As shown in **Figure 4.16-1**, *Fire Stations Located in the Vicinity of the Project Site*, there are four fire stations that provide fire protection services to the City and the Project Site. **Table 4.16-1**, *Fire Stations Located in the Project Vicinity*, includes the location, distance/direction from the Project Site, and equipment/staffing. As shown in Table 4.16-1, Fire Station No. 3 at 1302 19th Street is located nearest to the Project Site and is the first due fire station, which is the fire station with primary responsibility for the Project Site (City of Santa Monica, 2018c). Fire Station No. 3 is located approximately 0.2 miles west of the Project Site. The other three stations within close proximity of the Project Site include Fire Stations Nos. 1, 5, and 2, located approximately 1.1 miles southwest, 1.7 miles southeast, and 1.8 miles southwest respectively, of the Project Site. The City is currently constructing a new 25,000 square-foot fire station located at 1337-45 7th Street to replace the existing Fire Station No. 1 located at 1444 7th Street. Construction of this new station is anticipated to be completed by March 2020 (City of Santa Monica, 2018a and City of Santa Monica, 2018c). According to the SMFD, beyond the construction of the relocated Fire Station No. 1 (which is due to be complete by March 2020), the SMFD has no known or proposed plans to expand their fire facilities times (City of Santa Monica, 2018c).



SOURCE: OpenStreetMap, 2018.

Providence Saint John's Health Center Phase II Project

Figure 4.16-1
Fire Stations Located in the Vicinity of the Project Site

ESA

TABLE 4.16-1
FIRE STATIONS LOCATED IN THE PROJECT VICINITY

Station No. and Location	Distance/ Direction From Project Site [a]	Equipment/Staffing [c]
Fire Station 3 1302 19th Street, at Arizona Avenue Santa Monica	0.20 miles west (0.30 miles)	1 paramedic engine company (Engine 3) with crew of 4 1 paramedic engine company (Engine 4) with crew of 4 1 hazardous materials response vehicle (Haz Mat 4, with Utility 4) 1 reserve engine
Fire Station 1 1337-45th Street Santa Monica	1.10 miles southwest (1.2 miles)	1 paramedic engine company (Engine 1) with crew of 4 1 paramedic engine company (Engine 6) with crew of 4 1 100' ladder truck (Truck 1) with crew of 5 1 air/light/rescue unit (RU 1) – part of Truck 1 1 command vehicle with a battalion chief (Battalion 1)
Fire Station 5 2450 Ashland Avenue, south of Ocean Park Boulevard at the Airport Santa Monica	1.70 miles southeast (1.90 miles)	1 paramedic engine company (Engine 5) with crew of 4 1 aircraft rescue fire fighting vehicle (CR5) 1 reserve engine 1 reserve ladder truck
Fire Station 2 222 Hollister Avenue, at 2nd Street Santa Monica	1.80 miles southwest (2.5 miles)	1 paramedic engine company (Engine 2) with crew of 4 1 urban search and rescue vehicle (USAR 2) 1 reserve engine

[a] Approximate distance/direction from Project Site in miles is a straight line distance. Approximate drive distance is shown in parenthesis.

SOURCE: Rachel Kwok, Environmental Planning, City of Santa Monica, correspondence dated May 14, 2018 (Appendix K to this Draft EIR); City of Santa Monica Fire Department Website, Fire Station Information, https://santamonicafire.org/Content.aspx?id=7390, accessed June 2018.

Response Times

In 2017 (most recently available data), the SMFD responded to 14,949 service calls Citywide (City of Santa Monica, 2018b). Of the total incidents, the majority were emergency medical incidents.

As discussed above, the Project Site is located within Fire Run District 3E. **Table 4.16-2**, *SMFD Fire Run District 3E Response Times (2017)*, provides the SMFD operational response times for emergency medical services (EMS) and fire incidents in 2017. Fire Run District 3E had a total of 712 EMS incidents and 906 fire incidents. The National Fire Protection Association (NFPA) 1710 standards for EMS incidents includes a turnout time of 60 seconds with a total response time of five minutes and for fire incidents, a turnout time of 80 seconds with a total response time of 5 minutes and 20 seconds (5:20 minutes). Of the 712 EMS incidents, 534 of those incidents (approximately 75 percent) were five minutes or less. Of the 906 fire incidents, 675 of those incidents (approximately 75 percent) were 5:20 minutes or less. However, the SMFD does not have a set target for response time. The SMFD's goal is to improve or maintain response times (City of Santa Monica, 2018c).

TABLE 4.16-2
SMFD FIRE RUN DISTRICT 3E RESPONSE TIMES (2017)

SMFD Operational Response Times[a]	EMS (712 incidents)	Fire (906 incidents)
Average Call Processing Time:	1:00 minutes	1:00 minutes
Average Turnout Time:	5:04 minutes	5:00 minutes
Average Travel Time:	2:23 minutes	2:23 minutes
Average Response Time:	3:13 minutes	3:16 minutes

EMS = emergency medical services; PPE = personal protective equipment.

Notes: S

[a] SMFD Operational Response Time: the time interval that starts when first contact is made (either through 911 or the fire dispatch center) and ends when the first standard unit arrives on-scene. Call Processing Time = the time interval that starts when the call is created in the computer aided dispatch (CAD) system by a Fire Dispatcher until the initial fire or EMS unit is dispatched. Turnout Time = the time interval between the activation of station alerting devices to when first responders put on their PPE and are aboard apparatus and en-route (wheels rolling). Both station alarm and en-route times are required to measure this for each unit that responds. Travel Time = the time interval that begins when the first unit is en-route to the incident and ends upon arrival of any of the units first on scene. This requires one valid en-route time and one valid on-scene time for the incident. Travel time can differ considerably amongst stations. Many factors, such as traffic, topography, road width, public events and unspecified incident locations, may impact travel time. Standard Unit = a unit with the capacity or equipment to administer the full suite of lifesaving services. Other units are only deployed in special circumstances and lack either the capacity or equipment to deliver the full suite of lifesaving services. Data available from January 1, 2017 through December 31, 2017 (the most recently available).

SOURCE: SMFD correspondence dated May 14, 2018 (Appendix K to this EIR); City of Santa Monica Fire Run Districts Map (Appendix K to this EIR); Response Times By District, Santa Monica Fire Department, dated January 1, 2017 – December 31,2017, date generated May 22, 2018 (Appendix K to this EIR).

Emergency Access

As a major healthcare and emergency medical provider with a 24-hour hour emergency hospital, PSJHC is an important destination for emergency responders. The access driveway for emergency vehicles only to the Hospital's emergency room is provided off of Arizona Avenue. As shown on Figure 4.16-1, the various development areas of the Project Site are accessible to emergency vehicles from Santa Monica Boulevard, Broadway, 20th Street, 21st Street, and 23rd Street.

Mutual Aid Agreements

The foundation of Californian's emergency planning and response is a statewide mutual aid system, which is designed to ensure that adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources are inadequate to cope with a given situation. The California Emergency Services Act mandates the use of the California Disaster and Civil Defense Master Mutual Aid Agreement (MMAA) as the standard form of agreement between jurisdictions. The MMAA creates a formal structure wherein each local jurisdiction retains control of its own facilities, personnel, and resources but may also receive or render assistance to/from other jurisdictions within the state.

There are six mutual aid regions in California. Santa Monica is located in Region I – the Office of Emergency Services Southern Administrative Region, Area A (City of Santa Monica 2016a). The SMFD has an Automatic Aid agreement with the Los Angeles City Fire Department which authorizes the exchange of resources on an as-needed basis.

The SMFD can also call on other agencies for support, including state and federal agencies involved in fire hazard mitigation, response such as the Office of Emergency Services, the U.S. Forest Services, and in extreme cases, the Department of Defense.

Water Infrastructure/Fire Flow for Firefighting Services

Fire flow is the amount of water required at a specified residual pressure in order to control and extinguish a fire. Fire flows are supplied by the same water mains as the domestic water systems including the lines in local streets and major roadways. In general, fire flow requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). The required fire flow requirements from the City of Santa Monica can range from 1,500 gallons per minute (gpm) up to 8,000 gpm, depending on the type of construction build. Requirements for fire hydrant spacing and type of hydrant also vary by type of land development. Pursuant to Fire Code Section 507.5, must be a distance of 400 feet between hydrants on roads and fire lanes.

The City provides water to the Project Site through a series of municipal water lines located in the surrounding streets and by water laterals between these lines and the existing on-site uses. The existing water infrastructure in the vicinity of the Project Site is shown in Figure 4.18-1, *Existing Water Infrastructure,* of Section 4.18, *Water Supply*, of this Draft EIR. As indicated therein, there are nine municipal water lines in the surrounding streets, including:

- 8-inch lines in 20th Street, Arizona Avenue, Broadway, and 23rd Street;
- 12-inch lines in Santa Monica Boulevard, Broadway, and 21st Street; and
- 24-inch lines in Arizona Avenue and Broadway.

The Project Site is currently served by water service laterals connected to the 8-inch water line in 20th Street and the 12-inch water lines in 21st Street, Santa Monica Boulevard and Broadway (KPFF, 2018).

The Project Site is served primarily by four fire hydrants located on 20th Street (Fire Hydrant 629), Santa Monica Boulevard (Fire Hydrant 823), 21st Street (Fire Hydrant 830), and Broadway Street (Fire Hydrant 831). There are an additional 17 fire hydrants located adjacent to the Project Site that are available to provide additional capacity for fire services. Four fire hydrants are located on the north side of Arizona Avenue, one on the west side of 20th Street, two on the west side of 23rd Street, three on the north side of Santa Monica Boulevard, two on the south side of Santa Monica Boulevard, two on the west side of 21st Street, and three on the south side of Broadway Street. Fire Hydrant 629 has a total available flow of 2,717 gallons per minute (gpm) at 80 pounds per square inch (psi) or 7,149 gpm at 20 psi. Fire Hydrant 823 has a total available flow of 2,468 gpm at 85 psi or 5,447 gpm at 20 psi. The total available flow for Fire Hydrant 830 is 1,921 gpm at 85 psi or 4,240 gpm at 20 psi. Fire Hydrant 831 has 2,353 gpm at 82 psi or 5,711 gpm at 20 psi for total available flow (KPFF, 2018).

4.16.3 Regulatory Framework

4.16.3.1 Federal

Uniform Fire Code

The Uniform Fire Code includes specialized technical fire and life safety regulations which apply to the construction and maintenance of buildings and land uses. Topics addressed in the Code include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings.

4.16.3.2 State of California

2016 California Fire Code

The 2016 California Fire Code (CFC), California Code of Regulations (CCR) Title 24 (California Building Code [CBC]), Part 9, is a compilation of building standards, including fire safety standards for residential and commercial buildings. CBC standards are based on building standards that have been adopted by State agencies without change from a national model code; building standards based on a national model code (Uniform Fire Code) that have been changed to address particular California conditions; and building standards authorized by the California legislature, not covered by the national model code. The CFC is part of the CBC.

The CFC establishes statewide standards for fire protection, as well as regulations regarding the mitigation of fire explosion hazards, management and control of the storage, handling and use of hazardous materials and devices, mitigation of conditions considered hazardous to life and assistance to emergency response personnel. Fire standards that pertain to development address such topics as: criteria for the installation of sprinklers; fire resistance standards for fire doors, building materials, and particular types of construction.

Appendix C, Fire Hydrant Locations and Distribution, focuses on the location and spacing of fire hydrants for fire-fighting operations. This appendix uses a methodology based on the required fire flow that fire departments can work with to set a policy for hydrant distribution around new buildings and facilities in conjunction with Section 507.5, Fire Hydrant Systems.

California Health and Safety Code

State fire regulations set forth in Section 13000 et seq. of the California Health and Safety Code, address building standards, fire protection and notification systems, provision of fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

California Emergency Management Agency

The California Emergency Management Agency (CalEMA) was established as part of the Governor's Office on January 1, 2009, and created by Assembly Bill (AB) 38, which merged the duties, powers, purposes, and responsibilities of the former Governor's Office of Emergency Services with those of the Governor's Office of Homeland Security. CalEMA is responsible for

the coordination of overall state agency response to major disasters in support of local government. The Agency is responsible for assuring the state's readiness to respond to and recover from all hazards – natural, manmade, ware-caused emergencies and disasters – and for assisting local governments in their emergency preparedness, response, recovery, and hazard mitigation efforts.

California Code of Regulations, Title 19.

CCR Title 19, Chapters 1 through 6, establishes regulations related to emergency response and preparedness.

4.16.3.3 Regional

Westside Council of Governments Emergency Preparedness/Mutual Aid Plan

The Westside Council of Governments Emergency Preparedness/Mutual Aid Plan was developed and adopted by the Westside Council of Governments (WCOG) for the purpose of protecting the cities of Santa Monica, Beverly Hills, Culver City, and West Hollywood from disasters related to homeland security and terrorism. The key component of the plan encourages and establishes inter-agency cooperation. It also sets forth coordinated disaster training and preparedness activities.

4.16.3.4 Local

Santa Monica Safety Element

The Safety Element of the Santa Monica General Plan identifies specific policies associated with fire protection services. Goal 4 of the Safety Element is to "reduce threats to public safety and minimize property damage from fire hazards commensurate with the risk of post-earthquake fires and fires driven by Santa Ana winds." This goal addresses the implementation of development standards pertaining to new development. Policies that support this goal are as follows:

- **Policy 4.1:** The City shall develop and enforce construction and design standards that ensure that proposed development incorporates fire prevention features by strengthening performance review and code enforcement programs.
- **Policy 4.2:** The City shall reduce existing developments to tolerable levels of risk and strengthen the city firefighting capability to respond to multiple fire incidents caused by an earthquake, Santa Ana winds, or other extraordinary circumstances.
- **Policy 4.3:** Conduct and implement long-range fire safety planning to cope with increasing urban density caused by new development, redevelopment, and property infilling, including development of stringent Building or Fire Municipal Code standards, improved infrastructure, and improved mutual aid agreements with the private and public sector.

City of Santa Monica Municipal Code

Section 8.40.010 of the Santa Monica Municipal Code (Municipal Code) adopts Title 24, Part 9 of the CCR, also known as the CFC, 2016 Edition, as the Fire Code of the City of Santa Monica. The City provides local amendments to the CFC to include additional requirements related to address numbers, fire watch, and seizure of fireworks. The current Fire Code standards and SMFD requirements are intended to provide for the maximum protection of life and property to the extent feasible, and include stringent requirements addressing fire prevention and fire suppression for new buildings. Fire Code requirements play an important role in minimizing the risk of fires and

preventing property loss, injury, and death. Minimum requirements as required by the Fire Code include, but are not limited to: installation of fire alarms, fire sprinklers, and fire communication systems; the use of more fire resistant building materials; and the provision of adequate emergency access, fire hydrants, visible address signage, and minimum fire flow rates for water.

4.16.4 Environmental Impacts

4.16.4.1 Thresholds of Significance

Appendix G of the State CEQA Guidelines provides a screening question that address potential impacts related to fire protection services. The question related to fire protection services is listed below and is used as the significance thresholds by the City in this section. The CEQA guidelines provides that lead agencies may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects, and the use of Appendix G as a significance threshold is routinely sanctioned by the courts (although such use is not mandatory).

Would the project:

a) 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 fire protection services.

4.16.4.2 Methodology

Fire protection service needs relate to the size of the population and geographic area served, the number and types of calls for service, and the land use characteristics and operations of the Project that could potentially increase fire risk (such as the use or storage hazardous materials or inadequate fire flow). Changes in these factors resulting from the Project may increase the demand for services. The estimated population and employment generated by the Project that would contribute to the demand for fire protection services is calculated in Section 4.14, *Population and Housing*, of this EIR.

Project impacts regarding fire protection services are evaluated in consultation with the SMFD, which reviews, on a project-by-project basis, each proposed project's land use type, fire-related needs, whether the project site meets the recommended response distance and fire safety requirements, and project design features that would reduce or increase the demand for fire protection services.

Beyond the standards included in the Fire Code, consideration is given to the size of the Project, uses proposed, fire flow necessary to accommodate the Project, response distance for engine and truck companies, fire hydrant sizing and placement standards, and access. The analysis is based, in part, on information provided by both the City and the SMFD and on the Fire and Domestic Water Study, prepared for the Project by KPFF Consulting Engineers, dated August 2018. The information provided by the City and SMFD is contained in Appendix K of this EIR. The Fire and Domestic Water Study is contained in Appendix M of this EIR.

Based on these factors, a determination is made as to whether the SMFD would require a new or physically altered facility to maintain acceptable service levels, the construction of which could result in a potentially significant environmental impact.

For a discussion of the Project's potential impacts related to emergency access, please see Section 4.17, *Transportation/Circulation*.

4.16.4.3 Project Characteristics

The Project would be designed to comply with all applicable federal, state, and local regulations governing the provision of fire protection services, including adequate fire access, number of hydrants and fire flow availability.

Preliminary site plans of the Project have been reviewed by the SMFD to ensure adequate emergency access, including the provision of sufficient turning radii, distance to building, and width of new streets, etc. The Project has been designed to specifically address SMFD comments. This includes the provision of an emergency fire lane between the South Campus East Driveway and the Southeast Driveway as well as removable bollards or other similar access control devices for the west end of Schader Drive.

Furthermore, new buildings constructed as part of the Project will be subject to OSHPD or SMFD review to ensure compliance with life safety requirements. OSHPD regulates the design and construction of healthcare facilities to ensure that they are safe. Specifically, the OSHPD will have jurisdiction over and will plan check any acute care/inpatient facilities [potentially, the West Ambulatory & Acute Care Building (2C) or the East Ambulatory & Acute Care Building (2D/E)]. Additionally, with respect to Phase II buildings with ambulatory care uses [potentially, the West Ambulatory & Acute Care Building (2C), East Ambulatory & Acute Care Building (2D/E), West Ambulatory Care & Research Building (S3), Education & Conference Center and East Ambulatory Care & Research Building (S4), and 20th Street Medical Building (2I)], there may be some clinics within these buildings that will be designed to OSHPD criteria. If the City cannot do the plan check for these buildings, then OSHPD will conduct the plan check.

The following buildings will be subject to the City's Building and Safety and SMFD review:

- Child and Family Development Center (S1)
- Multi-family Housing (S2)
- Visitor Housing (S5)
- Mullin Plaza Café
- Saint John's Café

For projects subject to SMFD review, as part of the final building permit process, building design and site plans would be further evaluated and approved by the SMFD prior to the issuance of a certificate of occupancy. SMFD review would ensure incorporation of required fire protection safety features as required by the Fire Code, including but not limited to building sprinkler systems,

adequacy of on-site emergency access, fire-resistant building materials, adequacy of fire flow, and communication systems.

During operations, smoking will continue to be prohibited at the PSJHC Campus, including within the new Phase II buildings. Where oxygen is present in any of the new buildings, special regulations are applicable to prevent fire risks. The PSJHC also conducts fire and disaster drills regularly to practice fire protection response and safety.

4.16.4.4 Project Impacts

Threshold Fire-1: *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?*

Impact Statement FIRE-1: The Project would increase the number of visitors and employees using the Project Site which would increase demand for fire protection services. The increase in demand for fire protection would be off-set through proposed water infrastructure improvements, fire prevention features, and regulatory compliance. Thus, the Project would not require new or physically altered fire protection service facilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant.

Construction

Project construction activities associated with the demolition of the existing on-site structures and the construction of buildings could potentially temporarily increase the risk of accidental fires. Such risks would occur as a result of the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in flammable materials and coatings. However, in compliance with the Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, Project construction managers and personnel would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction vehicles would be maintained on-site. Additionally, Project construction would comply with applicable existing codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials.

Based on the above, Project construction would not require new or physically altered fire facilities to maintain adequate fire response times, the construction of which could cause significant environmental impacts. Accordingly, impacts would be less than significant.

Operation

Fire Risks

Consistent with existing PSJHC operations, Project operations would involve the transport, use, storage and disposal of small quantities of hazardous materials for building and landscape maintenance such as cleaning solvents, painting supplies, pesticides, and diesel (for the emergency

generator). Additionally, the operation of the Project's medical and laboratory uses would continue to include the transport, use, storage and disposal of hazardous materials such as biological agents and chemicals, and would continue to generate small quantities of hazardous waste such as "sharps" containers, pharmaceutical waste, chemo waste, and pathological waste, at the Project Site. Some of these hazardous materials may be flammable. Oxygen tanks may also be located within some of the medical/health care buildings. However, the transport, use, storage and disposal of hazardous materials during Project construction and operation, would occur in accordance with PSJHC health and safety policies and protocols as well as applicable federal, state and local health and safety regulations (e.g., RCRA and HWCA "cradle to grave" requirements, OSHA workplace and work practices requirements, City HMRRP/HMMP requirements, etc.) which have been formulated to avoid the exposure of persons and the environment to hazardous materials. The risk of fire would not significantly increase from existing conditions.

SMFD Fire Protection Services, Facilities, and Response Times

According to Section 4.14, *Population and Housing*, of this EIR, the Project would introduce a net increase of an estimated 19 residents, up to 64 short term guests/visitors and 646 employees to the Project Site that would potentially result in an increase the demand for fire protection services and emergency medical services. The adequacy of fire protection and emergency medical services for a given area is based on response distance from existing fire stations, required fire-flow, and the SMFD's assessment of station capacity to respond to incidents in the area.

As previously discussed, Fire Station No. 3 is located nearest the Project Site and would be the first due station to respond to an emergency. Additional back up response is provided by Fire Station Nos. 5 and 2, as well as Fire Station No. 1 once the new facility is constructed and in operation. As indicated in Table 4.16-1, Fire Stations Nos. 1, 5, and 2, located approximately 1.1 miles southwest, 1.70 miles southeast, and 1.80 miles southwest respectively, of the Project Site. As discussed above, the Project Site is located within Fire Run District 3E which meets both the NFPA 1710 standards for EMS incidents and fire incidents 75 percent of the time. However, the SMFD does not have a set target for response time. The SMFD's goal is to improve or maintain response times.

The Project-related increase in traffic within the Project Site and on surrounding roadways could potentially affect emergency response in the area. However, a number of factors would operate to facilitate responses to emergency calls. Emergency response is a routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in lanes of opposing traffic, use of alternative routes, and multiple station response. The Project vicinity is well served by the nearby fire station (Fire Station No. 3) as well as three other fire stations within 2.5 miles of the Project Site. Also, these fire stations have access to multiple routes to respond to emergency calls. There are a number of additional factors that influence emergency response times in addition to traffic, including alarm transfer time, alarm answering and processing time, mobilization time, risk appraisal, signals, and roadway characteristics. Nonetheless, based on the ability of SMFD to respond to emergency situations, the number, proximity, and accessibility of fire stations in the Project vicinity, SMFD emergency response times would not be adversely affected by the Project. Regardless, consistent with *the City of Hayward v. Trustees of California State University* (Court of Appeal of the State of California, 2015), significant impacts under CEQA consist of adverse

changes in any of the physical conditions within the area, and potential impacts on emergency response times are not an environmental impact that CEQA requires a project to mitigate.

During the plan check phase for each building, Saint John's would be required to submit construction plans of Phase II development to the SMFD and any other agencies with jurisdiction over fire safety issues for approval. New buildings would be required to meet Fire Code or other applicable code requirements, including those related to street width, water supply, and alarm systems. The Project's design would include fire resistant doors and materials, as well as walkways, stairwell and elevator systems (including emergency and fire control elevators) that meet applicable requirements. The Project's fire safety features would include the installation of automatic sprinkler systems, smoke detectors and appropriate signage and internal exit routes to facilitate a building evacuation, if necessary; as well as a fire alarm system, building emergency communication system and smoke control system. As part of the overall PSJHC, all new buildings would continue to participate in the Hospital's existing emergency plan programs and procedures, which include regular fire and disaster drills.

As required by the SMMC: (1) all driveways, and new/reconfigured streets would be completed to the satisfaction of the SMFD prior to issuance of building permits; (2) SMFD approval of plot plans showing fire hydrants and access for each phase of the Project would be required prior to the recording of the final map for that phase; and (3) Saint John's would be required to consult with the Fire Department on the proposed development and facility design. Each building would also be required to comply independently with applicable requirements. Specifically, the Office of Statewide Health Planning and Development (OSHPD) Facilities Development Division (FDD) reviews and approves all plans and specifications for the construction, alteration, and addition to healthcare related buildings, and observes activities to ensure compliance with the provisions of the CBC. This includes plan review of the design details of the architectural, structural, mechanical, plumbing, and electrical systems. All other buildings would be subject to City requirements, including SMFD requirements.

With incorporation of applicable regulatory requirements (i.e., building design, fire safety features, emergency safety provisions, SMFD access, construction measures, water system improvements (discussed below), and plot plan review, the Project is not expected to result in a substantial increase in demand for additional fire protection and emergency medical services that would exceed the capability of the SMFD to serve the Project such that it would require construction of new fire facilities. Beyond the construction of the new Fire Station No. 1 (which is currently under construction), the SMFD has indicated that there are no proposed plans to build or expand their facilities are necessary as a result of the Project.

Therefore, with compliance with applicable regulations, Project operation would not create the need for new or physically altered fire protection services or facilities, the construction of which would result in substantial adverse environmental impacts, in order to maintain acceptable service. Accordingly, impacts would be less than significant.

Water Infrastructure/Fire Flow for Firefighting Services

As described in the Existing Conditions section above, the Project Site is currently served by water service laterals connected to the 8-inch water line in 20th Street and the 12-inch water lines in 21st Street, Santa Monica Boulevard and Broadway. The Project Site is served primarily by four fire hydrants located on 20th Street (Fire Hydrant 629), Santa Monica Boulevard (Fire Hydrant 823), 21st Street (Fire Hydrant 830), and Broadway Street (Fire Hydrant 831). There are an additional 17 fire hydrants located adjacent to the Project Site that are available to provide additional capacity for fire services.

Fire Hydrant 629 is projected to serve the proposed Building 2I. Building 2I is proposed to be fully equipped with sprinklers. The total available flow of Fire Hydrant 629 is 2,717 gallons per minute (gpm) at 80 pounds per square inch (psi) or 7,149 gpm at 20 psi. The domestic water demand for proposed Building 2I is approximately 44,510 gallons per day (gpd) or 30.91 gpm. According to the Fire and Domestic Water Study, the required fire flow demand for building 2I would be at minimum of 2,750 gpm at 20 psi. Based on the flow report and Project demands using 2016 California Fire Code for Type IA construction, the existing available water flow and pressure is adequate to serve the proposed development. However, using a more conservative approach based on Appendix C, Fire Hydrant Locations and Distributions, of the CFC, to meet a fire flow demand of 3,000 gpm, three fire hydrants are required to serve this area. Currently, an existing fire hydrant services the existing building. As such, two additional fire hydrants would be required to adequately service the proposed Building 2I (KPFF, 2018).

Fire Hydrant 823 is projected to serve the proposed Buildings 2C, 2D, 2E, and S4. Buildings 2C, 2D, and 2E are proposed to be fully equipped with sprinklers. The total available flow for Fire Hydrant 823 is 2,468 gpm at 85 psi or 5,447 gpm at 20 psi. The domestic water demand for the proposed Buildings 2C, 2D, 2E, and S4 is approximately 403,555 gpd or 280.25 gpm. According to the Fire and Domestic Water Study, using 2016 California Fire Code for Type I-A construction, the required fire flow demand for these buildings would a minimum of 3,000 gpm at 20 psi. Based on this demand, the existing available water flow and pressure is adequate to serve the proposed development. However, using a more conservative approach based on Appendix C of the CFC, to meet a fire flow demand of 3,000 gpm, three fire hydrants are required to serve this area. For additional capacity, it may be possible to utilize other fire hydrants on Santa Monica Boulevard that are in proximity of Building 2C. However, if the coverage of the buildings is not achieved through the existing fire hydrants, additional hydrants would be required (KPFF, 2018).

Fire Hydrant 830 is projected to serve the proposed Buildings S1 and S3 which are proposed to be fully equipped with sprinklers. The total available flow for Fire Hydrant 830 is 1,921 gpm at 85 psi or 4,240 gpm at 20 psi. The domestic water demand for proposed Buildings S1 and S3 is approximately 116,572 gpd or 80.95 gpm. Similar to above, the required fire flow demand for these buildings would be minimum of 3,000 gpm at 20 psi using 2016 California Fire Code for Type IA construction. Based on this demand, the existing available water flow and pressure is adequate to serve the proposed development. However, using a more conservative approach based on Appendix C of the CFC, for a fire flow demand of 3,000 gpm, three hydrants are required to service this area. Currently, one fire hydrant exists to service the two buildings. As such, two additional fire hydrants

will be required to service the proposed buildings which may be located along the proposed 20th Place for the additional capacity (KPFF, 2018).

Fire Hydrant 831 is projected to serve the proposed buildings S5 and S2. Buildings S5 and S2 are proposed to be fully equipped with sprinklers. The total available flow for Fire Hydrant 831 is 2,353 gpm at 82 psi or 5,711 gpm at 20 psi. The domestic water demand for proposed buildings S5 and S2 is approximately 20,470 gpd or 14.22 gpm. According to the Fire and Domestic Water Study, using 2016 California Fire Code for Type I and Type V construction, the required fire flow demand for these buildings would a minimum of 1,375 gpm at 20 psi. Based on the flow report and Project demands, the existing available water flow and pressure is adequate to serve the proposed development. However, based on Appendix C of the CFC, for fire flow demand of less than 1,750 gpm, one fire hydrant is required to service the building. Thus, the existing fire hydrant is adequate to serve the aforementioned buildings (KPFF, 2018).

Overall, the Project's fire flow would be in compliance with the requirements of the City's Fire Code and subject to the review and approval by the SMFD. Furthermore, the Project would be required to meet all applicable codes, including those related to water supply. Further, per Section 7.12.090, Water Capital Facility Fee, of the City's Municipal Code, the owner or developer of a building shall pay a water capital facility fee to the City. This fee shall be paid before the issuance of the next permit or certificate required in the course of development or occupancy of the building. Fire service installations are subject to this fee and, if necessary, specific off-site improvements may be required by the Utilities Manager to provide the necessary fire service water flow capacity to the building. As the Project would be designed in compliance with applicable regulatory requirements of the Fire Code and subject to review and approval by the SMFD, Project impacts with respects to fire flow requirements would be less than significant.

Therefore, with regulatory compliance, Project operation would not require the need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable fire flow service. Accordingly, impacts would be less than significant.

4.16.4.5 Cumulative Impacts

The geographic setting for the analysis of cumulative impacts to fire protection service is the City. Chapter 3.0, *General Description of Environmental Setting*, of this EIR, identifies 112 of the 131 cumulative projects as being located in the City. The location of these cumulative projects are shown in Figure 3-1, *Cumulative Projects Map –*. These cumulative projects, in conjunction with the Project, would generate the need for additional fire protection and emergency medical services from the SMFD during both construction and operation.

In general, impacts to SMFD services and facilities during the construction of each of the cumulative projects in the City would be addressed as part of each project's development review process conducted by the City. Although the cumulative demand on SMFD services would increase in the future with buildout of cumulative project, cumulative impacts on fire protection and emergency medical services would be reduced to less than significant through each cumulative project's regulatory compliance and site-specific design and safety features, similar to the Project.

All the cumulative projects in the City are located in a developed, urbanized area within an acceptable distance to one or more existing fire stations. Each project would be subject to the required review by the SMFD for compliance with Fire Code and Building Code regulations related to fire/life safety, emergency response, emergency access, fire flow, and fire safety that would reduce potential impacts to fire protection and emergency services and ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved.

The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services. The SMFD evaluates the need for improvements and increased staffing levels on an ongoing basis as part of its annual budgeting process, with budgets increasing in recent years to keep up with City demand. Specifically, funds are allocated as necessary towards the Capital Improvements Program for the purchase of new equipment and/expanded facilities and towards the department's operating budget for new staff. As discussed above for the Project, beyond the construction of the new Fire Station No. 1 (which is under construction), the SMFD has no proposed plans to build or expand their fire facilities at this time. If a new fire station, or the expansion, consolidation, or relocation of a station was determined to be warranted by SMFD, the impacts of the construction and operation of such a station would be analyzed at that time under CEQA as a project independent of the proposed Project. Accordingly, the need for additional fire protection and emergency medical services as part of an unplanned or expanded fire station at this time is not an environmental impact of the Project or one that the Project is required to mitigate (Court of Appeal of the State of California, 2015). In summary, through the City's regular budgeting efforts, SMFD's resource needs would be identified and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station would be identified through this process, the impacts of which would be addressed accordingly.

Based on the above considerations, the Project would not make a cumulatively considerable contribution to with the need for the construction of new, or expanded fire facilities and, as such, cumulative impacts on fire protection and emergency medical services would be less than significant.

4.16.5 Mitigation Measures

Project impacts would be less than significant with implementation of the proposed fire safety features and regulatory compliance. No mitigation measures are required.

4.16.6 Level of Significance After Mitigation

No mitigation measures are required; impacts would be less than significant.

4.17 Transportation

4.17.1 Introduction

This section analyzes the potential transportation impacts associated with construction and operation of the Project. Issues evaluated include: vehicle miles travelled (VMT), intersection and street segment operation, regional transportation system (e.g., CMP facilities and transit) operation; hazards due to design features; emergency access; and consistency with alternative transportation plans and policies. This section is based a Transportation Impact Analysis (TIA) prepared for the Project by Fehr & Peers (Fehr & Peers 2019), which is included as Appendix L of this EIR.

4.17.2 Environmental Setting

As indicated in Figure 2-1 in Chapter 2, *Project Description*, of this EIR, the Project Site is located in the urbanized City of Santa Monica (City), in the western portion of Los Angeles County. Specifically, the Project Site is located on the Providence Saint John's Health Center (PSJHC) Campus (the Campus), which is located in an area generally bounded by Arizona Avenue to the north, Broadway to the south, 20th Street to the west, and 23rd Street to the east. The greater Campus is bisected by Santa Monica Boulevard, and the Project Site includes various development sites (Phase II development sites) located on both the north and south sides of the Campus.

4.17.2.1 Existing Transportation System

Regional Freeway and Street System

As indicated in Figure 2-1, regional automobile access to the Project Site is provided by the Santa Monica Freeway (I-10), Palisades Beach Road (also known as Pacific Coast Highway and State Route 1), Lincoln Boulevard (SR-1 south of Olympic Boulevard), and the San Diego Freeway (I-405). I-10 provides regional east-west access across the City of Santa Monica to the City of Los Angeles to the east as well as Pacific Coast Highway to the west and connects to the San Diego Freeway (I-405). Access between I-10 and the Project Site is available via interchanges at 20th Street, Cloverfield Boulevard, and Centinela Avenue. Access between I-405 and the Project Site is available via I-10 and interchanges at Santa Monica Boulevard and Wilshire Boulevard.

Local Street Network

As indicated in Figure 2-1, local automobile access to the Campus and the Project Site is provided by Arizona Avenue, Broadway, 23rd Street, and 20th Street which border the Campus and roughly border the Project Site. Local access is also provided by Santa Monica Boulevard which bisects the Campus and the Project Site. Below is a description of the nearby streets surrounding the Project Site:

- Santa Monica Boulevard is an east-west street that provides two travel lanes in each direction and on-street parking provided on one or both sides of the street through most of the study area. Left-turn pockets are present at signalized intersections.
- Broadway is an east-west street with one travel lane and a green-painted bicycle lane in each direction, as well as on-street parking provided on both sides of the street. Left-turn pockets are present at major intersections.

- 20th Street within the study area is a north-south street that provides one travel lane and painted bike sharrows in each direction north of Wilshire Boulevard and two travel lanes and painted bike sharrows in each direction south of Wilshire Boulevard. On-street parking is provided on one or both sides of the street through most of the study area. Right- and/or left-turn pockets are present at major intersections. Raised medians separate northbound and southbound travel lanes at each approach to the signalized Expo Line crossing.
- 21st Street is a one way southbound only street providing one travel lane and on-street parking providing on both sides of the street.
- 23rd Street north of Santa Monica Boulevard is a north-south street providing one travel lane in each direction and on-street parking provided on both sides of the street; south of Santa Monica Boulevard, 23rd Street becomes southbound only with parking on both sides of the street.

Public Transit Services

Santa Monica's Big Blue Bus and the Los Angeles County Metropolitan Transportation Authority (Metro) provide a dense network of public transit service throughout the study area. The Project Site is directly accessible via transit from most of Santa Monica and much of the Los Angeles metropolitan area including Downtown Los Angeles, UCLA/West Los Angeles, Century City, LAX, Venice, Culver City.

The Metro Exposition light rail (Expo LRT) train provides high-frequency rail service (east-west) between downtown Santa Monica and downtown Los Angeles. The Expo LRT began operation in Santa Monica in 2016, connecting Santa Monica through West Los Angeles to Culver City and continuing to downtown Los Angeles. The Expo line runs every 6 minutes during peak periods and every 12 minutes during off-peak periods. The Expo line makes 3 stops in the City of Santa Monica, including the 17th Street/Santa Monica College Station and 26th Street/Bergamot Station and connects with other Metro rail service in downtown Los Angeles. The Project Site is located approximately 9 blocks, or 0.7 mile walking distance, from the 17th Street/Santa Monica College Station of the Exposition Light Rail (Expo) line and approximately 10 blocks, or 0.7 mile walking distance, from the 26th Street/Bergamot Station of the Expo Line. The Expo LRT began operation in Santa Monica in 2016, connecting Santa Monica through West Los Angeles to Culver City and continuing to downtown Los Angeles. The Expo line makes 19 stops, including the 17th Street/Santa Monica College Station and 26th Street/Bergamot Station and connects with other Metro rail service in downtown Los Angeles. The Expo line runs every six minutes during peak periods and every 12 minutes during off-peak periods. A new connecting line along Crenshaw Boulevard is projected to open in 2019 and will provide service south towards LAX and will connect with the Metro Green Line.

Additionally, the following 10 fixed-route bus lines and one on-demand bus service run along the streets in the Project vicinity:

- Big Blue Bus Line 1 (Santa Monica Boulevard) - Line 1 runs from Marina Del Rey and Venice through downtown Santa Monica to UCLA. Service headways of 10 minutes are provided during weekday peak periods and about 15 minutes during weekday off-peak periods and on weekends. The stop closest to the Project Site is at 22nd Street and Santa Monica Boulevard.

- Big Blue Bus Line 2 (Wilshire Boulevard) - Line 2 runs from downtown Santa Monica to UCLA. Service headways of about 15 minutes are provided during weekday peak periods and about 20 minutes during weekday off-peak periods and on weekends. The stop closest to the Project Site is at 20th Street and Wilshire Boulevard.
- Big Blue Bus Line 5 (Olympic Boulevard – Century City) - Line 5 runs from downtown Santa Monica to Castle Heights. Service headways of about 20 minutes are provided during weekday peak periods and about 30 minutes during weekday off-peak periods and on weekends. The stop closest to the Project Site is at Colorado Avenue and Cloverfield Boulevard.
- Big Blue Bus Rapid 10 (Downtown LA Freeway Express) - Rapid 10 provides express service via the Santa Monica Freeway from Santa Monica to downtown Los Angeles. Service headways of about 15 minutes are provided during weekday peak periods and about 30 minutes during weekday off-peak periods. Weekend service is not available. The bus stop closest to the Project Site is at 20th Street and Santa Monica Boulevard.
- Big Blue Bus Line 16 (Wilshire Boulevard/Bundy Drive – Marina del Rey) - Line 16 runs from Sawtelle to Marina del Rey. Service headways of about 30 minutes are provided during weekday peak periods and weekday off-peak periods. Weekend service is not available. The bus stop closest to the Project Site is at 20th Street and Olympic Boulevard.
- Big Blue Bus Line 18 (UCLA – Abbott Kinney – Marina del Rey) - Line 18 runs from UCLA through Downtown Santa Monica to Marina del Rey. Service headways of about 20 minutes are provided during weekday peak periods and approximately 30 minutes during off-peak periods and weekends. The bus stop closest to the Project Site is at 20th Street and Montana Avenue.
- Big Blue Bus Line 41/42 (17th Street Station – Santa Monica College – Montana Avenue) - Lines 41 and 42 offer loop service clockwise and counterclockwise, respectively, on 17th Street and 20th Street between the 17th Street Expo Line Station and the Montana shopping district north of downtown Santa Monica. Service headways of about 15 minutes are provided during weekday peak periods and every 25 or 35 minutes during off-peak periods on both weekdays and weekends. The stop closest to the Project Site is on 20th Street near Arizona Avenue.
- Big Blue Bus Line 43 (Santa Monica College – 26th Street – San Vicente Boulevard) - Line 43 runs from Santa Monica College to Brentwood Park and North of Montana. Service headways of about 30 minutes are provided during weekday peak periods and 40 minutes during weekday off-peak periods. Weekend service is not available. The stop closest to the Project Site is at 26th Street near Santa Monica Boulevard.
- Metro Line 4 / Rapid 704 (Santa Monica Boulevard) - Line 4 provides local service on Santa Monica Boulevard between Santa Monica and Downtown Los Angeles. It serves the study area only during the early morning and late night hours (not during peak hours) with off-peak headways of about 20 minutes. The stop closest to the Project Site is at 20th Street and Santa Monica Boulevard. Line 704 offers limited service on Santa Monica Boulevard between Santa Monica and downtown Los Angeles. Buses run at 10- to 15-minute headways during peak weekday hours. The stop closest to the Project Site is at 20th Street and Santa Monica Boulevard.
- Metro Line 20 / Rapid 720 (Wilshire Boulevard) - Line 20 provides local service on Wilshire Boulevard between Santa Monica and Downtown Los Angeles. It serves the study area only during the early morning and late night hours (not during peak hours) with off-peak headways of about 15 minutes. The stop closest to the Project Site is at 20th Street and Wilshire Boulevard. Line 720 offers limited service on Wilshire Boulevard, continuing to an eastern

terminus in the City of Commerce. Buses run at up to 8-minute headways during peak weekday hours. The stop closest to the Project Site is at 26th Street and Wilshire Boulevard.

- Blue @ night – Blue at Night is an on-demand service provided to and from the 17th Street/SMC Expo Line Station from 8:00 PM – 3:00 AM Friday and Saturday, serving a radius of approximately two miles around the station.

The existing public transit routes in the Project vicinity are shown in **Figure 4.17-1**, *Transit Network in the Project Vicinity*.

Bicycle Facilities

The City of Santa Monica has a dense network of bicycle facilities, including some immediately adjacent to the Project Site, as shown in **Figure 4.17-2**, *Bicycle Network in the Project Vicinity*, and described below. The following streets near the Project Site have marked bicycle lanes separating bicyclists from vehicles:

- 14th Street between Marine Street and San Vicente Boulevard
- 16th Street between Marine Street and San Vicente Boulevard
- 17th Street between Marine Street and San Vicente Boulevard
- Montana Avenue between Ocean Avenue and Centinela Avenue
- California Avenue between Ocean Avenue and 17th Street
- Arizona Avenue between Ocean Avenue and 26th Street
- Arizona Avenue (eastbound only) between 26th Street and Centinela Avenue
- Broadway between 7th Street and Centinela Avenue

Following the alignment of the Expo LRT, the Expo Line Bike Path is located near the Campus and is a dedicated bike path, entirely separating bicyclists and other non-motorized users from vehicles on the street.

In addition to these facilities, the City has recently marked various streets in the Downtown area as shared-vehicle/bicycle lanes and included bicycle detection zones at signalized intersections. These lanes have been painted with “sharrow” markings. The following streets near the Project Site are designated as bike routes with sharrows:

- 16th Street between Montana Avenue and Olympic Boulevard
- 24th Street between Washington Avenue and Arizona Avenue/Santa Monica Boulevard
- Princeton Street between Arizona Avenue and Broadway
- Harvard Street between Broadway and Colorado Avenue
- Stewart Street between Colorado Avenue and Pico Boulevard
- Yale Street between Montana Avenue and Colorado Avenue
- Arizona Avenue between 26th Street and Franklin Street

Additional designated future bicycle routes with shared lane marking are proposed in the City’s 20-Year Bicycle Implementation Plan.

D170258.00

SOURCE: Fehr & Peers, Traffic Impact Assessment for the Providence St. John's Health Center Phase II Project, 2019

Providence Saint John's Health Center Phase II Project

Figure 4.17-1
Transit Network in the Project Vicinity

ESA

D170258.00

SOURCE: Fehr & Peers, Traffic Impact Assessment for the Providence St. John's Health Center Phase II Project, 2019

Providence Saint John's Health Center Phase II Project

Figure 4.17-2
Bicycle Network in the Project Vicinity

ESA

The City also offers the Breeze Bike Share service. This bikeshare program makes several hundred "smart" bicycles available at more than 80 stations citywide including downtown, and in Venice in the City of Los Angeles. These public bikes allow residents, visitors, and employees to ride a bicycle for their local travel needs. Near the Project Site, Breeze Bike Share stations are currently located at 20th Street & Arizona Avenue, 20th Street & Broadway, and Cloverfield Boulevard & Broadway.

Pedestrian Facilities

Sidewalks are present on all the public streets within the study area, including those bordering the Project Site (e.g., Arizona Ave., Santa Monica Blvd., Broadway, 20th St., and 23rd St.). The existing sidewalks adjacent to the Project Site on Arizona Avenue and 20th Street are approximately 5 feet wide. Signalized intersections throughout the study area have marked crosswalks and pedestrian countdown signals, including those adjacent to the Project Site (e.g., Arizona Ave./20th St., Santa Monica Blvd./20th St., Santa Monica Blvd./23rd St., and Broadway/23rd St. intersections). Signalized pedestrian walk signals are either automatic at the intersection or actuated by pedestrians by push-button. All intersections have accessible curb ramps.

Other Transportation Choices (e.g., Shared Mobility Technologies)

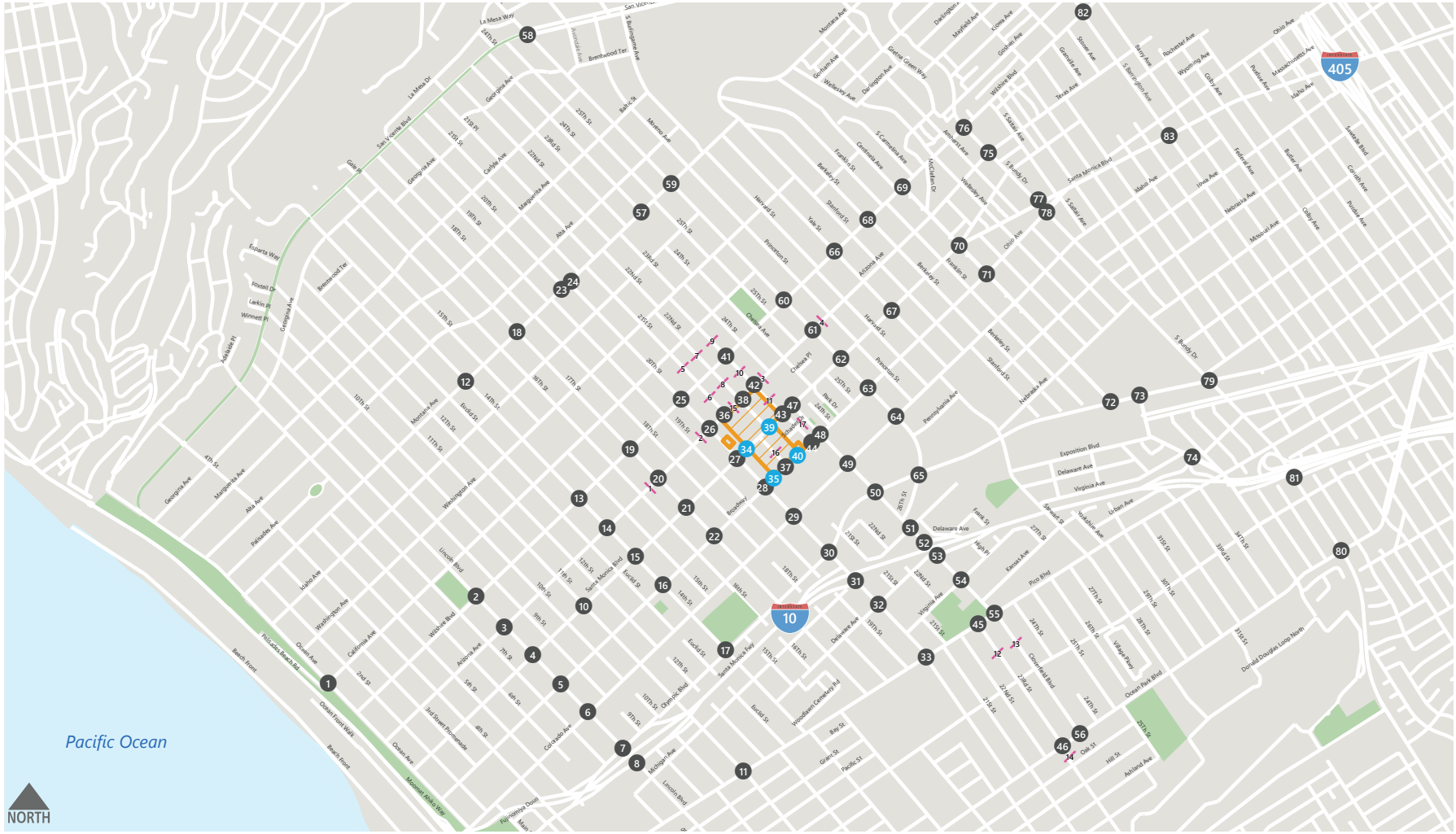
The growth of privately operated Transportation Network Companies (TNCs) like Lyft and Uber has also changed the way people move in and around the City. TNC's provide app-based platforms to connect passengers with drivers who use personal, non-commercial vehicles. Lyft and Uber have become the most recognized and ubiquitous forms of shared mobility.

Additionally, since late 2017, the City has seen the burgeoning of dockless mobility devices, including Bird and Lime electric scooters and bikes, on City streets. These dockless mobility devices have taken off in Santa Monica and the region. Dockless systems allow scooters and bikes to be left in any location. In June 2018 the City adopted new regulations to address safety concerns associated with dockless mobility devices. Their influence is included in existing count data of bicycles, but no assumption of changes to mobility behavior (e.g., reduction in driving) are included in the analysis of future traffic conditions given the new and rapidly changing circumstances and lack of available data. As a result, the traffic analysis presented therein is likely conservative.

4.17.2.2 Existing Traffic Volumes

Study Intersections and Street Segments

In consultation with the City, 83 intersections and 17 street segments were selected for analysis as identified in **Figure 4.17-3**, *Study Intersections and Street Segments*. Of the 83 study intersections, 79 are existing and four are new intersections proposed as part of the Project, with 74 of the existing intersections signalized and five unsignalized but stop-controlled. These intersections and street segments were selected for analysis because they would most likely be impacted by the Project based on their locations on anticipated access routes between the Project Site and surrounding city and region. Of the 83 intersections, 67 are in the City of Santa Monica, 10 are in the City of L.A., and five are shared between the two cities, with the majority classified as Arterial intersections. The lane geometrics and stop controls at the study intersections are identified in Appendix B1 of the TIA.



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SOURCE: Fehr & Peers, Traffic Impact Assessment for the Providence St. John's Health Center Phase II Project, 2019

Providence Saint John's Health Center Phase II Project

Figure 4.17-3
Study Intersections and Street Segments

ESA

Traffic counts for intersections and roadway segments were collected by the City in fall 2016. Counts were collected when school was in normal session during the weekday AM and PM peak periods (7:30-9:30 AM and 4:00-6:00 PM, respectively). The highest one-hour volume in each period at each intersection was selected for analysis. The existing AM and PM peak hour traffic counts at each of the study intersections are included in Appendix B2, and the existing average daily traffic (ADT) traffic volumes at the study street segments are included in Table 4.17-6.

4.17.2.3 Existing Intersection Operations

Intersection operations are analyzed at the 79 existing study intersections identified in Figure 4.17-3 above. Baseline operating conditions at each of the intersections was determined by taking the traffic counts (discussed above) and evaluating the resulting LOS at the intersections (discussed below).

Level of Service (LOS) Methodology

LOS measures vehicle delay at intersections and on roadways. LOS is a method for characterizing the operational conditions at an intersection generally accounting for measures such as speed, delays, travel time, freedom to maneuver, traffic interruptions, and comfort and convenience.

In accordance with the City of Santa Monica's adopted LOS analysis methodology, the "Operational Analysis" method from the Highway Capacity Manual (HCM) was employed to perform signalized intersection LOS analysis at the study intersections. This method determines the average stopped delay experienced per vehicle and the volume-to-capacity (V/C) ratio at intersections. Both metrics are based on the amount of traffic traveling through the intersection, the turning movements of that traffic, the lane geometries, and other factors affecting capacity such as pedestrian volumes at the street crosswalks. These characteristics are used to evaluate the operation of each signalized intersection, which is described generally in terms of LOS.

The 17 signalized intersections located in or sharing jurisdiction with the City of Los Angeles were also analyzed per the requirements in the Los Angeles Department of Transportation's (LADOT's) Transportation Impact Study Guidelines. LADOT requires that signalized intersections be analyzed using the Critical Movement Analysis (CMA) method. Under the CMA methodology, LOS for each intersection is determined by summing the highest V/C ratios for corresponding movements. The V/C ratio is then matched to the appropriate LOS.

LOS Definition

LOS categories range from excellent, nearly free-flow traffic at LOS A to overloaded, stop-and-go conditions at LOS F. **Table 4.17-1**, *Level of Service Definitions for Signalized Intersections – City of Santa Monica (HCM) Methodology*, provides LOS definitions for signalized intersections using the HCM 2010 methodology. **Table 4.17-2**, *Level of Service Definitions for Signalized Intersections – City of Los Angeles (CMA) Methodology*, provides LOS definitions for signalized intersections using the CMA methodology. **Table 4.17-3**, *Level of Service Definitions for Unsiganlized Stop-Controlled Intersections*, provides LOS definitions for unsignalized study intersections analyzed as part of this Project.

TABLE 4.17-1
LEVEL OF SERVICE DEFINITIONS FOR SIGNALIZED INTERSECTIONS - CITY OF SANTA MONICA (HCM) METHODOLOGY

Level of Service	Average Stopped Delay per Vehicle (seconds)	Definition
A	≤10	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	>10 and ≤20	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	>20 and ≤35	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	>35 and ≤55	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	>55 and ≤80	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	>80	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019. Based on the *Highway Capacity Manual,* Transportation Research Board, 2010.

TABLE 4.17-2
LEVEL OF SERVICE DEFINITIONS FOR SIGNALIZED INTERSECTIONS – CITY OF LOS ANGELES (CMA) METHODOLOGY

Level of Service	Volume/Capacity	Definition
A	0.000 - 0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	>0.600 - 0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat what restricted within groups of vehicles.
C	>0.700 - 0.800	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	>0.800 - 0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	>0.900 - 1.000	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	> 1.000	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019. From the Highway Capacity Manual, Transportation Research Board, 2010. Based on Transportation Research Circular No. 212, Interim Materials on Highway Capacity, Transportation Research Board, 1980.

TABLE 4.17-3
LEVEL OF SERVICE DEFINITIONS FOR UNSIGNALIZED STOP-CONTROLLED INTERSECTIONS

Level of Service	Average Control Delay (seconds/vehicle)
A	≤ 10.0
B	> 10.0 and ≤ 15.0
C	> 15.0 and ≤ 25.0
D	> 25.0 and ≤ 35.0
E	> 35.0 and ≤ 50.0
F	> 50.0

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019. Based on the *Highway Capacity Manual,* Transportation Research Board, 2010.

Existing Levels of Service – City of Santa Monica (HCM) Methodology

The results of the analysis of existing weekday morning and afternoon conditions at the study intersections using the HCM 2010 methodology are summarized in **Table 4.17-4**, *Existing (2016) Intersection Level of Service – City of Santa Monica (HCM) Methodology*. As shown, 73 of the 79 existing study intersections operate at acceptable LOS (LOS D or better) during the AM and PM analyzed peak hours. The six study intersections that currently operate at poor conditions (LOS E or F) during at least one of the analyzed peak hours are:

7. Lincoln Boulevard & Olympic Boulevard/I-10 Westbound Off-Ramp (LOS E during the AM and PM peak hour)
8. Lincoln Boulevard & I-10 Eastbound On-Ramp (LOS E during the PM peak hour)
33. 20th Street & Pico Boulevard (LOS E during the PM peak hour)
50. Cloverfield Boulevard & Olympic Boulevard (LOS E during the PM peak hour)
74. Centinela Avenue & I-10 Westbound On-Off Ramps (LOS E during AM peak hour)
80. Bundy Drive & Ocean Park Boulevard (LOS F in the AM and PM peak hour)

Existing Levels of Service – City of Los Angeles (CMA) Methodology

The results of the analysis of existing weekday morning and evening peak hour conditions at the study intersections using the CMA methodology are summarized in **Table 4.17-5**, *Existing (2016) Intersection level of Service – City of Los Angeles (CMA) Methodology*. As shown, 15 of the 17 signalized intersections located in or shared with the City of Los Angeles operate at acceptable LOS (LOS D or better) during all analyzed peak hours. The two study intersections that currently operate at poor conditions during at least one of the analyzed peak hours under the existing conditions scenario are:

74. Centinela Avenue & I-10 Westbound Ramps (LOS E during the PM peak hour)
80. Bundy Drive & Ocean Park Boulevard (LOS F during the PM peak hour)

TABLE 4.17-4
EXISTING (2016) INTERSECTION LEVEL OF SERVICE – CITY OF SANTA MONICA (HCM) METHODOLOGY

No.	Intersection	City	Class	Control Type	Peak Hour	V/C	Delay*	LOS
1	Ocean Avenue & California Avenue	SM	A	Signalized	AM	0.976	43	D
					PM	1.030	53	D
2	Lincoln Boulevard & Wilshire Boulevard	SM	A	Signalized	AM	0.397	20	B
					PM	0.471	21	C
3	Lincoln Boulevard & Arizona Avenue	SM	A	Signalized	AM	0.358	17	B
					PM	0.422	19	B
4	Lincoln Boulevard & Santa Monica Boulevard	SM	A	Signalized	AM	0.488	23	C
					PM	0.541	29	C
5	Lincoln Boulevard & Broadway	SM	A	Signalized	AM	0.566	29	C
					PM	0.583	35	C
6	Lincoln Boulevard & Colorado Avenue	SM	A	Signalized	AM	0.655	22	C
					PM	0.702	23	C
7	Lincoln Boulevard & Olympic Blvd/I-10 WB Off-Ramp	SM	A	Signalized	AM	0.886	66	E
					PM	0.915	68	E
8	Lincoln Boulevard & I-10 EB On-Ramp	SM	A	Signalized	AM	0.779	31	C
					PM	0.916	69	E
9	Lincoln Boulevard & Ocean Park Boulevard	SM	A	Signalized	AM	0.801	49	D
					PM	0.766	54	D
10	11th Street & Santa Monica Boulevard	SM	A	Signalized	AM	0.434	18	B
					PM	0.485	18	B
11	11th Street & Pico Boulevard	SM	A	Signalized	AM	0.583	21	C
					PM	0.460	19	B
12	14th Street & Montana Avenue	SM	C	Signalized	AM	0.468	16	B
					PM	0.510	16	B
13	14th Street & Wilshire Boulevard	SM	A	Signalized	AM	0.435	16	B
					PM	0.483	16	B
14	14th Street & Arizona Avenue	SM	C	Signalized	AM	0.416	13	B
					PM	0.559	19	B
15	14th Street & Santa Monica Boulevard	SM	A	Signalized	AM	0.428	17	B
					PM	0.476	17	B
16	14th Street & Broadway	SM	C	Signalized	AM	0.466	16	B
					PM	0.503	16	B
17	14th Street & Olympic Boulevard	SM	A	Signalized	AM	0.469	16	B
					PM	0.536	17	B
18	17th Street & Montana Avenue	SM	C	Signalized	AM	0.477	8	A
					PM	0.500	8	A
19	17th Street & Wilshire Boulevard	SM	A	Signalized	AM	0.507	17	B
					PM	0.483	15	B
20	17th Street & Arizona Avenue	SM	C	Signalized	AM	0.407	14	B
					PM	0.636	21	C
21	17th Street & Santa Monica Boulevard	SM	A	Signalized	AM	0.471	17	B
					PM	0.513	17	B

No.	Intersection	City	Class	Control Type	Peak Hour	V/C	Delay*	LOS
22	17th Street & Broadway	SM	C	Signalized	AM	0.539	17	B
					PM	0.483	17	B
23	20th Street & Montana Avenue (west)	SM	C	Signalized	AM	0.340	6	A
					PM	0.380	6	A
24	20th Street & Montana Avenue (east)	SM	C	Signalized	AM	0.398	7	A
					PM	0.405	7	A
25	20th Street & Wilshire Boulevard	SM	A	Signalized	AM	0.604	20	B
					PM	0.509	18	B
26	20th Street & Arizona Avenue	SM	C	Signalized	AM	0.677	20	B
					PM	0.567	27	C
27	20th Street & Santa Monica Boulevard	SM	A	Signalized	AM	0.603	33	C
					PM	0.555	30	C
28	20th Street & Broadway	SM	C	Signalized	AM	0.472	16	B
					PM	0.488	17	B
29	20th Street & Colorado Avenue	SM	A	Signalized	AM	0.520	18	B
					PM	0.387	16	B
30	20th Street & Olympic Boulevard	SM	A	Signalized	AM	0.635	32	C
					PM	0.504	33	C
31	20th Street & I-10 EB Off-Ramp	SM	A	Signalized	AM	0.478	36	D
					PM	0.511	31	C
32	20th Street & Delaware Avenue	SM	C	Signalized	AM	0.283	10	A
					PM	0.465	11	B
33	20th Street & Pico Boulevard	SM	A	Signalized	AM	0.618	30	C
					PM	0.657	72	E
34	20th Place & Santa Monica Boulevard	SM		Future Intersection				
35	20th Place & Broadway	SM		Future Intersection				
36	21st Street & Arizona Avenue	SM	C	All-way stop	AM	0.384	10	A
					PM	0.759	17	C
37	21st Street & Broadway	SM	C	Two-way stop	AM	0.217	29	D
					PM	0.720	20	C
38	22nd Street & Arizona Avenue	SM	C	All-way stop	AM	0.415	10	A
					PM	0.629	13	B
39	22nd Street & Santa Monica Boulevard	SM		Future Intersection				
40	22nd Street & Broadway	SM		Future Intersection				
41	23rd Street & Wilshire Boulevard	SM	A	Signalized	AM	0.512	12	B
					PM	0.494	12	B
42	23rd Street & Arizona Avenue	SM	C	All-way stop	AM	0.514	14	
					PM	0.826	22	B C
43	23rd Street & Santa Monica Boulevard	SM	A	Signalized	AM	0.570	14	
					PM	0.527	9	B A
44	23rd Street & Broadway	SM	C	Two-way stop	AM	0.165	27	D
					PM	0.129	28	D
45	23rd Street & Pico Boulevard	SM	A	Signalized	AM	0.500	21	C
					PM	0.598	21	C
46	23rd Street & Ocean Park Boulevard	SM	A	Signalized	AM	0.809	44	D
					PM	0.676	24	C

No.	Intersection	City	Class	Control Type	Peak Hour	V/C	Delay*	LOS
47	Cloverfield Boulevard & Santa Monica Boulevard	SM	A	Signalized	AM	0.586	24	C
					PM	0.593	24	C
48	Cloverfield Boulevard & Broadway	SM	A	Signalized	AM	0.448	17	B
					PM	0.498	17	B
49	Cloverfield Boulevard & Colorado Avenue	SM	A	Signalized	AM	0.570	30	C
					PM	0.662	32	C
50	Cloverfield Boulevard & Olympic Boulevard	SM	A	Signalized	AM	0.591	42	D
					PM	0.817	55	E
51	Cloverfield Boulevard & Michigan Avenue	SM	A	Signalized	AM	0.547	23	C
					PM	0.717	21	C
52	Cloverfield Boulevard & I-10 WB Off-Ramp	SM	A	Signalized	AM	0.528	40	D
					PM	0.825	25	C
53	Cloverfield Boulevard & I-10 EB On-Ramp	SM	A	Signalized	AM	0.621	24	C
					PM	0.932	29	C
54	Cloverfield Boulevard & Virginia Avenue	SM	A	Signalized	AM	0.485	17	B
					PM	0.535	11	B
55	Cloverfield Boulevard & Pico Boulevard	SM	A	Signalized	AM	0.651	42	D
					PM	0.698	32	C
56	Cloverfield Boulevard & Ocean Park Boulevard	SM	A	Signalized	AM	0.534	11	B
					PM	0.559	14	B
57	24th Street & Montana Avenue	SM	C	Signalized	AM	0.344	10	B
					PM	0.336	5	A
58	26th Street & San Vicente Boulevard	SM, LA	A	Signalized	AM	0.591	44	D
					PM	0.628	41	D
59	26th Street & Montana Avenue	SM	C	Signalized	AM	0.547	16	B
					PM	0.619	18	B
60	26th Street & Wilshire Boulevard	SM	A	Signalized	AM	0.634	35	C
					PM	0.649	36	D
61	26th Street & Arizona Avenue	SM	A	Signalized	AM	0.519	21	C
					PM	0.529	21	C
62	26th Street & Santa Monica Boulevard	SM	A	Signalized	AM	0.593	31	C
					PM	0.618	33	C
63	26th Street & Broadway	SM	A	Signalized	AM	0.580	17	B
					PM	0.585	18	B
64	26th Street & Colorado Avenue	SM	A	Signalized	AM	0.423	24	C
					PM	0.609	29	C
65	26th Street & Olympic Boulevard	SM	A	Signalized	AM	0.504	29	C
					PM	0.498	31	C
66	Yale Street & Wilshire Boulevard	SM	A	Signalized	AM	0.497	10	A
					PM	0.470	11	B
67	Yale Street & Santa Monica Boulevard	SM	A	Signalized	AM	0.583	14	B
					PM	0.508	12	B
68	Berkeley Street & Wilshire Boulevard	SM, LA	A	Signalized	AM	0.617	16	B
					PM	0.530	14	B
69	Centinela Avenue & Wilshire Boulevard	SM, LA	A	Signalized	AM	0.534	8	A
					PM	0.556	11	B

No.	Intersection	City	Class	Control Type	Peak Hour	V/C	Delay*	LOS
70	Centinela Avenue & Santa Monica Boulevard	SM, LA	A	Signalized	AM	0.716	18	B
					PM	0.595	16	B
71	Centinela Avenue & Broadway	SM, LA	A	Signalized	AM	0.526	14	B
					PM	0.759	22	C
72	Centinela Avenue & Olympic Boulevard (west int)	SM, LA	A	Signalized	AM	0.664	15	B
					PM	0.640	16	B
73	Centinela Avenue & Olympic Boulevard (east int)	SM, LA	A	Signalized	AM	0.550	22	C
					PM	0.521	20	B
74	Centinela Avenue & I-10 WB On-Off Ramps	LA	A	Signalized	AM	0.734	69	E
					PM	0.811	50	D
75	Bundy Drive & Texas Avenue	LA	A	Signalized	AM	0.531	13	B
					PM	0.713	20	C
76	Bundy Drive & Wilshire Boulevard	LA	A	Signalized	AM	0.658	29	C
					PM	0.723	35	C
77	Bundy Drive & Santa Monica Boulevard	LA	A	Signalized	AM	0.520	21	C
					PM	0.571	21	C
78	Bundy Drive & Ohio Avenue	LA	A	Signalized	AM	0.498	16	B
					PM	0.537	18	B
79	Bundy Drive & Olympic Boulevard	LA	A	Signalized	AM	0.745	53	D
					PM	0.784	48	D
80	Bundy Drive & Ocean Park Boulevard	LA	A	Signalized	AM	0.823	81	F
					PM	0.667	**	F
81	Bundy Drive & I-10 EB On-Ramp	LA	A	Signalized	AM	0.733	16	B
					PM	0.710	33	C
82	Barrington Avenue & Wilshire Boulevard	LA	A	Signalized	AM	0.661	33	C
					PM	0.545	21	C
83	Barrington Avenue & Santa Monica Boulevard	LA	A	Signalized	AM	0.658	28	C
					PM	0.501	21	C

* Average stopped delay per vehicle, in seconds.

** Indicates oversaturated conditions. Delay cannot be calculated.

ACRONYMS: TWSC = Two-Way Stop Control, AWSC = All Way Stop Control, A = Arterial intersection, C = Collector intersection

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019. From the Highway Capacity Manual, Transportation Research Board, 2010.

TABLE 4.17-5
EXISTING (2016) INTERSECTION LEVEL OF SERVICE – CITY OF LOS ANGELES (CMA) METHODOLOGY

				Existing	
No.	**Intersection**	**City**	**Peak Hour**	**V/C**	**LOS**
58	26th St & San Vicente Blvd	SM/LA	AM	0.608	B
			PM	0.704	C
68	Berkeley St & Wilshire Blvd	SM/LA	AM	0.597	A
			PM	0.554	A
69	Centinela Ave & Wilshire Blvd	SM/LA	AM	0.513	A
			PM	0.488	A
70	Centinela Ave & Santa Monica Blvd	SM/LA	AM	0.721	C
			PM	0.587	A
71	Centinela Ave & Broadway	SM/LA	AM	0.434	A
			PM	0.809	D
72	Centinela Ave & Olympic Blvd (west)	SM/LA	AM	0.673	B
			PM	0.637	B
73	Centinela Ave & Olympic Blvd (east)	SM/LA	AM	0.534	A
			PM	0.504	A
74	Centinela Ave & I-10 WB Ramps	LA	AM	0.777	C
			PM	0.907	E
75	Bundy Dr & Texas Ave	LA	AM	0.433	A
			PM	0.559	A
76	Bundy Dr & Wilshire Blvd	LA	AM	0.771	C
			PM	0.769	C
77	Bundy Dr & Santa Monica Blvd	LA	AM	0.587	A
			PM	0.561	A
78	Bundy Dr & Ohio Ave	LA	AM	0.509	A
			PM	0.624	B
79	Bundy Dr & Olympic Blvd	LA	AM	0.802	D
			PM	0.806	D
80	Bundy Dr & Ocean Park Blvd	LA	AM	0.835	D
			PM	1.083	F
81	Bundy Dr & I-10 EB On-Ramp	LA	AM	0.595	A
			PM	0.565	A
82	Barrington Ave & Wilshire Blvd	LA	AM	0.645	B
			PM	0.546	A
83	Barrington Ave & Santa Monica Blvd	LA	AM	0.680	B
			PM	0.483	A

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019.

4.17.2.4 Existing Street Segment Traffic

This EIR also analyzes the Project' potential impacts on the operations of the 17 study street segments identified in Figure 4.17-3 above.

Table 4.17-6, *Existing (2016) Street Segment Operations* provides the existing average daily traffic (ADT) volumes of the 17 study street segments.

TABLE 4.17-6
EXISTING (2016) STREET SEGMENT OPERATIONS

No.	Segment	Analyzed Classification	Existing ADT
Arizona Avenue			
1	west of 17th Street	Feeder	7,002
2	west of 20th Street	Feeder	6,954
3	east of 23rd Street	Feeder	5,997
4	east of 26th Street	Feeder	4,973
15	between 20th and 23rd Street	Feeder	6,137
21st Street			
5	north of Wilshire Boulevard	Local	1,579
6	north of Arizona Avenue	Local	1,596
16	north of Broadway	Local	1,191
22nd Street			
7	north of Wilshire Boulevard	Local	2,431
8	north of Arizona Avenue	Local	1,256
	23rd Street		
9	north of Wilshire Boulevard	Local	5,240
10	north of Arizona Avenue	Local	5,839
11	north of Santa Monica Boulevard	Local	6,833
12	south of Pico Boulevard	Collector	8,470
14	south of Ocean Park Boulevard	Collector	15,260
Cloverfield Boulevard			
13	south of Pico Boulevard	Collector	8,486
17	Schader Drive segment west of Cloverfield Boulevard	Local	714

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019.

4.17.3. Regulatory Framework

4.17.3.1 Federal Regulations

Americans with Disabilities Act of 1990

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code (USC), beginning at Section 12101. Title III prohibits discrimination on the basis of disability in places of public accommodation (i.e., businesses and non-profit agencies that serve the public) and commercial facilities (i.e., other businesses). This regulation includes Appendix A to Part 36, Standards for Accessible Design, which establishes minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warning for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travelway, and a vibration-free zone for pedestrians.

4.17.3.2 State Plans and Regulations

Parking Cash Out

Parking Cash Out, Assembly Bill (AB) 2109, requires employers of 50 or more employees who lease their parking and subsidize any part of their employee parking to offer their employees the opportunity to give up their parking space and rideshare to work instead. In return for giving up their parking space, the employer pays the employee the cost of the parking space. The City of Santa Monica is the first city in the nation to implement a mandatory Parking Cash-Out Program.

Global Warming Solutions Act of 2006

With the passage of the Global Warming Solutions Act (AB 32), the State of California committed itself to reducing statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating the response to comply with AB 32 (refer to Section 4.8, *Greenhouse Gas Emissions*). The City of Santa Monica LUCE proactively incorporates strategies for integrated land use and transportation planning that achieve a per capita GHG reduction, VMT reduction, and trip reduction that would further the City's efforts to meet the statewide policy intent of this legislation.

Senate Bill 375

The adoption of Senate Bill (SB) 375 (Steinberg, Chapter 728, Statutes of 2008) on September 30, 2008 aligns the goals of regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations. SB 375 requires metropolitan planning organizations (MPOs) to adopt a sustainable communities strategy (SCS) or alternative planning strategy (APS) within their regional transportation plan to demonstrate the achievement of greenhouse gas reduction targets. In compliance with SB375, the Southern California Association of Governments (SCAG) has adopted a SCS, which covers all of the City of Santa Monica as well as other cities and counties.

Senate Bill (SB) 743

On September 27, 2013, Governor Brown signed SB 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under the California Environmental Quality Act (CEQA) process for several categories of development projects including the

development of infill projects in transit priority areas and to balance the needs of congestion management with Statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions. SB 743 adds Chapter 2.7: *Modernization of Transportation Analysis for Transit Oriented Infill Project* to the CEQA Statute (Section 21099). Section 21099(d)(1) provides that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.

In addition, SB 743 mandates that the Office of Planning and Research (OPR) develop alternative metric(s) for determining impacts relative to transportation to replace the use of LOS in CEQA documents. In the past, environmental review of transportation impacts under CEQA focused on the delay that vehicles experience at intersections and on roadway segments, which is often measured using LOS. Mitigation for impacts on vehicular delay often involves increasing capacity such as widening a roadway or the size of an intersection, which in turns encourages more vehicular travel and greater pollutant emissions. Additionally, improvements to increase vehicular capacity can often discourage alternative forms of transportation such as biking and walking. Under SB743, the alternative metric shall promote the State's goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of multimodal transportation system, and providing clean, efficient access to destinations.

Pursuant to the mandate in SB7 43, OPR adopted the revised CEQA Guidelines in December 2018, recommending the use of VMT for analyzing transportation impacts under CEQA. Specifically, Section 15064.3 was added to CEQA Guidelines, which states "generally, vehicle miles traveled is the most appropriate measure of transportation impacts". Additionally, OPR adopted *Updates to Technical Advisory on Evaluating Transportation Impacts in CEQA*, to provide guidance on VMT analysis. In this Technical Advisory, OPR provides its recommendations to assist lead agencies in screening out projects from VMT analysis and selecting a significance threshold that may be appropriate for their particular projects. While OPR's Technical Advisory is not binding on public agencies, CEQA allows lead agencies to "consider thresholds of significance . . . recommended by other public agencies, provided the decision to adopt those thresholds is supported by substantial evidence." (CEQA Guidelines, § 15064.7, subd. (c).)

The updated CEQA Guidelines apply prospectively, meaning that projects such as the proposed Project are not currently required to incorporate VMT as the primary transportation impact metric. Under SB 743, lead agencies have until July 1, 2020 to develop and adopt new analytical procedures and threshold criteria to implement VMT as the primary transportation impact metric, at which time auto delay will no longer be considered a significant impact under CEQA. Furthermore, the NOP for the proposed Project was issued in April 10, 2017, and the updated CEQA Guidelines was updated in December 2018. The City of Santa Monica has not yet adopted local VMT significance thresholds and as such, this EIR provides an analysis of LOS for the proposed Project. However, for informational purposes, a VMT analysis for the proposed Project is provided in this section.

4.17.3.3 Regional Plans and Regulations

Southern California Association of Governments 2016–2040 Regional Transportation/Sustainable Communities Strategy (2016 RTP/SCS)

SCAG is the designated MPO for six Southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial), and is federally mandated to develop plans for regional transportation, land use and growth management, hazardous waste management, and air quality. Santa Monica is one of many jurisdictions comprising the SCAG.

On April 7, 2016, SCAG's Regional Council adopted the 2016 - 2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The 2016 RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's transportation and related challenges. The 2016 RTP/SCS includes nine goals that pertain to economic development, mobility, accessibility, travel safety, productivity of the transportation system, protection of the environment and health through improved air quality, energy efficiency, and land use and growth patterns that complement the state and region's transportation investments, and security of the regional transportation system.

The RTP/SCS provides goals and policies to minimize increases in regional traffic congestion by focusing growth, density, and land use intensity within existing urbanized area. The RTP/SCS encourages local jurisdictions to accommodate future growth near high quality transit areas (HQTA) to reduce VMT, congestion, and greenhouse gas (GHG) emissions. Exhibit 5.1 of the 2016 RTP/SCS identifies the Project Site as being located a High Quality Transit Area (HQTA).

Los Angeles County Congestion Management Plan

The CMP is a 1990 era state-mandated performance-based planning program that attempts to link land use and transportation decisions. The statute designated regional Congestion Management Agencies and charged them with administering the program. As the congestion management agency for Los Angeles County, the Metropolitan Transportation Authority (Metro) is responsible for implementation of the Congestion Management Program (CMP). The Metro Board adopted the 2010 CMP for Los Angeles County, which addresses the impact of local growth on the regional transportation system, and designates certain freeway segments and arterial roadways as CMP facilities. Under the CMP, the 88 incorporated cities plus the County of Los Angeles share various statutory responsibilities, including monitoring traffic count locations on select arterials, implementing transportation improvements, adoption of travel demand management and land use ordinances, and mitigating congestion impacts.

The LOS at each CMP monitoring station is supervised by local jurisdictions in order to implement the statutory requirements of the CMP. If LOS standards deteriorate, then local jurisdictions must prepare a deficiency plan to meet conformance standards outlined by the countywide plan. After nearly 30 years, Metro has acknowledged that CMP approach is outdated and is no longer considered an effective tool to achieve the intended outcomes. Furthermore, the CMP's use of LOS conflicts with SB743, which require use of VMT related performance measures. SB 743 and other state laws that have been enacted over the last decade are intended to, among other things, address climate change, support infill development and sustainable transportation. Metro, like other lead

agencies, is developing new ways to measure transportation system performance. transportation decisions must be linked to a broader strategy of accessibility and livability. Therefore, Metro has begun a process allowing for jurisdictions to opt out of the program and stop doing the annual compliance reporting. Subsequently, the City adopted in February 2019 a resolution to opt out of the CMP. No definite timeline from Metro has been established for completing this process, and therefore the impact thresholds and analysis presented below follows the procedures that are currently in effect.

4.17.3.4 Local Plans and Regulations

Santa Monica Municipal Code Article 9

Chapter 9.28, Section 140, Bicycle Parking

The Santa Monica Municipal Code (SMMC) requires all new development to provide a minimum number of bicycle parking spaces based on the primary uses of the site. Bicycle spaces must be provided for both short-term and long-term parking needs. This section of the SMMC also requires bicycle parking to be provided in a safe, secured, well-lit, and accessible location with adequate signage.

Chapter 9.53, Transportation Demand Management

The purpose of the City's Transportation Demand Management (TDM) Ordinance is to proactively manage traffic congestion, reduce automobile dependence, and enhance transportation choices by requiring trip reduction plans. The ordinance applies to employers with 10 employees or more; and developers of projects with 7,500 square feet of floor area, 16 units, or mixed use project with 16 units or more. Developers are required to prepare TDM programs for addressing traffic reductions including such items as information and incentives, and enhancements that support walking, biking, and transit. Under the TDM Ordinance, employers are required to achieve the City's target average vehicle ridership (AVR). The rates for non-industrial districts ranges from 1.75 to 2.2, depending upon location.

Under the City's TDM Ordinance, employers with 10 to 49 employees are required to provide each of their employees with information about carpooling/vanpooling, transit, air pollution, bicycle routes and facility, walking and pedestrian safety, and alternatives to driving alone to work every day. Employers of 50 or more employees are required to prepare an Emission Reduction Plan, which shall include the option of 1) purchase of mobile source emission reduction credits or 2) preparation and implementation of Employee Trip Reduction Plan to achieve the applicable AVR target. Additionally, developers of Projects are required to prepare and implement a TDM plan that would include physical and programmatic elements to reduce single occupancy vehicle trips and achieve the targeted AVR. For the Health Care Mixed Use District where the Project Site is located, the targeted AVR is 2.0. Annual monitoring is a requirement of the developer TDM Plan.

Chapter 9.73, Transportation Impact Fee

Chapter 9.73 of the SMMC is intended to ensure that new development projects through the year 2030 to pay its fair share of the costs of providing transportation infrastructure necessary to implement the policies and achieve the No Net New PM Peak Hour trips goals of the LUCE. The new development will fund transportation improvements such as new sidewalks, crosswalks, traffic

signal upgrades, transit, and bicycle facilities that are necessitated by the new trips associated with land use change. The fees are based on residential units or commercial square footage. The fee is charged prior to issuance of building permits, unless state law requires the City to accept later fee payments.

Chapter 9.28, Parking, Loading, and Circulation

The Santa Monica Municipal Code (SMMC) also includes relevant guidance on the location and characteristics of parking driveways. "Required off-street parking and loading spaces shall be located on the same parcel as the use they serve, except as otherwise provided in this Chapter. Entrances to off-street parking and loading should be located on a non-primary façade, except as described below. Where a parcel contains more than 1 street frontage, the parking entrance should be located on the secondary street or alley. All efforts should be made to eliminate the impacts of parking entrances on main thoroughfares and transit-oriented streets. …" (SMMC Section 9.28.070).

For new development projects providing at least 25 parking spaces, electric vehicle charging stations must be provided in the following amounts: for 25-49 parking spaces: 1 charging station and for 50-99 parking spaces: 2 charging stations, plus one for each additional 50 parking spaces. (SMMC Section 9.28.160)

"Loading spaces shall be accessible from an alley, or if no alley is adjacent to the site, a minor roadway." (SMMC Section 9.28.080 F. 5)

"The design, location or position of any parking layout, entry, driveway, approach or access way from any street or alley shall be approved by the Director." (SMMC Section 9.28.120 A)

"Alley Access. Access to parking areas shall be from alleys. Curb cuts are prohibited except where a project site meets at least one of the following criteria:

- The site has no adjacent side or rear alley having a minimum right-of-way of 15 feet. Corner parcels with no adjacent side or rear alley must take access from the side street.
- The average slope of a multi-unit residential parcel is at least 5 percent.
- The Director determines that a curb cut is appropriate due to traffic, circulation, or safety concerns.
- Commercial properties may have nonresidential parking access from side streets." (SMMC Section 9.28.120 B.3)

"Hazardous Visual Obstructions … no person shall permit any obstruction, including, but not limited to, any fence, wall, hedge, tree, or landscape planting to obscure or block the visibility of vehicles entering or exiting an alley, driveway, parking lot, street intersection, or other vehicle right-of-way or to constitute an unreasonable and unnecessary hazard to persons lawfully using an adjacent pedestrian or vehicle right-of-way. In addition, no obstruction shall be located less than 5 feet from the intersection of the street-facing parcel line with a driveway or garage door, or the intersection of parcel lines adjacent to street or alley intersections unless the obstruction is either less than 24 inches above the adjacent vehicle right-of-way or is authorized pursuant to subsection

(B). In addition, unless authorized pursuant to subsection (B), no obstruction shall be located less than 5 feet from the intersection of the alley-facing parcel line with a driveway or garage door, and this area.

Santa Monica General Plan Land Use and Circulation Element

The LUCE of the City's General Plan integrates the City's land use and transportation planning functions; and governs existing and future land uses in the City. The LUCE has a number of Goals and Policies that are related to the potential impacts of the Project on transportation.

LUCE Section 2¸ Land Use Policy and Designations

Goal LU2: Integrate Land Use and Transportation for GHG Emission Reduction - Integrate land use and transportation, carefully focusing new development on transit-rich boulevards and in the districts, to create sustainable active pedestrian-friendly centers that decrease reliance on the automobile, increase walking, bicycling and transit use, and improve community quality of life.

Policy LU2.2: Capitalize on the Expo Light Rail stations to create vital new complete sustainable neighborhoods with transit as a focal element, green connections and pathways, a variety of housing types and jobs, enhanced creative arts and institutions, and local-serving retail and services.

Policy LU2.6: Focus new development in defined districts to create active spaces that can support diverse local-serving retail and services, walkability, arts and culture. Require, whenever possible, new development to provide convenient and direct pedestrian and bicycle connections.

Policy LU2.5: Vehicle Trip Reduction. Achieve vehicle trip reduction through comprehensive strategies that designate land uses, establish development and street design standards, implement sidewalk, bicycle, and roadway improvements, expand transit service, manage parking, and strengthen TDM programs that support accessibility by transit, bicycle, and foot, and discourage vehicle trips at a district-wide level. Monitor progress using tools that integrate land use and transportation factors. Increase bicycle and pedestrian connectivity in transit districts and adjust bus and shuttle services to ensure success of the transit system.

Goal LU5: Cluster housing, employment, local-serving retail and services around the Expo Light Rail Line to reduce vehicle trips, create complete neighborhoods, and support transit.

Policy LU5.2: Integrate supporting transit linkages, as well as pedestrian and bicycle connections, at all stations. Parking developed at or near a station is shared with other uses and priced to ensure availability at all times.

Goal LU8: Reduction of Vehicle Trips/Management of Congestion

Policy LU8.1: Transportation Demand Management. Require participation in TDM programs for projects above the base to encourage walking, biking, and transit, and to reduce vehicle trips. Engage existing development in TDM Districts and programs to encourage reduction of existing vehicle trips.

Policy LU8.2: Comprehensive Parking Management. Comprehensively manage parking and parking policies to address housing affordability, congestion management, and air quality goals. Facilitate the creation of shared parking, particularly within activity centers, transit districts, and near Expo light-rail stations. Use pricing and other innovative strategies to man

Policy LU8.3: Ensure pedestrian, bicycle, and transit mobility by creating facilities for comfortable walking throughout the City, a complete and safe bicycle network, and convenient and frequent transit service that will make transit an attractive option for all types of trips. age parking availability.

LUCE Section 4.0, Circulation

Goal T3: Ensure that Santa Monica's streets are pleasant for all users

Policy T3.1: Include elements that contribute to quality from the user's perspective, not just throughput for each mode.

Goal T6: Enable Everyone to Walk Comfortably Everywhere in Santa Monica

Policy T6.4: Use a combination of physical improvements and programs to promote walking.

Goal T8: Provide a beautiful and attractive pedestrian environment throughout the City of Santa Monica

Policy T8.4: Design buildings to prioritize pedestrian access from the street, rather than from a parking lot.

Goal T15: Manage local and regional congestion affecting Santa Monica.

Policy T15.1: Reduce automobile trips starting or ending in Santa Monica, especially during congested periods, with the goal of keeping peak period trips at or below 2009 levels.

Goal T18: Encourage a more sustainable transportation system. An action to further this goal that relates to private development is to prohibit driveways on boulevards and major avenues where access is available from a side street or alley. Implement standards for the safe and convenient design of projects, including safe interaction between private property and the public right-of-way.

Goal T25: Design parking to meet applicable urban design goals and minimize negative impacts on pedestrians, bicyclists and transit users

Policy T25.1: Require adequate on-site loading areas for child care centers, healthcare offices and other uses with intensive passenger drop-off demands, and work with schools to encourage provision of adequate loading areas.

Policy T25.2: Require that parking be accessed only from alleys, where alley access is available.

Policy T25.3: Minimize the width and number of driveways at individual development projects.

Santa Monica Bike Action Plan

The Bike Action Plan, adopted in November 2011, guides the City's efforts to promote an increase in safe bicycling consistent with the LUCE. The Bike Action Plan includes a 5-year Implementation Plan to improve 75 percent of the City's bicycle network as well as a long term 20-year Vision Plan. The implementation priorities include both bikeway and program investments. Recommended programs include efforts in all program areas: events, awareness, information, education, encouragement, enforcement and supporting facilities such as development of a bicycle wayfinding system and bicycle parking improvements. Recommended bikeway investments include both facility improvements that are relatively easy and low cost, so they can be applied on many streets,

as well as facility improvements that require more outreach, design and environmental review, but are critical to the development of a high-quality continuous bikeway "backbone" and showcase leading bicycle treatments. The Bike Action Plan's 5-Year Implementation Plan identifies numerous improvements throughout the City.

Santa Monica Pedestrian Action Plan

The City of Santa Monica also adopted a Pedestrian Action Plan in 2016. The plan provides a comprehensive approach to pedestrian policy in Santa Monica using a multi-disciplined approach to making physical, operational and educational improvements that prioritize pedestrians. The goals, policies and actions in the Pedestrian Action plan address the input gathered from the community, stake holders and key professionals such as public safety personnel, transportation planners and engineers, while aligning a vision with data analysis to develop strategies that prioritize actions for the short- and long-terms. The Plan introduces a Vision Zero program which envisions zero fatalities from pedestrian crashes. Components of the program include prioritizing and organizing community safety goals, and facilitating the systematic implementation of current and future actions that support safer walkability for people of all ages and abilities. The Plan also includes a tool box that provides guidance to best address existing and future street conditions to help all City departments recognize and respond to pedestrian priorities.

4.17.4 Environmental Impacts

4.17.4.1 Thresholds of Significance

Appendix G of the State CEQA Guidelines provides a set of questions that address transportation impacts. These questions are listed below:

Would the project:

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

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)?

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

d) Result in inadequate emergency access?

With regard to the questions above, the Project would result in significant transportation impacts if it would result in exceedance of the significance thresholds set forth below:

Consistency with Circulation Programs, Plans, Ordinances, or Policies

The significance criteria used to evaluate Project impacts to circulation programs, plans, ordinances, or policies are qualitative and directly based on Appendix G of the CEQA Guidelines. The CEQA guidelines provides that lead agencies may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects, and the use of Appendix G as a significance threshold is routinely sanctioned by the courts (although such use is not mandatory). *See Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal. App.4th 1059,1068; Mount*

Shasta Bioregional Ecology Center v. County of Siskiyou (2012) 210 Cal.App.4th 184, 205; Oakland Heritage Alliance v. City of Oakland (2011) 195 Cal.App.4th 884, 896.

Therefore, the Project would have a significant impact related to circulation programs, plans, ordinances, or policies if it would:

- Conflict with a program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities
- Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)

Vehicle Miles Travelled

Section 15064.3 of the revised CEQA Guidelines was adopted by the Office of Planning and Research on December 28, 2018, and states that VMT is the appropriate measure of transportation impacts. Section 15064.3(c) also states that the provisions of this section shall apply prospectively (i.e., only applicable to new projects after date of adoption) and must be implemented statewide by January 1, 2020. As previously stated, the NOP for the proposed Project was issued in April 2017, prior to the adoption of Section 15064.3 of the CEQA Guidelines. Therefore, this EIR continues to provide an analysis of the Project's transportation impacts using the City's existing adopted LOS significance thresholds and street segment trip thresholds (see below). For informational purposes, a quantified VMT analysis consistent with Section 15064.3 requirements is provided in this section from the TIA. No determination of significance is provided however, since the City of Santa Monica has not yet adopted significance thresholds for VMT or a methodology for determining impacts based on VMT.

Intersection Operations

As discussed previously, a key provision of SB 743, passed in September 2013, is the elimination of vehicle delay (as measured using LOS) as a CEQA significance criterion in urban areas. The basic reason for this change at the State level is the recognition that there can be conflicts between improvements that benefit automobiles versus those that benefit other modes of transportation in urban areas (e.g., widening streets to improve automobile LOS can often be to the detriment of pedestrians), that continued reliance on automobiles is at odds with State objectives to reduce greenhouse gas emissions (through reductions in vehicle miles of travel), and that mitigation for increased vehicle delay often involves measures which may increase auto use and discourage alternative forms of transportation. When employed in isolation, LOS can lead to ad hoc roadway expansions that deteriorate conditions on the network as a whole, or discourage transportation improvements that improve street function overall, by providing better service for transit pedestrians or bicycles, but decreasing level of service for vehicles. Among the issues with vehicle LOS identified by the Governor's Office of Planning and Research (OPR) are the following:

- LOS is biased against "last in" development;
- LOS scale of analysis is too small;
- LOS mitigation is problematic (e.g., physical constraints limit roadway capacity upgrades);
- LOS mischaracterizes transit, bicycle and pedestrian improvements as detrimental to transportation (i.e., improvements for pedestrians may result in degraded vehicle LOS);

- Use of LOS thresholds implies false precision; and,
- As a measurement of delay, LOS measures motorist convenience, but not a physical impact to the environment.

According to the legislative intent contained in SB 743, changes to the current practice of using LOS for CEQA analysis are necessary to, "More appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions." Pursuant to SB743, Section 15064.3 of the revised CEQA Guidelines was adopted on December 28, 2018, which establishes VMT as the appropriate metric to replace automobile delay (as measured using LOS) for analyzing transportation impacts under CEQA. The City of Santa Monica has not yet adopted significance thresholds for VMT or a methodology for determining impacts based on VMT. As such, this EIR continues to provide an analysis of the Project's transportation impacts using the City's existing adopted LOS significance thresholds and street segment trips thresholds (see below).

City of Santa Monica

In 1991, the City of Santa Monica established criteria for assessing whether Project-related vehicle trips would result in significant impacts on intersection operating conditions using the measure of automobile delay. The thresholds of significance, summarized in **Table 4.17-7**, *Significance Impact Criteria for Arterial and Collector Intersections – City of Santa Monica*, depends on the 1985 LUCE classification of the streets at the intersection (e.g., arterial, collector, or local street) and the operating conditions of the intersection under cumulative plus Project conditions. Although street classifications were updated in the 2010 LUCE, the City's traffic significance criteria have not been updated to reflect the current LUCE nomenclature. Based on the City's adopted significance criteria, the potential significance of a project's impact is measured by either the change in average vehicle delay (measured in seconds) or by a change in the intersection operating conditions to unacceptable conditions. If the projected LOS is F, however, significance is defined in terms of a change in vehicle to capacity (V/C) ratio (as calculated by the HCM operational method), since the average vehicular delay cannot be calculated using the Highway Capacity Manual operational method if the intersection exhibits oversaturated traffic conditions.

Using the significance criteria in Table 4.17-7, a project would not be considered to have a significant impact at an intersection if, for example, it is on an arterial street operating at LOS D with the addition of Project vehicle trips and the incremental change in the average vehicle delay is less than 15 seconds. If the intersection is operating at LOS E after the addition of Project vehicle trips and the average vehicle delay increases by any amount, however, this would be considered a significant project impact. All impacts on intersections projected to operate at LOS F are based on the V/C ratio, with project-related increases of 0.005 or greater considered significant.

Table 4.17-8, *Significance Impact Criteria for Unsiganlized Stop-Controlled Intersections*, summarizes the significance criteria for unsignalized stop-controlled intersections.

TABLE 4.17-7
SIGNIFICANCE IMPACT CRITERIA FOR ARTERIAL AND COLLECTOR INTERSECTIONS – CITY OF SANTA MONICA

Base Scenario		Plus Project Scenario
IF LOS = A, B, OR C		**SIGNIFICANT IMPACT IF:**
==>	and is a collector street intersection	Average vehicle delay increase is ≥ 15 seconds or LOS becomes D, E, or F
==>	and is an arterial intersection	Average vehicle delay increase is ≥ 15 seconds or LOS becomes E or F
IF LOS = D		**SIGNIFICANT IMPACT IF:**
==>	and is a collector street intersection	Any net increase in average seconds of delay per vehicle
==>	and is an arterial intersection	Average vehicle delay increase is ≥ 15 seconds or LOS becomes E or F
IF LOS = E		**SIGNIFICANT IMPACT IF:**
==>	and is a collector or arterial intersection	Any net increase in average seconds of delay per vehicle
IF LOS = F		**SIGNIFICANT IMPACT IF:**
==>	and is a collector or arterial intersection	HCM V/C ratio net increase is ≥ 0.005

* Functional street classifications for Santa Monica Intersections in this table are from the City's previous Circulation Element. The 2010 Land Use and Circulation Element (LUCE) has adopted a different typology for streets within the City but the significance criteria have not yet been revised.
SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019. From the City of Santa Monica's previous Circulation Element.

TABLE 4.17-8
SIGNIFICANCE IMPACT CRITERIA FOR UNSIGNALIZED STOP-CONTROLLED INTERSECTIONS

Level of Service	Average Control Delay (seconds/vehicle)
A	≤ 10.0
B	> 10.0 and ≤ 15.0
C	> 15.0 and ≤ 25.0
D	> 25.0 and ≤ 35.0
E	> 35.0 and ≤ 50.0
F	> 50.0

SOURCE: *Highway Capacity Manual,* Transportation Research Board, 2010.

City of Los Angeles

The City of Los Angeles has established threshold criteria to determine significant intersection operations impacts of a proposed project in its jurisdiction. Under the LADOT guidelines, an intersection would be significantly impacted with an increase in V/C ratio equal to or greater than 0.04 for intersections operating at LOS C, equal to or greater than 0.02 for intersections operating at LOS D, and equal to or greater than 0.01 for intersections operating at LOS E or F after the

addition of Project vehicle trips. Intersections operating at LOS A or B after the addition of Project vehicle are not considered significantly impacted regardless of the increase in V/C ratio. The criteria are summarized in **Table 4.17-9**, *Significance Impact Criteria for Arterial and Collector Intersections – City of Los Angeles*.

TABLE 4.17-9
SIGNIFICANCE IMPACT CRITERIA FOR ARTERIAL AND COLLECTOR INTERSECTIONS – CITY OF LOS ANGELES

LOS	Final V/C Ratio	Project-Related Increase in V/C
C	> 0.700 – 0.800	≥ 0.040
D	> 0.800 – 0.900	≥ 0.020
E or F	> 0.900	≥ 0.010

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019.

Street Segment Operations

The City of Santa Monica significance impact criteria used to evaluate potential traffic impacts on street segments are based on the existing ADT volumes and the projected level of volume increase that can be attributed to the Project. The current significance criteria for collector, feeder, and local streets are provided in **Table 4.17-10**, *Significance Impact Criteria for Collector, Feeder and Local Streets*.[1]

TABLE 4.17-10
SIGNIFICANCE IMPACT CRITERIA FOR COLLECTOR, FEEDER AND LOCAL STREETS

Collector Streets	
A transportation impact is significant if the Base Average Daily Traffic Volume (ADT) is:	Greater than 13,500 and there is a net increase of one trip or more in ADT due to project related traffic
	Greater than 7,500 but less than 13,500 and the project related traffic increases* the ADT by 12.5% or the ADT becomes 13,500 or more
	Less than 7,500 and the project related traffic increases* the ADT by 25%
Feeder Streets	
A transportation impact is significant if the Base Average Daily Traffic Volume (ADT) is:	Greater than 6,750 and there is a net increase of one trip or more in ADT due to project related traffic
	Greater than 3,750 but less than 6,750 and the project related traffic increases* the ADT by 12.5% or the ADT becomes 6,750 or more
	Less than 3,750 and the project related traffic increases the ADT by 25%
Local Streets	
A transportation impact is significant if the Base Average Daily Traffic Volume (ADT) is:	Greater than 2,250 and there is a net increase of one trip or more in ADT due to project related traffic
	Greater than 1,250 but less than 2,250 and the project related traffic increases* the ADT by 12.5% or the ADT becomes 2,250 or more
	Less than 1,250 and the project related traffic increases* the ADT by 25%

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019.

[1] Nomenclature for street classifications

Regional Transportation System

Metro's CMP establishes that the traffic impact on regional facilities analysis begins with screening criteria. The CMP requires that a Traffic Impact Analysis (TIA) be prepared if the vehicle trips generated by the Project were to exceed the following CMP screening criteria:

- The Project were to add 50 or more trips during PM weekday peak hours of adjacent street vehicle trips at a CMP monitoring location.
- The Project were to add 150 or more trips, in either direction, during PM weekday peak hours at a CMP mainline freeway monitoring location.

If the project generates less than trips than the above criteria, then no further analysis is required. Per the CMP, a significant impact would occur if the TIA finds that the CMP facility is projected to operate at LOS F (V/C > 1.00) and if Project vehicle trips causes an incremental change in the V/C ratio of 0.02 or greater.

The CMP was one of the pioneering efforts to conduct performance-based regional transportation planning. Because it primarily uses LOS to assess congestion, however, it is inconsistent with the direction of SB 743 which requires use of VMT-related performance measures for determining CEQA impacts. SB 743 and other state laws that have been enacted over the last decade are intended to, among other things, address climate change, support infill development and sustainable transportation. Metro, like other lead agencies, is developing new ways to measure transportation system performance. These are among the reasons that Metro has initiated on June 28, 2018 a process that could lead to jurisdiction for opting out of the CMP, as permitted by the original legislation. Subsequently, the City adopted in February 2019 a resolution to opt out of the CMP. No definite timeline from Metro has been established for completing this process, and therefore the impact thresholds and analysis presented below follows the procedures that are currently in effect.

Regional Transit Operations

The CMP also states that the TIA should include an analysis of a project's impacts on transit services. No specific quantitative threshold for CMP transit impacts is provided. For the purposes of this EIR, a significant impact would occur if the Project generates transit trips that would exceed the capacity and capabilities of the transit route and service provider.

Hazards Due to Design Features

The significance criteria used to evaluate project impacts to hazards due to design features are qualitative and directly based on Appendix G of the CEQA Guidelines. The CEQA guidelines provides that lead agencies may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects, and the use of Appendix G as a significance threshold is routinely sanctioned by the courts (although such use is not mandatory). *See Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal. App.4th 1059,1068; Mount Shasta Bioregional Ecology Center v. County of Siskiyou (2012) 210 Cal.App.4th 184, 205; Oakland Heritage Alliance v. City of Oakland (2011) 195 Cal.App.4th 884, 896.* Therefore, the Project would have a significant impact related to hazardous design features if it would:

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

Emergency Access

The significance criteria used to evaluate Project impacts to emergency access are qualitative and directly based on Appendix G of the CEQA Guidelines. The CEQA guidelines provides that lead agencies may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects, and the use of Appendix G as a significance threshold is routinely sanctioned by the courts (although such use is not mandatory). *See Save Cuyama Valley v. County of Santa Barbara (2013) 213 Cal. App.4th 1059,1068; Mount Shasta Bioregional Ecology Center v. County of Siskiyou (2012) 210 Cal.App.4th 184, 205; Oakland Heritage Alliance v. City of Oakland (2011) 195 Cal.App.4th 884, 896.* Therefore, the Project would have a significant impact related to emergency access if it would:

- Result in inadequate emergency access

4.17.4.2 Methodology

Consistency with Circulation Plans/Programs/Ordinances/Policies

The analysis of consistency with circulation plans, programs, ordinances, and policies reviews the Project and determines whether the Project would obstruct or conflict with the applicable plans, programs, ordinance, and policies listed in the Regulatory Framework.

Conflict or Be Inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)

Vehicle Miles Travelled

As indicated previously, a quantified VMT analysis consistent with 2019 CEQA Guidelines Section 15064.3 requirements is provided in this section for informational purposes only. The analysis estimates the per capita VMT that would result from the Project and compares it to the existing Citywide per capita VMT.

OPR's *Technical Advisory On Evaluating Transportation Impacts in CEQA* recommends evaluating each component of a mixed-use project independently. The following steps were used for the VMT analysis:

- Estimate daily trip generation of the Project presented in Tables 4.17-11 and 4.17-12.
- Estimate the number of workers of the Project.
- Apply the average vehicle ridership (AVR) factor of 2.0 to the worker trips, which is the AVR target established for this site per SMMUSD 9.53.040.
- The City of Santa Monica's travel demand forecasting model (TDFM) includes data on the average daily trips, VMT, and trip length by trip purpose for each traffic analysis zone (TAZ), as well as the Citywide averages. The Project is located in TAZs 407 and 434 of the Santa Monica TDFM. The average home-based work trip attraction in TAZs 407 and 434 is 12.8 miles, which is higher than the Citywide base year (2013) average of 12.1 miles. Base

year model values were used for comparison, since the 2013 base is the most recent validated TDFM model run.

- Multiply the estimated worker trips by the trip length, and divide by the number of workers to calculate average VMT per worker. The trip length is from the TDFMF and It is important to note that the City has implemented an ambitious TDM program to reduce the Citywide average VMT per employee. In addition, the Expo Line provides light rail service from Santa Monica to downtown Los Angeles. The Expo Line began service west of Culver City in May 2016 and has significantly improved transit access in the City of Santa Monica.
- Estimate the number of non-worker trips to and from the Project Site.

The average trip length for home-based other trip attractions and non-home-based trip attractions in TAZs 407 and 434 is 8.4 miles. An analysis of home zip codes for current hospital patients yielded an average VMT of 8.3. The average trip length for non-home-based trip productions in TAZs 407 and 434 is 4.0 miles.

Intersection Operations

In consultation with the City of Santa Monica, 83 study intersections in the Project vicinity were selected for analysis, including four new intersections proposed under the Project. The analysis of intersection operations evaluates the potential for Project vehicle trip impacts on the 83 study intersections as a result of Project-generated vehicle trips. These intersections were selected based on their locations along routes anticipated to be used as access routes between the Project Site and the surrounding city and region. The Project's peak hour vehicle trip impacts during the typical weekday AM (7:30 to 9:30 AM) and PM (5:00 to 7:00 PM) peak periods were evaluated at each intersection. The existing conditions (2016) traffic scenario was analyzed, as were the Approval Year (2019), Interim Year (2031) and Future Year (2042) traffic analysis scenarios both without and with the Project. See the "Traffic Analysis Scenarios" subsection above for a description of each of these scenarios.

Per City of Santa Monica traffic study guidelines, all 83 study intersections were analyzed using the HCM operations methodology. In addition, the 17 intersections located wholly or partly in the City of Los Angeles were analyzed using the CMA methodology as required by LADOT. Seventy-eight of the 83 study intersections are currently controlled by traffic signals. The remaining five are stop-controlled intersections. The analysis examined the existing 79 intersections for all "without Project" scenarios and each of the 83 intersections (consisting of 79 existing intersections and four new ones) for "with Project traffic" scenarios. The intersections are identified in Figure 4.17-3 and listed in the TIA.

The analysis of impacts on intersections is based on a multistep methodology in which baseline and future "without" Project traffic conditions are determined; the number of trips from the proposed Project is calculated and added to the traffic flows; the post-Project traffic operating conditions are compared to the pre-Project operations; and the effects of the added Project vehicle trips are compared to the significance thresholds. The analysis addresses the proposed Project's impacts during the weekday AM peak period (7:30 to 9:30 AM) and weekday PM peak period (5:00 to 7:00 PM) for the baseline Approval Year (2019) and Future Year (2042) operating conditions.

To evaluate the potential impacts of the proposed Project on the surrounding street system, it was necessary to develop estimates of Approval Year (2019) and Future (2042) traffic forecasts in the area both without and with Project vehicle trips.

Approval Year and Future Year Traffic Projections

To evaluate the potential impacts of the Project on the surrounding street system, traffic conditions under existing (2016) conditions was identified, and it was necessary to develop estimates of Approval Year (2019), Interim Year (2031), and Future (2042) traffic forecasts in the area both without and with Project vehicle trips. The traffic forecasts are derived from the City of Santa Monica's Travel Demand Forecast Model (TDFM), which was developed as part of the LUCE update in 2010 and is specifically calibrated to local City conditions. This model produces cumulative traffic forecasts for Santa Monica and surrounding areas of the City of Los Angeles.

- Existing Conditions (2016) – The analysis of existing conditions provided a basis for the assessment of Approval Year (2019), Interim Year (2031), and Future Year (2042) traffic conditions. This assessment is based on the traffic counts collected by the City in 2016. The existing conditions analysis included a description of key area streets and highways, traffic volumes, and current intersection and street operating conditions.

- Approval Year (2019): The anticipated approval year for the Project is 2019. An approval year analysis was conducted to determine the Project's impacts on intersections for the Project approval year of 2019. This analysis conservatively applies vehicle trips generated by full buildout of the Project to the intersection operating conditions in 2019. However, it should be noted that Project development would be phased over a 20-year period and full buildout of the Project would not occur in 2019. Nonetheless this scenario was analyzed in fulfillment of CEQA's requirement that the Project's impacts on the "existing" environment be disclosed.

  To develop the baseline Approval Year scenario without the Project, the land use file in the TDFM was updated to include the development projects that were completed between the time of the baseline traffic counts (2016) and Approval Year (2019). These projected traffic volumes, referred to as Approval Year No Project projections, represent the conditions expected during the Project's Approval Year and provide the baseline for the Approval Year plus Project vehicle trip impact analysis. Appendix D1 of the TIA lists the cumulative projects included in the Approval Year (2019) land use forecasts. Figure 3-1 in Chapter 3, *Description of Environmental Setting*, in this EIR maps the locations of these related projects.

- Interim Year (2031): Since the Project would be completed over the course of 20 years, an interim year analysis was conducted to determine impacts on intersections when the Project is partially completed. An analysis of the Project's impacts on intersections was conducted for the interim year of 2031. This year reflects the completion of Stages A1-A3 for Phasing Plan A and Stages B1-B3 for Phasing Plan B of the Project.

  To develop the baseline Interim Year (2031) forecasts without development of the Project, vehicle trip forecasts were first made for Year 2025, assuming full buildout of projects on the City's list of approved and pending development projects. Traffic volumes for Year 2031 were estimated by interpolating between 2025 and 2040. To develop the Interim Year (2031) forecasts with development of the Project, Project trips generated by partial buildout of the Project was added to 2031 baseline vehicle trip volumes on the roadway network.

- Future Year (2042): The Project is anticipated to be built out in 2042. To develop the Future Year (2042) forecasts, the vehicle trip forecasts for Year 2040 were utilized from the City's

TDFM. The 2040 forecasts are based on the long-term socio-economic and land use data from the LUCE and, for areas outside of the City, the SCAG land use data. Vehicle trip volumes for year 2042 were estimated by increasing the 2040 volumes by 0.5% per year, based on SCAG's long-term estimates of growth in population and employment for this area.

Once the above vehicle trip projections were developed, analyses were conducted to determine the effect of the Project. The Project vehicle trips as described below was added to the Approval Year (2019) No Project scenario, Interim Year (2031), and Future Year (2042) No Project projections to form the Approval Year plus Project (2019) and Future Years plus Project (2031 and 2042) vehicle trip projection scenarios respectively. Appendix D2 of the TIA lists the cumulative projects included in the Future Year land use forecasts (which are the same in the 2031 and 2042 scenarios). Figure 3-2 in Chapter 3 maps the locations of these cumulative projects.

The difference between No Project and Plus Project scenarios represents the incremental changes in vehicle trips attributable to the Project itself.

Two phasing or sequencing plans (Phasing Plan A and Phasing Plan B) for development of Phase II of the Master Plan have been prepared by the applicant. The differences affect the order in which Project elements S1, S2, S3, 2C and 2I would be constructed. In each case, however, the overall level of development in the interim analysis year (2031) and the future analysis year (2042) would be identical. For that reason, the analysis in this section is valid for both Phasing Plan A and Phasing Plan B.

Project Trip Generation

Trip generation rates for most of the Project's land uses are derived from the TDFM *Trip Generation Rates*. This includes the hospital, day care, residential, restaurant, medical office, retail, and office uses. The trip generation rates applied account for implementation of a TDM program.

The inbound-outbound split of trips in each peak hour are based on data in ITE 2012 *Trip Generation Manual, 9th Edition*. The directional splits for the hospital are from #610 hospital, for the residential and hotel uses are from #220 Apartments, for the restaurant are from #932 high-turnover restaurant, for the medical office are from #720 medical office, for the retail space are from #820 shopping center, and for the office are from #710 general office building. Trip generation rates and directional splits for the Day Care Center land use were derived from the ITE 2012 *Trip Generation Manual, 9th Edition*, land use #565 Day Care Center.

The Project's restaurant and retail uses, as well as the visitor housing and day care are ancillary to the main medical care functions on the site and are primarily intended to serve Project employees and visitors. Therefore, an internal capture reduction of 50% was applied to the gross trip generation estimates for these uses. The internal capture rate accounts for the non-auto trips to/from the hospital as well as other surrounding land uses.

The Project would remove/redevelop the existing uses on the site, including the Child & Family Development Center (CFDC) and Daycare, MRI buildings, the Saint John's Foundation office building, and the John Wayne Cancer Institute. Therefore, trips from these existing uses are subtracted (i.e., credited) from the total Project trip generation estimates. The existing 10-unit

apartment building on Site S4 would also be removed; however, since this building is vacant and does not generate vehicle trips, no credit was taken.

As described in Chapter 2, Project Description, of this EIR, there are two phasing plans for the proposed Project: Phasing Plan A and Phasing Plan B. Total Project trip generation would be the same for both phasing plans within each of the analyzed scenarios: Interim Year (2031) and Future Year (2042).

The estimated trip generation for the Project under Phasing Plan A is shown in **Table 4.17-11**, *Project Trip Generation Estimates – Phasing Plan A*. The estimated trip generation for the Project under Phasing Plan B is shown in **Table 4.17-12**, *Project Trip Generation Estimates – Phasing Plan B*. At the end of Phases A1, A2 and A3, planned to occur by 2031, the Project would be expected to generate a net increase of approximately 353 weekday AM peak hour trips (240 inbound and 113 outbound) and 410 weekday PM peak hour trips (147 inbound and 263 outbound), as shown in Table 4.17-11. Alternatively, Phases B1, B2, and B3 would generate the same number of Project trips by 2031 as shown in Table 4.17-12. Upon full buildout and occupancy of the Project, when Phases A4 and A5, or B4 and B5, would be occupied in 2042, total net new trip generation is estimated to be approximately 641 trips in the AM peak hour (421 inbound and 220 outbound) and 754 trips in the PM peak hour (282 inbound and 472 outbound), as shown in Tables 4.17-11 and 4.17-12.

Project Trip Distribution and Assignment

The geographic distribution of trips generated by the Project is dependent on characteristics of the street system serving the Project Site, the level of accessibility of routes to and from the Project Site, and the locations of residential areas from which employees and patients would be drawn. Vehicle trip generated by the Project was estimated and assigned with consideration of the planned changes in site access and parking, the location of the site in the context of the surrounding street system, and ZIP code data provided by PSJHC on the distribution of employees and patients. For this analysis, aggregated data on existing PSJHC staff home zip codes and patient home zip codes was used to determine existing origins for trips coming to and leaving from the Project. Details regarding the overall distribution pattern for this analysis are provided in the TIA.

On-site parking for the Campus is currently provided in several parking structures and lots spread across the Campus. The Campus also relies, in part, on leased off-site parking supplies to supplement the on-site parking supply. Off-site parking is located in the Held Parking Structure and Koll Garage located west of the medical center, at Saint Anne's Church, located southwest of the Campus and at the Colorado Center, located to the east. Upon build-out of the Project, the on-site parking supply is planned to be sufficient to accommodate its needs, resulting in redistribution of existing trips as well as accommodating the projected increase in trips.

The existing baseline vehicle trip counts were reviewed together with information on the distribution and use of the current parking supply to determine where the location of existing trips that would be shifted to the on-site parking in the future. Project vehicle trips were assigned based on the proposed vehicle access and circulation diagram included later in this section. The information described above was used to assign the Project-generated vehicle trips to the study intersections, as shown in Appendix B2 of the TIA.

TABLE 4.17-11
PROJECT TRIP GENERATION ESTIMATES – PHASING PLAN A

Building	Land Use [a]	Trip Generation Land Use	Size[i]	Unit	Daily Rate	AM Peak Hour Rate	AM Peak Hour % In	AM Peak Hour % Out	PM Peak Hour Rate	PM Peak Hour % In	PM Peak Hour % Out	Weekday Trips	AM Peak Hour Trips In	AM Peak Hour Trips Out	AM Peak Hour Trips Total	PM Peak Hour Trips In	PM Peak Hour Trips Out	PM Peak Hour Trips Total
Phase A1																		
S1	Child and Family Development	Hospital	25.500 ksf		16.33	1.07	63%	37%	1.24	38%	62%	**416**	**17**	**10**	**27**	**12**	**20**	**32**
	Day Care [b]	Day Care (from ITE 565)	73 students		4.09	0.78	53%	47%	0.79	47%	53%	299	30	27	57	27	31	58
	Internal Capture [c]				*50%*	*50%*			*50%*			*(150)*	*(15)*	*(14)*	*(29)*	*(14)*	*(15)*	*(29)*
	New Trips											**149**	**15**	**13**	**28**	**13**	**16**	**29**
S2	Multifamily Housing	Multifamily Two or more cars	10 units		6.44	0.42	20%	80%	0.46	65%	35%	**64**	**1**	**3**	**4**	**3**	**2**	**5**
	Internal Capture [d]				50%	50%			50%			(32)	0	(2)	(2)	(2)	(1)	(3)
	New Trips											**32**	**1**	**1**	**2**	**1**	**1**	**2**
	Neighborhood Commercial	Restaurant	0.8 ksf		81.24	3.64	55%	45%	5.53	60%	40%	65	2	1	3	2	2	4
	Internal Capture [e]				50%	50%			50%			(33)	(1)	(1)	(2)	(1)	(1)	(2)
	New Trips											**32**	**1**	**0**	**1**	**1**	**1**	**2**
S3	Hospital/Health Care and Medical Research	Hospital	118 ksf		16.33	1.07	63%	37%	1.24	38%	62%	**1,927**	**79**	**47**	**126**	**55**	**91**	**146**
	Neighborhood Commercial/Restaurant	Restaurant	5 ksf		81.24	3.64	55%	45%	5.53	60%	40%	406	10	8	18	17	11	28
	Internal Capture [e]				*50%*	*50%*			*50%*			*(203)*	*(5)*	*(4)*	*(9)*	*(8)*	*(6)*	*(14)*
	New Trips											**203**	**5**	**4**	**9**	**9**	**5**	**14**
		Phase A1 Gross New										**2,759**	**118**	**75**	**193**	**91**	**134**	**225**
	Existing to be Removed																	
S1/S3	*MRI Buildings*	*Hospital to be removed*	*(2.675) ksf*		*16.33*	*1.07*	*63%*	*37%*	*1.24*	*38%*	*62%*	***(44)***	***(2)***	***(1)***	***(3)***	***(1)***	***(2)***	***(3)***
2I	*Existing Day Care [b]*	*Day Care (from ITE 565)*	*(61) students*		*4.09*	*0.78*	*53%*	*47%*	*0.79*	*47%*	*53%*	(249)	(25)	(23)	(48)	(23)	(25)	(48)
					50%	*50%*			*50%*									
	Internal Capture [c]											*125*	*13*	*11*	*24*	*11*	*13*	*24*
	New Trips											**(124)**	**(12)**	**(12)**	**(24)**	**(12)**	**(12)**	**(24)**
		Phase A1 Existing to be Removed										**(168)**	**(14)**	**(13)**	**(27)**	**(13)**	**(14)**	**(27)**
		Phase A1 Net New										**2,591**	**104**	**62**	**166**	**78**	**120**	**198**
Phase A2																		
2I	Medical Office	Medical Office	50 ksf		29.7	2.26	79%	21%	2.45	28%	72%	**1,485**	**89**	**24**	**113**	**34**	**89**	**123**
	Neighborhood Commercial or Health Related Services [g]	Retail	4.5 ksf		40.64	1.81	62%	38%	2.8	48%	52%	183	5	3	8	6	7	13
	Internal Capture				*50%*	*50%*			*50%*			*(92)*	*(2)*	*(2)*	*(4)*	*(3)*	*(4)*	*(7)*
	New Trips											**91**	**3**	**1**	**4**	**3**	**3**	**6**
		Phase A2 Gross New										**1,576**	**92**	**25**	**117**	**37**	**92**	**129**
	Existing to be Removed																	

Building	Land Use [a]	Trip Generation Land Use	Size[i]	Unit	Daily Rate	AM Peak Hour Rate	AM Peak Hour % In	AM Peak Hour % Out	PM Peak Hour Rate	PM Peak Hour % In	PM Peak Hour % Out	Weekday Trips	AM Peak Hour Trips In	AM Peak Hour Trips Out	AM Peak Hour Trips Total	PM Peak Hour Trips In	PM Peak Hour Trips Out	PM Peak Hour Trips Total
S4	*John Wayne Cancer Institute*	*Hospital to be removed*	*(51.055)*	*ksf*	*16.33*	*1.07*	*63%*	*37%*	*1.24*	*38%*	*62%*	***(834)***	***(35)***	***(20)***	***(55)***	***(24)***	***(39)***	***(63)***
		Phase A2 Net New										**742**	**57**	**5**	**62**	**13**	**53**	**66**
Phase A3																		
2C	Hospital/Health Care	Hospital	112 ksf															
	Neighborhood Commercial	Retail	5.5 ksf		16.33	1.07	63%	37%	1.24	38%	62%	**1,829**	**76**	**44**	**120**	**53**	**86**	**139**
					40.64	1.81	62%	38%	2.8	48%	52%	224	6	4	10	7	8	15
	Internal Capture [c]				*50%*	*50%*			*50%*			*(112)*	*(3)*	*(2)*	*(5)*	*(4)*	*(4)*	*(8)*
	New Trips											**112**	**3**	**2**	**5**	**3**	**4**	**7**
		Phase A3 Net New										**1,941**	**79**	**46**	**125**	**56**	**90**	**146**
		2031 Interim Gross New										6,276	289	146	435	184	316	500
		2031 Interim Year Total to be Removed										*(1,002)*	*(49)*	*(33)*	*(82)*	*(37)*	*(53)*	*(90)*
		2031 Net New										5,274	240	113	353	147	263	410
Phase A4																		
S4	Education & Conference Center	Office [h]	8.65 ksf		10.15	0.8	88%	12%	0.89	17%	83%	88	6	1	7	1	7	8
	Hospital/Health Care, Health & Wellness Center, Medical Research	Hospital	180.35 ksf		16.33	1.07	63%	37%	1.24	38%	62%	2,945	122	71	193	85	139	224
	Neighborhood Commercial	Retail	8.2 ksf		40.64	1.81	62%	38%	2.8	48%	52%	333	9	6	15	11	12	23
	Internal Capture [e]				*50%*	*50%*			*50%*			*(167)*	*(5)*	*(3)*	*(8)*	*(6)*	*(6)*	*(12)*
	New Trips											**166**	**4**	**3**	**7**	**5**	**6**	**11**
	Neighborhood Commercial or Restaurant	Restaurant	1.8 ksf		81.24	3.64	55%	45%	5.53	60%	40%	146	4	3	7	6	4	10
	Internal Capture [e]				*50%*	*50%*			*50%*			*(73)*	*(2)*	*(2)*	*(4)*	*(3)*	*(2)*	*(5)*
	New Trips											**73**	**2**	**1**	**3**	**3**	**2**	**5**
	Saint John's Café	Restaurant	0.9 ksf		81.24	3.64	55%	45%	5.53	60%	40%	73	2	1	3	3	2	5
	Internal Capture [e]				*50%*	*50%*			*50%*			*(37)*	*(1)*	*(1)*	*(2)*	*(2)*	*(1)*	*(3)*
	New Trips											**36**	**1**	**0**	**1**	**1**	**1**	**2**
S5	Visitor Housing	Multifamily One Car	34 units		3.82	0.25	20%	80%	0.28	65%	35%	130	2	7	9	7	3	10
	Internal Capture [d]				*50%*	*50%*			*50%*			*(65)*	*(1)*	*(4)*	*(5)*	*(3)*	*(2)*	*(5)*
	New Trips											**65**	**1**	**3**	**4**	**4**	**1**	**5**
		Phase A4 Net New										**3,373**	**136**	**79**	**215**	**99**	**156**	**255**
Phase A5																		
2D/E	Hospital/Health Care	Hospital	75.5 ksf		16.33	1.07	63%	37%	1.24	38%	62%	1,233	51	30	81	36	58	94
	Neighborhood Commercial	Retail	3 ksf		40.64	1.81	62%	38%	2.8	48%	52%	122	3	2	5	4	4	8
	Internal Capture				*50%*	*50%*			*50%*			*(61)*	*(2)*	*(1)*	*(3)*	*(2)*	*(2)*	*(4)*
	New Trips											**61**	**1**	**1**	**2**	**2**	**2**	**4**
		Restaurant	1.5 ksf		81.24	3.64	55%	45%	5.53	60%	40%	122	3	2	5	5	3	8

Building	Land Use [a]	Trip Generation Land Use	Size[i]	Unit	Daily Rate	AM Peak Hour Rate	AM Peak Hour % In	AM Peak Hour % Out	PM Peak Hour Rate	PM Peak Hour % In	PM Peak Hour % Out	Weekday Trips	AM Peak Hour Trips In	AM Peak Hour Trips Out	AM Peak Hour Trips Total	PM Peak Hour Trips In	PM Peak Hour Trips Out	PM Peak Hour Trips Total
					50%	*50%*			*50%*			*(61)*	*(2)*	*(1)*	*(3)*	*(2)*	*(2)*	*(4)*
	Mullin Plaza											**61**	**1**	**1**	**2**	**3**	**1**	**4**
	Internal Capture																	
	New Trips	**Phase A5 Gross New**										**1,355**	**53**	**32**	**85**	**41**	**61**	**102**
2D/E	Existing to be Removed *Foundation - Hospital/Health Care and Medical Research*	*Hospital to be removed*	*(10.800)*	*ksf*	*16.33*	*1.07*	*63%*	*37%*	*1.24*	*38%*	*62%*	*(176)*	*(8)*	*(4)*	*(12)*	*(5)*	*(8)*	*(13)*
		Phase A5 Net New										**1,179**	**45**	**28**	**73**	**36**	**53**	**89**
		Total Project (2042) Gross New										11,004	478	257	735	324	533	857
		Total Project (2042) Existing to be Removed										*(1,178)*	*(57)*	*(37)*	*(94)*	*(42)*	*(61)*	*(103)*
		Total Project (2042) Net New										9,826	421	220	641	282	472	754

Notes:

a. Allowable land uses are defined in the Development Agreement.

d. The housing provided by the Project is intended to serve visitors to the hospital. It is estimated that half of the residents/temporary residents' trips are non-auto trips to/from the hospital

e. The retail and restaurant services provided by the Project are primarily intended to serve Project employees and visitors. The internal capture rate accounts for the non-auto trips to/from the hospital as well as other surrounding land use

h. The use of the office rate is conservative for the education and conference center, which would provide auditorium/meeting space for health care-related conferences, meetings, seminars, workshops, etc. The center would not be used for trade and consumer shows or industry meetings not related to health care.

i. The sum of the permitted floor area/units per use are subject to the overall maximum floor areas/units per Vested Use in accordance with the DA as it is proposed to be amended (discussed in Section 2.6.2 of the Draft EIR). For some buildings, the sum of the maximum floor areas for the Vested Uses that may occur within the building exceeds that overall building's floor area in order to allow some flexibility for establishing the eventual location and the not-to-exceed amount of certain Vested Uses within the Phase II buildings.

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019.

TABLE 4.17-12
PROJECT TRIP GENERATION ESTIMATES – PHASING PLAN B

Building	Land Use [a]	Trip Generation Land Use	Size	Unit	Daily Rate	AM Peak Hour Rate	AM Peak Hour % In	AM Peak Hour % Out	PM Peak Hour Rate	PM Peak Hour % In	PM Peak Hour % Out	Weekday Trips	AM Peak Hour Trips In	AM Peak Hour Trips Out	AM Peak Hour Trips Total	PM Peak Hour Trips In	PM Peak Hour Trips Out	PM Peak Hour Trips Total
Phase B1																		
S2	Multifamily Housing	Multifamily Two or more cars	10 units		6.44	0.42	20%	80%	0.46	65%	35%	**64**	**1**	**3**	**4**	**3**	**2**	**5**
	Internal Capture [d]				50%	50%			50%			(32)	0	(2)	(2)	(2)	(1)	(3)
	New Trips											**32**	**1**	**1**	**2**	**1**	**1**	**2**
	Neighborhood Commercial	Restaurant	0.8 ksf		81.24	3.64	55%	45%	5.53	60%	40%	65	2	1	3	2	2	4
	Internal Capture [e]				50%	50%			50%			(33)	(1)	(1)	(2)	(1)	(1)	(2)
	New Trips											**32**	**1**	**0**	**1**	**1**	**1**	**2**
2C	Hospital/Health Care	Hospital	112 ksf		16.33	1.07	63%	37%	1.24	38%	62%	**1,829**	**76**	**44**	**120**	**53**	**86**	**139**
	Neighborhood Commercial	Retail	5.5 ksf		40.64	1.81	62%	38%	2.8	48%	52%	224	6	4	10	7	8	15
	Internal Capture [c]				*50%*	*50%*			*50%*			*(112)*	*(3)*	*(2)*	*(5)*	*(4)*	*(4)*	*(8)*
	New Trips											**112**	**3**	**2**	**5**	**3**	**4**	**7**
		Phase B1 Net New										**2,005**	**81**	**47**	**128**	**58**	**92**	**150**
Phase B2																		
S1	Child and Family Development	Hospital	25.500 ksf		16.33	1.07	63%	37%	1.24	38%	62%	**416**	**17**	**10**	**27**	**12**	**20**	**32**
	Day Care [b]	Day Care (from ITE 565)	73 students		4.09	0.78	53%	47%	0.79	47%	53%	299	30	27	57	27	31	58
	Internal Capture [c]				*50%*	*50%*			*50%*			*(150)*	*(15)*	*(14)*	*(29)*	*(14)*	*(15)*	*(29)*
	New Trips											**149**	**15**	**13**	**28**	**13**	**16**	**29**
S3	Hospital/Health Care and Medical Research	Hospital	118 ksf		16.33	1.07	63%	37%	1.24	38%	62%	**1,927**	**79**	**47**	**126**	**55**	**91**	**146**
	Neighborhood Commercial/Restaurant	Restaurant	5 ksf		81.24	3.64	55%	45%	5.53	60%	40%	406	10	8	18	17	11	28
	Internal Capture [e]				*50%*	*50%*			*50%*			*(203)*	*(5)*	*(4)*	*(9)*	*(8)*	*(6)*	*(14)*
	New Trips											**203**	**5**	**4**	**9**	**9**	**5**	**14**
		Phase B2 Gross New										**2,695**	**116**	**74**	**190**	**89**	**132**	**221**
	Existing to be Removed																	
S4	*John Wayne Cancer Institute*	*Hospital to be removed*	*(51.055) ksf*		*16.33*	*1.07*	*63%*	*37%*	*1.24*	*38%*	*62%*	***(834)***	***(35)***	***(20)***	***(55)***	***(24)***	***(39)***	***(63)***
S1/S3	*MRI Buildings*	*Hospital to be removed*	*(2.675) ksf*		*16.33*	*1.07*	*63%*	*37%*	*1.24*	*38%*	*62%*	***(44)***	***(2)***	***(1)***	***(3)***	***(1)***	***(2)***	***(3)***
		Phase B2 Existing to be Removed										**(878)**	**(37)**	**(21)**	**(58)**	**(25)**	**(41)**	**(66)**

Building	Land Use [a]	Trip Generation Land Use	Size	Unit	Daily Rate	AM Peak Hour Rate	AM Peak Hour % In	AM Peak Hour % Out	PM Peak Hour Rate	PM Peak Hour % In	PM Peak Hour % Out	Weekday Trips	AM Peak Hour Trips In	AM Peak Hour Trips Out	AM Peak Hour Trips Total	PM Peak Hour Trips In	PM Peak Hour Trips Out	PM Peak Hour Trips Total
		Phase B2 Net New										**1,817**	**79**	**53**	**132**	**64**	**91**	**155**
Phase B3																		
2I	Medical Office	Medical Office	50 ksf		29.7	2.26	79%	21%	2.45	28%	72%	**1,485**	**89**	**24**	**113**	**34**	**89**	**123**
	Neighborhood Commercial or Health Related Services [g]	Retail	4.5 ksf		40.64	1.81	62%	38%	2.8	48%	52%	183	5	3	8	6	7	13
	Internal Capture				*50%*	*50%*			*50%*			*(92)*	*(2)*	*(2)*	*(4)*	*(3)*	*(4)*	*(7)*
	New Trips											**91**	**3**	**1**	**4**	**3**	**3**	**6**
		Phase B3 Gross New										**1,576**	**92**	**25**	**117**	**37**	**92**	**129**
	Existing to be Removed																	
2I	*Existing Day Care [b]*	*Day Care (from ITE 565)*	*(61) students*		*4.09*	*0.78*	*53 %*	*47%*	*0.79*	*47 %*	*53%*	(249)	(25)	(23)	(48)	(23)	(25)	(48)
	Internal Capture [c]				*50%*	*50%*			*50%*			*125*	*13*	*11*	*24*	*11*	*13*	*24*
	New Trips											**(124)**	**(12)**	**(12)**	**(24)**	**(12)**	**(12)**	**(24)**
		Phase B3 Net New										**1,452**	**80**	**13**	**93**	**25**	**80**	**105**
		2031 Interim Gross New										6,276	289	146	435	184	316	500
		2031 Interim Year Total to be Removed										*(1,002)*	*(49)*	*(33)*	*(82)*	*(37)*	*(53)*	*(90)*
		2031 Net New										5,274	240	113	353	147	263	410
Phase B4																		
S4	Education & Conference Center	Office [h]	8.65 ksf		10.15	0.8	88%	12%	0.89	17%	83%	88	6	1	7	1	7	8
	Hospital/Health Care, Health & Wellness Center, Medical Research	Hospital	180.35 ksf		16.33	1.07	63%	37%	1.24	38%	62%	2,945	122	71	193	85	139	224
	Neighborhood Commercial	Retail	8.2 ksf		40.64	1.81	62%	38%	2.8	48%	52%	333	9	6	15	11	12	23
	Internal Capture [e]				*50%*	*50%*			*50%*			*(167)*	*(5)*	*(3)*	*(8)*	*(6)*	*(6)*	*(12)*
	New Trips											**166**	**4**	**3**	**7**	**5**	**6**	**11**
	Neighborhood Commercial or Restaurant	Restaurant	1.8 ksf		81.24	3.64	55%	45%	5.53	60%	40%	146	4	3	7	6	4	10
	Internal Capture [e]				*50%*	*50%*			*50%*			*(73)*	*(2)*	*(2)*	*(4)*	*(3)*	*(2)*	*(5)*
	New Trips											**73**	**2**	**1**	**3**	**3**	**2**	**5**
	Saint John's Café	Restaurant	0.9 ksf		81.24	3.64	55%	45%	5.53	60%	40%	73	2	1	3	3	2	5
	Internal Capture [e]				*50%*	*50%*			*50%*			*(37)*	*(1)*	*(1)*	*(2)*	*(2)*	*(1)*	*(3)*
	New Trips											**36**	**1**	**0**	**1**	**1**	**1**	**2**
S5	Visitor Housing	Multifamily One Car	34 units		3.82	0.25	20%	80%	0.28	65%	35%	130	2	7	9	7	3	10
	Internal Capture [d]				*50%*	*50%*			*50%*			*(65)*	*(1)*	*(4)*	*(5)*	*(3)*	*(2)*	*(5)*
	New Trips											**65**	**1**	**3**	**4**	**4**	**1**	**5**

Building	Land Use [a]	Trip Generation Land Use	Size	Unit	Daily Rate	AM Peak Hour Rate	AM Peak Hour % In	AM Peak Hour % Out	PM Peak Hour Rate	PM Peak Hour % In	PM Peak Hour % Out	Weekday Trips	AM Peak Hour Trips In	AM Peak Hour Trips Out	AM Peak Hour Trips Total	PM Peak Hour Trips In	PM Peak Hour Trips Out	PM Peak Hour Trips Total
		Phase B4 Net New										**3,373**	**136**	**79**	**215**	**99**	**156**	**255**
Phase B5																		
2D/E	Hospital/Health Care	Hospital	75.5 ksf		16.33	1.07	63%	37%	1.24	38%	62%	1,233	51	30	81	36	58	94
	Neighborhood Commercial	Retail	3 ksf		40.64	1.81	62%	38%	2.8	48%	52%	122	3	2	5	4	4	8
	Internal Capture				*50%*	*50%*			*50%*			*(61)*	*(2)*	*(1)*	*(3)*	*(2)*	*(2)*	*(4)*
	New Trips											**61**	**1**	**1**	**2**	**2**	**2**	**4**
	Mullin Plaza	Restaurant	1.5 ksf		81.24	3.64	55%	45%	5.53	60%	40%	122	3	2	5	5	3	8
	Internal Capture				*50%*	*50%*			*50%*			*(61)*	*(2)*	*(1)*	*(3)*	*(2)*	*(2)*	*(4)*
	New Trips											**61**	**1**	**1**	**2**	**3**	**1**	**4**
		Phase B5 Gross New										**1,355**	**53**	**32**	**85**	**41**	**61**	**102**
	Existing to be Removed																	
2D/E	*Foundation - Hospital/Health Care and Medical Research*	*Hospital to be removed*	*(10.800) ksf*		*16.33*	*1.07*	*63%*	*37%*	*1.24*	*38%*	*62%*	*(176)*	*(8)*	*(4)*	*(12)*	*(5)*	*(8)*	*(13)*
		Phase B5 Net New										**1,179**	**45**	**28**	**73**	**36**	**53**	**89**
		Total Project (2042) Gross New										11,004	478	257	735	324	533	857
		Total Project (2042) Existing to be Removed										*(1,178)*	*(57)*	*(37)*	*(94)*	*(42)*	*(61)*	*(103)*
		Total Project (2042) Net New										9,826	421	220	641	282	472	754

Notes:
[a] Allowable land uses are defined in the Development Agreement.
[b] Proposed day care is 9,000 square feet. Existing day care is 6,362 square feet.
[c] The internal capture rate accounts for the approximately 50% of day care users expected to be internal to the hospital (i.e., children of PSJHC employees)
[d] The housing provided by the Project is intended to serve visitors to the hospital. It is estimated that half of the resident/temporary resident trips are non-auto trips to/from the hospital
[e] The retail and restaurant services provided by the Project are primarily intended to serve Project employees and visitors. The internal capture rate accounts for the non-auto trips to/from the hospital as well as other surrounding land use
[f] The restaurant rate is used to be conservative.
[g] The retail rate is used to be conservative.

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019.

Street Segment Operations Analysis

In consultation with the City of Santa Monica staff, 17 street segments in the Project vicinity were selected for analysis as indicated in Figure 4.17-3. These segments were selected based on their locations along routes anticipated to be used as access routes between the Project Site and the surrounding City and region. A street segment impact analysis was performed at each of these intersections to assess the impacts of the Project on operations along these street segments. New weekday daily vehicle trip volume counts (ADT) were collected at these locations in the fall of 2016. The count data is provided in Appendix A2 of the TIA. The City of Santa Monica significance impact criteria identified in Table 4.17-10 where then applied to the Existing (2018) Plus Project scenario to determine whether Project operational vehicle trips would result in exceedance of these impact criteria.

Regional Transportation System Analysis

A regional facilities (CMP) traffic impact analysis was conducted for the Project in accordance with the procedures outlined in the *2010 Congestion Management Program for Los Angeles County*. The analysis of Project impacts on regional facilities is based on a comparison of the number of trips that would be generated by the Project at CMP facilities to the CMP's screening criteria for these facilities (e.g., the addition of 50 or more trips during either the AM or PM weekday peak hours at CMP arterial monitoring locations, and the addition of 150 or more trips during either the AM or PM weekday peak hours at CMP mainline freeway monitoring locations). Additional analysis was conducted if the Project exceeded this criterion.

Regional Transit Analysis

The CMP requires that, when an EIR is prepared for a project, traffic impact analysis be conducted for the impacts of the project's vehicle trips on CMP facilities including designated arterial monitoring intersections and mainline freeway monitoring locations. The CMP arterial monitoring intersections within the traffic study area are: Lincoln Boulevard & Santa Monica Boulevard (study intersection 4), Cloverfield Boulevard & Santa Monica Boulevard (study intersection 47), 26th Street & Wilshire Boulevard (study intersection 60), Bundy Drive & Santa Monica Boulevard (study intersection 77), and Lincoln Boulevard & Pico Boulevard (not a study intersection). The mainline freeway monitoring locations nearest to the Project Site are I-10 at Lincoln Boulevard (station 1010), I-10 east of Overland Avenue (station 1011), and I-405 north of Venice Boulevard (station 1070).

CMP transit impact analysis was conducted for the Project. Potential increases in transit person trips generated by the Project were estimated using the methodology in Section D.8.4 of the CMP, which provides a methodology for estimating the number of transit trips expected to result from a proposed project based on the projected number of vehicle trips. The CMP methodology assumes an Average Vehicle Ridership (AVR) factor of 1.4 in order to estimate the number of person trips to and from the Project; however, the City's TDM Ordinance establishes a AVR target of 2.0 for the Health Care Mixed Use District. Therefore, both AVRs are applied to estimate the range of person trips anticipated. Once person trips are estimated, the CMP provides guidance regarding the percent of persons trips assigned to public transit depending on the type of use (commercial/other versus residential) and the proximity to transit services. To estimate Project-generated transit trips, person trips should be multiplied by one of these factors:

3.5 percent of Total Person Trips Generated for most cases, except:

- 10% primarily Residential within ¼ mile of a CMP transit center
- 15% primarily Commercial within ¼ mile of a CMP transit center
- 7% primarily Residential within ¼ mile of a CMP multi-modal transportation center
- 9% primarily Commercial within ¼ mile of a CMP multi-modal transportation center
- 5% primarily Residential within ¼ mile of a CMP transit corridor
- 7% primarily Commercial within ¼ mile of a CMP transit corridor
- 0% if no fixed-route transit services operate within one mile of the Project Site

These three types of exceptions are defined in the CMP:

- CMP Transit Center – Transit Centers are defined as:
  - Passenger Rail Stations such as those along the Metro Rail Red, Blue and Green Lines, and commuter rail stations served by Metrolink, and
  - Major Bus Transfer Centers served by at least eight bus lines, including fixed-route shuttles, providing a sheltered waiting area, signage with a listing of bus routes to the center, and bus bays restricted to bus use.
- CMP Multi-Modal Transportation Center – Multi-Modal Transportation Centers are described in detail on pages F-36 and F-37 of the 2002 CMP. Qualifying criteria include dedicated park and ride spaces; maximum headways of 30 minutes for at least two peak period bus, rail, or shuttle services; pedestrian standards; bicycle standards; and standards for access and waiting areas.
- CMP Transit Corridor – Transit Corridors consist of a series of transit nodes where frequent transit activity occurs. A transit node is defined as the intersection of two bus lines or fixed-route shuttles, each with an evening peak hour headway of 10 minutes or less.

The standard rate of 3.5 percent was used to analyze Project impacts on transit, because the Project is neither primarily residential nor commercial and meets the parameters of a medical facility, as defined in Appendix E of the 2010 Congestion Management Program.

Hazards Due to Design Features Analysis

The analysis evaluates whether the Project would result in hazards due to design features by determining whether the Project would include curved streets with inadequate view distances, not separate vehicular and pedestrian bicycle traffic, and not provide adequate pedestrian crosswalks at intersections.

Emergency Access Analysis

The emergency access analysis evaluates whether the Project would comply with City emergency access requirements including those imposed by the Santa Monica Fire Department regarding adequate turning radii on streets, response distances to buildings, etc.

4.17.4.3 Project Characteristics

As detailed in Chapter 2, Project Description, of this EIR, the Project would demolish the existing medical buildings, vacant 10-unit apartment building, and surface parking at the Project Site, and develop in their place new medical buildings, 30-34 visitor housing units, 10 replacement multi-family housing units, structured parking, and enhanced vehicular, bicycle, and pedestrian circulation connections. The Project would be developed in five phases, with construction anticipated to commence in 2019 and be completed by 2041 (with full occupancy anticipated in 2042). Figures 2-3, 2-5 and 2-7 in Chapter 2 of this EIR show the site plan, proposed new streets/circulation, and proposed new parking locations, respectively.

The Project would include circulation improvements on and around the Campus that would be implemented over time as part of the Project's development program. The Project includes pedestrian improvements, including widened sidewalks along Santa Monica Boulevard and Broadway, new crosswalks and pedestrian overcrossings across Broadway and Santa Monica Boulevard, new open space areas to encourage pedestrian activity throughout the Campus, and improvements to the pedestrian network within the Campus. The Project also includes new bicycle connections throughout the Campus that would link to the dedicated bicycle lanes on Broadway.

New Circulation Improvements

As indicated in Figure 2-5, *Proposed Vehicle and Bicycle Circulation*, in Chapter 2, *Project Description*, of this EIR, the Project includes two new driveways on the South Campus from Santa Monica Boulevard and one new driveway from Broadway. The Project also includes a short new southbound street, tentatively called 20th Place, and a new east-west street between 21st Street and 20th Place, tentatively called Saint John's Way.

The new streets and driveways on the South Campus would allow for vehicular access for the South Campus to be provided on PSJHC property, rather than directly from Santa Monica Boulevard or Broadway. In addition, the Mullin Plaza driveways on Santa Monica Boulevard would be relocated/widened to align with the new South Campus East Driveway and South Campus West Driveway (described below).

South Campus West Driveway

South Campus West Driveway, including the relocated traffic signal at its intersection with Santa Monica Boulevard, would be created as part of development on Site S3 (described above). South Campus West Driveway is a new two-way north-south driveway that would run from Santa Monica Boulevard to the subterranean parking garage located on the west side of the South Campus. South Campus West Driveway includes the following:

- Vehicles: South Campus West Driveway would be a two-way driveway that provides vehicular access to/from Santa Monica Boulevard and the subterranean parking garage beneath the South Campus sites. Except for emergency and service/logistics vehicles, there would generally be no through access for vehicles between Broadway and Santa Monica Boulevard. A controlled access mechanism (approved by SMFD) would be located on South Campus West Driveway immediately south of the entrance to the subterranean parking garage to allow for emergency access. A commercial loading area is provided in the area between the controlled access mechanism and 20th Place.

- Pedestrians: South Campus West Driveway would include a sidewalk on its east side to promote pedestrian circulation from Santa Monica Boulevard to the South Campus. The sidewalk would continue to Broadway along the new 20th Place (described below), creating better pedestrian connectivity through the South Campus (including to the new open space areas on the South Campus) and between the Expo Light Rail Stations and overall Campus. New signalized crosswalks would be provided on the east and west sides of the relocated intersection of Santa Monica Boulevard and South Campus West Driveway to provide a pedestrian connection between the North and South Campuses.

- Bicycles: South Campus West Driveway would be shared with bicycles and provide bicycle access to the South Campus, including to short-term and long-term bicycle parking.

20th Place

20th Place would be created as part of the development on Site S1 (described above), the new Child & Family Development Center. 20th Place is proposed as a new north-south oriented street that would run from Saint John's Way to Broadway (described below) and include the following:

- Vehicles: 20th Place would be a one-way southbound street from Saint John's Way to Broadway. 20th Place would serve the proposed S1 building. Emergency and service/logistics vehicles would also be able to utilize 20th Place for north/south access between Santa Monica Boulevard to Broadway via the South Campus West Driveway.

- Pedestrians: 20th Place would include sidewalks to promote pedestrian circulation from Broadway to the South Campus. The sidewalk on the east side of 20th Place would continue to Santa Monica Boulevard (along South Campus West Driveway), creating better pedestrian connectivity through the South Campus (including to the new open space areas on the South Campus) and between the Expo Light Rail Stations and overall Campus. A new crosswalk would be provided on the east side of the new intersection of 20th Place and Broadway to provide a pedestrian connection between the South Campus and the Expo Light Rail Stations.

- Bicycles: 20th Place would be a shared street with bicycles and provide access from the South Campus and the existing residential buildings on 21st Street to the dedicated bicycle lanes on Broadway.

Saint John's Way

Saint John's Way would be created as part of development on Site S1 (described above), the new Child & Family Development Center. Saint John's Way is proposed as a short east-west connecting street that would run from the revised 21st Street (described below) to the new 20th Place. This street would include:

- Vehicles: Saint John's Way would be a one-way, westbound street that provides vehicular access from 21st Street to 20th Place. Saint John's Way would primarily be used by residents of and visitors to the existing residential buildings on 21st Street and those using the passenger loading areas for the Child & Family Development Center (S1).

- Pedestrians: Saint John's Way would include sidewalks to promote pedestrian circulation through the South Campus, including to the new open space areas.

Intersection, Street Segment, and CMP Facility Operations

Impact Statement TR-2b: The Project would exceed City of Santa Monica (HCM) and City of Los Angeles (CMA) operational level of service thresholds at multiple study intersections and street segments during each of the traffic analysis scenarios (2019, 2031, and 2042), including at a total of 14 intersections and six street segments in 2042.[2] As no mitigation is available to reduce these impacts to less than significant levels, significant unavoidable operational intersection and street segment level of service impacts would occur. Other potential conflicts with applicable programs, plans, ordinances and policies addressing the circulation system (e.g., CMP facilities) would be less than significant.

Intersection Operations

Approval Year (2019) Plus Project

As shown in **Table 4.17-15**, *Approval Year (2019) Intersection Level of Service – City of Santa Monica (HCM) Methodology*, of the 83 analyzed intersections, the following five study intersections would be significantly impacted by the Project under the HCM methodology:

26. 20th Street & Arizona Avenue (LOS C becoming LOS D in the PM peak hour)
42. 23rd Street & Arizona Avenue (LOS C becoming LOS D in the PM peak hour)
50. Cloverfield Boulevard & Colorado Avenue (LOS E in the PM peak hour)
74. Centinela Avenue & I-10 Westbound On-Off Ramps (LOS F in the AM peak hour)
80. Bundy Drive & Ocean Park Boulevard (LOS F in the AM and PM peak hours)

At some intersections, the vehicle delay during the Approval Year (2019) is shown in Table 4.17-13 to decrease slightly even as Project trips are added. This is possible under the HCM analysis methodology due to how additional trips affect the weighted calculation of total intersection delay.

As shown in **Table 4.17-16**, *Approval Year (2019) Intersection Level of Service – City of Los Angeles (CMA) Methodology*, 17 intersections are located in or shared with the City of Los Angeles. As indicated, the following two study intersections would be significantly impacted by the Project under the CMA methodology:

70. Centinela Avenue & Santa Monica Boulevard (LOS C during the AM peak hour and LOS B becoming LOS C during the PM peak hour)
82. Barrington Avenue & Wilshire Boulevard (LOS D in the AM peak hour)

The above analysis is evaluated in fulfillment of CEQA's requirement that the Project's impacts on the "existing" environment be disclosed - Project development would be phased over a 20-year period, and full buildout of the Project would not occur until 2041 (with full occupancy anticipated in 2042).

[2] If appropriate approvals are granted by the City of Los Angeles (and by Caltrans in the case of Intersection 81) in conjunction with MM-TR-1 through MM-TR-4, impacts at Intersections 70, 77, and 81 would be mitigated to less than significant levels (e.g., 10 rather than 14 intersections would be significant unavoidably impacted).

- Bicycles: Southeast Driveway would be shared with bicycles and provide bicycle access to the South Campus including connecting the existing dedicated bicycle lanes on Broadway to and through the South Campus.

Service Access Road

As indicated in Figure 2-5, *Proposed Vehicular and Bicycle Access*, in Chapter 2, Project Description, of this EIR, a new north-south service access road is proposed running from the southern terminus of the South Campus East Driveway to the northern terminus of the proposed Southeast Driveway.

- Vehicles: Service Access Road would be a two-way service road that provides emergency and service/logistics vehicles with through access between Santa Monica Boulevard and Broadway.
- Pedestrians: Southeast Driveway would include a sidewalk on its east side to promote pedestrian circulation from Broadway (including from the S2 building and open space on the east side of the Southeast Driveway) to/from the South Campus. The west side of the Service Access Road is open space that also provides pedestrian circulation from Broadway to/from the South Campus and between the Expo Light Rail Stations and overall Campus.
- Bicycles: Service Access Road would be shared with bicycles and provide bicycle access to the South Campus, including connecting the existing dedicated bicycle lanes on Broadway (via the Southeast Driveway) to and through the South Campus.

Revisions to Existing Public Streets

21st Street

The Project calls for the revision of 21st Street. The northern portion of 21st Street would be vacated and closed for normal vehicular access as part of development on Site S3 and after the new Saint John's Way and southern portion of the new 20th Place are opened for vehicular access. As part of the development on Site S4, the northern portion of 21st Street would be incorporated into the new Saint John's Square.

Remaining/Southern Portion of 21st Street

- Vehicles: After the new Saint John's Way and the new 20th Place are opened for vehicular access, the remaining/southern portion of 21st Street would become a northbound one-way street up to Saint John's Way and a two-way street between Saint John's Way and its northern end. The remaining/southern portion of 21st Street would primarily serve the residential buildings on the east side of 21st Street and those using the passenger loading areas for the Child & Family Development Center (S1). The remaining/southern portion of 21st Street would have approximately 19 metered parallel parking spaces distributed between both sides of the street. No changes to the existing curb cuts for the residential buildings located on the east side of 21st Street (not owned by PSJHC) are proposed.
- Pedestrians: The remaining/southern portion of 21st Street would include sidewalks to promote pedestrian circulation between Broadway and the South Campus, creating better pedestrian connectivity through the South Campus (including to the new open space areas on the South Campus) and between the Expo Light Rail Stations and the Campus.

- Bicycles: The remaining/southern portion of 21st Street would provide shared bicycle access for (1) the existing residences on 21st Street to the existing dedicated bicycle lanes on Broadway (via Saint John's Way) and (2) from Broadway to new bicycle parking on the South Campus.

Vacated Portion of 21st Street:

After S4 is completed, the only vehicles that would be allowed to access the northern portion of 21st Street would be emergency vehicles.

20th Street

The Project includes the potential for modifications to 20th Street between Santa Monica Boulevard and Arizona Avenue. Subject to City review and approval, the vehicle lane configurations on 20th Street between Santa Monica Boulevard and Arizona Avenue may be modified to include a center two-way left-turn lane.

Santa Monica Boulevard

The Project calls for the relocation of the two existing traffic signals located at the ingress and egress to the North Campus Mullin Plaza, as follows:

- The existing traffic signal located at the intersection of the North Campus Mullin Plaza ingress driveway and Santa Monica Boulevard would be shifted to the east to align with the new South Campus East Driveway.
- The existing traffic signal located at the intersection of the North Campus Mullin Plaza egress driveway/21st Street and Santa Monica Boulevard would be shifted to the west to align with the new South Campus West Driveway.

The Project may also propose increasing the width of Santa Monica Boulevard by approximately 10 feet to add a short-term passenger loading area on the south side of Santa Monica Boulevard between the new South Campus East Driveway and 21st Street. Such a proposal would be subject to City review and approval.

New Intersections

The above improvements would result in four new intersections as listed below:

34. 20th Place & Santa Monica Boulevard (signalized)
35. 20th Place & Broadway (two-way stop controlled)
39. 22nd Street & Santa Monica Boulevard (signalized)
40. 22nd Street and Broadway (two-way stop-controlled)

Parking

With regard to parking, as indicated in Figure 2-7, *Proposed Vehicular Parking*, in Chapter 2 of this EIR, the Project would construct a new parking structure on the east side of 20th Street where the existing Child Care Center is located. Subterranean parking structures would be located both south and north of Santa Monica Boulevard, with vehicular access focused on Santa Monica Boulevard at two signalized intersections. The existing exit-only driveway onto Schader Drive

would be closed to vehicles. A total of 2,285 on-site parking spaces is proposed, with parking to be provided in phases as necessary to meet demand.

Phasing

Two phasing or sequencing plans for development of Phase II of the Master Plan have been prepared by the applicant. The differences affect the order in which Project elements S1, S2, S3, 2C and 2I would be constructed. In each case, however, the overall level of development in the interim analysis year (2031) and the future analysis year (2042) would be identical. For that reason, the analysis in this section is valid for both Phasing Plan A and Phasing Plan B.

Project Design Features

The following Project Design Features (PDFs) are proposed to minimize the transportation impacts of the Project:

PDF-TR-1 (Construction Traffic Management Plan): The Applicant shall prepare, implement, and maintain a Construction Traffic Management Plan (Plan) to address construction traffic, parking, access and safety impacts during the construction period. The Plan shall be submitted to the City for review and approval prior to the issuance of grading permits, and be designed to accomplish the following:

- Reduce construction traffic impacts on the surrounding street network;
- Minimize construction parking impacts;
- Ensure traffic safety and emergency around the Project Site during the construction period;
- Prevent substantial construction truck traffic through residential neighborhoods; and
- Provide for coordination of Project construction activities with those of nearby construction projects.

The Plan shall include the following at a minimum:

<u>Ongoing Requirements Throughout the Duration of Construction:</u>

- Implementation of a detailed work zone plan for temporary lane, sidewalk, and bicycle lane closures (e.g., flagmen, directional signage, etc.). The Plan shall include specific information regarding the Project's construction activities that may disrupt normal pedestrian and traffic flow, and the measures to address these disruptions. Further, the Plan shall address construction parking and impacts to existing parking in adjacent off-site areas. The Plan shall be reviewed and approved by the Traffic Engineering Division prior to commencement of construction and implemented in accordance with this approval.
- Any work within the public right-of-way (ROW) shall be performed between 9:00 AM and 4:00 PM. This work includes dirt and demolition material hauling and construction material delivery. Work within the public ROW outside of these hours shall only be allowed with under an after-hours construction permit.
- Streets and equipment shall be cleaned in accordance with established Public Works Department requirements.

- Trucks shall only travel on a City-approved construction route. Truck queuing/staging shall not be allowed on Santa Monica streets. Limited queuing may occur on the construction site itself.
- Materials and equipment shall be minimally visible to the public; the preferred location for materials is to be onsite, with a minimum amount of materials within a work area in the public ROW, subject to a current Use of Public Property Permit.
- Any requests for work before or after normal construction hours within the public ROW shall be subject to review and approval through the After Hours Permit process administered by the Building and Safety Division.
- Provision of off-street parking for construction workers, which may include the use of a remote location with shuttle transport to the site, if determined necessary by the City of Santa Monica.

Project Coordination Elements That Will Be Implemented Prior to Commencement of Construction:

- The Applicant shall advise the traveling public of impending construction activities (e.g., information signs, portable message signs, media listing/notification, and implementation of an approved Plan).
- The Applicant shall obtain a Use of Public Property Permit, Excavation Permit, Sewer Permit, or Oversize Load Permit, as well as any Caltrans permits required, for any construction work requiring encroachment into public rights- of-way, detours, or any other work within the public ROW.
- The Applicant shall provide timely notification of construction schedules to all affected agencies (e.g., Metro. Big Blue Bus, Police Department, Fire Department, Public Works Department, and Planning and Community Development Department) and to all owners and residential and commercial tenants of property within a radius of 500 feet.
- The Applicant shall coordinate construction work with affected agencies in advance of start of work. Approvals may take up to two weeks per each submittal. Coordination with Metro regarding construction activities that may impact Metro bus lines or result in closures lasting over six months shall be initiated at least 30 days in advance of construction activities.
- The Applicant shall obtain Transportation Engineering Division approval of any haul routes for earth, concrete, or construction materials and equipment hauling.

PDF-TR-2 (TDM): The Applicant shall implement TDM measures so as to not exceed the trip generation estimates calculated for the Future Years (2031 and 2042) in Tables 4.17-11 and 4.7-12 of the EIR.

The specific TDM strategies to be implemented by the developer shall be finalized as part of the Development Agreement process. It is anticipated that the following TDM strategies will be implemented and/or maintained: a TDM Coordinator; Transportation Management Association (TMO); transit pass subsidies provided to employees by the Project Applicant; ridesharing (carpools and vanpools); parking pricing; Guaranteed Ride Home (GRH); bicycle facilities; carshare service; bicycle sharing areas; transportation information center and TDM website information; pedestrian wayfinding signage; and commuter club.

To ensure that the trip generation estimates calculated for the Interim Year (2031) and Future Year (2042) in Table 4.17-11 are not exceeded, a period of annual monitoring and reporting shall be undertaken for the Project and incorporated into the Development Agreement. The Applicant shall summarize the results of the trip monitoring program, determine whether trip reduction goals and/or Average Vehicle Ridership (AVR) targets are being achieved, and describe the TDM efforts in place to reduce vehicular trip making, in an annual report delivered to the City. The City, at its discretion, shall determine the type of enforcement and may require implementation of additional TDM strategies and possible monetary (or other) penalties if annual monitoring determines that the trip generation estimates are being exceeded and/or that AVR targets are not being met.

4.17.4.4 Project Impacts

Consistency with Circulation Plans/Programs/Ordinances/Policies

Impact TR-1: *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

Impact Statement TR-1: The Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, impacts regarding consistency with circulation plans/programs/ ordinances/policies would be less than significant.

Section 4.17.3.4, Local Regulations, above, provides a listing of City transportation policies established in the SCAG's RTP/SCS, and City's LUCE, the Santa Monica Bike Action Plan, Pedestrian Action Plan, and SMMC that address the circulation system. Consistency of the Project with such City policies and regulations is also discussed in more detail in Section 4.11, *Land Use and Planning*, of this EIR; as well as in Section 4.8, *Greenhouse Gas Emissions*.

The Project would include mixed-use medical, commercial, and residential development on the Campus. The primary goals of the LUCE and SCAG's 2016 RTP/SCS with regard to alternative transportation in Santa Monica are focused on shifting trips away from single-occupancy vehicles to more sustainable modes of travel such as transit, bicycling, and walking. To achieve this goal, the LUCE encourages the development of mixed-use communities with attractive and safe bicycle and pedestrian facilities that are also well connected to high-capacity and frequent transit service. The Project would support the LUCE policies that encourage alternative transportation. Specifically, the Project would: (1) represent a mixed-use development and the intensification of urban density on an infill site in proximity to transit (including two Metro rail stations and multiple bus lines); (2) include pedestrian improvements along Santa Monica Boulevard and Broadway (such as widened sidewalks), improvements to the on-site pedestrian network, and new bicycle parking and connections to the dedicated bike lanes Broadway; and (3) implement a TDM program (PDF-TR-2) to encourage the use of alternative transportation and reduce single occupancy vehicle trips and VMT as much as possible. See Tables 4.17-13, *Project Consistency with SCAG RTP/SCS*, and 4.17-4, *Project Consistency with Transportation Policies of LUCE*, for analysis of Project consistency with the specific circulation goals and policies of the SCAG's 2016 RTP/SCS and LUCE.

TABLE 4.17-13
PROJECT CONSISTENCY WITH SCAG RTP/SCS

Policy	Relationship to Project
SCAG Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS)	
RTP Goal: Maximize the productivity of our transportation system.	Consistent. The Project would support and maximize the productivity of the transportation system by locating new medical, retail/restaurant, childcare, and housing uses in the City of Santa Monica, within walking distance of the Expo LRT 17th Street/SMC station. Employees and visitors to the Project site would have the opportunity to use the Expo LRT. Additionally, per the City's Transportation Demand Ordinance, the Project would implement a Transportation Demand Management (TDM) plan to increase alternative transportation usage and to further improve the productivity of the regional transportation system.
RTP Goal: Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	Consistent. The Project site is located in an urban infill area and along the Santa Monica Boulevard corridor, near existing public transit opportunities provided by the Expo LRT. Additionally, the Project site is easily accessible via bike on the Broadway bicycle lanes. Therefore, Project employee, visitors, and residents would have easy access to alternative transportation options. Project development would promote a land use pattern that would facilitate transit and non-motorized transportation.
SCS Goal 1. Better Placemaking: The strategies outlined in the RTP/SCS promote the development of better places to live and work through measures that encourage more compact development, varied housing options, bike and pedestrian improvements, and efficient transportation infrastructure.	Consistent. The Project is a compact, infill project near the Expo LRT 17th Street/SMC station and would provide bike and pedestrian improvements
SCS Goal 5: Improved Access and Mobility: Strategies contained within the 2016–2040 RTP/SCS will help the region confront congestion and mobility issues in a variety of ways, including improvements to bicycle and pedestrian facilities. Land use strategies in the RTP/SCS will improve mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them.	Consistent. The Project would support improved access and mobility by providing new medical-related uses within walking distance of the Expo LRT 17th Street/SMC station and in close proximity to bicycle lanes on Broadway. Additionally, bus lines that service the Project Site are Big Blue Bus Lines 1, 4, 10, and Metro Lines 1 and 704. The majority of these lines have service frequency or headways of 30 minutes or less, with peak-hour headways of 8 to 15 minutes.
SCAG Compass/ Growth Visioning Principles	
To realize the Growth Vision Principles, the Growth Vision encourages:	
(1) Focusing growth in existing and emerging centers and along major transportation corridors.	Consistent. The Project Site is located along the Santa Monica Boulevard corridor. The Project Site is within walking distance of the Expo LRT 17th Street/SMC station.
(2) Creating significant areas of mixed use development and walkable communities.	Consistent. The Project would develop a mix of uses in the Health Care Mixed Use district in proximity to a variety of commercial and residential uses.
(3) Targeting growth around existing and planned transit stations.	Consistent. The Project Site is located along the Santa Monica Boulevard corridor, where the Expo LRT runs. Specifically, the Project Site is located within walking distance (less than ¼ mile) of the 17th Street/SMC station for the Expo LRT.
(4) Preserving existing open space and stable residential areas.	Consistent. The Project would not develop or encroach onto existing open space and stable residential areas.

SOURCE: ESA, 2019.

TABLE 4.17-14
PROJECT CONSISTENCY WITH TRANSPORTATION POLICIES OF LUCE

LUCE	
Policy LU2.4: Create diverse housing options along the transit corridors and in the activity centers, replacing some commercial potential with additional affordable and workforce housing, and encouraging affordable workforce housing near the transit stations.	Consistent. The Project would provide 10 units of replacement Multifamily Housing (including 2 units of affordable housing) and up to 34 units of visitor housing, consistent with the existing DA. The housing would be located near transit stations and would primarily serve PSJHC.
Policy LU2.5: Vehicle Trip Reduction. Achieve vehicle trip reduction through comprehensive strategies that designate land uses, establish development and street design standards, implement sidewalk, bicycle, and roadway improvements, expand transit service, manage parking, and strengthen TDM programs that support accessibility by transit, bicycle, and foot, and discourage vehicle trips at a district-wide level. Monitor progress using tools that integrate land use and transportation factors. Increase bicycle and pedestrian connectivity in transit districts and adjust bus and shuttle services to ensure success of the transit system.	Consistent. The Project would integrate land use and transportation and reduce vehicle trips by providing new development near two Expo Light Rail stations, near bus lines along Santa Monica Boulevard and 20th Street, and new bicycle connections to the dedicated bicycle lane on Broadway. Furthermore, the Project would include widened sidewalks along Santa Monica Boulevard and Broadway and new open space areas (i.e., South Garden, Sun Garden, Woodland Garden, Saint John's Square, and Mullin Plaza) and a Wellness Walk to encourage pedestrian activity. In addition to the open space areas, the Mullin Plaza Café, Saint John's Café, and ground floor Health-Related Services, Restaurant, or Neighborhood Commercial Uses would provide activity centers for meeting or shopping. The Project would provide 10 units of replacement Multifamily Housing (including 2 units of affordable housing) and up to 34 units of visitor housing, consistent with the existing DA. The housing would be located near transit stations and would primarily serve PSJHC, which would serve to minimize vehicle trips. As part of the Phase II Master Plan, a comprehensive, shared parking program and TDM program (for both Phase I and Phase II) would continue to be implemented to manage parking and reduce vehicle trips. The potential TDM measures that would be implemented under Phase II are discussed in PDF-TR-2.
LU4.3 Pedestrian-Oriented Design. Engage pedestrians with ground floor uses, building design, site planning, massing and signage that promote vibrant street life and emphasize transit and bicycle access.	Consistent. Phase II buildings have yet to be designed in detail; however, consistent with the LUCE and Zoning Ordinance, it can be expected that buildings would be designed to engage and invite pedestrians. The Project would include landscaped setbacks, widened sidewalks, Mullin Plaza, Saint John's Square, and internal pedestrian networks to provide residents, employees, and visitors with an inviting pedestrian environment. Within the South Campus, the Project would provide for meandering pedestrian paths that would connect open space areas. The pedestrian paths would connect to the North Campus, thus creating a pedestrian-oriented environment. Outdoor dining could be accommodated as part of the Mullin Plaza Café and Saint John's Café in close proximity to Santa Monica Boulevard. In addition to the widened sidewalks along Santa Monica Boulevard, there would be new/relocated signalized intersections at the west and east sides of Santa Monica Boulevard and South Campus West Driveway, and the west and east sides of Santa Monica Boulevard and South Campus East Driveway.
Policy LU7.4: Allow responsible expansion of the hospitals and medical uses that is sensitive to the surrounding residential neighborhoods and coordinated with a comprehensive TDM and trip reduction strategies. *Policy LU8.1: Transportation Demand Management.* Require participation in TDM programs for projects above the base to encourage walking, biking, and transit, and to reduce vehicle trips. Engage existing development in TDM Districts and programs to encourage reduction of existing vehicle trips.	Consistent. In accordance with the City's TDM Ordinance, the Project applicant would implement a TDM plan designed to achieve a 2.0 AVR target, and the Project applicant must agree to yearly monitoring, reporting and enforcement if needed. The TDM plan for the Project would establish trip reduction. The potential TDM measures that would be implemented under Phase II are discussed in PDF-TR-2, including on-site transportation information, and transit pass subsidies.
LU15.1 Create Pedestrian-Oriented Boulevards. Orient the City's auto-dependent boulevards to be inviting avenues with wider sidewalks, improved transit, distinctive architecture, landscaping, trees, planted medians and neighborhood–friendly services—defining a new sense of place where local residents will be attracted to shop, work, live and play.	Consistent. The Project would provide new and more attractive streetscapes to improve the pedestrian-orientation of the adjacent streets. In some cases, new street trees and landscaping would be planted along with the installation of pedestrian amenities. Where possible, outdoor dining may be provided for restaurants facing the street.

Santa Monica Boulevard Policies	
Policy B8.1: Design new development along Broadway to complement the streets function as a cycling route through the City.	Consistent. The Project would include new bicycle connections to the dedicated bicycle lanes on Broadway from the proposed shared bicycle lanes along South Campus West Driveway/20th Place, South Campus East Driveway/Southeast Driveway, and 21st Street via Saint John's Way.
Circulation Element	
Policy T8.4: Design buildings to prioritize pedestrian access from the street, rather than from a parking lot.	Consistent. The Project would remove existing surface parking lots and construct new buildings with primary pedestrian access provided on the ground floor along the main street frontages.
Policy T15.1: Reduce automobile trips starting or ending in Santa Monica, especially during congested periods, with the goal of keeping peak period trips at or below 2009 levels.	Consistent. See Policy LU2.5
Policy T15.7: Monitor and coordinate construction activity to minimize disruption on the transportation system.	Consistent. A Construction Impact Mitigation Plan would be prepared to address transportation impacts from demolition, site preparation, and ongoing construction activities. Components of the plan would include measures to address vehicular and pedestrian safety, notification of local business, identification of construction parking, construction traffic and route design, and construction scheduling. The Construction Impact Mitigation Plan would be subject to approval by the City prior to issuance of a building permit. The approved mitigation plan would be posted and available at the Project Site for the duration of construction and would be produced upon request.
Policy T19.2: Impose appropriate Transportation Demand Management (TDM) requirements for new development.	Consistent. In accordance with the City's TDM Ordinance, the project's applicant would implement a TDM plan designed to achieve a 2.0 AVR target, and the project applicant must agree to yearly monitoring, reporting and enforcement if needed. The TDM plan for the Project would establish trip reduction strategies, including on-site transportation information, and transit pass subsidies.
Policy T21.3: TDM program requirements shall be triggered for new development consistent with the LUCE performance standards.	Consistent. See discussion for Policy T19.2.
Policy T25.2: Require that parking be accessed only from alleys, where alley access is available.	Consistent. Primary vehicular site access to the subterranean garages for the South Campus would be provided off new driveways such as South Campus East Driveway and South Campus West Driveway, Southeast Driveway, 20th Place, and new 21st Street. Although the Project would provide new driveways, the proposed driveways would enhance circulation and minimize transportation impacts on the main streets.
Policy T25.3: Minimize the width and number of driveways at individual development projects.	

SOURCE: ESA, 2019.

Bike Action Plan: The Project would not conflict with the City's Bike Action Plan. The Project has been designed to minimize impacts on existing bicycle facilities. For example, 21st Street is limited to northbound traffic only and 20th Place is limited to southbound traffic only to minimize potential vehicle conflicts with the Broadway bike lanes. The Project also includes new bicycle connections throughout the Campus that would link to the dedicated bicycle lanes on Broadway. Furthermore, the Project would not physically interfere with any future bicycle projects identified in the Bike Action Plan. The Project would also not conflict with the City's goals/policies to increase bicycling in the City. Rather, the Project would encourage employees to bike through implementation of a TDM plan and the provision of on-site bicycle amenities such as bike lockers and showers.

Pedestrian Action Plan: The Project would not conflict with the Pedestrian Action Plan. The Project would include landscaped setbacks, widened sidewalks, Mullin Plaza, Saint John's Square,

and internal pedestrian networks to provide residents, employees, and visitors with an inviting pedestrian environment. Within the South Campus, the Project would provide for meandering pedestrian paths that would connect open space areas. The pedestrian paths would connect to the North Campus, thus creating a pedestrian-oriented environment.

Outdoor dining could be accommodated as part of the Mullin Plaza Café and Saint John's Café in close proximity to Santa Monica Boulevard. In addition to the widened sidewalks along Santa Monica Boulevard, there would be new/relocated signalized intersections at the west and east sides of Santa Monica Boulevard and South Campus West Driveway, and the west and east sides of Santa Monica Boulevard and South Campus East Driveway. The Project would also not conflict with the City's goals/policies to increase walking in the City. Rather, the Project would encourage employees to walk to the site through implementation of a TDM plan.

Santa Monica Municipal Code: The Project would be implemented through a Development Agreement, and as such, would be subject to the standards and requirements set forth within the DA rather than the SMMC. However, the Project would provide at least the minimum number of bicycle parking, bicycle storage/lockers, EV vehicle charging spaces as required by the SMMC (actual number would likely be greater, which will be determined as part of the DA). With respect to parking, the total parking supply number will be determined as part of the DA, but the Project would be required to provide parking to meet anticipated parking needs based on a parking demand study that would be updated from time to time and subject to City approval. Furthermore, the Project Applicant would be required to provide a greater contribution of transportation impact fees (TIF) to fund for City transportation improvements plans and projects. Therefore, the Project would not conflict with the SMMC such that a significant adverse impact to transportation would occur.

Vehicle Miles Traveled

***Impact TR-2**: Would the project conflict or be inconsistent with CEQA Guidelines Section 15064, Subdivision (b)?*

Impact Statement TR-2a: The Project would result in per capita VMT that is lower than existing Citywide per Capita VMT rate, and would not conflict with CEQA Guidelines Section 15064, Subdivision (b). Therefore, less than significant VMT impacts would occur.

The Project Site lies within the greater PSJHC, which is located in a transit priority area. The Project Site is approximately ½-mile from the Expo 17th Street Station and is accessible via 9 bus lines within ¼ mile. Additionally, the Project would develop at a FAR greater than 0.75, would not exceed parking requirements, and is consistent with the SCS (as described in Section 4.11 Land Use and Planning, of this EIR). Therefore, following OPR's 2019 CEQA Guidelines, new Section 15064.3, subdivision (b)(1), the Project would be presumed to have a less than significant transportation impact. Nonetheless, for informational purposes, a VMT analysis has been prepared.

The estimates of VMT for the proposed Project are based on the OPR guidance, which recommends evaluating each component of a mixed-use project independently. The predominant land use proposed in this Project is hospital, for which OPR does not provide explicit guidance. The

estimates of Project-related VMT are based on the trip generation estimates for the proposed Project presented in Tables 4.17-11 and 4.17-12.

The following steps were used to estimate VMT per worker and per non-worker for the Project, compared with 2013 model estimates of Citywide averages, and to estimate total Project VMT.

- Estimate daily trip generation of the Project. The Project is estimated to generate a total of 9,826 net new daily trips.
- Estimate the number of workers of the Project. Total net new employment under the Project would be 1,124 medical workers.
- Apply the average vehicle ridership (AVR) factor of 2.0, which is the AVR target established for this site per SMMUSD 9.53.040, resulting in an estimated 1,124 daily worker trips (1,124 workers each making a round trip with an AVR of 2.0).
- The TDFM includes data on the average daily trips, VMT, and trip length by trip purpose for each TAZ, as well as the Citywide averages. The Project is located in the Santa Monica TDFM TAZs 407 and 434. The average home-based work trip attraction in TAZs 407 and 434 is 12.8 miles, which is higher than the Citywide base year (2013) average of 12.1 miles. Base year model values were used for comparison, since the 2013 base is the most recent validated TDFM model run. An analysis of home zip codes for current hospital workers yielded an average VMT of 12.4, or 3% less than the model estimates.
- Multiply the estimated worker trips by the trip length, and divide by the number of workers to calculate average VMT per worker. Thus 1,124 worker trips of 12.8 miles each equals 14,387 total daily miles (roundtrip). This equates to 12.8 daily VMT per employee. This is about one-third less than the Citywide base year (2013) average of 19.3 daily VMT per employee. It is important to note that the City has implemented an ambitious TDM program to reduce the Citywide average VMT per employee, and the Project proposes its own TDM program (PDF-TR-2) to implement similar trip reduction measures under the proposed Project. In addition, the Project Site is accessible to the Expo Line, which provides light rail service from Santa Monica to downtown Los Angeles. The Expo Line began service west of Culver City in May 2016 and has significantly improved transit access in the City of Santa Monica.
- Estimate the number of non-worker trips to and from the Project. If 1,124 daily Project trips are made by medical workers, then the remaining 8,702 daily trips are made by patients and other non-workers.
- The average trip length for home-based other trip attractions and non-home-based trip attractions in TAZs 407 and 434 is 8.4 miles. An analysis of home zip codes for current hospital patients yielded an average VMT of 8.3. The average trip length for non-home-based trip productions in TAZs 407 and 434 is 4.0 miles. Applying these trip lengths to the estimated non-worker inbound (8.4 VMT * 8,702/2 non-worker inbound trips = 36,548 miles) and outbound trips (4.0 VMT * 8,702/2 non-worker outbound trips = 17,404 miles) yields an estimate of 53,952 miles per day. When added to the 14,387 estimated miles of medical worker trips per day, the net total daily VMT for the Project is estimated to be 68,340 miles.

As indicated above, with implementation of the proposed TDM program, the Project would result in per capita VMT that is less than the existing Citywide per capita VMT rate. Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064, Subdivision (b), and VMT impacts would be less than significant.

Intersection, Street Segment, and CMP Facility Operations

Impact Statement TR-2b: The Project would exceed City of Santa Monica (HCM) and City of Los Angeles (CMA) operational level of service thresholds at multiple study intersections and street segments during each of the traffic analysis scenarios (2019, 2031, and 2042), including at a total of 14 intersections and six street segments in 2042.2 As no mitigation is available to reduce these impacts to less than significant levels, significant unavoidable operational intersection and street segment level of service impacts would occur. Other potential conflicts with applicable programs, plans, ordinances and policies addressing the circulation system (e.g., CMP facilities) would be less than significant.

Intersection Operations

Approval Year (2019) Plus Project

As shown in **Table 4.17-15**, *Approval Year (2019) Intersection Level of Service – City of Santa Monica (HCM) Methodology*, of the 83 analyzed intersections, the following five study intersections would be significantly impacted by the Project under the HCM methodology:

26. 20th Street & Arizona Avenue (LOS C becoming LOS D in the PM peak hour)
42. 23rd Street & Arizona Avenue (LOS C becoming LOS D in the PM peak hour)
50. Cloverfield Boulevard & Colorado Avenue (LOS E in the PM peak hour)
74. Centinela Avenue & I-10 Westbound On-Off Ramps (LOS F in the AM peak hour)
80. Bundy Drive & Ocean Park Boulevard (LOS F in the AM and PM peak hours)

At some intersections, the vehicle delay during the Approval Year (2019) is shown in Table 4.17-13 to decrease slightly even as Project trips are added. This is possible under the HCM analysis methodology due to how additional trips affect the weighted calculation of total intersection delay.

As shown in **Table 4.17-16**, *Approval Year (2019) Intersection Level of Service – City of Los Angeles (CMA) Methodology*, 17 intersections are located in or shared with the City of Los Angeles. As indicated, the following two study intersections would be significantly impacted by the Project under the CMA methodology:

70. Centinela Avenue & Santa Monica Boulevard (LOS C during the AM peak hour and LOS B becoming LOS C during the PM peak hour)
82. Barrington Avenue & Wilshire Boulevard (LOS D in the AM peak hour)

The above analysis is evaluated in fulfillment of CEQA's requirement that the Project's impacts on the "existing" environment be disclosed - Project development would be phased over a 20-year period, and full buildout of the Project would not occur until 2041 (with full occupancy anticipated in 2042).

[2] If appropriate approvals are granted by the City of Los Angeles (and by Caltrans in the case of Intersection 81) in conjunction with MM-TR-1 through MM-TR-4, impacts at Intersections 70, 77, and 81 would be mitigated to less than significant levels (e.g., 10 rather than 14 intersections would be significant unavoidably impacted).

TABLE 4.17-15
APPROVAL YEAR (2019) INTERSECTION LEVEL OF SERVICE – CITY OF SANTA MONICA (HCM) METHODOLOGY

					Approval No Project			Approval With Project				
No.	Intersection	Class	Control Type	Peak Hour	V/C	Delay*	LOS	V/C	Delay*	LOS	V/C or Delay Change	Significant Impact?
1	Ocean Avenue & California Avenue	A	Signalized	AM	0.808	35	C	0.812	35	C	0	No
				PM	1.137	61	E	1.110	60	E	-1	No
2	Lincoln Boulevard & Wilshire Boulevard	A	Signalized	AM	0.439	21	C	0.442	21	C	0	No
				PM	0.532	23	C	0.534	24	C	1	No
3	Lincoln Boulevard & Arizona Avenue	A	Signalized	AM	0.345	16	B	0.350	16	B	0	No
				PM	0.412	19	B	0.424	20	B	1	No
4	Lincoln Boulevard & Santa Monica Boulevard	A	Signalized	AM	0.478	23	C	0.482	23	C	0	No
				PM	0.567	30	C	0.571	30	C	0	No
5	Lincoln Boulevard & Broadway	A	Signalized	AM	0.548	25	C	0.549	25	C	0	No
				PM	0.651	34	C	0.652	34	C	0	No
6	Lincoln Boulevard & Colorado Avenue	A	Signalized	AM	0.713	24	C	0.714	24	C	0	No
				PM	0.827	38	D	0.830	38	D	0	No
7	Lincoln Boulevard & Olympic Blvd/I-10 WB Off-Ramp	A	Signalized	AM	0.872	74	E	0.872	74	E	0	No
				PM	0.952	79	E	0.954	79	E	0	No
8	Lincoln Boulevard & I-10 EB On-Ramp	A	Signalized	AM	0.725	27	C	0.726	27	C	0	No
				PM	1.048	**	F	1.050	**	F	0.002	No
9	Lincoln Boulevard & Ocean Park Boulevard	A	Signalized	AM	0.760	45	D	0.761	45	D	0	No
				PM	0.731	43	D	0.733	43	D	0	No
10	11th Street & Santa Monica Boulevard	A	Signalized	AM	0.413	18	B	0.417	18	B	0	No
				PM	0.430	17	B	0.433	17	B	0	No
11	11th Street & Pico Boulevard	A	Signalized	AM	0.494	20	B	0.501	20	B	0	No
				PM	0.465	19	B	0.472	20	B	1	No
12	14th Street & Montana Avenue	C	Signalized	AM	0.516	16	B	0.524	16	B	0	No
				PM	0.477	15	B	0.487	15	B	0	No
13	14th Street & Wilshire Boulevard	A	Signalized	AM	0.466	16	B	0.479	16	B	0	No
				PM	0.518	18	B	0.532	18	B	0	No
14	14th Street & Arizona Avenue	C	Signalized	AM	0.381	13	B	0.405	13	B	0	No
				PM	0.696	25	C	0.715	27	C	2	No
15	14th Street & Santa Monica Boulevard	A	Signalized	AM	0.414	17	B	0.418	17	B	0	No
				PM	0.453	17	B	0.456	17	B	0	No
16	14th Street & Broadway	C	Signalized	AM	0.492	16	B	0.497	16	B	0	No
				PM	0.466	16	B	0.469	16	B	0	No
17	14th Street & Olympic Boulevard	A	Signalized	AM	0.421	16	B	0.431	16	B	0	No
				PM	0.514	16	B	0.524	16	B	0	No
18	17th Street & Montana Avenue	C	Signalized	AM	0.478	8	A	0.481	8	A	0	No
				PM	0.470	8	A	0.471	8	A	0	No
19	17th Street & Wilshire Boulevard	A	Signalized	AM	0.468	16	B	0.468	16	B	0	No
				PM	0.518	15	B	0.519	15	B	0	No
20	17th Street & Arizona Avenue	C	Signalized	AM	0.635	18	B	0.637	19	B	1	No
				PM	0.511	21	C	0.519	21	C	0	No
21	17th Street & Santa Monica Boulevard	A	Signalized	AM	0.451	17	B	0.457	17	B	0	No
				PM	0.515	17	B	0.528	18	B	1	No
22	17th Street & Broadway	C	Signalized	AM	0.480	16	B	0.490	16	B	0	No
				PM	0.493	16	B	0.504	16	B	0	No
23	20th Street & Montana Avenue (west)	C	Signalized	AM	0.364	6	A	0.377	6	A	0	No
				PM	0.403	6	A	0.417	6	A	0	No
24	20th Street & Montana Avenue (east)	C	Signalized	AM	0.430	7	A	0.442	7	A	0	No
				PM	0.410	7	A	0.428	7	A	0	No
25	20th Street & Wilshire Boulevard	A	Signalized	AM	0.562	17	B	0.573	18	B	1	No
				PM	0.539	20	B	0.549	20	C	0	No

No.	Intersection	Class	Control Type	Peak Hour	Approval No Project V/C	Approval No Project Delay*	Approval No Project LOS	Approval With Project V/C	Approval With Project Delay*	Approval With Project LOS	V/C or Delay Change	Significant Impact?
26	20th Street & Arizona Avenue	C	Signalized	AM	0.672	19	B	0.703	20	B	1	No
				PM	0.631	32	C	0.675	38	D	6	Yes
27	20th Street & Santa Monica Boulevard	A	Signalized	AM	0.629	32	C	0.683	34	C	2	No
				PM	0.559	30	C	0.611	32	C	2	No
28	20th Street & Broadway	C	Signalized	AM	0.512	17	B	0.536	17	B	0	No
				PM	0.540	17	B	0.572	17	B	0	No
29	20th Street & Colorado Avenue	A	Signalized	AM	0.588	19	B	0.608	20	C	1	No
				PM	0.460	16	B	0.476	16	B	0	No
30	20th Street & Olympic Boulevard	A	Signalized	AM	0.760	46	D	0.778	49	D	3	No
				PM	0.579	36	D	0.597	37	D	1	No
31	20th Street & I-10 EB Off-Ramp	A	Signalized	AM	0.523	26	C	0.539	28	C	2	No
				PM	0.534	24	C	0.541	24	C	0	No
32	20th Street & Delaware Avenue	C	Signalized	AM	0.369	9	A	0.375	9	A	0	No
				PM	0.563	12	B	0.570	12	B	0	No
33	20th Street & Pico Boulevard	A	Signalized	AM	0.611	28	C	0.616	29	C	1	No
				PM	0.654	84	F	0.658	99	F	0.004	No
34	20th Place & Santa Monica Boulevard	A	Signalized	AM				0.435	10	A		
				PM				0.454	13	B		
35	20th Place & Broadway	C	Two-way stop	AM				0.148	32	D		
				PM				0.178	34	D		
36	21st Street & Arizona Avenue	C	All-way stop	AM	0.403	10	A	0.450	10	B	0	No
				PM	0.748	16	C	0.818	19	C	3	No
37	21st Street & Broadway	C	Two-way stop	AM	0.197	28	D	0.008	9	A	-19	No
				PM	0.690	18	C	0.010	9	A	-9	No
38	22nd Street & Arizona Avenue	C	All-way stop	AM	0.440	11	B	0.496	11	B	0	No
				PM	0.630	13	B	0.694	15	B	2	No
39	22nd Street & Santa Monica Boulevard	A	Signalized	AM				0.502	12	B		
				PM				0.585	18	B		
40	22nd Street & Broadway	C	Two-way stop	AM				0.015	23	C		
				PM				0.022	21	C		
41	23rd Street & Wilshire Boulevard	A	Signalized	AM	0.528	12	B	0.544	13	B	1	No
				PM	0.540	13	B	0.574	14	B	1	No
42	23rd Street & Arizona Avenue	C	All-way stop	AM	0.547	15	B	0.666	19	C	4	No
				PM	0.771	19	C	0.962	35	D	16	Yes
43	23rd Street & Santa Monica Boulevard	A	Signalized	AM	0.581	17	B	0.692	20	C	3	No
				PM	0.474	9	A	0.541	10	B	1	No
44	23rd Street & Broadway	C	Two-way stop	AM	0.116	26	D	0.091	25	D	-1	No
				PM	0.148	27	D	0.166	27	D	0	No
45	23rd Street & Pico Boulevard	A	Signalized	AM	0.513	23	C	0.516	23	C	0	No
				PM	0.524	17	B	0.525	18	B	1	No
46	23rd Street & Ocean Park Boulevard	A	Signalized	AM	0.792	45	D	0.802	48	D	3	No
				PM	0.667	25	C	0.677	25	C	0	No
47	Cloverfield Boulevard & Santa Monica Boulevard	A	Signalized	AM	0.609	24	C	0.712	27	C	3	No
				PM	0.578	21	C	0.722	24	C	3	No
48	Cloverfield Boulevard & Broadway	A	Signalized	AM	0.468	17	B	0.496	18	B	1	No
				PM	0.471	17	B	0.517	18	B	1	No
49	Cloverfield Boulevard & Colorado Avenue	A	Signalized	AM	0.629	32	C	0.641	32	C	0	No
				PM	0.556	34	C	0.581	34	C	0	No
50	Cloverfield Boulevard & Olympic Boulevard	A	Signalized	AM	0.622	41	D	0.637	41	D	0	No
				PM	0.818	56	E	0.841	61	E	5	Yes
51	Cloverfield Boulevard & Michigan Avenue	A	Signalized	AM	0.576	26	C	0.580	26	C	0	No
				PM	0.795	26	C	0.819	28	C	2	No
52	Cloverfield Boulevard & I-10 WB Off-Ramp	A	Signalized	AM	0.467	32	C	0.501	37	D	5	No
				PM	0.916	36	D	0.942	44	D	8	No

No.	Intersection	Class	Control Type	Peak Hour	Approval No Project V/C	Approval No Project Delay*	Approval No Project LOS	Approval With Project V/C	Approval With Project Delay*	Approval With Project LOS	V/C or Delay Change	Significant Impact?
53	Cloverfield Boulevard & I-10 EB On-Ramp	A	Signalized	AM	0.604	20	C	0.605	20	C	0	No
				PM	1.018	42	D	1.047	47	D	5	No
54	Cloverfield Boulevard & Virginia Avenue	A	Signalized	AM	0.371	11	B	0.376	11	B	0	No
				PM	0.511	10	B	0.520	10	B	0	No
55	Cloverfield Boulevard & Pico Boulevard	A	Signalized	AM	0.627	42	D	0.639	44	D	2	No
				PM	0.697	33	C	0.707	33	C	0	No
56	Cloverfield Boulevard & Ocean Park Boulevard	A	Signalized	AM	0.462	9	A	0.464	9	A	0	No
				PM	0.465	15	B	0.474	15	B	0	No
57	24th Street & Montana Avenue	C	Signalized	AM	0.380	11	B	0.384	11	B	0	No
				PM	0.365	6	A	0.368	5	A	-1	No
58	26th Street & San Vicente Boulevard	A	Signalized	AM	0.626	45	D	0.632	45	D	0	No
				PM	0.635	41	D	0.638	41	D	0	No
59	26th Street & Montana Avenue	C	Signalized	AM	0.558	16	B	0.571	16	B	0	No
				PM	0.589	17	B	0.602	17	B	0	No
60	26th Street & Wilshire Boulevard	A	Signalized	AM	0.702	39	D	0.720	41	D	2	No
				PM	0.682	35	D	0.700	37	D	2	No
61	26th Street & Arizona Avenue	A	Signalized	AM	0.596	23	C	0.603	23	C	0	No
				PM	0.502	19	B	0.520	20	B	1	No
62	26th Street & Santa Monica Boulevard	A	Signalized	AM	0.630	35	D	0.669	36	D	1	No
				PM	0.625	35	D	0.658	36	D	1	No
63	26th Street & Broadway	A	Signalized	AM	0.643	19	B	0.643	19	B	0	No
				PM	0.632	19	B	0.642	19	B	0	No
64	26th Street & Colorado Avenue	A	Signalized	AM	0.470	24	C	0.473	24	C	0	No
				PM	0.618	34	C	0.625	34	C	0	No
65	26th Street & Olympic Boulevard	A	Signalized	AM	0.728	43	D	0.732	44	D	1	No
				PM	0.719	40	D	0.722	40	D	0	No
66	Yale Street & Wilshire Boulevard	A	Signalized	AM	0.499	11	B	0.505	11	B	0	No
				PM	0.483	10	B	0.486	11	B	1	No
67	Yale Street & Santa Monica Boulevard	A	Signalized	AM	0.558	14	B	0.593	14	B	0	No
				PM	0.437	11	B	0.468	11	B	0	No
68	Berkeley Street & Wilshire Boulevard	A	Signalized	AM	0.657	16	B	0.664	16	B	0	No
				PM	0.580	14	B	0.588	14	B	0	No
69	Centinela Avenue & Wilshire Boulevard	A	Signalized	AM	0.525	8	A	0.532	8	A	0	No
				PM	0.594	11	B	0.603	12	B	1	No
70	Centinela Avenue & Santa Monica Boulevard	A	Signalized	AM	0.763	22	C	0.827	34	C	12	No
				PM	0.721	21	C	0.783	25	C	4	No
71	Centinela Avenue & Broadway	A	Signalized	AM	0.564	14	B	0.588	15	B	1	No
				PM	0.630	16	B	0.653	16	B	0	No
72	Centinela Avenue & Olympic Boulevard (west int)	A	Signalized	AM	0.638	14	B	0.638	14	B	0	No
				PM	0.654	16	B	0.654	16	B	0	No
73	Centinela Avenue & Olympic Boulevard	A	Signalized	AM	0.588	23	C	0.598	23	C	0	No
				PM	0.516	17	B	0.528	17	B	0	No
74	Centinela Avenue & I-10 WB On-Off Ramps	A	Signalized	AM	0.812	92	F	0.823	94	F	0.011	Yes
				PM	0.763	46	D	0.775	46	D	0	No
75	Bundy Drive & Texas Avenue	A	Signalized	AM	0.556	14	B	0.563	14	B	0	No
				PM	0.778	24	C	0.804	26	C	2	No
76	Bundy Drive & Wilshire Boulevard	A	Signalized	AM	0.630	30	C	0.637	31	C	1	No
				PM	0.631	32	C	0.644	32	C	0	No
77	Bundy Drive & Santa Monica Boulevard	A	Signalized	AM	0.502	20	B	0.521	20	C	0	No
				PM	0.674	24	C	0.709	25	C	1	No
78	Bundy Drive & Ohio Avenue	A	Signalized	AM	0.493	16	B	0.503	16	B	0	No
				PM	0.476	17	B	0.494	17	B	0	No
79	Bundy Drive & Olympic Boulevard	A	Signalized	AM	0.753	55	D	0.760	55	E	0	Yes
				PM	0.789	49	D	0.808	50	D	1	No

No.	Intersection	Class	Control Type	Peak Hour	Approval No Project V/C	Approval No Project Delay*	Approval No Project LOS	Approval With Project V/C	Approval With Project Delay*	Approval With Project LOS	V/C or Delay Change	Significant Impact?
80	Bundy Drive & Ocean Park Boulevard	A	Signalized	AM	0.872	**	F	0.876	**	F	0.004	No
				PM	0.845	**	F	0.851	**	F	0.006	Yes
81	Bundy Drive & I-10 EB On-Ramp	A	Signalized	AM	0.752	17	B	0.764	18	B	1	No
				PM	0.725	35	C	0.751	43	D	8	No
82	Barrington Avenue & Wilshire Boulevard	A	Signalized	AM	0.810	45	D	0.827	50	D	5	No
				PM	0.661	34	C	0.721	40	D	6	No
83	Barrington Avenue & Santa Monica Boulevard	A	Signalized	AM	0.617	27	C	0.651	28	C	1	No
				PM	0.711	28	C	0.839	31	C	3	No

Notes:
* Average stopped delay per vehicle, in seconds.
** Indicates oversaturated conditions. Delay cannot be calculated.
Acronyms: TWSC = Two-Way Stop Control, AWSC = All Way Stop Control, A = Arterial intersection, C Collector intersection
SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019.

TABLE 4.17-16
APPROVAL YEAR (2019) INTERSECTION LEVEL OF SERVICE – CITY OF LOS ANGELES (CMA) METHODOLOGY

No.	Intersection	City	Peak Hour	Approval Year V/C	Approval Year LOS	Approval + Project V/C	Approval + Project LOS	V/C Ratio Change	Significant Impact?
58	26th St & San Vicente Blvd	SM/LA	AM	0.653	B	0.660	B	0.007	No
			PM	0.715	C	0.718	C	0.004	No
68	Berkeley St & Wilshire Blvd	SM/LA	AM	0.607	B	0.615	B	0.008	No
			PM	0.550	A	0.555	A	0.005	No
69	Centinela Ave & Wilshire Blvd	SM/LA	AM	0.497	A	0.500	A	0.003	No
			PM	0.550	A	0.559	A	0.009	No
70	Centinela Ave & Santa Monica Blvd	SM/LA	AM	0.713	C	0.765	C	0.051	Yes
			PM	0.683	B	0.743	C	0.059	Yes
71	Centinela Ave & Broadway	SM/LA	AM	0.473	A	0.499	A	0.025	No
			PM	0.647	B	0.672	B	0.025	No
72	Centinela Ave & Olympic Blvd (west)	SM/LA	AM	0.641	B	0.652	B	0.011	No
			PM	0.650	B	0.667	B	0.017	No
73	Centinela Ave & Olympic Blvd (east)	SM/LA	AM	0.569	A	0.581	A	0.012	No
			PM	0.473	A	0.486	A	0.013	No
74	Centinela Ave & I-10 WB Ramps	LA	AM	0.868	D	0.881	D	0.013	No
			PM	0.847	D	0.862	D	0.015	No
75	Bundy Dr & Texas Ave	LA	AM	0.453	A	0.459	A	0.005	No
			PM	0.597	A	0.604	B	0.007	No
76	Bundy Dr & Wilshire Blvd	LA	AM	0.747	C	0.765	C	0.017	No
			PM	0.642	B	0.647	B	0.005	No
77	Bundy Dr & Santa Monica Blvd	LA	AM	0.523	A	0.547	A	0.023	No
			PM	0.597	A	0.637	B	0.040	No
78	Bundy Dr & Ohio Ave	LA	AM	0.520	A	0.528	A	0.008	No
			PM	0.560	A	0.569	A	0.009	No
79	Bundy Dr & Olympic Blvd	LA	AM	0.811	D	0.820	D	0.009	No
			PM	0.808	D	0.819	D	0.011	No
80	Bundy Dr & Ocean Park Blvd	LA	AM	0.904	E	0.906	E	0.002	No
			PM	1.231	F	1.237	F	0.006	No
81	Bundy Dr & I-10 EB On-Ramp	LA	AM	0.613	B	0.625	B	0.011	No
			PM	0.580	A	0.605	B	0.025	No
82	Barrington Ave & Wilshire Blvd	LA	AM	0.837	D	0.868	D	0.031	Yes
			PM	0.651	B	0.687	B	0.036	No
83	Barrington Ave & Santa Monica Blvd	LA	AM	0.655	B	0.681	B	0.026	No
			PM	0.635	B	0.686	B	0.051	No

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019.

Interim Year (2031) Plus Project

As shown in **Table 4.17-17**, *Interim Year (2031) Intersection Level of Service – City of Santa Monica (HCM) Methodology*, of the 83 analyzed intersections, the following eight study intersections would be significantly impacted by the Project under the HCM methodology:

33. 20th Street & Pico Boulevard (LOS E during the PM peak hour)
42. 23rd Street & Arizona Avenue (LOS C becoming LOS D during the PM peak hour)
44. 23rd Street & Broadway (LOS E becoming LOS F during the PM peak hour)
50. Cloverfield Boulevard & Olympic Boulevard (LOS E during the PM peak hour)
53. Cloverfield Boulevard & I-10 Eastbound On-Ramp (LOS E during the PM peak hour)
79. Bundy Drive & Olympic Boulevard (LOS E during the AM and PM peak hour)
81. Bundy Drive & I-10 Eastbound On-Ramp (LOS E during the PM peak hour)
82. Barrington Avenue & Wilshire Boulevard (LOS F during the PM peak hour)

As shown in **Table 4.17-18**, Interim *Year (2031) Intersection Level of Service – City of Los Angeles (CMA) Methodology*, 17 intersections are located in or shared with the City of Los Angele. As indicated, two of these study intersections would be significantly impacted by the Project under the CMA methodology:

79. Bundy Drive & Olympic Boulevard (LOS E during the AM and PM peak hour)
82. Barrington Avenue & Wilshire Boulevard (LOS D in the PM peak hour)

Future Year (2042) Plus Project

As shown in **Table 4.17-19**, *Future Year (2042) Intersection Level of Service – City of Santa Monica (HCM) Methodology*, of the 83 analyzed intersections, the following 10 study intersections would be significantly impacted by the Project under the HCM methodology:

33. 20th Street & Pico Boulevard (LOS D becoming LOS E during the PM peak hour)
42. 23rd Street & Arizona Avenue (LOS C becoming LOS E in the PM peak hour)
44. 23rd Street & Broadway (LOS F during the PM peak hour)
50. Cloverfield Boulevard & Olympic Boulevard (LOS D becoming LOS E in PM peak hour)
53. Cloverfield Boulevard & I-10 Eastbound On-Ramp (LOS E during the PM peak hour)
74. Centinela Avenue & I-10 Westbound On-Off Ramps (LOS F during the AM peak hour)
79. Bundy Drive & Olympic Boulevard (LOS E during the AM and PM peak hours)
80. Bundy Drive & Ocean Park Boulevard (LOS F during the AM and PM peak hours)
81. Bundy Drive & I-10 Eastbound On-Ramp (LOS F during the AM peak hour)
82. Barrington Avenue & Wilshire Boulevard (LOS D becoming LOS E during the AM peak hour and LOS F during the PM peak hour)

TABLE 4.17-17
INTERIM YEAR (2031) INTERSECTION LEVEL OF SERVICE – CITY OF SANTA MONICA (HCM) METHODOLOGY

					2031 No Project			2031 With Project				
No.	Intersection	Class	Control Type	Peak Hour	V/C	Delay*	LOS	V/C	Delay*	LOS	V/C Or Delay Change	Significant Impact?
1	Ocean Avenue &	A	Signalized	AM	0.810	28	C	0.810	28	C	0	No
	California Avenue			PM	1.068	58	E	1.056	58	E	0	No
2	Lincoln Boulevard &	A	Signalized	AM	0.428	21	C	0.428	21	C	0	No
	Wilshire Boulevard			PM	0.529	24	C	0.530	24	C	0	No
3	Lincoln Boulevard &	A	Signalized	AM	0.316	15	B	0.316	15	B	0	No
	Arizona Avenue			PM	0.388	17	B	0.394	17	B	0	No
4	Lincoln Boulevard &	A	Signalized	AM	0.485	23	C	0.485	23	C	0	No
	Santa Monica Boulevard			PM	0.562	32	C	0.569	32	C	0	No
5	Lincoln Boulevard &	A	Signalized	AM	0.542	25	C	0.542	25	C	0	No
	Broadway			PM	0.652	35	D	0.653	35	D	0	No
6	Lincoln Boulevard &	A	Signalized	AM	0.699	23	C	0.699	23	C	0	No
	Colorado Avenue			PM	0.793	33	C	0.795	33	C	0	No
7	Lincoln Boulevard &	A	Signalized	AM	0.852	72	E	0.852	72	E	0	No
	Olympic Blvd/I-10 WB Off-Ramp			PM	0.946	71	E	0.949	71	E	0	No
8	Lincoln Boulevard &	A	Signalized	AM	0.711	27	C	0.711	27	C	0	No
	I-10 EB On-Ramp			PM	1.041	**	F	1.044	**	F	0.003	No
9	Lincoln Boulevard &	A	Signalized	AM	0.774	48	D	0.774	48	D	0	No
	Ocean Park Boulevard			PM	0.711	40	D	0.713	40	D	0	No
10	11th Street &	A	Signalized	AM	0.427	17	B	0.427	17	B	0	No
	Santa Monica Boulevard			PM	0.419	17	B	0.423	17	B	0	No
11	11th Street &	A	Signalized	AM	0.485	20	B	0.485	20	B	0	No
	Pico Boulevard			PM	0.471	19	B	0.474	20	B	1	No
12	14th Street &	C	Signalized	AM	0.516	16	B	0.516	16	B	0	No
	Montana Avenue			PM	0.478	15	B	0.482	15	B	0	No
13	14th Street &	A	Signalized	AM	0.484	16	B	0.484	16	B	0	No
	Wilshire Boulevard			PM	0.506	17	B	0.510	18	B	1	No
14	14th Street &	C	Signalized	AM	0.377	13	B	0.377	13	B	0	No
	Arizona Avenue			PM	0.575	18	B	0.583	18	B	0	No
15	14th Street &	A	Signalized	AM	0.406	17	B	0.406	17	B	0	No
	Santa Monica Boulevard			PM	0.455	16	B	0.459	16	B	0	No
16	14th Street &	C	Signalized	AM	0.482	16	B	0.482	16	B	0	No
	Broadway			PM	0.444	16	B	0.445	16	B	0	No
17	14th Street &	A	Signalized	AM	0.431	16	B	0.431	16	B	0	No
	Olympic Boulevard			PM	0.488	16	B	0.492	16	B	0	No
18	17th Street &	C	Signalized	AM	0.476	8	A	0.476	8	A	0	No
	Montana Avenue			PM	0.458	8	A	0.460	8	A	0	No
19	17th Street & Wilshire Boulevard	A	Signalized	AM	0.483	16	B	0.483	16	B	0	No
				PM	0.523	15	B	0.526	15	B	0	No
20	17th Street &	C	Signalized	AM	1.014	50	D	1.014	50	D	0	No
	Arizona Avenue			PM	0.625	22	C	0.671	23	C	1	No
21	17th Street &	A	Signalized	AM	0.478	17	B	0.478	17	B	0	No
	Santa Monica Boulevard			PM	0.497	17	B	0.503	17	B	0	No
22	17th Street &	C	Signalized	AM	0.495	16	B	0.495	16	B	0	No
	Broadway			PM	0.482	16	B	0.484	16	B	0	No
23	20th Street &	C	Signalized	AM	0.371	6	A	0.371	6	A	0	No
	Montana Avenue (west)			PM	0.408	6	A	0.418	6	A	0	No
24	20th Street &	C	Signalized	AM	0.436	7	A	0.436	7	A	0	No
	Montana Avenue (east)			PM	0.421	7	A	0.433	7	A	0	No

No.	Intersection	Class	Control Type	Peak Hour	2031 No Project V/C	2031 No Project Delay*	2031 No Project LOS	2031 With Project V/C	2031 With Project Delay*	2031 With Project LOS	V/C Or Delay Change	Significant Impact?
25	20th Street & Wilshire Boulevard	A	Signalized	AM	0.576	17	B	0.576	17	B	0	No
				PM	0.554	19	B	0.563	20	C	1	No
26	20th Street & Arizona Avenue	C	Signalized	AM	0.717	21	C	0.717	21	C	0	No
				PM	0.636	21	C	0.652	22	C	1	No
27	20th Street & Santa Monica Boulevard	A	Signalized	AM	0.548	35	C	0.548	35	C	0	No
				PM	0.555	27	C	0.596	29	C	2	No
28	20th Street & Broadway	C	Signalized	AM	0.544	17	B	0.544	17	B	0	No
				PM	0.499	18	B	0.526	18	B	0	No
29	20th Street & Colorado Avenue	A	Signalized	AM	0.617	18	B	0.617	18	B	0	No
				PM	0.514	17	B	0.528	17	B	0	No
30	20th Street & Olympic Boulevard	A	Signalized	AM	0.834	50	D	0.834	50	D	0	No
				PM	0.701	38	D	0.714	39	D	1	No
31	20th Street & I-10 EB Off-Ramp	A	Signalized	AM	0.530	28	C	0.530	28	C	0	No
				PM	0.422	17	B	0.432	17	B	0	No
32	20th Street & Delaware Avenue	C	Signalized	AM	0.367	9	A	0.367	9	A	0	No
				PM	0.539	12	B	0.544	12	B	0	No
33	20th Street & Pico Boulevard	A	Signalized	AM	0.607	28	C	0.607	28	C	0	No
				PM	0.658	59	E	0.673	67	E	8	Yes
34	20th Place & Santa Monica Boulevard	A	Signalized	AM				0.381	10	A		
				PM				0.451	14	B		
35	20th Place & Broadway	C	Two-way stop	AM				0.138	29	D		
				PM				0.190	35	E		
36	21st Street & Arizona Avenue	C	All-way stop	AM	0.423	10	B	0.423	10	B	0	No
				PM	0.804	19	C	0.874	23	C	4	No
37	21st Street & Broadway	C	Two-way stop	AM	0.760	53	F	0.008	9	A	-45	No
				PM	0.978	59	F	0.009	9	A	-50	No
38	22nd Street & Arizona Avenue	C	All-way stop	AM	0.462	11	B	0.462	11	B	0	No
				PM	0.680	14	B	0.740	16	C	2	No
39	22nd Street & Santa Monica Boulevard	A	Signalized	AM								
				PM								
40	22nd Street & Broadway	C	Signalized	AM								
				PM								
41	23rd Street & Wilshire Boulevard	A	Signalized	AM	0.542	13	B	0.542	13	B	0	No
				PM	0.532	12	B	0.559	13	B	1	No
42	23rd Street & Arizona Avenue	C	All-way stop	AM	0.659	19	C	0.659	19	C	0	No
				PM	0.781	21	C	0.948	35	D	14	Yes
43	23rd Street & Santa Monica Boulevard	A	Signalized	AM	0.589	15	B	0.589	15	B	0	No
				PM	0.481	8	A	0.527	9	A	1	No
44	23rd Street & Broadway	C	Two-way stop	AM	0.516	50	E	0.516	50	E	0	No
				PM	0.124	41	E	0.914	**	F	≥ 1	Yes
45	23rd Street & Pico Boulevard	A	Signalized	AM	0.516	23	C	0.516	23	C	0	No
				PM	0.542	19	B	0.546	19	B	0	No
46	23rd Street & Ocean Park Boulevard	A	Signalized	AM	0.770	45	D	0.770	45	D	0	No
				PM	0.654	25	C	0.667	25	C	0	No
47	Cloverfield Boulevard & Santa Monica Boulevard	A	Signalized	AM	0.609	21	C	0.609	21	C	0	No
				PM	0.600	18	B	0.674	20	C	2	No
48	Cloverfield Boulevard & Broadway	A	Signalized	AM PM	0.573	22	C B	0.573	22	C B	0	No
					0.461	17		0.489	18		1	No
49	Cloverfield Boulevard & Colorado Avenue	A	Signalized	AM PM	0.640	33	C D	0.640	33	C D	0	No
					0.609	41		0.624	41		0	No
50	Cloverfield Boulevard & Olympic Boulevard	A	Signalized	AM PM	0.595	37	D E	0.595	37	D E	0	No
					0.829	57		0.842	60		3	Yes

No.	Intersection	Class	Control Type	Peak Hour	2031 No Project V/C	2031 No Project Delay*	2031 No Project LOS	2031 With Project V/C	2031 With Project Delay*	2031 With Project LOS	V/C Or Delay Change	Significant Impact?
51	Cloverfield Boulevard & Michigan Avenue	A	Signalized	AM	0.573	26	C	0.573	26	C	0	No
				PM	0.870	40	D	0.885	43	D	3	No
52	Cloverfield Boulevard & I-10 WB Off-Ramp	A	Signalized	AM	0.477	33	C	0.477	33	C	0	No
				PM	0.913	36	D	0.928	40	D	4	No
53	Cloverfield Boulevard & I-10 EB On-Ramp	A	Signalized	AM	0.581	20	B	0.581	20	B	0	No
				PM	1.091	59	E	1.099	61	E	2	Yes
54	Cloverfield Boulevard & Virginia Avenue	A	Signalized	AM	0.391	11	B	0.391	11	B	0	No
				PM	0.485	10	A	0.494	10	A	0	No
55	Cloverfield Boulevard & Pico Boulevard	A	Signalized	AM	0.634	41	D	0.634	41	D	0	No
				PM	0.683	32	C	0.695	32	C	0	No
56	Cloverfield Boulevard & Ocean Park Boulevard	A	Signalized	AM	0.467	10	A	0.467	10	A	0	No
				PM	0.436	14	B	0.445	14	B	0	No
57	24th Street & Montana Avenue	C	Signalized	AM	0.360	11	B	0.360	11	B	0	No
				PM	0.356	5	A	0.357	5	A	0	No
58	26th Street & San Vicente Boulevard	A	Signalized	AM	0.621	45	D	0.621	45	D	0	No
				PM	0.621	40	D	0.622	40	D	0	No
59	26th Street & Montana Avenue	C	Signalized	AM	0.564	16	B	0.564	16	B	0	No
				PM	0.580	17	B	0.586	17	B	0	No
60	26th Street & Wilshire Boulevard	A	Signalized	AM	0.697	39	D	0.697	39	D	0	No
				PM	0.692	35	D	0.705	37	D	2	No
61	26th Street & Arizona Avenue	A	Signalized	AM	0.632	27	C	0.632	27	C	0	No
				PM	0.553	23	C	0.568	23	C	0	No
62	26th Street & Santa Monica Boulevard	A	Signalized	AM	0.661	34	C	0.661	34	C	0	No
				PM	0.639	35	D	0.665	36	D	1	No
63	26th Street & Broadway	A	Signalized	AM	0.650	19	B	0.650	19	B	0	No
				PM	0.678	22	C	0.680	20	B	-2	No
64	26th Street & Colorado Avenue	A	Signalized	AM	0.483	24	C	0.483	24	C	0	No
				PM	0.617	34	C	0.620	34	C	0	No
65	26th Street & Olympic Boulevard	A	Signalized	AM	0.691	39	D	0.691	39	D	0	No
				PM	0.736	44	D	0.736	44	D	0	No
66	Yale Street & Wilshire Boulevard	A	Signalized	AM	0.502	11	B	0.502	11	B	0	No
				PM	0.532	12	B	0.535	12	B	0	No
67	Yale Street & Santa Monica Boulevard	A	Signalized	AM	0.596	15	B	0.596	15	B	0	No
				PM	0.460	12	B	0.480	12	B	0	No
68	Berkeley Street & Wilshire Boulevard	A	Signalized	AM	0.629	13	B	0.629	13	B	0	No
				PM	0.567	14	B	0.574	14	B	0	No
69	Centinela Avenue & Wilshire Boulevard	A	Signalized	AM	0.503	8	A	0.503	8	A	0	No
				PM	0.650	12	B	0.658	12	B	0	No
70	Centinela Avenue & Santa Monica Boulevard	A	Signalized	AM	0.744	20	C	0.744	20	C	0	No
				PM	0.673	18	B	0.720	20	B	2	No
71	Centinela Avenue & Broadway	A	Signalized	AM	0.562	14	B	0.562	14	B	0	No
				PM	0.631	16	B	0.641	16	B	0	No
72	Centinela Avenue & Olympic Boulevard (west int)	A	Signalized	AM	0.638	14	B	0.638	14	B	0	No
				PM	0.654	16	B	0.654	16	B	0	No
73	Centinela Avenue & Olympic Boulevard	A	Signalized	AM	0.689	24	C	0.689	24	C	0	No
				PM	0.535	17	B	0.541	17	B	0	No
74	Centinela Avenue & I-10 WB On-Off Ramps	A	Signalized	AM	0.834	97	F	0.834	97	F	0	No
				PM	0.797	48	D	0.804	49	D	1	No
75	Bundy Drive & Texas Avenue	A	Signalized	AM	0.595	15	B	0.595	15	B	0	No
				PM	0.709	20	B	0.724	20	C	0	No
76	Bundy Drive &	A	Signalized	AM	0.743	44	D	0.743	44	D	0	No

No.	Intersection	Class	Control Type	Peak Hour	2031 No Project V/C	2031 No Project Delay*	2031 No Project LOS	2031 With Project V/C	2031 With Project Delay*	2031 With Project LOS	V/C Or Delay Change	Significant Impact?
	Wilshire Boulevard			PM	0.748	39	D	0.752	40	D	1	No
77	Bundy Drive &	A	Signalized	AM	0.521	21	C	0.521	21	C	0	No
	Santa Monica Boulevard			PM	0.679	25	C	0.722	26	C	1	No
78	Bundy Drive &	A	Signalized	AM	0.549	17	B	0.549	17	B	0	No
	Ohio Avenue			PM	0.484	16	B	0.491	16	B	0	No
79	Bundy Drive & Olympic Boulevard	A	Signalized	AM	0.834	69	E	0.834	69	E	0	No
				PM	0.787	61	E	0.796	63	E	2	Yes
80	Bundy Drive &	A	Signalized	AM	1.089	88	F	1.089	88	F	0	No
	Ocean Park Boulevard			PM	0.925	**	F	0.929	**	F	0.004	No
81	Bundy Drive &	A	Signalized	AM	1.133	** 56	F	1.133	** 62	F	0	No
	I-10 EB On-Ramp			PM	0.854		E	0.874		E	6	Yes
82	Barrington Avenue & Wilshire Boulevard	A	Signalized	AM	0.863	59	E	0.863	59	E	0	No
				PM	0.850	**	F	0.870	**	F	0.02	Yes
83	Barrington Avenue & Santa Monica Boulevard	A	Signalized	AM	0.653	29	C	0.653	29	C	0	No
				PM	0.625	27	C	0.666	28	C	1	No

Notes:
* Average stopped delay per vehicle, in seconds.
** Indicates oversaturated conditions. Delay cannot be calculated.
Acronyms: TWSC = Two-Way Stop Control, AWSC = All Way Stop Control, A = Arterial intersection, C = Collector intersection

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project,2019.

TABLE 4.17-18
INTERIM YEAR (2031) INTERSECTION LEVEL OF SERVICE – CITY OF LOS ANGELES (CMA) METHODOLOGY

No.	Intersection	City	Peak Hour	Interim Year V/C	Interim Year LOS	Interim + Project V/C	Interim + Project LOS	V/C Ratio Change	Significant Impact?
58	26th St & San Vicente Blvd	SM/LA	AM	0.631	B	0.635	B	0.004	No
			PM	0.696	B	0.698	B	0.001	No
68	Berkeley St & Wilshire Blvd	SM/LA	AM	0.583	A	0.589	A	0.005	No
			PM	0.557	A	0.560	A	0.003	No
69	Centinela Ave & Wilshire Blvd	SM/LA	AM	0.460	A	0.462	A	0.002	No
			PM	0.617	B	0.625	B	0.008	No
70	Centinela Ave & Santa Monica Blvd	SM/LA	AM	0.670	B	0.701	C	0.031	No
			PM	0.680	B	0.719	C	0.039	No
71	Centinela Ave & Broadway	SM/LA	AM	0.467	A	0.478	A	0.011	No
			PM	0.640	B	0.653	B	0.013	No
72	Centinela Ave & Olympic Blvd (west)	SM/LA	AM	0.632	B	0.639	B	0.007	No
			PM	0.692	B	0.704	C	0.012	No
73	Centinela Ave & Olympic Blvd (east)	SM/LA	AM	0.623	B	0.628	B	0.005	No
			PM	0.496	A	0.503	A	0.006	No
74	Centinela Ave & I-10 WB Ramps	LA	AM	0.889	D	0.895	D	0.006	No
			PM	0.889	D	0.899	D	0.009	No
75	Bundy Dr & Texas Ave	LA	AM	0.470	A	0.474	A	0.004	No
			PM	0.557	A	0.564	A	0.007	No
76	Bundy Dr & Wilshire Blvd	LA	AM	0.871	D	0.880	D	0.009	No
			PM	0.795	C	0.798	C	0.004	No
77	Bundy Dr & Santa Monica Blvd	LA	AM	0.560	A	0.582	A	0.022	No
			PM	0.670	B	0.695	B	0.025	No
78	Bundy Dr & Ohio Ave	LA	AM	0.600	A	0.605	B	0.005	No
			PM	0.570	A	0.577	A	0.007	No
79	Bundy Dr & Olympic Blvd	LA	AM	0.899	D	0.912	E	0.013	Yes
			PM	0.840	D	0.851	D	0.010	No
80	Bundy Dr & Ocean Park Blvd	LA	AM	0.973	E	0.974	E	0.001	No
			PM	1.224	F	1.228	F	0.004	No
81	Bundy Dr & I-10 EB On-Ramp	LA	AM	1.033	F	1.043	F	0.009	No
			PM	0.740	C	0.761	C	0.021	No
82	Barrington Ave & Wilshire Blvd	LA	AM	0.833	D	0.849	D	0.016	No
			PM	0.826	D	0.851	D	0.025	Yes
83	Barrington Ave & Santa Monica Blvd	LA	AM	0.675	B	0.703	C	0.027	No
			PM	0.589	A	0.618	B	0.029	No

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019.

TABLE 4.17-19
FUTURE YEAR (2042) INTERSECTION LEVEL OF SERVICE – CITY OF SANTA MONICA (HCM) METHODOLOGY

No.	Intersection	Class	Control Type	Peak Hour	Future No Project V/C	Future No Project Delay*	Future No Project LOS	Future With Project V/C	Future With Project Delay*	Future With Project LOS	V/C Or Delay Change	Significant Impact?
1	Ocean Avenue & California Avenue	A	Signalized	AM	0.903	26	C	0.902	26	C	0	No
				PM	1.268	64	E	1.238	63	E	-1	No
2	Lincoln Boulevard & Wilshire Boulevard	A	Signalized	AM	0.427	21	C	0.430	21	C	0	No
				PM	0.550	27	C	0.553	27	C	0	No
3	Lincoln Boulevard & Arizona Avenue	A	Signalized	AM	0.307	15	B	0.313	15	B	0	No
				PM	0.398	17	B	0.410	17	B	0	No
4	Lincoln Boulevard & Santa Monica Boulevard	A	Signalized	AM	0.483	23	C	0.489	23	C	0	No
				PM	0.554	30	C	0.559	30	C	0	No
5	Lincoln Boulevard & Broadway	A	Signalized	AM	0.548	25	C	0.549	25	C	0	No
				PM	0.711	42	D	0.713	42	D	0	No
6	Lincoln Boulevard & Colorado Avenue	A	Signalized	AM	0.700	24	C	0.701	24	C	0	No
				PM	0.773	32	C	0.775	32	C	0	No
7	Lincoln Boulevard & Olympic Blvd/I-10 WB Off-Ramp	A	Signalized	AM	0.766	57	E	0.767	57	E	0	No
				PM	0.911	61	E	0.913	61	E	0	No
8	Lincoln Boulevard & I-10 EB On-Ramp	A	Signalized	AM	0.704	26	C	0.705	27	C	1	No
				PM	1.086	**	F	1.088	**	F	0.002	No
9	Lincoln Boulevard & Ocean Park Boulevard	A	Signalized	AM	0.794	53	D	0.795	53	D	0	No
				PM	0.676	36	D	0.677	36	D	0	No
10	11th Street & Santa Monica Boulevard	A	Signalized	AM	0.430	17	B	0.434	17	B	0	No
				PM	0.446	17	B	0.453	17	B	0	No
11	11th Street & Pico Boulevard	A	Signalized	AM	0.485	20	B	0.493	20	B	0	No
				PM	0.474	19	B	0.481	20	B	1	No
12	14th Street & Montana Avenue	C	Signalized	AM	0.524	16	B	0.533	16	B	0	No
				PM	0.490	15	B	0.500	15	B	0	No
13	14th Street & Wilshire Boulevard	A	Signalized	AM	0.467	16	B	0.480	17	B	1	No
				PM	0.518	17	B	0.529	18	B	1	No
14	14th Street & Arizona Avenue	C	Signalized	AM	0.387	13	B	0.411	13	B	0	No
				PM	0.591	19	B	0.614	20	C	1	No
15	14th Street & Santa Monica Boulevard	A	Signalized	AM	0.432	17	B	0.436	17	B	0	No
				PM	0.462	17	B	0.465	17	B	0	No
16	14th Street & Broadway	C	Signalized	AM	0.498	17	B	0.503	17	B	0	No
				PM	0.444	16	B	0.447	16	B	0	No
17	14th Street & Olympic Boulevard	A	Signalized	AM	0.424	15	B	0.434	15	B	0	No
				PM	0.487	16	B	0.498	16	B	0	No
18	17th Street & Montana Avenue	C	Signalized	AM	0.491	8	A	0.490	8	A	0	No
				PM	0.469	8	A	0.469	8	A	0	No
19	17th Street & Wilshire Boulevard	A	Signalized	AM	0.515	17	B	0.515	17	B	0	No
				PM	0.537	15	B	0.538	15	B	0	No
20	17th Street & Arizona Avenue	C	Signalized	AM	0.939	41	D	0.919	37	D	-4	No
				PM	0.486	20	B	0.499	20	C	0	No
21	17th Street & Santa Monica Boulevard	A	Signalized	AM	0.478	17	B	0.489	17	B	0	No
				PM	0.492	16	B	0.505	17	B	1	No
22	17th Street & Broadway	C	Signalized	AM	0.488	16	B	0.498	16	B	0	No
				PM	0.486	16	B	0.496	17	B	1	No
23	20th Street & Montana Avenue (west)	C	Signalized	AM	0.370	6	A	0.383	6	A	0	No
				PM	0.408	6	A	0.423	6	A	0	No
24	20th Street & Montana Avenue (east)	C	Signalized	AM	0.436	7	A	0.448	7	A	0	No
				PM	0.421	7	A	0.439	7	A	0	No

No.	Intersection	Class	Control Type	Peak Hour	Future No Project V/C	Future No Project Delay*	Future No Project LOS	Future With Project V/C	Future With Project Delay*	Future With Project LOS	V/C Or Delay Change	Significant Impact?
25	20th Street & Wilshire Boulevard	A	Signalized	AM	0.590	18	B	0.600	18	B	0	No
				PM	0.578	20	B	0.587	20	C	0	No
26	20th Street & Arizona Avenue	C	Signalized	AM	0.692	20	B	0.723	21	C	1	No
				PM	0.673	22	C	0.717	24	C	2	No
27	20th Street & Santa Monica Boulevard	A	Signalized	AM	0.527	32	C	0.547	33	C	1	No
				PM	0.561	28	C	0.614	29	C	1	No
28	20th Street & Broadway	C	Signalized	AM	0.524	17	B	0.539	17	B	0	No
				PM	0.499	17	B	0.519	17	B	0	No
29	20th Street & Colorado Avenue	A	Signalized	AM	0.586	18	B	0.601	18	B	0	No
				PM	0.517	17	B	0.533	17	B	0	No
30	20th Street & Olympic Boulevard	A	Signalized	AM	0.819	56	E	0.819	48	D	-8	No
				PM	0.706	40	D	0.724	41	D	1	No
31	20th Street & I-10 EB Off-Ramp	A	Signalized	AM	0.529	28	C	0.545	31	C	3	No
				PM	0.410	19	B	0.424	19	B	0	No
32	20th Street & Delaware Avenue	C	Signalized	AM	0.367	9	A	0.372	9	A	0	No
				PM	0.531	12	B	0.537	12	B	0	No
33	20th Street & Pico Boulevard	A	Signalized	AM	0.605	27	C	0.610	28	C	1	No
				PM	0.646	48	D	0.670	60	E	12	Yes
34	20th Place & Santa Monica Boulevard	A	Signalized	AM				0.392	26	A		
				PM				0.464	63	B		
35	20th Place & Broadway	C	Two-way stop	AM				0.143	26	D		
				PM				0.195	63	E		
36	21st Street & Arizona Avenue	C	All-way stop	AM	0.409	10	B	0.442	11	B	1	No
				PM	0.821	20	C	0.892	25	C	5	No
37	21st Street & Broadway	C	Two-way stop	AM	0.872	66	F	0.007	8	A	-58	No
				PM	0.924	50	F	0.009	9	A	-41	No
38	22nd Street & Arizona Avenue	C	All-way stop	AM	0.426	11	B	0.484	11	B	0	No
				PM	0.678	14	B	0.740	16	C	2	No
39	22nd Street & Santa Monica Boulevard	A	Signalized	AM				0.515	26	B		
				PM				0.594	63	B		
40	22nd Street & Broadway	C	Two-way stop	AM				0.020	26	D		
				PM				0.032	63	D		
41	23rd Street & Wilshire Boulevard	A	Signalized	AM	0.531	12	B	0.548	13	B	1	No
				PM	0.540	12	B	0.575	13	B	1	No
42	23rd Street & Arizona Avenue	C	All-way stop	AM	0.594	16	C	0.682	21	C	5	No
				PM	0.780	21	C	1.002	43	E	22	Yes
43	23rd Street & Santa Monica Boulevard	A	Signalized	AM	0.543	14	B	0.652	18	B	4	No
				PM	0.511	9	A	0.579	11	B	2	No
44	23rd Street & Broadway	C	Two-way stop	AM	0.340	45	E	0.306	43	E	-2	No
				PM	0.417	64	F	0.449	66	F	0.032	Yes
45	23rd Street & Pico Boulevard	A	Signalized	AM	0.513	23	C	0.516	24	C	1	No
				PM	0.542	19	B	0.545	20	B	1	No
46	23rd Street & Ocean Park Boulevard	A	Signalized	AM	0.786	44	D	0.795	47	D	3	No
				PM	0.677	26	C	0.688	26	C	0	No
47	Cloverfield Boulevard & Santa Monica Boulevard	A	Signalized	AM	0.575	20	B	0.678	23	C	3	No
				PM	0.601	18	B	0.744	22	C	4	No
48	Cloverfield Boulevard & Broadway	A	Signalized	AM	0.542	26	C	0.574	27	C	1	No
				PM	0.442	17	B	0.505	18	B	1	No
49	Cloverfield Boulevard & Colorado Avenue	A	Signalized	AM	0.666	35	D	0.676	35	D	0	No
				PM	0.675	40	D	0.700	40	D	0	No
50	Cloverfield Boulevard & Olympic Boulevard	A	Signalized	AM	0.630	39	D	0.645	39	D	0	No
				PM	0.835	53	D	0.859	59	E	6	Yes

No.	Intersection	Class	Control Type	Peak Hour	Future No Project V/C	Future No Project Delay*	Future No Project LOS	Future With Project V/C	Future With Project Delay*	Future With Project LOS	V/C Or Delay Change	Significant Impact?
51	Cloverfield Boulevard & Michigan Avenue	A	Signalized	AM	0.568	25	C	0.572	25	C	0	No
				PM	0.896	44	D	0.920	50	D	6	No
52	Cloverfield Boulevard & I-10 WB Off-Ramp	A	Signalized	AM	0.476	32	C	0.510	36	D	4	No
				PM	0.928	45	D	0.953	55	D	10	No
53	Cloverfield Boulevard & I-10 EB On-Ramp	A	Signalized	AM	0.553	19	B	0.555	19	B	0	No
				PM	1.128	68	E	1.157	75	E	7	Yes
54	Cloverfield Boulevard & Virginia Avenue	A	Signalized	AM	0.396	11	B	0.401	11	B	0	No
				PM	0.465	9	A	0.474	9	A	0	No
55	Cloverfield Boulevard & Pico Boulevard	A	Signalized	AM	0.658	45	D	0.669	47	D	2	No
				PM	0.685	32	C	0.696	33	C	1	No
56	Cloverfield Boulevard & Ocean Park Boulevard	A	Signalized	AM	0.494	10	A	0.496	10	A	0	No
				PM	0.430	13	B	0.432	13	B	0	No
57	24th Street & Montana Avenue	C	Signalized	AM	0.375	11	B	0.380	11	B	0	No
				PM	0.361	5	A	0.364	5	A	0	No
58	26th Street & San Vicente Boulevard	A	Signalized	AM	0.627	45	D	0.635	45	D	0	No
				PM	0.622	40	D	0.628	40	D	0	No
59	26th Street & Montana Avenue	C	Signalized	AM	0.569	16	B	0.583	17	B	1	No
				PM	0.584	17	B	0.598	17	B	0	No
60	26th Street & Wilshire Boulevard	A	Signalized	AM	0.691	39	D	0.709	40	D	1	No
				PM	0.701	36	D	0.719	38	D	2	No
61	26th Street & Arizona Avenue	A	Signalized	AM	0.629	27	C	0.636	27	C	0	No
				PM	0.576	23	C	0.593	24	C	1	No
62	26th Street & Santa Monica Boulevard	A	Signalized	AM	0.642	34	C	0.680	35	C	1	No
				PM	0.651	36	D	0.687	37	D	1	No
63	26th Street & Broadway	A	Signalized	AM	0.650	19	B	0.650	19	B	0	No
				PM	0.671	21	C	0.671	19	B	-2	No
64	26th Street & Colorado Avenue	A	Signalized	AM	0.498	25	C	0.502	25	C	0	No
				PM	0.640	33	C	0.647	33	C	0	No
65	26th Street & Olympic Boulevard	A	Signalized	AM	0.659	35	D	0.664	36	D	1	No
				PM	0.719	42	D	0.723	43	D	1	No
66	Yale Street & Wilshire Boulevard	A	Signalized	AM	0.509	11	B	0.516	11	B	0	No
				PM	0.532	12	B	0.536	12	B	0	No
67	Yale Street & Santa Monica Boulevard	A	Signalized	AM	0.571	14	B	0.606	14	B	0	No
				PM	0.453	11	B	0.485	11	B	0	No
68	Berkeley Street & Wilshire Boulevard	A	Signalized	AM	0.625	14	B	0.632	14	B	0	No
				PM	0.578	14	B	0.586	14	B	0	No
69	Centinela Avenue & Wilshire Boulevard	A	Signalized	AM	0.504	8	A	0.511	8	A	0	No
				PM	0.656	12	B	0.665	13	B	1	No
70	Centinela Avenue & Santa Monica Boulevard	A	Signalized	AM	0.714	18	B	0.780	24	C	6	No
				PM	0.680	18	B	0.749	22	C	4	No
71	Centinela Avenue & Broadway	A	Signalized	AM	0.558	14	B	0.582	15	B	1	No
				PM	0.629	16	B	0.650	16	B	0	No
72	Centinela Avenue & Olympic Boulevard (west int)	A	Signalized	AM	0.648	15	B	0.648	15	B	0	No
				PM	0.690	17	B	0.690	17	B	0	No
73	Centinela Avenue & Olympic Boulevard	A	Signalized	AM	0.721	25	C	0.732	25	C	0	No
				PM	0.538	18	B	0.550	18	B	0	No
74	Centinela Avenue & I-10 WB On-Off Ramps	A	Signalized	AM	0.793	84	F	0.804	85	F	0.011	Yes
				PM	0.769	45	D	0.781	47	D	2	No
75	Bundy Drive & Texas Avenue	A	Signalized	AM	0.619	16	B	0.626	17	B	1	No
				PM	0.740	22	C	0.758	23	C	1	No
76	Bundy Drive & Wilshire Boulevard	A	Signalized	AM	0.746	44	D	0.753	47	D	3	No
				PM	0.758	41	D	0.762	43	D	2	No

No.	Intersection	Class	Control Type	Peak Hour	Future No Project V/C	Future No Project Delay*	Future No Project LOS	Future With Project V/C	Future With Project Delay*	Future With Project LOS	V/C Or Delay Change	Significant Impact?
77	Bundy Drive & Santa Monica Boulevard	A	Signalized	AM	0.501	20	B	0.522	20	C	0	No
				PM	0.674	24	C	0.711	25	C	1	No
78	Bundy Drive & Ohio Avenue	A	Signalized	AM	0.572	19	B	0.582	20	B	1	No
				PM	0.512	17	B	0.523	17	B	0	No
79	Bundy Drive & Olympic Boulevard	A	Signalized	AM	0.846	68	E	0.862	72	E	4	Yes
				PM	0.779	58	E	0.797	61	E	3	Yes
80	Bundy Drive & Ocean Park Boulevard	A	Signalized	AM	1.164	**	F	1.169	**	F	0.005	Yes
				PM	0.976	**	F	0.981	**	F	0.005	Yes
81	Bundy Drive & I-10 EB On-Ramp	A	Signalized	AM	1.113	**	F	1.128	** 55	F	0.015	Yes
				PM	0.820	47	D	0.848		D	8	No
82	Barrington Avenue & Wilshire Boulevard	A	Signalized	AM	0.836	55	D	0.853	58	E	3	Yes
				PM	0.861	**	F	0.881	**	F	0.02	Yes
83	Barrington Avenue & Santa Monica Boulevard	A	Signalized	AM	0.628	27	C	0.678	29	C	2	No
				PM	0.630	27	C	0.729	29	C	2	No

Notes:
* Average stopped delay per vehicle, in seconds.
** Indicates oversaturated conditions. Delay cannot be calculated.
Acronyms: TWSC = Two-Way Stop Control, AWSC = All Way Stop Control, A = Arterial intersection, C = Collector intersection
SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019.

As shown in **Table 4.17-20**, Future *Year (2042) Intersection Level of Service – City of Los Angeles (CMA) Methodology*, 17 intersections are located in or shared with the City of Los Angeles. As indicated, the following six study intersections would be significantly impacted by the Project under the CMA methodology:

70. Centinela Avenue & Santa Monica Boulevard (LOS B becoming LOS C during the AM peak hour and LOS B becoming LOS C during the PM peak hour)
77. Bundy Drive & Santa Monica Boulevard (LOS B becoming LOS C during the PM peak hour)
79. Bundy Drive & Olympic Boulevard (LOS E during the AM peak hour)
81. Bundy Drive & I-10 Eastbound On-Ramp (LOS F during the AM peak hour)
82. Barrington Avenue & Wilshire Boulevard (LOS D during the AM and PM peak hours)
83. Barrington Avenue & Santa Monica Boulevard (LOS B becoming LOS C during the AM peak hour)

Summary of Intersection LOS Impacts

As indicated in **Table 4.17-21**, *Summary of Project Intersection LOS Impacts*, the Project would result in significant level of service impacts at a total of 13 intersections during Approval Year (2019) Plus Project, Interim Year (2031) Plus Project, and/or Future Year (2042) Plus Project conditions.

TABLE 4.17-20
FUTURE YEAR (2042) INTERSECTION LEVEL OF SERVICE – CITY OF LOS ANGELES (CMA) METHODOLOGY

No.	Intersection	City	Peak Hour	Future Year V/C	Future Year LOS	Future + Project V/C	Future + Project LOS	V/C Ratio Change	Significant Impact?
58	26th St & San Vicente Blvd	SM/LA	AM	0.635	B	0.642	B	0.007	No
			PM	0.696	B	0.704	C	0.007	No
68	Berkeley St & Wilshire Blvd	SM/LA	AM	0.603	B	0.611	B	0.008	No
			PM	0.560	A	0.565	A	0.005	No
69	Centinela Ave & Wilshire Blvd	SM/LA	AM	0.483	A	0.487	A	0.003	No
			PM	0.623	B	0.633	B	0.009	No
70	Centinela Ave & Santa Monica Blvd	SM/LA	AM	0.667	B	0.718	C	0.051	Yes
			PM	0.683	B	0.743	C	0.059	Yes
71	Centinela Ave & Broadway	SM/LA	AM	0.473	A	0.499	A	0.025	No
			PM	0.640	B	0.665	B	0.025	No
72	Centinela Ave & Olympic Blvd (west)	SM/LA	AM	0.635	B	0.647	B	0.011	No
			PM	0.682	B	0.699	B	0.017	No
73	Centinela Ave & Olympic Blvd (east)	SM/LA	AM	0.635	B	0.643	B	0.008	No
			PM	0.501	A	0.514	A	0.013	No
74	Centinela Ave & I-10 WB Ramps	LA	AM	0.847	D	0.860	D	0.013	No
			PM	0.854	D	0.869	D	0.015	No
75	Bundy Dr & Texas Ave	LA	AM	0.490	A	0.495	A	0.005	No
			PM	0.563	A	0.574	A	0.011	No
76	Bundy Dr & Wilshire Blvd	LA	AM	0.871	D	0.888	D	0.017	No
			PM	0.809	D	0.814	D	0.005	No
77	Bundy Dr & Santa Monica Blvd	LA	AM	0.538	A	0.572	A	0.034	No
			PM	0.663	B	0.703	C	0.040	Yes
78	Bundy Dr & Ohio Ave	LA	AM	0.617	B	0.625	B	0.008	No
			PM	0.590	A	0.599	A	0.009	No
79	Bundy Dr & Olympic Blvd	LA	AM	0.928	E	0.948	E	0.020	Yes
			PM	0.825	D	0.835	D	0.009	No
80	Bundy Dr & Ocean Park Blvd	LA	AM	1.013	F	1.015	F	0.002	No
			PM	1.260	F	1.266	F	0.006	No
81	Bundy Dr & I-10 EB On-Ramp	LA	AM	1.023	F	1.038	F	0.015	Yes
			PM	0.707	C	0.735	C	0.028	No
82	Barrington Ave & Wilshire Blvd	LA	AM	0.812	D	0.843	D	0.031	Yes
			PM	0.833	D	0.870	D	0.036	Yes
83	Barrington Ave & Santa Monica Blvd	LA	AM	0.671	B	0.719	C	0.047	Yes
			PM	0.593	A	0.641	B	0.048	No

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019.

TABLE 4.17-21
SUMMARY OF PROJECT INTERSECTION LOS IMPACTS

No.	Intersection	Peak Hour	Approval Year (2019) Plus Project		Interim Year (2031) Plus Project		Future Year (2042) Plus Project	
			Santa Monica (HCM)	Los Angeles (CMA)	Santa Monica (HCM)	Los Angeles (CMA)	Santa Monica (HCM)	Los Angeles (CMA)
26	20th Street &	AM						
	Arizona Avenue	PM	X					
33	20th Street &	AM						
	Pico Boulevard	PM			X		X	
42	23rd Street &	AM						
	Arizona Avenue	PM	X		X		X	
44	23rd Street &	AM						
	Broadway	PM			X		X	
50	Cloverfield Boulevard &	AM						
	Olympic Boulevard	PM	X		X		X	
53	Cloverfield Boulevard &	AM						
	I-10 EB On-Ramp	PM			X		X	
70	Centinela Avenue &	AM		X				X
	Santa Monica Boulevard	PM		X				X
74	Centinela Avenue &	AM	X				X	
	I-10 WB On-Off Ramps	PM						
77	Bundy Drive &	AM						
	Santa Monica Boulevard	PM						X
79	Bundy Drive &	AM				X	X	X
	Olympic Boulevard	PM			X		X	
80	Bundy Drive &	AM					X	
	Ocean Park Boulevard	PM	X				X	
81	Bundy Drive &	AM					X	X
	I-10 EB On-Ramp	PM			X			
82	Barrington Avenue &	AM		X			X	X
	Wilshire Boulevard	PM			X	X	X	X
83	Barrington Avenue &	AM						X
	Santa Monica Boulevard	PM						
Total Impacted Intersections:			**5**	**2**	**8**	**2**	**10**	**6**

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019.

Street Segment Operations

Table 4.17-22, *Street Segment Impact Analysis*, presents a summary of Project street segment impacts according to the City of Santa Monica's impact criteria. As indicated therein, based on the City's stringent significance criterion (i.e., the addition of more than one single trip), the Project would create significant operations impacts at the following six study street segments:

1. Arizona Avenue west of 17th Street
2. Arizona Avenue west of 20th Street
9. 23rd Street north of Wilshire Boulevard
10. 23rd Street north of Arizona Avenue
11. 23rd Street north of Santa Monica Boulevard
14. 23rd Street south of Ocean Park Boulevard

TABLE 4.17-22
STREET SEGMENT IMPACT ANALYSIS

Segment	Analyzed Classification	Existing ADT	Existing Plus Project				
			Project ADT	ADT	% Change	Significance Threshold	Significant Impact?
Arizona Avenue							
west of 17th Street	Feeder	7,002	390	7,392	5.6%	1 trip	Yes
west of 20th Street	Feeder	6,954	430	7,384	6.2%	1 trip	Yes
east of 23rd Street	Feeder	5,997	290	6,287	4.8%	12.5%	No
east of 26th Street	Feeder	4,973	50	5,023	1.0%	12.5%	No
between 20th and 23rd Street	Feeder	6,137	720	6,857	11.7%	12.5%	No
21st Street							
north of Wilshire Boulevard	Local	1,579	10	1,589	0.6%	12.5%	No
north of Arizona Avenue	Local	1,596	10	1,606	0.6%	12.5%	No
north of Broadway	Local	1,191	-600	591	-50.4%	12.5%	No
22nd Street							
north of Wilshire Boulevard	Local	2,431	30	2,461	1.2%	12.5%	No
north of Arizona Avenue	Local	1,256	30	1,286	2.4%	12.5%	No
23rd Street							
north of Wilshire Boulevard	Local	5,240	70	5,310	1.3%	1 trip	Yes
north of Arizona Avenue	Local	5,839	970	6,809	16.6%	1 trip	Yes
north of Santa Monica Boulevard	Local	6,833	1,870	8,703	27.4%	1 trip	Yes
south of Pico Boulevard	Collector	8,470	80	8,550	0.9%	12.5%	No
south of Ocean Park Boulevard	Collector	15,260	310	15,570	2.0%	1 trip	Yes
Cloverfield Boulevard							
south of Pico Boulevard	Collector	8,486	230	8,716	2.7%	12.5%	No
Schader Drive segment west of Cloverfield Boulevard	Local	714	-510	204	-71.4%	25%	No

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019.

It is noted that, for the purposes of this analysis, the segments of Arizona Avenue west of 17th Street and west of 20th Street are classified as feeder streets, and the other street segments are classified as local streets. The segment of 23rd Street south of Ocean Park Boulevard is classified as a collector street. For feeder streets with a current ADT of greater than 6,750, local streets with a current ADT of greater than 2,250, and collector streets with a current ADT of greater than 13,500 a proposed project is considered to create a significant impact if there is a net increase in ADT of one trip or more. The magnitude of the existing vehicle trip level at each of these locations is such that the addition of even a single daily trip is considered significant.

CMP Facilities

CMP Transportation Analysis

Based on the Project trip generation estimates and a review of the Project trip assignments, the Project (upon full occupancy in 2042) would exceed 50 total trips CMP screening thresholds during both the AM and PM peak hours at the following three of the five CMP arterial intersection monitoring locations within the traffic study area:

47. Cloverfield Boulevard & Santa Monica Boulevard
60. 26th Street & Wilshire Boulevard
77. Bundy Drive & Santa Monica Boulevard

Project trips would not exceed 50 total trips in any period at the other monitoring intersections (e.g., Lincoln Boulevard & Santa Monica Boulevard, study intersection 4, and Lincoln Boulevard & Pico Boulevard, not a study intersection), as shown in the Project-only volumes in Appendix B2 of the TIA. According to CMP guidelines, an impact is triggered if a proposed project increases traffic demand by 2% of capacity, causing LOS F, or, if the facility is already at LOS F and the project increases traffic demand by 2% of capacity. As shown in Tables 4.17-15, -17 and -19, using these criteria the Project impacts on the CMP arterial system would be less than significant, and no further CMP arterial analysis of these intersections is required.

Regarding the CMP mainline freeway monitoring locations, based on the incremental Project trip generation estimates and Project trip assignment, the Project would not add enough new vehicle trips to exceed the freeway analysis criteria at the CMP mainline freeway monitoring locations within the traffic study area (e.g., I-10 at Lincoln Boulevard, I-10 east of Overland Avenue, and I-405 north of Venice Boulevard). Because incremental Project-related vehicle trips in any direction during either peak hour is projected to be below the minimum criterion of 150 one-way vph at each of these monitoring locations, Project impacts on the CMP regional freeway system would be less than significant, the Project would not conflict with the CMP, and no further CMP freeway analysis is required.

CMP Transit Analysis

As indicated in Tables 4.17-11 and 4.17-12, the Project would generate a net increase of approximately 641 trips in the AM peak hour and 754 trips in the PM peak hour. Based on the CMP transit analysis methodology discussed previously (i.e., converting the vehicle trips to person trips by multiplying by a 1.4 AVR and assuming 3.5 percent transit use), it is expected that the Project would generate approximately 31 transit person trips in the AM peak hour and approximately 37 transit person trips in the PM peak hour. Based on the number of bus lines (local and express) and Expo Line trains and headways during each peak hour, there are approximately 7,040 transit seats available during the AM peak hour and 7,080 seats during the PM peak hour. The Project would generate transit trips of less than 1 percent of capacity during either peak hour. Thus, Project impacts on the regional transit system would be less than significant.

Hazards Due to Design Features

Impact TR-3: *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Impact Statement TR-3: The Project would not substantially increase hazards due to a geometric design feature or incompatible uses. Therefore, impacts related to hazards due to design features would be less than significant.

The Project would not include any hazardous design feature such as sharp curves or dangerous intersections either on- or off-site (e.g., all proposed intersections would be at right-angles and

signal or stop controlled), and the City's Mobility Division would review all proposed street improvements for safety and compliance with City Code requirements prior to the issuance of development review permits for each phase of development. The construction of the pedestrian overcrossing would also be reviewed by the City's Traffic Engineering Division and the City's Fire Department to ensure that no hazardous conditions would be created to normal traffic operations or emergency access. Furthermore, the Project would include the development of medical and residential uses rather than the types of uses (e.g., industrial, landfill, agriculture, etc.) that could potentially generate substantial truck or farm equipment traffic that is hazardous or incompatible with existing traffic. Therefore, the Project would result in less than significant impacts with regard to hazards due to geometric design features.

Emergency Access

Impact TR-4: *Would the project result in inadequate emergency access?*

Impact Statement TR-4: Adequate emergency access is currently available to the Project Site and would be maintained during Project construction and operation. Therefore, the impacts of the Project on emergency access would be less than significant.

As discussed in Sections 4.9, *Hazards and Hazardous Materials*, 4.15, *Police Protection*, and 4.16, *Fire Protection*, of this EIR, emergency access to the Project Site is currently available directly from several large arterials, including Arizona Avenue, Santa Monica Boulevard, Broadway, and 20th Street. Also: (1) the Project does not propose the closure or the major modification of these streets; and (2) the proposed site plan and associated street improvements would be reviewed and approved by multiple City Departments to ensure compliance with City code requirements and the provision of adequate emergency access. Furthermore, the SMFD provided preliminary review of the Phase II Master Plan site plan to ensure adequate emergency access. SMFD comments/input have been incorporated into the site plan, such as SMFD approved access control mechanisms on South East Campus Driveway, South West Campus driving, adequate turning radii on all new street corners, and adequate response distances to buildings for SMFD personnel. The Project proposes medical uses and would be located immediately adjacent to Saint John's Hospital such that immediate emergency medical service would always be available.

Saint John's continues to operate its Emergency Department in accordance with DA Section 2.8.3. Saint John's has signage strategically located around its campus directing public to the Emergency Department. This signage was approved by the City in 2009 (ARB09-359). Saint John's continues to advise ambulance companies in writing that (a) unless use of another route is compelled by medical emergency, ambulances shall access the Emergency Department via 20th Street and shall avoid using 21st Street, 22nd Street and 23rd Street or using Arizona Avenue east of the Emergency Department access and (b) unless the use of a siren is necessary to ensure the safe transport of patients to the Emergency Department, ambulances shall turn off sirens on Arizona Avenue between 20th Street and 23rd Street. Saint John's provides personnel at the entrance to the emergency department at all time to (i) monitor and direct the activity at the Emergency Department and (ii) monitor the parking area for the Emergency Department to ensure that private vehicles transporting patients to the Emergency Department do not park in the surrounding residential neighborhood. Saint John's has valet attendants available to move private vehicles which are used

to transport patients to the emergency department to other parking facilities promptly after dropping off their patients. Saint John's personnel also assist with ensuring (a) ambulances deliver patients to the emergency department, restock their ambulances with supplies and then leave the Emergency Department drop-off area and (b) ambulances are not permanently based on the Emergency Department access area.

Lastly, a Construction Traffic Management Plan (PDF-TR-1) would be implemented to, in part, ensure the continued provision of emergency access during the construction period. Therefore, the Project would not result in inadequate emergency access, and impacts would be less than significant.

4.17.5. Cumulative Impacts

Tables 3-1, *Cumulative Projects List*, in Chapter 3, General Description of Environmental Setting, of this EIR list the 131 cumulative projects (a.k.a., "related projects") through the future (2042) condition within the traffic study area. Table 3-1, *Cumulative Projects Map*, in Chapter 3 identifies the locations of these cumulative projects. These projects, which are pending, approved but not yet constructed, under construction, or final (built and in operation), would contribute with the Project to potential cumulative transportation impacts on the City's transportation facilities. As indicated in the cumulative projects maps, two cumulative projects are located within one-half block of the Project Site, including Project Nos. 34 (approved residential) and 35 (approved residential), while several additional cumulative projects are located within two blocks of the Project Site including Cumulative Project Nos. 18 (residential under construction), 27 (mixed-use artist studio and office under construction), 81 (medical office pending) and 112 (pending wellness center).

4.17.5.1 Consistency with Circulation Plans/Programs/Ordinances/ Policies

The Project would include mixed-use medical, commercial and residential development proximate to multiple transit options, would include pedestrian and bicycle improvements, would include the implementation of a TDM program (PDF-TR-2) and payment of the required Transportation Impact Fees, and would reduce VMT per capita, all of which would encourage the use of alternative transportation consistent with the alternative transportation policies of the LUCE and other applicable plans. The cumulative projects would similarly be required to support alternative transportation (such as, for example, by implementing TDM plans, paying Transportation Impact Fees, and incorporating bicycle facilities, as required by the SMMC). Furthermore, the Project would be fully consistent with applicable alternative transportation plans and policies as evaluated previously, and thus would not contribute considerably to any potential cumulative inconsistencies. Therefore, cumulative impacts with respect to consistency with alternative transportation plans and policies would be less than significant.

4.17.5.2 Conflict or Be Inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)

Vehicle Miles Travelled

VMT is generally project specific and not additive between projects. If anything, developing a diverse mix of uses in an urbanized and dense area like the City of Santa Monica tends to reduce VMT because it places more housing in proximity to goods and services, and visa-versa, requiring less motor vehicle use and shorter motor vehicle trips. Furthermore, like the Project, a large number of the cumulative projects would increase urban density within close proximity of mass transit stations, and would implement TDM programs, that would result in lower VMT than the Citywide VMT rate. Therefore, cumulative VMT impacts would be less than significant.

Intersection and Street Segment Operations

The level of service analysis in this section is based on the City's TDFM, which takes into account the trip generation associated with future growth in the City through at least 2042, including but not limited to the trip generation associated with the cumulative projects. As indicated under Impact Statement TR-2 above, the Project would result in less than significant level of service impacts at the majority of the study intersections and street segments analyzed. However, even with implementation of the proposed TDM program (PDF-TR-2), the Project would exceed applicable level of service thresholds at 14 intersections and six street segments, with these impacts being significant unavoidable.[3]

CMP Facilities

As indicated previously, the Project would result in less than significant impacts to the operations of the CMP arterial intersections and mainline freeway monitoring locations analyzed. Therefore, the Project would not make a cumulatively considerable contribution to significant cumulative impacts to CMP facilities.

As indicated previously, the Project would generate approximately 31 transit person trips in the AM peak hour and approximately 37 transit person trips in the PM peak hour, which, because these person trips would represent less than 1 percent of the capacity of the bus lines and Expo Line trains serving the Project vicinity (e.g., approximately 7,040 transit seats during the AM peak hour and 7,080 seats during the PM peak hour), would result in a less than significant impact on the regional transit system. The cumulative projects would similarly generate an incremental increase in demand for service from the local bus lines and Expo Line trains. While it is unknown exactly how many person trips would be generated by cumulative development, Metro and the other mass transit operators participate in facility planning to ensure that adequate buses and trains are available to meet demand. Furthermore, additional buses and trains are funded, in part, by user fees which would provide much of these funding for required additional capacity. Therefore, the Project would not result in a cumulatively considerably contribution to inconsistencies with the CMP, and as such impacts would be less than significant.

4.17.5.3 Hazards Due to Design Features and Emergency Access

Hazards due to design features and emergency access are generally project and project site specific, and associated impacts are generally not additive between projects. Furthermore, like the proposed

[3] If appropriate approvals are granted by the City of Los Angeles (and by Caltrans in the case of Intersection 81) in conjunction with Mitigation Measures TR-1 through TR-4 proposed below, impacts at Intersections 70, 77, and 81 would be mitigated to less than significant levels (e.g., 10 rather than 14 intersections would be significantly unavoidably impacted by the Project).

Project, each of the cumulative projects would be subject to site plan review, implement construction traffic management plans, and meet City street design and access requirements, all of which would avoid hazards due to design features and inadequate emergency access. Therefore, cumulative effects related to hazards due to design features and emergency access would be less than significant.

4.17.6 Mitigation Measures

An investigation was conducted for potential mitigation measures to reduce or eliminate the significant intersection and street segment impacts identified above. The emphasis was to identify physical improvements that could be implemented within the existing street ROWs. This is because: (1) most of the streets in Santa Monica are already built to their maximum potential width; (2) widening the streets to provide additional capacity for vehicles could have negative secondary impacts such as loss of parking, conflicts with bicycle or pedestrian modes, and the need to remove existing adjacent development; and (3) widening the streets would conflict with the LUCE objectives and City policies promoting alternative modes of transportation.

4.17.6.1 Intersections

Four of the 14 significantly impacted intersections would be significantly impacted by the Project in both the Approval Year (2019) and the Future Year (2042), while eight would be significantly impacted by the Project in both the Interim Year (2031) and the Future Year (2042). As discussed in detail in the TIA (Appendix L of this EIR), physical improvements were considered to reduce the severity of the Project's impacts. However, at 10 of these intersections, the proposed improvements could create substantial secondary impacts to pedestrian mobility and transit operations, and would be inconsistent with adopted City policies within the LUCE, Bike Action Plan, and the Pedestrian Action Plan. See the TIA for further discussion. As such, the potential improvements at the following intersections are considered to be infeasible.

26. 20th Street & Arizona Avenue
33. 20th Street & Pico Boulevard
42. 23rd Street & Arizona Avenue
44. 23rd Street & Broadway
50. Cloverfield Boulevard & Olympic Boulevard
53. Cloverfield Boulevard & I-10 Eastbound On-Ramp
74. Centinela Avenue & I-10 Westbound On-Off Ramps
80. Bundy Drive & Ocean Park Boulevard
82. Barrington Avenue & Wilshire Boulevard
83. Barrington Avenue & Santa Monica Boulevard

At the balance of the intersections to be significantly impacted by the Project (e.g., Intersections 70, 77, 79 and 81), feasible mitigation is available to reduce these impacts as discussed further below.

Intersection 70 (Centinela Avenue & Santa Monica Boulevard)

This intersection is on the border of Santa Monica and Los Angeles. It is not significantly impacted according to the City of Santa Monica's methodology and criteria for determining significant impacts. However, it is significantly impacted upon Master Plan buildout during the AM and PM peak hours under Approval Year and Future Year conditions, according to the City of Los Angeles' methodology and criteria for determining significant impacts. The existing northbound and southbound approaches are each currently served by one shared left-turn/through/right-turn lane. To mitigate the significant impact, a potential improvement could involve reconfiguring the existing northbound and southbound approaches to one left-turn lane and one shared through/right-turn lane at each approach. This would likely not require right-of-way acquisition but would require the removal of three or four heavily-used on-street parking spaces at both the northbound and southbound approaches, including a loading zone on the northbound approach, the impact of which would be less than significant owing to the limited number of parking spaces to be affected. This loading zone and parking on the northbound approach are located within the City of Los Angeles, and as such, the mitigation would require the City of Los Angeles' approval. The applicant would be required to work with the City of Los Angeles to implement this mitigation measure. In the event that the City of Los Angeles does not grant approval of the measure, this impact would be significant and unavoidable.

MM-TR-1: The Project Applicant shall reconfigure the existing northbound and southbound approaches of Intersection 70 (Centinela Avenue & Santa Monica Boulevard) to provide one left-turn lane and one shared through/right-turn lane at each approach. The Project Applicant shall seek approval from the City of Los Angeles to implement this improvement.

Intersection 77 (Bundy Drive & Santa Monica Boulevard)

This intersection, located in the City of Los Angeles, is significantly impacted upon Master Plan buildout during the PM peak hour under Future Year conditions. To mitigate the significant impact, a potential improvement could involve reconfiguring the existing eastbound shared through/right-turn lane to one through lane and one right-turn lane. This would require relocating the eastbound Big Blue Bus bus stop from the near side of the intersection to consolidate it with the existing Metro bus stop on the far side of the intersection. This mitigation would require coordination and approval from Big Blue Bus, Metro, and the City of Los Angeles. The applicant would be required to work with the aforementioned parties to implement this mitigation measure. In the event that the City of Los Angeles does not grant approval, this impact would be significant and unavoidable.

MM-TR-2: If agreed to by the Big Blue Bus and Metro, the eastbound Big Blue Bus bus stop from the near side of the intersection shall be consolidated with the existing Metro bus stop on the far side of the intersection. The Project Applicant shall reconfigure the eastbound approach of Intersection 77 (Bundy Drive & Santa Monica Boulevard) to provide one through lane and one right-turn lane. The Project Applicant shall seek approval from the City of Los Angeles to implement this improvement.

Intersection 79 (Bundy Drive & Olympic Boulevard)

This intersection, located in the City of Los Angeles, is near saturated or oversaturated (LOS D or E) during the AM and/or PM peak hours under both Interim Year (2031 and Future Year (2042)

conditions. As shown in Table 4.17-9, Intersection 79 was found to be significantly impacted with the addition of Project vehicle trips in the four scenarios listed below:

- Interim Year PM peak hour (HCM methodology)
- Interim Year AM peak hour (CMA methodology)
- Future Year AM peak hour (HCM and CMA methodologies)
- Future Year PM peak hour (HCM methodology)

A potential improvement to mitigate some of the above scenarios to a less than significant impact would involve restriping the northbound and southbound approaches to allow dual left-turn lanes. This improvement was identified as a mitigation measure in the Final EIR for the Martin Expo Town Center, which is currently in the process of obtaining permits for the improvement. Based on an inspection of the intersection during the week of April 22, the improvements to the southbound approach have been made, and Martin Expo Town Center is currently in the process of obtaining permits for the improvements to the northbound approach. If northbound restriping were completed and in place for all future scenarios, a significant Project impact would occur only in the Interim Year PM peak hour (HCM methodology). If the northbound restriping was to be treated as a mitigation measure for this Project, a significant impact would remain in the Cumulative Year PM peak hour (HCM methodology). Thus, whether the restriping is treated as a future baseline transportation improvement or as a Project mitigation, the impact would be reduced but a significant and unavoidable impact would still occur. If the Martin Expo Town Center project does not undertake the northbound approach restriping for any reason, the applicant would be required to undertake this restriping. This intersection is in the City of Los Angeles and would require the City's approval. This impact, however, would not be fully mitigated under all scenarios.

MM-TR-3: If the Martin Expo Town Center Project does not restripe the northbound approach at Intersection 79 (Bund Drive & Olympic Boulevard) to provide dual left-turn lanes, this restriping shall be undertaken by the Project Applicant. The Project Applicant shall seek approval from the City of Los Angeles to implement this improvement.

Intersection 81 (Bundy Drive & I-10 Eastbound On-Ramp)

This intersection, located in the City of Los Angeles, is oversaturated (LOS E or F) during both the AM and PM peak hours under both Interim Year (2031) and Future Year (2042) conditions. The heavy southbound left-turn and northbound through traffic contributes to the overall delay at this intersection. To mitigate the significant impact, a potential improvement could involve restriping the southbound approach to add a second left-turn lane. This would require removing on-street parking from the southbound approach on Bundy Drive, converting the HOV lane on the on-ramp to a mixed-flow lane, and approval from both Caltrans and the City of Los Angeles. The applicant would be required to work with Caltrans and City of Los Angeles to implement this mitigation measure. In the event that Caltrans or City of Los Angeles do not grant approval, this impact would be significant and unavoidable.

MM-TR-4: The Project Applicant shall restripe the southbound approach at Intersection 81 (Bundy Drive & I-10 Eastbound On-Ramp) to add a second left-turn lane.

This would entail converting the HOV lane on that ramp to a mixed-flow lane. The Project Applicant shall seek approval from Caltrans and the City of Los Angeles to implement this improvement.

4.17.6.2 Street Segments

The street segments significantly impacted by the Project are listed below:

1. Arizona Avenue west of 17th Street
2. Arizona Avenue west of 20th Street
9. 23rd Street north of Wilshire Boulevard
10. 23rd Street north of Arizona Avenue
11. 23rd Street north of Santa Monica Boulevard
14. 23rd Street south of Ocean Park Boulevard

The Project's significant impacts to the operation of the above-listed street segments are based on the potential for the Project to add more than one daily trip to each of these street segments, considered significant under the City of Santa Monica's impact criteria. Full closure of the affected street segments would not be acceptable, since they each serve adjacent land uses and carry substantial vehicle volumes that would then need to shift to other nearby streets. These impacts are not the result of capacity constraints but the classification of the street segments in the City of Santa Monica LUCE. Consequently, without re-classifying the impacted streets and therefore changing the impact criteria, no mitigation measures would fully eliminate the potential for even a single Project trip to be added to any of these street segments. Furthermore, the addition of additional lanes to the street segments is infeasible as the existing street ROWs are abutted by existing development. Therefore, no feasible mitigation is available to mitigate the Project's significant impacts at the above-listed street segments.

4.17.7 Level of Significance After Mitigation

Impacts regarding the following topics were concluded to be less than significant prior to the implementation of mitigation measures: regional transportation system; construction impacts; hazards due to design features; emergency access; and consistency with alternative transportation plans and policies. Therefore, no mitigation measures are required for these topics.

Intersection and street segment operations were concluded to be significant and unavoidable at the following study intersections and roadway segments, as discussed in the subsection above, as feasible mitigation (e.g., road widening, additional turn/travel lanes, etc.) is not available to reduce the impacts to less than significant levels.

4.17.7.1 Intersections Significantly and Unavoidably Impacted*

26. 20th Street & Arizona Avenue[4]
33. 20th Street & Pico Boulevard

[4] Significant impacts to Intersection 26 only occur during the approval year (2019 conditions). Thus, impacts at this intersection are presented for informational purposes only.

42. 23rd Street & Arizona Avenue
44. 23rd Street & Broadway
50. Cloverfield Boulevard & Olympic Boulevard
53. Cloverfield Boulevard & I-10 Eastbound On-Ramp
70. Centinela Avenue & Santa Monica Boulevard**
74. Centinela Avenue & I-10 Westbound On-Off Ramps
77. Bundy Drive & Santa Monica Boulevard**
79. Bundy Drive & Olympic Boulevard[5]
80. Bundy Drive & Ocean Park Boulevard
81. Bundy Drive & I-10 Eastbound On-Ramp**
82. Barrington Avenue & Wilshire Boulevard
83. Barrington Avenue & Santa Monica Boulevard

* These are Project and cumulative impacts.

** If appropriate approvals are granted by the City of Los Angeles (and by Caltrans in the case of Intersection 81) in conjunction with the mitigation measures identified above, impacts at Intersections 70, 77, and 81 would be mitigated to less than significant levels.

4.17.7.2 Street Segments Significantly and Unavoidably Impacted*

1. Arizona Avenue west of 17th Street
2. Arizona Avenue west of 20th Street
9. 23rd Street north of Wilshire Boulevard
10. 23rd Street north of Arizona Avenue
11. 23rd Street north of Santa Monica Boulevard
14. 23rd Street south of Ocean Park Boulevard

* These are both Project and cumulative impacts.

[5] The mitigation for Intersection 79 would reduce the Project's significant operational level of service impact at this intersection, but not to less than significant levels.

4.18 Tribal Cultural Resources

4.18.1 Introduction

This section provides an assessment of potential impacts related to tribal cultural resources that could result from implementation of the Project.

"Tribal cultural resources" are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register) or included in a local register of historical resources, or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. A cultural landscape that meets these criteria is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be tribal cultural resources if they meet these criteria.

4.18.2 Environmental Setting

4.18.2.1 Urban Setting

The Project Site is located within the northern portion of the City of Santa Monica (City). More specifically, the Project is located in the City's Healthcare Mixed-Use District, which includes the City's two hospitals (PSJHC and UCLA Medical Center), as well as medical office buildings. Surrounding land uses include hospital, commercial, and residential buildings of one to twelve stories in height.

4.18.2.2 Ethnographic Setting

The Project Site is located in the heart of Gabrielino[1] tribal territory which, at the start of the Spanish Period, included the Los Angeles Basin and adjacent areas, and San Clemente, Santa Catalina, and San Nicolas islands. Their mainland territory extended from the San Fernando Valley and the San Gabriel Mountains in the north to Aliso Creek and the Santa Ana Mountains in the south, and from Mount Rubidoux in the east to Topanga Canyon in the west. This territory included mountain, foothill, prairie, coastal zones, and the islands, which offered a variety of resources to Gabrielino foragers.

The Gabrielino relied on gathered wild plants and trapped or hunted animals[2] for food. Acorns and piñon nuts were food staples found only in the mountains and foothills. On the islands and coast, marine resources, especially shellfish, fish, and sea mammals, greatly supplemented terrestrial resources. Plants also provided building material and raw material for craft manufacturing such as

1 The Gabrielino (alternatively spelled Gabrieleño) are so called for their aggregation at the Mission San Gabriel Arcángel during the early Spanish Period. Currently, many Gabrielinos prefer the term Gabrielino-Tongva, or simply Tongva, or Kizh.

2 Plants were not domesticated and domesticated animals were limited to dogs. Archaeological data collected to date does not suggest that dogs were used for food.

basket making. Animal bone, skin, fur, and feathers were also used as raw material for craft manufacturing. Whale bones were sometimes used in building windbreaks and houses. Certain types of stone were quarried and asphaltum[3] was gathered for tool and container manufacturing, and for water-proofing boats. Santa Catalina Island provided abundant steatite[4] which was valued as a raw material for bowls and an array of other items, notably body ornaments.

The Gabrielino interaction sphere was considerably larger than their tribal territory *per se (*Bean and Smith 1978*)*:

> *With the possible exception of the Chumash [their westward neighbors], the Gabrielino were the wealthiest, most populous, and most powerful ethnic nationality in aboriginal southern California, their influence spreading as far north as the San Joaquin Valley Yokuts, as far east as the Colorado River, and south into Baja California.*

The Gabrielino spoke several dialects of a Cupan language in the Takic family, and neighboring tribes to the north, east, and south also spoke languages in the Takic family (Shipley 1978).

Spain established two Franciscan missions in Gabrielino tribal territory: Mission San Gabriel Arcángel, founded in 1771 in the north-central Los Angeles Basin, and Mission San Fernando Rey de España, founded 1797 in the north-central San Fernando Valley. Prior to aggregation at the missions, the Gabrielino settlement pattern included primary villages and secondary camps; both villages and camps were situated alongside fresh waterways or springs.

CA-LAN-382

CA-LAN-382 is a prehistoric site located approximately 2 miles from the Project Site. The site is described as the remains of a Native American village containing midden soils, various shell fragments, burned animal bones, numerous projectile points, andesite flakes, flaked scrapers, Monterey chert flakes, a chalcedony flake, pottery, one adult post-cranial skeleton and two Catalina steatite cups (Singer 1980).

There is also a natural springs located within the boundaries of CA-LAN-382 which is known by multiple names: Serra Springs after Father Junipero Serra, who reportedly said mass on the site in 1770 (Arbuckle, 1980), Tongva Sacred Springs after the Gabrielino Tongva peoples who resided at the site, and the name that the Gabrieleno Tongva people gave to both springs and the village site, *Kuruvungna Springs*, meaning "a place where we are in the sun" (Fisher, 1998). The springs are a designated California State Historical Landmark (No. 522). According to information about the springs on the City of Los Angeles website, in the 1800s the spring served as the water supply for the City.

[3] Asphaltum is a tar-like substance that washes ashore from natural, undersea oil seepages.
[4] A soft rock consisting largely of talc and also known as steatite.

4.18.2.3 Native American Heritage Commission Sacred Lands File

The California Native American Heritage Commission (NAHC) maintains a confidential Sacred Lands File (SLF) that contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on May 18, 2017, to request a search of the SLF. The NAHC responded to the request in a letter dated May 19, 2017, and indicated that the SLF was completed with negative results. The NAHC letter is provided as an appendix to the cultural resources technical report prepared for the Project (Candace et al., 2018) that is included in Appendix C of the EIR.

4.18.2.4 Tribal Cultural Resources Consultation

In accordance with Assembly Bill 52 (AB 52), on April 6, 2018, the City submitted a request to the NAHC for a CEQA Tribal Consultation List as may be relevant to the Project. The NAHC responded on April 17, 2018 with a consultation list of tribes with traditional lands or cultural places located within the boundaries of Los Angeles County.

The City submitted request to consult letters to the identified Native American individuals and organizations on the CEQA Tribal Consultation List on August 27, 2018. Recipients were requested to respond within 30 days of receipt of the letter if they wished to engage in government-to-government consultation per AB 52. On September 5, 2018, the City received a letter via email from Mr. Andrew Salas, Chairperson, of the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) as part of the AB 52 consultations. In the letter, the Kizh Nation indicated that the Project Site "is located within a sensitive area" and requested formal AB 52 consultation with the City for the Project.

On October 10, 2018, the City responded requesting further information and/or documentation that demonstrates specifically that the Project Site is located in a sensitive area for tribal cultural resources. The City also asks the Kizh Nation's availability for tribal consultation, as requested by the Kizh Nation. The Kizh Nation responded on October 12, 2018 suggesting a specific date and time. This date and time could not be accommodated by the City as indicated in a follow-up email on October 12, 2018. No response from the Kizh Nation was received. Another email was sent on October 24, 2018 following up with the Kizh Nation. Subsequently a consultation meeting was set up for December 4, 2018.

The City consulted with the Kizh Nation on December 4, 2018 via conference call. The City and its consultant, ESA, provided an overview of the Project and the cultural resources study. The Kizh Nation provided their knowledge of the Project Site vicinity, including information about the natural environment and general history of the area, and known villages and trade routes/trails in the area. The Kizh Nation indicated that Santa Monica Boulevard, which bisects the PSJHC campus, was an ancient Native American trail and trade route. The Kizh Nation indicated that there could be archaeological resources and human remains related to prehistoric travel along the route, such as burials of those who may have died while on the trail. On the same day the Kizh Nation provided the City with documentation regarding a prehistoric Native American burial site, commonly known as the Haverty Site. The Haverty Site is located approximately 8 miles east of the Project Site. The discovery occurred in 1924 and consisted of multiple human skeletal remains

recovered from a depth of approximately 19 feet. The Kizh Nation also provided statements from the SCCIC and NAHC regarding the limitations of their data on file, and their general recommendation to contact Tribal groups in addition to consulting their records, as well as a statement from a local archaeologist that site surveys do not always identify evidence of subsurface resources. While the Kizh Nation did not identify any known tribal cultural resources (as defined in PRC Section 21074) within the Project Site, they have indicated that the Project Site has a high sensitivity for the presence of unknown, subsurface archaeological resources and human remains. In response to their indications of high sensitivity, the analysis and mitigation measures in *Section* 4.5, *Cultural Resources - Archaeological/Paleontological Resources,* of the EIR reflect input received from the Kizh Nation.

As a result of the City's consultation efforts, no tribal cultural resources have been identified within the Project Site or vicinity. The AB 52 Native American consultation documentation is provided in Appendix C of this EIR.

4.18.3 Regulatory Framework

California Environmental Quality Act – Assembly Bill 52

AB 52 was approved by California State Governor Edmund Gerry "Jerry" Brown, Jr. on September 25, 2014. The act amended California Public Resources Code (PRC) Section 5097.94, and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 applies specifically to projects for which a Notice of Preparation (NOP) or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration (MND) will be filed on or after July 1, 2015. The primary intent of AB 52 is to include California Native American Tribes early in the environmental review process and to establish a new category of resources related to Native Americans that require consideration under CEQA, known as tribal cultural resources (as defined in PRC Section 21074(a)). On July 30, 2016, the California Natural Resources Agency adopted the final text for tribal cultural resources update to Appendix G of the *State CEQA Guidelines*, which was approved by the Office of Administrative Law on September 27, 2016.

PRC Section 21080.3.1 requires that within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a tribal representative, of California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC Section 21073) and who have requested in writing to be informed by the lead agency (PRC Section 21080.3.1(b)). Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency's formal notification and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation (PRC Sections 21080.3.1(d) and 21080.3.1(e)).

PRC Section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project's impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either: (1) the parties agree to measures to mitigate or avoid a significant effect, if

a significant effect exists, on a tribal cultural resource, or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC Section 21080.3.2(b)).

If a California Native American tribe has requested consultation pursuant to Section 21080.3.1 and has failed to provide comments to the lead agency, or otherwise failed to engage in the consultation process, or if the lead agency has complied with Section 21080.3.1(d) and the California Native American tribe has failed to request consultation within 30 days, the lead agency may certify an EIR or adopt an MND (PRC Section 21082.3(d)(2) and (3)).

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Confidentiality, does not however apply to data or information that are, or become publicly available, are already in lawful possession of the project applicant before the provision of the information by the California Native American tribe, are independently developed by the project applicant or the project applicant's agents, or are lawfully obtained by the project applicant from a third party that is not the lead agency, a California Native American tribe, or another public agency (PRC Section 21082.3(c)(2)(B).

4.18.4 Environmental Impacts

4.18.4.1 Threshold of Significance

Appendix G of the State CEQA Guidelines provides a question that addresses potential impacts related to tribal cultural resources. The CEQA guidelines provides that lead agencies may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects, and the use of Appendix G as a significance threshold is routinely sanctioned by the courts (although such use is not mandatory). This question is stated below and is used by the City as the significance threshold in this section:

Would the project:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is at least one of the following:

    i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1 (k), or

    ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC

Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe

4.18.4.2 Methodology

Tribal Cultural Resources

The analysis of tribal cultural resources provided in this section is based on project notification and request to consult letters that the City submitted to Native American individuals and organizations and follow-up Native American consultations pursuant to AB 52.

4.18.4.3 Project Characteristics

The Project proposes to expand health care and related facilities within the PSJHC Campus over a period of over 20 years, with up to approximately 682,700 new square feet of floor area (660,150 square feet above-grade and 22,550 square feet below grade floor area), 10 replacement multifamily dwelling units, and enhanced vehicular and pedestrian circulation connections. As part of the Project, some existing buildings, structures, and parking lots would be demolished to make way for new construction. The Project includes the construction of both above-ground and below-ground facilities. The maximum depth of ground disturbance would be approximately 55 feet (up to five levels of subterranean parking).

4.18.4.4 Project Impacts

Tribal Cultural Resources

***Impact* TCR-1:** *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is either:*

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1 (k); or

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact Statement TCR-1: The Project would not result in a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074, since no tribal cultural resources were identified as located within the Project Site, or its immediate adjacency. No impacts to tribal cultural resources would occur.

As discussed above, the City submitted request to consult letters to the identified Native American individuals and organizations on the CEQA Tribal Consultation List on August 27, 2018. On September 5, 2018, the City received a letter via email from Mr. Andrew Salas, Chairperson, of the Kizh Nation as part of the AB 52 consultations. In the letter, the Kizh Nation indicated that the Project Site "is located within a sensitive area" requested formal AB 52 consultation with the City for the Project. The City met with the Kizh Nation on December 4, 2018. The Kizh Nation indicated

that since Santa Monica Boulevard, which bisects the Project Site, was an ancient Native American trail and trade route and there is a potential for archaeological resources and human remains in the Project Site. However, the Kizh Nation did not identify any tribal cultural resources as defined in PRC Section 21074.

As a result of the City's consultation efforts, no tribal cultural resources have been identified within the Project Site or vicinity. Therefore, the Project would not cause an impact to tribal cultural resources. An analysis of impacts to archaeological resources and mitigation measures to reduce potential impacts are provided in Section 4.5, *Cultural Resources – Archaeological/ Paleontological Resources,* of this EIR.

4.18.4.5 Cumulative Impacts

No tribal cultural resources have been identified at the Project Site or its vicinity. Further, in association with CEQA review, future cumulative projects would be required to engage in AB 52 consultations with Native American tribes in order to identify potential tribal cultural resources that could be impacted by construction/grading activities occurring in the subsurface. Therefore, cumulative impacts would be less than significant.

4.18.5 Mitigation Measures

No mitigation measures are required.

4.18.6 Level of Significance after Mitigation

The Project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074; therefore, the Project would cause no impact to tribal cultural resources and no mitigation measures are required.

4.19 Utilities – Water Supply

4.19.1 Introduction

This section describes existing water supply and infrastructure, and assesses the adequacy of water supply and infrastructure to serve the Project. The focus of this section is on water demand for domestic use. For analysis of water availability for firefighting (e.g., fire flow), see Section 4.16, *Fire Protection*, of this EIR.

The data and conclusions in this section regarding the adequacy of water infrastructure to provide the domestic water required to serve the Project is based on the August 2018 Fire and Domestic Water Study (Water Study) prepared for the Project by KPFF Consulting Engineers, included in Appendix M of this EIR (KPFF 2018). The data and conclusions in this section regarding the availability of water resources to serve the Project are based on the September 2018 Water Supply Assessment (WSA) prepared for the Project by Todd Groundwater under the City's direction, included in Appendix M of this EIR (Todd Groundwater, 2018).

4.19.2 Environmental Setting

4.19.2.1 Existing Water Demand and Infrastructure

As discussed in depth in Chapter 2, *Project Description*, of this EIR, the Project Site includes nine Phase II development sites within the greater Providence Saint John's Health Center (PSJHC) Campus. The existing land uses at the Phase II development sites include three medical buildings (e.g., Child Family Development Center [CFDC], Foundation Building, John Wayne Cancer Institute), two temporary MRI modular buildings, a 10-unit vacant apartment building, Mullin Plaza, and several surface parking lots. **Table 4.19-1**, *Average Historical (2008-2018) Water Use at the Project Site*, identifies the metered-based average historical (e.g., 2008-2018) water use for the Project Site. As indicated therein, the average historical water use for the Phase II development sites is 8.3 AFY. (Todd Groundwater 2018)

TABLE 4.19-1
AVERAGE HISTORICAL (2008-2018) WATER USE AT THE PROJECT SITE

Building Name	Building Type	Historical Demand (AFY)
John Wayne Cancer Institute (JWCI)	Medical clinic and laboratories	3.7
	Medical Offices	0.0
	Office	2.1
Child and Family Development Center (CFDC)	Day care and medical clinics	0.0
	Maintenance and storage	0.0
Saint John's Foundation Building	Office	1.8
MRI Building	Medical	0.2
Housing	Housing	0.5
		TOTAL 8.3

SOURCE: Todd Groundwater, Water Supply Assessment for Providence Saint John's Health Center Phase II Project, November 2018.

The City's Water Resources Division is a retail water agency providing water service throughout the City. The City distributes water to approximately 18,000 customers through a 250-mile network of City-owned water lines ranging from 6 to 36 inches in diameter (City of Santa Monica, 2016). These 18,000 customer accounts include an estimated City population of approximately 93,283 persons. In addition, thousands of commercial and institutional customers, and widely fluctuating daytime population of employees, tourists, and visitors are served.

The City provides water to the Project Site through a series of municipal water lines located in the surrounding streets and by water laterals between these lines and the existing on-site uses. The existing water infrastructure in the vicinity of the Project Site is shown in **Figure 4.19-1**, *Existing Water Infrastructure.* As indicated therein, there are nine municipal water lines in the surrounding streets, including:

- 8-inch lines in 20th Street, Arizona Avenue, Broadway, and 23rd Street;
- 12-inch lines in Santa Monica Boulevard, Broadway, and 21st Street; and
- 24-inch lines in Arizona Avenue and Broadway. (KPFF 2018)

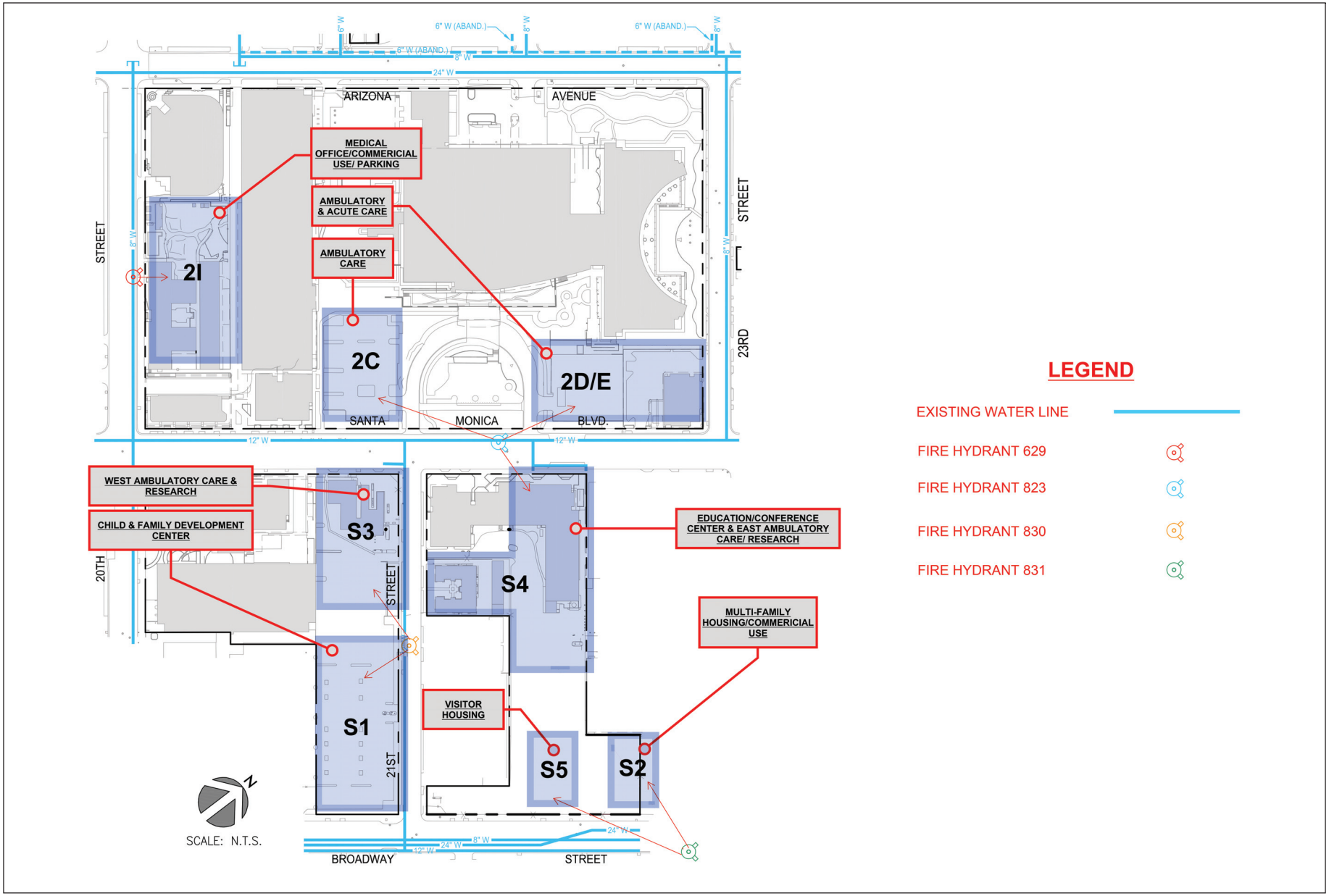
The Project Site is currently served by water service laterals connected to the 8-inch water line in 20th Street and the 12-inch water lines in 21st Street, Santa Monica Boulevard and Broadway. (KPFF 2018) In addition to the water lines and laterals, there are 21 fire hydrants located along the streets bordering the Project Site. See Section 4.16 of this EIR for further discussion.

4.19.2.2 City Water Supply

The City of Santa Monica receives potable water from three major sources: (1) groundwater from production wells within the City; (2) imported water from the Metropolitan Water District of Southern California (MWD): and (3) recycled urban runoff. The historical water supplies from these sources are shown in **Table 4.19-2**, *Historical Water Supply*. As indicated therein, the City's water supply has fluctuated slightly over the last seven years, with on average 8,837 AFY from groundwater, 5,696 AFY from imported water, and 124 SFY from the Santa Monica Urban Runoff Return Flow (SMURRF) plant, for a total of 14,657 AFY. Groundwater is extracted within the City, MWD imported water comes from both the State Water Project and the Colorado River Aqueduct, and recycled urban runoff is produced at the SMURRF plant. (Todd Groundwater 2018)

Groundwater

The City obtains its groundwater supply from the Santa Monica Groundwater Basin (SMGB). The SMGB, DWR basin number 4-11.01, is in the northwest portion of the Coastal Plain of Los Angeles Groundwater Basin. It is bounded by impermeable rocks of the Santa Monica Mountains on the north and by the Ballona escarpment on the south. The subbasin extends from the Pacific Ocean on the west to the Inglewood fault on the east. Groundwater recharge is mainly through percolation of precipitation falling on the land surface and by runoff along the front of the Santa Monica Mountains. The built-out environment and fine-grained surface soils reduce the available percolation to the aquifer. However, in the 1980s the City had a small managed recharge and recovery project in the Charnock subbasin. There are no plans to recharge in the SMGB. (Todd Groundwater 2018)



SOURCE: KPFF Consulting Engineers, Fire and Domestic Water Study – Providence Saint John's Health Center Phase II Project, August 2018

Providence Saint John's Health Center Phase II Project

Figure 4.19-1
Existing Water Infrastructure

ESA

TABLE 4.19-2
HISTORICAL WATER SUPPLY

Water Supply Sources	2010	2011	2012	2013	2014	2015	2016	7 Year Average
Groundwater	3,319	7,932	8,363	9,867	10,682	10,695	11,001	8,837
Arcadia	290	447	450	434	714	620	698	522
Charnock	593	5,168	5,277	7,824	8,377	8,114	8,311	6,238
Olympic	2,436	2,317	2,636	1,609	1,591	1,961	1,992	2,077
Imported Water	9,812	6,389	6,549	5,842	5,108	3,298	2,876	5,696
SMURRF	91	79	86	96	134	186	197	124
Total	**13,222**	**14,400**	**14,998**	**15,805**	**15,924**	**14,179**	**14,074**	**14,657**

SOURCE: Todd Groundwater, Water Supply Assessment for Providence Saint John's Health Center Phase II Project, November 2018. Based on the City's Sustainable Water Master Plan (SWMP).

In 2016, total groundwater use totaled 78 percent of total supply, whereas in 2010, groundwater was 25 percent of supply. This shift in groundwater production reflects the changing nature of the mix of supply. Until the City achieves full sustainability, continued use of imported water will be necessary. However, it is expected that the amount of imported water will steadily decrease between now and 2020. (Todd Groundwater 2018)

In addition to providing a majority of the existing potable water supply, local groundwater offers the potential for future development of additional supplies including conjunctive use with imported water. Groundwater management is a key component to long term sustainability. The City is currently preparing their Groundwater Sustainability Plan (GSP) for the basin as required under the Suitability Groundwater Management Act (SGMA) and must closely review sustainable yield and current levels of pumping to ensure long term sustainability. The City's continued efforts with their GSP will provide critical information on the future reliability of the groundwater aquifer. (Todd Groundwater 2018)

Imported Water

MWD receives water from the Colorado River and the Sacramento-San Joaquin Delta through the State Water Project. MWD then sells water to its 26-member agencies, including the City of Santa Monica. Due to groundwater quality concerns, a large portion of the City's supply came from imported water between the mid-1990s and 2010. Table 4.19-2 shows the imported water supply to the City from 2010 to 2016. Over the past seven years, the mix of water supply sources has changed. Groundwater production has increased as part of the City's plan to rely on local water supply sources. As more groundwater wells have come back online, the City has relied less on imported water and more on local groundwater. In 2010, the City water supply was 74 percent imported water and in 2016, imported water was reduced to 20 percent of the total supply. According to the City's 2015 Urban Water Management Plan (UWMP), the long-term reliability of imported water is uncertain because of the increased demands for imported water from the State Water Project and the Colorado River coupled with decreased supply of these sources during dry times. (Todd Groundwater 2018)

Recycled Urban Runoff and Other Non-Potable Supplies

The City also relies on recycled dry weather urban runoff treated at its Santa Monica Urban Runoff Return Flow (SMURRF) plant. for reuse in landscape irrigation and indoor plumbing. Total water supplied by the SMURRF plant is shown in Table 4.19-2. SMURRF deliveries account for one percent of total City water supply. With a maximum production capacity of 560 AFY, the SMURRF has been operated at an average of 21 percent capacity over the past five years, and has increased its production each year since 2011. The City plans to increase its supply from mon-potable sources through its Sustainable Water Infrastructure Project (SWIP). The SWIP will include upgrades to the SMURFF, a new shallow brackish and saline groundwater extraction well at the beach, a new stormwater and sewer treatment facility, and two new stormwater harvesting tanks. (Todd Groundwater 2018) The Project Site and greater PSJMC Campus are not currently recipients of recycled water from the SMURFF. (Todd Groundwater 2018)

Water Supply in Normal and Drought Periods

The California Water Code requires a WSA to include discussion of how supply will meet demand during normal, single dry, and multiple dry years during a 20-year projection. The City's 2015 UWMP provides discussion of water supply and demand in normal and drought periods, included herein by reference. Based on the City's 2015 UWMP, Table 8 in the WSA summarizes water supply and demand for the City in a normal year, while Tables 9 and 10 in the WSA show supply and demand in single-year and multi-year dry conditions. City water supply and demand projections during normal, single-year dry, and multi-year dry conditions are summarized in the impact analysis later in this section. (Todd Groundwater 2018)

Water supply is expected to remain similar in normal and drought periods. Given that MWD expects to meet demands, and groundwater and recycled water are available in dry years, the City can expect to meet future demands for both single and multiple dry years through 2040. (Todd Groundwater 2018)

4.19.2.3 City Water Demand

The City provides water through approximately 19,000 metered service connections. **Table 4.19-3**, *Historical City Water Demand by Water Use Sector (in AF)*, documents the historical water demand for the City's service area by water use sectors between 2010 and 2015. The water use sectors (e.g., customer types) are listed on the left. Water loss is typical in all water distribution systems due to small leaks, firefighting activities, and system testing and maintenance activities. As indicated therein, the total potable water use in 2015 was 11,941 AFY, which is approximately 14 percent less than the previous year 2014. This reflects the success of the City's Sustainable Water Master Plan (SWMP), which is described below, and new water conservation focus; most of the water savings were for single family residences and landscape irrigation. Approximately 63 percent of the potable water consumption in 2015 was by single-family and multi-family residential customers. (Todd Groundwater 2018)

TABLE 4.19-3
HISTORICAL CITY DEMAND BY WATER USE SECTOR (in AF)

Water Use Sector	Actual Water Demand (AFY)					
	2010	2011	2012	2013	2014	2015
Single Family Residential	2,931	2,798	3,113	3,142	3,216	2,545
Multi-Family Residential	5,100	5,517	5,503	5,554	5,441	4,959
Commercial/Institutional	3,003	3,152	3,544	3,704	3,721	3,405
Industrial	0	0	0	0	0	0
Landscape Irrigation	538	531	604	604	643	408
System Loses	1,286	1,086	561	1,013	925	624
Total Water Consumption	**12,858**	**13,084**	**13,325**	**14,017**	**13,946**	**11,941**

Acronyms/Abbreviations: AFY = acre-feet per year

SOURCE: Todd Groundwater, Water Supply Assessment for Providence Saint John's Health Center Phase II Project, November 2018. Based on City of Santa Monica, 2015 UWMP, Table 4.4. June, 2016.

Water Demand in Drought Periods

The Los Angeles region has experienced major droughts over the last few decades and recently experienced a severe drought (2013-2015). Water conservation is critical to Southern California's water sustainability. In response to the July 2014 California State Board emergency regulations, the City implemented their Water Shortage Response Plan. In response to the worsening drought, Governor Brown issued an Executive Order on April 1, 2015 mandating a 25 percent Statewide reduction in potable urban water through February 2016. Because of the City's ongoing water conservation efforts, water demand was reduced by 12 percent between 2014 to 2016, even as the population increased by one percent. (Todd Groundwater 2018)

Water Conservation

The City takes water conservation very seriously and both the UWMP and SWMP planning documents highlight these efforts by the City.

On the State level, the Water Conservation Act of 2009 (SBx7-7) called for a 20 percent reduction in urban water use by the year 2020. The water code was amended to require 2015 and 2020 water use targets to be developed in the 2010 UWMPs and updated in the 2015 UWMPs. Per the 2015 UWMP, Santa Monica set a 2020 compliance target for per capita water consumption of 123 gallons per capita daily (gpcd).

On a City level, Santa Monica has actively pushed to conserve water for decades. Santa Monica passed its "No Water Waste" Ordinance initially in 1993, and still actively enforces water waste. The Water Efficient Landscape and Irrigation Standards were established in 2008 and continue to be updated. The City's Water Shortage Response Plan (adopted June 9, 2009) was instrumental in the last drought. A Stage 2 Water Supply Shortage was declared August 12, 2014 and required all residents to reduce water use by 20 percent and enforce other water savings. These mandatory water demand reductions are still in place.

The City has also been a signatory to the California Water Efficiency Partnership (formerly the California Urban Water Conservation Council) memorandum of understanding (MOU) since 1991. The City has actively implemented the organization's best management practices (BMP) for more than 27 years, including the current BMPs:

- BMP 1: Utility Operations
- BMP 2: Public Education & Outreach
- BMP 3: Residential Programs
- BMP 4: Commercial, Institutional, and Industrial Programs
- BMP 5: Landscape Programs (Todd Groundwater 2018)

More recent efforts include the new Water Conservation Unit (WCU), which was launched in spring 2015. The WCU is tasked with implementing and overseeing the City's water conservation programs. The WCU is also charged with "permanently establishing water conservation as the new normal in the City." The WCU has implemented several new programs including Water Use Allowances (WUAs), WUA Exceedance Citations, Enhanced Water Waste Patrols, Water School, Water Use Consultations and specialized trainings, enhanced rebate programs, customer outreach, and more. Public outreach is a continued focus of the City and WCU, including the publication of "The Water Issue" with the Santa Monica Daily Press, which provided information about the City's water infrastructure, a guide to efficient landscaping, and the need for water conservation. (Todd Groundwater 2018)

The centerpiece of the City's water sustainability plan is the Water Neutrality Ordinance. The Ordinance, effective July 1, 2017, caps water use for new developments to the average five-year historical use for that individual parcel (see the Regulatory Framework subsection below for further discussion). The City plans to keep demand at current levels to ensure their local water supply can continue to meet total City water needs.

4.19.3 Regulatory Framework

4.19.3.1 State

California Urban Water Management Plan Act

The California Urban Water Management Planning Act (California Water Code [CWC] Division 6, Part 2.6, Sections 10610-10656) addresses several State policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires water suppliers to develop water management plans every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years. Section 10632 requires that the water management plan address shortage contingency planning. Municipal water suppliers that serve more than 3,000 customers or provide more than 3,000 AFY of water must adopt a UWMP. An UWMP is intended to serve as a water supply and demand planning document that is updated every *5* years to reflect changes in the water supplier's service area, including water supply trends, and conservation and water use efficiency policies.

California Water Plan

The California Water Plan, which is required by the California Water Code Section 10005(a), is the State government's strategic plan for managing and developing water resources statewide for current and future generations. It provides a collaborative planning framework for elected officials, agencies, tribes, water and resource managers, businesses, academia, stakeholders, and the public to develop findings and recommendations and make informed decisions for California's water future. The Plan is updated every five years, with and the draft Water Plan Update 2018 currently in public review.

The plan presents the status and trends of California's water-dependent natural resources; water supplies; and agricultural, urban, and environmental water demands for a range of plausible future scenarios. The Water Plan also evaluates different combinations of regional and statewide resource management strategies to reduce water demand, increase water supply, reduce flood risk, improve water quality, and enhance environmental and resource stewardship. The assessments performed for the plan help identify effective actions and policies for meeting California's resource management objectives in the near term and for the next several decades.

Sustainable Groundwater Management Act of 2014

The Sustainable Groundwater Management Act of 2014 (SGMA) requires the designation of groundwater sustainability agencies (GSAs) by one or more local agencies and the adoption of groundwater sustainability plans (GSPs) for basins designated as medium- or high-priority by the California Department of Water Resources (DWR). SGMA grants new powers to GSAs, including the power to adopt rules, regulations, ordinances, and resolutions; regulate groundwater extractions; and to impose fees and assessments. SGMA also allows the State Water Resources Control Board (SWRCB) to intervene if local agencies do not meet the SGMA requirements.

The Santa Monica Basin is expected to be designated as a medium priority basin. Because the City's recommended future water supply portfolio includes expanded use of groundwater in the Santa Monica Basin, SGMA provides the City with an opportunity to manage the Basin or its key subbasins to sustain the City's expanded use of groundwater.

Senate Bill 610, Senate Bill 221

State legislation addressing water supply, Senate Bill (SB) 610 and SB 221, became effective January 1, 2002. SB 610, codified in CWC §10910 et seq., describes requirements for both water supply assessments (WSAs) and UWMPs applicable to the California Environmental Quality Act (CEQA) process. SB 610 requires that for projects subject to CEQA, which exceed a specified minimum size, the water supplier must prepare a Water Supply Assessment (WSA) that determines whether the projected water demand associated with a proposed project is included as part of the most recently adopted UWMP. The size requirement is specified according to development type, but generally reflect developments whose water consumption would be equivalent to or greater than the amount of water required by a 500 dwelling unit project. The proposed Project would include approximately 682,700 square feet of new floor area which the City has conservatively concluded requires the preparation of a WSA. Therefore, a WSA has been prepared for the Project.

SB 221 also addresses water supply in the land use planning process. However, this legislation, which also requires demonstration of sufficient water supply to serve a proposed subdivision, pertains to residential subdivisions of 500 units or more in non-urban areas, and therefore does not apply to the Project.

Complementary legislation to SB 610 was enacted on November 10, 2009, with the passage of SB 7, the 2009 Water Conservation Act. SB 7 mandates new water conservation goals for UWMPs, requiring urban water suppliers to achieve a 20 percent per capita water consumption reduction by the year 2020 statewide, as described in the 20 x 2020 State Water Conservation Plan (California Department of Water Resources, 2010). As such, each updated UWMP must incorporate a description of how each respective urban water supplier will quantitatively implement this water conservation mandate, in addition to the requirements of SB 610. The legislation specifies specific measures for attaining goals, and requirements for monitoring of and compliance with goals. Compliance with the water reduction target is required for continued state water grants and loan eligibility. After 2021, failure of urban retail water suppliers to meet their targets establishes a violation of law for administrative or judicial proceedings.

California Code of Regulations – Title 20

Title 20, Sections 1605.1(h) and 1605.1(i) of the California Code of Regulations (CCR) establishes efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including such fixtures as showerheads, lavatory faucets and water closets. Amongst the standards, effective January 1, 2016, the maximum flow rate is 1.2 gpm at 60 psi for lavatory faucets and aerators; 1.8 gpm with optional temporary flow of 2.2 gpm at 60 psi for kitchen faucets and aerators and 0.5 gpm at 60 psi for public lavatory faucets. The standard for water closets is 1.8 gallons per flush. In addition, Section 1605.3(h) establishes State efficiency standards for non-federally regulated plumbing fittings.

Governor's Drought Declarations

Governor Edmund G. Brown Jr. has prepared a series of executive orders to address recent draught conditions in the state. The first executive order, issued on January 17, 2014 proclaimed State of Emergency and directed State officials to take all necessary actions to make water immediately available. The proclamation included numerous measures such as asking Californians to reduce water consumption by 20 percent, directing local water suppliers to implement water shortage contingency plans, and other measures to be implemented by state agencies.

Seven subsequent proclamations have built upon and provided further guidance regarding the original order. Notably, Executive Order B-29-15, April 1, 2015, ordered the SWRCB to impose restrictions to achieve a 25-percent reduction in potable urban water usage through February 28, 2016; and directed the California DWR to lead a statewide initiative, in partnership with local agencies, to collectively replace 50 million square feet of lawns and ornamental turf with drought tolerant landscapes. The most recent proclamation, Executive Order B-37-16 on May 9, 2016, directs the SWRCB and DWR to set new water reduction targets, building upon Senate Bill No. 7. Among other provisions, it also provides guidance for new water use prohibitions and updated requirements for Water Shortage Contingency Plans.

On February 8, 2017, the SWRCB extended water conservation regulations, continuing the prohibition of wasteful practices and conservation mandates. While heavy rains in the 2016 – 2017 rain season had reduced draught conditions in some portions of the state, the Board concluded: (1) drought continues to exist in portions of the state, and snowpack and reservoir conditions for the end of the water year remain subject to significant change; (2) the drought conditions may persist or continue locally through the end of the water year; and (3) additional action by both the SWRCB and local water suppliers will likely be necessary to prevent waste and unreasonable use of water and to further promote conservation.

On April 7, 2017 the Governor declared an end to California's drought emergency in Executive Order B-40-17 for most of the California counties, inclusive of Los Angeles County. The end of the drought emergency was a result of increased rainfall is the last year and large storms during the winter of 2016 to 2017. While ending the drought declaration, the executive order notes that "…the next drought could be around the corner," and "Conservation must remain a way of life." Accordingly, conservation actions taken in Executive Order B-37-16 remain in effect.

4.19.3.2 Regional

Metropolitan Water District

The City of Santa Monica (City) purchases some of its water supply from MWD. MWD is comprised of 26 member agencies including the City. MWD is the largest water wholesaler for domestic and municipal uses in Southern California. All 26-member agencies have preferential rights to purchase water from MWD.

MWD meets the demand for water through assessments of future supply and demand, which are presented in the MWD's RUWMP, the most recent being prepared in 2015. This plan addresses the future of MWD's water supplies and demand through the year 2040. Evaluations are prepared for average year conditions, single dry-year conditions, and multiple-dry-year conditions. Data in the RUWMP shows that MWP can provide reliable water supplies under both the single driest year and the multiple-dry-year hydrologies through 2040. (MWD 2015)

MWD also prepares an Integrated Water Resources Plan (IRP). The IRP provides a water management framework that includes plans and programs for meeting future water needs. It addresses issues that can affect future water supply such as water quality, climate change, and regulatory and operational changes. The most recent IRP was adopted in January 2016 (2015 IRP). It establishes a water supply reliability mission of providing its service area with an adequate and reliable supply of high-quality water to meet present and future needs in an environmentally and economically responsible way. The 2015 IRP includes a number of strategies to meet future water demand.

4.19.3.3. Local

City of Santa Monica Sustainable Water Master Plan

The SWMP adopted in 2014 combines relevant components of existing water resource plans with an evaluation of a broad range of water supply and demand management options to assist the City in meeting its goals. The plan provides a comprehensive look at the City's water system to define

supply and demand management options to cost effectively reduce future water demands and enhance local water supply production capabilities. The SWMP includes an evaluation of expanded demand management measures and a variety of water supply alternatives including recycled water, storm water collection and treatment, rainwater harvesting, gray-water applications, and other water rights, supply and exchange opportunities to align with the City's goal of water self-sufficiency (i.e., meeting 100% of City's water demand through local sources) by 2020.

The City initiated a comprehensive update of the SWMP in 2017 to incorporate new information regarding local groundwater resources and to integrate new water conservation programs and alternative water supply opportunities. On January 9, 2018, City staff reported to Council that further analysis was needed to assess whether the City could meet its water self-sufficiency goal by 2020. A Draft SWMP was prepared for the City by Black & Veatch Corporation and issued in August 2018. Subsequent to completion of the August 2018 SWMP, Water Resources Division staff incorporated additional information (treatment feasibility study findings for the Olympic Wellfield and production efficiency enhancements for the Arcadia Water Treatment Plant) to refine the pathway to achieve water self-sufficiency and final recommendations were released through a staff report in a City Council hearing on November 27, 2018. The updated 2018 SWMP confirmed that achieving water self-sufficiency that can be maintained into the future is practical and cost effective, but the projected date of reaching that goal would be 2023. The delay from the original date is due to new state drinking water requirements implemented in 2018, permitting requirements for alternative water supply projects, and results of recently completed feasibility studies which resulted in longer timelines for project completion relative to previous estimates. (City of Santa Monica 2018)

City of Santa Monica 2015 Urban Water Management Plan

The 2015 UWMP has been prepared for compliance with the Urban Water Management Planning Act, as discussed above. The UWMP is a water management plan that identifies short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years. The UWMP identifies the supply, demand, and reliability of water supplies; and also addresses compliance with water conservation measures, contingency planning for drought conditions, and impacts on water supplies due to global climate change. An UWMP is intended to serve as a water supply and demand planning document that is updated every *5* years to reflect changes in the water supplier's service area, including water supply trends, and conservation and water use efficiency policies. The UWMP is consistent with SB 7 water conservation goals that require urban water suppliers to achieve a 20 percent per capita water consumption reduction by the year 2020 statewide; and also provide goals for the City to be 100 percent sustainable (import-free) by 2020.

City of Santa Monica Municipal Code

Section 7.16 – Water Conservation

Section 7.16 of the City of Santa Monica Municipal Code (SMMC) regulates water conservation in the City. It establishes conservation measures to be followed, provides the framework for water conservation planning, and establishes water consumption limits and fees for new development. Conservation measures include, but are not limited to, such items as watering hours, restrictions on

watering pavement or washing surfaces, and development standards for water features to ensure resource efficiency and reduced waste. In particular, Section 7.16.050 requires that new development pay fees to mitigate the estimated daily water consumption rate projected for a new development.

City of Santa Monica Water Neutrality Ordinance

The City adopted on May 23, 2017, a water neutrality ordinance (Section 7.16.050 of the Santa Monica Municipal Code). Under the water neutrality ordinance, new development must offset all increases in average five-year historical water use at a ratio of 1:1, except for 100% affordable housing projects which must offset water demand at a ratio of 0.5:1. The water offsets shall be achieved with on-site water efficiency measures. If on-site efficiency measures cannot be reasonably achieved on-site, the applicant may achieve off-set requirements by payment of in-lieu fees or performing/undertaking the requirements at an off-site location.

City of Santa Monica Water Shortage Response Plan

The City's Water Shortage Response Plan (WSRP) has been adopted by the City Council pursuant to requirement of SMMC Section 7.16.030, and California Water Code Section 10632. The WSRP is intended as an action plan and is designed to reduce water demand during water shortages. The WSRP establishes *5* stages of water shortage severity based on predicted or actual water supply reductions. Each stage establishes water use reductions through voluntary or mandatory measures. Triggers for implementing the WSRP may include such events as a state or local emergency, natural disaster, a localized event that critically impacts the water supply, drought, or Santa Monica's wholesale water agency imposing water allocation restrictions.

The plan establishes Water Use Allowances (WUAs) tied to the stage of shortage severity. City-wide use reduction goals associated with the five stages vary from 10 percent to 50 percent. Other provisions of the SMMC provide penalties and remedies for violation of the WSRP.

City of Santa Monica Land Use and Circulation Element

The City's Land Use and Circulation Element (LUCE) includes policies that promote water conservation and sustainability. These policies, Policies S6.1 through S6.8, are intended to ensure sufficient water supplies for new development, ensure the implementation of UWMPs, encourage water conservation (landscaping requirement in new projects and retrofitting of existing development), continue remediation of the City's contaminated groundwater supply, increase the use of groundwater consistent with safe yields, and encourage the preparation of a groundwater management plan. The City has been pursuing these policies as indicated in the discussion of the applicable plans and ordinances above.

4.19.4. Environmental Impacts

4.19.4.1 Thresholds of Significance

Appendix G of the State CEQA Guidelines provides questions that address potential impacts related to water supply. The CEQA guidelines provides that lead agencies may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects, and the use of Appendix G as a significance threshold is routinely sanctioned by the courts (although such use is

not mandatory). These questions are listed below and are used as the significance thresholds by the City in this section.

Would the Project:

a) Require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects?

b) Not have sufficient water supplies available to service the project and reasonably foreseeable future development during normal, dry and multiple dry years?

4.19.4.2 Methodology

This section evaluates the capacity of local water infrastructure and the availability of water resources to accommodate the net increase in water demand associated with the proposed Project. The analysis of water infrastructure adequacy is based on the August 2018 Fire and Domestic Water Study (Water Study) prepared for the Project by KPFF Consulting Engineers, included in Appendix M of this EIR (KPFF 2018).

The focus of this section is on water demand for domestic use. For analysis of water availability for firefighting (e.g., fire flow), see Section 4.16, *Fire Protection*, of this EIR. The domestic water demand associated with the Project was estimated in the WSA prepared for the Project and included in Appendix M of this EIR.

Water Infrastructure

The ability of the local water lines to provide the domestic water required by the Project is based on data, analysis and conclusions in the Water Study, which in-turn are based in part on fire hydrant tests conducted to measure the existing flow rates and pressures in the municipal water lines that would serve the Project. The City conducted flow tests using four hydrants located on 20th Street, Santa Monica Boulevard, 21st Street, and Broadway. These fire hydrants, the locations of which are shown in Figure 4.19-1, were suggested by City staff in order to account for the entire Project area. The flow from the hydrants tested was used to calculate the available flow in the public water mains.

Water Supply

The analysis of water availability to serve the Project is based on the WSA prepared for the Project and included in Appendix M of this EIR. (Todd Groundwater 2018) The WSA estimates the total net increase in peak water demand associated with the Project, along with cumulative water demand in the City, and compares this demand to the City's available water supply. The reliability of water supply analysis in the WSA is based on information in the City's 2015 UWMP. The analysis identifies the expected supply of water to the expected demand in 5 year increments between 2020 and 2040 during normal, single-dry, and multiple-dry years. Also, data from 2040 is extrapolated to determine available supplies in 2041 at Project buildout.

4.19.4.3 Project Characteristics

The Project would demolish existing medical research/laboratory, medical office, day care, office, vacant residential apartment uses, and surface parking within the Project Site, and develop new hospital/health care, medical research, medical office, neighborhood commercial, restaurant, day care, and multifamily residential uses, with up to 682,700sf of floor area. The on-site uses would consume water in a manner typical of such uses, which are quantified below.

The domestic water required for the Project would be sourced from existing and new public water mains. The proposed water infrastructure improvements are identified in **Figure 4.19-2**, *Proposed Water Infrastructure*. As indicated therein, the northern portion of the existing 12-inch water line in 21st Street would be removed and capped to accommodate for the proposed subterranean parking. In its place, a new water line would be installed to the west (between S1 and S3 beneath the proposed South Campus West Driveway). This new water line would then run east and then connect back to the existing water line in 21st Street. Alternatively, the northern portion of the water line in 21st Street would be removed and replaced with the new line routed through the ceiling of the subterranean parking. Additionally, new water laterals would connect the proposed buildings to the existing 8-inch water line in 20th Street and the existing 12-inch water lines in 21st Street, Santa Monica Boulevard and Broadway. All construction work or use of the public right-of-way (i.e., streets) including encroachments, would require a permit from the City's Public Works Department.

With regards to recycled water infrastructure improvements, the Project Site and greater PSJHC Campus are not currently recipients of recycled water from the SMURFF, and there are currently no plans to connect the Project with the SMURFF at this time. (Todd Groundwater 2018).

At this time, specific water conservation features to be incorporated into the Project are not yet known. As part of the Development Agreement negotiations, water conservation features that go beyond Title 20 water efficiency requirements may be included. The analysis provided therein is conservative as it does not account for additional water savings that could result from these water conservation features.

4.19.4.4 Project Impacts

Water Infrastructure

Impact WS-1: *Would the Project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects?*

Impact Statement WS-1: The Project would connect to the existing municipal water lines in the streets adjacent to the Project Site, and these lines have adequate capacity to serve the Project. No new or expanded municipal water lines would be required. While minor municipal water line relocation or replacement would be required, the environmental effects associated with this relocation/replacement would be less than significant.

LEGEND:

OPTION 1 WATER LINE ROUTING: — W —

OPTION 2 WATER LINE ROUTING: — W —

PROPOSED OPTION 1 LATERAL:

PROPOSED OPTION 2 LATERAL:

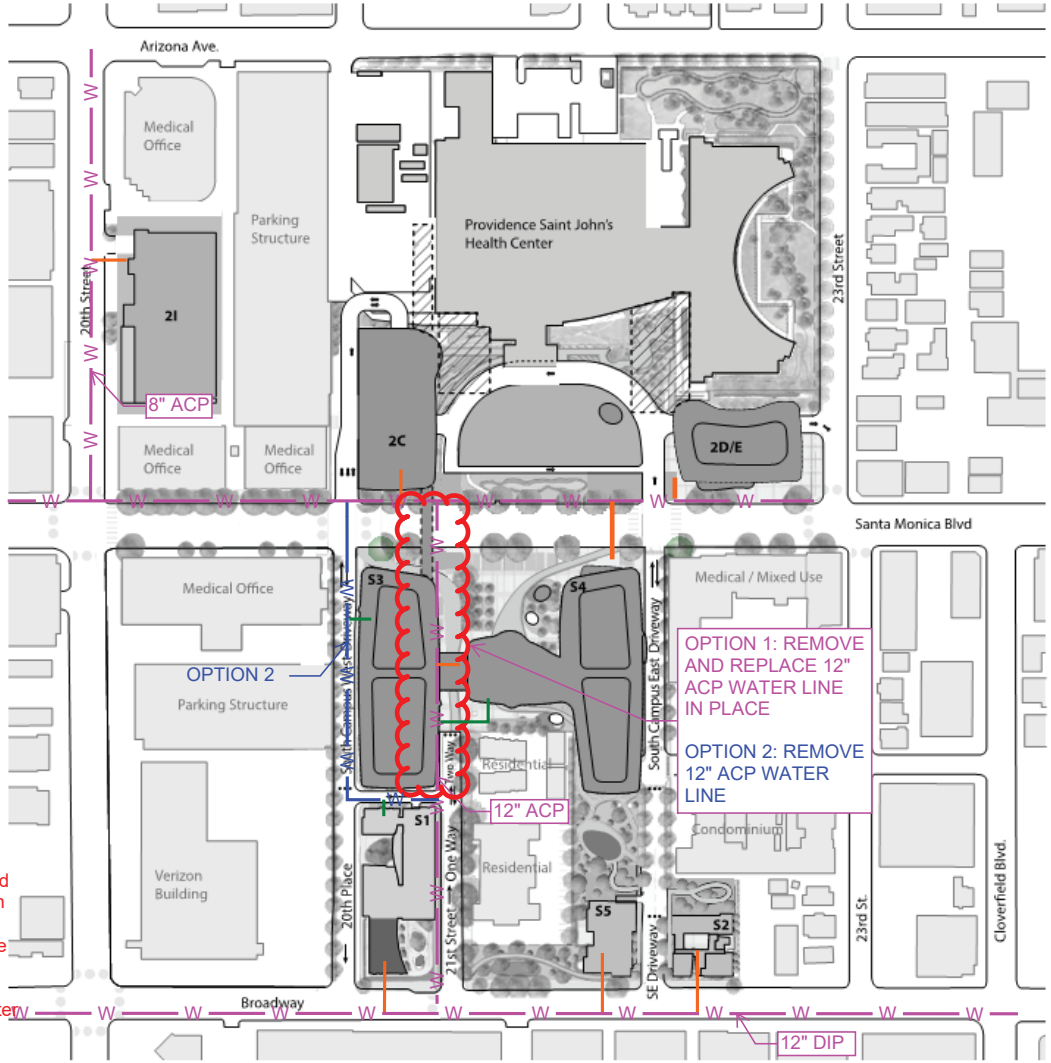
NOTE: LOCATION OF EXISTING AND PROPOSED SERVICES ARE APPROXIMATE LOCATIONS AND ARE SCHEMATIC. PLEASE CONSULT ASBUILTS AND SURVEY FOR MORE ACCURATE LOCATION.

OPTION 1 EXPLANATION

Option 1 for the proposed Providence St. John's Campus consists of removing and replacing the existing 12" ACP in 21st street and routing the new water line at the ceiling of the proposed subterranean parking of S4. Buildings S4 and S3 can be serviced by this line or by the line on Santa Monica Blvd. S1 can be serviced by the existing line in 21st Street or the existing line in Broadway. Lateral locations are subject to change.

OPTION 2 EXPLANATION

Option 2 for the proposed Providence St. John's Campus consists of the removal of the existing 12" ACP water line in the north half of 21st Street to accommodate for the proposed subterranean parking of Building S4. The line will be capped at the extent of the removal. In addition to cutting and capping the existing line, a new water main is proposed between S1 and S3 where it will then turn North along the proposed South Campus West Driveway. The line would connect to the existing main in Santa Monica Blvd. Building S1 and S3 could be serviced by the proposed main in South Campus West Driveway. Buildings S5 and S2 will connect to the existing water main in Broadway. Building S4 will connect to the existing water main in Santa Monica Blvd. The existing residential buildings (not part of PSJ's property) would connect to the remaining water line in the southern portion of 21st Street.



D170258.00

SOURCE: KPFF Consulting Engineers, Fire and Domestic Water Study – Providence Saint John's Health Center Phase II Project, April 2018

Providence Saint John's Health Center Phase II Project

Figure 4.19-2
Proposed Water Infrastructure

ESA

The Project would connect to the existing municipal water lines in the streets adjacent to the Project Site. As the following analysis demonstrates, these lines have adequate capacity to meet the domestic water needs of the Project. While a portion of an existing 12-inch water line in 21st Street between Santa Monica Boulevard and Broadway may need relocation or replacement under the Project, this relocation is included as part of the Project. Furthermore, any connections to the water system would constitute minor improvement to existing infrastructure, the construction of which would not cause significant environmental effects.

Water Infrastructure Results

The City conducted flow tests using four fire hydrants located along 20th Street, Santa Monica Boulevard, 21st Street, and Broadway, the locations of which were suggested by City staff, to account for all the Phase II Development Sites associated with the Project. (KPFF 2018) The 17 other fire hydrants in the Project vicinity would provide additional capacity beyond that demonstrated in the flow test results. The flow from the hydrants was used to calculate the available flow in the public water mains. Below is a summary of the flow analysis test results in the Water Study for domestic water (included as Appendix M of this EIR). For analysis of the adequacy of the adequacy of the water system for fire flow, see Section 4.16, *Fire Protection*, of this EIR.

Broadway 12-Inch Water Line

As shown in Figures 4.19-1 and 4.19-2, fire hydrant 831 (FH 831) (e.g., the 12-inch water line in Broadway) is projected to serve proposed Buildings S5 and S2. Per the flow test results, the total available flow for FH 831 is 2,353 gpm at 82 psi, or 5,711 gpm at 20 psi. The required peak domestic water demand for the proposed buildings to be serviced by FH 831 is estimated to be 14.22 gpm. Therefore, adequate flow capacity is available in FH 831 (e.g., the 12-inch water line in Broadway) to meet the domestic water needs of proposed Buildings S5 and S2.

Santa Monica 12-Inch Water Line

As shown in Figures 4.19-1 and -2, proposed Buildings 2C, 2D/E, and S4 would be served by FH 823 (e.g., the 12-inch water line in Santa Monica Blvd.). The total available flow for FH 823 is 2,468 gpm at 85 psi, or 5,447 gpm at 20 psi. The required peak domestic water demand for these buildings is estimated to be approximately 212.97 gpm. Therefore, adequate flow capacity is available in FH 823 (e.g., the 12-inch water line in Santa Monica Blvd.) to meet the domestic water needs of proposed Buildings 2C, 2D/E, and S4.

21st Street 12-Inch Water Line

As shown in Figures 4.19-1 and -2, proposed Buildings S1 and S3 would be served by FH 830 (e.g., the 12-inch water line in 21st St.). The total available flow for FH 830 is 4,240 gpm at 20 psi. The required peak domestic water demand for these proposed buildings is estimated to be approximately 80.95 gpm. Therefore, adequate flow capacity is available in FH 830 (e.g., the 12-inch water line in 21st St.) to meet the domestic water needs of proposed Buildings S1 and S3.

20th Street 8-Inch Water Line

As shown in Figures 4.19-1 and -2, FH 629 (e.g., the 8-inch water line in 20th St.) would serve proposed Building 2I. The total available flow for this fire hydrant is 7,149 gpm at 20 psi. The required peak domestic water demand for proposed Building 2I is estimated to be 30.91 gpm. Therefore, adequate flow capacity is available in FH 629 (e.g., the 8-inch water line in 20th St.) to meet the domestic water needs of proposed Building 2I.

Analysis

Based on the flow analysis above, the existing municipal water lines serving the Project Site are adequate to provide the domestic water flow required for the Project, and no new or expanded off-site municipal water lines would be required. However, as indicated previously, the Project would include the relocation or replacement of an existing municipal water line in 21st Street. In addition, the construction of an on-site water distribution system would be required, as would the construction of laterals connecting this system to the greater off-site water system. Based on the flow analysis above, the existing municipal water lines that would serve the Project would be adequate to provide the domestic water flow required for the Project. No new or expanded municipal water lines would be required.

The analysis of the environmental effects associated with constructing the Project's necessary water infrastructure improvements is already subsumed in the impact analysis for the proposed Project in other sections of this EIR (e.g., Sections 4.2, *Air Quality*; 4.5, *Archaeological/Paleontological Resources*; 4.13, *Noise and Vibration*; 4.17, *Transportation*, etc.). Construction activities associated with the required off-site water infrastructure improvements could potentially cause a disruption in water service, temporarily interfere with traffic and circulation, and generate some temporary noise during the construction period. However, all construction work within or encroaching into the public right-of-way would be subject to a permit by the City's Public Works Department. Issuance of a permit would avoid or minimize disruptions of water service to nearby properties. Additionally, implementation of the proposed Construction Management Plan (PDF-TR-1) would avoid any substantial disruption of traffic, bicycle and pedestrian circulation, and because any construction noise would be temporary, would occur within the rights-of-way of the existing streets within a largely commercial area, and would be required to comply with all applicable regulations (including the prohibition of nighttime construction activities), any associated construction noise would not exceed applicable noise thresholds at noise-sensitive uses. Therefore, the Project would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects, and the impact would be less than significant.

Water Supply

Impact WS-2: *Would the project have sufficient water supplies available to service the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

Impact Statement WS-2: The City would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

As indicated in **Table 4.19-4**, *Estimated Project Water Demand*, the Project's new land uses would generate an estimated average annual demand of 215 AFY, for a net increase of 206.7 AFY beyond existing conditions (8.3 AFY).

The City's 2015 UWMP analyzes the reliability of the City's water resources to meet water demand for normal, single-dry and multiple-dry year scenarios though 2040. Selected data from the UWMP is provided in **Table 4.19-5**, *Water Supply and Demand Projections (AF)*. Data is shown for 2020 and 2040 for all three scenarios. As indicated therein, the City's 2020 water supply during the normal, single-dry, and multiple-dry year scenarios is projected to be 158 percent, 145 percent, and 154 percent of demand, respectively, while the City's 2040 water supply during these scenarios is projected to be 155 percent, 142 percent, and 150 percent of demand, respectively. Therefore, the UWMP projects that the City would have adequate water supply to meet its demand, and in fact would have substantially more supply than demand, through at least the 2040 planning horizon of the UWMP. This projected surplus is based, in part, on the aggressive water conservation measures being implemented in the City that are projected to result in a reduction in Citywide per capita water demand between 2020 and 2040 which will partially offset the increase in water demand associated with City growth during this period. (Todd Groundwater 2018)

As indicated in Table 4.19-5, the City's water surplus during 2040 is projected to be 7,223 AF, 6,031 AF, and 6,659 AF during the normal, single-dry, and multiple-dry year scenarios respectively. The Project would reach its full water demand by 2041. In 2041, the available water supply shown in Tables 4.19-5 would be the same as shown for 2040. However, under the normal year, single dry year and multiple dry year scenarios, the demand would be expected to increase by less than one percent, which would result in available water surplus' generally ranging from approximately 6,500 AF per year under multiple dry year conditions to approximately 7,000 AF per year under normal conditions. Accordingly, the City will have sufficient water supply in 2040 and beyond in 2041 for the entire Project (206.7 AFY) and other planned water demand across the City. Therefore, the City's water supplies are adequate to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years, and the impact would be less than significant.

With regard to Project consistency with the City's Water Neutrality Ordinance, the proposed Project would be required to off-set its increase in water use on-site or off-site in compliance with the City's Water Neutrality Ordinance. Specific water conservation features (that exceed Title 20 efficiency standards) have not yet been identified, but Providence Saint Johns will implement features on the development sites or elsewhere on the PSJHC campus to minimize increased water demand and thereby align with the City's continued water conservation mission. (Todd Groundwater 2018)

TABLE 4.19-4
ESTIMATED PROJECT WATER DEMAND

Water Demand	Building Use	Size	Units	Average Daily Sewer Flow Rate	Peak Daily Demand (gpd)	Avg Daily Demand (gpd)	Avg Demand (AFY)
Child and Family Development Center	S1 – Counseling Center	25,500	sf	120/1000 gr sq ft	8,798	3,519	4
	S1 – School: Nursery Day Care	73	persons	9/person	1,889	756	1
Multifamily Housing	S2 –Residential:	10	units	150/dwelling Unit	4,313	1,725	2
	S2 –Commercial Use	800	sf	50/1000 gr sq ft	115	46	0
	S2- Parking	23,987	sf	20/1000 gr sq ft	1,380	552	1
West Ambulatory Care South Campus	S3- Medical Lab	58,000	sf	250/1000 gr sq ft	41,688	16,675	19
	S3- Medical Office/Clinic	65,000	sf	250/1000 gr sq ft	46,719	18,688	21
	S1/S3- Parking	17,479	sf	20/1000 gr sq ft	17,479	6,992	8
Education & Conference Center, East Ambulatory Care	S4 –Auditorium	250	seats	3/seats	2,156	862	1
	S4 – Office	12,196	sf	120/1000 gr sq ft	12,196	4,878	5
	S4 –Medical Office/Clinic	155,000	sf	250/1000 gr sq ft	111,406	44,562	50
	S4/S5 - Parking	118,265	sf	20/1000 gr sq ft	26,590	10,636	12
Visitor Housing	S5 –Residential: Apt. 1 bed/2	34	units	150/dwelling Unit	14,663	5,865	7
West Ambulatory Care North Campus	2C –Medical Office/Clinic	117,500	sf	250/100	84,454	33,782	38
	2C- Parking	462,429	sf	20/1000 gr sq ft	6,800	2,720	3
East Ambulatory Care North Campus	2D/E –Medical Office/Clinic	78,500	sf	250/100 gr sq ft	56,422	22,569	25
	2D-Parking	115,729	sf	20/1000 gr sq ft	6,655	2,662	3
Mullin Plaza Café Saint John's Café	Neighborhood Commercial Use	4,500	sf	50/1000 gr sq ft	647	259	0
20th Street Medical Building	2I- Medical Office/ Clinic	50,000	sf	250/1000 gr sq ft	35,938	14,375	16
	2I- Parking	137,828	sf	20/1000 gr sq ft	7,925	3,170	4
TOTAL					**488,233**	**195,293**	**215**

SOURCE: Todd Groundwater, Water Supply Assessment for Providence Saint John's Health Center Phase II Project,, November 2018.

TABLE 4.19-5
WATER SUPPLY AND DEMAND PROJECTIONS (in AF)

	2020	2040
Normal Water Year		
Supply	20,469	20,469
Demand	12,933	13,246
Supply/Demand Difference	7,536	7,223
Supply/Demand %	158%	155%
Single-Dry Year		
Supply	20,469	20,469
Demand	14,097	14,438
Supply/Demand Difference	6,372	6,031
Supply/Demand %	145%	142%
Multiple-Dry Years (@ 3rd Year)		
Supply	19,906	19,906
Demand	12,933	13,247
Supply/Demand Difference	6,973	6,659
Supply/Demand %	154%	150%

Acronyms/Abbreviations: AF = acre-feet; N/A = not available

SOURCE: ESA 2018. Based on Todd Groundwater, Water Supply Assessment for Providence Saint John's Health Center Phase II Project, Tables 8 through 10, November 2018.

The above analysis is conservative because it assumes that Project water demand is not accounted for in the UWMP's water demand projections, when in fact the Project's water demand is mostly likely included in these projections. This is because the projections are based largely on zoning, and the Project Site is already vested by the 1998 PSJHC DA for more than the amount of development proposed under the Project. The above analysis is also conservative because it does not account for the reductions in Project water demand that would result from applicable water conservation requirements and by any additional water conservation measures agreed to between the Applicant and the City. Lastly, the above analysis is conservative because the 2015 UWMP was completed prior to the adoption of the City's Water Neutrality Ordinance such that the City's future water demand would likely be less than that projected in the 2015 UWMP.

4.19.4.5 Cumulative Impacts

Water Infrastructure

Development of the Project, in conjunction with the 112 of the 131 cumulative projects in the City, would cumulatively increase the demand on the City's municipal water infrastructure system and could potentially require relocation or construction of new or expanded water infrastructure, the construction or relocation of which could cause significant environmental effects. However, each new projects would be subject to City review to assure that the existing public water lines would be adequate to meet domestic water demands. In addition, as indicated in the water infrastructure

analysis for the Project above: (1) the local municipal water infrastructure in the vicinity of the Project Site has sufficient capacity to meet the Project's domestic water needs, with the Project's infrastructure improvements, and the construction of new or expanded water lines would not be required; and (2) while the Project would require the relocation of an existing municipal water line, the environmental effects of this relocation would be less than significant. Furthermore, the City conducts ongoing evaluations to ensure its water infrastructure system is adequate to meet service needs, with infrastructure system improvements implemented as needed as part of the City's Capital Improvements Program (CIP). Therefore, the Project's contribution to cumulative demand for municipal water infrastructure would not be cumulatively considerable, and cumulative water infrastructure impacts would be less than significant.

Water Supply

New development occurring within the City would cumulatively contribute to the number of people and activities requiring the consumption of water. Such increase in water usage that could occur due to cumulative development has been generally accounted for within the City's 2015 UWMP, which incorporates expected growth through 2040.

As described in the water supply analysis for the Project above, the City would have substantial surplus water capacity in 2020 and 2040 (as well as in 2041) under normal, single-dry, and multiple dry scenarios, and would have water supplies to serve the Project along with its existing obligations and projected growth, without the need for expanded water entitlements. Thus, the City would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years. Furthermore, as stated previously, this analysis is conservative because: (1) the water demand estimates for the Project do not take into account the water savings associated with applicable water conservation requirements and any additional water conservation measures agreed to between the Applicant and the City to be negotiated as part of the Development Agreement; and (2) the 2015 UWMP's projected 2020 and 2040 City water demand estimates were completed prior to the adoption of the City's Water Neutrality Ordinance which requires all new development to offset its increase in water demand. Therefore, the City's future water demand would likely be less than projected in the UWMP.

The City will continue to monitor water supply and demand as part of its SWMP and achievement towards the 100 percent water self-sufficiency goal. Additionally, the City is required to prepare and periodically update its UWMP to ensure that water supplies are available to meet existing and projected demands. The UWMP accounts for existing water demand within the City, as well as projected increases in water demand due to growth development. Additionally, under the provisions of SB 610, the City is required to prepare a WSAs for larger development projects within its service area (e.g. projects equivalent to at least 500 dwelling units, or 1,000 employees/500,000 square feet of shopping centers or business establishments) that demonstrates that adequate water is available to serve the proposed development as well as the City's existing and projected demand.

Based on the above, the Project would not contribute considerably to cumulative water supply impacts, and the cumulative water supply impact would be less than significant.

Climate Change

Over the long-term, climate change may affect yields both from the SMGB and deliveries from regional sources. Climate change is exacerbating ongoing problems with groundwater in California, including overdraft, seawater intrusion, land subsidence, and water quality degradation. In particular, increased groundwater pumping to compensate for growing demand and reduced regional surface supplies may increase demand on the SMGB. In addition, groundwater recharge may decrease because of the effects of climate change, including greater evapotranspiration, use of more efficient irrigation systems and changes in rainfall patterns. Potential changes to groundwater quality from climate change could also occur, including increased salt loading because of greater evapotranspiration during irrigation, higher concentrations of inorganic compounds, and potential for seawater if pumping in the SMGB substantially increases.

The City's SWMP takes into account water supply reliability as a result of potential climate changes that might occur during the planning horizons addressed. The SWMP identifies actions for addressing long-term actions to increase water supply and the City's self-sufficiency goals. These include actions to increase the supply of water from brackish (saline) conversion, new water storage facilities, and greater use of recycled water.

4.19.5 Mitigation Measures

Project impacts would be less than significant. No mitigation measures are required.

4.19.6 Level of Significance After Mitigation

No mitigation measures are required; impacts would be less than significant.

4.20 Utilities – Wastewater

4.20.1 Introduction

This section addresses potential impacts on existing wastewater infrastructure (i.e., sewer lines) and treatment facilities, and whether sufficient wastewater conveyance and treatment capacity is available to serve the Project. Existing sewer capacity and flows for the sewer lines serving the Project, and estimated wastewater generation estimates for the Project, are provided in a Sanitary Sewer Study (Sewer Study) prepared for the Project. (KPFF 2018) The Sewer Study is included as Appendix M of this EIR.

4.20.2 Environmental Setting

4.20.2.1 Wastewater Generation

As discussed in depth in Chapter 2, *Project Description*, of this EIR, the Project Site includes nine Phase II development sites within the greater Providence Saint John's Health Center (PSJHC) Campus. There are currently three medical buildings [including the John Wayne Cancer Institute (JWCI), Child and Family Development Center (CFDC), Saint John's Foundation Building (SJF)], two temporary MRI modular buildings, a vacant 10-unit apartment building, and several surface parking lots on the Phase II development sites. The existing wastewater generation associated with these uses is identified in **Table 4.20-1**, *Existing Wastewater Generation*. As indicated therein, a total of 16,380 gallons per day (gpd) of wastewater is currently generated by these uses. The other existing on-site uses (e.g., Mullin Plaza, surface parking lots, and the vacant apartment building parking structure) do not currently generate wastewater.

4.20.2.2 Wastewater Infrastructure

The Project Site is located within the City of Santa Monica, which has an existing municipal system of sewer facilities owned and operated by the City. The existing sewer lines and manholes in the Project vicinity are shown in **Figure 4.20-1**, *Existing Sewer Infrastructure*. As indicated therein, the existing sewer lines in the vicinity include: a 12-inch line in Arizona Avenue extending from 22nd Street to 20th Street; an 18-inch line in Santa Monica Boulevard extending from 23rd Street to 21st Street; a 12-inch line in Santa Monica Boulevard extending from near the entrance to the Hospital to 20th Street; a 12-inch line in Broadway extending from the east to 20th Street; a 12-inch line in 20th Street increasing to a 21-inch line southeast of Santa Monica Boulevard, an 18-inch line in 21st Street between Santa Monica Boulevard and Broadway, an 8-inch line on 23rd Street and 23rd Court between Arizona Avenue and Santa Monica Boulevard; and an 8-inch line in the alley along the east side of the Child and Family Development Center (CFDC) to Santa Monica Boulevard.

As indicated in Table 4.20-1, wastewater from the Project Site is conveyed to the 21st Street and Santa Monica sewer lines by sewer laterals. The wastewater in these and the other sewer lines referenced above flows westward to the 20th Street line, southward to trunk lines, and ultimately to the Hyperion Treatment Plant (HTP) located approximately 6.5 miles to the southwest in Playa del Rey.

TABLE 4.20-1
EXISTING WASTEWATER GENERATION

Development Site	Building Name	Use	Floor Area (sf)	Generation Factor (gpd)[a]	Average Daily Flow (gpd)	Accepting Manhole	Discharge Sewer
S4 and Saint John's Square	John Wayne Cancer Institute (JWCI)	Medical Clinics and Laboratories	40,412	250/ksf	10,103	MH05	18" on 21st St.
		Medical Office	10,643	250/ksf	2,661		
2I	Child and Family Development Center (CFDC)	Office	8,059	120/ksf	967	MH02E	12" on Santa Monica Blvd.
		Day Care & Medical Clinics	74 children	9/child	666		
		Maintenance and Storage (e.g., "Poolhouse")	585	30/ksf	18		
2D/E	Saint John's Foundation Building (SJF)	Office	10,800	120/ksf	1,296	MH05	18" on Santa Monica Blvd.
S1/S3	MRI Building	Medical	2,675	250/ksf	669		18" on 21st St.
S4 and Saint John's Square	10-unit Apartment Building (VACANT)	Residential - Apartment	10,270	--	0		
Total					**16,380**	--	--

Acronyms: sf = square feet, GPD = gallons per day, kdf = 1,000 sf.

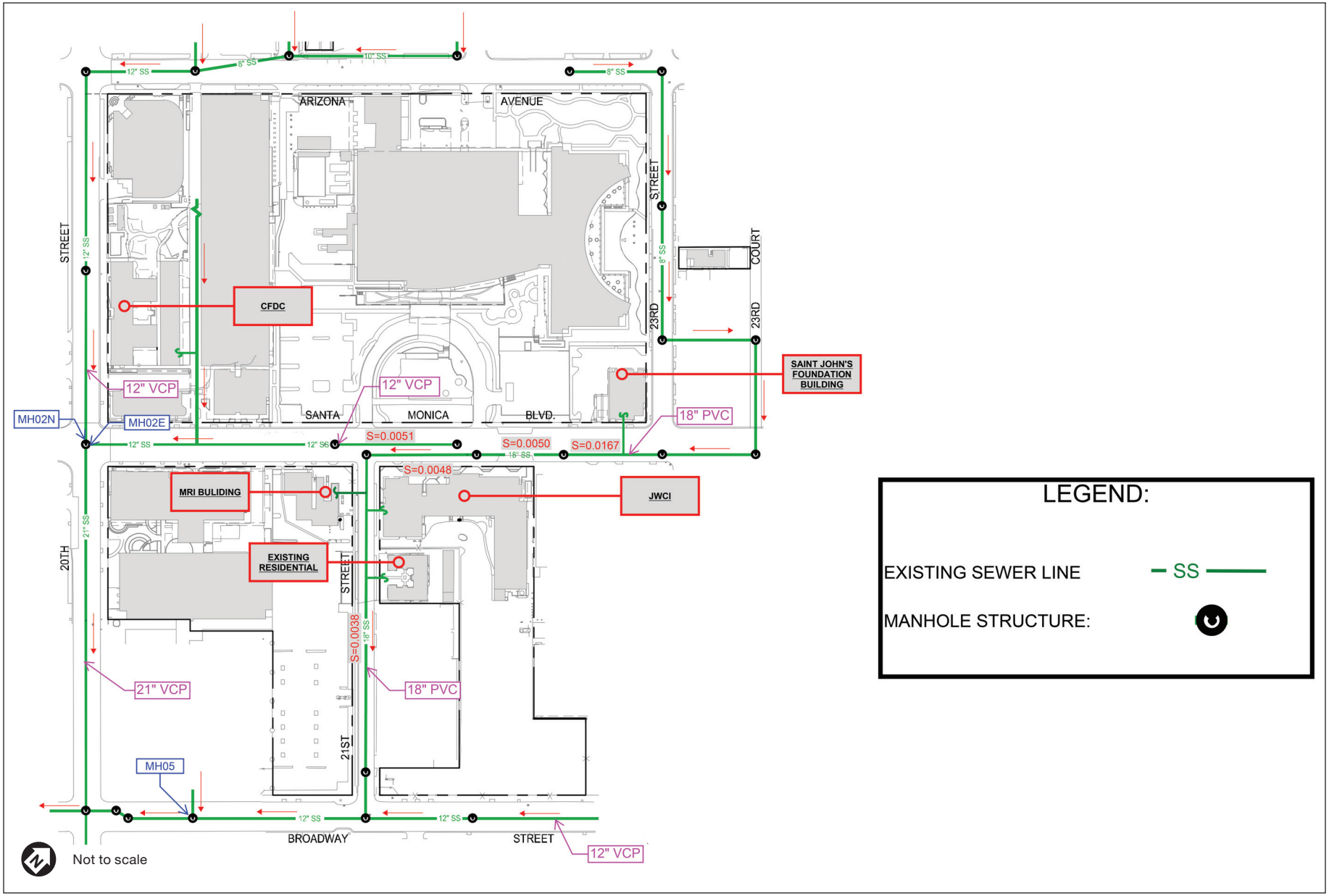
[a] Generation factors from City of Los Angeles Sewage Facilities Charge Guide, Residential and Commercial Categories, April 6, 2012. Included in Appendix B of the Sewer Study.

SOURCE: KPFF Consulting Engineers, Sanitary Sewer Study – Providence Saint John's Health Center Phase II Project, April 2019.

Sewer pipes have a flow capacity based on the diameter of the pipe and the slope of the pipeline. To ensure the adequacy of sewer line capacity to serve existing and proposed development, the City reviews sewer lines based on specific sewer design and operations criteria. Per this criteria, sewers should be sized so the depth of the Peak Dry Weather Flow (PDWF) projected for the design period, with PDWF no more than 50 percent of the pipe diameter for sewer lines less than 15 inches. (KPFF 2018)

Flow monitoring of nine public sewer manholes adjacent to the Project Site was conducted for the sewer capacity analysis in the Sewer Study. After a review of the data collected and analysis of the Project demands, two out of the nine manholes, MH02 and MH05, were further investigated to determine if the existing sewer system would have adequate capacity to serve the Project. ADS monitored MH02 from the north and east and labeled them as MH02N and MH02E which correspond to the 12-inch line in 20th Street and the 12-inch line in Santa Monica Boulevard, respectively. MH05 corresponds to the 12-inch line in Broadway. The existing design capacity and flow monitoring results for these sewer lines are identified in **Table 4.20-2**, *Existing Sewer Line Capacity and Flow Monitoring Results*. As indicated therein, the percent full capacity recorded at MH02N, MH02E and MH05 is 35.1 percent, 47.9-71.5 percent[1], and 41.3 percent respectively, as compared to the City's flow capacity criterion for 12-inch sewer lines of no more than 50 percent.

[1] The existing depth and flow in this row are the recorded maximum flows that are within the ADS flow monitoring report. However, they are potential outliers and may not be representative of the actual max flows. This event occurred on May 3rd, 2017, just before 3 pm for less than 30 min. It was the only event of its kind to occur during the 14-day monitoring period.



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SOURCE: KPFF Consulting Engineers, Sanitary Sewer Study – Providence Stain John's Health Center Phase II Project, August 2018

Providence Saint John's Health Center Phase II Project

Figure 4.20-1
Existing Sewer Infrastructure

ESA

TABLE 4.20-2
EXISTING SEWER LINE CAPACITY AND FLOW MONITORING RESULTS

Sewer Line	Manhole	Design Capacity (mgd)	Peak Sewage Flow (mgd)	Average Depth (in)	Maximum Depth (in)	Percent Full
20th St. 12" Sewer Line	MH02N	2.327	0.826	2.75	4.21	35.1%
Santa Monica Blvd 12" Sewer Line	MH02E	1.693	1.039	2.84	8.58	47.9%-71.5%[a]
Broadway 12" Sewer Line	MH05	1.670	0.997	2.20	4.95	41.3%

Acronyms: mgd = million gallons per day; in = inches.

[a] The existing depth and flow in this row are the recorded maximum flows that are within the ADS flow monitoring report. However, they are potential outliers and may not be representative of the actual max flows. This event occurred on May 3rd, 2017, just before 3 pm for less than 30 min. It was the only event of its kind to occur during the 14-day monitoring period.

SOURCE: ESA, March 2018. Based on information from KPFF Consulting Engineers, Sanitary Sewer Study – Providence Saint John's Health Center Phase II Project, April 2019.

4.20.2.3 Wastewater Treatment

Wastewater from the City is collected through the City's sewer system and treated at the Hyperion Treatment Plant (HTP) in Playa del Rey. The HTP is one plant within the Hyperion Treatment Conveyance System (HTCS) that is owned and operated by the City Los Angeles Department of Public Works (LADPW). With a treatment capacity of 450 mgd and an average dry water flow of approximately 275 mgd, approximately 175 mgd of remaining treatment capacity is available at the HTP (City of Los Angeles Department of Public Works, 2018).

Following secondary treatment, the majority of effluent from the HTP is discharged into Santa Monica Bay. The remaining treated effluent is conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reuse as reclaimed water.

The HTP has two outfalls that discharge into Santa Monica Bay (a one-mile outfall pipeline and five-mile outfall pipeline). Both outfalls are 12 feet in diameter. The one-mile outfall pipeline is 50 feet deep and is only used on an emergency basis or when repairs are being completed on the five-mile outfall. The five-mile outfall pipeline is 187 feet deep and is used to discharge secondary treated effluent on a daily basis. HTP effluent is required to meet the Los Angeles Regional Water Quality Control Board's (LARWQCB) requirements for a recreational beneficial use, which imposes performance standards on water quality that are more stringent than the standards required under the Clean Water Act permit administered under the system's National Pollution Discharge Elimination System (NPDES) permit. Accordingly, the discharged of treated effluent from the HTP to Santa Monica Bay is continually monitored by the City of Los Angeles Environmental Monitoring Division (EMD) to ensure that it meets or exceeds prescribed standards. The Los Angeles County Department of Health Services also monitors flows into Santa Monica Bay.

Planning for future services at the HTP is carried out under the auspices of the adopted City of Los Angeles One Water LA 2040 Plan, completed in April 2018. The One Water LA 2040 Plan (Plan) takes a holistic and collaborative approach to consider all of the City's water resources from surface water, groundwater, potable water, wastewater, recycled water, dryweather runoff, and stormwater as "One Water." Volume 2 of the One Water LA 2040 Plan comprises the Wastewater Facilities Plan.

4.20.3 Regulatory Framework

4.20.3.1 Federal

Federal Water Pollution Control Act (Clean Water Act)

The Water Pollution Control Act, or Clean Water Act (CWA), is a comprehensive statute aimed at restoring and maintaining the chemical, physical, and biological integrity of the nation's waters, including discharge waters of wastewater treatment processes. In combination with the Clean Water Act, other federal environmental laws also regulate the location, type, planning, and funding of wastewater treatment facilities.

National Pollutant Discharge Elimination System (NPDES)

As authorized by the Clean Water Act, the NPDES permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. The NPDES permit system is authorized and implemented by states and local water boards.

4.20.3.2 State

Operation of the HTP is subject to regulations set forth by the California Department of Public Health (CDPH) and the State Water Resources Control Board (SWRCB) in compliance with the Clean Water Act and NPDES permits.

4.20.3.3 City of Santa Monica

Santa Monica Municipal Code

The Santa Monica Municipal Code includes several provisions regarding the provision of sewer services. Notably, Section 7.08.050, Sewer allocation permit, requires, in part, that applications for a sewer allocation permit shall be issued only if the Director determines that the City sewer system has sufficient capacity to accommodate the net increase in wastewater created by a project. Sections 7.04.460 and 7.04.490 require the payment of capital facility fees to the City covering the estimated reasonable cost of providing system capacity to new development, and permit review by the City as part of the permitting process.

4.20.4 Environmental Impacts

4.20.4.1 Thresholds of Significance

Appendix G of the State CEQA Guidelines provides questions that address potential impacts related to wastewater. The CEQA guidelines provides that lead agencies may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects, and the use of Appendix G as a significance threshold is routinely sanctioned by the courts (although such use is not mandatory). These questions are listed below and are used as the significance thresholds by the City in this section.

Would the Project:

a) Require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which would cause significant environmental effects.

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

4.20.4.2 Methodology

Per direction from the City of Santa Monica Public Works Department, the wastewater generation for the Project was estimated using the City of Los Angeles 2012 Sewage Facilities Charge Sewage Generator Factors for Residential and Commercial Categories table (included in Appendix B of the Sewer Study). Because some of the uses vested by the Development Agreement allow for a range of activities with varying sewage generation factors, two sewage generation scenarios were developed (discussed further under Project Characteristics below).

For the assessment of wastewater treatment capacity and whether new or relocated treatment facilities are required, the existing remaining available capacity of the HTP, as identified on LA Sanitation's website (LADWP 2018) was compared against the net increase in wastewater associated with the Project.

For the assessment of sewer conveyance capacity and whether new or relocated sewer conveyance facilities are required, sewer pipes have a flow capacity based on the diameter of the pipe and the slope of the pipeline. To ensure the adequacy of sewer line capacity to serve existing and proposed development, the City Public Works Department reviews sewer lines based on specific sewer design and operations criteria. Per this criteria, sewers should be sized so the depth of the PDWF projected for the design period, with PDWF no more than 50 percent of the pipe diameter for sewer lines less than 15 inches. (KPFF 2018). To analyze the Project's impacts on sewer lines, the existing flows in the sewer lines that would serve the Project (depth, velocity, and quantified flows) were measured via flow monitoring, and it was determined whether the City's capacity criteria for these lines would be exceeded with the addition of the net estimated increase in wastewater associated with the Project. The detailed calculations that went into the sewer line capacity analysis, and the flow monitoring data, are included in Appendices C and D, respectively, of the Sewer Study.

The analysis in this section based on the City of Santa Monica dry weather design criteria which states that the depth-to-diameter ratio (d/D) for a 12-inch pipe cannot be greater than 0.5. The City will corroborate this analysis with a wet-weather analysis using their hydraulic model of the City sewer network and using a wet weather design criteria as outlined on page 5 of Sewer Study.

4.20.4.3 Project Characteristics

Project Wastewater Generation

The Project would demolish the existing medical research/laboratory, medical office, day care, office and vacant residential apartment uses located on the Project Site, and develop new hospital/health care, medical research, medical office, neighborhood commercial, restaurant, day care, and multifamily residential uses in their place.

Because some of the uses proposed by the Project allow for a range of activities with varying sewage generation factors, two wastewater generation scenarios are evaluated as set forth in **Table 4.20-3**, *Project Wastewater Generation – Scenario 1*, and **Table 4.20-4**, *Project Wastewater Generation – Scenario 2*. The most significant difference between these scenarios pertains to the hospital/health care uses within Buildings 2C and 2D/E. Table 4.20-2 assumes that Buildings 2C and 2D/E are both inpatient facilities with ground floor commercial uses, while Table 4.20-3 assumes that Buildings 2C and 2D/E are ambulatory/outpatient facilities). As indicated therein, Scenarios 1 and 2 would generate net increases in wastewater flow of 108,881 gpd and 154,158 gpd, respectively. See the Sewer Study for additional information on the assumptions for each development scenario.

As discussed in detail in Section 4.19, *Water Supply*, of this EIR, the Project would include a number of water conservation features including, but not limited to, the use of water efficient fixtures and appliances, pursuant to the City's Green Building Code and Water Efficiency Requirements. These water conservation measures would reduce the amount of wastewater generated by the Project. Therefore, the wastewater generation estimates for the Project in Tables 4.20-3 and 4.20-4 are conservative.

Proposed Infrastructure Improvements

The proposed sewer infrastructure improvements are shown in **Figure 4.20-2**, *Proposed Sewer Infrastructure*.

As part of the S3 development, the northern portion of the existing 18-inch sewer in 21st Street (portion of 21st Street that would be vacated) would be removed. As part of the S3 development, a new sewer line is proposed in the proposed 20th Place/South Campus West Driveway running from Broadway to Santa Monica Boulevard (to accept the flow from Building S1 and S3). This work would take place during the construction of 20th Place and South Campus West Driveway and would be completed prior to issuance of the Certificate of Occupancy for the S1 building or S3 building, whichever is earlier. Additionally, there would be new sewer laterals that connect the proposed buildings to the existing public sewers.

TABLE 4.20-3
PROJECT WASTEWATER GENERATION – SCENARIO 1

Dev. Site & Bldg./Parking	Floor Area/ # of Dwelling Units	Units	Use	Generation Factor[a]	Average Daily Gross Flow (GPD)	Accepting Manhole	Discharge Sewer
2C - Building	80	beds	Hospital	70/bed	5,600.00	MH02E	12” on Santa Monica Blvd.
2C - Building	5,500	sf	Commercial Use	50/ksf	275.00	MH02E	
2C- Parking	118,265	sf	Auto Parking	20/ksf	2,365.30	MH02E	
Mullin Café	1,500	sf	Restaurant	300/ksf	450.00	MH02E	
SJ Café	900	sf	Restaurant	300/ksf	270.00	MH02E	
					Total to MH02E (gpd)		**8,960**
2I - Building	50,000	sf	Medical Office/ Clinic	250/ksf	12,500.00	MH02N	12” on 20th St.
2I - Building	4,500	sf	Commercial Use	50/ksf	225.00	MH02N	
2I - Parking	137,828	sf	Auto Parking	20/ksf	2,756.56	MH02N	
					Total to MH02N (gpd)		**15,482**
2D/E - Building	36	beds	Hospital	70/bed	2,520.00	MH05	18” on Santa Monica Blvd.
2D/E - Building	3,000	sf	Commercial Use	50/ksf	150.00	MH05	
2D/E - Parking	115,729	sf	Auto Parking	20/ksf	2,314.58	MH05	
S1- Building	25,500	sf	Counseling Center	120/ksf	3,060.00	MH05	Relocated line in 20th Pl.
S1- Building	73	person	School: Nursery Day Care	9/person	657.00	MH05	
S1/S3- Parking	303,973	sf	Auto Parking	20/ksf	6,079.46	MH05	
S2 - Building	10	units	Residential: Apt. - 2 Bedroom	150/du	1,500.00	MH05	12” on Broadway
S2- Building	800	sf	Commercial Use	50/ksf	40.00	MH05	
S2 - Parking	23,987	sf	Auto Parking	20/ksf	479.74	MH05	
S3 - Building	58,000	sf	Medical: Lab in Hospital	250/ksf	14,500.00	MH05	Relocated line in 20th Pl.
S3 - Building	65,000	sf	Medical Office/ Clinic	250/ksf	16,250.00	MH05	
S4 - Building	250	seats	Auditorium	3/seat	750.00	MH05	18” on Santa Monica Blvd.
S4 - Building	133,300	sf	Medical Office/ Clinic	250/ksf	33,325.00	MH05	
S4 - Building	3,350	sf	Restaurant	300/ksf	1,005.00	MH05	
S4 - Building	3,350	sf	Commercial Use	50/ksf	167.50	MH05	
S4 - Building	50,350	sf	Office	120/ksf	6,042.00	MH05	
S4/S5 - Parking	462,429	sf	Auto Parking	20/ksf	9,248.58	MH05	
S5 - Building	4	units	Residential: Apt - 1 Bed/2Ba	150/du	600.00	MH05	12” on Broadway
S5 - Building	18	units	Residential: 1 Bed no kitchen	45/du	810.00	MH05	
S5 - Building	12	units	Residential: Apt - 1 Bed/1Ba	110/du	1,320.00	MH05	
					Total to MH05 (gpd)		**100,819**
					Grand Total - Gross (gpd)		**125,261**
					Existing		**16,380**
					Grand Total - Net (gpd)		**108,881**

Acronyms: gpd = gallons per day, sf = square feet, ksf = thousand square feet, du = dwelling unit, MH = manhole
[a] Generation factors from City of Los Angeles Sewage Facilities Charge Guide, Residential and Commercial Categories, April 6, 2012. Included in Appendix B of the Sewer Study.
SOURCE: KPFF Consulting Engineers, Sanitary Sewer Study – Providence Saint John’s Health Center Phase II Project, April 2019.

TABLE 4.20-4
PROJECT WASTEWATER GENERATION – SCENARIO 2

Dev. Site & Bldg./Parking	Floor Area/ # of Dwelling Units	Units	Use	Generation Factor	Average Daily Flow (GPD)	Accepting Manhole	Discharge Sewer
2C - Building	117,500	sf	Medical Office/ Clinic	250/ksf	29,375.00	MH02E	12” on Santa Monica Blvd.
2C- Parking	118,265	sf	Auto Parking	20/ksf	2,365.30	MH02E	
Mullin Café	1,500	sf	Restaurant	300/ksf	450.00	MH02E	
SJ Café	900	sf	Restaurant	300/ksf	270.00	MH02E	
					Total to MH02E (gpd)		**32,460**
2I - Building	50,000	sf	Medical Office/ Clinic	250/ksf	12,500.00	MH02N	12” on 20th St.
2I - Building	4,500	sf	Commercial Use	50/ksf	225.00	MH02N	
2I - Parking	137,828	sf	Auto Parking	20/ksf	2,756.56	MH02N	
					Total to MH02N (gpd)		**15,482**
2D/E - Building	78,500	sf	Medical Office/ Clinic	250/ksf	19,625.00	MH05	18” on Santa Monica Blvd.
2D/E - Parking	115,729	sf	Auto Parking	20/ksf	2,314.58	MH05	Relocated line on 20th Pl.
S1- Building	25,500	sf	Counseling Center	120/ksf	3,060.00	MH05	
S1- Building	73	person	School: Nursery Day Care	9/person	657.00	MH05	
S1/S3- Parking	303,973	sf	Auto Parking	20/ksf	6,079.46	MH05	
S2 - Building	10	units	Residential: Apt. - 2 Bedroom	150/du	1,500.00	MH05	12” on Broadway
S2- Building	800	sf	Commercial Use	50/ksf	40.00	MH05	
S2 - Parking	23,987	sf	Auto Parking	20/ksf	479.74	MH05	
S3 - Building	58,000	sf	Medical: Lab in Hospital	250/ksf	14,500.00	MH05	Relocated line on 20th Pl.
S3 - Building	65,000	sf	Medical Office/ Clinic	250/ksf	16,250.00	MH05	
S4 - Building	250	seats	Auditorium	3/seat	750.00	MH05	18” on Santa Monica Blvd.
S4 - Building	155,000	sf	Medical Office/ Clinic	250/ksf	38,750.00	MH05	
S4 - Building	35,350	sf	Office	120/ksf	4,242.00	MH05	
S4/S5 - Parking	462,429	sf	Auto Parking	20/ksf	9,248.58	MH05	12” on Broadway
S5 - Building	34	units	Residential: Apt - 1 Bed/2Ba	150/du	5,100.00	MH05	
					Total to MH05 (gpd)		**122,596**
					Grand Total - Gross (gpd)		**170,538**
					Existing		**16,380**
					Grand Total - Net (gpd)		**154,158**

Acronyms: gpd = gallons per day, sf = square feet, ksf = thousand square feet, du = dwelling unit, MH = manhole

[a] Generation factors from City of Los Angeles Sewage Facilities Charge Guide, Residential and Commercial Categories, April 6, 2012. Included in Appendix B of the Sewer Study.
Source: KPFF Consulting Engineers, Sanitary Sewer Study – Providence Saint John’s Health Center Phase II Project, April 2019.

SEWER SERVICE

LEGEND:

EXISTING SEWER LINE — SS

PROPOSED RELOCATION OF SEWER LINE: — SS

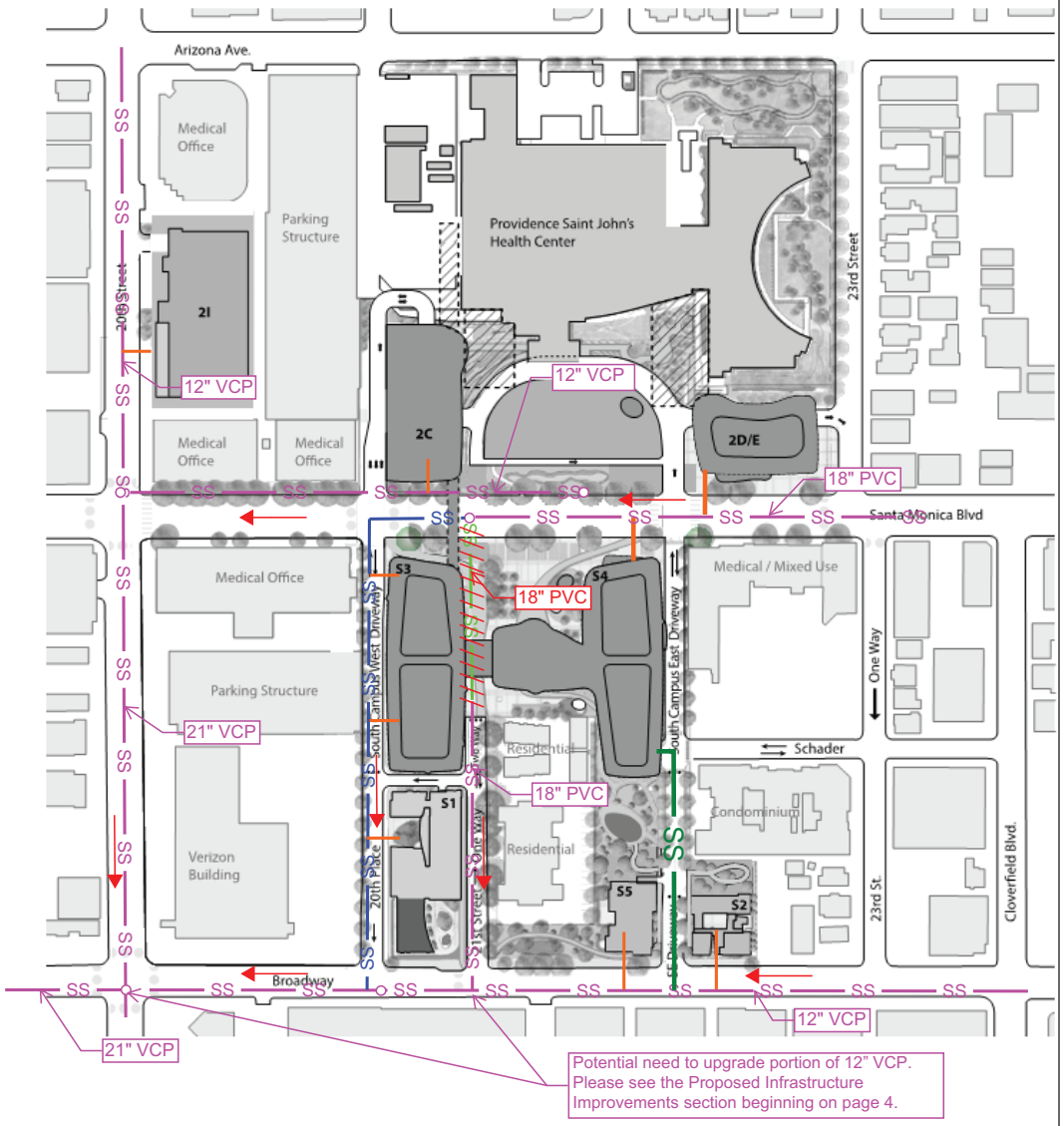
POSSIBLE LATERAL LOCATIONS:

SEWER LINE TO BE REMOVED: SS

POSSIBLE S4 ROUTING: — SS

NOTE: LOCATION OF EXISTING AND PROPOSED SERVICES ARE APPROXIMATE LOCATIONS AND ARE SCHEMATIC. PLEASE CONSULT ASBUILTS AND SURVEY FOR MORE ACCURATE LOCATION.

The project consists of the removal of the existing 18" PVC sewer line in the north half of 21st Street to accommodate for the proposed subterranean parking of Building S4 . The line will be capped at the extent of the removal. To accept the flow from Building S1 and S3 a new sewer line is proposed in the proposed 20th Place and South Campus West Driveway. The line will connect to an existing Manhole in Santa Monica Blvd, run West along Santa Monica Blvd and turn south along the proposed 20th Place to connect to an existing 12" VCP in Broadway Avenue. The proposed line is essentially parallel to the existing 18" PVC line in 21st Street. It is believed that if the existing 18" PVC flows adequately that the proposed adjacent parallel line in 20th Place should do the same. During design, it may become infeasible to route the sewage from the south most portion of Building S4 to the North to connect to the existing sewer line in Santa Monica Blvd. If this becomes the case, a sewer line is proposed to run from the south of S4, along SE Driveway and connect into the existing sewer main in Broadway. Prior to the issuance of a building permit for Buildings S3, S4, and 2C, additional sewer monitoring will be required to determine whether additional upgrades are needed. Please see the Proposed Infrastructure Improvements section beginning on page 4.



Not to scale

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SOURCE: KPFF Consulting Engineers, Sanitary Sewer Study – Providence Saint John's Health Center Phase II Project, April 16, 2019

Providence Saint John's Health Center Phase II Project

Figure 4.20-2
Proposed Sewer Infrastructure

ESA

Potential Additional Upgrades Related to Building S3 or S4

Prior to the issuance of a development review permit for the earlier of the S3 building or the S4 building, Saint John's would prepare an updated sewer study to be reviewed and approved by the City. Such study would determine if future project flows (during dry and wet weather conditions) would cause the City's 12-inch and 21-inch sewer lines on Broadway to exceed the hydraulic planning criteria on page 47 in the City's 2017 Sanitary Sewer System Master Plan (identified in the Sewer Study) or its successor to. If the study (as approved by the City) determines that there will be exceedances of the hydraulic planning criteria due to project flows, Saint John's would perform sewer upgrades prior to issuance of a Certificate of Occupancy for the earlier of the S3 or S4 building. The primary criteria used to establish adequately-sized sewer piping is if the Peak Wet Weather Flow (PWWF) depth to diameter ratio is less than 0.75 and the minimum velocity is 2 ft/s.

Necessary sewer upgrades may include, but are not limited to:

(a) Installing a new adequately-sized sewer line(s) along Broadway and 20th Street to convey sewer flows generated by S3 (and S4, if applicable) to the Colorado Avenue 24-inch Vylon sewer line; or

(b) Upsizing the existing 12-inch sewer on Broadway to 18-inch from 21st Street to 20th Street and re-activating and placing in service the existing 12-inch VCP line (currently abandoned) along 20th Street from Broadway to Colorado Avenue to divert sewer flows from the Broadway 21-inch VCP sewer line to the Colorado Avenue 21-inch Vylon sewer line.

Potential Additional Upgrades Related to Building S4

The S4 building is proposed to connect to the existing 18-inch sewer on Santa Monica Boulevard; however, during the design phase it may be determined that it is infeasible to route the sewage from the southern portion of Building S4 to the north to connect to the existing sewer line in Santa Monica Boulevard. In this case, prior to issuance of Certificate of Occupancy for Site S4, a new adequately-sized sewer line would be constructed and run south from Building S4 to Broadway along the South Campus East Driveway and South East Driveway. The adequately-sized sewer line shall be sized to ensure the line would not exceed the hydraulic planning criteria on page 47 in the City's 2017 Sanitary Sewer System Master Plan (shown above). The primary criteria used to establish adequately-sized sewer piping is if the PWWF depth to diameter ratio is less than 0.75, and if the minimum velocity is 2 ft/s.

The City, based on its review of this preliminary sewer study, has indicated that, additional sewer upgrades may be necessary and may include, but are not limited to:

(a) If not already completed as part of the S3 development, installing a new adequately-sized sewer line(s) along Broadway and 20th Street to convey sewer flows generated by S4 to the Colorado Avenue 24-inch Vylon sewer line (if Saint John's sewer discharge to Broadway from Site S4 to a maximum of 21,200 GPD, the extent of any upgrades may be reduced or eliminated); or

(b) If not already completed as part of the S3 development, upsizing the existing 12-inch sewer on Broadway to 18-inch from 21st Street to 20th Street, restricting sewer discharge to Broadway from Site S4 to a maximum of 21,200 GPD, and re-activating and placing in

service the existing 12-inch VCP line (currently abandoned) along 20th Street from Broadway to Colorado Avenue to divert sewer flows from the Broadway 21-inch VCP sewer line to the Colorado Avenue 21-inch Vylon sewer line.

Upgrades shall be performed to the satisfaction of the City's Water Resources Engineer prior to issuance of a Certificate of Occupancy for the S4 building, whichever is earlier.

Potential Additional Upgrades Related to Building 2C

Prior to the issuance of development review permit for the 2C building, additional sewer monitoring would be required to determine if future project flows (during dry and wet weather conditions) would cause the City's 12-inch line on Santa Monica Boulevard to exceed the hydraulic planning criteria on page 47 in the City's 2017 Sanitary Sewer Master Plan (included above). The primary criteria used to establish adequately-sized sewer piping is if the PWWF depth to diameter ratio is less than 0.75, and if the minimum velocity is 2 ft/s.

The City, based on its review of this preliminary sewer study, has indicated that additional sewer upgrades may be necessary and may include, but are not limited to:

(a) Upsizing the existing 12-inch sewer line on Santa Monica Boulevard from the 2C connection to 20th Street.

(b) Upsizing the existing 21-inch sewer line along 20th Street, from Santa Monica Boulevard to Broadway.

Upgrades shall be performed to the satisfaction of the City's Water Resources Engineer prior to issuance of a Certificate of Occupancy for the 2C building.

Sewer Improvement Phasing

The proposed development of Saint John's Health Center would be constructed in multiple phases. The baseline original phasing scenario (e.g., Phasing Scenario A) would be constructing Buildings S1, S2 and S3 first and constructing the balance of the buildings in subsequent phases. A second phasing scenario (e.g., Phasing Scenario B) would be constructing Buildings 2C and S2 first and constructing the balance of the buildings in subsequent phases.

4.20.4.4 Project Impacts

Expansion of Wastewater Treatment Facilities

Impact WW-1: *Would the project require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects?*

Impact Statement WW-1: The Project would generate additional wastewater that would be conveyed to nearby mainline sewers and the HTP for treatment. The Project would not require the relocation or construction of new or expanded wastewater treatment facilities. The Project would require the relocation or construction of new wastewater conveyance infrastructure. However, the relocation or construction of this infrastructure would not cause significant environmental effects. Therefore, impacts would be less than significant.

Wastewater Treatment Facilities

Wastewater flows from the City are treated at the HTP, which has a dry weather capacity of approximately 450 mgd processed through full secondary treatment and an 800 mgd wet weather capacity. Currently the HTP receives and treats an average of approximately 275 mgd of wastewater, approximately 5.3 percent of which is wastewater from the City. The residual capacity available is 175 mgd. The net increase of 108,881 gpd under Project Wastewater Generation Scenario 1, or 154,158 gpd under Project Wastewater Generation Scenario 2, would amount to approximately 0.06 percent and 0.09 percent, respectively, of the remaining available capacity of the HTP, which would represent a minimal increase in the demand for capacity. Furthermore, the HTP currently meets applicable water quality standards as set forth by the NPDES, and per the discussion under Impact WW-1 above, would be expected to continue to do so under the Project. Therefore, the HTP would have sufficient treatment capacity to serve the Project along with the service provider's existing commitments, and no new or expanded wastewater treatment facilities that could lead to significant environmental effects would occur. Hence, the impact would be less than significant.

Wastewater Conveyance Facilities - Phasing Scenario A

Table 4.20-5, *Sewer Capacity Depth – Existing vs. Proposed – Phasing Scenario A*, compares the existing and Project's wastewater flows in the sewer lines that would serve the Project under each of the wastewater generation options under Phasing Scenario A. Supporting calculations are included in Appendix C of the Sewer Study.

Under Phasing Scenario A, wastewater flow from Building 2I would discharge into the existing 12-inch 20th Street sewer line. With the additional flow from 2I, this line (at MH02N) is projected to flow at approximately 42.1 percent full under both Project wastewater generation scenarios. This would be below the City's design criterion for 12-inch sewer lines of 50 percent of full capacity.

Wastewater flow from Buildings 2C, Mullin Plaza, and SJ Cafe would discharge into the existing 12-inch Santa Monica Boulevard sewer line. This line currently carries flow from the Child and Family Development Center which would be demolished. With the additional flow and depth from 2C, Mullin Plaza, and SJ Cafe, as well as the removed flow from the aforementioned demolished buildings, this sewer line (at MH02E) is projected to flow at 76.5 percent full under Scenario 1 and 80.5 percent full under Scenario 2. However, ADS has confirmed that during the 14-day monitoring period of the 12-inch Santa Monica Boulevard line (MH02E), there was a spike in both the velocity and depth data. This event data is reflected as the recorded existing maximum depth and flow for MH02E. However, if this event is an outlier, the more representative existing max depth and flow are approximately 5.75 inches and 0.39 mgd. In the case that the event on May 3rd is indeed an outlier, the existing pipe would flow at 52.9 percent full under Scenario 1 and 56.9 percent full under Scenario 2. These results indicate that the 12-inch Santa Monica sewer line may need to be upsized; however, additional monitoring prior to the issuance of a building permit for Site 2C would be required to confirm.

Wastewater flow from Building 2D/E and S4 would discharge into the existing 18-inch line in Santa Monica Boulevard. This line would be adequate to accommodate the increase in flows from the building. The existing 18-inch line in Santa Monica Boulevard would connect to and carry

sewer flows westward to the new relocated sewer line to be installed within 20th Place/South Campus West Driveway. The relocated line would carry flows south from Buildings S3 and S1, then turn south to connect to the line in Broadway.

Wastewater flow from Buildings S2 and S5 would discharge into that segment of the existing 12-inch Broadway sewer line (e.g., the portion of the line east of 21st Street) that is not proposed to be upgraded to 18-inches (e.g., the portion of the line from 21st Street to 20th Street). This 12-inch line is anticipated to be adequate to accommodate flows from these two developments (and potentially, from up to 40 percent of S4 if it is determined that sewage from the southernmost portion of Building S4 cannot be routed to the north).

The Broadway sewer line would carry all wastewater flows from Buildings 2D/E, S1, S2, S3, S4 and S5. Currently, the line is an existing 12-inch line that carries flow from the John Wayne Cancer Institute, the Saint John's Foundation building, an MRI Building, and an Existing Residential Building, which would be demolished. Under the Project, this line is projected to flow at 56.3 percent full under Scenario 1 and 58.3 percent full under Scenario 2 which would exceed the City's design criterion for 12-inch sewer lines of 50 percent of full capacity. Therefore, to address this exceedance, the Project would upsize the line to a new 18-inch line within the segment of Broadway from 21st Street to 20th Street. This upsized line would be required prior to issuances of the Certificates of Occupancy for S1 and S3, but not prior to the issuance of the Certificate of Occupancy for S2 as the sewer flow from S2 would be minimal.

Based on the above, adequate wastewater conveyance capacity would be available in the existing 20th Street sewer line, and in the Broadway sewer line with the proposed upsizing (between 21st Street and 20th Street), to serve the Project under both wastewater generation scenarios. However, sufficient capacity to serve the Project (specifically, Building 2C) may not be available in the Santa Monica sewer line or downstream of the development along Broadway Street. If such is the case, the impact would be significant and implementation of Mitigation Measure WW-1 requiring off-site water conveyance infrastructure improvements would be required.

The analysis of the environmental effects associated with constructing the Project's necessary wastewater infrastructure improvements is already subsumed in the impact analysis for the proposed Project in other sections of this EIR (e.g., Sections 4.2, *Air Quality*; 4.5, *Archaeological/Paleontological Resources*; 4.13, *Noise and Vibration*; 4.17, *Transportation*, etc.). The construction of the required off-site wastewater infrastructure could potentially temporarily interfere with traffic and circulation and generate some temporary noise during the construction period. However, implementation of the proposed Construction Management Plan (PDF-TR-1) would avoid any substantial disruption of traffic, bicycle and pedestrian circulation, and because any construction noise would be temporary, would occur within the rights-of-way of the existing streets within a largely commercial area, and would be required to comply with all applicable regulations (including the prohibition of nighttime construction activities), any associated construction noise would not exceed applicable noise thresholds at noise-sensitive uses. Therefore, the Project under Phasing Scenario A would not require or result in the relocation or construction of new wastewater conveyance facilities, the construction of which would cause significant environmental effects. Impacts would be less than significant.

Wastewater Conveyance Facilities - Phasing Scenario B

Table 4.20-6, *Sewer Capacity Depth – Existing vs. Proposed – Phasing Scenario B*, compares the existing and Project's wastewater flows in the sewer lines that would serve the Project under each of the wastewater generations options under Phasing Scenario B. Supporting calculations are included in Appendix C of the Sewer Study.

As shown in Table 4.20-6, since no existing buildings would be demolished during the first phase of construction, the pipe along Santa Monica Blvd would be 76.5% full in Option 1 and 80.5% full in Option 2 if the recorded spike at manhole 2E is considered or 52.9% full in Option 1 and 56.9% full in Option 2 if the spike is not considered. This sewer demand would continue until the existing buildings are demolished as part of Phasing Scenario B; this scenario would remove existing demand from the sewer, but the demand would not be significant enough to affect the level in the sewer. Like under Phasing Option A, implementation of Mitigation Measure WW-1 could potentially be required to provide the sewer capacity required to serve the Project under Phasing Scenario B. However, for the same reasons discussed under Phasing Scenario A above, the Project under Phasing Scenario B would not require or result in the relocation or construction of new wastewater conveyance facilities, the construction of which would cause significant environmental effects. Therefore, impacts would be less than significant.

Wastewater Treatment Facilities Capacity

Impact WW-2: Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact Statement WW-2: The Project would generate additional wastewater that would ultimately be conveyed to the HTP for treatment. The HTP has capacity to serve the Project in addition to the provider's existing commitments. Thus, impacts would be less than significant.

As noted above, wastewater flows from the City are treated at the HTP, which has a dry weather capacity of approximately 450 mgd, currently receives and treats an average of approximately 275 mgd, and has a residual capacity available is 175 mgd. The net increase of 108,881 gpd under Project Wastewater Generation Scenario 1, or 154,158 gpd under Project Wastewater Generation Scenario 2, would amount to approximately 0.06 percent and 0.09 percent, respectively, of the remaining available capacity of the HTP, which would represent a minimal increase in the demand for capacity. Therefore, the HTP would have sufficient treatment capacity to serve the Project along with the service provider's existing commitments, or expansion of the HTP would be required, and thus no environmental effects associated with expansion would occur. Hence, the impact would be less than significant.

4.20.4.5 Cumulative Impacts

Wastewater Treatment Capacity

The Project and other new development occurring within the City, including the 112 of the 131 cumulative projects in the City, would generate increased cumulative wastewater requiring treatment at the HTP. However, all City development would be subject to the Santa Monica

Municipal Code regulations that require the collection of fees and availability of treatment capacity for new connections to the sewer system.

The City contributes a small increment of wastewater to the regional wastewater discharges conveyed and treated at the HTP. The current treatment capacity of the HTP is 450 mgd at HTP. Monitoring of wastewater flows and identification of the needs for future treatment capacity for all of the development in the entire service area is an on-going activity of LADWP. Such monitoring evaluates long term needs based upon updated demographic projections by SCAG.

The City of Los Angeles completed the One Water LA Plan that extends the planning horizon of the 2006 IRP from 2020 to 2040. This plans considers changes needed to update the IRP in light of changes to growth projections, regulations and emerging technologies. The One Water LA Plan provides for continued availability of wastewater treatment capacity at HTP and other treatment plants in future years. Therefore, the regional system is expected to be able to accommodate the wastewater generation from cumulative development occurring throughout the region, inclusive of the wastewater from the City for a longer term than that addressed in the IRP. The cumulative impacts of the Project and other cumulative development within the service area would not require the provision of new or expanded wastewater treatment facilities other than that provided in existing plans and programs for the provision of future services. Therefore, cumulative impacts related to wastewater treatment capacity would be less than significant.

Wastewater Conveyance Capacity

There are two approved cumulative projects near the Project area, specifically to the east of the new S2 building: 2225 Broadway (Cumulative Project No. 34, 15 units) and 1450 Cloverfield (Cumulative Project No. 35, 34 units). Both projects will likely need new connections for sewer service. As part of the 2017 Sanitary Sewer System Master Plan (SSSMP), a sewer model was developed to evaluate the capacity of the City's existing sanitary sewer system under current conditions and plan for the capacity required by future conditions associated with anticipated future growth in the City, including the Land Use and Circulation Element (LUCE) and the Downtown Community Plan (DCP). Based on the sewer model, the City's sewer system performs well under both existing and future conditions. Under future build out conditions, only 3 percent of the modeled pipelines exhibited a capacity deficiency. None of the identified "deficient" pipelines serve the Project area. Furthermore, to verify that there would not be deficiencies, the City of Santa Monica Public Works Department would require both projects to submit sewer studies to demonstrate adequate capacity, prior to the issuance of building permits. Lastly, as indicated under Impact Statement WW-2, the Project would result in less than significant impacts on wastewater conveyance capacity with implementation of the proposed sewer improvements and implementation of Mitigation Measure MM-WW-1. Therefore, the Project would not contribute to cumulatively considerable impacts on wastewater conveyance capacity, and cumulative impacts would be less than significant.

TABLE 4.20-5
SEWER CAPACITY DEPTH – EXISTING VS. PROPOSED – PHASING SCENARIO A

Test Site	Pipe Size	Recorded Existing Peak Daily Sewage Demand (GPD)	Existing Depth (inches)	Existing Percent Full (%)	Proposed Building Cumulative Daily Sewage Demand Option 1 (Gross) (GPD)[4,5]	Proposed Building Cumulative Daily Sewage Demand Option 2 (Gross) (GPD)[4,5]	Demolished Buildings Cumulative Daily Sewage Demand (GPD)[5]	Total Proposed Daily Sewage Demand Option 1 (Net) (GPD)	Total Proposed Daily Sewage Demand Option 2 (Net) (GPD)	Additional Depth from Proposed Development Option 1 (inches)[3]	Additional Depth from Proposed Development Option 2 (inches)[3]	Total Proposed Depth Option 1 (inches)	Total Proposed Depth Option 2 (inches)	Percent Full Option 1 (%)	Percent Full Option 2 (%)	Proposed Buildings Being Served
Stage A – Buildings S1/S2/S3																
Manhole 5 Broadway 200 FT north of 20th St.	12 in	997,000	4.95	41.3%	42,566	42,566	669	41,897	41,897	1.32	1.32	6.27	6.27	52.3%	52.3%	2D/E, S1, S2, S3, S4, S5
Stage B – Building 2I																
Manhole 2N 20th St. at Santa Monica Blvd	12 in	826,000	4.21	35.1%	15,482	15,482	0	15,482	15,482	0.84	0.84	5.05	5.05	42.1%	42.1%	2I
Manhole 2E Santa Monica Blvd at 20th St.[1,7]	12 in	1,039,000	8.58	71.5%	0	0	1,651	-1,651	-1,651	-0.24	-0.24	8.34	8.34	69.5%	69.5%	2C, Mullin Café, Saint John's Cafe
Manhole 2E Santa Monica Blvd at 20th St. (w/out outlier)[2,7]	12in	390,000	5.75	47.9%	0	0	1,651	-1,651	-1,651	-0.24	-0.24	5.51	5.51	45.9%	45.9%	2C, Mullin Café, Saint John's Cafe
Stage C – Building 2C																
Manhole 2E Santa Monica Blvd at 20th St.[1]	12 in	1,039,000	8.58	71.5%	8,240	31,740	1,651	6,589	30,089	0.6	1.08	9.18	9.66	76.5%	80.5%	2C, Mullin Café, Saint John's Cafe
Manhole 2E Santa Monica Blvd at 20th St. (w/out outlier)[2]	12in	390,000	5.75	47.9%	8,240	31,740	1,651	6,589	30,089	0.6	1.08	6.35	6.83	52.9%	56.9%	2C, Mullin Café, Saint John's Cafe
Stage D – Buildings S4 and S5																
Manhole 5 Broadway 200 FT north of 20th St.	12 in	997,000	4.95	41.3%	95,834	100,657	13,433	82,401	87,224	1.8	1.8	6.75	6.75	56.3%	56.3%	2D/E, S1, S2, S3, S4, S5
State E – Buildings 2D/E, Mullin & SJ Cafe																
Manhole 5 Broadway 200 FT north of 20th St.	12 in	997,000	4.95	41.3%	100,819	122,596	14,729	86,090	107,867	1.8	2.04	6.75	6.99	56.3%	58.3%	2D/E, S1, S2, S3, S4, S5
Manhole 2E Santa Monica Blvd at 20th St.[1]	12 in	1,039,000	8.58	71.5%	8,960	32,460	1,651	7,309	30,809	0.6	1.08	9.18	9.66	76.5%	80.5%	2C, Mullin Café, Saint John's Cafe
Manhole 2E Santa Monica Blvd at 20th St. (w/out outlier)[2]	12in	390,000	5.75	47.9%	8,960	32,460	1,651	7,309	30,809	0.6	1.08	6.35	6.83	52.9%	56.9%	2C, Mullin Café, Saint John's Cafe

[1] The existing depth and flow in this row are the recorded maximum flows that are within the ADS flow monitoring report. However, they are potential outliers and may not be representative of the actual max flows. This event occurred on May 3rd, 2017, just before 3 pm for less than 30 min. It was the only event of its kind to occur during the 14-day monitoring period.

[2] If the above measurement is an outlier and not representative of the MH flows, the following depth and flow should be taken as the existing maximum depth and flow for MH02E. Existing Depth and Flow are obtained from Page 37 of the ADS Providence Saint John's Health Center Flow Monitoring Report April 20, 2017 – May 3, 2017 found in Appendix D.

[3] Additional Proposed Depth calculations can be found in Appendix C.

[4] Proposed Daily Sewage Demand calculations can be found in Appendix B.

[5] Throughout each stage, the flow values of the buildings being constructed/demolished in that stage get added to the corresponding manhole values from the previous stages.

[6] Building 2I adds flow to manhole 2N. The building being demolished in its place originally adds flow to manhole 2E.

[7] The values for total proposed and additional depth are negative because in this stage only a demolished building is affecting the manhole, therefore flow and depth is being removed.

SOURCE: KPFF Consulting Engineers, Sanitary Sewer Study – Providence Saint John's Health Center Phase II Project, April 2019.

TABLE 4.20-6
SEWER CAPACITY DEPTH – EXISTING VS. PROPOSED – PHASING SCENARIO B

Test Site	Pipe Size	Recorded Existing Peak Daily Sewage Demand (GPD)	Existing Depth(inches)	Existing Percent Full%	Proposed Building Cumulative Daily Sewage Demand Option 1 (Gross) (GPD)[4]	Proposed Building Cumulative Daily Sewage Demand Option 2 (Gross) (GPD)[4]	Demolished Buildings Cumulative Daily Sewage Demand (GPD)[4]	Total Proposed Daily Sewage Demand Option 1 (Net) (GPD)	Total Proposed Daily Sewage Demand Option 2 (Net) (GPD)	Additional Depth from Proposed Development Option 1 (inches)[3]	Additional Depth from Proposed Development Option 2 (inches)[3]	Total Proposed Depth Option 1 (inches)	Total Proposed Depth Option 2 (inches)	Percent Full Option 1%	Percent Full Option 2%	Proposed Buildings Served
Stage C – Building 2C and S2																
Manhole 2E Santa Monica Blvd at 20th St.[1]	12in	1,039,000	8.58	71.5%	8,240	31,740	0	8,240	31,740	0.6	1.08	9.18	9.66	76.50%	80.50%	2C, Mullin Café, Saint John's Cafe
Manhole 2E Santa Monica Blvd at 20th St. (w/out outlier)[2]	12in	390,000	5.75	47.9%	8,240	31,740	0	8,240	31,740	0.6	1.08	6.35	6.83	52.90%	56.90%	2C, Mullin Café, Saint John's Cafe
Manhole 5 Broadway 200 FT north of 20th St.	12in	997,000	4.95	41.3%	2,020	2,020	0	2,020	2,020	0.36	0.36	5.31	5.31	44.30%	44.30%	2D/E, S1, S2, S3, S4, S5
Stage A – Buildings S1 and S3																
Manhole 5 Broadway 200 FT north of 20th St.	12in	997,000	4.95	41.3%	42,566	42,566	669	41,897	41,897	1.32	1.32	6.27	6.27	52.30%	52.30%	2D/E, S1, S2, S3, S4, S5
Stage B – Building 2I																
Manhole 2N 20th St. at Santa Monica Blvd	12in	826,000	4.21	35.1%	15,482	15,482	0	15,482	15,482	0.84	0.84	5.05	5.05	42.10%	42.10%	2I
Manhole 2E Santa Monica Blvd at 20th St.[1]	12in	1,039,000	8.58	71.5%	8,240	31,740	1,651	6,589	30,089	0.6	1.08	9.18	9.66	76.5%	80.5%	2C, Mullin Café, Saint John's Cafe
Manhole 2E Santa Monica Blvd at 20th St. (w/out outlier)[2]	12in	390,000	5.75	47.9%	8,240	31,740	1,651	6,589	30,089	0.6	1.08	6.35	6.83	52.9%	56.9%	2C, Mullin Café, Saint John's Cafe
Stage D – Buildings S4 and S5																
Manhole 5 Broadway 200 FT north of 20th St.	12in	997,000	4.95	41.3%	97,854	102,677	13,433	84,421	89,244	1.8	2.04	6.63	6.99	55.30%	58.25%	2D/E, S1, S2, S3, S4, S5
Stage E – Buildings 2D/E, Mullin & SJ Cafe																
Manhole 5 Broadway 200 FT north of 20th St.	12in	997,000	4.95	41.3%	100,819	122,596	14,729	86,090	107,867	1.8	2.16	6.75	7.11	56.30%	59.25%	2D/E, S1, S2, S3, S4, S5
Manhole 2E Santa Monica Blvd at 20th St.[1]	12in	1,039,000	8.58	71.5%	8,960	32,460	1,651	7,309	30,809	0.6	1.08	9.18	9.66	76.5%	80.5%	2C, Mullin Café, Saint John's Cafe
Manhole 2E Santa Monica Blvd at 20th St. (w/out outlier)[2]	12in	390,000	5.75	47.9%	8,960	32,460	1,651	7,309	30,809	0.6	1.08	6.35	6.83	52.9%	56.9%	2C, Mullin Café, Saint John's Cafe

[1] The existing depth and flow in this row are the recorded maximum flows that are within the ADS flow monitoring report. However, they are potential outliers and may not be representative of the actual max flows. This event occurred on May 3rd, 2017, just before 3 pm for less than 30 min. It was the only event of its kind to occur during the 14-day monitoring period.

[2] If the above measurement is an outlier and not representative of the MH flows, the following depth and flow should be taken as the existing maximum depth and flow for MH02E. Existing Depth and Flow are obtained from Page 37 of the ADS Providence Saint John's Health Center Flow Monitoring Report April 20, 2017 – May 3, 2017 found in Appendix D.

[3] Additional Proposed Depth calculations can be found in Appendix C.

[4] Throughout each stage, the flow values of the buildings being constructed/demolished in that stage get added to the corresponding manhole values from the previous stages.

[5] Building 2I adds flow to manhole 2N. The building being demolished in its place originally adds flow to manhole 2E.

SOURCE: KPFF Consulting Engineers, Sanitary Sewer Study – Providence Saint John's Health Center Phase II Project, April 2019.

4.20.5 Mitigation Measures

MM-WW-1: Prior to the issuance of the development review permit for the 2C building, additional sewer monitoring shall be required from the Project Applicant's civil engineer to determine if future project flows (during dry and wet weather conditions) will cause the City's 12-inch line on Santa Monica Boulevard to exceed the hydraulic planning criteria on page 47 in the City's 2017 Sanitary Sewer Master Plan or its successor to. The primary criteria used to establish adequately-sized sewer piping is if the PWWF depth to diameter ratio is less than 0.75, and if the minimum velocity is 2 ft/s. The Project Applicant shall be responsible for any additional improvements identified as being required by the analysis. If the study indicates exceedances of the hydraulic planning criteria due to project flows, Saint John's shall perform sewer upgrades prior to issuance of a Certificate of Occupancy for the 2C building.

MM-WW-2: Prior to the issuance of the development review permit for the earlier of the S3 building or the S4 building, Saint John's shall prepare an updated sewer study to be reviewed and approved by the City. Such study shall determine if future project flows (during dry and wet weather conditions) will cause the City's 12-inch and 21-inch sewer lines on Broadway to exceed the hydraulic planning criteria on page 47 in the City's Sanitary Sewer System Master Plan). The primary criteria used to establish adequately-sized sewer piping is if the Peak Wet Weather Flow (PWWF) depth to diameter ratio is less than 0.75, and if the minimum velocity is 2 ft/s. If the study indicates exceedances of the hydraulic planning criteria due to project flows, Saint John's shall perform sewer upgrades prior to issuance of a Certificate of Occupancy for the earlier of the S3 or S4 building.

4.20.6 Level of Significance after Mitigation

With implementation of MM-WW-1 and MM-WW-2, impacts would be less than significant.

4.21 Utilities – Solid Waste

4.21.1 Introduction

This section estimates the Project's solid waste generation and evaluates whether sufficient capacity exists at the existing and planned designated Class III (non-hazardous municipal solid waste) and inert (non-hazardous inert and green waste) landfills to serve the Project. Consistency with applicable requirements to divert waste and increase recycling of the waste stream is also evaluated. This section incorporates information from sources including, but not limited to the: California Department of Resources Recycling and Recovery (CalRecycle) website; County of Los Angeles Countywide Integrated Waste Management Plan (CIWMP) 2016 Annual Report (published in September 2017); and City of Santa Monica (City) Public Works Department, Resource Recovery & Recycling Division website. See Section 4.9, *Hazards and Hazardous Materials*, of this EIR for analysis of hazardous solid waste (such as medical waste, sharps, microbiological materials, etc.).

4.21.2 Environmental Setting

4.21.2.1 Existing Site Conditions

As discussed in depth in Chapter 2, *Project Description*, of this EIR, the Project Site consists of nine Phase II Development Sites located within the PSJHC Campus. The existing land uses at these development sites include three medical buildings (e.g., Child Family Development Center, Saint John's Foundation Building, John Wayne Cancer Institute), two temporary MRI modular buildings, a 10-unit vacant apartment building, Mullin Plaza, and several surface parking lots.

Existing Class III solid waste generation estimates for the Project Site are included in **Table 4.21-1**, *Estimated Existing Operational Class III Solid Waste Generation at the Project Site*. As indicated therein, the existing uses on the Project Site currently generate an estimated 0.33 tpd of Class III solid waste.

4.21.2.2 Solid Waste Management System

The Resource Recovery & Recycling Division of the City's Public Works Department provides solid waste management and collection services to all City residents and approximately 50 percent of commercial and industrial establishments (City of Santa Monica 2016). The City collects, and transfers trash for disposal, processes green waste and food scraps for compost, sorts and processes single-stream commingled recyclables, and provides a State-authorized e-waste collection facility. The City sorts, cleans, processes, and sends recyclables items to reuse and recycling facilities instead of landfills whenever possible, which is a solid waste management approach otherwise known as diversion. Santa Monica's landfill waste stream is typically comprised of commercial (50 percent) and residential (33 percent) waste, with the remainder consisting of construction and demolition (C&D) debris and additional materials disposed by private companies and individuals (City of Santa Monica 2016).

TABLE 4.21-1
ESTIMATED EXISTING OPERATIONAL CLASS III SOLID WASTE GENERATION AT THE PROJECT SITE

Development Site #	Building Name	Use	Amount (sf/unit)	Solid Waste Generation Rate (day)[a]	Solid Waste Generation (lbs/day)
2C	West Parking Lot	parking	--	--	--
2I	Child & Family Development Center	office	8,059 sf	0.006 lbs/sf	48
		day care, medical clinics	26,611 sf	0.007 lbs/sf	186
		maintenance, storage	585 sf	0.007 lbs/sf	4
2D/E	PSJHC Foundation Bldg.	office	10,800 sf	0.006 lbs/sf	65
	Parking Lot C	parking	--	--	--
Mullin Plaza	Entry plaza, open space	roadway, open space	--	--	--
S1/S3	Temporary MRI Bldg.	office	2,675 sf	0.006 lbs/sf	16
	Parking Lot B	parking	--	--	--
	Parking Lot I	parking	--	--	--
S2	Parking Lot H (portion)	parking	--	--	--
S4 and Saint John's Square	John Wayne Cancer Institute	medical clinics, labs	40,412 sf	0.007 lbs/sf	283
		medical office	10,643 sf	0.006 lbs/sf	64
	10-unit Apartment Blvd.	residential (vacant)	10 units	4 lbs/unit	0
	Parking Lot H (portion)	parking	--	--	--
S5	Parking Lot H (portion)	parking	--	--	--
Total					**666 (0.33 tpd)**

Acronyms and Abbreviations: sf = square feet; lbs. = pounds; tpd = tons per day; tpy = tons per year

[a] Solid waste generation rates from City of Santa Monica, Land Use and Circulation Element Final Environmental Impact Report, Table 4.13-11, SCH No. 2009041117, April 2010.

SOURCE: ESA, 2018.

Currently, approximately 77 percent of solid waste generated in the City is diverted through waste prevention, recycling, and composting, and 23 percent is disposed in landfills or waste-to-energy facilities (City of Santa Monica 2016). The City's current 77 percent diversion rate already exceeds regulatory requirements for 70 percent diversion by 2020 and 75 percent thereafter (see the "Regulatory Setting" subsection below for a discussion of applicable diversion rate regulations).

4.21.2.3 Class III Landfill Capacity

Class III solid waste generated in the City is disposed of at several vicinity landfills following hauls through transfer stations, including one transfer station within the City located at 1980 Frank Street and a community recycling (buy back center) center located at 2411 Delaware Avenue, with a portion of the disposed waste converted to energy resources at waste-to-energy facilities (City of Santa Monica 2016). **Table 4.21-2**, *Solid Waste Facilities Serving the City*, lists the 12 Class III landfills and two refuse-to-energy facilities that served the City in 2016, the latest year for which data is available. As indicated therein, in 2016 the City generated 75,429 tons of Class III solid waste disposed of at area landfills (or 242 tons per day [tpd]) and 13,005 tons of solid waste processed at area refuse-to energy facilities. The remaining disposal capacity of the landfills serving the City at 659 million tons. As further indicated therein, the City's 242 tpd of Class III solid waste disposed of at area landfills represents a very small proportion (approximately 0.5 percent) of the total daily Class III solid waste (47,170 tpd) received by these landfills.

TABLE 4.21-2
SOLID WASTE FACILITIES SERVING THE CITY OF SANTA MONICA

Solid Waste Facility	Remaining Disposal Capacity (million tons)[a]	Remaining Design Life (years)[a]	Permitted Daily Disposal Capacity (tpd)[a]	Average Daily Intake (tpd)[a]	Santa Monica Disposal in 2016 (not diverted) (tpy)[b]
Class III Landfills					
Antelope Valley Public Landfill	13	23	1,800	1,582	2,827
Chiquita Canyon Sanitary Landfill	48	45	12,000	4,544	56,775
El Sobrante Landfill	141	54	16,054	8,503	395
Frank R. Bowerman Sanitary Landfill	107	36	11,500	6,865	2,516
Lancaster Landfill and Recycling Center	10	25	3,000	550	783
Mid Valley Sanitary Landfill	40	53	7,500	3,061	212
Olinda Alpha Sanitary Landfill	19	8	8,000	6,891	745
Prima Deschecha Sanitary Landfill	78	85	4,000	867	8
San Timoteo Sanitary Landfill	7	25	2,000	878	21
Simi Valley Landfill & Recycling Center	52	67	6,000	2,933	2,054
Sunshine Canyon City/County Landfill	62	21	12,100	7,496	9,092
Victorville Sanitary Landfill	82[c]	29[c]	3,000[c]	3,000[d]	1
Total	**659**	**--**	**86,954**	**47,170**	**75,429 (242 tpd)[e]**
Refuse to Energy Facilities					
Commerce Refuse-To-Energy Facility	N/A	N/A	1,000	350	7,868
Southeast Resource Recovery Facility	N/A	N/A	2,240	1,344	5,137
Total	**N/A**	**N/A**	**3,240**	**1,694**	**13,005 (42 tpd)[e]**
Inert Landfills (not including IDEFOs)					
Azusa Land Reclamation Facility	56	153	6,500	1,183	2,315
Total	**56**	**--**	**6,500**	**1,183**	**2,315 (7 tpd)[e]**

Acronyms and Abbreviations: tpd = tons per day, tpy = tons per year; IDEFOs = Inert Debris Engineered Fill Operations.

[a] Data from County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan, 2016 Annual Report, September 2017.

[b] Data from CalRecycle 2016 Jurisdictional Disposal by Facility Report for City of Santa Monica, http://www.calrecycle.ca.gov/LGCentral/Reports/Viewer.aspx?P=ReportYear%3d2016%26ReportName%3dReportEDRSJurisDisposalByFacility%26OriginJurisdictionIDs%3d474. Accessed April 11, 2018.

[c] Data from CalRecycle 2018 SWF Facilities Directory, http://www.calrecycle.ca.gov/SWFacilities/Directory/36-AA-0055/Detail/. Accessed April 11, 2018.

[d] The 2016 average daily intake rate was not available for the Victorville Sanitary Landfill. In order to provide a conservative analysis, it is assumed that the 2016 average daily intake for this landfill is the maximum permitted daily disposal capacity at this landfill.

[e] Estimates based on a 6-day a week disposal rate (e.g., no disposal on Sundays) per CalRecycle.

SOURCE: ESA, 2018.

4.21.2.4 Inert Landfill Capacity

The annual amount of disposed inert waste materials by the City in 2016, such as dirt/soil, landscaping, concrete and asphalt, was 2,315 tons (County of Los Angeles 2017). As of 2016, the Azusa Land Reclamation Facility is the only permitted Inert Waste Landfill in Los Angeles County with a full solid waste facility permit. The remaining capacity of this landfill is estimated at 56.34 million tons (County of Los Angeles 2017). Given the remaining permitted capacity and at the average disposal rate of 1,183 tons per day (tpd) in 2016, this capacity would be exhausted in approximately 153 years (County of Los Angeles 2017). In addition, there are a number of Inert Debris Engineered Fill Operation Facilities (IDEFOs) (e.g., Arcadia Reclamation Facility, etc.) operating under State permit provisions that provide additional capacity in the County, processing approximately 2.36 million tons in 2016 (County of Los Angeles 2017).

4.21.2.4 Recycling Facilities

Historically, the City has sorted and delivered recyclable materials to a contractor (Allan Company), who processes and markets the recyclables to domestic and overseas mills for further manufacturing uses. The City used to receive revenue from the contractor for the recyclables collected and marketed. However, in 2018, China enacted their National Sword policy banning certain types of foreign recyclables. This policy caused a disruption in the global recycling industry that has affected the City.

Although the City continue its curbside recycling collection for residential and commercial customers, the crash in the market for recyclables means that the City must consider alternative strategies including more public education. Despite the volatility in the recycling industry, the City has indicated its continued committed to achieving its zero waste goal. The Zero Waste Strategic Operations Plan is currently being updated to account for the changes in the recycling industry.

4.21.3 Regulatory Framework

4.21.3.1 State

Assembly Bill 939 - California Integrated Waste Management Act of 1989

The State Legislature passed the California Integrated Waste Management Act of 1989 (AB 939) to improve solid waste disposal management with respect to (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. AB 939 mandates jurisdictions to meet a diversion goal of 25 percent by 1995 and 50 percent by 2000.

AB 939 requires that all counties have to prepare a CIWMP. The CIWMP has to include had to include a SRRE to address waste characterization, source reduction, recycling, composting, solid waste facility capacity, education and public information, funding, special waste (asbestos, sewage sludge, etc.), and household hazardous waste. The CIWMP also has to include a Nondisposal Facility Element (NDFE) to identify nondisposal facilities to be used in order to assist counties in reaching AB 939's diversion mandates. Nondisposal facilities include material recovery facilities, transfer stations, large-scale composting facilities, and other facilities that require a solid waste facility permit. Lastly, the CIWMP has to include a Household Hazardous Waste Element (HHWE) to reduce the amount of hazardous household waste generated and to provide the County with convenient collection services and promote waste minimization/ reduction techniques. It also

requires counties to develop a Siting Element that addresses how each county, and cities within that county, will manage their solid waste disposal over 15-year planning periods. The Siting Elements also include goals and policies to ease the use of out-of-County/remote landfills and foster the development of alternatives to landfill disposal (e.g. conversion technologies). Oversight of these activities was set up under the charge of the California Integrated Waste Management Board (CIWMB). The duties and responsibilities of CIWMB were transferred to the CalRecycle as of January 1, 2010.

Assembly Bill 1327 – California Solid Waste Reuse and Recycling Access Act of 1991

The California Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327), passed on October 11, 1991, required CalRecycle to develop a model ordinance for adoption of recyclable materials in development projects by March 1, 1993. Local agencies were then required to adopt the model, or an ordinance of their own, governing adequate areas for collection and loading of recyclable materials in development projects by September 1, 1993. If, by that date, a local agency had not adopted its own ordinance, the model ordinance adopted by the CalRecycle took effect and shall be enforced by the local agency.

Senate Bill 1374 – Construction and Demolition Waste Materials Diversion Requirements

Senate Bill 1374 was signed into law in 2002 to assist jurisdictions with diverting their construction and demolition (C&D) waste material. The legislation requires that the CIWMB complete five items in regards to the diversion of construction and demolition waste: 1) adopt a model ordinance for diverting 50 percent to 75 percent of all construction and demolition debris from landfills; 2) consult with multiple regulators and waste entities (e.g. California State Association of Counties, private and public waste services, building construction materials industry, etc.) during the development of the model ordinance; 3) compile a report on programs that can be implemented to increase diversion of C&D debris; 4) post a report on the agency's website for general contractors on methods that contractors can use to increase diversion of C&D waste materials; 5) post on the agency's website a report for local governments with suggestions on programs to increase diversion of C&D waste materials. The model ordinance was adopted by CalRecycle on March 16, 2004.

Assembly Bill 341 – Amendments to the California Integrated Waste Management Act of 1989

AB 341, adopted on October 6, 2011, amends AB 939 by mandating that jurisdictions meet a solid waste diversion goal of 75 percent by the year 2020, and requires commercial enterprises and public entities that generate four or more cubic yards (cy) per week of solid waste, and multi-family housing complexes with five or more units, to adopt recycling practices that achieve a 75 percent reduction in their waste streams by year 2020.

Assembly Bill 1826 – Organic Recycling

Effective April 1, 2016, AB 1826 requires businesses that generate more than four cubic yards of organic waste (food, green and non-hazardous wood waste) per week, and multi-family properties with five units or more, to provide separate recycling bins for organic waste, and requires that local

jurisdictions implement an organic waste recycling program to divert organic waste generated by businesses. Furthermore:

a) Effective April 1, 2016, all businesses that generate eight cubic yards of organic waste per week shall arrange for organic waste recycling services.

b) Effective January 1, 2017, all businesses that generate four cubic yards of organic waste per week shall arrange for organic waste recycling services.

c) Effective January 1, 2019, all businesses that generate four cubic yards or more of commercial solid waste per week shall arrange for organic waste recycling services.

d) Effective January 1, 2020, if statewide disposal of organic waste has not been reduced to 50 percent of the level of disposal during 2014, all businesses that generate two cubic yards or more of commercial solid waste per week shall arrange for organic waste recycling services.

4.21.3.2 Regional

Countywide Integrated Waste Management Plan

Pursuant to AB 939, each County is required to prepare and administer a CIWMP, including preparation of an Annual Report. The CIWMP, per AB 939, is to comprise of the various counties' and cities' solid waste reduction planning documents, plus an Integrated Waste Management Summary Plan (Summary Plan) and a Countywide Siting Element (CSE). The Summary Plan describes the steps to be taken by local agencies, acting independently and in concert, to achieve the mandated state diversion rate by integrating strategies aimed toward reducing, reusing, recycling, diverting, and marketing solid waste generated within the County. The County's Department of Public Works is responsible for preparing and administering the Summary Plan and the CSE. The Summary Plan for the County was approved by CalRecycle on June 23, 1999. The latest CSE was approved by CalRecycle in 2012.

In addition, as part of its regulatory efforts, the County has prepared a long-term master plan which describes how the County will manage solid waste through the year 2050. The 2050 Plan identifies measures to meet the landfill needs over the time horizon and includes such measures as conserving in-County disposal capacity, implementing waste diversion programs, fostering alternatives to landfills, and identifying funding resources to carry out the plan.

4.21.3.3 City of Santa Monica

Santa Monica Sustainable City Plan

The Sustainable City Plan was updated in 2014 to include a range of new targets and goals for citywide sustainability, including the goal to become a zero waste city for solid waste management. The Resource Conservation section of the Santa Monica Sustainable City Plan establishes a target for diverting the amount of solid waste that is disposed of at landfills. By the year 2020, 85 percent of solid waste is required to be diverted, per capita solid waste generation must be reduced to 2.4 pounds per person per day, and total solid waste generated should not exceed year 2000 levels.

Zero Waste Strategic Operations Plan

In 2009, the City began a Zero Waste Strategic Planning process to identify the new policies, programs and infrastructure that will enable the City to reach its Zero Waste goal of 95 percent

diversion by 2030, or a per capita disposal rate of 1.1 pounds per person per day. The Strategic Operations Plan was adopted in 2014.

Non-Recyclable Plastic Food Service Container Ordinance

The NonRecyclable Plastic Food Service Container Ordinance (Santa Monica Municipal Code Chapter 5.44 (adopted in 2007 and amended in August 2018) prohibits the distribution of certain non-marine degradable disposable food service ware (including plates, bowls, trays, containers, straws, utensils, stirrers, cups, and lid plugs) and polystyrene beverage lids by food and beverage providers in the City. The ordinance further requires that all marine degradable disposable straws and utensils be provided to customers only upon request. The ordinance applies to all food and beverage providers, including but not limited to restaurants, delicatessens, grocery stores, non-profit and for-profit organizations, groups and individuals serving prepared food in Santa Monica as part of their services. The ordinance also apply to all City facilities, City sponsored events, and City permitted events that serve prepared food.

Single Use Carryout Plastic Bag Ban Ordinance

The 2011 City of Santa Monica's Single-use Carryout Bag Plastic Ban Ordinance (Ordinance No. 2348) prohibits all retail establishments in Santa Monica from providing single-use plastic carryout bags to customers at the point of sale. "Single-use Carryout Plastic Bag" is defined as any bag that is less than two and one-quarter mils thick and is made predominately of plastic derived from petroleum or from biobased sources, such as corn or other plant sources. Grocery stores, convenience stores, mini-marts, liquor stores and pharmacies are permitted to provide customers with paper bags made from at least 40% post-consumer recycled content. These types of retailers are required to charge customers at least ten cents per paper bag.

Land Use and Circulation Element

Below are the City of Santa Monica Land Use and Circulation Element (LUCE) policies that relate to solid waste:

> **Policy S8.1:** Expand solid waste diversion strategies such as increased commercial recycling collection and outreach, expanded food waste collection, and waste to energy conversion programs.
>
> **Policy S8.2:** Develop a Zero-Waste Strategic Plan with an aggressive target for waste diversion by 2030.
>
> **Policy S8.3:** Continue to implement the ban on non-recyclable plastic food containers and continue to pursue a ban on plastic bags.

Hospital Area Specific Plan (1988, revised 1993 and 1998)

The Hospital Area Specific Plan (HASP) includes the following hazardous materials objectives applicable within the HASP area, including at the Project Site:

- **Objective 53:** Solid waste collection points should be established with respect to residents' convenience and collection timing should be established so as not to disrupt neighborhood functions.

Santa Monica Municipal Code

SMMC Section 8.108.010, Subpart C (Construction and Demolition Ordinance), requires that demolition and/or construction projects costing $50,000 or more, projects of 1,000 sf or more, and all demolition-only projects divert at least 70 percent of their C&D material from landfills. Applicants for construction or demolition permits involving these covered projects are required to complete and submit a waste management plan (WMP), on a WMP form approved by the City for this purpose, as part of the application packet for the construction or demolition permit. The completed WMP is required to identify all of the following:

- The estimated volume or weight of the project C&D material, by material type, to be generated;
- The maximum volume or weight of such materials that can feasibly be diverted via reuse or recycling;
- The vendor or facility where the applicant proposes to use to collect or receive that material;
- The estimated volume or weight of C&D materials that will be landfilled in Class III landfills and inert disposal facilities; and
- A commitment that only City-permitted waste haulers would be use.

SMMC Section 5.08.400 (Solid Waste Diversion) establishes direction for characterizing and reducing solid waste generation in the City. The requirements in this section of the SMMC are a furtherance of state-mandated diversion criteria, and are based, in large part, on the Waste Characterization Study and SRRE that the City completed in 1992.

SMMC 9.21.130 (Resource Recovery and Recycling Standards) establishes requirements for new construction to provide refuse and recycling containers in a secure storage and staging area.

4.21.4 Environmental Impacts

4.21.4.1 Thresholds of Significance

Appendix G of the State CEQA Guidelines provides questions that address potential impacts related to solid waste. The CEQA guidelines provides that lead agencies may use the questions set forth in the Appendix G to assess the significance of a project's environmental effects, and the use of Appendix G as a significance threshold is routinely sanctioned by the courts (although such use is not mandatory). These questions are listed below and are used as the significance thresholds by the City in this section.

Would the project:

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

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

4.21.4.2 Methodology

The analysis of impacts on solid waste disposal estimates the amount of solid waste that would be generated by the Project and analyzes whether sufficient landfill capacity is available to receive that solid waste. The amount of solid waste to be generated by the Project is estimated by applying CalRecycle solid waste generation factors to the proposed land uses[1], and identifying the net (proposed minus existing) increase in solid waste generation under the Project, taking into account the City's prevailing diversion rate.

The availability of existing landfill capacity to accommodate the net increase in solid waste that would be generated by the Project is based on the existing and projected future remaining landfill capacity identified for the County landfills serving the Project Site (from the CIWMP 2016 Annual Report published in September 2017, with 2016 being the latest year for which landfill data is available).

The analysis also addresses the Project's consistency with policies and programs related to solid waste. Applicable policies and programs are summarized, and their goals and standards to divert solid waste from landfills and increase the recycling of materials are noted. The Project's characteristics are considered as part of the consistency review.

The focus of this section is on municipal (non-hazardous) solid waste. Please see Section 4.9, *Hazards and Hazardous Materials*, of this EIR for analysis of hazardous solid waste (such as medical waste, sharps, microbiological materials, etc.).

4.21.4.3 Project Characteristics

The Project would demolish the existing medical research/ laboratory, medical office, day care, office, vacant residential apartment, and parking uses within the Project Site, and develop new hospital/health care, medical research, medical office, neighborhood commercial, restaurant, day care, visitor housing, multifamily residential, and parking uses. As detailed in Chapter 2, *Project Description*, of this EIR, the Project would include the demolition of approximately 110,055 sf of building floor and develop approximately 682,700 sf of new building floor area, for a net increase of approximately 572,645 sf.

The Project's compliance with the following applicable solid waste regulations would reduce or avoid potential solid waste disposal and have been accounted for in the impact analysis:

- Construction and Demolition Waste Management. In accordance with SMMC Section 8.108.010, the Applicant will submit a Waste Management Plan (WMP) for C&D waste meeting City requirements as part of the application packet for demolition permits. In accordance with SMMC Section 8.108.010, Project construction will achieve at least a 70 percent solid waste diversion rate.
- Solid Waste Diversion. In accordance with AB 341, Project operational activities will achieve

[1] As indicated in Table 4.21-1, no existing solid waste generation is attributed to the existing 10 vacant multi-family housing units. By assuming that the solid waste associated with the 10 proposed replacement units would represent a net increase in solid waste, a conservative analysis is provided.

at least a 70 percent solid waste diversion rate until 2020, and at least a 75 percent solid waste diversion rate thereafter, through source reduction, recycling, composting and other methods. AB 341 does not apply to construction waste.

- Recycling Bins for Organic Waste. In accordance with Assembly Bill 1826, the Project will provide separate recycling bins for organic waste, and will arrange for organic waste recycling services.
- Enclosed Refuse Areas. The Project will provide the number and sizes of City-provided Class III, commingled recyclables, and green/organics refuse bins required to accommodate the solid waste streams generated by the Project, and will house these bins in enclosed refuse areas.

4.21.4.4 Project Impacts

Solid Waste Generation

Impact SW-1: *Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Impact Statement SW-1: The Project would generate additional solid waste that would require landfill disposal. However, through compliance with applicable solid waste diversion requirements, the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts would be less than significant.

Construction

Project construction would include the demolition of approximately 111,000 square feet of existing buildings and approximately 312,641 sf of other hardscape, the export of approximately 919,662 cy of excavated soil, and the construction of approximately 682,700 square feet of new buildings. As indicated in **Table 4.21-3**, *Estimated C&D Solid Waste Generation*, this would generate a total estimated 1,006,756 tons of inert C&D waste, including demolition debris, exported soil, and construction debris, or an estimated 302,027 tons after the 70 percent diversion required by Section 8.108.010 Subpart C of the SMMC.

The estimated 302,027 tons of inert C&D waste that would be generated by the Project would require disposal at the County's only operating inert landfill (Azusa Land Reclamation) or at any of a number of IDEFOs in the County such as the Arcadia Reclamation Facility. As indicated previously, the remaining disposal capacity for the Azusa Land Reclamation Facility is 56.34 million tons, the permitted intake is 6,500 tpd, the average existing intake is 1,183 tpd, the City currently disposed of approximately 7 tpd at this facility, and this facility has a remaining life span of approximately 153 years (County of Los Angeles 2017). The Project's total solid waste disposal need during construction, after the required 70 percent diversion, would represent approximately 0.54 percent of the estimated remaining capacity of the Azusa Land Reclamation Facility. This estimate is conservative because it does not take into account the additional inert disposal capacity provided by the IDEFOs. Therefore, Project construction would have a less than significant impact on the capacity of the inert land and IDEFOs serving the City.

TABLE 4.21-3
ESTIMATED PROJECT C&D SOLID WASTE GENERATION

Debris Type Site Preparation	Quantity	Generation Factor	Waste Generation (tons)
Demo Building Floor Area	111,000 sf	[a]	5,093
Demo Other Hardscape	312,641 sf	[b]	6,947
Exported Soil	919,662 cy		993,235
Site Preparation Subtotal			*1,005,275*
Building Construction			
Total New Building Area	682,700 sf	[c]	1,481
Building Subtotal			*1,481*
Total			**1,006,756**
Total with 70% Diversion			**302,027**

Abbreviations: cy = cubic yards; sf = square feet

[a] Building Floor Area (ft^2) x Height (10ft) x $\frac{0.25\ ft3\ waste\ volume}{1ft3\ building\ volume}\ x\ \frac{1yd3}{27ft3}\ x\ \frac{0.5\ ton}{1yd3\ building\ waste}$ =tons of building debris. From CalEEMod.

[c] Hardscape Area (ft^2) x Thickness (0.5ft) x $\frac{1yd3}{27ft3}\ x\ \frac{2400\ pounds}{1yd3\ \ loose\ asphalt}\ x\ \frac{1\ ton}{2000\ pounds}$ =tons of hardscape debris. From CalRecycle.

[c] 1 sf = 0.00217 tons. From U.S. EPA, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, 2003. Factor converted from 4.34 lbs/sf to 0.00217 tons/sf.

SOURCE: ESA, 2018.

Operation

Project operation would result in a net increase in solid waste generation that would place an increased demand on the capacity at the landfills serving the City. To determine if there is sufficient existing and future landfill capacity to accommodate this increase, the projected waste generated by Project operation is estimated in **Table 4.21-4**, *Estimated Project Operational Class III Solid Waste Generation*, based on the square footage of the proposed uses and the number of multi-family residential and visitor housing units, the Project would generate a net increase in Class III solid waste of an estimated 8,088 lbs/day (4.04 tpd). Assuming the 75 percent diversion rate required by existing regulations starting in 2020 (which is conservative given that the City's existing diversion rate is already 77 percent), and netting out the Class III solid waste generated by the existing on-site uses to be removed, Project operation would result in a net increase in Class III solid waste of an estimated 1,856 lbs/day (0.93 tpd or 290 tpy[2]) which would require disposal at the 12 Class III landfills and two refuse-to-energy facilities serving the City.

As indicated in Table 4.21-2, the 12 Class III landfills that currently serve the City have a combined remaining capacity of 659 million tons, a combined permitted daily intake of 86,170, a combined current intake of 47,170 tpd, and remaining lives of between 8 and 85 years. The additional 0.93 tpd of Class III solid waste to be generated by Project operation would comprise approximately 0.002 percent of the remaining permitted daily intake at these landfills of 39,000 tpd. Therefore, the additional Class III solid waste to be generated by Project operation would have a negligible impact on the existing remaining capacity of the Class III landfills serving the City.

[2] Based on a 6-day a week disposal rate (e.g., no disposal on Sundays) per CalRecycle

TABLE 4.21-4
ESTIMATED PROJECT OPERATIONAL CLASS III SOLID WASTE GENERATION

Development Site #	Building Name	Use	Amount (sf/unit)	Solid Waste Generation Rate (day)[a,b]	Solid Waste Generation (lbs/day)
S1	Child & Family Development Center	Child and family development	25,000 sf	0.007 lbs/sf	175
		day care	15,000 sf	0.007 lbs/sf	105
		subterranean parking	--	--	--
S2	Multifamily Housing	multifamily housing	10 units	4 lbs/unit	40
		neighborhood commercial	800 sf	0.006 lbs/sf	5
		subterranean parking	--	--	--
S3	West Ambulatory Care & Research Building	hospital/health care	65,000 sf	0.015 lbs/sf[c]	975
		medical research (JWCI)	115,000 sf	0.007 lbs/sf	805
		restaurant, neighborhood commercial, or health Services	5,000 sf	0.007 lbs/sf	35
		subterranean parking	--	--	--
S4	Education & Conference Center and East Ambulatory Care & Research Building	education and conference cntr.	60,000 sf	0.010 lbs/sf[c]	
		hospital/health care	120,000 sf	0.015 lbs/sf[c]	1,800
		health and wellness	35,000 sf	0.007 lbs/sf	245
		medical research	50,000 sf	0.007 lbs/sf	350
		health services, restaurant, or neighborhood commercial	10,000 sf	0.007 lbs/sf	70
		subterranean parking	--	--	--
S5	Visitor Housing	visitor housing	30-34 units	4 lbs/unit	136
		subterranean parking	--	--	--
--	Saint John's Cafe'	restaurant or neighborhood commercial	900 sf	0.006 lbs/sf	5
2C	West Ambulatory & Acute Care Building	hospital/health care	117,500 sf	0.015 lbs/sf[c]	1,763
		health services, restaurant, or neighborhood commercial	5,500 sf	0.007 lbs/sf	39
		pedestrian connections	--	--	--
		subterranean parking	--	--	--
2D/E	East Ambulatory & Acute Care Building	hospital/health care	78,500 sf	0.015 lbs/sf[c]	1,178
		health services, restaurant, or neighborhood commercial	3,000 sf	0.007 lbs/sf	21
		pedestrian connections	--	--	--
2I	20th Street Medical Building	medical office	50,000 sf	0.006 lbs/sf	300
		health services, restaurant, or neighborhood commercial	4,500 sf	0.007 lbs/sf	32
		above-grade parking structure	--	--	--
		subterranean parking	--	--	--
--	Mullin Plaza Cafe	restaurant or neighborhood commercial	1,500 sf	0.006 lbs/sf	9
Total (Gross)					**8,088 (4.04 tpd)**
Total Existing					**666 (0.33 tpd)**
Total (Net)					**7,422 (3.71 tpd)**
Total Net With 75% Diversion					**1,856 (0.93 tpd)**

Acronyms and Abbreviations: sf = square feet; lbs. = pounds; tpd = tons per day; tpy = tons per year

[a] City of Santa Monica, Land Use and Circulation Element Final Environmental Impact Report, Table 4.13-11, Solid Waste Generated from the Proposed LUCE, SCH No. 2009041117, April 2010.

[b] Where multiple uses may be possible, the use with the highest solid waste generation rate is selected to provide a conservative analysis.

[c] City of Santa Monica, Saint John's Hospital and Health Center Development Agreement Environmental Impact Report/Environmental Assessment, SCH #97011022, September 3, 1997.

SOURCE: ESA, 2018.

County planning for future landfill capacity addresses expected cumulative demand over 15-year planning increments. The CIWMP 2016 Annual Report anticipates that County population growth will increase from approximately 10.26 million to approximately 11.25 million between years 2016 and 2031 (a 9.0 percent increase), and that employment will increase from approximately 4.38 million to approximately 5.09 million (a 13.9 percent increase) during the same period (County of Los Angeles 2017). Even if it is assumed that by 2031 the two Class III landfills serving the City with life spans that will end by 2031 (e.g., Lancaster and San Timoteo with a combined 3,572 of remaining capacity) are no longer accepting solid waste, and assuming that the balance of the Class III landfills serving the City would have 13.9 percent less remaining intake capacity than they currently do (e.g., 33,579 tpd instead of 39,000 tpd), the Project's operational Class III solid waste would still have a negligible (e.g., 0.002 percent) impact on the anticipated future (e.g., 2031) remaining capacity of the Class III landfills serving the City. Furthermore, even if it is assumed that the demand for solid waste disposal capacity would continue to increase between 2031 and 2042 (when the Project is anticipated to reach full occupancy), and even if it is assumed that additional disposal capacity available to the City would not increase after 2031 which is a highly conservative assumption, Project operational solid waste would still have a negligible impact (e.g., 0.003 percent) on the remaining capacity of the Class III landfills serving the City.

In addition, the City has achieved significant waste reduction targets and continues to strive for additional reductions in solid waste. The City has met and exceeded its Sustainable City Plan goals for waste diversion with a current diversion rate of 77 (City of Santa Monica 2016). In addition, the City's Zero Waste Strategic Operations Plan identifies policies, programs, and infrastructure that will enable the City to reach its zero waste goal of 95 percent diversion by 2030 (City of Santa Monica 2016). These efforts will further reduce per capita waste generation in the future, thereby reducing existing waste generation in the City, including by the Project.

Therefore, through compliance with applicable solid waste diversion requirements, the Project would be served by a landfill(s) with sufficient permitted capacity to accommodate the Project's solid waste disposal needs, and impacts would be less than significant.

Consistency with Solid Waste Standards and Reduction Goals

As indicated above, the Project would generate solid waste during construction and operation. However, the Project would comply with applicable State and local solid waste disposal regulations and standards, including: the 70 percent diversion of construction solid waste required by SB 1374, AB 939, AB 341, and SMMC Section 8.108.010; the submission of a WMP to the City for C&D waste required by the SMMC; and provision of separate recycling bins for recycling and organic solid waste, and arrangement for waste recycling services for this solid waste, required by AB 1826. With compliance with these regulations and standards, the Project would not impair the attainment of applicable solid waste reduction goals, and impacts would be less than significant.

Solid Waste Regulatory Compliance

Impact SW-2: *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Impact Statement SW-2: The Project would be implemented in compliance with all applicable management and reduction statues and regulations related to solid waste. Therefore, the impact would be than significant.

The Project would comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling, as summarized above in the Regulatory Framework and Project Characteristics subsections above. In accordance with SMMC Section 8.108.010, the Applicant will submit a WMP for C&D waste thus meeting City requirements as part of the application packet for demolition permits. Per SB 1374, AB 939, AB 341, and SMMC Section 8.108.010, Project construction activities would achieve at least a 70 percent solid waste diversion rate. In accordance with Assembly Bill 1826, the Project would provide separate recycling bins for organic waste, and would arrange for organic waste recycling services. Lastly, the Project would include the provision of municipal commingled recycle refuse bins required to accommodate the solid waste streams generated by the Project, and would house these bins in enclosed refuse areas.

Compliance with applicable City regulations (including diversion requirements) would ensure that the Project complies with applicable solid waste management and reduction statutes and regulations. Therefore, the impact would be less than significant.

4.21.4.5 Cumulative Impacts

Development of the Project, in conjunction with the 112 of the 131 cumulative projects in the City, would contribute to cumulative solid waste generation impacts to landfills and waste disposal facilities used by the City. As discussed above, County planning for future landfill capacity addresses expected cumulative demand over 15-year planning increments, with the current CIWMP covering the 2016-2031 planning horizon.

The 12 Class III landfills that currently serve the City have a combined remaining capacity of 659 million tons, a combined permitted intake of 86,170 tpd, a combined current intake of 47,170 tpd, and remaining lives of between 8 and 85 years. Even if it is assumed that the two Class III landfills serving the City with life spans that will end before the 2031 planning horizon of the current CIWMP (e.g., Lancaster and San Timoteo with a combined 3,572 of remaining capacity), and assuming that the balance of the Class III landfills serving the City would have 13.9 percent less remaining intake capacity by 2031 than they currently do (e.g., 33,579 tpd instead of 39,000 tpd), the Project's operational Class III solid waste (0.93 tpd) would still have a negligible (e.g., 0.003 percent) impact on the anticipated future (e.g., 2031) remaining capacity of the Class III landfills serving the City.

Furthermore, the proposed Project and each of the cumulative projects would be required to comply with applicable solid waste management and reduction statutes and regulations that have been established to attain City and County solid waste regulation goals.

Lastly, the City met and exceeded its Sustainable City Plan goals for waste diversion with a current diversion rate of 77 (City of Santa Monica 2016), and the City's Zero Waste Strategic Operations Plan identifies policies, programs, and infrastructure that will enable the City to reach its zero waste goal of 95 percent diversion by 2030 (City of Santa Monica 2016). These efforts will further reduce per capita waste generation in the future.

Based on the above, the Project would not contribute considerably to cumulative impacts on landfill capacity, and the cumulative solid waste impact would be less than significant.

4.21.5 Mitigation Measures

No mitigation measures are required, as impacts would be less than significant with compliance with regulatory requirements related to solid waste disposal and recycling.

4.21.6 Level of Significance After Mitigation

No mitigation measures are required. Project-specific and cumulative impacts related so solid waste would be less than significant.

CHAPTER 5
Alternatives

5.1 Introduction

This section of the EIR evaluates alternatives to the Project, and analyzes the comparative environmental impacts associated with each alternative. Under CEQA, and as indicated in California Public Resources Code Section 21002.1(a), the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process intended to consider ways to mitigate or avoid the significant environmental effects of a project.

Guidance regarding the definition of project alternatives is provided in State *CEQA Guidelines* Section 15126.6(a) as follows:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.*

The State *CEQA Guidelines* emphasize that the selection of project alternatives be based primarily on the ability to reduce significant impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (Section 15126.6(b)) The State *CEQA Guidelines* further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are analyzed. (Section 15126.6(f)).

In selecting project alternatives for analysis, potential alternatives should be feasible. The State *CEQA Guidelines* Section 15126.6(f)(1) explains that:

> *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.*

The State *CEQA Guidelines* require the analysis of a "no project" alternative and, depending on the circumstances, evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. In general, the environmentally superior alternative is the alternative with the least adverse impacts on the environment. If the environmentally superior alternative is the "no project" alternative, the EIR

shall also identify another environmentally superior alternative among the other alternatives. (Section 15126.6(e)(2))

Section 15126.6(d) of the State *CEQA Guidelines* states that alternatives analysis need not be presented in the same level of detail as the assessment of the proposed project. Rather, the EIR is required to provide sufficient information to allow meaningful evaluation, analysis and comparison with the proposed project. If an alternative would cause one or more significant impacts in addition to those of the proposed project, analysis of those impacts is to be discussed, but in less detail than for the proposed project.

5.2 Objectives of the Project

Chapter 2.0, *Project Description*, of this EIR identifies the Project objectives for the Project as defined by the Applicant. These objectives are outlined below:

Objective 1: Health Care and Related Uses and Facilities – Ensure that PSJHC will function as part of an integrated health services delivery system that provides a range of care for Santa Monica and surrounding communities including acute care, outpatient (ambulatory) treatment, health and medical research, illness and disease prevention, community health education, and patient and family supportive services. In particular, PSJHC seeks to provide modern, state-of-the-art facilities within Santa Monica's Healthcare Mixed Use District with sufficient floor area and appropriate floor plates for the following health care and related services:

- Acute Care – Additional acute care services including in-patient hospital beds.
- Ambulatory (Outpatient Care) – Ambulatory health care services, potentially including services in the following areas: cardiovascular, women and children, neuroscience, cancer, joint replacement and sports medicine, surgery, molecular pathology, histology and cytology.
- Medical Research – A new research facility for the John Wayne Cancer Institute that meets the needs of contemporary medical research and connects medical research with related clinical services.
- Education and Conferencing – Facilities for education and conferencing activities including (i) an auditorium to accommodate large group conferences such as medical/scientific symposia and (ii) smaller conference rooms/classrooms to facilitate smaller conferences and meetings.
- Visitor Housing – Short-term housing for patients, their family members, visiting health care professionals, and participants in conferences and seminars at PSJHC.
- Restaurants and Neighborhood Serving Uses – Restaurants/food service and other neighborhood-serving uses for use by PSJHC workforce, visitors, patients and neighbors and to activate the pedestrian areas in the vicinity of Mullin Plaza, Saint John's Square and Santa Monica Boulevard.

Objective 2: Required Uses and Facilities – Ensure that PSJHC provides the following uses and facilities as required by the DA:

- Child Care – An expanded child care program to meet the additional child care needs generated by the Phase II Project workforce as determined in accordance with the DA.

- Replacement Housing – Replacement of the existing ten-unit rental housing building as part of the Phase II Project in accordance with the DA.

Objective 3: Phase II Master Plan and Development Program – Develop a comprehensive Master Plan for Phase II of the PSJHC Campus (Phase II Master Plan) and a Development Program that are designed to achieve the following objectives:

- Uses and Facilities – Achieves Project Objectives 1 and 2 with respect to health care and related uses and facilities.
- Vested Uses and Vested Floor Area – Accommodates PSJHC Vested Uses and Vested Floor Area as provided in the DA.
- Campus Integration – Integrates the buildings, uses, location of uses, open space, infrastructure and circulation for Phases I and II, both north and south of Santa Monica Boulevard.
- Location of Uses – Ensures that acute care, outpatient treatment and related services are situated in close proximity to each other in order to maximize efficiency, provide convenient patient access to needed and assistive services, and control costs.
- Open Space – Preserves and expands open space on PSJHC Campus in accordance with the DA requirement of 35% open space on the South Campus and links the open space areas with pedestrian pathways.
- Uninterrupted Health Care Services – Ensures that PSJHC remains in continuous operation as a hospital and health care facility during development of the Phase II facilities.
- Phasing Objectives – Includes a schedule for Phase II development that will allow PSJHC to construct its Phase II Project buildings and related circulation, infrastructure and open space improvements in stages. This would ensure that: (i) PSJHC health care and related services continue without interruption; (ii) PSJHC circulation, infrastructure and open space improvements are coordinated with the construction of Phase II Project buildings; and (iii) PSJHC provides sufficient parking to meet its peak parking demand at all stages of Phase II development. It would also allow PSJHC sufficient time to raise the necessary funds to proceed.

Objective 4: Mobility and Circulation

- Develop and implement a comprehensive circulation plan for vehicles, bicycles and pedestrians that integrates PSJHC Campus circulation with circulation in the surrounding area.
- Provide effective and convenient connections for all transportation users (vehicles, bicycles, and pedestrians) between the uses and buildings constructed under Phase I and proposed under the Phase II Project.
- Ameliorate impacts on surrounding streets by adding new driveways and/or streets on the South Campus to provide access to underground parking.
- Create a vibrant pedestrian environment and protect residents on 21st Street from cut-through vehicular traffic by converting a portion of 21st Street to a "living street" that is dedicated to pedestrians while maintaining emergency vehicle access.
- Ameliorate impacts on all modes of transportation around and to/from the Campus, including the bicycle lanes on Broadway.

- Create a bicycle-friendly Campus by providing convenient access to/from the Campus, including connections to the existing bicycle lanes in the surrounding area, and dispersing bicycle parking throughout the Campus.

Objective 5: Parking

- Ensure that PSJHC continues to provide sufficient vehicular parking to meet PSJHC peak parking demand at all times.
- Ensure that PSJHC parking supply is based upon periodic reassessments of PSJHC peak parking demand and is "right-sized" based upon such reassessments.
- Provide ample on-site bicycle parking and storage for employees, patients and visitors.

Objective 6: Minimize Vehicle Miles Traveled – Minimize vehicle miles traveled (VMT) by implementing a comprehensive Transportation Demand Management (TDM) program for both Phase I and the Phase II Project. The TDM program includes incentives for alternative transportation (public transportation, bicycling and walking), ride sharing, flexible work hours and possibilities for remote work that reduce peak hour trips, and health care and supporting uses placed in close proximity to each other so as to reduce vehicle trips between various health care providers.

Objective 7: Minimize Phase II Impacts – Ensure that the Phase II Phasing Plan and schedule minimize impacts on PSJHC neighbors and PSJHC existing uses/facilities to the extent feasible.

5.3 Alternatives Selected for Analysis

As described above, according to CEQA Guidelines Section 15126.6 (a) the purpose of analyzing project alternatives is to identify alternatives that "…*would avoid or substantially lessen any of the significant effects of the project."* According to Section 15126.6(e) an EIR alternatives analysis should include the analysis of a No Project Alternative to allow decision makers to compare the impacts of approving a proposed project with the impacts and foreseeable future of not approving that project.

As indicated in Chapter 4.0 Environmental Analyses of this EIR, Project impacts would be less than significant or less than significant with mitigation incorporated for the majority of the environmental topics evaluated, with significant unavoidable adverse air quality, historical resources, neighborhood effects, and traffic impacts on intersections and street segments. The alternatives evaluated in this chapter have been formulated to reduce the magnitude of the Project's environmental impacts and inform the decision-making process. The five alternatives analyzed include:

- Alternative 1 – No Project/No Build
- Alternative 2 – Tier 1 Only
- Alternative 3 – Reduced Healthcare Uses with Tier 2 Housing on South Campus
- Alternative 4 – Reduced Master Plan
- Alternative 5 – Partial Master Plan

Alternative 1, No Project/No Build, is required pursuant to Section 15126.6(e) of the CEQA Guidelines, and represents a scenario where the Project is not implemented and there are no changes in the physical conditions on the Project Site. Alternative 2, Tier 1 Only, includes the amount of development permitted by the existing HMU and MUBL zoning without the exceedances in the base height, density, and floor area permitted by the LUCE for projects that provide community benefits (e.g., Tier 2 projects). Alternative 3, Reduced Healthcare Uses with Tier 2 Housing on South Campus, provides for reduced Phase II Master Plan's healthcare improvements on the North Campus and increased housing on the South Campus. Alternative 4, Reduced Master Plan, provides for reduced Phase II Master Plan improvements on both the North and South Campus. Alternative 5, Partial Master Plan, provides for implementation of only some phases of the Phase II Master Plan. **Table 5-1**, *Alternatives Development Summary*, provides a summary of the total floor area and number of dwelling units each of the alternatives. **Table 5-2**, *Alternatives Net Trip Generation Comparison*, compares the estimated net increase motor vehicle trip generation during operation of each of the alternatives. Both of these tables serve as inputs to the environmental analysis later in this chapter.

TABLE 5-1
ALTERNATIVES DEVELOPMENT SUMMARY

Alternative	Nature of Alternative	Development (e.g., Bldg. Floor Area)[a,b]		Maximum Building Height
		Gross	Net	
Proposed Project	Proposed Project	682,700 sf (includes 44 du)	571,945 sf (includes 44 du)	105 ft
Alternative 1 - No Project/No Build	Baseline (required by CEQA)	110,055 sf (includes 10 vacant du)	110,055 sf (includes 10 vacant du)	--
Alternative 2 - Tier 1 Only	Reduced density	510,450 sf (includes 25 du)	400,395 sf (includes 25 du)	45 ft
Alternative 3 - Reduced Healthcare Uses w/Tier 2 Housing on South Campus	Alternative land use mix	809,650 sf (includes 247 du)	699,595 sf (includes 247 du)	105 ft
Alternative 4 - Reduced Master Plan	Reduced density	557,500 sf (includes 44 du)	447,445 sf (includes 44 du)	70 ft
Alternative 5 - Partial Master Plan	Reduced density	357,600 sf (includes 10 du)	247,545 sf (includes 10 du)	95 ft

[a] Excludes structured parking.
[b] Because the 10 existing du on the Project Site are currently vacant, they are not counted as existing du in the net development estimates for the Project and each of the alternatives. This provides a conservative analysis.

SOURCE: ESA, 2019.

TABLE 5-2
ALTERNATIVES NET TRIP GENERATION AREA COMPARISON

Alternative	Weekday Trips[a]	AM Peak Hour Trips[a]			PM Peak Hour[a]		
		In	Out	Total	In	Out	Total
Proposed Project							
Net New Trips	9,826	421	220	641	282	472	754
Alternative 1 - No Project/No Build							
Net New Trips	0	0	0	0	0	0	0
% Change: Alt vs Project	-100%	-100%	-100%	-100%	-100%	-100%	-100%
Alternative 2 - Tier 1 Only							
Net New Trips	8,187	362	181	543	232	399	631
% Change: Alt vs Project	-17%	-14%	-18%	-15%	-18%	-15%	-16%
Alternative 3 - Reduced Healthcare Uses w/Tier 2 Housing on South Campus							
Net New Trips	11,236	415	302	717	360	484	844
% Change: Alt vs Project	+14%	-1%	+37%	+12%	+28%	+3%	+12%
Alternative 4 - Reduced Master Plan							
Net New Trips	8,359	364	187	551	237	404	641
% Change: Alt vs Project	-15%	-14%	-15%	-14%	-16%	-14%	-15%
Alternative 5 - Partial Master Plan							
Net New Trips	6,042	271	133	404	168	301	469
% Change: Alt vs Project	-39%	-36%	-40%	-37%	-40%	-36%	-38%

[a] See the Traffic Impact Analysis (TIA), included as Appendix L of this EIR, for detailed trip generation calculations for Alternatives 2 through 5.

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, 2019.

5.4 Alternatives Considered and Rejected

As discussed above, the State *CEQA Guidelines* Section 15126.6(c) recommends that an EIR identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the State *CEQA Guidelines*, the following factors may be used to eliminate alternatives from detailed consideration: the alternative's failure to meet most of the basic Project Objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives that have been considered and rejected as infeasible are discussed below.

5.4.1 Alternative On-site Uses

The Project Site is currently developed with healthcare and medical related, parking, and vacant residential uses within the Providence Saint John's Health Center (PSJHC) campus. Development of the Project Site with alternative (non-medical) uses would be inconsistent with multiple plans and agreements (LUCE, HASP, City of Santa Monica Zoning Ordinance, and PSJHC's 1998 DA and subsequent amendments). It would also be inconsistent with all of the Applicant's objectives for the Project, and could risk the viability of Saint John's Hospital and the balance of the Phase I

improvements recently completed at the PSJHC Campus that depend on the Phase II uses to operate. Therefore, the replacement of all of the existing uses at the Project Site with alternative (non-medical) uses is considered infeasible. However, this section of the EIR does analyze Alternative 3, which would develop much of the South Campus with housing in lieu of medical-related uses.

5.4.2 Development at an Alternative Site

State *CEQA Guidelines* Section 15126.6(f)(2) provides guidance regarding consideration of one or more alternative location(s) for a proposed project, stating that putting the project in another location should be considered if doing so would allow significant effects of the project to be avoided or substantially lessened. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. If no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion.

The Project would develop medical and healthcare related uses at the Phase II portion of the PSCHC Campus. The development of these Phase II uses at an alternative site would be inconsistent with multiple plans and agreements (LUCE, HASP, City of Santa Monica Zoning Ordinance, and PSJHC's 1998 DA and subsequent amendments). Development of these Phase II uses at another location would also: (1) be inconsistent with several of the Applicant's objectives for the Project (most importantly, Objective 1, ensure that PSJHC will function as part of an integrated health services delivery system); and (2) could risk the viability of Saint John's Hospital and the balance of the Phase I improvements recently completed at the PSJHC Campus that depend on the Phase II uses to operate. Furthermore, while the development of the Project at an alternative site in the City could potentially avoid the significant unavoidable adverse historical resource and vibration impacts of the Project, it would likely not avoid or substantially lessen most of the other impacts of the Project, especially those driven by the type and amount of development (e.g., air quality, noise, public services, vehicle trips, and utilities). Therefore, the development of the Project at an alternative site would be infeasible.

5.4.3 Alternate Circulation Plan

The current circulation plan presented in this EIR for the Phase II Master Plan represents a plan that has been developed by the project Applicant to address initial City comments, specifically from the City's Mobility Division. Early during the concept review and application process for the Phase II Master Plan, the applicant presented an original circulation plan to City Council in December 2016. The prior circulation plan had two two-way north/south streets on the South Campus (20th Place[1] and 22nd Street) providing through vehicle access between Santa Monica Boulevard and Broadway. This proposal included two new stop lights on Broadway, one at the intersection of the new 20th Place and one at the intersection of the new 22nd Street. The prior circulation plan had Saint John's Way and 21st Street (with the northern part vacated) as currently proposed.

[1] Under the current proposal, South Campus West Driveway would provide two way north south access for vehicles from Santa Monica Boulevard to S3 and 20th Place would provide one way southbound travel from S3 to Broadway. South campus East Driveway would provide two way north/south access for vehicles form Santa Monica Boulevard to S4. Southeast Driveway would be two way from Broadway to S2.

The City's Mobility Division expressed concerns about the potential adverse effects on bicycle flow and safety along Broadway. Broadway is the City's primary backbone/path of travel for bicyclists traveling east to west. The anticipated volume of Project vehicles entering due to vehicles entering and exiting from the two new driveways of 20th Place and 22nd Street would present new points of conflicts between vehicles and bicyclists. Therefore, at the request of City staff, the project Applicant modified the circulation plan to ensure that 20th Place and Southeast Driveway as currently proposed in the Master Plan.

Due to bicycle concerns as well as inconsistency with the City's Bike Action Plan goal to maintain Broadway as an important east-west bicycle corridor, the 2016 alternate circulation plan was rejected and not considered for further study in this EIR.

5.5 Analysis Format

In accordance with State CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project objectives would be substantially attained by the alternative. The evaluation of each of the alternatives includes the following components:

- A description of the alternative.
- The environmental impacts of the alternative for each environmental issue area are described.
- Where the impact of the alternative would be clearly less than the impact of the Project, the comparative impact is said to be "less." Where the alternative's net impact would clearly be more than the Project, the comparative impact is said to be "greater." Where the impacts of the alternative and Project would be roughly equivalent, the comparative impact is said to be "similar.".
- The comparative analysis of the impacts is followed by a general discussion of the extent to which the Project Objectives could be attained by the alternative.

At the end of this chapter, a table presenting a comparison of impacts between each of the alternatives and the Project is provided, and pursuant to CEQA Guidelines Section 15126.6(e)(2), an "Environmentally Superior Alternative" is identified.

5.6 Impact Analysis of the Alternatives

5.6.1 Alternative 1 – No Project/No Build Alternative

5.6.1.1 Description of the Alternative

Per CEQA Guidelines Section 15126.6(e)(2), the No Project/No Build Alternative analysis discusses the existing conditions at the time the Notice of Preparation (NOP) was published (April 7, 2017) and compares impacts of the No Project/No Build Alternative to the Project. Under the No Project/No Build Alternative, the Project would not be developed. Rather, the existing on-site uses (e.g., hospital/healthcare, medical research, medical office, laboratory, day care, office and vacant residential totaling 110,055 square feet of floor area, along with the existing entry plaza and

surface parking) would remain unchanged. Additionally, the street network would remain unchanged – no new streets, driveways, or pedestrian connections would be constructed within the PSJHC Campus, and the northern portion of 21st Street would not be vacated. Existing utilities infrastructure would remain in their place and would not be relocated. Figures 2-1 and 2-2 in Chapter 2, *Project Description*, shows the existing uses at the Project Site and the boundaries of the Project Site (including the boundaries of each of the Phase II Development Sites). **Table 5-3**, *Alternative 1 (No Project/No Build) - Development Summary*, provides a breakdown of the existing on-site uses under this alternative.

5.6.1.2 Environmental Impacts

Aesthetics

The following aesthetics analysis regarding views, scenic resources, light and glare, and shading is provided for informational purposes only, since impacts are less than significant for employment projects within urban areas, pursuant to PRC Section 21099(d)(1). See Section 4.1, *Aesthetics*, of this EIR for further discussion of PRC Sections 21099(d)(1) and (d)(2)(A).

Under Alternative 1, the existing on-site buildings totaling 110,055 square feet of floor area and up to two stories in height, along with the existing surface parking and entry plaza area, would be retained. These uses would not be demolished and replaced with up to 682,700 square feet of new similar use floor area of up to six stories in height, structured parking, plaza entry area, open space, pedestrian connections, and additional landscaping and street trees. The Project Site would continue to reflect its current conditions and character as lower density medical/healthcare, medical office, laboratory, childcare, surface parking and entry plaza use, and no intensification of uses at the Project Site would occur. Pursuant to PRC Section 21099(d)(1), Alternative 1 would have no impacts on scenic vistas, scenic resources, light/glare, and shading.

Alternative 1 would not require any amendments to plans and agreements (LUCE, HASP, City of Santa Monica Zoning Ordinance, and PSJHC's 1998 DA and subsequent amendments) that govern scenic quality. As such, Alternative 1 would not result in any inconsistencies with the existing zoning or other regulations that govern visual character. Impacts related to aesthetics would be less than significant and, therefore, would be less than those of the Project.

Air Quality

Construction Emissions

Under Alternative 1, the existing on-site uses would be retained. No construction activity, and thus no associated construction air emissions would occur. Since Alternative 1 would have no impacts, the level of impacts would be less than the Project under this alternative.

TABLE 5-3
ALTERNATIVE 1 (NO PROJECT/NO BUILD) - DEVELOPMENT SUMMARY

Development Site	Uses	Existing Improvement	Building Floor Area/units	Height
2C	Surface parking for visitors and patients	West Parking Lot and landscape	n/a	n/a
2I	Day care Child & Family Development Center Use	Child & Family Development Center	34,670 sf	2 Above-Grade Stories, 1 basement level
	Maintenance and storage	CFDC Poolhouse	585 sf	1 Above-Grade Story
2D/E	Office/meeting space for Saint John's Foundation	Saint John's Health Center Foundation Building ("2221 Building") and related surface parking	10,800 sf	2 Above-Grade Stories
	Surface parking for physicians	Parking Lot C	n/a	n/a
Mullin Plaza Site	Entry plaza/vehicle drop-off/pick-up/open space	Entry plaza/vehicle drop-off/pick-up/open space	n/a	n/a
S1/S3	Imaging	Temporary MRI Buildings	2,675 sf	1 Above-Grade Story
	Surface parking for visitors and patients	Parking Lot B	n/a	n/a
	Surface parking for employees/staff	Parking Lot I	n/a	n/a
S2	Surface parking for employees/staff	Parking Lot H (portion)	n/a	n/a
S4 and Saint John's Square	Medical Research, including clinics, laboratories, offices, and meeting space	John Wayne Cancer Institute ("2200 Santa Monica Boulevard")	51,055 sf	2 Above-Grade Stories, 1 Subterranean Level
	Multifamily dwelling units (Vacant)	10-unit Apartment Building ("1417-1423 Twenty-First Street")	10,270 sf (10 vacant du)	2 Above-Grade Stories
	Surface parking for employees/staff	Parking Lot H (portion)	n/a	n/a
S5	Surface parking for employees/staff	Parking Lot H (portion)	n/a	n/a
		TOTAL	**110,055 sf (includes 10 vacant du)**	

Source: ESA, 2019.

Operational Emissions

Under Alternative 1, the existing on-site uses would be retained. No net increase in operational activity or vehicle trips, and thus no associated net increase in operational air emissions would occur. Since Alternative 1 would have no impacts, impacts would be less than the Project's significant unavoidable impacts (related to regional NO_x emissions).

Construction Effects

Under Alternative 1, no new uses would be developed at the Project Site – the Project Site would remain with the existing PSJHC hospital/healthcare, medical research, day care, office and vacant residential uses. No construction activities would occur. Since Alternative 1 would include no construction activities and generate no construction-related aesthetics effects, air emissions, noise/vibration, or vehicle trips, no construction impacts would occur. Since Alternative 1 would

have no impacts, impacts would be less than the less than significant construction-related aesthetics, air quality (after mitigation), noise, and traffic impacts that would occur under the Project. Also, the No Project Alternative would avoid the Project's significant and unavoidable construction-related vibration impacts to sensitive medical uses.

Historical Resources

Three historical resources were identified through the course of analysis for this Project. The John Wayne Cancer Institute and CFDC appear eligible for federal, state, and local listing as individual properties, and also appear to be contributors to a potential historic district, and as such meet the definition of historical resources as outlined in CEQA Guidelines Section 15064.5(a). Additionally, there are four historical resources that would have direct or indirect views of the Project site (Santa Monica Doctors Office at 2125 Arizona Avenue, a corner commercial building at 2301 Santa Monica Boulevard, Kingsley Gates Mortuary at 1925 Arizona Avenue, and McKinley Grammar School at 2401 Santa Monica Boulevard). These four resources are eligible for local listing, and as such meet the definition of historical resources as outlined in CEQA Guidelines Section 15064.5(a).

The Project would: (1) not indirectly impact off-site historical resources; (2) result in less than significant vibration impacts to on-site historic buildings after mitigation; and (3) demolish the John Wayne Cancer Institute and CFDC buildings which would constitute a significant unavoidable impact. Under Alternative 1, the existing on-site uses would be retained, no new development would occur, and none of the above impacts would occur. Since Alternative 1 would have no impacts, its impacts would be less than Project.

Archaeological Resources

Under Alternative 1, no new development would occur at the Project Site. No excavation, grading, or groundbreaking activities would occur. Therefore, there would be no potential to encounter archaeological resources or human remains at the Project Site. Since Alternative 1 would have no impacts, impacts would be less than the less than significant impacts after mitigation that would occur under the Project.

Energy

Under Alternative 1, the Project would not be developed. The Project Site would remain with its current hospital/healthcare, medical research, laboratory, day care, office, and vacant residential uses with no construction activities and no increase in building square footage, operational activities, or vehicle trips. There would be no increase in energy consumption from construction activities or new land uses, and no energy impacts energy would occur. Alternative 1 would not result in the wasteful, inefficient or unnecessary consumption of energy, or conflict with or obstruct implementation of a plan for renewable energy or energy efficiency. Still, since Alternative 1 would have no impacts, as compared to the less than significant impacts under the Project, the level of impacts would be less under Alternative 1. It is noted, however, that the sustainable design features proposed under the Project (including placing dense and diverse mix of uses in close proximity to transit) would not be implemented under this alternative, and the reduction in VMT per capita that would occur under the Project would not occur.

Geology and Soils

Under Alternative 1, the existing on-site uses would be retained and the Project Site would not be further developed. No impacts related to fault rupture, strong seismic ground shaking, seismic-related ground failure (including liquefaction), landslides and slope stability, lateral spreading, subsidence, differential settlement (including collapse), expansive soils, or erosion would occur since there will be no demolition, grading, or construction. Alternative 1 would not cause or exacerbate existing geologic/soil conditions that could pose a threat to public safety. However, the older existing on-site buildings would also not be replaced with modern buildings constructed to the latest building code and seismic safety standards that would occur under the Project. Still, since Alternative 1 would have no impacts, its impacts would be less than the less than significant impacts of the Project.

There are no unique geologic features at the Project Site. Under Alternative 1, no new development would occur at the Project Site. No excavation, grading, or groundbreaking activities would occur. Therefore, there would be no potential to encounter paleontological resources at the Project Site. Since Alternative 1 would have no impacts, impacts would be less than the Project's less than significant impacts after mitigation.

Greenhouse Gas Emissions

Under Alternative 1, the existing on-site uses would be retained and the Project Site would not be further developed. There would be no greenhouse gas emissions (GHGs) from construction activities or the operation of new land uses, and there would be no potential to be inconsistent with applicable GHG emission reduction plans (e.g., LUCE, Sustainable City Plan, SCAG 2016 RTP/SCS, Climate Action Plan, AB 32, AB 375, etc.). No impacts associated with GHG emissions would occur. Since Alternative 1 would have no impacts, its impacts would be less than the Project's less than significant impacts.

Hazards and Hazardous Materials

Under Alternative 1, the existing on-site uses would be retained and the Project Site would not be further developed. Therefore, there would be no demolition or excavation activities that could potentially release hazardous materials (e.g., ACMs, LBP, etc.) to the environment, no hazardous materials emissions near a school, no increase in the transport/use/storage/disposal of hazardous materials that could potentially result in upset and accident conditions, and no potential to impair/interfere with an adopted emergency response/evacuation plan. No impacts would occur. Since Alternative 1 would have no impacts, impacts would be less than the less than significant impacts after mitigation that would occur under the Project.

Hydrology and Water Quality

The Project Site is not bisected by a stream or river, and neither Alternative 1 nor the Project would modify the course of a stream or river. Therefore, neither the Project or Alternative 1 would result in flooding associated with the alteration of the course of a stream or river or conflict with or obstruct implementation of a water quality control plan. Alternative 1 would result in no physical changes while the Project would comply with all applicable water quality and groundwater

management plans (e.g., Basin Plan) and waste discharge requirements (e.g., City of Santa Monica Runoff Conservation and Sustainable Management Ordinance).

Under Alternative 1, the Project Site would remain in its existing condition. No change in hydrology and water quality conditions at the Project Site (e.g., pervious vs. impervious surfaces, drainage patterns, the rate and amount of surface runoff, the water quality of the surface runoff, the rate of erosion and siltation, etc.) would occur. Therefore, no hydrology and water quality impacts would occur. However, implementation of BMPs to retain and improve the quality of this stormwater runoff would not be implemented as it would be under the Project. Still, since Alternative 1 would have no impacts, impacts would be less than the Project's less than significant impacts after mitigation.

Land Use and Planning

Alternative 1 would not be inconsistent with land use plans adopted for the purpose of avoiding or mitigating environmental effects. At the same time, Alternative 1 would not provide certain land use benefits that would occur under the Project. It would not accommodate increased density in close proximity to mass transit within the City or contribute to a development pattern that supports reduced vehicle miles traveled per capita, both called for by the LUCE and 2016 SCAG RTP/SCS. It would also not provide for the provision of medical uses to serve the community as planned for in multiple City plans and agreements. Nevertheless, since Alternative 1 would have no impacts, versus the Project's less than significant impacts, it is conservatively concluded here that land use impacts would be less under this alternative.

Neighborhood Effects

Alternative 1 would not include additional development or associated construction and operational activities at the Project Site, and would not generate neighborhood effects. By comparison, the Project would result in a net increase of 571,945 square feet of floor area at the Project Site, and associated construction and operational activities that would generate a mix of less than significant, less than significant after mitigation, and significant unavoidable neighborhood effects (traffic) within the Mid-City neighborhood. Because Alternative 1 would have no impact, the level of impact would be less than under the Project.

Noise and Vibration

Construction

Under Alternative 1, the existing on-site uses would be retained and the Project Site would not be further developed. Therefore, no construction activities would occur, and no construction noise/vibration would be generated. Since Alternative 1 would have no impacts, construction noise impacts would be less than the Project. With respect to construction vibration impacts, Alternative 1 would avoid the Project's significant construction vibration impact on sensitive medical uses not owned/controlled by Saint John's that do not participate in Mitigation Measure NOISE-2.

Operation

Under Alternative 1, no new uses would be developed at the Project Site. No increases in noise or vibration levels as a result of new vehicle trips or stationary noise or vibration sources would occur.

Noise/vibration levels at the Project Site would remain consistent with existing noise/vibration levels. Since Alternative 1 would have no impacts, impacts would be less than the less than significant impacts under the Project.

Population and Housing

Alternative 1 would retain the existing on-site uses, while the Project would replace the existing on-site uses (including job-generation uses and housing) with new job-generating uses and housing, and would continue to employ most if not all of the existing on-site employees. Under Alternative 1, no new uses or infrastructure would be developed. There would be no increase in employment or population under Alternative 1. Accordingly, this alternative, like the Project, would not directly or indirectly induce substantial unplanned population growth in the area. At the same time, this alternative would not help the City meet its goals for providing medical uses to serve the community, create new housing units, create new job opportunities, or contribute to a land use pattern that supports a reduction in Citywide VMT, all of which would occur with implementation of the Project. Nevertheless, Alternative 1 would have no impacts, which would be less than the less than significant impacts of the Project.

Furthermore, the existing on-site housing is currently vacant. Therefore, neither the Project or Alternative 1 would displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere.

Police Protection

Under Alternative 1, the existing on-site uses would be retained, no new development would occur, and no additional police demand or vehicle trips would be generated. Therefore, police service demand and emergency response times would remain unaffected, and new or physically altered police protection facilities would not be required. Since Alternative 1 would have no impacts, impacts would be less than the less than significant impacts of the Project.

Fire Protection

Under Alternative 1, the existing on-site uses would be retained, no new development would occur, now additional vehicle trips would be generated, and no demand for additional fire flow would be created. Therefore, fire service demand and emergency response times would remain unaffected, and new or physically altered fire protection facilities would not be required. Since Alternative 1 would have no impacts, impacts would be less than the less than significant impacts that would occur associated with the Project.

Transportation

Under Alternative 1, the existing on-site uses would be retained and no new development would occur. No new vehicle trips would be added to the roadway network, including at intersections, street segments, and CMP designated freeway segments, and public transit facilities and local pedestrian and bicycle circulation would not be affected. Additionally, no changes to the street network would occur. Alternative 1 would have no impacts. This is compared to the Project that would have less than significant conflicts with circulation plans/programs/ordinances/policies, less than significant VMT and CMP (facility and transit) impacts, significant unavoidable intersection

and street segment operations impacts, less than significant hazards due to design features, and less than significant emergency access impacts. Alternative 1 would avoid these impacts, and thus the level of the impacts would be less under Alternative 1 than under the Project. It is noted, however, that Alternative 1 would not reduce regional VMT as would the Project, a goal in local and regional transportation plans, because it would not place density in proximity to transit.

Tribal Cultural Resources

No tribal cultural resources, as defined in PRC Section 21074, were identified as located on the Project Site during the tribal consultations required by AB 32. Therefore, the Project and Alternative 1 would not cause a substantial adverse change in the significance of tribal cultural resources, and no impact would occur under either development scenario.

Water Supply

Under Alternative 1, the existing on-site uses would be retained and no new development would occur. No new activity would occur, and there would be no increase in the demand for water or the use of local water conveyance infrastructure. Alternative 1 would not require new or expanded water infrastructure, the construction or relocation of which could cause significant environmental effects, and would not exceed available water supplies during normal, dry and multiple dry years. However, since Alternative 1 would have no impacts, impacts would be less than the Project's less than significant impacts after mitigation.

Wastewater

Under Alternative 1, the existing on-site uses would be retained and no new development would occur. As such, there would be no increase in wastewater generation and the demand for wastewater conveyance and treatment infrastructure capacity. Alternative 1 would not require the construction of or relocation of new or expanded wastewater infrastructure as it would be under the Project, the construction or relocation of which could cause significant environmental effects, nor would it result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the project. Since Alternative 1 would have no impacts, impacts would be less than the less than significant impacts after mitigation of the Project.

Solid Waste

Under Alternative 1, the existing on-site uses would be retained and no new development would occur. No additional solid waste would be generated requiring disposal at landfills. Neither Alternative 1 nor the Project would generate solid waste in excess of applicable standards or the capacity of local landfills, neither would impair attainment of solid waste reduction goals, and neither would be inconsistent with applicable solid waste management and reduction statutes and regulations. However, since Alternative 1 would have no impacts, impacts would be less than the less than significant impacts of the Project.

5.6.1.3 Relationship of the Alternative to the Project Objectives

Alternative 1 would retain the existing on-site uses, and no new development would occur. The Project Site would remain in its current condition (e.g., older medical, medical office, laboratory, childcare, entry plaza, and parking uses). This alternative would partially meet some of the Project

objectives (e.g., Objectives 1 – Health Care and Related Uses and Facilities, and 2 – Child Care) by continuing to provide some health care services to the community and some support to PSJHC in functioning as part of an integrated health services delivery system. However, it would not do so as effectively as the Project because it would not provide the latest (e.g., state-of-the-art) acute care, ambulatory care, medical research, and education and conferencing facilities to the community. Furthermore, other Project objectives (e.g., Objectives 2 – Replacement Housing, 3 – Phase II Master Plan and Development Program, 4 – Mobility and Circulation, 5 – Parking, and 6 – Minimize VMT) would not be met. Overall, Alternative 1 would be less effective than the Project in meeting the Project objectives.

5.6.2 Alternative 2 – Tier 1 Only

5.6.2.1 Description of the Alternative

Alternative 2 assumes development of the Phase II Development Sites with healthcare and related uses for PSJHC in accordance with the sites' underlying zoning at the maximum Tier 1 densities and heights. All of the sites at the PSJHC Campus are zoned HMU, except for the MUBL (a portion of the Site S5). Uses on the HMU site would be consistent with the Zoning Ordinance's permitted uses in the HMU district including Hospital and Clinic, Medical Office, Research and Development, Child Care and Early Education Facilities, Restaurant and General Retail Sales, Small-Scale. Uses on the MUBL site would be consistent with the Zoning Ordinance's permitted uses in the MUBL district including Residential Multiple-Unit Structures and Restaurants.

The on-site open space would also be significantly reduced. In contrast to the Project, this alternative would not require the relocation of existing utilities. In addition, the existing street network would remain as is. There would be no new streets such as 20th Place and Saint John's Way, and the northern portion of 21st Street would not be vacated. Instead, site access would be directly from the streets adjacent to the Phase II sites. Furthermore, the below-grade tunnels connecting parking garages and above-grade pedestrian connections over Santa Monica Boulevard would not be constructed.

Under Alternative 2, Phase II programs would be provided in new buildings that comply with the Tier 1 density and height consistent with each site's underlying zoning. As previously stated, the PSJHC is zoned HMU, except for the small parcel at the northeast corner of Broadway and 21st Street which is zoned MUBL. The Tier 1 standards for the HMU district are 1.5 FAR, and 45 feet (3 stories) in height and the Tier 1 standards for the MUBL district are 1.5 FAR and 36 feet (3 stories). The total floor area available for Phase II uses would be reduced by about 110,000 square feet as a result of the Tier 1 height and density limitations. In addition to reducing the total floor area available for development of healthcare uses, Alternative 2 would not include an Education and Conference Center, Visitor Housing, Saint John's Café or Mullin Plaza Café. The development at the Project Site under this alternative is specified further in **Figure 5-1** and **Table 5-4**, and is discussed further below. As indicated therein, this alternative would include 510,450 square feet of new floor area (including 25 du), or a net increase of 400,395 square feet (including 25 du).

Alternative 2 would not exceed the development rights vested to PSJHC by the City in the 1998 DA of 799,000 total for Phase II development (with a max. of 744,000 square feet above-grade).

However, Alternative 2 would also require amendments to the DA to extend the Phase II vested rights. Furthermore, Alternative 2 would also require amendments to the Phase II Master Plan.

Site 2I:

Alternative 2 would develop Site 2I, which is approximately 45,000 square feet in area. Similar to the project, Alternative 2 would demolish the existing Child & Family Development Center and develop a medical office building. Per the Tier 1 standards with a maximum FAR of 1.5, this alternative assumes 4,500 square feet of ground floor General Retail Sales, Small-Scale and 63,000 square feet of Medical Office uses. The maximum floor area of the building would be 67,500 square feet. The maximum height of the building would be 45 feet (three floors) and there would be up to four levels of subterranean parking. Site access to Site 2I would be the same as the Project (from 20th Street).

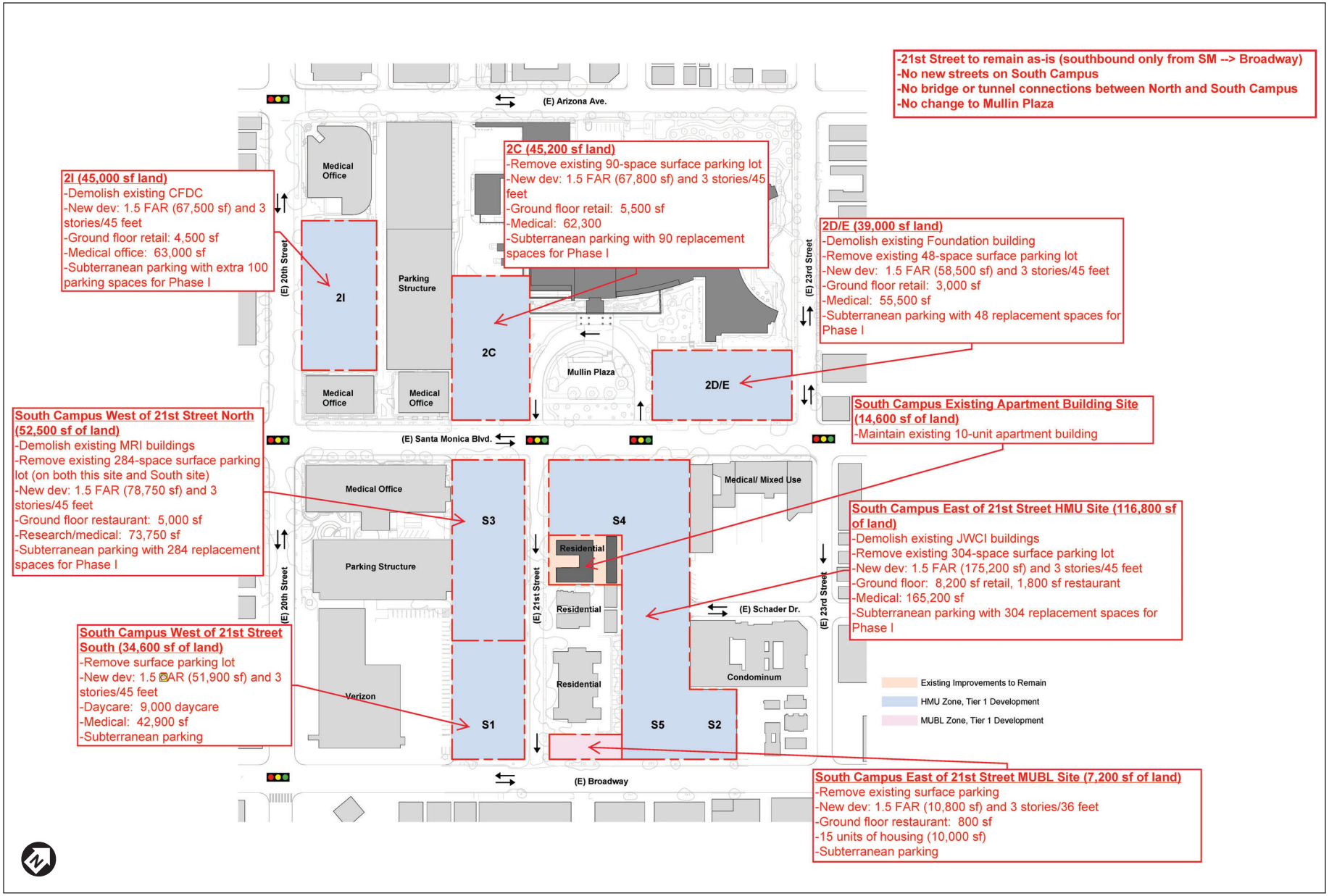
Site 2C:

Similar to the Project, Alternative 2 would remove the existing surface parking (West Lot) and landscaping in the North Campus and construct a three-story medical building with subterranean parking on the approximately 45,200-square-foot 2C site. The 2C medical building would contain 62,300 square feet of Hospital and Clinic and/or Research and Development uses and 5,500 square feet of ground-level General Retail Sales, Small-Scale. The maximum floor area of the building would be 67,800 square feet. The maximum building height would be 45 feet (three floors). There would be up to four levels of subterranean parking beneath the 2C site. Unlike the Project, the Mullin Plaza egress driveway would remain at its current location (and would not be rerouted through the 2C site). Vehicular access to the 2C site would be provided through both the existing Mullin Plaza driveway and potentially a new curb cut on Santa Monica Boulevard on the 2C site.

Sites 2D/E and Mullin Plaza:

The land area of Site 2D/E in the North Campus is approximately 39,000 square feet in area. The development program for Site 2D/E includes the demolition of the single-story Saint John's Foundation office building at 2221 Santa Monica Boulevard, and the existing surface parking lot, followed by the construction of a three-story medical building and associated subterranean parking.

The 2D/E medical building would include 55,500 square feet of Hospital and Clinic and/or Research and Development uses and 3,000 square feet of ground floor General Retail Sales, Small-Scale. The maximum floor area of the building would be 58,500 square feet above-grade. The maximum height of the building would be 45 feet (three floors). The 2D/E medical building would have a larger footprint compared with the East Ambulatory & Acute Care Building proposed in the Project in order to accommodate 58,500 square feet of floor area for healthcare uses in the 45-foot height limit. As a result, the Mullin Plaza would not be expanded onto Site 2D/E as the Project proposes.



SOURCE: Perkins Eastman, October 2018

Providence Saint John's Health Center Phase II Project

Figure 5-1
Alternative 2 – Tier 1 Only

ESA

TABLE 5-4
ALTERNATIVE 2 (TIER 1 ONLY) - DEVELOPMENT SUMMARY

Development Site	Uses	Floor Area/Units per Use	Max. Building Floor Area	Max. Height
2I	Medical Office	63,000 sf	67,500 sf	45 feet (3 floors)
	General Retail Sales, Small-Scale	4,500 sf		
	Up to four levels of subterranean parking			
2C	Hospital and Clinic Research and Development	62,300 sf	67,800 sf	45 feet (3 floors)
	General Retail Sales, Small-Scale	5,500 sf		
	Up to four levels of subterranean parking			
2D/E	Hospital and Clinic, Research and Development	55,500 sf	58,500 sf	45 feet (3 floors)
	General Retail Sales, Small-Scale	3,000 sf		
	Up to four levels of subterranean parking			
South Campus West of 21st Street South S1	Hospital and Clinic (Child & Family Development Center)	42,900 sf	51,900 sf	45 feet (3 floors)
	Child Care and Early Education Facilities	9,000 sf – 15,000 sf		
	Up to five levels of subterranean parking			
South Campus West of 21st Street North S3	Hospital and Clinic or Research and Development	73,750 sf	78,750 sf	45 feet (3 floors)
	Restaurant	5,000 sf		
	Up to five levels of subterranean parking			
South Campus East of 21st Street S2, S4, S5 excluding MUBL Site and existing Multi-Family Housing	General Retail Sales, Small-Scale Restaurant	10,000 sf	175,200 sf	45 feet (3 floors)
	Hospital and Clinic or Research and Development	165,200 sf		
	Up to five levels of subterranean parking			
Existing Housing Site	Residential Multiple-Unit Structures (Multi-Family Housing)	10 du (existing to remain)	Existing floor area to remain	Existing height to remain
MUBL Site	Residential Multiple-Unit Structures (Multi-Family Housing)	10,000 sf (15 du)	10,800 sf	36 feet
	Restaurant	800 sf		
	Up to two levels of subterranean parking			
		TOTAL (GROSS)	**510,450 sf (includes 25 du)**	
		TOTAL (NET)	**400,395 sf (includes 25 du)**	

SOURCE: PSJHC, 2019

There would be up to four levels of subterranean parking beneath Site 2D/E. As compared to the Project, the Tier 1 Alternative would provide less open space area because the existing Mullin Plaza would not be expanded onto the Site 2D/E and the open space on the North Campus would remain in place. Additionally, there would be no 1,500 square feet Mullin Plaza Café. Vehicular access to the 2D/E site would likely be provided through both the existing Mullin Plaza driveway and a modified curb cut on 23rd Street.

South Campus West of 21st Street South (S1)

Alternative 2 would remove the existing surface parking lot and develop approximately 34,600 square feet of property located in the southern portion of the South Campus west of 21st Street (i.e., generally the S1 site) at the Tier 1 standards. Based on the Tier 1 FAR of 1.5, this area would be developed with a maximum 51,900 square feet of uses consisting of a 9,000-15,000 square feet Child Care and Early Education Facilities with the remaining area for the Child & Family Development Center (a Hospital and Clinic use) with a maximum floor area of 42,900. Similar to the Project, enrollment priority for the Child Care use would be (1) children of PSJHC employees, (2) children of Santa Monica residents and (3) children of those working in Santa Monica. The maximum building height would be 45 feet (three floors). Similar to the Project, a subterranean parking garage with up to five levels of underground parking would be provided. Unlike the Project, site access to Site S1 would be provided directly from either or both 21st Street or Broadway.

South Campus West of 21st Street North (S3)

The northern portion of the South Campus west of 21st Street includes the existing temporary MRI Building and existing surface parking lot comprising approximately 52,500 square feet of land area. Alternative 2 would demolish these uses and replace them in a new Tier 1 building with 73,750 square feet of Hospital and Clinic and/or Research and Development uses and 5,000 square feet of ground floor Restaurant. The maximum floor area would be 78,750 square feet. As compared to the Project, this area would have a reduction in healthcare/research uses. The maximum building height would be 45 feet (three floors). Similar to the Project, a subterranean parking garage with up to five levels of underground parking would be provided. Unlike the Project, site access to the S3 site would be provided directly from either or both 21st Street and Santa Monica Boulevard.

South Campus East of 21st Street (S2, S4, and S5 excluding MUBL Site and existing housing site)

Alternative 2 would develop approximately 116,800 square feet of property within the South Campus, generally encompassing Sites S2, S4, and S5 (excluding the MUBL site and existing 10-unit vacant multifamily housing site at 1427-1433 21st Street.). Alternative 2 would demolish the existing John Wayne Cancer Institute building and surface parking. Per the Tier 1 standards, Alternative 2 would thus develop a total of 175,200 square feet, consisting of 10,000 square feet of ground floor General Retail Sales, Small-Scale (8,200 square feet) and Restaurant uses (1,800 square feet), and 165,200 square feet of Hospital and Clinic and/or Research and Development uses. The maximum building height would be 45 feet (three floors).

In comparison to the Project, Alternative 2 would have the same amount of ground floor General Retail Sales, Small-Scale and Restaurant uses with the remaining square footage dedicated to

Hospital and Clinic and/or Research and Development uses. Due to the Tier 1 height limitation of 45 feet under this alternative, the Education and Conference Center would not be developed. Due to the Tier 1 FAR limit of 1.5, there would be a significant reduction in space available for healthcare uses. Additionally, there would be no Visitor Housing under the Tier 1 Alternative as visitor housing is not a permitted use in the Zoning Ordinance.

As compared to the Project, the Tier 1 Alternative would provide significantly less open space area. There would be no Saint John's Square along Santa Monica Boulevard or the 900- square-foot Saint John's Café with outdoor dining. Additionally, this alternative would not include the Project's proposed Sun Garden open space located approximately in the middle of the site adjacent to the existing residential uses to the east (1440 23rd Street condominiums) and west of the site (1423 21st Street apartments and Geneva Plaza senior housing building). The alternative would also not include the Project's proposed open space on the northern portion of Site S2 (adjacent to the 1440 23rd Street condominiums) or the South Garden open space located along Broadway.

Similar to the Project, a subterranean parking garage with up to five levels of underground parking would be provided. Unlike the Project, site access to Sites S2, S4 and S5 would be provided directly from both Santa Monica Boulevard and Broadway.

South Campus East of 21st Street MUBL Site

Unlike the Project (where the MUBL site is not developed and is instead improved with the South Garden open space), the Tier 1 Alternative would remove the existing surface parking located on the approximately 7,200 square feet MUBL site and replace it with a Tier 1, 10,000-square-foot mixed-use multi-family housing building with 15 units of housing (a Residential Multiple-Unit Structures use), 800 square feet of ground floor Restaurant uses, and up to two levels of subterranean parking. The maximum building height would be 36 feet (three floors). Unlike the Project, site access to the MUBL site would be from directly from 21st Street or Broadway.

South Campus Existing Housing Development Site/1417-1423 21st Street

Unlike the Project (where the existing, vacant multi-family apartment building at 1417-1423 21st Street is demolished and rebuilt on the S2 site to allow for Saint John's Square and the S4 building), the Tier 1 Alternative would retain the existing 10-unit multifamily apartment building at 1417-1423 21st Street and the existing building would be remodeled and occupied. Unlike the Project, site access to 1417-1423 21st Street would continue to occur from 21st Street.

5.6.2.2 Environmental Impacts

Aesthetics

The following analysis pertinent to scenic vistas, scenic resources, light and glare, and shading is provided for informational purposes only, since impacts are less than significant for employment projects within urban areas, pursuant to PRC Section 21099(d)(1). See Section 4.1, *Aesthetics*, of this EIR for further discussion of PRC Sections 21099(d)(1) and (d)(2)(A).

Would the project have a substantial adverse effect on a scenic vista?

As described in Section 4.1, due to distance and intervening topography, views of the Pacific Ocean are limited from east to west corridors along Santa Monica Boulevard, Broadway, and Arizona Avenue near the Project Site. Limited views of the Santa Monica Mountains to the north are available from north and south corridors such as 23rd Street and 20th Street adjacent to the Project Site. There are no protected views or view corridors within the Project area and no scenic vistas across the Project Site.

Alternative 2 would include less development and lower building heights than the Project, such that development under Alternative 2 would be slightly less noticeable from public vantage points. Furthermore, in contrast to the Project, Alternative 3 would not include a pedestrian bridge across Santa Monica Boulevard. As previously stated, there are no protected views or view corridors within the Project area and no scenic vistas of the Santa Monica Mountains to the north or the Pacific Ocean to the west currently exist across the Project Site. Furthermore, there are no public parks, scenic overlooks, scenic highways, or other public gathering places in the immediate vicinity of the Project Site that have views of the mountains and Pacific Ocean that could be impacted by development at the Project Site. Therefore, neither the Project or Alternative 2 would have substantial adverse effects on scenic vistas, with the impact being similar under Alternative 2 due to the absence of scenic vistas in the Project area.

Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway or a locally-designated scenic corridor?

The Project Site located on or near a State scenic highway or locally-designated scenic corridor. Furthermore, while there are several off-site historic resources within the viewshed of the Project Site, neither development scenario would impact these resources or materially impact the setting in which these resources occur. Both the Project and Alternative 2 would remove two buildings eligible as local historic resources (e.g., John Wayne Cancer Institute and the Child & Family Development Center), which are considered excellent examples of Mid Century Modern architecture. However, the loss of these resources from an aesthetic perspective would be off-set to some degree under both projects by new construction exhibiting high quality architecture, landscape design, and increased open space. In accordance with 21099(d)(1)PRC 21099(d)(1), this impact is not identified as significant. Based on the above, the impacts of Alternative 2 would be similar to those of the Project.

Would the project conflict with applicable zoning and other regulations that govern scenic quality?

As indicated in Section 4.1, *Aesthetics*, although the Project would alter the visual character of the Project Site due to development of new buildings, open space, and infrastructure, the Project Site is already urbanized. As discussed in Section 4.1, the Project would be consistent with applicable zoning and other regulations that govern scenic quality including LUCE policies.

Alternative 2 would also develop new buildings on the various development sites. As with the Project, Alternative 2 would be subject to architectural design review by the Architectural Review

Board (ARB), in accordance with SMMC Section 9.55 (architectural review). Consistent with ARB review, findings will be made demonstrating that new development shall ensure the preservation of neighborhood environments; enhancement of the area's cultural, social, and aesthetic character with interfacing open spaces, reconciliation of disparate architectural elements with adjoining neighborhood communities: unification in patterns and standards of architectural development within the entire district. Alternative 2 would also be consistent with SMMC Sections 9.21.080 and 9.21.120 governing light and glare, and with SMMC Chapter 7.4 (Tree Code). Alternative 2 would also replace existing surface parking lots with new buildings, landscaping and open space that would be that would improve the visual quality of the community in accordance with LUCE city-wide design goals and policies (Chapter 2.1) and goals and policies pertaining to the Healthcare District (Chapter 2.6). As with the Project, Alternative 2 would be designed to be consistent with objectives of the HASP to support harmony of design within the PSJHC campus and between the medical campus and the surrounding community. Therefore, as with the Project, impacts with respect to consistency with applicable regulations that govern scenic quality would be less than significant. Because Alternative 2 would also comply with applicable regulations governing scenic quality such as the LUCE, impacts related to aesthetics would be similar to the Project.

Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Both the Project and Alternative 2 would create new sources of light and glare. However, while there are several light-sensitive uses in the immediate vicinity, the Project Site and surrounding area is already a lit urban environment. Furthermore, all proposed new exterior light sources would be shielded, and all proposed lighting and exterior building facades would be required to comply with SMMC requirements and undergo City design review by the ARB. Therefore, neither the Project or Alternative 2 would create new sources of substantial light or glare that could adversely affect day or nighttime views in the area. Impacts would be less under Alternative 2 owing to less development, and thus less lighting and a lower potential for glare generation under this alternative.

Would the project create shading effects that would interfere with the use of outdoor open space or solar accessibility?

As indicated in Section 4.1, the Project would not shade any existing shadow-sensitive uses in the vicinity (e.g., Berkley East Convalescent Hospital, small apartment buildings and single-family residences along Arizona Avenue and 21st Street, McKinley Elementary School, etc.) for more than 3 hours during the winter or for more than 4 hours during the remaining seasons. Thus, the Project would not create shading effects that could interfere with the use of outdoor open space or solar accessibility. As development under Alternative 2 would occur at the same locations (e.g., Development Sites) as under the Project, but would include less square footage, lower building heights, and omit some of the uses proposed under the Project (e.g., Education and Conference Center, visitor housing, Saint John's Café or Mullin Plaza Café), associated shading would similarly not interfere with the use of outdoor open space or solar accessibility. Shading impacts would be less under Alternative 2 due to less shading from the lower building heights.

Air Quality

Would the project conflict with or obstruct implementation of the applicable air quality plan?

Like the Project, construction and operation of Alternative 2 would generate emissions that would contribute to basin-wide air pollutant emissions, including construction NO_x and PM10 and operational NOx emissions that exceed SCAQMD thresholds before mitigation, and operational NO_x emissions that exceed SCAQMD thresholds after mitigation. Like the Project, Alternative 2 would: (1) comply with SCAQMD Rule 403 requirements during construction; (2) represent sustainable infill growth density in close proximity to mass transit consistent with SCAG RTP/SCS and SB 375 goals to reduce regional VMT; and (3) be consistent with LUCE and SCAG RTP/SCS growth projections. Impacts would be less under Alternative 2 than under the Project, owing to less development and vehicle trips, and lower associated construction and operational emissions.

Would the project 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?

Regional Construction Emissions

Under Alternative 2, construction activities at the Project Site would be reduced slightly from those that would occur under the Project owing to the reduced amount of new development. Because the Project's regional construction emissions would be less than the SCAQMD's significance thresholds for most criteria pollutants and ozone precursors, so too would regional construction emissions under Alternative 2. Still, like the Project, it is conservatively assumed that construction activities under Alternative 2 would exceed applicable SCAQMD regional maximum daily emissions thresholds for NOx, even with compliance with SCAQMD Rule 403 (Control of Fugitive Dust), given the substantial exceedance of the NOx threshold under the Project (167 lbs/day vs. the threshold of 100 lbs/day). However, impacts would be less than significant after mitigation (MM-AIR-1) under both the Project and Alternative 2, with impacts being less under Alternative 2.

Regional Operational Emissions

Operational emissions were assessed for area, energy, mobile, and stationary sources for the Project in Section 4.2, *Air Quality*, with emissions from mobile sources (vehicle trips) making up the largest component of the operational emissions. Under Alternative 2, the net increase in development at the Project Site would be 400,395 square feet versus 571,945 square feet under the Project (a reduction of approximately 30 percent). This would translate into a reduction in the number of weekday net vehicle trips generated from 9,826 to 8,187 trips, with an associated reduction in regional operational emissions. Because of the reduced floor area under Alternative 2, area, energy and stationary source emissions from building operations would also be less. Similar to the Project, Alternative 2 would be required to meet regulatory energy efficiency requirements and would reduce regional VMT per capita and associated mobile source emissions given its infill nature and proximity to mass transit facilities. Still, like the Project, it is conservatively assumed that regional operational emissions associated with Alternative 2 would exceed SCAQMD significance thresholds for NO_x given the substantial exceedance of the NOx threshold under the

Project (e.g., 96 lbs/day vs. the threshold of 55 lbs/day). Impacts would significant unavoidable under both the Project and Alternative 2, with impacts less under Alternative 2.

Would the project expose sensitive receptors to substantial pollutant concentrations?

Localized Emissions

Section 4.2, *Air Quality* addresses the Project's impacts from construction and operational air pollutant emissions on nearby sensitive receptors. It also evaluates health risks due to toxic air contaminants (TACs) such as diesel emissions (DPM) from haul and delivery trucks. The analysis concludes that the potential increase in NO_x, PM10 and TACs during construction of the Project would exceed applicable SCAQMD significance thresholds at the nearest sensitive receptor locations before mitigation, with these construction impacts less than significant after mitigation. As described previously, construction and operational vehicle trips and activities would be less under Alternative 2 than under the Project. However, on a peak daily basis, worse-case daily construction NO_x, PM10 and TAC levels at the nearest sensitive receptor locations would be significant before mitigation, like the Project. With mitigation (MM-AIR-1), impacts would be reduced to less than significant. While maximum daily construction impacts would be similar to the Project, construction impacts are considered less under this alternative due to the decrease in the overall construction duration.

Carbon Monoxide Hotspots

Like the Project, Alternative 2 would generate operational vehicle trips that would incrementally increase CO levels at intersections and roadways within one-quarter mile of sensitive receptors. However, as indicated in Section 4.2, *Air Quality*, the Project would not cause or contribute to an exceedance of the CAAQS one-hour or eight-hour CO standards of 20 or 9.0 parts per million, respectively. Because Alternative 2 would result in less operational vehicle trips than the Project as indicated above, Alternative 2 would similarly not exceed the CAAQS standards. Therefore, impacts would be less than significant under both the Project and Alternative 2, with impacts less under Alternative 2 due to the proportionate decrease in trips.

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

Like the Project, Alternative 2 would include hospital/healthcare-related, medical office, medical research, commercial, and residential land uses that would not be expected to introduce substantial sources of odors. All refuse and recycling bins would be covered in designated storage areas and properly maintained to prevent adverse odors, and proper housekeeping practices would be implemented to promote odor control. Therefore, like the Project, construction and operation of Alternative 2 would not create objectionable odors affecting a substantial number of people, and impacts would be less than significant. Given the similarities in land uses between the Project and Alternative 2, the impacts of Alternative 2 would be similar to the Project.

Construction Effects

Would construction of the project result in considerable construction-period impacts due to the scope, or location of construction activities?

Similar to the Project, Alternative 2 would include construction activities that would generate temporary aesthetics effects and air emissions, noise/vibration, and vehicle trips. Alternative 2 would include approximately 70 percent of the net new development as the Project, and thus would most likely generate approximately 30 percent less total construction activities and associated aesthetics effects, air emissions, noise/vibration, and vehicle trips than the Project. However, the maximum amount of construction-related air emissions, noise/vibration and vehicle trips on a peak construction day would be expected to be similar between the Project and Alternative 2. In any event, similar to the Project, the construction-related aesthetics, air quality, and traffic impacts of Alternative 2 would be less than significant with mitigation, while construction noise impacts to off-site sensitive medical uses would remain significant and unavoidable. Overall, the level of impacts would be less under this alternative owing to less total construction activities.

Historical Resources

Would the project cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5?

As analyzed in Section 4.4 *Cultural Resources – Historical Resources*, the John Wayne Cancer Institute and CFDC appear eligible for federal, state, and local listing, and as such meet the definition of historical resources as outlined in CEQA Guidelines Section 15064.5(a). Additionally, there are four off-site historical resources that have views of the Project Site (Santa Monica Doctors Office at 2125 Arizona Avenue, a corner commercial building at 2301 Santa Monica Boulevard, Kingsley Gates Mortuary at 1925 Arizona Avenue, and McKinley Grammar School at 2401 Santa Monica Boulevard). These four resources are eligible for local listing, and as such meet the definition of historical resources as outlined in CEQA Guidelines Section 15064.5(a).

Like the Project, Alternative 2 would (1) demolish the John Wayne Cancer Institute and CFDC buildings which would represent a significant unavoidable impact (2) result in less than significant vibration impacts to the New Medical Arts Annex (a potentially historic building) after mitigation. Because both the Project and Alternative 2 would implement the same recommended mitigation relating to the on-site historic resources to be demolished, (e.g., recordation of, and interpretative exhibits for, the John Wayne Cancer Institute and CFDC buildings), the level of impact would be similar between the Project and Alternative 2.

Archaeological Resources

Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Section 15064.5?

Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Under Alternative 2, the spatial extent and depth of excavations at the Project Site would be reduced from those under the Project owing to the reduced development and omission of the below-grade tunnels under this alternative. This would result in a slightly reduced potential to encounter any archaeological resources and/or human remains that may be present at the Project Site. Still, as with the Project, excavations under Alternative 2 could potentially encounter archaeological resources and/or human remains and cause an adverse change in the significance of these resources. This impact would be less than significant after mitigation under both the Project and Alternative 2. Because of the slightly reduced risk to encounter such resources under Alternative 2, impacts would be slightly less under this alternative.

Energy

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

Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Under Alternative 2, construction activities at the Project Site would be reduced from that of the Project owing to the approximately 30 percent less net new development under this alternative. Therefore, energy consumption for construction would be reduced. As with the Project, Alternative 2 would use energy efficient construction equipment as well as implement a construction waste management plan during construction. As such, energy impacts during construction would also be less than significant.

Due to the reduction in building sizes, Alternative 2 would require less energy use from operation of energy sources (i.e., appliances, lighting) and HVAC equipment than the Project, and would generate fewer daily vehicle trips during operation. As with the Project, Alternative 2use newer energy efficient appliances, lighting, and equipment and would comply with water conservation, energy conservation, and other sustainability requirements of the City's Green Building Code and SMMC. Both the Project would increase urban density in a transit-rich area thereby minimizing vehicle trips and reducing regional VMT. Lastly, neither the Project and Alternative 2 would conflict or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, as with the Project, impacts under Alternative 3 would be less than significant, with the level of impact slightly less under this alternative.

Therefore, as with the Project, impacts under Alternative 2 would be less than significant, with the level of impact less under this alternative.

Geology and Soils

Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death, involving: (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides?

The Project Site is not bisected by an active fault with the potential to cause fault rupture at the surface, and no designated Alquist-Priolo Special Study Fault Zone bisects the Project Site. Therefore, the Project Site is not subject to fault rupture and, the Project and Alternative 2 would not cause potential substantial adverse effects involving fault rupture, and no impact would occur under either the Project or Alternative 2. Impacts would be similar between the Project and Alternative 2.

With regard to strong seismic ground shaking, the Project Site is subject to strong seismic ground shaking which could result in damage to structures and hazards to people under both the Project and Alternative 2. However: (1) the potential level of ground acceleration is common in Southern California; and (2) the associated effects can be mitigated through compliance with the geotechnical engineering design and construction standards specified by the SMBC and the seismic design parameters for the Project specified in the Preliminary Geotechnical Report. Furthermore, both the Project and Alternative 2 would replace older buildings on the Project Site with modern buildings constructed to the latest building code and seismic safety standards, and both would be required to adhere to the site-specific recommendations of a Final Geotechnical Report. Therefore, the Project and Alternative 2 would not cause potential substantial adverse effects involving strong seismic ground shaking, and impacts would be less than significant, with the level of impact similar between the Project and Alternative 2.

With regard to seismic-related ground failure, including liquefaction, while the liquefaction potential at the Project Site is low, development at the Project Site under both the Project and Alternative 2 would be required to implement the recommendations of a site-specific liquefaction evaluation to be provided in a Final Geotechnical Report. Compliance with applicable recommendations of the Final Geotechnical Reports would ensure that new development would not cause potential substantial adverse effects involving liquefaction. Thus liquefaction impacts under both the Project and Alternative 2 would be less than significant, with the level of impact similar between the Project and Alternative 2.

With regard to landslides, the Project site is not located within a designated landslide area or subject to landslides, and while slope instability is possible during excavations, compliance with the recommendations of the Final Geotechnical Reports would ensure that new construction under both the Project and Alternative 2 would not cause potential substantial adverse effects involving landslides. Therefore, impacts under both the Project and Alternative 2 would be less than significant, with the level of impact similar between the Project and Alternative 2.

Would the project 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; caused in whole or in part by the project's exacerbation of the existing environmental conditions?

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

Both the Project and Alternative 2 could be subject to unstable soil conditions and expansive soils if appropriate design measures are not taken. However, both the Project and Alternative 2 would be required to meet State and City Building Code requirements and comply with the design recommendations of the Preliminary and Final Geotechnical Reports. Regulatory compliance would ensure that impacts related to unstable soil conditions and expansive soils would be less than significant and similar between the Project and Alternative 2.

Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

There are no unique geologic features at the Project Site. Alternative 2 would have reduced development and would not develop below-grade vehicular tunnels as compared to the Project. Under Alternative 2, the spatial extent and depth of excavations at the Project Site would be reduced from those under the Project. This would result in a slightly reduced potential to encounter any paleontological resources that may be present at the Project Site. Still, as with the Project, excavations under Alternative 2 could potentially encounter paleontological resources. This impact would be less than significant after mitigation under both the Project and Alternative 2, but because of the slightly reduced risk to encounter paleontological resources and human remains under Alternative 2, impacts would be slightly less under this alternative.

Greenhouse Gas Emissions

Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG?

Both the Project and Alternative 2 would generate GHG emissions during construction and operation. Under the Project, the net increase in annual GHG emissions during construction and operation would be 10,356 metric tons of CO2e per year, and impacts would be less than significant. Alternative 2 would include less construction and operational activity, vehicle trips, and energy use than the Project, owing to the reduced amount of development under this alternative. As such, GHG emissions under this alternative would be less.

As with the Project, Alternative 2 would implement similar sustainable features (PDFs-AQ-1 through PDF-AQ-4) to reduce GHG emissions and would be required to comply with water conservation, energy conservation, tree-planting, and other sustainability requirements consistent

with the City's Green Building Code and SMMC. Thus, similar to the Project, Alternative 2 would not conflict with applicable plans, polices or regulations adopted for the purpose of reducing the emissions of GHGs (e.g., the City's LUCE, Sustainable City Plan, Climate Action Plan, AB 32, SB 375, etc.). Impacts would be less than significant under both the Project and Alternative 2. Because Alternative 2 would generate fewer GHG emissions than the Project, owing to less development, impacts would be less under this alternative.

Hazards and Hazardous Materials

Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction and operational activities under both the Project and Alternative 2 would include the routine transport, use, storage and disposal of small quantities of hazardous materials. Both would also generate small quantities of medical waste during operation similar to the types of medical waste currently generated at the PSJHC campus. However, the transport, use, storage and disposal of hazardous materials during construction and operation for both the Project and Alternative 2 would occur in accordance with manufacturer instructions and applicable federal, state and local health and safety regulations (e.g., RCRA and HWCA "cradle to grave" requirements, OSHA workplace and work practices requirements, City HMRRP/HMMP requirements, SMMC requirements, Unified Permit requirements, HASP requirements, etc.). Such instructions and regulations have been formulated to avoid the exposure of persons and the environment to hazardous materials. Therefore, neither the Project or Alternative 2 would create a significant hazard to the public or the environment through the routine transport, use, storage and disposal of hazardous materials, and impacts would be less than significant. Because the use of hazardous materials would be expected to be less under Alternative 2, owing to less construction and operational activities, the impact would be less under this alternative.

Would the project 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?

Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant of Government Code Section 6592.5, and as a result, it would create a significant hazard to the public or the environment?

Construction and operational activities under both the Project and Alternative 2 would include the use of hazardous materials which could be accidentally released. Furthermore, the Project Site contains two listed hazardous materials sites (open LUST case and former on-site serve stations), and several of the existing on-site buildings contain ACM and LBP. Construction activities (e.g., excavation and demolition) under both the Project and Alternative 2 could potentially disturb and release into the environment hazardous materials associated with these sites/buildings. However, through compliance with applicable regulations and manufacturer instructions, and with implementation of the recommended mitigation measures, neither the Project or Alternative 2 would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Impacts would be less

than significant under both scenarios, with the impacts of Alternative 2 slightly less owing to less construction activities and development and thus less potential for the accidental release of hazardous materials during construction and operation.

Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction and operational activities under both the Project and Alternative 2 could emit hazardous emissions (e.g., diesel emissions) and handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of McKinley Elementary School. Furthermore, pre-existing hazardous materials conditions (e.g., ASTs, ACMs, LBPs, etc.) exist at the Project Site, and construction activities under both the Project and Alternative 2 could potentially disturb associated hazardous materials and release them into the environment. However, through compliance with applicable regulations and manufacturer instructions, and with implementation of the recommended mitigation measures, impacts would be less than significant under both development scenarios. Impacts of Alternative 2 would be slightly less owing to less construction activities and development and thus less potential for the emission of hazardous materials during construction and operation.

Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Santa Monica Boulevard, Olympic Boulevard, and the Santa Monica Freeway are City-designated disaster routes. Like the Project, Alternative 2 could include temporary lane closures and/or detours during construction, and would generate construction- and operations-related vehicle trips. However, no streets would be blocked or substantially altered under Alternative 2. Furthermore, similar to the Project, any temporary lane closures or detours during construction would be undertaken under a required Construction Management Plan and would be reviewed and approved by the City. Lastly, the Project Site and surrounding area are served by a fully developed grid street system that offers multiple routes to each destination.

As compared to the Project, Alternative 2 would not alter the existing street network (e.g., the northern portion of 21st Street would not be vacated and replaced with a new north-south street between Santa Monica Boulevard and Broadway as it would under the Project). Therefore, like the Project, Alternative 2 would not impair implementation or physically interfere with an adopted emergency response or evaluation plan, and the impact would be less than significant. Because Alternative 2 would generate less construction and operational vehicle trips than the Project and would not alter the existing street system, impacts would be less under this alternative.

Hydrology and Water Quality

Would the project:

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

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

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

(iii) Impede or redirect flood flows?

The Project and Alternative 2 would not substantially alter the existing drainage pattern of the site or area since site drainage under both the Project and Alternative 2 would continue to be conveyed to the municipal storm drains in the adjacent streets. Similarly, neither the Project or Alternative 2 would result in substantial erosion or siltation as both the Project and Alternative 2 would comply with applicable regulations (e.g., the City's Runoff Conservation and Sustainable Management Ordinance) which have been formulated to avoid substantial erosion and siltation during construction and operation, and because during operation, all of the Project Site's ground surface would be covered by either impervious surfaces or landscaping. Impacts would be similar between the Project and Alternative 2.

With regard to impacts on the capacity of existing or planned stormwater drainage infrastructure, peak stormwater runoff from the Project Site would be expected to be reduced slightly under both the Project and Alternative 2. This is because the amount of impervious surfaces would decrease slightly under both the Project and Alternative 2 owing to increased landscaping and open space, and because both would be subject to the City's requirements to retain stormwater from either the 0.75 inch per 24-hour storm or the 85th percent storm, whichever is greater. Therefore, neither the Project or Alternative 2 would exceed the capacity of the local stormwater drainage system, and impacts would be less than significant under both the Project and Alternative 2. The level of impact would be expected to be slightly greater under Alternative 2 owing to less open space (e.g., pervious surfaces) than under the Project, and thus slightly greater stormwater runoff.

Would the project:

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

- Substantially alter the existing drainage patterns of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would:

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

(ii) Create or contribute runoff water which would provide substantial additional sources of polluted runoff?

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

- Conflict with or obstruct implementation of a water quality control plan?

Like the Project, Alternative 2 could potentially contribute pollutants in stormwater runoff during construction and operation that could drain to impaired receiving waters (e.g., Santa Monica Bay). However, both would comply with applicable water quality regulatory requirements (e.g., City's Runoff Conservation and Sustainable Management Ordinance, City LID requirements, etc.) which

have been formulated to comply with the TMDLs and avoid both violation of waste discharge requirements and substantial degradation of the water quality of these receiving waters. Compliance with these requirements would ensure that water quality impacts would be less than significant under both the Project and Alternative 2. These requirements include, but are not limited to, retaining stormwater from either the 0.75 inch per 24-hour storm or the 85th percent storm and implementing structural and non-structural water quality BMPs. Although the amount of development and associated potential for the deposition of pollutants that could be carried away in stormwater runoff would be reduced, the Project would increase landscaping and remove more surface parking area and, as such, would have less impact than under Alternative 2.

The LARWQCB maintains the Water Quality Control Plan for the Los Angeles Region (Basin Plan) in accordance with federal and State Law. The Basin Plan establishes beneficial uses for surface and groundwater in the region, and sets forth the regulatory water quality standards to protect those designated beneficial uses. In cases where the Basin Plan does not contain a water quality objective for a particular pollutant, other criteria are used to establish a standard. Other criteria may be applied from SWRCB documents (e.g., the Inland Surface Waters Plan and the Pollutant Policy Document) or from water quality criteria developed under Section 304(a) of the CWA. Permits issued to control pollution (i.e. waste discharge requirements and NPDES permits) must implement Basin Plan requirements (i.e. water quality standards), taking into consideration beneficial uses to be protected.

Construction and operational activities under both Alternative 2 and the Project would comply with the City's Runoff Ordinance, including but not limited to: (1) NPDES MS4 Permit requirements, implementation of an NPDES Construction General Permit SWPPP and ECSP, and SCAQMD rules, all of which require the implementation of BMPs during construction to control sedimentation, erosion, and pollutant loading of stormwater runoff from construction sites; (2) LARWQCB Construction Dewatering General Permit (NPDES Permit No. CAG994004) requirements for any construction dewatering; and (3) NPDES MS4 Permit requirements, City urban runoff (including stormwater retention) and LID BMP requirements. These requirements have been formulated to comply with the TMDLs for Santa Monica Beach and Santa Monica Bay, and to avoid substantial erosion, sedimentation, and pollutant loading of stormwater runoff from development during construction and operation. Therefore, with compliance with these requirements, Alternative 2 and the Project would comply with the Basin Plan, the impact would be less than significant, and the level of the impact would be similar.

The Project Site is not located in a FEMA designated 100-year floodplain or an area susceptible to flooding by the failure of a levee or dam. Therefore, neither the Project or Alternative 2 would place housing or other structures within a 100-year floodplain, impede or redirect flood flows, and/or 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. Impacts would be less than significant under, and similar between, the Project and Alternative 2.

The Project Site is not subject to potential inundation by seiche, tsunami or mudflow. Therefore, the Project and Alternative 2 would not be subject to these potential hazards, and impacts would be less than significant and similar.

Would the project:

- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the Basin?

- Conflict with or obstruct implementation of a sustainable groundwater management plan?

Alternative 2, like the Project, would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that it would impede sustainable groundwater management. This is because both would not: (1) have a substantial effect on the ratio of pervious to impervious surfaces at the Project Site; (2) include groundwater withdrawals (other than, potentially, small amounts of groundwater associated with any required dewatering); (3) overlay a designated groundwater recharge area; or (4) result in a substantial net increase in demand for water. Therefore, impacts would be less than significant under both the Project and Alternative 2, with the level of impacts generally similar.

Land Use and Planning

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

LUCE

The Project Site is designated by the LUCE as Healthcare District. LUCE goals and policies for the Healthcare District call for preserving and enhancing existing neighborhoods; encouraging walking, bicycling, and public transit; integrating land use and transportation to reduce per capita vehicle trips and GHG emissions; providing affordable housing; increasing open space and enhancing the pedestrian access; supporting the responsible expansion of the PSJHC; and updating the HASP. Both the Project and Alternative 2 would be consistent with the Healthcare District land use designation and goals/policies of the LUCE. Impacts would be less than significant under both the Project and Alternative 2. However, Alternative 2 would not be as effective as the Project in achieving some of the LUCE goals and policies (for example, integrating land use and transportation to reduce per capita VMT and GHG emissions, supporting the responsible expansion of the PSJHC, supporting the continued vitality of the City's hospitals, working with the hospitals to create a TDM district, providing an improved circulation network with pedestrian paths, open space and plazas, etc. Neither the Project nor Alternative 2 would result in adverse significant environmental impacts as a result of a conflict with a land use plan, policy or regulation. Impacts would be similar to the Project under Alternative 2.

HASP

The HASP establishes two overlays, SJ-N and SJ-S to govern the development of the PSJHC. The HASP defers to the PSJHC 1998 DA and Master Plan with respect to development standards and use regulations for the PSJHC Campus. The Project would require proposed amendments to the HASP, which include amendments to related maps, background information, development standards, objectives, and implementation program. Neither the Project or Alternative 2 would

result in significant impacts resulting from inconsistencies with HASP's objectives. Impacts with respect to the HASP with the proposed amendments would be similar under the Project and Alternative 2.

PSJHC Development Agreement

Neither the Project nor Alternative 2 would exceed the development rights vested to PSJHC by the City in the 1998 DA of 799,000 total for Phase II development (with a max. of 744,000 square feet above-grade), except that the Project would require an amendment to the DA to increase the vested floor area for Hospital/Health Care use from 354,000 square feet to 404,000 square feet. Both the Project and Alternative 2 would also be consistent with the height and setback requirements of the DA, but would require amendments to the DA to extend the Phase II vested rights. The Project would also require amendments of the DA for the proposed pedestrian bridge over Santa Monica Boulevard and expansion of the Mullin Entry Plaza including the addition of the Mullen Plaza Café, neither of which would be required for Alternative 2. With the proposed amendments to the DA, both would be consistent with the DA and would not result in significant environmental impacts. As such, impacts related to land use and planning would be similar to the Project.

Zoning

All of the Phase II Development Sites are zoned Healthcare Mixed-Use (HMU), except that a small portion of Site S5 is zoned Mixed-Use Boulevard Low (MUBL). Both the Project and Alternative 2 would include land uses that are consistent with the zoning of the Project Site such that the impact would be less than significant under both the Project and Alternative 2. This is because: (1) both would include the use types permitted in these zones and generally the setbacks required; and (2) the PSJHC DA overrides the zoning during the term of the DA (e.g., until 2053). The only substantive difference would be that the Project would be developed to the Tier 2 densities and heights permitted by the Zoning Code with the provision of public benefits, while Alternative 2 would not be developed to these densities/heights and would not provide the qualifying public benefits. Neither the Project nor Alternative 2 would result in significant impacts as a result of inconsistencies with zoning. However, because the Project would provide more public benefit through greater open space than under Alternative 2, it would more closely meet the community benefit objectives of the HMU zone. Land use and planning impacts related to zoning would be similar between the Project and Alternative 2.

SCAG RTP/SCS

As indicated in Section 4.11, *Land Use and Planning*, the Project would be consistent with RTP/SCS goals (see Table 4.11-5), with key points supporting this conclusion as:

- The Project would provide for the expansion of its health care and related facilities within the Healthcare District, near two Expo Light Rail stations, near bus lines along Santa Monica Boulevard and 20th Street, and would implement a TDM program to reduce single-occupancy vehicle trips.
- The Project would provide new bicycle connections to the dedicated bicycle lane on Broadway, bicycle parking, pedestrian pathways, and widened sidewalks on Santa Monica Boulevard and Broadway to encourage active transportation.

- The Project would incorporate sustainability features to improve air quality, such as optimizing passive strategies to reduce energy use (e.g., building orientation, operable windows, and shading); solar photovoltaic panels; solar water heating; green roofs; low-flow fixtures; energy efficient heating, ventilation, HVAC and lighting; electrical vehicle charging stations; and a TDM program to reduce single-occupancy vehicle trips.

Because the above key points would also apply to Alternative 2, Alternative 2 would also be consistent with the RTP/SCS. Because both would encourage pedestrian activity and locate higher urban density in proximity to transit, neither the Project nor Alternative 2 would result in significant impacts as a result of inconsistencies with the RTP/SCS. Land use and planning impacts related to plan consistency would be less than significant and similar under both the Project and Alternative 2.

Neighborhood Effects

Would the project have considerable effects on the neighborhoods in which they are located?

Both Alternative 2 and the Project would result in a net increase in development at the Project Site, and associated construction and operational activities, that would generate neighborhood effects within the Mid-City neighborhood. The Project would result in less than significant neighborhood effects in terms of aesthetics, land use, noise, and air quality, and with significant unavoidable neighborhood effects in terms of traffic impacts on operational intersection and street segment LOS. Alternative 2 would result in similar impacts, owing to the 400,395 square feet of net new development under this alternative, although the level of these impacts would be less than under the Project owing to approximately 30 percent less development under this alternative. Although traffic impacts at one intersection would be significant and unavoidable under both the Project and Alternative 2, neighborhood effects would be incrementally less under Alternative 2 than under the Project.

Noise and Vibration

Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction

Both the Project and Alternative 2 would require the use of heavy motorized construction equipment (graders, excavators, etc.) and stationary construction equipment (generators, electric hand tools, etc.) for on-site construction activities (e.g., demolition, grading, excavation, foundation/concrete pouring, building construction, etc.). This, along with construction vehicle trips (haul trucks, construction worker vehicle trips, etc.) on area streets, would generate varying levels of temporary noise during the approximately 22-year construction period.

As evaluated in Section 4.13, *Noise and Vibration*, of this EIR, Project construction activities would not exceed SMMC noise standards at existing adjacent noise-sensitive receptors before 10 a.m. or after 3 p.m. While Project construction activities would temporarily or periodically increase ambient noise levels at some of the surrounding sensitive receptors during daytime hours, impacts

would be less than significant due in part to noise attention between the noise source and receptors, City limits on the times of day when construction activities can occur; and PDF NOISE-1 requiring properly operating mufflers on construction equipment, locating construction staging areas as fall as possible from noise-sensitive uses, and installing temporary noise barriers.

Because Alternative 2 would include less net new development than the Project, it is anticipated that it would result in less construction activity and thus less total construction noise than the Project (although maximum day construction activities and associated noise during these maximum construction days would be similar). Hence, impacts would be less than significant under Alternative 2 as well, with the level of impact less under this alternative.

With regards to construction vehicular noise, as indicated in Section 4.13, Project construction vehicular noise would not increase existing roadway noise levels by 5 dBA CNEL or greater, and the impact would be less than significant. Because Alternative 2 would include less net new development than the Project, and generate less construction vehicle trips (although it would be expected to generate the same amount of construction vehicle trips during maximum day construction activities), impacts would be less than significant under Alternative 2 as well. The level of impact would be less under Alternative 2 owing to less construction vehicle trips during non-maximum construction days.

Operation

Both the Project and Alternative 2 would include on-site mechanical equipment (e.g., HVAC systems, emergency generators, etc.), parking structure and loading dock use, outdoor open space activity, and operational vehicle trips that could contribute to increased noise levels. As indicated in Section 4.13 of this EIR for the Project, all mechanical equipment would be designed with noise control devices or enclosures that limit exterior noise levels to 60 dBA during the day and 50 dBA at night[2], parking structure and loading dock use would not increase ambient noise levels by more than 5 dBA, outdoor open space activity would not increase noise levels at 50 ft by more than 5 dBA Leq, and operational vehicle trips would not increase noise by more than 5 dBA CNEL, such that operational noise impacts would be less than significant.

Alternative 2 would include approximately 30 percent less development than the Project and thus would include less mechanical equipment, parking structure use, outdoor open space activity, and operational vehicle trips. Furthermore, it would be required to comply with the same City noise regulations as the Project, and as such, Alternative 2 would also result in less than significant operational noise impacts. The level of these impacts would be slightly less under Alternative 2 owing to less operational noise under this alternative.

Additionally, as analyzed in Section 4.13 the Project's composite noise generated by all these noise sources together would be less than significant. Because vehicular noise levels would be the dominant noise source from Project operations, and because Project operational vehicular noise impacts would be less than significant, so too would the Projects composite noise. For these same reasons, the composite operational noise impacts of Alternative 2 would also be less than

[2] PDF-NOISE-7 requires an acoustical analysis of the proposed mechanical plans to ensure that all mechanical equipment is designed to meet City noise limits.

significant, with the level of impact less owing to less operational vehicular noise under this alternative.

Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Construction

As indicated in Section 4.13, Project construction would include the use of heavy construction equipment at the Project Site that could generate groundborne vibration levels that exceed both the FTA structural damage threshold of 0.3 in/sec PPV at the nearest existing buildings and the FTA sensitive use threshold for surgical uses of 0.008 in/sec PVV.[3] Mitigation Measure NOISE-2 would prevent vibration impacts to vibration sensitive medical equipment at medical office buildings not owned/controlled by Saint John's that participate in Mitigation Measure NOISE-2 through location inventory, simulation testing, equipment relocation, equipment isolation, not conducting construction during active use of equipment, or alternative construction methods. Thus, potentially significant construction vibration impacts at participating medical office buildings not owned/controlled by Saint John's would be reduced to a less than significant level. However, for any medical office buildings not owned/controlled by Saint John's that do not participate in Mitigation Measure NOISE-2, Project construction vibration could result in significant impacts to vibration sensitive medical equipment.

Because the use of heavy construction equipment would also occur during construction of Alternative 2, groundborne vibration levels under Alternative 2 could also potentially exceed the above thresholds. For any medical office buildings not owned/controlled by Saint John's that do not participate in Mitigation Measure NOISE-2, construction vibration under Alternative 2 could also result in significant impacts to vibration sensitive medical equipment. The level of the impacts would be less under Alternative 2 than under the Project owing to less development and thus less construction activities and associated groundborne vibration under this alternative.

Operation

Operation of both the Project and Alternative 2 would include the use of mechanical equipment and would generate vehicle trips, both of which would generate small amounts of groundborne vibration. However, as indicated in Section 4.13 of this EIR, Project operation would not cause groundborne vibration that exceeds applicable thresholds (e.g., the FTA's structural damage and surgical use thresholds discussed previously, as well as the human annoyance threshold of 72 VdB). Because Alternative 2 would include similar uses but less development than the Project, it too would generate less than significant operations-related ground-borne vibration, with the level of impact less under this alternative.

[3] Per the SMMC, construction activities are exempt from human annoyance thresholds for groundborne vibration.

Population and Housing

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

Like the Project, Alternative 2 would represent infill development within an area already fully served by roads and other infrastructure, and thus would not extend roads or infrastructure or indirectly induce substantial unplanned population growth.

Both the Project and Alternative 2 would maintain the existing number of multi-family residential units at the Project Site (Alternative 2 by retaining the 10 existing housing units, and the Project by replacing these units with 10 new multi-family housing units). Therefore, neither the Project or Alternative 2 would directly induce substantial unplanned population growth by proposing new housing. Also like the Project, Alternative 2 would also result in a net increase in medical and associated uses at the Project Site that would create new jobs, with this increase less under this alternative owing to less net new development. Still the increases in employment under both would be consistent with the employment growth projected in the City's LUCE and SCAG's 2016-2040 RCP/SCS because: (1) the number of new employees under both would represent small proportions of the total employment growth projected; (2) this increase in employment is already included in the growth projections; and (3) both would develop less uses, and thus generate less employees, than has been vested at the Project Site by the 1998 PSJHC DA[4]. Therefore, Alternative 2, like the Project, would not directly induce substantial population growth. Impacts would be less than significant under both, with the level of impacts similar.

Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Alternative 2 would retain the 10 existing vacant multi-family residential units on the Project Site. Therefore, Alternative 2 would not displace substantial number of existing housing or people, and like the Project, would result in less than significant impacts, with the level of impacts similar.

Police Protection

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

Similar to the Project, construction and operational activities under Alternative 2 would create a demand for police protection services and could potentially slow emergency response times and interfere with emergency access. However, as with the Project: (1) the increase in demand would be small, and would be off-set through site security features (construction fencing, controlled

[4] The PSJHC 1998 DA (Section 3.7.3(a)-(b)) established vested rights for up to 799,000 square feet of floor area, 10 replacement apartments, and up to 100 visitor housing units at the Phase II Development Sites.

access, 24-hour security guards/patrols, etc.) and compliance with City security and lighting requirements; and (2) adequate emergency access would be maintained through implementation of the required Construction Management Plan and City (including SMPD) review/approval of the proposed site plan. Furthermore, consistent with the *City of Hayward v. Trustees of California State University* (Court of Appeal of the State of California, 2015), significant impacts under CEQA consist of adverse changes in any of the physical conditions caused by a project, and potential impacts on emergency response times are not an environmental impact that CEQA requires a project to mitigate. Therefore, Alternative 2, like the Project, would not require new or expanded police protection facilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant. Because Alternative 2 would include less development and thus generate less demand for police protection services than the Project, impacts would be less under this alternative.

Fire Protection

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

Similar to the Project, construction and operational activities under Alternative 2 would create a demand for fire protection services and fire flow, and could potentially slow emergency response times and interfere with emergency access. However, as with the Project: (1) the increase in demand for service would be off-set through fire prevention features (including automatic sprinkler systems in all buildings) and regulatory compliance; (2) adequate emergency access would be maintained through implementation of the required Construction Management Plan and City (including SMFD) review/approval of the proposed site plan; and (3) adequate fire flow would be assured through the provision of required fire hydrants, payment of the City's Water Capital Facility Fee, and provision of improvements to off-site water lines if required. Furthermore, consistent with the *City of Hayward v. Trustees of California State University* (Court of Appeal of the State of California, 2015), significant impacts under CEQA consist of adverse changes in any of the physical conditions caused by a project, and potential impacts on emergency response times are not an environmental impact that CEQA requires a project to mitigate. Therefore, Alternative 2, like the Project, would not require new or expanded fire protection facilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant. Because Alternative 2 would include less development and thus generate less demand for fire protection services than the Project, impacts would be less under this alternative.

Transportation

Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?

Both Alternative 2 and the Project would include mixed-use medical and residential development on the PSJHC Campus, although Alternative 2 would include slightly less medical development

than the Phase II development planned for under the 1998 PSJHC DA and subsequent amendments. The primary goals of the LUCE and SCAG's 2016 RTP/SCS with regard to alternative transportation in Santa Monica are focused on shifting trips away from single-occupancy vehicles to more sustainable modes of travel such as transit, bicycling, and walking. To achieve this goal, the LUCE encourages the development of mixed-use communities with attractive and safe bicycle and pedestrian facilities that are also well connected to high-capacity and frequent transit service. Both Alternative 2 and the Project would support the LUCE policies that encourage alternative transportation in that each would: (1) represent a mixed-use development and the intensification of urban density on an infill site in proximity to transit (including two Metro rail stations and multiple bus lines); (2) include pedestrian improvements along Santa Monica Boulevard and Broadway (such as widened sidewalks), improvements to the on-site pedestrian network, and new bicycle parking and connections to the dedicated bike lanes Broadway; and (3) implement a TDM program (PDF-TRAF-2) to encourage the use of alternative transportation and reduce single occupancy vehicle trips and VMT as much as possible. Hence, both the Project and Alternative 2 would result in less than significant impacts in terms of consistency with circulation plans/programs/policies. The level of the impacts would be slightly greater under Alternative 2 owing to slightly less intensification of density in proximity to transit and thus slightly less expected alternative transportation use under this alternative (although both would reduce VMT as discussed further below).

Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) ?

Vehicle Miles Travelled

CEQA Guidelines Section 15064.3(b) applies to an alternative approach to the evaluation of transportation impacts, such as the evaluation of per capita vehicles miles traveled (VMT) in lieu of the evaluation of peak hour vehicle trips. The City has not yet adopted a VMT methodology to address this updated CEQA Guidelines Appendix G Checklist Question. As such, the following VMT analysis is provided for informational purposes (no significance determination provided) only. The VMT under the Project would be an estimated 12.8 miles daily for employees and 8.3 daily for non-workers (e.g., patients and visitors), versus the City average of 19.3 miles. Like the Project, it is anticipated that VMT under Alternative 2 would be less than the City average owing to the intensification of density in proximity to transit and implementation of the proposed TDM Program (PDF-TRAF-2). Therefore, both the Project and Alternative 2 would reduce local and regional VMT per capita, air emissions, GHG emissions, and gasoline demand. The level of impact would be slightly greater under Alternative 2 because this alternative would result in less intensification of density in proximity to transit, and thus likely slightly greater VMT, than the Project.

Intersection Operations

As indicated in Table 5-2, Alternative 2 operation would generate an estimated net increase of 543 AM peak hour trips, 631 PM peak hour trips, and 8,187 daily weekday trips at buildout (2042). This is compared to the Project that would generate an estimated net increase of 641 AM peak hour trips, 754 PM peak hour trips, and 9,826 daily trips at buildout. Hence, Alternative 2 would generate

approximately 16 percent less operational vehicle trips than the Project. This net increase in operational vehicle trips would result in exceedance of applicable level of service standards at some of the 83 study intersections under both the Project and Alternative 2.

Table 5-5, *Summary of Project and Alternative Intersection Impacts Before Mitigation– City of Santa Monica Analysis Methodology (HCM)*, and **Table 5-6**, *Summary of Project and Alternative Intersection Impacts Before Mitigation – City of Los Angeles Analysis Methodology (CMA)*, identify the intersections significantly impacted under the alternatives and the Project before mitigation. As indicated therein, under the HCM methodology the Project's Approval Year[5] (2019) impact at 23rd Street & Arizona Avenue (Study Intersection 42), and the Project's Future Year (2042) impact at Bundy Drive & Ocean Park Boulevard (Study Intersection 80), would not occur under Alternative 2. Intersection impacts under the CMA methodology would be similar to those of the Project. In all, 13 intersections would be significantly impacted under Alternative 2 before mitigation versus 14 under the Project. With implementation of the mitigation measures identified in Section 4.17, 10 intersections (e.g., Intersections 26, 33, 42, 44, 50, 53, 74, 79, 82 and 83) would be significantly and unavoidably impacted under Alternative 2 versus 11 under the Project (both assuming approval of the mitigation measures by the applicable regulatory agencies). Therefore, similar to the Project, Alternative 3 would result in a significant unavoidable impact to intersection operations. The level of impact would be less under Alternative 2 owing to one less intersection significantly unavoidably affected, and less vehicle trips under this alternative.

Street Segment Operations

Both the Project and Alternative 2 would generate an increase in operational vehicle trips that would exceed applicable base ADT standards along some of the 17 study street segments in the Project Site vicinity. Alternative 2 would result in significant operational base ADT impacts along two street segments, Arizona Avenue and 23rd Street (versus six under the Project). As with the Project, no feasible mitigation is available to mitigate these impacts. Therefore, both the Project and Alternative 2 would result in significant unavoidable street segment operations impacts. The level of impact would be less under Alternative 2 owing to fewer street segments significantly impacted under this alternative.

[5] The Approval Year (2019) condition (e.g., existing + Project condition) is evaluated for information purposes only as required by CEQA.

TABLE 5-5
SUMMARY OF PROJECT AND ALTERNATIVES INTERSECTION IMPACTS BEFORE MITIGATION-
CITY OF SANTA MONICA ANALYSIS METHODOLOGY (HCM)

		Approval Year (2019)						Future Year (2042)					
No.	**Intersection**	**Proposed Project**	**Alt. 1**	**Alt. 2**	**Alt. 3**	**Alt. 4**	**Alt. 5**	**Proposed Project**	**Alt. 1**	**Alt. 2**	**Alt. 3**	**Alt. 4**	**Alt. 5**
26	20th Street & Arizona Avenue	X		X	X	X	X						
33	20th Street & Pico Boulevard							X		X	X	X	X
42	23rd Street & Arizona Avenue	X			X			X		X	X	X	X
44	23rd Street & Broadway							X		X	X	X	X
50	Cloverfield Boulevard & Olympic Boulevard	X		X	X	X	X	X		X	X	X	
53	Cloverfield Boulevard & I-10 EB On-Ramp							X		X	X	X	X
70	Centinela Avenue & Santa Monica Boulevard												
74	Centinela Avenue & I-10 WB On-Off Ramps	X		X	X	X	X	X		X	X	X	X
77	Bundy Drive & Santa Monica Boulevard												
79	Bundy Drive & Olympic Boulevard							X		X	X	X	X
80	Bundy Drive & Ocean Park Boulevard	X		X	X	X		X			X		
81	Bundy Drive & I-10 EB On-Ramp							X		X	X	X	X
82	Barrington Avenue & Wilshire Boulevard							X		X	X	X	X
83	Barrington Avenue & Santa Monica Boulevard												
Total Impacted Intersections:		**5**	**0**	**4**	**5**	**4**	**3**	**10**	**0**	**9**	**10**	**9**	**8**

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, April 2019.

TABLE 5-6
SUMMARY OF PROJECT AND ALTERNATIVES INTERSECTION IMPACTS BEFORE MITIGATION - CITY OF LOS ANGELES ANALYSIS METHODOLOGY (CMA)

		Approval Year (2019)						Future Year (2042)					
No.	**Intersection**	**Proposed Project**	**Alt. 1**	**Alt. 2**	**Alt. 3**	**Alt. 4**	**Alt. 5**	**Proposed Project**	**Alt. 1**	**Alt. 2**	**Alt. 3**	**Alt. 4**	**Alt. 5**
26	20th Street & Arizona Avenue												
33	20th Street & Pico Boulevard												
42	23rd Street & Arizona Avenue												
44	23rd Street & Broadway												
50	Cloverfield Boulevard & Olympic Boulevard												
53	Cloverfield Boulevard & I-10 EB On-Ramp												
70	Centinela Avenue & Santa Monica Boulevard	X		X	X	X		X		X	X	X	
74	Centinela Avenue & I-10 WB On-Off Ramps												
77	Bundy Drive & Santa Monica Boulevard							X		X	X	X	X
79	Bundy Drive & Olympic Boulevard							X		X	X	X	X
80	Bundy Drive & Ocean Park Boulevard												
81	Bundy Drive & I-10 EB On-Ramp							X		X	X	X	X
82	Barrington Avenue & Wilshire Boulevard	X		X	X	X		X		X	X	X	
83	Barrington Avenue & Santa Monica Boulevard							X		X	X	X	
Total Impacted Intersections:		**2**	**0**	**2**	**2**	**2**	**0**	**6**	**0**	**6**	**6**	**6**	**3**

SOURCE: Fehr & Peers, Traffic Impact Analysis for Providence St. John's Health Center Phase II Project, April 2019.

Vehicle trips generated by the Project would not result in exceedance of Metro's CMP screening threshold (e.g., 150 trips during the AM or PM peak hour) at the mainline freeway monitoring locations analyzed. Because Alternative 2 would result in less trip generation than the Project but would share similar trip characteristics, it too would not result in exceedance of Metro's CMP screening thresholds at the mainline freeway monitoring locations analyzed. However, the Project would exceed Metro's screening threshold (e.g., 50 trips during the AM or PM peak hour) at three arterial intersections including Intersections 47 (Cloverfield Blvd/Santa Monica Blvd.), 60 (2th St./Wilshire Blvd.), and 77 (Bundy Dr./Santa Monica Blvd.), and Alternative 2 could potentially do the same. Still, neither would result in exceedance of the CMP guideline's significance thresholds at these intersections (e.g., an increase in vehicle trips of 2% of capacity, causing LOS F, or, if the facility is already at LOS F, an increase in vehicle trips of 2% of capacity). Therefore, impacts would be less than significant under both the Project and Alternative 2, with the level of impacts less under Alternative 2 owing to less trip generation under this alternative.

CMP Traffic Analysis

Vehicle trips generated by the Project would not result in exceedance of Metro's CMP screening threshold (e.g., 150 trips during the AM or PM peak hour) at the mainline freeway monitoring locations analyzed. Because Alternative 2 would result in less trip generation than the Project but would share similar trip characteristics, it too would not result in exceedance of Metro's CMP screening thresholds at the mainline freeway monitoring locations analyzed. However, the Project would exceed Metro's screening threshold (e.g., 50 trips during the AM or PM peak hour) at three arterial intersections including Intersections 47 (Cloverfield Blvd/Santa Monica Blvd.), 60 (2th St./Wilshire Blvd.), and 77 (Bundy Dr./Santa Monica Blvd.), and Alternative 2 could potentially do the same. Still, neither the Project or Alternative 2 would result in exceedance of the CMP guideline's significance thresholds at these intersections (e.g., an increase in vehicle trips of 2% of capacity, causing LOS F, or, if the facility is already at LOS F, an increase in vehicle trips of 2% of capacity). Therefore, impacts would be less than significant under both the Project and Alternative 2, with the level of impacts less under Alternative 2 owing to less trip generation under this alternative.

CMP Transit Analysis

The transit person trips expected to be generated by the Project would represent less than 1 percent of the capacity of the bus lines and Metro rail lines serving the study area and the Project Site. Because Alternative 2 would result in less demand for transit than the Project, owing to less development and therefore less employees and patients, it too would result in less than 1 percent of the capacity of the bus and rail lines serving the study area of the Project Site. This level of ridership increase would represent a less than significant impact on the regional transit system under both the Project and Alternative 2, with the level of impact less under Alternative 2 owing to less transit demand under this alternative.

Similar to the Project, Alternative 2 would represent a mixed-use development and the intensification of urban density on an infill site in proximity to transit, would include pedestrian and bicycle improvements, and would implement a TDM program to encourage the use of alternative transportation and reduce single occupancy vehicle trips as much as possible. As indicated previously, the Project would also reduce VMT. Therefore, similar to the Project,

Alternative 2 would be consistent with adopted City plans, policies, and programs supporting alternative transportation (e.g., LUCE, SMMC, Santa Monica Bike Action Plan, SB 743, SCAG's 2016 RTP/SCS, etc.), and the impact would be less than significant. The level of impacts would be greater under Alternative 2 owing to less development and less intensification of VMT-reducing density in proximity to transit, as well as less pedestrian facilities, than under the Project.

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

As indicated in Section 4.17, *Transportation*, the Project would not include any hazardous design feature such as sharp curves or dangerous intersections either on- or off-site (e.g., all proposed intersections would be at right-angles and signal or stop controlled, and the City would review all proposed street improvements for safety and compliance with City Code requirements). Furthermore, the Project would include the development of hospital/healthcare-related, medical office, medical research, commercial, and residential uses rather than the types of uses (e.g., industrial, landfill, agriculture, etc.) that could be hazardous or incompatible. Therefore, the Project would result in less than significant impacts with regard to hazards due to design features. For these same reasons and the fact that Alternative 2 would maintain the existing street network, Alternative 2 would result in less than significant impacts, with the level of impacts similar to the Project.

Would the Project result in inadequate emergency access?

As discussed in Sections 4.9, *Hazards and Hazardous Materials*, 4.15, *Police Protection*, and 4.16, *Fire Protection*, emergency access to the Project Site is currently available directly from several large arterials, including Arizona Avenue, Santa Monica Boulevard, Broadway, and 20th Street. Also: (1) the Project does not propose the closure or the major modification of these streets; and (2) the proposed site plan and associated street improvements would be reviewed and approved by multiple City Departments to ensure compliance with City code requirements and the provision of adequate emergency access. Furthermore, the Project proposes medical uses and would be located immediately adjacent to Saint John's Hospital such that immediate emergency medical service would always be available. Lastly, a Construction Management Plan (PDF-TRAF-1) would be implemented to, in part, ensure the continued provision of emergency access during the construction period. Therefore, the Project would not result in inadequate emergency access, and the impact would be less than significant. For these same reasons, Alternative 2 would result in less than significant impacts, with the level of impacts less under Alternative 2 because of less development and less development, and because the existing street network would remain as is under this alternative (no vacation of a portion of 21st St., etc.).

Tribal Cultural Resources

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

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k); or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

No tribal cultural resources, as defined in PRC Section 21074, were identified as located on the Project Site during the tribal consultations required by AB 32. Therefore, the Project and Alternative 2 would not cause a substantial adverse change in the significance of tribal cultural resources, and no impact would occur under either.

Water Supply

Would the project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects?

As indicated in Section 4.18, Water Supply, the domestic water and fire flow water required for the Project would be sourced from the same public water mains, with: (1) the northern portion of the existing water line in 21st Street relocated west to 20th Place and then connecting back to the existing water line in 21st Street, or alternatively protected in place; (2) new water laterals installed connecting the proposed buildings to the existing 8-inch water lines in 20th Street and the existing 12-inch water line in 21st Street, Santa Monica Boulevard, and Broadway; and (3) all buildings would be developed with fire suppression sprinklers which, per the SMMC, would require fire flow requirements.

As indicated in Section 4.18, *Water Supply*, flow test results conducted for the Project indicate that: (1) adequate capacity exists in the existing water lines to provide the required domestic water needs of the Project; and (2) while four additional fire hydrants would be required, implementation of Mitigation Measure MM-WS-1 requiring provision of the hydrants would provide the required fire flow. Because Alternative 2 would include less development than the Project, and thus less of a demand for domestic water and fire flow, these same conclusions apply to Alternative 4 as well.

The environmental effects of construction of the on-site water infrastructure for both the Project and Alternative 2 is subsumed in the impact analyses for the other environmental topics evaluated in this EIR (e.g., air quality, noise, etc.). Also, the environmental effects of the construction of the required off-site water infrastructure improvements (e.g., fire hydrants) would be minimal owing to their limited area of disturbance, their location within the existing street rights-of-way, and compliance with the proposed Construction Traffic Management Program. Therefore, neither the Project or Alternative 2 would require or result in the construction of new water facilities or the expansion of existing facilities, the construction of which would cause significant environmental effects. The impacts of both the Project and Alternative 2 would be less than significant, with the level of impacts similar.

Would the project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Alternative 2 would result in a net increase in development at the Project Site of 400,395 square feet of floor area (exclusive of structured parking), as compared to 571,945 square feet under the Project. This net increase in development would generate an increase in water demand from the City under both projects. **Table 5-7**, *Alternative 2 – Estimated Water Demand*, provides an estimate of the increase in water demand under Alternative 2. As indicated, Alternative 2 would generate an average increase in water demand of an estimated 196,912 GPD or 220.49 AFY (compared to 195,293 GPD or 215 AFY under the Project).

The City's 2015 UWMP analyzes the reliability of the City's water resources to meet water demand for normal, single-dry and multiple-dry year scenarios though 2040. The City's 2040 water supply during these scenarios is projected to be 155 percent, 142 percent, and 150 percent of demand, respectively (7,223 AF, 6,031 AF, and 6,659 AF, respectively). Therefore, the UWMP projects that the City would have adequate water supply to meet its demand, and in fact would have substantially more supply than demand, through at least the 2040 planning horizon of the UWMP. Because the estimated increase in water demand under the Project and Alternative 2 would each represent very small proportions of these surpluses, the City's water supplies would be adequate to meet water demand during normal, dry and multiple dry years under both the Project and Alternative 2. No new or expanded water entitlements would be required, and impacts would be less than significant under both the Project and Alternative 2. As water demand would be less under Alternative 2, the level of impacts under this alternative would be less than under the Project.

The above analysis is conservative because: (1) it assumes that Project water demand is not accounted for in the UWMP's water demand projections, when in fact this demand is most likely included as the projections are based on zoning and both the Project and Alternative 2 would be consistent with zoning; (2) it does not account for reductions in Project water demand associated with the implementation of required water conservation features; and (3) the 2015 UWMP was completed prior to the adoption of the City's Water Neutrality Ordinance such that the City's future water demand would likely be less than that projected in the 2015 UWMP.

TABLE 5-7
ALTERNATIVE 2 – ESTIMATED WATER DEMAND

Development Site	Uses	Floor Area/ Units per Use	Wastewater Generation Factor[a]	Water-Wastewater Ratio[a]	Average Water Demand	
					GPD	AFY
2I	Medical Office	63,000 sf	250 gal/ksf	1.5	23,625	26.5
	General Retail Sales, Small-Scale	4,500 sf	50 gal/ksf	1.5	338	0.4
	Up to four levels of subterranean parking	171,984	20 gal/ksf	1.5	5,160	5.78
2C	Hospital and Clinic Research and Development	62,300 sf	250 gal/ksf	1.5	23,363	26.2
	General Retail Sales, Small-Scale	5,500 sf	50 gal/ksf	1.5	413	0.5
	Up to four levels of subterranean parking	118,265 sf	20 gal/ksf	1.5	3,548	3.97
2D/E	Hospital and Clinic, Research and Development	55,500 sf	250 gal/ksf	1.5	20,813	23.3
	General Retail Sales, Small-Scale	3,000 sf	50 gal/ksf	1.5	225	0.3
	Up to four levels of subterranean parking	115,729 sf	20 gal/ksf	1.5	3,472	3.89
South Campus West of 21st Street South S1	Hospital and Clinic (Child & Family Development Center)	42,900 sf	250 gal/ksf	1.5	16,086	18.0
	Child Care and Early Education Facilities	9,000 – 15,000 sf	120 gal/ksf	1.5	2,700	3.0
	Up to five levels of subterranean parking	303,973 sf (includes S3)	20 gal/ksf	1.5	9,119	10.21
South Campus West of 21st Street North S3	Hospital and Clinic or Research and Development	73,750 sf	250 gal/ksf	1.5	27,657	31.0
	Restaurant	5,000 sf	50 gal/ksf	1.5	375	0.4
	Up to five levels of subterranean parking	(Included with S1, above)	50 gal/ksf	1.5	-	-
South Campus East of 21st Street S2, S4, S5 excluding MUBL Site and existing Multi-Family Housing	General Retail Sales, Small-Scale Restaurant	10,000 sf	50 gal/ksf	1.5	750	0.8
	Hospital and Clinic or Research and Development	165,200 sf	250 gal/ksf	1.5	61,950	69.4
	Up to five levels of subterranean parking	571,303 sf	20 gal/ksf	1.5	17,139	19.20
Existing Housing Site	Residential Multiple-Unit Structures (Multi-Family Housing)	10 du (existing to remain)	150 gal/du	1.5	2,250	2.5
MUBL Site	Residential Multiple-Unit Structures (Multi-Family Housing)	10,000 sf (15 du)	150 gal/du	1.5	3,375	3.8
	Restaurant	800 sf	50 gal/ksf	1.5	60	0.1
	Up to two levels of subterranean parking	7,200 sf	20 gal/ksf	1.5	216	0.24
				TOTAL (GROSS)	222,634	249.49
				EXISTING	**25,722**	**29**
				TOTAL (NET)	196,912	220.49

Acronyms/Abbreviations: sf = square feet; ksf = 1,000 sf; gal = gallon; gpd = gallons per day; du = dwelling unit

[a] Todd Groundwater, Water Supply Assessment for Providence Saint John's Health Center Phase II Project, July 2018.

SOURCE: ESA, April 2019.

Wastewater

Would the Project require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects?

Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Similar to the Project, Alternative 2 would construct hospital/health care, medical research, medical office, neighborhood commercial, residential, restaurant, and day care uses that would result in a net increase in wastewater flows requiring treatment by the HTP. Wastewater discharges under both the Project and Alternative 2 would be typical of the wastewater already generated at the PSJHC campus; it would not include large quantities of any unusual industrial/hazardous discharges (such as sometimes associated with large industrial facilities, oil refineries, etc.) that can sometimes interfere with the ability of a treatment plant meeting its water quality requirements. Furthermore, LARWQCB, via the NPDES program, has imposed requirements wastewater treatment that Alternative 2 and the Project would meet through treatment at the HTP that includes full secondary treatment. Given the above, and because the discharges from the HTP would be required to meet LARWQCB wastewater treatment requirements, Alternative 2, like the Project, would not exceed wastewater treatment requirements of the applicable RWQCB, and the impact would be less than significant. Because Alternative 2 would generate less wastewater than the Project, the level of the impact would be less under this alternative.

Alternative 2 would result in a net increase in development at the Project Site of 400,395 square feet of floor area (exclusive of structured parking), as compared to 571,945 square feet under the Project. This increase in development would generate an increase in wastewater generation requiring conveyance and treatment under both the Project and Alternative 2. **Table 5-8**, *Alternative 2 – Estimated Wastewater Generation*, provides an estimate of wastewater generation under Alternative 2. As indicated, Alternative 2 would generate a net increase in wastewater of an estimated 184,027 GPD (compared to up to 154,158 GPD under the Project).

The Project Site is currently served by three existing 12-inch sewer lines, one each in Santa Monica Boulevard, 20th Street, and Broadway. Each of these lines serves a different portion of the Project Site. As indicated in Section 4.19, *Wastewater*, wastewater flows under the Project would not exceed the City's flow threshold (e.g., 50 percent of full capacity) in the 20th Street line, but would exceed this threshold in both the Broadway and Santa Monica Boulevard lines. Adequate wastewater conveyance capacity would be available under the Project and Alternative 2 with: (1) the proposed upsizing of a portion of the Broadway line; and (2) implementation of Mitigation Measure MM-WW-1 with regards to the Santa Monica line.

TABLE 5-8
ALTERNATIVE 2 – ESTIMATED WASTEWATER GENERATION

Development Site	Uses	Floor Area/ Units per Use	Wastewater Generation Factor[a]	Wastewater Generation (GPD)
2I	Medical Office	63,000 sf	250 gal/ksf	23,625
	General Retail Sales, Small-Scale	4,500 sf	50 gal/ksf	338
	Up to four levels of subterranean parking	171,984	20 gal/ksf	3,440
2C	Hospital and Clinic Research and Development	62,300 sf	250 gal/ksf	23,363
	General Retail Sales, Small-Scale	5,500 sf	50 gal/ksf	413
	Up to four levels of subterranean parking	118,265 sf	20 gal/ksf	2,365
2D/E	Hospital and Clinic, Research and Development	55,500 sf	250 gal/ksf	20,813
	General Retail Sales, Small-Scale	3,000 sf	50 gal/ksf	225
	Up to four levels of subterranean parking	115,729	20 gal/ksf	2,315
South Campus West of 21st Street South S1	Hospital and Clinic (Child & Family Development Center)	42,900 sf	250 gal/ksf	16,086
	Child Care and Early Education Facilities	9,000 sf – 15,000 sf	120 gal/ksf	2,700
	Up to five levels of subterranean parking (includes. S3)	303,973 sf (incl. S3)	20 gal/ksf	6,079
South Campus West of 21st Street North S3	Hospital and Clinic or Research and Development	73,750 sf	250 gal/ksf	27,657
	Restaurant	5,000 sf	50 gal/ksf	375
	Up to five levels of subterranean parking (included with S1, above)	(Included in S1)	20 gal/ksf	-
South Campus East of 21st Street S2, S4, S5 excluding MUBL Site and existing Multi-Family Housing	General Retail Sales, Small-Scale Restaurant	10,000 sf	50 gal/ksf	750
	Hospital and Clinic or Research and Development	165,200 sf	250 gal/ksf	61,950
	Up to five levels of subterranean parking	571,303 sf	20 gal/ksf	11,426
Existing Housing Site	Residential Multiple-Unit Structures (Multi-Family Housing)	10 du (existing to remain)	150 gal/du	2,250
MUBL Site	Residential Multiple-Unit Structures (Multi-Family Housing)	10,000 sf (15 du)	150 gal/du	3,375
	Restaurant	800 sf	50 gal/ksf	60
	Up to two levels of subterranean parking	7,200 sf	20 gal/ksf	144
			TOTAL (GROSS)	209,749
			EXISTING	**25,722**
			TOTAL (NET)	**184,027**

Acronyms/Abbreviations: sf = square feet; ksf = 1,000 sf; gal = gallon; gpd = gallons per day; du = dwelling unit

[a] Todd Groundwater, Water Supply Assessment for Providence Saint John's Health Center Phase II Project, July 2018.

SOURCE: ESA, April 2019.

With regards to wastewater treatment capacity, as indicated in Section 4.19, the HTP has a dry weather capacity of 450 mgd, currently treats 275 mgd, and has a remaining available capacity 175 mgd. The net increase in sewage associated with the Project would be up to approximately 0.09 of the remaining available capacity of the HTP, compared to approximately 0.105 percent under Alternative 2. Because this would represent a minimal increase in the demand for treatment capacity, and because the required treatment capacity is available, no expansion of wastewater treatment capacity would be required under either the Project and Alternative 2.

The environmental effects of construction of the on-site wastewater infrastructure required to serve both the Project and Alternative 2 is subsumed in the impact analyses for the other environmental topics evaluated in this EIR (e.g., air quality, noise, etc.). Also, the environmental effects of the construction of the required off-site sewer line improvements would be minimal owing to their limited area of disturbance, their location within the rights-of-way of the surrounding streets, and implementation of the proposed Construction Traffic Management Program. Therefore, neither the Project or Alternative 2 would require or result in the construction of new wastewater facilities or the expansion of existing facilities, the construction of which would cause significant environmental effects. The impacts of both the Project and Alternative 2 would be less than significant, with the level of impacts similar.

Solid Waste

Would the Project generate solid waste in excess of State or local standards or in excess of the capacity of the local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

As indicated in Section 4.20, *Solid Waste*, the Project would generate an estimated 302,027 tons of construction solid waste and 0.93 tons per day of operational solid waste. The construction solid waste would require disposal at the County's only operating inert landfill (Azusa Land Reclamation) or at any of a number of IDEFOs in the County such as the Arcadia Reclamation Facility, while the operational solid waste would require disposal at one or more of the 12 Class III landfills currently serving the City. Because this solid waste would represent only approximately 0.54 percent and 0.002 percent, respectively, of the remaining construction and operational solid waste disposal capacity at these facilities, sufficient permitted solid waste disposal capacity is available to serve the Project, and impacts would be less than significant. Alternative 2 would include less development than the Project, and therefore generate less construction and operational solid waste. Therefore, impacts would also be less than significant under Alternative 2, with the level of the impacts less than under the Project owing to less demand for disposal capacity under this alternative.

Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Both the Project and Alternative 2 would be implemented in compliance with applicable federal, state, and local statutes and regulations related to solid waste. In accordance with SMMC Section 8.108.010, the Applicant would submit a WMP for C&D waste meeting City requirements as part

of the application packet for demolition permits and construction will achieve at least a 70 percent solid waste diversion rate. With regard to waste generated during operation, both the Project and Alternative 2 would provide refuse and recycling bins to accommodate the solid waste streams generated by the proposed uses, and would house these bins in enclosed refuse areas in compliance with SMMC Section 9.21.130 (Resource Recovery and Recycling Standards). In accordance with Assembly Bill 1826, separate recycling bins for organic waste would be provided, and arrangements would be made for organic waste recycling services. Therefore, the impacts of the Project and Alternative 2 would be less than significant, with the level of the impacts generally similar.

5.6.2.3 Relationship of the Alternative to the Project Objectives

Alternative 2 proposes development of the Phase II Development Sites with similar healthcare and related uses to the Project, except at Tier 1 densities and heights, thereby resulting in less building floor area. In addition, this alternative would be developed without the publicly accessible open space, modification of the existing street network, the pedestrian bridge over Santa Monica Boulevard, and the below-grade tunnels connecting the parking garages of the Project.

Alternative 2 would mostly meet all of the Project objectives. It would mostly meet Objective 1 – Health Care and Related Uses and Facilities, by ensuring that PSJHC functions as part of an integrated health services delivery system that provides a range of care for Santa Monica and surrounding communities by providing state-of-the-art acute care, outpatient (ambulatory) treatment, health and medical research, illness and disease prevent, community health education, and patient and facility support services and facilities. It would partially meet Objective 2 – Required Uses and Facilities, but ensuring that PSJHC provides child care and replacement housing in accordance with the DA. It would partially meet Objective 3 – Phase II Master Plan Development Program, by developing a comprehensive Master Plan for Phase II of the PSJHC Campus and a Development Program that are designed to achieve the other Project objectives, accommodate the uses vested by the DA, integrate the campus, ensure that acute care, outpatient treatment and related services are situated near each other, partially meet the 35 percent open space objective of the Project, and ensure that PSJHC remains in continuous operation as a hospital and health care facility during development. It would mostly meet Objectives 5 – Parking, and 6 – Minimizing VMT, by providing sufficient parking to meet PSJHC peak parking demand, implementing a TDM program, and providing a complimentary mix of land uses. It would meet Objective 7 – Minimize Phase II Impacts, by ensuring that the Phase II Phasing Plan and schedule minimize impacts on PSJHC neighbors and existing uses to the extent reasonably feasible.

However, Alternative 2 would not be as effective in meeting some of the objectives as the Project because it would not: (1) provide the range and/or extent of medical services to be provided under the Project due to the elimination of the proposed Education and Conference Center and Visitor Housing (Objective 1); (2) accommodate all the Phase II development vested by the DA or provide 35 percent of the Project Site as open space (Objective 3); (3) provide the extent of pedestrian connections or extent of bicycle and pedestrian friendliness that would be provided under the Project (Objective 4) since the existing street network would remain in place; or (5) reduce VMT to the same extent of the Project due to lower-density development than the Project in close proximity to transit (Objective 5). It would be more effective than the Project in minimizing impacts

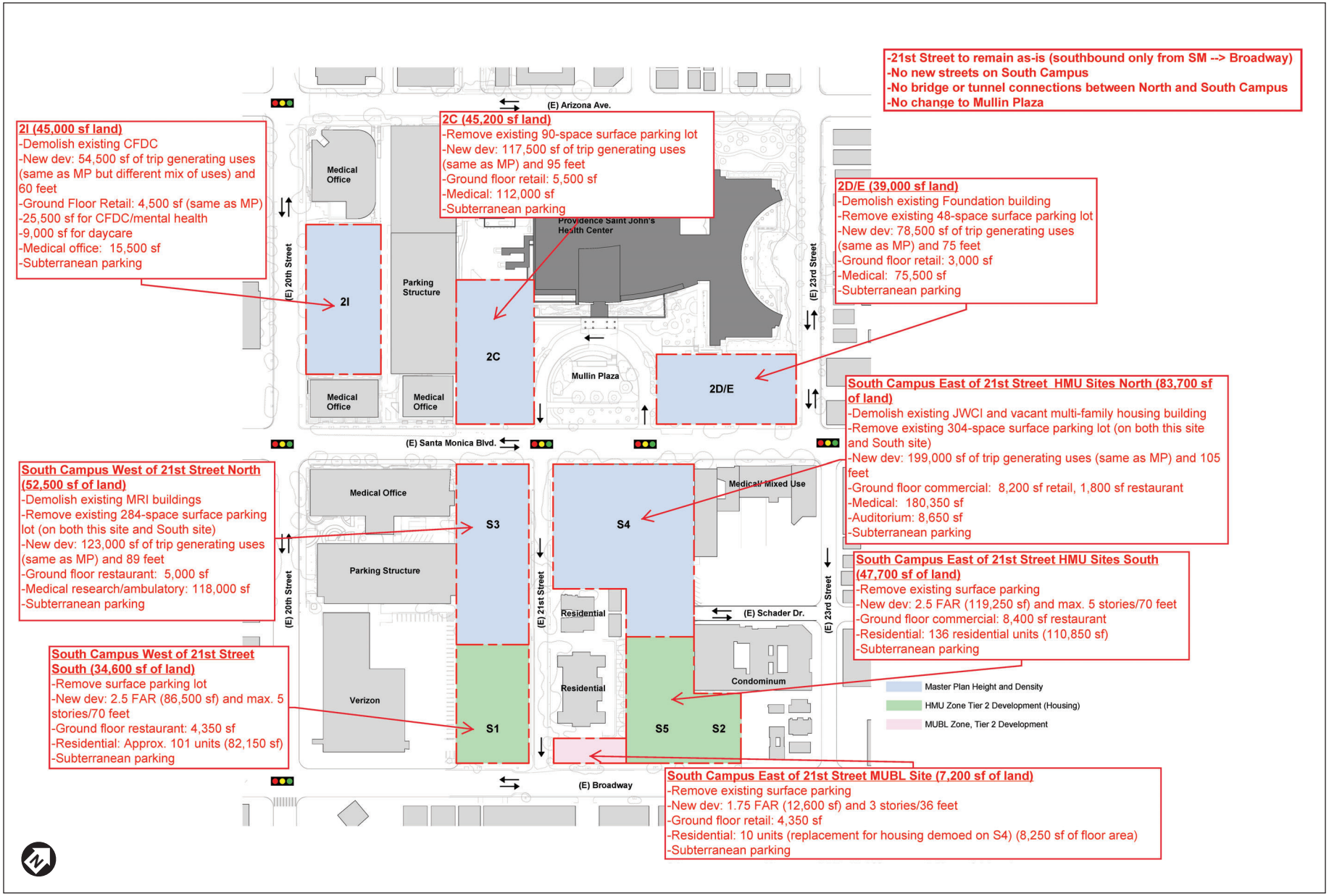
on PSJHC neighbors (Objective 7) due to less development and thus less construction and operational activities and vehicle trips.

Overall, Alternative 2 would be less effective than the Project in meeting the Project objectives.

5.6.3 Alternative 3 – Reduced Healthcare Uses with Tier 2 Housing on South Campus

5.6.3.1 Description of the Alternative

This alternative represents a reduction in the healthcare uses compared with the Project and a reduction in open space, with an overall increase in the total floor area to accommodate residential development on the South Campus in response to public comments received during the preliminary hearings and NOP scoping meeting to explore adding housing as part of the Phase II Master Plan. Under Alternative 3, total development on the North Campus is assumed to be consistent with the Master Plan, with variations in the proposed uses to accommodate replacement of the Child and Family Development Center, including its Daycare uses, on Site 2I (rather than moving the Child and Family Development Center to a new building on the South Campus along Broadway). The northern portion of the South Campus (along Santa Monica Boulevard) would be developed with healthcare uses in buildings with similar setbacks, densities and heights as the Phase II Master Plan. On the southern portion of the South Campus, development would be primarily multi-family housing (247 multi-family units, including 10 replacement units) at Tier 2 densities and heights with a significant reduction of open space on the South Campus. No Visitor Housing would be developed under Alternative 3. In addition, the existing street network would remain as is. There would be no new streets such as 20th Place and Saint John's Way and, the northern portion of 21st Street would not be vacated. Furthermore, the above-grade pedestrian connections over Santa Monica Boulevard and the tunnels beneath Santa Monica Boulevard would not be constructed. In contrast to the Project, this alternative would not require relocation of the existing utilities. The development at the Project Site under this alternative is specified further in **Figure 5-2** and **Table 5-9**, and is discussed further below. As indicated therein, this alternative would include 809,650 square feet of new floor area (including 247 du), or a net increase of 699,595 square feet (including 247 du), with the maximum building heights the same as the Project (except in PAs S1 and S2 where they would be approximately 30 ft greater).



SOURCE: Perkins Eastman, October 2018

Providence Saint John's Health Center Phase II Project

Figure 5-2
Alternative 3 – Reduced Master Plan w/Housing on South Campus

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TABLE 5-9
ALTERNATIVE 3 (REDUCED HEALTHCARE USES WITH TIER 2 HOUSING ON SOUTH CAMPUS) - DEVELOPMENT SUMMARY

Development Site	Uses	Floor Area/ Units per Use	Max. Building Floor Area	Max. Height
2I	Child and Family Development Center	25,500 sf	73,300 sf of building floor area	60 feet
	Daycare	9,000-15,000 sf		
	Medical Office	15,500 sf		
	Health-Related Services, Restaurant, or Neighborhood Commercial	4,500 sf		
	Up to four levels of subterranean parking			
2C	Hospital/Health Care, Medical Research, and/or Health & Wellness Center	112,000 sf	117,500 sf	95 feet
	Health-Related Services , Restaurant, or Neighborhood Commercial	5,500 sf		
	Up to four levels of subterranean parking			
2D/E	Hospital/Health Care Medical Research and/or Health & Wellness Center	75,500 sf	78,500 sf	75 feet
	Health-Related Services Restaurant or Neighborhood Commercial Uses	3,000 sf		
	Up to four levels of subterranean parking			
South Campus West of 21st Street South (S1)	Multi-Family Housing	82,150 sf (101 du)	86,500 sf	70 feet
	Restaurant or Neighborhood Commercial	4,350 sf		
	Up to five levels of subterranean parking			
South Campus West of 21st Street North (S3)	Hospital/Health Care, Medical Research, and/or Health & Wellness Center	118,000 sf	123,000 sf	89 feet
	Health-Related Services, Restaurant, or Neighborhood Commercial	5,000 sf		
	Up to five levels of subterranean parking			
South Campus East of 21st Street North (S4)	Hospital/Health Care, Medical Research, or Health & Wellness	180,350 sf	199,000 sf	105 feet
	Health-Related Services, Restaurant, or Neighborhood Commercial	8,200 sf		
	Restaurant	1,800 sf		
	Auditorium	8,650 sf (250 seats)		
	Up to five levels of subterranean parking			
South Campus East of 21st Street South (S5/S2)	Multi-Family Housing	110,850 sf (136 du)	119,250 sf	70 feet
	Restaurant or Neighborhood Commercial	8,400 sf		
	Up to five levels of subterranean parking			
South Campus East of 21st Street MUBL Site	Multi-Family Housing	8,250 sf (10 du)	12,600 sf	36 feet
	Restaurant or Neighborhood Commercial	4,350 sf		
	Up to two levels of subterranean parking			
		TOTAL (GROSS)	**809,650 sf (includes 247 du)**	
		TOTAL (NET)	**699,595 sf (includes 247 du)**	

Site 2I: 20th Street Medical Building

Alternative 3 would demolish the existing Child & Family Development Center at Site 2I, which is approximately 34,670 square feet, and develop a new medical office/Child & Family Development Center building on the approximately 45,000-square-foot-2I site. As with the Project, the 2I building would have a maximum of 54,500 square feet of trip generating uses with a maximum building area of 73,300 square feet. For the purposes of a worst case analysis, this alternative assumes 4,500 square feet of ground floor Health-Related Services, Restaurant, or Neighborhood Commercial Uses (same as Project), 25,500 square feet of Child and Family Development Center /healthcare uses (same as the amount of Child and Family Development Center uses assumed on Site S1 in the Project), 9,000 square feet of Daycare uses (same as the amount of Daycare assumed on Site S1 in the Project), and 15,500 square feet of Medical Office (a reduction of 34,500 square feet of Medical Office compared with the Project. Similar to the Project, the maximum height of the building would be 60 feet, site access to the 2I site would be from 20th Street and there would be up to four levels of subterranean parking. The Child & Family Development Center, including both the Child & Family Development Center uses and the Daycare uses, would need to be temporarily moved to an off-site location during construction of the new Child & Family Development Center.

Site 2C: West Ambulatory & Acute Care Building

Similar to the Project, Alternative 3 would remove the existing surface parking (West Lot) and landscaping in the North Campus and construct a Revised Alternative 3 West Ambulatory & Acute Care Building with subterranean parking on the approximately 45,200-square-foot 2C site. As with the Project, the Revised Alternative 3 West Ambulatory & Acute Care Building (2C) would be a maximum of 117,500 square feet containing a mix of Hospital/Health Care, Medical Research and/or Health & Wellness Center uses and ground floor Health-Related Services, Restaurant or Neighborhood Commercial Uses. For the purposes of a worst case analysis and consistent with the Master Plan, it is assumed that 2C would include a maximum of 112,000 square feet of Hospital/Health Care or Medical Research Uses and 5,500 square feet of ground-level Health-Related Services, Restaurant or Neighborhood Commercial Uses. The maximum building height would be 95 feet. There would be up to four levels of subterranean parking beneath the West Ambulatory & Acute Care Building (2C). Unlike the Project, the Mullin Plaza egress driveway would remain at its current location (and would not be rerouted through the 2C site). Vehicular access to the 2C site would be provided through both the existing Mullin Plaza driveway and a new curb cut on Santa Monica Boulevard on Site 2C.

Sites 2D/E: East Ambulatory & Acute Care Building

Similar to the Project, the development program for Site 2D/E under Alternative 3 includes the demolition of the single-story office building located at 2221 Santa Monica Boulevard (currently used by the Saint John's Health Center Foundation), and the existing surface parking lots, followed by the construction of a Revised Alternative 3 East Ambulatory & Acute Care Building and associated subterranean parking on the approximately 39,000-square-foot 2D/E site.

As with the Project, the Revised Alternative 3 East Ambulatory & Acute Care Building (2D/E) would have a maximum of containing a mix of Hospital/Health Care Medical Research and/or

Health and Wellness Center uses and ground-floor Health-Related Services, Restaurant or Neighborhood Commercial Uses. For the purposes of a worst case analysis and consistent with the Master Plan, it is assumed that 2D/E would include a maximum of 75,500 square feet of Hospital/Health Care Uses and 3,000 square feet of ground-level Health-Related Services, Restaurant or Neighborhood Commercial Uses for a total of 78,500 square feet. The maximum height of the building would be 75 feet. There would be up to four levels of subterranean parking beneath the Revised Alternative 3 East Ambulatory & Acute Care Building (2D/E). In contrast to the proposed Master Plan, there would be no changes to Mullin Plaza (Mullin Plaza would not be expanded onto the 2D/E site). Additionally, there would be no 1,500-square-feet Mullin Plaza Café. Vehicular access to the 2D/E site would be provided by the existing Mullin Plaza driveway and a modified curb cut on 23rd Street.

South Campus West of 21st Street South (S1)

Alternative 3 would remove the existing surface parking lot and develop approximately 34,600 square feet of property located on the southern portion of the South Campus west of 21st Street (i.e., generally the S1 site) with mixed use housing and ground floor Restaurant or Neighborhood Commercial Uses at the HMU Tier 2 standards. Based on the Tier 2 FAR of 2.5, this area would be developed with a maximum 86,500 square feet of uses consisting of 101 units (82,150 square feet) and 4,350 square feet of ground-level retail/restaurant uses. The maximum height would be 70 feet (5 stories). Similar to the Project, a subterranean parking garage with up to five levels of underground parking would be provided. Unlike the Project, site access to Site S1 would be provided directly from either or both 21st Street and Broadway. There would be a reduction in open space on this site compared with the Project.

South Campus West of 21st Street North (S3)

The northern portion of the South Campus west of 21st Street includes the existing temporary MRI Building and existing surface parking lot comprising approximately 52,500 square feet of land area. Alternative 3 would demolish these uses and replace them with 118,000 square feet of Hospital/Health Care, Health & Wellness Center uses and/or Medical Research space and 5,000 square feet of ground-floor Health-Related Services, Restaurant, or Neighborhood Commercial Uses. Similar to the Project, the maximum floor area would be 123,000 square feet. The maximum building height would be 89 feet. Similar to the Project, a subterranean parking garage with up to five levels of underground parking would be provided. Unlike the Project, site access to Site S3 would be provided directly from either or both 21st Street or Santa Monica Boulevard.

South Campus East of 21st Street North (S4)

Alternative 3 would develop approximately 83,700 square feet of property within the northern portion of the South Campus, generally encompassing the property east of 21st Street (including the existing 10-unit vacant multifamily housing site at 1427-1433 21st Street, which would be demolished). Alternative 3 would also demolish the existing John Wayne Cancer Institute building and surface parking. Similar to the Project, Alternative 3 would develop a total of 199,000 square feet, consisting of 8,200 square feet of Neighborhood Commercial Uses and/or Health-Related Services, 1,800 square feet of Restaurant uses, 180,350 square feet of Hospital/Health Care,

Medical Research, or Health & Wellness Center uses, and 8,650 square feet of auditorium. The maximum building height would be 105 feet.

As compared to the Project, Alternative 3 would provide significantly less open space area. There would be no Saint John's Square along Santa Monica Boulevard or the 900-square-foot Saint John's Café with outdoor dining. Additionally, this alternative would not include the Project's proposed Sun Garden open space located approximately in the middle of the South Campus property east of 21st Street adjacent to the existing residential uses to the east (1440 23rd Street condominiums) and west of the site (1423 21st Street apartments and Geneva Plaza senior housing building).

Similar to the Project, a subterranean parking garage with up to five levels of underground parking would be provided. Unlike the Project, site access to Site S4 would be provided directly from either or both Santa Monica Boulevard and 21st Street.

South Campus East of 21st Street South (S5/S2)

Alternative 3 would demolish the existing surface parking to develop approximately 47,700 square feet of property within the southern portion of the South Campus, east of 21st Street (excluding the MUBL Site). Per the HMU Tier 2 standards, Alternative 3 would develop a total of 119,250 square feet, consisting of 8,400 square feet of ground floor Restaurant or Neighborhood Commercial Uses, and 110,850 square feet (136 units) of residential uses. The maximum building height would be 70 feet (5 stories).

In comparison to the Project, Alternative 3 would have additional ground floor Restaurant or Neighborhood Commercial Uses with the remaining square footage dedicated to residential uses. Additionally, this alternative would not include the Project's proposed Sun Garden open space located approximately in the middle of the site adjacent to the existing residential uses to the east (1440 23rd Street condominiums) and west of the site (1423 21st Street apartments and Geneva Plaza senior housing building). The alternative would also not include the Project's proposed open space on the northern portion of Site S2 (adjacent to the 1440 23rd Street condominiums) or the South Garden open space along Broadway (in front of the Geneva Plaza senior housing building).

Similar to the Project, a subterranean parking garage with up to five levels of underground parking would be provided. Unlike the Project, site access to Site S5/S2 would be provided directly from Broadway.

South Campus East of 21st Street MUBL Site

Alternative 3 would develop the approximately 7,200 square feet MUBL zoned property within the South Campus, east of 21st Street, which is currently surface parking. At the Tier 2 standards, Alternative 3 would develop a total of 12,600 square feet, consisting of 10 units of replacement multi-family apartments (8,250 square feet of Multi-Family Housing) and 4,350 square feet of ground floor Restaurant and/or Neighborhood Commercial Uses. The maximum height would be 36 feet (3 stories). Unlike the Project, a subterranean parking garage with up to two levels of underground parking would be provided and site access to the MUBL site would be provided directly from Broadway.

5.6.3.2 Environmental Impacts

Aesthetics

The following aesthetics analysis pertinent to scenic vistas, scenic resources, light and glare, and shading is provided for informational purposes only, since impacts are less than significant for employment projects within urban areas, pursuant to PRC Section 21099(d)(1). See Section 4.1, *Aesthetics*, of this EIR for further discussion of PRC Sections 21099(d)(1) and (d)(2)(A).

Would the project have a substantial adverse effect on a scenic vista?

As described in Section 4.1, due to distance and intervening topography, views of the Pacific Ocean are limited from east to west corridors along Santa Monica Boulevard, Broadway, and Arizona Avenue near the Project Site. Limited views of the Santa Monica Mountains to the north are available from north and south corridors such as 23rd Street and 20th Street adjacent to the Project Site. There are no protected views or view corridors within the Project area and no scenic vistas across the Project Site.

Under Alternative 3, the amount and height of the proposed development on the North Campus and the northern portion of the South Campus would be roughly similar to the Project, while the amount and height of development in the southern portion of the South Campus would be greater. More specifically, Alternative 3 would include approximately 132,000 square feet more development (mostly residential) in Sites S1, S2 and S5, and a maximum building height for Sites S1 and S2 that would be approximately 30 feet taller than under the Project. In addition, Alternative 3 would not include as much open space in the southern portion of the South Campus as the Project or the proposed pedestrian bridge over Santa Monica Boulevard.

Given the above, development under Alternative 3 would be slightly more noticeable from some public vantage points than under the Project. However, as previously stated, no scenic vistas of the Santa Monica Mountains to the north or the Pacific Ocean to the west currently exist across the Project Site. Therefore, neither the Project nor Alternative 3 would have substantial adverse effects on scenic vistas, with the impact similar to the Project due to the absence of nearby scenic vistas.

Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway or a locally-designated scenic corridor?

The Project Site is not located on or near a State scenic highway or locally-designated scenic corridor. Furthermore, while there are several off-site historic resources within the viewshed of the Project Site, neither the Project or Alternative 3 would impact these resources or materially impact the setting in which these resources occur. Both the Project and Alternative 3 would remove two buildings eligible as local historic resources (e.g., John Wayne Cancer Institute and the Child & Family Development Center), which are considered excellent examples of Mid-Century Modern medical buildings. However, the loss of these resources from an aesthetic perspective would be off-set to some degree under both the Project and Alternative 3 by new construction exhibiting high quality architecture, landscape design, and increased open space, and in accordance with

21099(d)(1), this impact is not identified as significant under either the Project or Alternative 3. Both the Project and Alternative 3 would have the same level of impacts since no scenic resources would be damaged.

Would the project conflict with applicable zoning and other regulations governing scenic quality?

As indicated in Section 4.1, Aesthetics, although the Project would alter the visual character of the Project Site due to development of new buildings, open space, and infrastructure, the Project Site is already urbanized. As discussed in Section 4.1, the Project would be consistent with applicable zoning and other regulations that govern scenic quality including LUCE policies.

As with the Project, Alternative 3 would be subject to architectural design review by the Architectural Review Board (ARB), in accordance with SMMC Section 9.55 (architectural review). Consistent with ARB review, findings will be made demonstrating that new development shall ensure the preservation of neighborhood environments; enhancement of the area's cultural, social, and aesthetic character with interfacing open spaces, reconciliation of disparate architectural elements with adjoining neighborhood communities: unification in patterns and standards of architectural development within the entire district.

While Alternative 3 would result in taller development in the southern portion of the South Campus than the Project, Alternative 3 would not expand Mullin Plaza or include the Mullin Plaza café with outdoor dining. It would not include Saint John's Square or the 900 Saint John's Café with outdoor dining, Sun Garden open space adjacent to the 1440 E. 23rd Street condominiums, or the South Garden and other open space adjacent to the 1423 21st Street apartments and Geneva Plaza senior housing building. As with the Project, Alternative 3 would be consistent designed to be consistent with objectives of the HASP to support harmony of design within the PSJHC campus and between the medical campus and the surrounding community. Because Alternative 3 would not provide the Project's same level of pedestrian improvements or landscaped open space, which soften visual effects and buffer adjacent disparate uses in accordance with LUCE and the HASP, impacts related to aesthetics would be greater under Alternative 3 than under the Project.

Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Both the Project and Alternative 3 would create new sources of light and glare. However, while there are several light-sensitive uses in the immediate vicinity, the Project Site and surrounding area is already a lit urban environment. Furthermore, all proposed new exterior light sources would be shielded, and all proposed lighting and exterior building facades would be required to comply with SSMC requirements and undergo City architectural review. Therefore, neither the Project or Alternative 3 would create new sources of substantial light or glare that could adversely affect day or nighttime views in the area. Impacts would be greater under Alternative 3 owing to more development in the southern portion of the South Campus under this alternative.

Would the project create shading effects that would interfere with the use of outdoor open space or solar accessibility?

As indicated in Section 4.1, the Project would not shade any existing shadow-sensitive uses in the vicinity (e.g., Berkley East Convalescent Hospital, small apartment buildings and single-family residences along Arizona Avenue and 21st Street, McKinley Elementary School, etc.) for more than 3 hours during the winter or for more than 4 hours during the remaining seasons. Thus, the Project would not create shading effects that could interfere with the use of outdoor open space or solar accessibility. Development on the North Campus and the northern portion of the South Campus under Alternative 3 would be roughly the same as under the Project, and would result in roughly the same less than significant shading impacts. However, within the southern portion of the South Campus under Alternative 3, there would be both more development and lesser setbacks at Sites S1, S2 and S5, and taller buildings at Sites S1 and S2, than under the Project. It is not anticipated that this greater development under Alternative 3 would shade the small apartment buildings east of 21st street during the Fall and Spring Equinoxes or the Summer Solstice the substantial distances between the 4+ hour shadows during these seasons under the Project and the apartments as indicated in Figure 4.1-15 through 4.1-17 in Section 4.1. However, as indicated in Figures 4.1-14, the 3+ hour Winter Solstice shadows under the Project would extend to as close as several feet from the two northerly apartment buildings and as close as 20 ft from the southerly apartment building. It is anticipated that under Alternative 3, the greater amount of development in Sites S1, S2 and S5 and the greater maximum building heights in Sites S1 and S2 would lead to 3+ hours of shading of all three apartment buildings. This would represent an exceedance of the winter shading threshold that would not occur under the Project. Nonetheless impacts would be less than significant per PRC Section 21099(d)(1).

Air Quality

Would the project conflict with or obstruct implementation of the applicable air quality plan?

Both Alternative 3 and the Project would generate emissions that would contribute to basin-wide air pollutants emissions, including construction NO_x and PM10 and operational NOx emissions that exceed SCAQMD thresholds before mitigation, and operational NO_x emissions that exceed SCAQMD thresholds after mitigation. The contributions to basin-wide air pollutant emissions would be partially offset in that both the Project and Alternative 3 would: (1) comply with SCAQMD Rule 403 requirements during construction; and (2) represent "sustainable growth" in close proximity to mass transit consistent with SCAG RTP/SCS and SB 375 goals to reduce VMT per capita. Therefore, similar to the Project, Alternative 3 would also not conflict with or obstruct implementation of the applicable air quality plan.

Would the project 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?

Regional Construction Emissions

Under Alternative 3, construction activities at the Project Site would be increased slightly from those that would occur under the Project owing to the greater amount of new development under this alternative. This includes a greater amount of subterranean development at Site 2 (five levels of subterranean parking compared to two under the Project) which would require more excavations and soil export than under the Project. However, the maximum amount of construction activities during any single day would be expected to be similar between the Project and Alternative 3 such that, like the Project, regional construction emissions for most criterial pollutants would be less than significant under this alternative, with regional construction emissions of NOx less than significant with compliance with SCAQMD Rule 403 (Control of Fugitive Dust) and implementation of Mitigation Measure MM-AIR-1. The level of impacts would be slightly greater under Alternative 3 owing to more construction activity under this alternative.

Regional Operational Emissions

Operational emissions were assessed for area, energy, mobile, and stationary sources under the Project in Section 4.2, *Air Quality*, with emissions from mobile sources (vehicle trips) making up the largest component of the operational emissions. Under Alternative 3, the net increase in development at the Project Site would be 699,595 square feet versus 571,945 square feet under the Project, an increase of approximately 18 percent. This would translate into an increase in the number of weekday net vehicle trips to/from the Project Site of from 9,826 to 11,236 trips, with an associated increase in regional operational emissions. Because of the increased floor area under Alternative 3, area, energy and stationary source emissions would also be greater. Similar to the Project, Alternative 3 would be required to meet regulatory energy efficiency requirements and would reduce regional VMT and associated mobile source emissions given its infill nature and proximity to mass transit facilities. Still, like the Project, regional operational emissions associated with Alternative 3 would exceed SCAQMD significance thresholds for NO_x given the substantial exceedance of the NOx threshold under the Project (e.g., 96 lbs/day vs. the threshold of 55 lbs/day). Impacts would significant unavoidable under both the Project and Alternative 3, with impacts greater under Alternative 3.

Would the project expose sensitive receptors to substantial pollutant concentrations?

Localized Emissions

Section 4.2, *Air Quality* addresses the Project's impacts from construction and operational air pollutant emissions on nearby sensitive receptors. It also evaluates health risks due to toxic air contaminants (TACs) such as diesel emissions (DPM) from haul and delivery trucks. The analysis concludes that the potential increase in NO_x, PM10 and TACs during construction of the Project would exceed applicable daily SCAQMD significance thresholds at the nearest sensitive receptor locations before mitigation, with these construction impacts less than significant after mitigation. As described previously, construction and operational vehicle trips and activities would be greater under Alternative 3 than under the Project. Thus, like the Project, worse-case daily construction NO_x, PM10 and TAC levels at the nearest sensitive receptor locations would be less than significant after mitigation (MM-AIR-1). While maximum daily construction impacts would be similar to the

Project, construction impacts are considered greater under this alternative due to the increase in overall construction duration.

Carbon Monoxide Hotspots

Like the Project, Alternative 3 would generate operational vehicle trips that would incrementally increase CO levels at intersections and roadways within one-quarter mile of sensitive receptors. However, as indicated in Section 4.2, *Air Quality*, the Project would not cause or contribute to an exceedance of the CAAQS one-hour or eight-hour CO standards of 20 or 9.0 parts per million, and the impact would be less than significant. While Alternative 3 would result in more operational vehicle trips than the Project, Alternative 3 like the Project, would be well below the applicable CO screening threshold levels and the worse-case intersections subject to CO hotspots are far below peak vehicle volumes that would cause such an impact. Therefore, impacts would be less than significant under both the Project and Alternative 3. As compared to the Project, the level of the impacts would be greater under Alternative 3 due to the proportionate increase in vehicle trips.

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

Like the Project, Alternative 3 would include hospital/healthcare-related, medical office, medical research, commercial, and residential land uses that would not be expected to introduce substantial sources of odors. Refuse and recycling bins would be covered in enclosed storage areas and properly maintained to prevent adverse odors, and proper housekeeping practices would be implemented to promote odor control. Therefore, like the Project, construction and operation of Alternative 3 would not create odors affecting a substantial number of people, and impacts would be less than significant. Given that neither the Project or Alternative 3 would include the types of uses that would create objectionable odors affecting a substantial number of people (e.g., oil refineries, wastewater treatment plants, landfills, etc.), the impacts of Alternative 3 would be similar to the Project.

Construction Effects

Would construction of the project result in considerable construction-period impacts due to the scope, or location of construction activities?

Similar to the Project, Alternative 3 would include construction activities that would generate temporary aesthetics effects and air emissions, noise/vibration, and vehicle trips. Alternative 3 would include approximately 122 percent of the net new development as the Project, and thus would most likely generate approximately 22 percent less total construction activities and associated aesthetics effects, air emissions, noise/vibration, and vehicle trips than the Project. However, the maximum amount of construction-related air emissions, noise/vibration and vehicle trips on a peak construction day would be expected to be similar between the Project and Alternative 3. Therefore, similar to the Project, the construction-related aesthetics, air quality, and construction traffic impacts of Alternative 3 would be less than significant after mitigation, while construction noise impacts to off-site sensitive medical uses would remain significant and

unavoidable. Overall, the level of impacts would be greater under this alternative owing to more total construction activities.

Historical Resources

Would the project cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5?

As analyzed in Section 4.4 *Cultural Resources – Historical Resources*, he John Wayne Cancer Institute and CFDC appear eligible for federal, state, and local listing, and as such meet the definition of historical resources as outlined in CEQA Guidelines Section 15064.5(a). Additionally, there are four off-site historical resources that have views of the Project Site (Santa Monica Doctors Office at 2125 Arizona Avenue, a corner commercial building at 2301 Santa Monica Boulevard, Kingsley Gates Mortuary at 1925 Arizona Avenue, and McKinley Grammar School at 2401 Santa Monica Boulevard). These four resources are eligible for local listing, and as such meet the definition of historical resources as outlined in CEQA Guidelines Section 15064.5(a).

Like the Project, Alternative 3 would: (1) demolish the John Wayne Cancer Institute and CFDC buildings which would represent a significant unavoidable impact and (2) would result in a less than significant vibration impact to the New Medical Arts Annex (a potentially historic building) after mitigation. Because both the Project and Alternative 3 would demolish the on-site historic resources, (e.g., recordation of, and interpretative exhibits for, the John Wayne Cancer Institute and CFDC buildings), the level of impact would be similar between the Project and Alternative 3.

Archaeological Resources

Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Section 15064.5?

Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Both Alternative 3 and the Project would include excavations that could potentially encounter archaeological resources and human remains and cause an adverse change in the significance of these resources. This impact would be less than significant after mitigation under both the Project and Alternative 3. However, Alternative 3 would include more development, larger building footprints, and deeper excavations than the Project in a portion of the Project Site (e.g., the southern portion of the South Campus). Therefore, the potential to encounter such resources, and thus the level of the impact, would be greater under this alternative.

Energy

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

Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Under Alternative 3, construction activities at the Project Site would be increased from that of the Project owing to the approximately 22 percent more net new development under this alternative. Therefore, energy consumption for construction activities would be increased from that which would occur under the Project. As with the Project, Alternative 3 would use energy efficient construction equipment as well as implement a construction waste management plan during construction. As such energy impacts during construction would also be less than significant.

Due to the increase in building floor area, Alternative 3 would require more energy use from operation of energy sources (i.e., appliances, lighting) and HVAC equipment than the Project, and would generate incrementally more daily vehicle trips during operation. As with the Project, Alternative 3 would use newer energy efficient appliances, lighting, and equipment as well as comply with water conservation, energy conservation, and other sustainability requirements of the City's Green Building Code and SMMC. Both would increase urban density in a transit-rich area thereby minimizing vehicle trips and reducing regional VMT. Also, neither the Project or Alternative 3 would conflict or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, as with the Project, impacts under Alternative 3 would be less than significant. However, because Alternative 3 would result in greater energy demand (larger facilities and more daily trips) than under the Project, the level of impact would be slightly greater under this alternative.

Geology and Soils

Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death, involving: (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides?

The Project Site is not bisected by an active fault with the potential to cause fault rupture at the surface, and no designated Alquist-Priolo Special Study Fault Zone bisects the Project Site. Therefore, the Project Site is not subject to fault rupture and, the Project and Alternative 3 would not cause potential substantial adverse effects involving fault rupture, and no impact would occur under either project. Impacts would be similar between the Project and Alternative 3.

With regard to strong seismic ground shaking, the Project Site is subject to strong seismic ground shaking which could result in damage to structures and hazards to people under both the Project and Alternative 3. However: (1) the potential level of ground acceleration is common in Southern California; and (2) the associated effects can be mitigated through compliance with the geotechnical engineering design and construction standards specified by the Santa Monica Building Code (SMBC) and the seismic design parameters for the Project specified in the Preliminary and Final Geotechnical Report. Furthermore, both the Project and Alternative 3 would replace older buildings on the Project Site with modern buildings constructed to the latest building code and seismic safety standards, and both the Project and Alternative 3 would be required to adhere to the site-specific

recommendations of a Final Geotechnical Report. Therefore, the Project and Alternative 3 would not cause substantial adverse effects involving strong seismic ground shaking, and impacts would be less than significant, with the level of impact similar between the Project and Alternative 3.

With regard to seismic-related ground failure, including liquefaction, while the liquefaction potential at the Project Site is low, development at the Project Site under both the Project and Alternative 3 would be required to implement the recommendations of a site-specific liquefaction evaluation to be provided in a Final Geotechnical Report. Compliance with the recommendations of the Final Geotechnical Report would sure that the Project would not cause substantial adverse effects involving liquefaction. Thus liquefaction impacts under both the Project and Alternative 3 would be less than significant, with the level of impact similar.

With regard to landslides, the Project site is not located within a designated landslide area or subject to landslides, and while slope instability is possible during excavations, compliance with the recommendations of the Final Geotechnical Reports would ensure that the Project would not cause substantial adverse effects involving landslides. Therefore, impacts under both the Project and Alternative 3 would be less than significant, with the level of impact similar.

Would the project 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; caused in whole or in part by the project's exacerbation of the existing environmental conditions?

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

Both the Project and Alternative 3 could be subject to unstable soil conditions and expansive soils if appropriate design measures are not taken. However, both the Project and Alternative 3 would be required to meet State and City Building Code requirements and comply with the design recommendations of the Preliminary and Final Geotechnical Reports. Regulatory compliance would ensure that impacts related to unstable soil conditions and expansive soils, caused in whole or in part by the Project's exacerbation of the existing environmental conditions, would be less than significant and similar.

Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

There Project Site is fully developed, and there are no unique geologic features at the Project Site, such that neither Alternative 3 nor the Project would destroy unique geologic features. Both Alternative 3 and the Project would include excavations that could potentially encounter paleontological resources and cause an adverse change in the significance of these resources. This impact would be less than significant after mitigation under both the Project and Alternative 3. However, because Alternative 3 would include more development, larger building footprints, and deeper excavations than the Project in a portion of the Project Site (e.g., the southern portion of the

South Campus), the potential to encounter such resources, and thus the level of the impact, would be greater under this alternative.

Greenhouse Gas Emissions

Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG?

Both the Project and Alternative 3 would generate GHG emissions during construction and operation. Under the Project, the net increase in annual GHG emissions during construction and operation would be 10,356 metric tons of CO2e per year, and impacts would be less than significant. Alternative 3 would include more construction and operational activity, vehicle trips, and energy use than the Project, owing to the greater amount of development under this alternative, and as such GHG emissions under this alternative would be greater.

As with the Project, Alternative 3 would be required to comply with water conservation, energy conservation, tree-planting, and other sustainability requirements consistent with the City's Green Building Code and SMMC. Alternative 3 would also implement the same sustainable features as the Project (e.g., PDFs-AQ-1 through PDF-AQ-4). Thus, similar to the Project, Alternative 3 would not conflict with applicable plans, polices or regulations adopted for the purpose of reducing the emissions of GHGs (e.g., the City's LUCE, Sustainable City Plan, Climate Action Plan, AB 32, SB 375, etc.). Impacts would be less than significant under both the Project and Alternative 3, with the level of impact similar between the Project and Alternative 3 as both would be consistent with applicable GHG reduction plans.

Hazards and Hazardous Materials

Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction and operational activities under both the Project and Alternative 3 would include the routine transport, use, storage and disposal of small quantities of hazardous materials. Both the Project and Alternative 3 would also generate small quantities of medical waste during operation similar to the types of medical waste currently generated at the PSJHC campus. However, the transport, use, storage and disposal of hazardous materials during construction and operation would occur in accordance with manufacturer instructions and applicable federal, state and local health and safety regulations (e.g., RCRA and HWCA "cradle to grave" requirements, OSHA workplace and work practices requirements, City HMRRP/HMMP requirements, SMMC requirements, Unified Permit requirements, HASP requirements, etc.) under both the Project and Alternative 3. Such instructions and regulations have been formulated to avoid the exposure of persons and the environment to hazardous materials. Therefore, neither the Project or Alternative 3 would create a significant hazard to the public or the environment through the routine transport, use, storage and disposal of hazardous materials, and impacts would be less than significant. Because the use of hazardous materials would be expected to be less under Alternative 3 than under the Project, owing

to less medical uses and the generation of less medical waste under this alternative, the impact would be less under Alternative 3.

Would the project 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?

Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant of Government Code Section 6592.5, and as a result, it would create a significant hazard to the public or the environment?

Construction and operational activities under both the Project and Alternative 3 would include the use of hazardous materials which could be accidentally released. Furthermore, the Project Site contains two listed hazardous materials sites (open LUST case and former on-site serve stations), and several of the existing on-site buildings contain ACM and LBP. As such, construction activities (e.g., excavation and demolition) under both the Project and Alternative 3 could potentially disturb and release into the environment hazardous materials associated with these sites/buildings. However, through compliance with applicable regulations and manufacturer instructions, and with implementation of the recommended mitigation measures, neither the Project or Alternative 3 would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Impacts would be less than significant under both the Project and Alternative 3. Alternative 3 would include fewer medical uses and generate less medical waste during operation. However, Alternative 3 would provide more development than the Project and, as such, potentially require greater use of hazardous materials during construction. In addition, the larger building footprints and deeper excavations would have the potential to disturb and release hazardous materials during construction. Therefore, impacts with respect to hazardous materials would be greater than under the Projects.

Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction and operational activities under both the Project and Alternative 3 could emit hazardous emissions (e.g., diesel emissions) and handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of McKinley Elementary School. Furthermore, pre-existing hazardous materials conditions (e.g., ASTs, ACMs, LBPs, etc.) exist at the Project Site, and construction activities under both the Project and Alternative 3 could potentially disturb associated hazardous materials and release them into the environment. However, through compliance with applicable regulations and manufacturer instructions and with implementation of the recommended mitigation measures, neither the project or Alternative 3 would expose students at the school to substantial health risks. Impacts would be less than significant under both the Project and Alternative 3. The level of the impacts would be slightly less under Alternative 3 owing to less medical uses and thus the potential for the emission of less hazardous materials during operation.

Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Santa Monica Boulevard, Olympic Boulevard, and the Santa Monica Freeway are City-designated disaster routes. Like the Project, Alternative 3 would include new driveways and street network improvements along Santa Monica Boulevard (MM-TR-1 and MM-TR-2), could include temporary lane closures and/or detours during construction, and would generate construction- and operations-related vehicle trips. However, no streets would be blocked or substantially altered under either project (with the exception of 21st Street, the northern portion of which would be vacated and replaced with a new north-south street between Santa Monica Boulevard and Broadway under the Project). Furthermore, any temporary lane closures or detours during construction would be undertaken under a required Construction Management Plan and would be reviewed and approved by the City. Lastly, the Project Site and surrounding area are served by a fully developed grid street system that offers multiple routes to each destination. Therefore, like the Project, Alternative 3 would not impair implementation or physically interfere with an adopted emergency response or evaluation plan, and the impact would be less than significant. The level of the impact would be similar between the two the Project and Alternative 3, because while Alternative 3 would generate more vehicle trips and potentially more slowing of emergency response, it would not include modification of the existing street system (e.g., would not include the vacation of a portion of 21st Street).

Hydrology and Water Quality

Would the project:

- *Violate any water quality standards or waste discharge requirements, or otherwise degrade surface or ground water quality?*
- *Substantially alter the existing drainage patterns of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would:*

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

  (ii) Create or contribute runoff water which would provide substantial additional sources of polluted runoff?
- *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to inundation?*
- *Conflict with or obstruct implementation of a water quality control plan?*

Like the Project, construction and operation of Alternative 3 could potentially contribute pollutants in stormwater runoff that could drain to impaired receiving waters (e.g., Santa Monica Bay). However, both the Project and Alternative 3 would comply with applicable water quality regulatory requirements (e.g., City's Runoff Conservation and Sustainable Management Ordinance, City LID requirements, etc.) which have been formulated to comply with the TMDLs and avoid both violation of waste discharge requirements and substantial degradation of the water quality of the receiving waters. Compliance with these requirements would ensure that water quality impacts would be less than significant under both the Project and Alternative 3. These requirements include, but are not limited to, retaining stormwater from either the 0.75-inch per 24-hour storm or the 85th

percent storm, whichever is greater, and implementing structural and non-structural water quality BMPs. The level of impact would be slightly greater under Alternative 3 owing to the greater amount of development, impervious surfaces, vehicle trips, and associated stormwater runoff and deposition of pollutants under this alternative.

The LARWQCB maintains the Water Quality Control Plan for the Los Angeles Region (Basin Plan) in accordance with federal and State Law. The Basin Plan establishes beneficial uses for surface and groundwater in the region, and sets forth the regulatory water quality standards to protect those designated beneficial uses. In cases where the Basin Plan does not contain a water quality objective for a particular pollutant, other criteria are used to establish a standard. Other criteria may be applied from SWRCB documents (e.g., the Inland Surface Waters Plan and the Pollutant Policy Document) or from water quality criteria developed under Section 304(a) of the CWA. Permits issued to control pollution (i.e. waste discharge requirements and NPDES permits) must implement Basin Plan requirements (i.e. water quality standards), taking into consideration beneficial uses to be protected.

Construction and operational activities under both Alternative 3 and the Project would comply with all applicable water quality regulations, including but not limited to: (1) NPDES MS4 Permit requirements, implementation of an NPDES Construction General Permit SWPPP and ECSP, and SCAQMD rules, all of which require the implementation of BMPs during construction to control sedimentation, erosion, and pollutant loading of stormwater runoff from construction sites; (2) LARWQCB Construction Dewatering General Permit (NPDES Permit No. CAG994004) requirements for any construction dewatering; and (3) NPDES MS4 Permit requirements, City urban runoff (including stormwater retention) and LID BMP requirements, and City Runoff Mitigation Plan requirements. These requirements have been formulated to comply with the TMDLs for Santa Monica Beach and Santa Monica Bay, and to avoid substantial erosion, sedimentation, and pollutant loading of stormwater runoff from development during construction and operation. Therefore, with compliance with these requirements, Alternative 3 and the Project would comply with the Basin Plan, the impact would be less than significant, and the level of the impact would be similar.

The Project Site is not located in a FEMA designated 100-year floodplain or an area susceptible to flooding by the failure of a levee or dam. Therefore, neither the Project nor Alternative 3 would place housing or other structures within a 100-year floodplain, impede or redirect flood flows, and/or 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. Impacts would be less than significant under, and similar between, the Project and Alternative 3. The Project Site is not subject to potential inundation by seiche, tsunami or mudflow. Therefore, the Project and Alternative 3 would not be subject to these potential hazards, and impacts would be less than significant and similar.

Would the project:

- *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*
- *Conflict with or obstruct implementation of a sustainable groundwater management plan?*

Alternative 3, like the Project, would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that it would impede sustainable groundwater management. This is because both the Project and Alternative 3 would not: (1) have a substantial effect on the ratio of pervious to impervious surfaces at the Project Site; (2) include groundwater withdrawals (other than, potentially, small amounts of groundwater associated with any required dewatering); (3) overlay a designated groundwater recharge area; or (4) result in a substantial net increase in demand for water. Therefore, impacts would be less than significant under both the Project and Alternative 3. The level of impact would be slightly greater under Alternative 3 owing to: (1) the greater amount of development and impervious surfaces that could potentially decrease the small amount of infiltration of rainwater to the groundwater that occurs on the Project Site; and (2) and the potential need for slightly more dewatering associated with the deeper subterranean parking at \ Site S2 under this alternative.

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

(i) Result in substantial erosion, siltation, or flooding on- or off-site:(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

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

(iii) Impede or redirect flood flows?

The Project and Alternative 3 would not substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, as no stream or river bisects the Project Site and as site drainage under both the Project and Alternative 3 would continue to be conveyed to the municipal storm drains in the adjacent streets. Similarly, neither the Project or Alternative would result in substantial erosion or siltation as both the Project and Alternative 3 would comply with applicable regulations (e.g., the City's Runoff Conservation and Sustainable Management Ordinance) which have been formulated to avoid substantial erosion and siltation during construction and operation. Additionally, after buildout, all of the Project Site's ground surface would be covered by either impervious surfaces or landscaping. Impacts would be similar between the Project and Alternative 3.

With regard to impacts on the capacity of existing or planned stormwater drainage infrastructure, peak stormwater runoff from the Project Site would be expected to be decreased slightly under both the Project and Alternative 3. This is because the amount of impervious surfaces would decrease slightly under both the Project and Alternative 3 owing to increased landscaping and open space, and because both would be subject to the City's Urban Runoff Pollution Ordinance. Therefore, neither the Project or Alternative 3 would exceed the capacity of the local stormwater drainage system, and impacts would be less than significant under both the Project and Alternative 3. The level of impact would be slightly greater under Alternative 3 owing to the greater amount of development, impervious surfaces, and associated stormwater runoff under this alternative.

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Land Use and Planning

Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation of an agency adopted for the purpose of avoiding or mitigating an environmental effect?

LUCE

The Project Site is designated by the LUCE as Healthcare District. LUCE goals and policies call for preserving and enhancing existing neighborhoods; encouraging walking, bicycling, and public transit; integrating land use and transportation to reduce per capita vehicle trips and GHG emissions; providing affordable housing; increasing open space and enhancing the pedestrian access; supporting the responsible expansion of the PSJHC; and updating the HASP. Both the Project and Alternative 3 would be consistent with the Healthcare District land use designation and goals/policies of the LUCE, and thus impacts would be less than significant under both the Project and Alternative 3. However, impacts would be greater under Alternative 3. This is because the LUCE designates the Project Site as lying within the Healthcare District, which is a land use designation within the broader Employment and Commerce designation (LUCE, p. 2.1-29). The Healthcare District includes the PSJHC, the Santa Monica-UCLA Medical Center (SM-UCLA), and the area immediately around and between these facilities. The Healthcare District allows for a variety of uses designed to support PSJHC and SM-UCLA, including hospital, medical office, pharmacies, residential care, rehabilitation and outpatient clinics, affordable, workforce and market-rate housing targeted at hospital employees, extended stay lodging for patient families, and supporting retail uses (LUCE p. 2.1-57). The 247 market rate residential units under Alternative 3 would not include affordable/workforce units, would not be specifically targeted at PSJHC employees, and would take the place of the medical uses supporting PSJHC under the Project. Furthermore, because the LUCE defers to the PSJHC DA for development standards applicable to the Project Site, and because the current PSJHC DA does not plan for 247 residential units on the South Campus, the PSJHC DA would need to be amended to permit these residential units. Neither the Project nor Alternative 3 would result in significant impacts as a result of inconsistencies with the LUCE. However, because the Project more closely meets the objectives of the LUCE, land use and planning impacts related to plan consistency would be less than under Alternative 3.

HASP

The HASP establishes two overlays, SJ-N and SJ-S to govern the development of the PSJHC. The HASP defers to the PSJHC 1998 DA and Master Plan with respect to development standards and use regulations for the PSJHC Campus. The Project would be consistent with the HASP with approval of the proposed amendments to the HASP to reflect the Project, Phase II Master Plan, and DA. These amendments would include related maps, background information, development standards, objectives, and implementation program. Alternative 3 would similarly be consistent with the HASP with the proposed amendments. However, as indicated above, the DA doesn't currently plan for 247 residential units on the South Campus such that the extent of the required amendments to the DA would be greater under Alternative 3. Neither the Project nor Alternative 3 would result in significant impacts as a result of inconsistencies with the HASP. However, because the Project more closely meets the objectives of the HASP, land use and planning impacts related to plan consistency would be less than under Alternative 3.

PSJHC Development Agreement

Neither the Project nor Alternative 3 would exceed the development rights vested to PSJHC by the City in the 1998 DA of 799,000 total for Phase II development (with a max. of 744,000 square feet above-grade), except that the Project would require an amendment to the DA to increase the vested floor area for Hospital/Health Care use from 354,000 square feet to 404,000 square feet and Alternative 3 would require an amendment to the DA to permit the proposed 247 residential units on the South Campus. Both the Project and Alternative 3 would also be consistent with the height and setback requirements of the DA, but would require amendments to the DA to extend the Phase II vested rights. The Project would also require amendments of the DA for the proposed pedestrian bridge over Santa Monica Boulevard and expansion of the Mullin Entry Plaza, including the addition of the Mullen Plaza Café, amendments not required under Alternative 3. With the proposed amendments to the DA, both the Project and Alternative 3 would be consistent with the DA and the impact would be less than significant. The level of the impacts would be greater under Alternative 3 because the 247 residential units under this alternative would represent a fundamental change in the land uses previously planned for and approved on the South Campus under the DA. Neither the Project nor Alternative 3 would result in significant impacts as a result of inconsistencies with the provision of the PSJHC DA. However, because the Project more closely meets the provisions of the PSJHC DA, land use and planning impacts related to plan consistency would be similar under Alternative 3.

Zoning

All of the Phase II Development Sites are zoned HMU, except that a small portion of Site S5 is zoned MUBL. Both the Project and Alternative 3 would include land uses that are consistent with the zoning of the Project Site such that the impact would be less than significant under both the Project and Alternative 3. This is because: (1) both would include the use types permitted in these zones and generally the setbacks required; (2) both would provide the community benefits required to qualify for Tier 2 building heights; and (3) the PSJHC DA overrides the zoning during the term of the DA (e.g., until 2053). Neither the Project nor Alternative 3 would result in significant impacts as a result of inconsistencies with zoning. However, because the Project would provide more public benefit through greater open space than under Alternative 3, it would more closely meet the community benefit objectives of the HMU zone. Land use and planning impacts related to zoning would be less under the Project than under Alternative 3.

SCAG RTP/SCS

As indicated in Section 4.11, *Land Use and Planning*, the Project would be consistent with RTP/SCS goals (see Table 4.11-5), with key points supporting this conclusion as:

- The Project would provide for the expansion of its health care and related facilities within the Healthcare District, near two Expo Light Rail stations, near bus lines along Santa Monica Boulevard and 20th Street, and would implement a TDM program to reduce single-occupancy vehicle trips.
- The Project would provide new bicycle connections to the dedicated bicycle lane on Broadway, bicycle parking, pedestrian pathways, and widened sidewalks on Santa Monica Boulevard and Broadway to encourage active transportation.

- The Project would incorporate sustainability features to improve air quality, such as optimizing passive strategies to reduce energy use (e.g., building orientation, operable windows, and shading); solar photovoltaic panels; solar water heating; green roofs; low-flow fixtures; energy efficient heating, ventilation, HVAC and lighting; electrical vehicle charging stations; and a TDM program to reduce single-occupancy vehicle trips.

Because the above key points would also apply to Alternative 3, Alternative 3 would also be consistent with the RTP/SCS and impacts under this alternative would also be less than significant. The level of impacts under Alternative 3 would be similar to the Project because both would further the above RTP/SCS goals, and because while this alternative would not include the same level of pedestrian pathways as the Project or the same level of expansion of health care facilities within the Healthcare District, it would provide for greater mix of uses in proximity to mass transit. Because both the Project and Alternative 3 would encourage pedestrian activity and locate higher urban density in proximity to transit, neither the Project nor Alternative 3 would result in significant impacts as a result of inconsistencies with the RTP/SCS, Therefore, land use and planning impacts related to plan consistency would be less than significant and similar.

Neighborhood Effects

Would the project have considerable effects on the neighborhoods in which they are located?

Both Alternative 3 and the Project would result in a net increase in development at the Project Site, and associated construction and operational activities, that would generate neighborhood effects within the Mid-City neighborhood. The Project would result in less than significant neighborhood effects in terms of aesthetics, land use, noise, air quality, and operational intersection and street segment LOS. Alternative 3 would result in similar impacts, owing to the 699,595 square feet of net new development under this alternative, although the level of these impacts would be greater than under the Project owing to approximately 22 percent greater development under this alternative. Although impacts at one intersection would be significant and unavoidable under both the Project and Alternative 3, the Project's neighborhood effects would be incrementally greater than under Alternative 3.

Noise and Vibration

Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction

Both the Project and Alternative 3 would require the use of heavy motorized construction equipment (graders, excavators, etc.) and stationary construction equipment (generators, electric hand tools, etc.) for on-site construction activities (e.g., demolition, grading, excavation, foundation/concrete pouring, building construction, etc.). This, along with construction vehicle trips (haul trucks, construction worker vehicle trips, etc.) on area streets would generate varying levels of temporary noise during the approximately 22-year construction period.

As evaluated in Section 4.13, *Noise and Vibration*, of this EIR, Project construction activities would not exceed SMMC noise restrictions at existing adjacent noise-sensitive receptors before 10 a.m. or after 3 p.m. While Project construction activities would temporarily or periodically increase ambient noise levels at some of the surrounding sensitive receptors, impacts would be less than significant due in part to noise attention between the noise source and receptors, City limits on the times of day when construction activities can occur; and PDF NOISE-1 requiring properly operating mufflers on construction equipment, locating construction staging areas as fall as possible from noise-sensitive uses, and installing temporary noise barriers. Therefore, Project construction equipment and activity noise impacts would be less than significant.

Alternative 3 would include approximately 22 percent more development than the Project, and thus would include a longer construction duration. However, the maximum day construction activities and associated noise during these maximum construction days would be similar between the Project and Alternative 3. Hence, worse-case daily impacts would be similar and less than significant under Alternative 3 as well. However, the level of impact is considered slightly greater under this alternative due to the greater extent and duration of construction activities.

With regards to construction vehicular noise, as indicated in Section 4.13, Project construction vehicular noise would not increase existing roadway noise levels by 5 dBA CNEL or greater and the impact would be less than significant. Alternative 3 would include approximately 22 percent more development than the Project, and thus would include more total construction days than the Project. However, the maximum day construction vehicle trips and associated noise during these maximum construction days would be similar between the Project and Alternative 3. Hence, impacts would be less than significant under Alternative 3 as well. However, the level of impact is considered slightly greater under this alternative due to the greater extent and duration of construction activities.

Operation

Both the Project and Alternative 3 would include net increases in on-site mechanical equipment (e.g., HVAC systems, emergency generators, etc.), parking structure and loading dock use, and outdoor open space activity. As indicated in Section 4.13 of this EIR for the Project, all mechanical equipment would be designed with noise control devices or enclosures that limit exterior noise levels to 60 dBA during the day and 50 dBA at night[6], parking structure and loading dock use would not increase ambient noise levels by more than 5 dBA, and outdoor open space activity would not increase noise levels at 50 ft by more than 5 dBA Leq, such that operational noise impacts from these sources would be less than significant.

Alternative 3 would include approximately 22 percent more development than the Project. Thus, Alternative 3 would be expected to include more on-site mechanical equipment, parking structure area and loading dock use than the Project and generate more noise from these uses. However, Alternative 3 would be subject to the same noise regulations as the Project that would preclude significant operational mechanical equipment noise impacts, parking structures and loading docks would be mostly or fully enclosed, and as indicated above, open space noise would be expected to

6 PDF-NOISE-7 requires an acoustical analysis of the proposed mechanical plans to ensure that all mechanical equipment is designed to meet City noise limits.

be less than under the Project. Hence, impacts would less than significant under Alternative 3 as well, with the level of impact slightly greater under this alternative owing to more operational noise under this alternative.

With regard to operational traffic noise, as indicated in Section 4.13, Project operational vehicles would not increase noise levels on nearby roadways by more than 5 dBA CNEL. Alternative 3 would include approximately 22 percent more development and generate approximately 12 percent more daily vehicle trips (11,236 trips) than the Project (9,826 trips). To determine whether this increase in vehicle trips would exceed the 5 dBA CNEL noise threshold, the EIR: (1) identified the street segment along which the Project would generate the greatest increase in traffic noise (e.g., 3.7 dBA CNEL at 21st Street between Santa Monica Boulevard and Broadway); (2) estimated the net increase in vehicle trips along this street under Alternative 3 (e.g., 490 daily trips); and (3) calculated the associated traffic noise level at the nearest sensitive use (e.g., much less than the two apartment buildings along the east side of this street segment). The analysis indicates that Alternative 3 would result in less than a 1 dBA CNEL increase to the 3.7 dBA CNEL increase in traffic noise at the apartments that would occur under the Project. Therefore, similar to the Project, Alternative 3 would result in less than significant operational traffic noise impacts at sensitive receptors, with the level of impact slightly greater under this alternative.

Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Construction

As indicated in Section 4.13, Project construction would include the use of heavy construction equipment at the Project Site that could generate groundborne vibration levels that exceed both the FTA structural damage threshold of 0.3 in/sec PPV at the nearest existing buildings and the FTA sensitive use threshold for surgical uses of 0.008 in/sec PVV.[7] Mitigation Measure MM-NOISE-2 would prevent vibration impacts to vibration sensitive medical equipment at Medical Office Buildings not owned/controlled by Saint John's that participate in Mitigation Measure NOISE-2 through location inventory, simulation testing, equipment relocation, equipment isolation, not conducting construction during active use of equipment, or alternative construction methods. Thus, potentially significant construction vibration impacts at participating Medical Office Buildings not owned/controlled by Saint John's would be reduced to a less than significant level. However, for any Medical Office Buildings not owned/controlled by Saint John's that do not participate in Mitigation Measure NOISE-2, Project construction vibration could result impacts to vibration sensitive medical equipment

Because the use of heavy construction equipment would also occur during construction of Alternative 3, groundborne vibration levels under Alternative 3 could also potentially exceed the above thresholds. For any Medical Office Buildings not owned/controlled by Saint John's that do not participate in Mitigation Measure NOISE-2, construction vibration under Alternative 3 could also result in significant impacts to vibration sensitive medical equipment. Therefore, the impact would be significant and unavoidable under both Alternative 3 and the Project. The level of the

[7] Per the SMMC, construction activities are exempt from human annoyance thresholds for groundborne vibration.

impacts would be slightly greater under Alternative 3 owing to more development and thus more construction activities and associated groundborne vibration under this alternative.

Operation

Operation of both the Project and Alternative 3 would include the use of mechanical equipment and would generate vehicle trips, both of which would generate small amounts of groundborne vibration. However, as indicated in Section 4.13 of this EIR, Project operation would not cause groundborne vibration that exceeds applicable thresholds (e.g., the FTA's structural damage and surgical use thresholds discussed previously, as well as the human annoyance threshold of 72 VdB). Because Alternative 3 would include similar uses and only approximately 12 percent more daily vehicle trips than the Project, operations-related ground-borne vibration would also be less than significant. The level of impact would be slightly greater under Alternative 3 owing to slightly more development and operational vehicle trips under this alternative.

Population and Housing

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

Like the Project, Alternative 3 would represent infill development within an area already fully served by roads and other infrastructure, and thus would not extend roads or infrastructure or indirectly induce substantial population growth.

Also like the Project, Alternative 3 would result in a net increase in medical and associated uses at the Project Site that would create new jobs, with this increase less under this alternative owing to less new medical use development. Still, because the increase in employment under the Project would be consistent with the employment growth projected in the City's LUCE and SCAG's 2016-2040 RCP/SCS, so too would the lesser employment growth under Alternative 3. Therefore, Alternative 3, like the Project, would not directly induce substantial population growth related to employees. However, whereas both the Project and Alternative 3 would replace the 10 existing vacant multi-family housing units on the Project Site with 10 new multi-family housing units, Alternative 3 would include 247 new housing units not planned for the site in the LUCE, HASP, and 1998 DA, and therefore is not likely included in the LUCE and RCP/SCS growth projections. Still, the increase in residential population under this alternative would represent a very small proportion of the total existing resident population of the City and thus would not represent a "substantial" increase in population. Therefore, as with the Project, Alternative 3 would not directly induce substantial population growth and the impact would be less than significant, with the level of this impact slightly greater than under the Project.

Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Both the Project and Alternative 3 would replace the 10 existing multi-family residential units at Site S4 with 10 new multi-family housing units. Therefore, like the Project Alternative 3 would not

displace substantial number of existing housing or people, and would result in less than significant impacts, with the level of impact similar.

Police Protection

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

Similar to the Project, construction and operational activities under Alternative 3 would create a demand for police protection services and could potentially slow emergency response times and interfere with emergency access. However, as with the Project: (1) the increase in demand would be small, and would be off-set through site security features (construction fencing, controlled access, 24-hour security guards/patrols, etc.) and compliance with City security and lighting requirements; and (2) adequate emergency access would be maintained through implementation of the required Construction Management Plan and City (including SMPD) review/approval of the proposed site plan. Furthermore, consistent with the *City of Hayward v. Trustees of California State University* (Court of Appeal of the State of California, 2015), significant impacts under CEQA consist of adverse changes in any of the physical conditions caused by a project, and potential impacts on emergency response times are not an environmental impact that CEQA requires a project to mitigate. Therefore, Alternative 3, like the Project, would not require new or expanded police protection facilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant. Because Alternative 3 would include more development and a greater demand for police protection services than the Project, the level of impacts would be greater under this alternative.

Fire Protection

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

Similar to the Project, construction and operational activities under Alternative 3 would create a demand for fire protection services and fire flow, and could potentially slow emergency response times and interfere with emergency access. However, as with the Project: (1) the increase in demand for service would be off-set through fire prevention features (including automatic sprinkler systems in all buildings) and regulatory compliance; (2) adequate emergency access would be maintained through implementation of the required Construction Management Plan and City (including SMFD) review/approval of the proposed site plan; and (3) adequate fire flow would be assured through the provision of required fire hydrants, payment of the City's Water Capital Facility Fee, and provision of improvements to off-site water lines if required. Furthermore, consistent with the *City of Hayward v. Trustees of California State University* (Court of Appeal of the State of

California, 2015), significant impacts under CEQA consist of adverse changes in any of the physical conditions caused by a project, and potential impacts on emergency response times are not an environmental impact that CEQA requires a project to mitigate. Therefore, Alternative 3, like the Project, would not require new or expanded fire protection facilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant. Because Alternative 3 would include more development and thus generate a greater increase in demand for fire protection services than the Project, the level of impacts would be greater under this alternative.

Transportation

Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?

Both Alternative 3 and the Project would develop a mix of hospital/healthcare-related, medical office, medical research, commercial, and residential uses on the PSJHC Campus consistent with the LUCE, SMMC, and Hospital Area Specific Plan. However, Alternative 3 would include substantially more residential development, and less medical development, than planned for under the 1998 PSJHC DA and subsequent amendments. The primary goals of the LUCE and SCAG's 2016 RTP/SCS with regard to alternative transportation in Santa Monica are focused on shifting trips away from single-occupancy vehicles to more sustainable modes of travel such as transit, bicycling, and walking. To achieve this goal, the LUCE encourages the development of mixed-use communities with attractive and safe bicycle and pedestrian facilities that are also well connected to high-capacity and frequent transit service. Both Alternative 3 and the Project would support the LUCE policies that encourage alternative transportation in that both would: (1) represent a mixed-use development on an infill site in proximity to transit (including two Metro rail stations and multiple bus lines); (2) include pedestrian improvements along Santa Monica Boulevard and Broadway (such as widened sidewalks), improvements to the on-site pedestrian network, and new bicycle parking and connections to the dedicated bike lanes Broadway; and (3) implement a TDM program (PDF-TRAF-2) to encourage the use of alternative transportation and reduce single occupancy vehicle trips and VMT as much as possible. Hence, both the Project and Alternative 3 would result in less than significant impacts in terms of consistency with circulation plans/programs/policies. The level of the impacts would be less under Alternative 3 owing to the placement of increased density of uses in proximity to transit and thus greater expected alternative transportation use under this alternative.

Would the Project conflict or be inconsistent with CEQA Guidelines Section 15464.3, subdivision (b)?

Vehicle Miles Travelled

CEQA Guidelines Section 15064.3(b) applies to an alternative approach to the evaluation of transportation impacts, such as the evaluation of per capita vehicles miles traveled (VMT) in lieu of the evaluation of peak hour vehicle trips. The City has not yet adopted a VMT methodology to address this updated CEQA Guidelines Appendix G Checklist Question. As such, the following VMT analysis is provided for informational purposes (no significance determination provided) only. The VMT under the Project would be an estimated 12.8 miles daily for employees and 8.3

daily for non-workers (e.g., patients and visitors), versus the City average of 19.3 miles. Like the Project, it is anticipated that VMT per capita under Alternative 3 would be less than the City average owing to the intensification of density in proximity to transit and implementation of the proposed TDM Program (PDF-TRAF-2). Therefore, both the Project and Alternative 3 would reduce VMT per capita, air emissions, regional GHG emissions, and gasoline demand. The level of impact would be slightly less under Alternative 3 because this alternative would result in greater intensification of density, and thus likely slightly less VMT, than the Project.

Intersection Operations

As indicated in Table 5-2, Alternative 3 operation would generate an estimated net increase of 717 AM peak hour trips, 844 PM peak hour trips, and 11,236 daily weekday trips at buildout (2042), versus the Project which would generate an estimated net increase of 641 AM peak hour trips, 754 PM peak hour trips, and 9,826 daily trips at buildout. Hence, Alternative 3 would generate approximately 12 percent more operational vehicle trips than the Project.

As indicated in Tables 5-5 and 5-6, all of the Project's significant intersection impacts in the Approval Year[8] (2019) and Future Year (2042) under both the HCM and CMA methodologies would also occur under Alternative 3. In all, 14 intersections would be significantly impacted under both the Project and Alternative 3 before mitigation. With implementation of the mitigation measures identified in Section 4.17, 11 intersections (e.g., Intersections 26, 33, 42, 44, 50, 53, 74, 79, 80, 82 and 83) would be significantly and unavoidably impacted in the Future Year (2042) condition under both the Project and Alternative 3 (both assuming approval of the mitigation measures by the applicable regulatory agencies). The level of impact would be greater under Alternative 3 owing to greater vehicle trips generation, and thus greater impacts at these intersections, under this alternative.

Street Segment Operations

Both the Project and Alternative 3 would generate an increase in operational vehicle trips that would exceed applicable base ADT standards along some of the 17 study street segments in the Project Site vicinity. Alternative 3 would result in significant operational base ADT impacts along the same six street segments as the Project. As with the Project, no feasible mitigation is available to mitigate these impacts. Therefore, both the Project and Alternative 2 would result in significant unavoidable street segment operations impacts. The level of impact would be greater under Alternative 3 owing to a greater number of street segments significantly impacted under this alternative.

CMP Traffic Analysis

Vehicle trips generated by the Project would not result in exceedance of Metro's CMP screening threshold (e.g., 150 trips during the AM or PM peak hour) at the mainline freeway monitoring locations analyzed. While Alternative 3 would result in greater trip generation than the Project, it too would not result in exceedance of Metro's CMP screening thresholds at the mainline freeway monitoring locations analyzed. However, both the Project and Alternative 3 would exceed Metro's

[8] The Approval Year (2019) condition (e.g., existing + Project condition) is evaluated for information purposes only as required by CEQA.

screening threshold (e.g., 50 trips during the AM or PM peak hour) at three arterial intersections including Intersections 47 (Cloverfield Blvd/Santa Monica Blvd.), 60 (2th St./Wilshire Blvd.), and 77 (Bundy Dr./Santa Monica Blvd.). Still, neither the Project or Alternative 3 would result in exceedance of the CMP guideline's significance thresholds at these intersections (e.g., an increase in vehicle trips of 2% of capacity, causing LOS F, or, if the facility is already at LOS F, an increase in vehicle trips of 2% of capacity). Therefore, impacts would be less than significant under both the Project and Alternative 3, with the level of impacts slightly greater under Alternative 3 owing to more trip generation under this alternative.

CMP Transit Analysis

The transit person trips expected to be generated by the Project would represent less than 1 percent of the capacity of the bus lines and Metro rail lines serving the study area and the Project Site. While Alternative 3 would result in slightly greater demand for transit than the Project, owing to more development, it too would result in less than 1 percent of the capacity of the bus and rail lines serving the study area of the Project Site. This level of ridership increase would represent a less than significant impact on the regional transit system under both the Project and Alternative 3, with the level of impact slightly greater under Alternative 3 owing to slightly greater transit demand under this alternative.

Similar to the Project, Alternative 3 would represent a mixed-use development and the intensification of urban density on an infill site in proximity to transit, would include pedestrian and bicycle improvements, and would implement a TDM program (PDF-TRAF-1), to encourage the use of alternative transportation and reduce single occupancy vehicle trips as much as possible. As indicated previously, both the Project and Alternative 3 would also reduce VMT. Therefore, similar to the Project, Alternative would be consistent with adopted City plans, policies, and programs supporting alternative transportation (e.g., LUCE, SMMC, Santa Monica Bike Action Plan, SB 743, SCAG's 2016 RTP/SCS, etc.), and the impact would be less than significant. The level of impacts would be similar under Alternative 3 to those of the Project (this alternative would include greater VMT-reducing density in proximity to transit, a beneficial impact, but would also include less pedestrian improvements).

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

As indicated in Section 4.17, *Transportation*, the Project would not include any hazardous design feature such as sharp curves or dangerous intersections either on- or off-site (e.g., all proposed intersections would be at right-angles and signal or stop controlled, and the City would review all proposed street improvements for safety and compliance with City Code requirements). Furthermore, the Project would include the development of medical and residential uses rather than the types of uses (e.g., industrial, landfill, agriculture, etc.) that could potentially generate substantial truck or farm equipment that is hazardous or incompatible. Therefore, the Project would result in less than significant impacts with regard to hazards due to design features. For these same reasons, Alternative 3 would result in less than significant impacts, with the level of impacts generally similar to those of the Project (while Alternative 3 would result in greater operational

vehicle trips, it would also not include the closure of a portion of 21st Street or the construction of the new street and associated intersections that would occur under the Project).

Would the Project result in inadequate emergency access?

As discussed in Sections 4.9, *Hazards and Hazardous Materials*, 4.15, *Police Protection*, and 4.16, *Fire Protection*, emergency access to the Project Site is currently available directly from several large arterials, including Arizona Avenue, Santa Monica Boulevard, Broadway, and 20th Street. Also: (1) the Project does not propose the closure or the major modification of these streets; and (2) the proposed site plan and associated street improvements would be reviewed and approved by multiple City Departments to ensure compliance with City code requirements and the provision of adequate emergency access. Furthermore, the Project proposes medical uses and would be located immediately adjacent to Saint John's Hospital such that immediate emergency medical service would always be available. Lastly, a Construction Management Plan (PDF-TRAF-1) would be implemented to, in part, ensure the continued provision of emergency access during the construction period. Therefore, the Project would not result in inadequate emergency access, and the impact would be less than significant. For these same reasons, Alternative 3 would result in less than significant impacts, with the level of impacts being similar between the Project and Alternative 3.

Tribal Cultural Resources

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

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k); or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

No tribal cultural resources, as defined in PRC Section 21074, were identified as located on the Project Site during the tribal consultations required by AB 32. Therefore, the Project and Alternative 3 would not cause a substantial adverse change in the significance of tribal cultural resources, and no impact would occur under either the Project or Alternative 3.

Water Supply

Would the project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects?

As with the Project, domestic water and fire flow water required for Alternative 3 would be sourced from the same public water mains. Under both the Project and Alternative 3: (1) new water laterals would be installed connecting the proposed buildings to the existing 8-inch water lines in 20th

Street and the existing 12-inch water line in 21st Street, Santa Monica Boulevard, and Broadway; and (2) all buildings would be developed with fire suppression sprinklers which, per the SSMC, would reduce fire flow requirements. However Alternative 3 would avoid the need to relocate the existing water line in the northern portion of 21st Street.

As indicated in Section 4.18, Water Supply, flow test results conducted for the Project indicate that: (1) adequate capacity exists in the existing water lines to provide the required domestic water needs of the Project; and (2) while four additional fire hydrants would be required, implementation of Mitigation Measure MM-WS-1 requiring provision of these hydrants would provide the required fire flow. Alternative 3 would generate a greater demand for domestic water and fire flow than the Project, owing to the greater amount of development under this alternative (including more residential units that generate greater water demand per square foot than medical uses). Still, it is anticipated that adequate infrastructure capacity would be available to meet the greater demand under Alternative 3 with implementation of MM-WS-1. This is because, as indicated in the analysis for the Project, substantial excess domestic water capacity exists, and the City would require additional fire hydrants, if required, during site plan review.

The environmental effects of relocation/construction of the on-site water infrastructure for both the Project and Alternative 3 is subsumed in the impact analyses for the other environmental topics evaluated in this EIR (e.g., air quality, noise, etc.). Also, the environmental effects of the construction of the required off-site water infrastructure improvements (e.g., fire hydrants) would be minimal owing to their limited area of disturbance, their location within the existing streets rights-of-way, and compliance with the Construction Traffic Management Program. Therefore, neither the Project or Alternative 3 would require or result in the construction of new water facilities or the expansion of existing facilities, the construction of which would cause significant environmental effects. The impacts of both the Project and Alternative 3 would be less than significant, with the level of impacts similar.

Would the project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Alternative 3 would result in a net increase in development at the Project Site of 699,595 square feet of floor area (exclusive of structured parking), as compared to 571,945 square feet under the Project. This net increase in development would generate an increase in water demand from the City under both the Project and Alternative 3. **Table 5-10**, *Alternative 3 – Estimated Water Demand*, provides an estimate of the increase in water demand under Alternative 3. As indicated, Alternative 3 would generate an average increase in water demand of an estimated 278,271 GPD or 312 AFY (compared to 195,293 GPD or 215 AFY under the Project).

TABLE 5-10
ALTERNATIVE 3 – ESTIMATED WATER DEMAND

Site	Uses	Floor Area/ Units per Use	Wastewater Generation Factor[a]	Water-Wastewater Ratio[a]	Average Water Demand	
					GPD	AFY
2I	Child and Family Development Center	25,500 sf	120 gal/ksf	1.5	4,590	5.1
	Daycare	9,000-15,000 sf	120 gal/ksf	1.5	2,700	3.0
	Medical Office	15,500 sf	250 gal/ksf	1.5	5,813	6.5
	Health-Related Services, Restaurant, or Neighborhood Commercial	4,500 sf	250 gal/ksf	1.5	1,688	1.9
	Up to four levels of subterranean parking	137,828 sf	20 gal/ksf	1.5	4,136	4.63
2C	Hospital/Health Care, Medical Research, and/or Health & Wellness Center	112,000 sf	250 gal/ksf	1.5	42,000	47.0
	Health-Related Services , Restaurant, or Neighborhood Commercial	5,500 sf	250 gal/ksf	1.5	2,063	2.3
	Up to four levels of subterranean parking	118,729 sf	20 gal/ksf	1.5	3,548	3.97
2D/E	Hospital/Health Care Medical Research and/or Health & Wellness Center	75,500 sf	250 gal/ksf	1.5	28,313	31.7
	Health-Related Services Restaurant or Neighborhood Commercial Uses	3,000 sf	250 gal/ksf	1.5	1,125	1.3
	Up to four levels of subterranean parking	115,729 sf	20 gal/ksf	1.5	3,472	3.89
South Campus w. of 21st Street South (S1)	Multi-Family Housing	82,150 sf (101 du)	150 gal/du	1.5	22,725	25.5
	Restaurant or Neighborhood Commercial	4,350 sf	250 gal/ksf	1.5	1,629	1.8
	Up to five levels of subterranean parking	303,973 sf (includes S3)	20 gal/ksf	1.5	9,119	10.21
South Campus w. of 21st Street North (S3)	Hospital/Health Care, Medical Research, and/or Health & Wellness Center	118,000 sf	250 gal/ksf	1.5	44,250	49.6
	Health-Related Services, Restaurant, or Neighborhood Commercial	5,000 sf	250 gal/ksf	1.5	1,875	2.1
	Up to five levels of subterranean parking	(Included in S1, above)	20 gal/ksf	1.5	-	-
South Campus e. of 21st Street North (S4)	Hospital/Health Care, Medical Research, or Health & Wellness	180,350 sf	250 gal/ksf	1.5	67,632	75.8
	Health-Related Services, Restaurant, or Neighborhood Commercial	8,200 sf	250 gal/ksf	1.5	3,075	3.4
	Restaurant	1,800 sf	250 gal/ksf	1.5	675	0.8
	Auditorium	8,650 sf (250 seats)	3 gal/seat	1.5	1,125	1.3
	Up to five levels of subterranean parking	486,416 sf (includes S2 and S5)	20 gal/ksf	1.5	14,592	16.35
South Campus e. of 21st Street South (S5/S2)	Multi-Family Housing	110,850 sf (136 du)	150 gal/du	1.5	30,600	34.3
	Restaurant or Neighborhood Commercial	8,400 sf	250 gal/ksf	1.5	3,150	3.6
	Up to five levels of subterranean parking	(Included in S4, above)	20 gal/ksf	1.5	-	-
South Campus e. of 21st Street MUBL Site	Multi-Family Housing	8,250 sf (10 du)	150 gal/du	1.5	2,250	2.5
	Restaurant or Neighborhood Commercial	4,350 sf	250 gal/ksf	1.5	1,632	1.8
	Up to two levels of subterranean parking	7,200	20 gal/ksf	1.5	216	0.24
				TOTAL (GROSS)	**303,993**	**340.59**
				EXISTING	**25,722**	**29**
				TOTAL (NET)	**278,271**	**311.59**

Acronyms/Abbreviations: sf = square feet; ksf = 1,000 sf; gal = gallon; gpd = gallons per day; du = dwelling unit

[a] Todd Groundwater, Water Supply Assessment for Providence Saint John's Health Center Phase II Project, July 2018.

SOURCE: ESA, April 2019.

The City's 2015 UWMP analyzes the reliability of the City's water resources to meet water demand for normal, single-dry and multiple-dry year scenarios though 2040. The City's 2040 water supply during these scenarios is projected to be 155 percent, 142 percent, and 150 percent of demand, respectively (7,223 AF, 6,031 AF, and 6,659 AF, respectively). Therefore, the UWMP projects that the City would have adequate water supply to meet its demand, and in fact would have substantially more supply than demand, through at least the 2040 planning horizon of the UWMP. Because the estimated increase in water demand under the Project and Alternative 3 would each represent very small proportions of these surpluses, the City's water supplies would be adequate to meet water demand during normal, dry and multiple dry years under both the Project and Alternative 3. No new or expanded water entitlements would be required, and impacts would be less than significant under both the Project and Alternative 3. As water demand would be greater under Alternative 3, the level of impacts under this alternative would be greater than under the Project.

The above analysis is conservative because: (1) it assumes that Project water demand is not accounted for in the UWMP's water demand projections, when in fact this demand is most likely included as the projections are based on zoning and both the Project and Alternative 3 would be consistent with zoning; (2) it does not account for reductions in Project water demand associated with the implementation of required water conservation features; and (3) the 2015 UWMP was completed prior to the adoption of the City's Water Neutrality Ordinance such that the City's future water demand would likely be less than that projected in the 2015 UWMP.

Wastewater

Would the Project require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects?

Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Alternative 3 would result in a net increase in development at the Project Site of 699,595 square feet of floor area (exclusive of structured parking), as compared to 571,945 square feet under the Project. This increase in development would generate an increase in wastewater generation requiring conveyance and treatment under both the Project and Alternative 3. **Table 5-11**, *Alternative 3 – Estimated Wastewater Generation*, provides an estimate of wastewater generation under Alternative 3. As indicated, Alternative 3 would generate a net increase in wastewater of an estimated 176,938 GPD (compared to up to 154,158 GPD under the Project).

TABLE 5-11
ALTERNATIVE 3 – ESTIMATED WASTEWATER GENERATION

Site	Uses	Floor Area/ Units per Use	Wastewater Generation Factor[a]	Wastewater Generation (GPD)
2I	Child and Family Development Center	25,500 sf	120 gal/ksf	3,060
	Daycare	9,000-15,000 sf	120 gal/ksf	1,800
	Medical Office	15,500 sf	250 gal/ksf	3,875
	Health-Related Services, Restaurant, or Neighborhood Commercial	4,500 sf	250 gal/ksf	1,125
	Up to four levels of subterranean parking	137,828 sf	20 gal/ksf	2,757
2C	Hospital/Health Care, Medical Research, and/or Health & Wellness Center	112,000 sf	250 gal/ksf	28,000
	Health-Related Services , Restaurant, or Neighborhood Commercial	5,500 sf	250 gal/ksf	1,375
	Up to four levels of subterranean parking	118,265 sf	20 gal/ksf	2,365
2D/E	Hospital/Health Care Medical Research and/or Health & Wellness Center	75,500 sf	250 gal/ksf	18,875
	Health-Related Services Restaurant or Neighborhood Commercial Uses	3,000 sf	250 gal/ksf	750
	Up to four levels of subterranean parking	115,729 sf	20 gal/ksf	2,315
South Campus w. of 21st Street South (S1)	Multi-Family Housing	82,150 sf (101 du)	150 gal/du	15,150
	Restaurant or Neighborhood Commercial	4,350 sf	250 gal/ksf	1,086
	Up to five levels of subterranean parking	303,973 sf (includes S3)	20 gal/ksf	6,079
South Campus w. of 21st Street North (S3)	Hospital/Health Care, Medical Research, and/or Health & Wellness Center	118,000 sf	250 gal/ksf	29,500
	Health-Related Services, Restaurant, or Neighborhood Commercial	5,000 sf	250 gal/ksf	1,250
	Up to five levels of subterranean parking	(Included in S1)	20 gal/ksf	-
South Campus e. of 21st Street North (S4)	Hospital/Health Care, Medical Research, or Health & Wellness	180,350 sf	250 gal/ksf	45,088
	Health-Related Services, Restaurant, or Neighborhood Commercial	8,200 sf	250 gal/ksf	2,050
	Restaurant	1,800 sf	250 gal/ksf	450
	Auditorium	8,650 sf (250 seats)	3 gal/seat	750
	Up to five levels of subterranean parking	486,416 sf (includes S5 & S2)	20 gal/ksf	9,728
South Campus e. of 21st Street South (S5/S2)	Multi-Family Housing	110,850 sf (136 du)	150 gal/du	20,400
	Restaurant or Neighborhood Commercial	8,400 sf	250 gal/ksf	2,100
	Up to five levels of subterranean parking	(Included in S4, above)	20 gal/ksf	-
South Campus e. of 21st Street MUBL Site	Multi-Family Housing	8,250 sf (10 du)	150 gal/du	1,500
	Restaurant or Neighborhood Commercial	4,350 sf	250 gal/ksf	1,088
	Up to two levels of subterranean parking	7,200	20 gal/ksf	144
			TOTAL (GROSS)	**202,660**
			EXISTING	**25,722**
			TOTAL (NET)	**176,938**

Acronyms/Abbreviations: sf = square feet; ksf = 1,000 sf; gal = gallon; gpd = gallons per day; du = dwelling unit

[a] Todd Groundwater, Water Supply Assessment for Providence Saint John's Health Center Phase II Project, July 2018.

SOURCE: ESA, April 2019.

The Project Site is currently served by three existing 12-inch sewer lines, one each in Santa Monica Boulevard, 20th Street, and Broadway. Each of these lines serves a different portion of the Project Site. As indicated in Section 4.19, *Wastewater*, wastewater flows under the Project would not exceed the City's flow threshold (e.g., 50 percent of full capacity) in the 20th Street line, but would exceed this threshold in both the Broadway and Santa Monica Boulevard lines. Adequate wastewater conveyance capacity would be available under the Project and Alternative 3 with: (1) the proposed upsizing of a portion of the Broadway line; and (2) implementation of Mitigation Measure MM-WW-1 with regards to the Santa Monica line.

Similar to the Project, Alternative 3 would construct hospital/health care, medical research, medical office, neighborhood commercial, restaurant, day care, and residential uses that would result in a net increase in wastewater flows requiring treatment by the HTP. Wastewater discharges under both the Project and Alternative 3 would be typical of the wastewater already generated at the Phase II Development Sites, except that under Alternative 3 more residential-related wastewater and less medical-related wastewater would be generated than under the Project. For both project, the wastewater would not include large quantities of any unusual industrial/hazardous discharges (such as may sometimes be associated with large industrial facilities, oil refineries, etc.) that can sometimes interfere with the ability of a treatment plant meeting the water quality requirements for its discharges. Furthermore, LARWQCB, in connection with the implementation of the NPDES program, has imposed requirements on the treatment of wastewater, and the wastewater produced by Alternative 3 and the Project would meet these requirements through treatment at the HTP which includes full secondary treatment that reduces wastewater solids by at least 95 percent. Given the above, and because the discharges from the HTP would be required to meet LARWQCB wastewater treatment requirements, Alternative 3, like the Project, would not exceed wastewater treatment requirements of the applicable RWQCB. Therefore, the impact would be less than significant under both the Project and Alternative 3, with the level of impact slightly greater under Alternative 3 owing to more development and more wastewater generation.

Solid Waste

Would the Project generate solid waste in excess of State or local standards or in excess of the capacity of the local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

As indicated in Section 4.20, *Solid Waste*, with compliance with the 75 percent diversion required by existing regulations, the Project would generate an estimated 302,027 tons of construction solid waste and 0.93 tons per day of operational solid waste. The construction solid waste would require disposal at the County's only operating inert landfill (Azusa Land Reclamation) or at any of a number of IDEFOs in the County such as the Arcadia Reclamation Facility, while the operational solid waste would require disposal at one or more of the 12 Class III landfills currently serving the City. Because this solid waste would represent only approximately 0.54 percent and 0.002 percent, respectively, of the remaining construction and operational solid waste disposal capacity at these facilities, sufficient permitted solid waste disposal capacity is available to serve the Project and impacts would be less than significant. Alternative 3 would include approximately 18.2 percent more floor area than the Project, and would therefore be expected to generate roughly a similar

percentage more of construction and operational solid waste than the Project. However, given the extremely small percentage of the remaining available construction (inert) and operational (Class III) landfill capacity that would be taken up by the Project, it can be reasonably assumed that adequate landfill capacity would also be available to serve Alternative 3. Therefore, the impacts would be less than significant under both Projects, with the level of the impacts slightly greater under Alternative 3.

Both the Project and Alternative 3 would be implemented in compliance with applicable federal, state, and local statutes and regulations related to solid waste. In accordance with SMMC Section 8.108.010, the Applicant would submit a WMP for C&D waste meeting City requirements as part of the application packet for demolition permits and construction will achieve at least a 70 percent solid waste diversion rate. With regard to waste generated during operation, the Project and Alternative 3 would provide refuse and recycling bins to accommodate the solid waste streams generated by the proposed uses, and would house these bins in enclosed refuse areas in compliance with SMMC Section 9.21.130 (Resource Recovery and Recycling Standards). In accordance with Assembly Bill 1826, separate recycling bins for organic waste would be provided, and arrangements would be made for organic waste recycling services. Therefore, the impacts of the Project and Alternative 3 would be less than significant, with the level of the impacts generally similar.

Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

5.6.3.3 Relationship of the Alternative to the Project Objectives

Alternative 3 proposes generally similar healthcare and related uses to the Project on the North Campus and the northern portion of the South Campus, and primarily multi-family housing (247 units) developed to Tier 2 densities and heights in the southern portion of the South Campus. This would result in less healthcare uses than under the Project, but greater overall net new development (699,595 square feet vs. 571,945 under the Project). This alternative would also result in less on-site open space than the Project, would maintain the existing street system, would not include the pedestrian bridge over Santa Monica Boulevard, and would not require the relocation of utility infrastructure.

Alternative 3 would mostly meet all of the Project objectives. It would mostly meet Objective 1 – Health Care and Related Uses and Facilities, by ensuring that PSJHC functions as part of an integrated health services delivery system that provides a range of care for Santa Monica and surrounding communities by providing state-of-the-art acute care, outpatient (ambulatory) treatment, health and medical research, illness and disease prevent, community health education, and patient and facility support services and facilities. It would meet Objective 2 – Required Uses and Facilities, but ensuring that PSJHC provides child care and replacement housing in accordance with the DA. It would mostly meet Objective 3 – Phase II Master Plan Development Program, by developing a comprehensive Master Plan for Phase II of the PSJHC Campus and a Development Program that are designed to achieve the other Project objectives, accommodate the uses vested by the DA, integrate the campus, and ensure that acute care, outpatient treatment and related services

are situated near each other, and ensure that PSJHC remains in continuous operation as a hospital and health care facility during development. It would mostly meet Objective 4 – Mobility and Circulation, by developing and implementing a comprehensive circulation plan for vehicles, bicycles and pedestrians, and providing connections between buildings via these modes of travel. It would mostly meet Objectives 5 – Parking, and 6 – Minimizing VMT, by providing sufficient parking to meet PSJHC peak parking demand, implementing a TDM program, and providing a complimentary mix of land uses. It would meet Objective 7 – Minimize Phase II Impacts, by ensuring that the Phase II Phasing Plan and schedule minimize impacts on PSJHC neighbors and existing uses to the extent reasonably feasible.

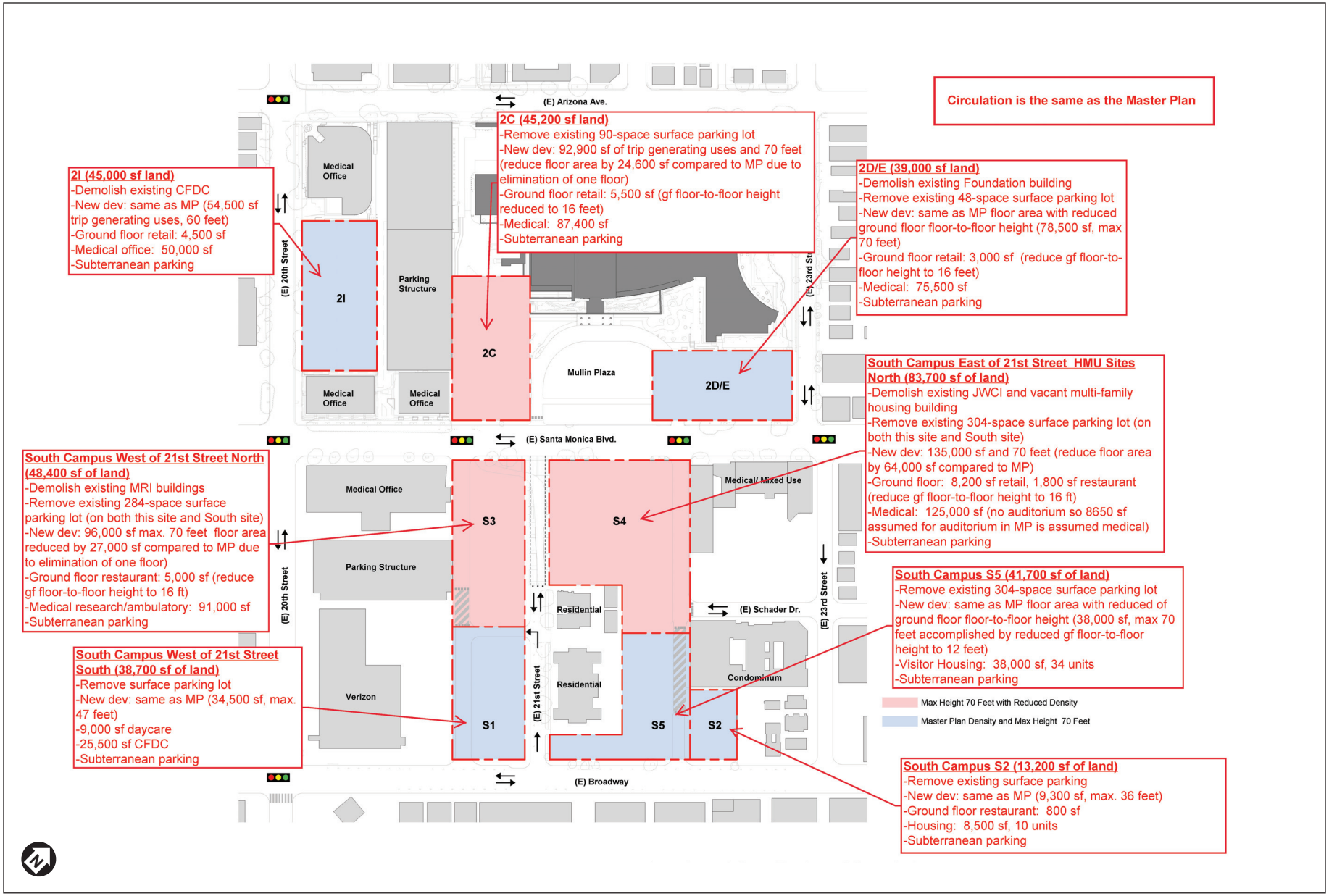
However, Alternative 3 would not be as effective in meeting some of the objectives because it would not: (1) provide the range and/or extent of medical services to be provided under the Project due to its reduced amount of healthcare uses (Objective 1); (2) accommodate all the Phase II healthcare development vested by the DA or provide 35 percent of the Project Site as open space (Objective 3); or (3) provide the same level of pedestrian and bicycle-friendly features as the Project. Given the increased amount of development and greater building heights under Alternative 3, and associated aesthetics, air quality, noise and intersection traffic impacts, this alternative would also be less effective than the Project in minimizing impacts on PSJHC neighbors (Objective 7). On the other hand, Alternative 3 would likely reduce VMT per capita to a greater extent than the Project given the development of high-density residential and employment-generating uses on the same site, both in close proximity to transit (Objective 5).

Overall, Alternative 3 would be less effective than the Project in meeting the Project objectives.

5.6.4 Alternative 4 – Reduced Master Plan

5.6.4.1 Description of the Alternative

Alternative 4 represents a reduction in the Phase II Master Plan, with a reduction in height such that all new buildings would be no greater than 70 feet consistent with the Zoning Ordinance's HMU Tier 2 maximum height. Under Alternative 4, total development on the Saint John's Campus would be reduced due to the decreased height as compared to the Master Plan, with the assumption that building footprints and open space would be provided similar to the Project. In addition, Alternative 4 assumes the same proposed street network as the Master Plan, including new streets such as 20th Place and Saint John's Way and, the northern portion of 21st Street would be vacated. Furthermore, the tunnel connections and above-grade pedestrian connections over Santa Monica Boulevard would be constructed. Similar to the Project, this alternative would require relocation of existing utilities. The development at the Project Site under this alternative is specified further in **Figure 5-3** and **Table 5-12**, and is discussed further below. As indicated therein, this alternative would include 557,500 square feet of new floor area (including 44 du), or a net increase of 447,445 square feet (including 44 du).



SOURCE: Perkins Eastman, October 2018

Providence Saint John's Health Center Phase II Project

Figure 5-3
Alternative 4 – Reduced Master Plan

ESA

TABLE 5-12
ALTERNATIVE 4 (REDUCED MASTER PLAN) - DEVELOPMENT SUMMARY

Development Site	Uses	Floor Area/ Units per Use	Max. Building Floor Area	Max. Height
2I	Medical Office	50,000 sf	73,300 sf of total building floor area	60 feet
	Health-Related Services , Restaurant, or Neighborhood Commercial Uses	4,500 sf		
	Up to four levels of subterranean parking			
2C	Hospital/Health Care, Medical Research, or Health & Wellness Center	87,400 sf	92,900 sf	70 feet
	Health-Related Services, Restaurant, or Neighborhood Commercial Uses	5,500 sf		
	Up to four levels of subterranean parking			
2D/E	Hospital/Health Care, Medical Research, or Health & Wellness Center	75,500 sf	78,500 sf	70 feet
	Health-Related Services, Restaurant, or Neighborhood Commercial Uses	3,000 sf		
	Up to four levels of subterranean parking			
S1	Daycare	9,000 sf	34,500 sf	47 feet
	Child and Family Development Center/	25,500 sf		
	Up to five levels of subterranean parking			
S3	Hospital/Health Care, Medical Research, or Health & Wellness Center	91,000 sf	96,000 sf	70 feet
	Health-Related Services, Restaurant, or Neighborhood Commercial	5,000 sf		
	Up to five levels of subterranean parking			
S4	Hospital/Health Care, Medical Research or Health & Wellness	125,000 sf	135,000 sf	70 feet
	Health-Related Services and/or Neighborhood Commercial	8,200 sf		
	Restaurant	1,800 sf		
	Up to five levels of subterranean parking			
S5	Visitor Housing	38,000 sf (34 units)	38,000 sf	70 feet
	Up to five levels of subterranean parking			
S2	Multi-Family (Replacement) Housing	8,500 sf (10 units)	9,300 sf	36 feet
	Restaurant or Neighborhood Commercial	800 sf		
	Up to two levels of subterranean parking			
		TOTAL (GROSS)	**557,500 sf (includes 44 du)**	
		TOTAL (NET)	**447,445 sf (includes 44 du)**	

Source: PSJHC, 2018

Site 2I: 20th Street Medical Building

Alternative 4 would demolish the existing Child & Family Development Center at Site 2I, which is approximately 34,670 square feet, and develop a new medical office building on the approximately 45,000 square feet 2I site. As with the Project, the 2I building would be a maximum of 54,500 square feet of trip generating uses with 73,300 square feet of total building floor area. For the purposes of a worst case analysis and consistent with the Master Plan, this alternative assumes 4,500 square feet of ground floor Health-Related Services, Restaurant, or Neighborhood Commercial Uses, 50,000 square feet of Medical Office, and 18,800 square feet for parking/vehicle circulation within the building's ground level (same as the Project). The maximum height would be 60 feet (same as Project). Similar to the Project, there would be up to four levels of subterranean parking. Site access to Site 2I would be the same as the Project.

Site 2C: West Ambulatory & Acute Care Building

Similar to the Project, Alternative 4 would remove the existing surface parking lot (West Lot) and landscaping in the North Campus and construct a Revised Alternative 4 West Ambulatory & Acute Care Building with subterranean parking on the approximately 45,200-square-foot 2C site. Development of the Revised Alternative 4 West Ambulatory & Acute Care Building (2C) would be less than the Project due to the height limit of 70 feet (compared with the Project's 95-foot height limit for Site 2C), with a maximum of 92,900 square feet (compared with the Project's maximum of 117,500 square feet) containing a mix of Hospital/Health Care Health & Wellness Center and/or Medical Research uses and ground floor Health-Related Services, Restaurant or Neighborhood Commercial uses. It is assumed that 2C would include a maximum of 87,400 square feet of Hospital/Health Care or Medical Research uses (compared with the Project's maximum of 112,000 square feet Hospital/Health Care or Medical Research uses) and 5,500 square feet of ground-level Health-Related Services, Restaurant or Neighborhood Commercial Uses. There would be up to four levels of subterranean parking beneath the Revised Alternative 4 West Ambulatory & Acute Care Building (2C). Site access to Site 2C would be the same as the Project.

Sites 2D/E: East Ambulatory & Acute Care Building

Similar to the Project, the development program for Site 2D/E, Alternative 4 includes the demolition of the single-story office building located at 2221 Santa Monica Boulevard (currently used by the Saint John's Health Center Foundation) and the existing surface parking lots, followed by the construction of a Revised Alternative 4 East Ambulatory & Acute Care Building and associated subterranean parking on the approximately 39,000 square feet 2D/E site.

As with the Project, the Revised Alternative 4 East Ambulatory & Acute Care Building (2D/E) would have a maximum of 78,500 square feet containing a mix of Hospital/Health Care, Health & Wellness Center and/or Medical Research uses and ground floor Health-Related Services, Restaurant or Neighborhood Commercial Uses. For the purposes of a worst case analysis and consistent with the Master Plan, it is assumed that 2C would include a maximum of 75,500 square feet of Hospital/Health Care or Medical Research uses and 3,000 square feet of ground-level Health-Related Services, Restaurant or Neighborhood Commercial uses for a total of 78,500 square feet. The maximum building height would be limited to 70 feet (compared with the Project's 75-

foot height limit for Site 2D/E). There would be up to four levels of subterranean parking beneath the East Ambulatory & Acute Care Building (2D/E). Similar to the proposed Master Plan, Mullin Plaza would be expanded onto Site 2D/E and reconfigured. However, the 1,500 square feet Mullin Plaza Café would not be developed under this alternative. Site access to Site 2D/E would be the same as the Project.

Site S1

Alternative 4 would remove the existing surface parking lot and develop approximately 38,700 square feet of property located at the S1 site with the same development program as the Master Plan. Specifically, this area would be developed with a maximum 34,500 square feet of uses consisting of 9,000-15,000 square feet Daycare use with remaining dedicated to the Child and Family Development Center use. For conservative analysis (similar to the Project), this site is studied conservatively assuming 9,000 square feet Daycare and 25,500 square feet Child and Family Development Center /use. The maximum height would be 47 feet (same as the Project). Similar to the Project, a subterranean parking garage with up to five levels of underground parking would be provided. Site access to Site S1 would be the same as the Project.

Site S3

The northern portion of the South Campus west of 21st Street includes the existing temporary MRI Building and existing surface parking lot comprising approximately 48,400 square feet in area. Alternative 4 would demolish these uses and replace them with 91,000 square feet of Hospital/Health Care, Health & Wellness Center and/or Medical Research space and 5,000 square feet of ground floor Health-Related Services, Restaurant, or Neighborhood Commercial Uses. As compared to the Project, this area would have a reduction in height and reduction in Hospital/Health Care or Medical Research uses. The maximum height would be 70 feet compared with the Project's height limit of 89 feet for Site S3. The maximum floor area would be 96,000 square feet compared with the Project's maximum floor area of 123,000 square feet for Site S3. Similar to the Project, a subterranean parking garage with up to five levels of underground parking would be provided. Site access to Site S3 would be the same as the Project.

Site S4

Alternative 4 would develop approximately 83,700 square feet of property within the South Campus, generally encompassing the northern portion of the South Campus east of 21st Street (including the existing 10-unit vacant multifamily housing site at 1427-1433 21st Street, which would be demolished). The existing John Wayne Cancer Institute building and surface parking would also be demolished. With the height limit of 70 feet (compared with the Project's height limit of 105 feet for Site S4), Alternative 4 would develop a total of 135,000 square feet (compared with the Project's maximum floor area of 199,000 square feet for Site S4), consisting of 8,200 square feet of ground floor retail (Health-Related Services or Neighborhood Commercial Uses), 1,800 square feet of Restaurant, and 125,000 square feet of Hospital/Health Care, Medical Research, or Health & Wellness Center uses. As compared to the Master Plan, there would be no conference center/auditorium due to the maximum height limit of 70 feet.

In comparison to the Project, Alternative 4 would have the same amount of ground floor Health-Related Services, Restaurant, or Neighborhood Commercial with the remaining square footage dedicated to healthcare uses (a reduction of 64,000 square feet of healthcare uses compared with the Project). Similar to the Project, a subterranean parking garage with up to five levels of underground parking would be provided. Site access to Site S4 would be the same as the Project.

Site S5, including the MUBL Site

Alternative 4 would develop approximately 41,700 square feet on Site S5 within the South Campus, east of 21st Street. Similar to the Project, Alternative 4 would replace the existing surface parking with a total of 38,000 square feet, consisting of 34 units of Visitor Housing uses. The maximum height would be limited to 70 feet (compared with the Project's 73-foot height limit for Site S5). Similar to the Project, a subterranean parking garage with up to five levels of underground parking would be provided. Site access to Site S5 would be the same as the Project.

Site S2

Alternative 4 would develop approximately 13,200 square feet on Site S2 property within the South Campus, east of 21st Street. Similar to the Project, Alternative 4 would replace the existing surface parking with a total of 9,300 square feet, consisting of 10 units of replacement multi-family apartments (Multi-Family Housing) and 800 square feet of ground floor Restaurant or Neighborhood Commercial Uses. Similar to the Project, a subterranean parking garage with up to two levels would be provided. Site access to Site S2 would be the same as the Project.

5.6.4.2 Environmental Impacts

Aesthetics

The following aesthetics analysis regarding views, scenic resources, light and glare, and shading is provided for informational purposes only, since impacts are less than significant for employment projects within urban areas, pursuant to PRC Section 21099(d)(1). See Section 4.1, Aesthetics, of this EIR for further discussion PRC Sections 21099(d)(1) and (d)(2)(A).

Would the project have a substantial adverse effect on a scenic vista?

As stated in Section 4.1, due to distance and intervening topography, views of the Pacific Ocean are limited from east to west corridors along Santa Monica Boulevard, Broadway, and Arizona Avenue near the Project Site. Limited views of the Santa Monica Mountains to the north are available from north and south corridors such as 23rd Street and 20th Street adjacent to the Project Site. There are no protected views or view corridors within the Project area and no scenic vistas across the Project Site.

Alternative 4 would include less development and lower building heights than the Project, such that development under Alternative 4 would be result in less changes in existing views from public vantage points. However, as with the Project, no scenic vistas of the Santa Monica Mountains to the north or the Pacific Ocean to the west currently exist across the Project Site. Both the Project or Alternative 4 would include a pedestrian bridge over Santa Monica Boulevard, but there are no public parks, scenic overlooks, scenic highways, or other public gathering places in the immediate

vicinity of the Project Site that have views of the mountains and Pacific Ocean. Therefore, neither the Project or Alternative 4 would have substantial adverse effects on scenic vistas, with the impact being similar to the Project due to the absence of nearby scenic vistas.

Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway or a locally-designated scenic corridor?

The Project Site is not located on or near a State scenic highway or locally-designated scenic corridor. Furthermore, while there are several off-site historic resources within the viewshed of the Project Site, neither the Project or Alternative 4 would impact these resources or materially impact the setting in which these resources occur. Both the Project or Alternative 4 would remove two buildings eligible as local historic resources (e.g., John Wayne Cancer Institute and the Child & Family Development Center) which are considered excellent examples of Mid Century Modern architecture. However, the loss of these resources from an aesthetic perspective would be off-set to some degree under both the Project or Alternative 4 by new construction exhibiting high quality architecture, landscape design, and increased open space, and in accordance with PRC Section 21099(d)(1), this impact is not identified as significant under either the Project or Alternative 4. Based on the above, the impacts of Alternative 4 would be similar to those of the Project.

Would the project conflict with applicable zoning and other regulations governing scenic quality?

As indicated in Section 4.1, *Aesthetics*, the Project would alter the visual character of the Project Site in that, while the Project Site is already urbanized, the Project would intensify development at the site. However, as discussed in Section 4.1, the Project would be consistent with applicable zoning and other regulations that govern scenic quality in that the scale and architecture.

As with the Project, Alternative 4 would be subject to architectural design review by the Architectural Review Board (ARB), in accordance with SMMC Section 9.55 (architectural review). Consistent with ARB review, findings will be made demonstrating that new development shall be compatible with the surrounding area

Alternative 4 would include less development, lower building heights, and less open space than the Project. Alternative 4 would not include the Mullin Plaza café with outdoor dining. It would not include Saint John's Square or the 900 Saint John's Café with outdoor dining, Sun Garden open space adjacent to the 1440 E. 23rd Street condominiums, or the South Garden and other open space adjacent to the 1423 21st Street apartments and Geneva Plaza senior housing building. Because Alternative 4 would not provide the Project's same level of pedestrian improvements or landscaped open space, which soften visual effects and buffer adjacent disparate uses in accordance with LUCE and the HASP, impacts related to aesthetics would be greater under Alternative 4 than under the Project.

Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Both the Project and Alternative 4 would create new sources of light and glare. However, while there are several light-sensitive uses in the immediate vicinity, the Project Site and surrounding area is already a lit urban environment. Furthermore, all proposed new exterior light sources would be shielded, and all proposed lighting and exterior building facades would be required to comply with SMMC requirements and undergo City design review by the ARB. Therefore, neither the Project or Alternative 4 would create new sources of substantial light or glare that could adversely affect day or nighttime views in the area. Impacts would be less under Alternative 4 owing to less development, and thus less lighting and a lower potential for glare generation under this alternative.

Would the project create shading effects that would interfere with the use of outdoor open space or solar accessibility?

As indicated in Section 4.1, the Project would not shade any existing shadow-sensitive uses in the vicinity (e.g., Berkley East Convalescent Hospital, small apartment buildings and single-family residences along Arizona Avenue and 21st Street, McKinley Elementary School, etc.) for more than 3 hours during the winter or for more than 4 hours during the remaining seasons. Thus, the Project would not create shading effects that could interfere with the use of outdoor open space or solar accessibility. As development under Alternative 4 would occur at the same locations (e.g., Development Sites) as under the Project and include the same footprints, but would include lower building heights (max. of 70 ft. tall versus 105 ft. tall under the Project), associated shading would similarly not interfere with the use of outdoor open space or solar accessibility. Therefore, shading impacts would be less than significant under both the Project or Alternative 4, with impacts less under Alternative 4 owing to lower building heights and slightly less shading of off-site shadow-sensitive uses.

Air Quality

Would the project conflict with or obstruct implementation of the applicable air quality plan?

Like the Project, construction and operation of Alternative 4 would generate emissions that would contribute to basin-wide air pollutant emissions, including construction NO_x and PM10 and operational NOx emissions that exceed SCAQMD thresholds before mitigation, and operational NO_x emissions that exceed SCAQMD thresholds after mitigation. Like the Project, Alternative 4 would: (1) comply with SCAQMD Rule 403 requirements during construction; (2) represent "sustainable growth in proximity to transit consistent with SCAG RTP/SCS goals and SB 375 to reduce regional VMT; and (3) be consistent with LUCE and SCAG RTP/SCS growth projections. Like the Project, Alternative 4 would not obstruct implementation of the AQMP, and impacts would be less than significant.

Would the project 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?

Regional Construction Emissions

Under Alternative 4, construction activities at the Project Site would be reduced slightly from those that would occur under the Project owing to the reduced amount of new development under this alternative (although the amount of subterranean development and thus excavations and soil export and associated construction haul trips would be similar between the Project and Alternative 4). Because the Project's regional construction emissions would be less than the SCAQMD's significance thresholds for most criteria pollutants and ozone, precursors, so too would regional construction emissions under Alternative 4. Still, like the Project, it is conservatively assumed that construction activities under Alternative 4 would exceed applicable SCAQMD regional maximum daily emissions thresholds for NOx, even with compliance with SCAQMD Rule 403 (Control of Fugitive Dust), given the substantial exceedance of the NO_x threshold under the Project (167 lbs/day vs. the threshold of 100 lbs/day). However, impacts would be less than significant after mitigation (MM-AIR-1) under both the Project or Alternative 4, with impacts less under Alternative 4.

Regional Operational Emissions

Operational emissions were assessed for area, energy, mobile, and stationary sources under the Project in Section 4.2, *Air Quality*, with emissions from mobile sources (vehicle trips) making up the largest component of the operational emissions. Under Alternative 4, the net increase in development at the Project Site would be 447,445 square feet versus 571,945 square feet under the Project, a reduction of approximately 40 percent. This would translate into a reduction in the number of weekday net vehicle trips to/from the Project Site of from 9,826 to 8,359 trips, with an associated reduction in regional operational emissions. Because of the reduced floor area under Alternative 4, area, energy and stationary source emissions would also be less. Similar to the Project, Alternative 4 would be required to meet regulatory energy efficiency requirements and would reduce regional VMT and associated mobile source emissions given its infill nature and proximity to mass transit facilities. Still, like the Project, it is conservatively assumed that regional operational emissions associated with Alternative 4 would exceed SCAQMD significance thresholds for NO_x given the substantial exceedance of the NOx threshold under the Project (e.g., 96 lbs/day vs. the threshold of 55 lbs/day). Impacts would significant unavoidable under both the Project or Alternative 4, with impacts less under Alternative 4.

Would the project expose sensitive receptors to substantial pollutant concentrations?

Localized Emissions

Section 4.2, *Air Quality* addresses the Project's impacts from construction and operational air pollutant emissions on nearby sensitive receptors. It also evaluates health risks due to toxic air contaminants (TACs) such as diesel emissions (DPM) from haul and delivery trucks. The analysis concludes that the potential increase in NO_x, PM10 and TACs during construction of the Project would exceed applicable SCAQMD significance thresholds at the nearest sensitive receptor locations before mitigation, with these construction impacts less than significant after mitigation (MM-AIR-1). As described previously, construction and operational vehicle trips and activities would be less under Alternative 4 than under the Project. Still, worse-case daily construction NO_x, PM10 and TAC levels at the nearest sensitive receptor locations would be less than significant after

mitigation, like the Project. While maximum daily construction impacts would be similar to the Project, because the overall construction duration would be slightly less under this alternative than the Project, construction impacts of Alternative 4 are considered less than the Project.

Carbon Monoxide Hotspots

Like the Project, Alternative 4 would generate operational vehicle trips that would incrementally increase CO levels at intersections and roadways within one-quarter mile of sensitive receptors. However, as indicated in Section 4.2, *Air Quality*, the Project would not cause or contribute to an exceedance of the CAAQS one-hour or eight-hour CO standards of 20 or 9.0 parts per million, respectively. Because Alternative 4 would result in less operational vehicle trips than the Project as indicated above, Alternative 4 would similarly not exceed the CAAQS standards. Therefore, impacts would be less than significant under both the Project or Alternative 4, with impacts less under Alternative 4 due to the proportionate decrease in vehicle trips.

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

Like the Project, Alternative 4 would include hospital/healthcare-related, medical office, medical research, commercial, and residential land uses that would not be expected to introduce substantial sources of odors, refuse and recycling bins would be covered and properly maintained within enclosed areas to prevent adverse odors, and proper housekeeping practices would be implemented to promote odor control. Therefore, like the Project, construction and operation of Alternative 4 would not create objectionable odors affecting a substantial number of people, and impacts would be less than significant. Given the similarities in land uses between the Project and Alternative 4, the impacts of Alternative 4 would be similar to the Project.

Construction Effects

Would construction of the project result in considerable construction-period impacts due to the scope, or location of construction activities?

Similar to the Project, Alternative 4 would include construction activities that would generate temporary aesthetics effects and air emissions, noise/vibration, and vehicle trips. Alternative 4 would include approximately 78 percent of the net new development as the Project, and thus would most likely generate approximately 22 percent less total construction activities and associated aesthetics effects, air emissions, noise/vibration, and vehicle trips than the Project. However, the maximum amount of construction-related air emissions, noise/vibration and vehicle trips on a peak construction day would be expected to be similar between the Project and Alternative 4. In any event, similar to the Project, the construction-related aesthetics, air quality, and traffic impacts of Alternative 4 would be less than significant with mitigation, while construction noise impacts to sensitive medical uses would remain significant and unavoidable. Overall, the level of impacts would be less under this alternative owing to less total construction activities.

Historical Resources

Would the project cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5?

As analyzed in Section 4.4 *Cultural Resources – Historical Resources*, the John Wayne Cancer Institute and CFDC appear eligible for federal, state, and local listing, and as such meet the definition of historical resources as outlined in CEQA Guidelines Section 15064.5(a). Additionally, there are four off-site historical resources that have views of the Project Site (Santa Monica Doctors Office at 2125 Arizona Avenue, a corner commercial building at 2301 Santa Monica Boulevard, Kingsley Gates Mortuary at 1925 Arizona Avenue, and McKinley Grammar School at 2401 Santa Monica Boulevard). These four resources are eligible for local listing, and as such meet the definition of historical resources as outlined in CEQA Guidelines Section 15064.5(a).

Like the Project, Alternative 4 would: (1) demolish the John Wayne Cancer Institute and CFDC buildings which would represent a significant unavoidable impact even with mitigation (e.g., recordation of, and interpretative exhibits for, the John Wayne Cancer Institute and CFDC buildings) and (2) result in less than significant vibration impacts to the New Medical Arts Annex (a potentially historic building) after mitigation. Because both the Project and Alternative 4 would demolish on-site historic resources, the level of impact would be similar.

Archaeological Resources

Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Section 15064.5?

Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Under Alternative 4, while the amount and height of new development would be reduced from that under the Project, the footprints and excavation depths of the proposed new buildings and subterranean structures would be the same. Therefore, as with the Project, excavations under Alternative 4 could potentially encounter archaeological resources and human remains and cause an adverse change in the significance of these resources. This impact would be less than significant after mitigation under both the Project and Alternative 4, with the level of impact similar between both.

Energy

Would the project result in a potentially significant environmental impact due wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Under Alternative 4, construction activities at the Project Site would be reduced from that of the Project owing to the approximately 22 percent less net new development under this alternative. Therefore, energy consumption for construction activities would be reduced. As with the Project,

Alternative 4 would use energy efficient construction equipment as well as implement a construction waste management plan during construction. As such energy impacts during construction would also be less than significant.

For the same reason, Alternative 4 would require less energy use from HVAC equipment than the Project, and would generate fewer daily vehicle trips during operation. Furthermore, both the Project and Alternative 4 would use energy efficient procedures and newer equipment as well as implement a construction waste management plan during construction, both would improve energy efficiency beyond regulatory requirements during operation, both would comply with water conservation, energy conservation, and other sustainability requirements of the City's Green Building Code and SMMC, and both would increase urban density in a transit-rich area thereby minimizing vehicle trips and reducing regional VMT. Lastly, neither the Project or Alternative 4 would conflict or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, as with the Project, impacts under Alternative 4 would be less than significant, with the level of impact less under this alternative.

Geology and Soils

Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death, involving: (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides?

The Project Site is not bisected by an active fault with the potential to cause fault rupture at the surface, and no designated Alquist-Priolo Special Study Fault Zone bisects the Project Site, such that the Project Site is not subject to fault rupture. Therefore, the Project and Alternative 4 would not expose people or structure to potential substantial adverse effects caused in whole or in part by the project's exacerbation of existing environmental conditions involving fault rupture, and no impact would occur under either. Impacts would be similar between the Project and Alternative 4.

With regard to strong seismic ground shaking, the Project Site is subject to strong seismic ground shaking which could result in damage to structures and hazards to people under both the Project and Alternative 4. However: (1) the potential level of ground acceleration is common in Southern California; and (2) the associated effects can be mitigated through compliance with the geotechnical engineering design and construction standards specified by the SMBC and the seismic design parameters for the Project specified in the Preliminary and Final Geotechnical Report. Furthermore, both the Project and Alternative 4 would replace older buildings on the Project Site with modern buildings constructed to the latest building code and seismic safety standards, and both the Project and Alternative 4 would be required to provide adhere to the site-specific recommendations of a Final Geotechnical Report. Therefore, the Project and Alternative 4 would not expose people or structure to potential substantial adverse effects caused in whole or in part by the project's exacerbation of existing environmental conditions involving strong seismic ground shaking, and impacts would be less than significant, with the level of impact similar.

With regard to seismic-related ground failure, including liquefaction, while the liquefaction potential at the Project Site is low, development at the Project Site under both the Project and Alternative 4 would be required to implement the recommendations of a site-specific liquefaction evaluation, compliance with which would not expose people or structure to potential substantial adverse effects caused in whole or in part by the project's exacerbation of existing environmental conditions involving liquefaction. Thus liquefaction impacts under both the Project and Alternative 4 would be less than significant, with the level of impact similar.

With regard to landslides, the Project site is not located within a designated landslide area or subject to landslides, and while slope instability is possible during excavations, compliance with the recommendations of the Preliminary and Final Geotechnical Reports would not expose people or structures to potential substantial adverse effects caused in whole or in part by the project's exacerbation of existing environmental conditions involving landslides, Therefore, impacts under both the Project and Alternative 4 would be less than significant, with the level of impact similar.

Would the project 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; caused in whole or in part by the project's exacerbation of the existing environmental conditions?

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

Both the Project and Alternative 4 could be subject to unstable soil conditions and expansive soils if appropriate design measures are not taken. However, both the Project and Alternative 4 would be required to meet State and City Building Code requirements and comply with the design recommendations of the Preliminary and Final Geotechnical Reports. Regulatory compliance would ensure that impacts related to unstable soil conditions and expansive soils, caused in whole or in part by the Project's exacerbation of the existing environmental conditions, would be less than significant and similar between the Project and Alternative 4.

Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Under Alternative 4, while the amount and height of new development would be reduced from that under the Project, the footprints and depths of the proposed new buildings and subterranean structures would be the same. Therefore, as with the Project, excavations under Alternative 4 could potentially encounter paleontological resources and cause an adverse change in the significance of these resources. This impact would be less than significant after mitigation under both the Project and Alternative 4, with the level of impact similar.

Greenhouse Gas Emissions

Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG?

Both the Project and Alternative 4 would generate GHG emissions during construction and operation. Under the Project, the net increase in annual GHG emissions during construction and operation would be 10,356 metric tons of CO2e per year, and impacts would be less than significant with implementation of PDF-1 through PDF-AQ-4. Because Alternative 4 would include less construction and operational activity, vehicle trips, and energy use than the Project, owing to the reduced amount of development under this alternative, and would implement the same PDFs, GHG emissions under this alternative would similarly not exceed the GHG screening level and would be less than significant. Because Alternative 4 would generate less GHG emissions than the Project, owing to less development, impacts would be less under this alternative.

As with the Project, Alternative 4 would be required to comply with water conservation, energy conservation, tree-planting, and other sustainability requirements consistent with the City's Green Building Code and SMMC. Thus, similar to the Project, Alternative 4 would not conflict with applicable plans, polices or regulations adopted for the purpose of reducing the emissions of GHGs (e.g., the City's LUCE, Sustainable City Plan, Climate Action Plan, AB 32, SB 375, etc.) with implementation of the proposed PDFs. Impacts would be less than significant under both the Project and Alternative 4, with the level of impact similar between the Project and Alternative 4 as both would be consistent with applicable GHG reduction plans.

Hazards and Hazardous Materials

Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction and operational activities under both the Project and Alternative 4 would include the routine transport, use, storage and disposal of small quantities of hazardous materials. Both the Project and Alternative 4 would also generate small quantities of medical waste during operation similar to the types of medical waste currently generated at the PSJHC campus. However, the transport, use, storage and disposal of hazardous materials during construction and operation would occur in accordance with manufacturer instructions and applicable federal, state and local health and safety regulations (e.g., RCRA and HWCA "cradle to grave" requirements, OSHA workplace and work practices requirements, City HMRRP/HMMP requirements, SMMC requirements, Unified Permit requirements, HASP requirements, etc.) under both the Project and Alternative 4. Such instructions and regulations have been formulated to avoid the exposure of persons and the environment to hazardous materials. Therefore, neither the Project or Alternative 4 would create a significant hazard to the public or the environment through the routine transport, use, storage and disposal of hazardous materials, and impacts would be less than significant. Because the use of

hazardous materials would be expected to be less under Alternative 4, owing to less construction and operational activities, the impact would be less under this alternative.

Would the project 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?

Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant of Government Code Section 6592.5, and as a result, it would create a significant hazard to the public or the environment?

Construction and operational activities under both the Project and Alternative 4 would include the use of hazardous materials which could be accidentally released. Furthermore, the Project Site contains two listed hazardous materials sites (open LUST case and former on-site serve stations), and several of the existing on-site buildings contain ACM and LBP. As such, construction activities (e.g., excavation and demolition) under both the Project and Alternative 4 could potentially disturb and release into the environment hazardous materials associated with these sites/buildings. However, through compliance with applicable regulations and manufacturer instructions, and with implementation of the recommended mitigation measures, neither the Project or Alternative 4 would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Impacts would be less than significant under the Project and Alternative 4, with the impacts of Alternative 4 slightly less owing to less construction activities and development and thus less potential for the accidental release of hazardous materials during construction and operation.

Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction and operational activities under both the Project and Alternative 4 could emit hazardous emissions (e.g., diesel emissions) and handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of McKinley Elementary School. Furthermore, pre-existing hazardous materials conditions (e.g., ASTs, ACMs, LBPs, etc.) exist at the Project Site, and construction activities under both the Project and Alternative 4 could potentially disturb associated hazardous materials and release them into the environment. However, through compliance with applicable regulations and manufacturer instructions, and with implementation of the recommended mitigation measures, neither the Project or Alternative 4 would expose students at the school to substantial health risks. Impacts would be less than significant under both the Project and Alternative 4, with the impacts of Alternative 4 slightly less owing to less construction activities and development and thus less potential for the emission of hazardous materials during construction and operation.

Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Santa Monica Boulevard, Olympic Boulevard, and the Santa Monica Freeway are City-designated disaster routes. Like the Project, Alternative 4 would include new driveways and street network

improvements along Santa Monica Boulevard, could include temporary lane closures and/or detours during construction, and would generate construction- and operations-related vehicle trips. However, no streets would be blocked or substantially altered under either the Project or Alternative 4 (with the exception of 21st Street, the northern portion of which would be vacated and replaced with a new north-south street between Santa Monica Boulevard and Broadway under both the Project and Alternative 4). Furthermore, any temporary lane closures or detours during construction would be undertaken under a required Construction Management Plan and would be reviewed and approved by the City. Lastly, the Project Site and surrounding area are served by a fully developed grid street system that offers multiple routes to each destination. Therefore, like the Project, Alternative 4 would not impair implementation or physically interfere with an adopted emergency response or evaluation plan, and the impact would be less than significant. Because Alternative 4 would generate less construction and operational vehicle trips than the Project, impacts would be less under this alternative.

Hydrology and Water Quality

Would the project:

- *Violate any water quality standards or waste discharge requirements, or otherwise degrade surface or ground water quality?*
- *Substantially alter the existing drainage patterns of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would:*
  - *(i) Result in substantial erosion or siltation on- or off-site; or*
  - *(ii) Create or contribute runoff water which would provide substantial additional sources of polluted runoff?*
- *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to inundation?*
- *Conflict with or obstruct implementation of a water quality control plan?*

Like the Project, Alternative 4 could potentially contribute pollutants in stormwater runoff during construction and operation that could drain to impaired receiving waters (e.g., Santa Monica Bay). However, both the Project and Alternative 4 would comply with applicable water quality regulatory requirements (e.g., City's Runoff Conservation and Sustainable Management Ordinance, City LID requirements) which have been formulated to comply with the TMDLs and avoid both violation of waste discharge requirements and substantial degradation of the water quality of the receiving waters. Compliance with these requirements would ensure that water quality impacts would be less than significant under both the Project and Alternative 4. These requirements include, but are not limited to, retaining stormwater from either the 0.75 inch per 24-hour storm or the 85th percent storm, whichever is greater, and implementing structural and non-structural water quality BMPs. Because of the reduced amount of development and associated construction and operational activities under Alternative 4, and the associated reduction in the potential for the deposition of pollutants on ground that could be carried away in stormwater runoff, the level of the impacts would be less under this alternative.

The LARWQCB maintains the Water Quality Control Plan for the Los Angeles Region (Basin Plan) in accordance with federal and State Law. The Basin Plan establishes beneficial uses for surface and groundwater in the region, and sets forth the regulatory water quality standards to protect those designated beneficial uses. In cases where the Basin Plan does not contain a water quality objective for a particular pollutant, other criteria are used to establish a standard. Other criteria may be applied from SWRCB documents (e.g., the Inland Surface Waters Plan and the Pollutant Policy Document) or from water quality criteria developed under Section 304(a) of the CWA. Permits issued to control pollution (i.e. waste discharge requirements and NPDES permits) must implement Basin Plan requirements (i.e. water quality standards), taking into consideration beneficial uses to be protected.

Construction and operational activities under both Alternative 4 and the Project would comply with all applicable water quality regulations, including but not limited to: (1) NPDES MS4 Permit requirements, implementation of an NPDES Construction General Permit SWPPP and ECSP, and SCAQMD rules, all of which require the implementation of BMPs during construction to control sedimentation, erosion, and pollutant loading of stormwater runoff from construction sites; (2) LARWQCB Construction Dewatering General Permit (NPDES Permit No. CAG994004) requirements for any construction dewatering; and (3) NPDES MS4 Permit requirements, City urban runoff (including stormwater retention) and LID BMP requirements, and City Runoff Mitigation Plan requirements. These requirements have been formulated to comply with the TMDLs for Santa Monica Beach and Santa Monica Bay, and to avoid substantial erosion, sedimentation, and pollutant loading of stormwater runoff from development during construction and operation. Therefore, with compliance with these requirements, Alternative 4 and the Project would comply with the Basin Plan, the impact would be less than significant, and the level of the impact would be similar between the Project and Alternative 4.

Would the project:

- *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*
- *Conflict with or obstruct implementation of a sustainable groundwater management plan?*

Alternative 4, like the Project, would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that it would impede sustainable groundwater management. This is because both the Project and Alternative 4 would not: (1) have a substantial effect on the ratio of pervious to impervious surfaces at the Project Site; (2) include groundwater withdrawals (other than, potentially, small amounts of groundwater associated with any required dewatering); (3) overlay a designated groundwater recharge area; or (4) result in a substantial net increase in demand for water. Therefore, impacts would be less than significant under both the Project and Alternative 4, with the level of impacts generally similar.

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

(i) Result in substantial erosion, siltation, or flooding on- or off-site?

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

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

(iv) Impede or redirect flood flows?

The Project and Alternative 4 would not substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, as no stream or river bisects the Project Site and as site drainage under both the Project and Alternative 4 would continue to be conveyed to the municipal storm drains in the adjacent streets. Similarly, neither the Project or Alternative 4 would result in substantial erosion or siltation as both projects would comply with applicable regulations (e.g., the City's Runoff Conservation and Sustainable Management Ordinance) which have been formulated to avoid substantial erosion and siltation during construction and operation, and because during operation, all of the Project Site's ground surface would be covered by either impervious surfaces or landscaping. Impacts would be similar between the Project and Alternative 4.

With regard to impacts on the capacity of existing or planned stormwater drainage infrastructure, peak stormwater runoff from the Project Site would be expected to be reduced slightly under both the Project and Alternative 4. This is because the amount of impervious surfaces would decrease slightly under both the Project and Alternative 4 owing to increased landscaping and open space, and because both would be subject to NPDES MS4 Permit and City LID requirements to retain stormwater from either the 0.75 inch per 24-hour storm or the 85th percent storm, whichever is greater. Therefore, neither the Project or Alternative 4 would exceed the capacity of the local stormwater drainage system, and impacts would be less than significant under both. The level of impact would be similar between the Project and Alternative 4 as both would include the same amount of pervious and impervious surfaces[9], implement the same stormwater retention requirements, and generate the same amount of stormwater runoff.

The Project Site is not located in a FEMA designated 100-year floodplain or an area susceptible to flooding by the failure of a levee or dam. Therefore, neither the Project nor Alternative 4 would place housing or other structures within a 100-year floodplain, impede or redirect flood flows, and/or 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. Impacts would be less than significant under, and similar between, the Project and Alternative 4.

[9] Despite that Alternative 4 would include less development than the Project, the building footprints and the amount of open space and landscaping would be similar between the two projects (e.g., the reduction in floor area under Alternative 4 would be achieved through reduced building heights rather than smaller building footprints).

The Project Site is not subject to potential inundation by seiche, tsunami or mudflow. Therefore, the Project and Alternative 4 would not be subject to these potential hazards, and impacts would be less than significant and similar between the Project and Alternative 4.

Land Use and Planning

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

LUCE

The Project Site is designated by the LUCE as Healthcare District. LUCE goals and policies call for preserving and enhancing existing neighborhoods; encouraging walking, bicycling, and public transit; integrating land use and transportation to reduce per capita vehicle trips and GHG emissions; providing affordable housing; increasing open space and enhancing the pedestrian access; supporting the responsible expansion of the PSJHC; and updating the HASP. Both the Project and Alternative 4 would be consistent with the Healthcare District land use designation and goals/policies of the LUCE such that they would not result in significant impacts resulting from inconsistency with this plan. Impacts would be less than significant under both the Project and Alternative 4. However, impacts would be greater under Alternative 4 because it would not be as effective as the Project in achieving some of the LUCE goals and policies (for example, integrating land use and transportation to reduce per capita vehicle trips and GHG emissions, supporting the responsible expansion of the PSJHC, supporting the continued vitality of the City's hospitals, working with the hospitals to create a TDM district, etc.). Neither the Project nor Alternative 4 would result in significant impacts as a result of inconsistencies with the LUCE. However, because the Project more closely meets the objectives of the LUCE, impacts associated with land use and planning would be less than under Alternative 4.

HASP

The HASP establishes two overlays, SJ-N and SJ-S to govern the development of the PSJHC. The HASP defers to the PSJHC 1998 DA and Master Plan with respect to development standards and use regulations for the PSJHC Campus. The Project would be consistent with the HASP with approval of the proposed amendments to the HASP to reflect the Project, Phase II Master Plan, and DA. These amendments would include related maps, background information, development standards, objectives, and implementation program. Neither the Project nor Alternative 4 would result in significant impacts aa a result of inconsistency with the HASP. Alternative 4 would similarly be consistent with the HASP with the proposed amendments

PSJHC Development Agreement

Neither the Project nor Alternative 4 would exceed the development rights vested to PSJHC by the City in the 1998 DA of 799,000 total for Phase II development (with a max. of 744,000 square feet above-grade), except that the Project would require an amendment to the DA to increase the vested floor area for Hospital/Health Care use from 354,000 square feet to 404,000 square feet. Both the Project and Alternative 4 would also be consistent with the height and setback requirements of the DA, but would require amendments to the DA to extend the Phase II vested rights. Both the Project

and Alternative 4 would also require amendments of the DA for the proposed pedestrian bridge over Santa Monica Boulevard and expansion of the Mullin Entry Plaza including the addition of the Mullen Plaza Cafe. With the proposed amendments to the DA, both the Project and Alternative 4 would be consistent with the DA and neither would result in significant impacts as a result of conflict with the DA's development parameters. However, Alternative 4 would require fewer amendments to the DA and, as such, land use and planning impacts with respect to the DA would be less than under the Project.

Zoning

All of the Phase II Development Sites are zoned HMU, except that a small portion of Site S5 is zoned MUBL. Both the Project and Alternative 4 would include land uses that are consistent with the zoning of the Project Site such that the impact would be less than significant under both the Project and Alternative 4. This is because: (1) both would include the use types permitted in these zones and generally the setbacks required; (2) both would provide the community benefits required to qualify for Tier 2 building heights; and (3) the PSJHC DA overrides the zoning during the term of the DA (e.g., until 2053).The only substantive difference would be that the Project would be developed to the Tier 2 heights permitted in the MUBL zone (e.g., 105 ft.) with the required public benefits, while Alternative 4 would be developed to the Tier 2 heights permitted in the HMU zone (e.g., 70 ft.). Neither the Project nor Alternative 4 would result in significant impacts as a result of inconsistencies with zoning. However, because the Project would provide more public benefit through greater open space than under Alternative 4, it would more closely meet the community benefit objectives of the HMU zone. Land use and planning impacts related to zoning would be less under the Project than under Alternative 4.

SCAG RTP/SCS

As indicated in Section 4.11, *Land Use and Planning*, the Project would be consistent with RTP/SCS goals (see Table 4.11-5), with key points supporting this conclusion as:

- The Project would provide for the expansion of its health care and related facilities within the Healthcare District, near two Expo Light Rail stations, near bus lines along Santa Monica Boulevard and 20th Street, and would implement a TDM program to reduce single-occupancy vehicle trips.
- The Project would provide new bicycle connections to the dedicated bicycle lane on Broadway, bicycle parking, pedestrian pathways, and widened sidewalks on Santa Monica Boulevard and Broadway to encourage active transportation.
- The Project would incorporate sustainability features to improve air quality, such as optimizing passive strategies to reduce energy use (e.g., building orientation, operable windows, and shading); solar photovoltaic panels; solar water heating; green roofs; low-flow fixtures; energy efficient heating, ventilation, HVAC and lighting; electrical vehicle charging stations; and a TDM program to reduce single-occupancy vehicle trips.

Because the above key points would also apply to Alternative 4, Alternative 4 would also be consistent with the RTP/SCS, impacts under this alternative. Neither the Project nor Alternative 4 would result in significant impacts due to any inconsistencies with the RTP/SCS. Therefore, land

use and planning impacts related to plan consistency would be less than significant and similar under both the Project and Alternative 4.

Neighborhood Effects

Both Alternative 4 and the Project would result in a net increase in development at the Project Site and associated construction and operational activities, and as such, would generate neighborhood effects within the Mid-City neighborhood. The Project would result in less than significant neighborhood effects in terms of aesthetics, land use, noise, and air quality, with significant unavoidable neighborhood effects in terms of (traffic) operational intersection and street segment LOS impacts. Alternative 4 would result in similar impacts, although the level of these impacts would be less than under the Project owing to approximately 22 percent less development under this alternative. Although neighborhood traffic impacts at one intersection would be significant and unavoidable under both the Project and Alternative 4, impacts with respect to neighborhood effects would be incrementally less under Alternative 4 than under the Project.

Noise and Vibration

A significant impact would occur if the project would result in the 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?

A significant impact would occur if the project would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction

Both the Project and Alternative 4 would require the use of heavy motorized construction equipment (graders, excavators, etc.) and stationary construction equipment (generators, electric hand tools, etc.) for on-site construction activities (e.g., demolition, grading, excavation, foundation/concrete pouring, building construction, etc.). This, along with construction vehicle trips (haul trucks, construction worker vehicle trips, etc.) on area streets, would generate varying levels of temporary noise during the approximately 22-year construction period.

As evaluated in Section 4.13, *Noise and Vibration*, of this EIR, Project construction activities would not exceed SMMC noise restrictions at existing adjacent noise-sensitive receptors before 10 a.m. or after 3 p.m. While Project construction activities would temporarily or periodically increase ambient noise levels at some of the surrounding sensitive receptors, impacts would be less than significant due in part to noise attention between the noise source and receptors, City limits on the times of day when construction activities can occur; and PDF NOISE-1 requiring properly operating mufflers on construction equipment, locating construction staging areas as fall as possible from noise-sensitive uses, and installing temporary noise barriers.

Because Alternative 4 would include less net new development than the Project, it is anticipated that it would result in less construction activity, and thus less total construction noise than the Project (although maximum day construction activities and associated noise during these maximum construction days would be similar between the Project and Alternative 4). Hence, impacts would

be less than significant under Alternative 4 as well, with the level of impact less under this alternative

With regards to construction vehicular noise, as indicated in Section 4.13, Project construction vehicular noise would not increase existing roadway noise levels by 5 dBA CNEL or greater, and the impact would be less than significant. Because Alternative 4 would include less development than the Project, and generate less construction vehicle trips (although it would be expected to generate the same amount of construction vehicle trips during maximum day construction activities), impacts would be less than significant under Alternative 4 as well. The level of impact would be less under Alternative 4 owing to less construction vehicle trips during non-maximum construction days.

Operation

Both the Project and Alternative 4 would include net increases in on-site mechanical equipment (e.g., HVAC systems, emergency generators, etc.), parking structure and loading dock use, outdoor open space activity, and operational vehicle trips could contribute to increased noise levels. As indicated in Section 4.13 of this EIR for the Project, all mechanical equipment would be designed with noise control devices or enclosures that limit exterior noise levels to 60 dBA during the day and 50 dBA at night[10], parking structure and loading dock use would not increase ambient noise levels by more than 5 dBA, outdoor open space activity would not increase noise levels at 50 ft by more than 5 dBA Leq, and operational vehicle trips would not increase noise by more than 5 dBA CNEL, such that operational noise impacts would be less than significant.

Alternative 4 would include approximately 22 percent less development than the Project and thus would include less mechanical equipment, parking structure use, outdoor open space activity, and operational vehicle trips. Additionally, it would be required to comply with the same City noise regulations as the Project, and as such Alternative 4 would also result in less than significant operational noise impacts. The level of these impacts would be slightly less under Alternative 4 owing to less operational noise under this alternative.

In addition to Section 4.13 evaluating each of the above-listed operational noise sources of the Project individually, it evaluates the Project's composite noise generated by all these noise sources together. However, because vehicular noise levels would be the dominant noise source from Project operations, and because Project operational roadway noise impacts would be less than significant, so too would the Projects composite noise. For these same reasons, the composite operational noise impacts of Alternative 4 would be less than significant, with the level of impact less owing to less operational vehicular noise under this alternative.

Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

[10] PDF-NOISE-7 requires an acoustical analysis of the proposed mechanical plans to ensure that all mechanical equipment is designed to meet City noise limits.

Construction

As indicated in Section 4.13, *Noise*, Project construction would include the use of heavy construction equipment at the Project Site that could generate groundborne vibration levels that exceed both the FTA structural damage threshold of 0.3 in/sec PPV at the nearest existing buildings and the FTA sensitive use threshold for surgical uses of 0.008 in/sec PVV.[11] Mitigation Measure NOISE-2 would prevent vibration impacts to vibration sensitive medical equipment at Medical Office Buildings not owned/controlled by Saint John's that participate in Mitigation Measure NOISE-2 through location inventory, simulation testing, equipment relocation, equipment isolation, not conducting construction during active use of equipment, or alternative construction methods. Thus, potentially significant construction vibration impacts at participating Medical Office Buildings not owned/controlled by Saint John's would be reduced to a less than significant level. However, for any medical office buildings not owned/controlled by Saint John's that do not participate in Mitigation Measure NOISE-2, project construction vibration could result impacts to vibration sensitive medical equipment.

Because the use of heavy construction equipment would also occur during construction of Alternative 4, groundborne vibration levels under Alternative 4 could also potentially exceed the above thresholds. For any Medical Office Buildings not owned/controlled by Saint John's that do not participate in Mitigation Measure NOISE-2, construction vibration under Alternative 2 could also result in significant impacts to vibration sensitive medical equipment. Therefore, the impact would be significant and unavoidable under both Alternative 4 and the Project. The level of the impacts would be less under Alternative 4 than under the Project owing to less development and thus less construction activities and associated groundborne vibration under this alternative.

Operation

Operation of both the Project and Alternative 4 would include the use of mechanical equipment and would generate vehicle trips, both of which would generate small amounts of groundborne vibration. However, as indicated in Section 4.13 of this EIR, Project operation would not cause groundborne vibration that exceeds applicable thresholds (e.g., the FTA's structural damage and surgical use thresholds discussed previously, as well as the human annoyance threshold of 72 VdB). Because Alternative 4 would include similar uses but less development than the Project, it too would generate less than significant operations-related ground-borne vibration, with the level of impact less under this alternative.

Population and Housing

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

[11] Per the SMMC, construction activities are exempt from human annoyance thresholds for groundborne vibration.

Like the Project, Alternative 4 would represent infill development at a site and within an area already fully served by roads and other infrastructure, and thus would not extend roads or infrastructure or indirectly induce substantial population growth.

Both the Project and Alternative 4 would maintain the existing number of multi-family residential units at the Project Site by replacing the 10 existing vacant multi-family housing units within Site S2 with 10 new multi-family housing units. Therefore, neither the Project or Alternative 4 would directly induce substantial population growth by proposing new housing. Also, both the Project and Alternative 4 would result in a net increase in medical and associated uses at the Project Site that would create new jobs, with this increase less under this alternative owing to less net new development. Still the increases in employment under both the Project and Alternative 4 would be consistent with the employment growth projected in the City's LUCE and SCAG's 2016-2040 RCP/SCS because: (1) the number of new employees under both would represent small proportions of the total employment growth projected; (2) this increase in employment is already included in the growth projections; and (3) both would develop less uses, and thus generate less employees, than has been vested at the Project Site by the 1998 PSJHC DA[12]. Therefore, Alternative 4, like the Project, would not directly induce substantial population growth. Impacts would be less than significant under both the Project and Alternative 4, with the level of impacts similar.

Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Both the Project and Alternative 4 would replace the 10 existing vacant, rent controlled multi-family residential units at Site S4 with 10 new multi-family housing units (of which two would be deed restricted as affordable housing units). Therefore, Alternative 4 would not displace substantial number of existing housing or people, and like the Project, would result in less than significant impacts, with the level of impacts similar.

Police Protection

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

Similar to the Project, construction and operational activities under Alternative 4 would create a demand for police protection services and could potentially slow emergency response times and interfere with emergency access. However, as with the Project: (1) the increase in demand would be small, and would be off-set through site security features (construction fencing, controlled access, 24-hour security guards/patrols, etc.) and compliance with City security and lighting requirements; and (2) adequate emergency access would be maintained through implementation of the required Construction Management Plan and City (including SMPD) review/approval of the

[12] The PSJHC 1998 DA (Section 3.7.3(a)-(b)) established vested rights for up to 799,000 square feet of floor area, 10 replacement apartments, and up to 100 visitor housing units at the Phase II Development Sites.

proposed site plan. Furthermore, consistent with the *City of Hayward v. Trustees of California State University* (Court of Appeal of the State of California, 2015), significant impacts under CEQA consist of adverse changes in any of the physical conditions caused by a project, and potential impacts on emergency response times are not an environmental impact that CEQA requires a project to mitigate. Therefore, Alternative 4, like the Project, would not require new or expanded police protection facilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant. Because Alternative 4 would include less development and thus generate less demand for police protection services than the Project, impacts would be less under this alternative.

Fire Protection

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

Similar to the Project, construction and operational activities under Alternative 4 would create a demand for fire protection services and fire flow, and could potentially slow emergency response times and interfere with emergency access. However, as with the Project: (1) the increase in demand for service would be off-set through fire prevention features (including automatic sprinkler systems in all buildings) and regulatory compliance; (2) adequate emergency access would be maintained through implementation of the required Construction Management Plan and City (including SMFD) review/approval of the proposed site plan; and (3) adequate fire flow would be assured through the provision of required fire hydrants, payment of the City's Water Capital Facility Fee, and provision of improvements to off-site water lines if required. Furthermore, consistent with the *City of Hayward v. Trustees of California State University* (Court of Appeal of the State of California, 2015), significant impacts under CEQA consist of adverse changes in any of the physical conditions caused by a project, and potential impacts on emergency response times are not an environmental impact that CEQA requires a project to mitigate. Therefore, Alternative 4, like the Project, would not require new or expanded fire protection facilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant. Because Alternative 4 would include less development and thus generate less demand for fire protection services than the Project, impacts would be less under this alternative.

Transportation

Would the Project conflict with a program, plan, ordinance or addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?

Both Alternative 4 and the Project would include mixed-use medical and residential development on the Campus consistent with the LUCE, SMMC, and Hospital Area Specific Plan, although Alternative 4 would include less medical development than the Phase II development planned for under the 1998 PSJHC DA and subsequent amendments. The primary goals of the LUCE and SCAG's 2016 RTP/SCS with regard to alternative transportation in Santa Monica are focused on

shifting trips away from single-occupancy vehicles to more sustainable modes of travel such as transit, bicycling, and walking. To achieve this goal, the LUCE encourages the development of mixed-use communities with attractive and safe bicycle and pedestrian facilities that are also well connected to high-capacity and frequent transit service. Both Alternative 4 and the Project would support the LUCE policies that encourage alternative transportation in that both would: (1) represent a mixed-use development and the intensification of urban density on an infill site in proximity to transit (including two Metro rail stations and multiple bus lines); (2) include pedestrian improvements along Santa Monica Boulevard and Broadway (such as widened sidewalks), improvements to the on-site pedestrian network, and new bicycle parking and connections to the dedicated bike lanes Broadway; and (3) implement a TDM program (PDF-TRAF-2) to encourage the use of alternative transportation and reduce single occupancy vehicle trips and VMT as much as possible. Hence, both the Project and Alternative 4 would result in less than significant impacts in terms of consistency with circulation plans/programs/policies. The level of the impacts would be slightly greater under Alternative 4 owing to slightly less intensification of density in proximity to transit and thus slightly less expected alternative transportation use under this alternative (although both the Project and Alternative 4 would reduce VMT as discussed further below).

Would the Project conflict or be inconsistent with CEQA Guidelines Section, 15063.3, subdivision (b)?

Vehicle Miles Travelled

CEQA Guidelines Section 15064.3(b) applies to an alternative approach to the evaluation of transportation impacts, such as the evaluation of per capita vehicles miles traveled (VMT) in lieu of the evaluation of peak hour vehicle trips. The City has not yet adopted a VMT methodology to address this updated CEQA Guidelines Appendix G Checklist Question. As such, the following VMT analysis is provided for informational purposes (no significance determination provided). VMT under the Project would be an estimated 12.8 miles daily for employees and 8.3 daily for non-workers (e.g., patients and visitors), versus the City average of 19.3 miles. Like the Project, it is anticipated that VMT under Alternative 4 would be less than the City average owing to the intensification of density in proximity to transit and implementation of the proposed TDM Program (PDF-TRAF-2). Therefore, both the Project and Alternative 4 would reduce VMT per capita, as well as regional air emissions, GHG emissions, and gasoline demand. The level of impact would be slightly greater under Alternative 4 because this alternative would result in less density near transit, and thus likely slightly greater VMT, than the Project.

Intersection Operations

As indicated in Table 5-2, Alternative 4 operation would generate an estimated net increase of 551 AM peak hour trips, 641 PM peak hour trips, and 8,359 daily weekday trips at buildout (2042), versus the Project which would generate an estimated net increase of 641 AM peak hour trips, 754 PM peak hour trips, and 9,826 daily trips at buildout. Hence, Alternative 4 would generate approximately 15 percent less operational vehicle trips than the Project.

As indicated in Tables 5-5 and 5-6, under the HCM methodology, the Project's Approval Year[13] (2019) impact at 23rd Street and Arizona Avenue (Study Intersection 42), and Future Year (2042) impact at Bundy Drive & Ocean Park Boulevard (Study Intersection 80), would not occur under Alternative 4. Intersection impacts under the CMA methodology would be similar to those of the Project. In all, 13 intersections would be significantly impacted under Alternative 4 before mitigation versus 14 under the Project. With implementation of the mitigation measures identified in Section 4.17, 10 intersections (e.g., Intersections 26, 33, 42, 44, 50, 53, 74, 79, 82 and 83) would be significantly and unavoidably impacted under Alternative 4 versus 11 under the Project (both assuming approval of the mitigation measures by the applicable regulatory agencies). Therefore, similar to the Project, Alternative 4 would result in a significant unavoidable impact to intersection operations. The level of impact would be less under Alternative 4 owing to one less intersection significantly unavoidably affected, and less vehicle trips under this alternative.

Street Segment Operations

Both the Project and Alternative 4 would generate an increase in operational vehicle trips that would exceed applicable base ADT standards along some of the 17 study street segments in the Project Site vicinity. Alternative 4 would result in significant operational base ADT impacts along two street segments, Arizona Avenue and 23rd Street (versus six under the Project). As with the Project, no feasible mitigation is available to mitigate these impacts. Therefore, both the Project and Alternative 4 would result in significant unavoidable street segment operations impacts. The level of impact would be less under Alternative 4 owing to fewer street segments significantly impacted under this alternative.

CMP Traffic Analysis

Vehicle trips generated by the Project would not result in exceedance of Metro's CMP screening threshold (e.g., 150 trips during the AM or PM peak hour) at the mainline freeway monitoring locations analyzed. Because Alternative 4 would result in less trip generation than the Project but would share similar trip characteristics, it too would not result in exceedance of Metro's CMP screening thresholds at the mainline freeway monitoring locations analyzed. However, the Project would exceed Metro's screening threshold (e.g., 50 trips during the AM or PM peak hour) at three arterial intersections including Intersections 47 (Cloverfield Blvd/Santa Monica Blvd.), 60 (2th St./Wilshire Blvd.), and 77 (Bundy Dr./Santa Monica Blvd.), and Alternative 4 could potentially do the same. Still, neither the Project or Alternative 4 would result in exceedance of the CMP guideline's significance thresholds at these intersections (e.g., an increase in vehicle trips of 2% of capacity, causing LOS F, or, if the facility is already at LOS F, an increase in vehicle trips of 2% of capacity). Therefore, impacts would be less than significant under both the Project and Alternative 4, with the level of impacts less under Alternative 4 owing to less trip generation under this alternative.

CMP Transit Analysis

The transit person trips expected to be generated by the Project would represent less than 1 percent of the capacity of the bus lines and Metro rail lines serving the study area and the Project Site.

[13] The Approval Year (2019) condition (e.g., existing + Project condition) is evaluated for information purposes only as required by CEQA.

Because Alternative 4 would result in less demand for transit than the Project, owing to less development and therefore less employees and patients, it too would result in less than 1 percent of the capacity of the bus and rail lines serving the study area of the Project Site. This level of ridership increase would represent a less than significant impact on the regional transit system under both the Project and Alternative 4, with the level of impact less under Alternative 4 owing to less transit demand under this alternative.

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

As indicated in Section 4.17, *Transportation*, the Project would not include any hazardous design feature such as sharp curves or dangerous intersections either on- or off-site (e.g., all proposed intersections would be at right-angles and signal or stop controlled, and the City would review all proposed street improvements for safety and compliance with City Code requirements). Furthermore, the Project would include the development of medical and residential uses rather than the types of uses (e.g., industrial, landfill, agriculture, etc.) that could potentially generate substantial truck or farm equipment that is hazardous or incompatible. Therefore, the Project would result in less than significant impacts with regard to hazards due to design features. As with the Project, Alternative 4 does not include any hazardous design features, such as sharp curves or dangerous intersections, or types of uses that would generate substantial truck traffic. Therefore, Alternative 4 would result in less than significant impacts, with the level of impacts similar to those of the Project.

Would the Project result in inadequate emergency access?

As discussed in Sections 4.9, *Hazards and Hazardous Materials*, 4.15, *Police Protection*, and 4.16, *Fire Protection*, emergency access to the Project Site is currently available directly from several large arterials, including Arizona Avenue, Santa Monica Boulevard, Broadway, and 20th Street. Also: (1) the Project does not propose the closure or the major modification of these streets; and (2) the proposed site plan and associated street improvements would be reviewed and approved by multiple City Departments to ensure compliance with City code requirements and the provision of adequate emergency access. Furthermore, the Project proposes medical uses and would be located immediately adjacent to Saint John's Hospital such that immediate emergency medical service would always be available. Lastly, a Construction Management Plan (PDF-TRAF-1) would be implemented to, in part, ensure the continued provision of emergency access during the construction period. Therefore, the Project would not result in inadequate emergency access, and the impact would be less than significant. For these reasons, including the proximity of large arterials, no major street closures or modifications, and continued provision of emergency access through building location under Alternative 4, this alternative would result in less than significant impacts, with the level of impacts being similar between the Project and Alternative 4.

Tribal Cultural Resources

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

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k); or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

No tribal cultural resources, as defined in PRC Section 21074, were identified as located on the Project Site during the tribal consultations required by AB 32. Therefore, the Project and Alternative 4 would not cause a substantial adverse change in the significance of tribal cultural resources, and no impact would occur under either.

Water Supply

Would the project require or result in the relocation or construction of new or expanded water facilities or the expansion of existing facilities, the construction or relocation of which would cause significant environmental effects?

As with the Project, domestic water and fire flow water required for Alternative 4 would be sourced from the same public water mains. Under both the Project and Alternative 4: (1) the northern portion of the existing water line in 21st Street would be relocated west to 20th Place and then connect back to the existing water line in 21st Street, or alternatively protected in place; (2) new water laterals would be installed connecting the proposed buildings to the existing 8-inch water lines in 20th Street and the existing 12-inch water line in 21st Street, Santa Monica Boulevard, and Broadway; and (3) all buildings would be developed with fire suppression sprinklers which, per the SSMC, would reduce fire flow requirements.

As indicated in Section 4.18, *Water Supply*, flow test results conducted for the Project indicate that: (1) adequate capacity exists in the existing water lines to provide the required domestic water needs of the Project; and (2) while four additional fire hydrants would be required, implementation of Mitigation Measure MM-WS-1 requiring provision of the hydrants would provide the required fire flow. Because Alternative 4 would include less development than the Project, and thus less of a demand for domestic water and fire flow, these same conclusions apply to Alternative 4 as well.

The environmental effects of construction of the on-site water infrastructure for both the Project and Alternative 4 is subsumed in the impact analyses for the other environmental topics evaluated in this EIR (e.g., air quality, noise, etc.). Also, the environmental effects of the construction of the required off-site water infrastructure improvements (e.g., fire hydrants) would be minimal owing to their limited area of disturbance, their location within the existing streets rights-of-way, and compliance with the proposed Construction Traffic Management Program. Therefore, neither the

Project or Alternative 4 would require or result in the construction of new water facilities or the expansion of existing facilities, the construction of which would cause significant environmental effects. The impacts of both the Project and Alternative 4 would be less than significant, with the level of impacts being similar.

Would the project have sufficient water supplies available to service the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Alternative 4 would result in a net increase in development at the Project Site of 447,445 square feet of floor area (exclusive of structured parking), as compared to 571,945 net new square feet under the Project. This net increase in development would generate an increase in water demand from the City under both the Project and Alternative 4. **Table 5-13**, *Alternative 4 – Estimated Water Demand*, provides an estimate of the increase in water demand under Alternative 4. As indicated, Alternative 4 would generate an small decrease in water demand of an estimated 191,727 GPD or 214.5 AFY (compared to 195,293 GPD or 215 AFY under the Project).

The City's 2015 UWMP analyzes the reliability of the City's water resources to meet water demand for normal, single-dry and multiple-dry year scenarios though 2040. The City's 2040 water supply during these scenarios is projected to be 155 percent, 142 percent, and 150 percent of demand, respectively (7,223 AF, 6,031 AF, and 6,659 AF, respectively. Therefore, the UWMP projects that the City would have adequate water supply to meet its demand, and in fact would have substantially more supply than demand, through at least the 2040 planning horizon of the UWMP. Because the estimated increase in water demand under the Project and Alternative 4 would each represent very small proportions of these surpluses, the City's water supplies would be adequate to meet water demand during normal, dry and multiple dry years under both the Project and Alternative 4. No new or expanded water entitlements would be required, and impacts would be less than significant under both the Project and Alternative 4. As water demand would be less under Alternative 4, the level of impacts under this alternative would be less than under the Project.

The above analysis is conservative because: (1) it assumes that Project water demand is not accounted for in the UWMP's water demand projections, when in fact this demand is most likely included as the projections are based on zoning and both the Project and Alternative 4 would be consistent with zoning; (2) it does not account for reductions in Project water demand associated with the implementation of required water conservation features; and (3) the 2015 UWMP was completed prior to the adoption of the City's Water Neutrality Ordinance such that the City's future water demand would likely be less than that projected in the 2015 UWMP.

TABLE 5-13
ALTERNATIVE 4 – ESTIMATED WATER DEMAND

Development Site	Uses	Floor Area/ Units per Use	Wastewater Generation Factor[a]	Water-Wastewater Ratio[a]	Average Water Demand	
					GPD	AFY
2I	Medical Office	50,000 sf	250 gal/ksf	1.5	18,750	21.0
	Health-Related Services, Restaurant, or Neighborhood Commercial Uses	4,500 sf	250 gal/ksf	1.5	1,688	1.9
	Up to four levels of subterranean parking	137,828 sf	20 gal/ksf	1.5	4,136	4.63
2C	Hospital/Health Care, Medical Research, or Health & Wellness Center	87,400 sf	250 gal/ksf	1.5	32,775	36.7
	Health-Related Services, Restaurant, or Neighborhood Commercial Uses	5,500 sf	250 gal/ksf	1.5	2,063	2.3
	Up to four levels of subterranean parking	87,010 sf	20 gal/ksf	1.5	2,610	2.9
2D/E	Hospital/Health Care, Medical Research, or Health & Wellness Center	75,500 sf	250 gal/ksf	1.5	28,313	31.7
	Health-Related Services, Restaurant, or Neighborhood Commercial Uses	3,000 sf	250 gal/ksf	1.5	1,125	1.3
	Up to four levels of subterranean parking	115,729 sf	20 gal/ksf	1.5	3,473	3.89
S1	Daycare	9,000 sf	120 gal/ksf	1.5	1,620	1.8
	Child and Family Development Center	25,500 sf	120 gal/ksf	1.5	4,590	5.1
	Up to five levels of subterranean parking	303,973 sf (includes S3)	20 gal/ksf	1.5	9,119	10.21
S3	Hospital/Health Care, Medical Research, or Health & Wellness Center	91,000 sf	250 gal/ksf	1.5	34,125	38.2
	Health-Related Services, Restaurant, or Neighborhood Commercial	5,000 sf	250 gal/ksf	1.5	1,875	2.1
	Up to five levels of subterranean parking	(Included in S1, above)	20 gal/ksf	1.5	-	-
S4	Hospital/Health Care, Medical Research or Health & Wellness	125,000 sf	250 gal/ksf	1.5	46,875	52.5
	Health-Related Services and/or Neighborhood Commercial	8,200 sf	250 gal/ksf	1.5	3,076	3.4
	Restaurant	1,800 sf	50 gal/ksf	1.5	135	0.2
	Up to five levels of subterranean parking	347,365 sf (Includes S5)	20 gal/ksf	1.5	10,421	11.67
S5	Visitor Housing	38,000 sf (34 units)	150 gal/du	1.5	7,650	8.6
	Up to five levels of subterranean parking	(Included in S4, above)	20 gal/ksf	1.5	-	-
S2	Multi-Family (Replacement) Housing	8,500 sf (10 units)	150 gal/du	1.5	2,250	2.5
	Restaurant or Neighborhood Commercial	800 sf	50 gal/ksf	1.5	60	0.1
	Up to two levels of subterranean parking	23,987 sf	20 gal/ksf	1.5	720	0.81
				TOTAL (GROSS)	**217,449**	**243.51**
				EXISTING	**25,722**	**29**
				TOTAL (NET)	**191,727**	**214.5**

Acronyms/Abbreviations: sf = square feet; ksf = 1,000 sf; gal = gallon; gpd = gallons per day; du = dwelling unit

[a] Todd Groundwater, Water Supply Assessment for Providence Saint John's Health Center Phase II Project, July 2018.

SOURCE: ESA, April 2019.

Wastewater

Would the Project require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects?

Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Similar to the Project, Alternative 4 would construct hospital/health care, medical research, medical office, neighborhood commercial, restaurant, day care, and residential uses that would result in a net increase in wastewater flows requiring treatment by the HTP. Wastewater discharges under both the Project and Alternative 4 would be typical of the wastewater already generated at the Phase II Development Sites; it would not include large quantities of any unusual industrial/hazardous discharges (such as sometimes associated with large industrial facilities, oil refineries, etc.) that can sometimes interfere with the ability of a treatment plant meeting the water quality requirements for its discharges. Furthermore, LARWQCB, in connection with the implementation of the NPDES program, has imposed requirements on the treatment of wastewater, and the wastewater produced by Alternative 4 and the Project would meet these requirements through treatment at the HTP which includes full secondary treatment that reduces wastewater solids by at least 95 percent. Given the above, and because the discharges from the HTP would be required to meet LARWQCB wastewater treatment requirements, Alternative 4, like the Project, would not exceed wastewater treatment requirements of the applicable RWQCB, and the impact would be less than significant. Because Alternative 4 would generate less wastewater than the Project, the level of the impact would be less under this alternative.

Alternative 4 would result in a net increase in development at the Project Site of 447,445 square feet of floor area (exclusive of structured parking), as compared to 571,945 square feet under the Project. This increase in development would generate an increase in wastewater generation requiring conveyance and treatment under both the Project and Alternative 4. **Table 5-14**, *Alternative 4 – Estimated Wastewater Generation*, provides an estimate of wastewater generation under Alternative 4. As indicated, Alternative 4 would generate a net increase in wastewater of an estimated 119,241 GPD (compared to up to 154,158 GPD under the Project).

TABLE 5-14
ALTERNATIVE 4 – ESTIMATED WASTEWATER GENERATION

Development Site	Uses	Floor Area/ Units per Use	Wastewater Generation Factor[a]	Wastewater Generation (GPD)
2I	Medical Office	50,000 sf	250 gal/ksf	12,500
	Health-Related Services, Restaurant, or Neighborhood Commercial Uses	4,500 sf	250 gal/ksf	1,125
	Up to four levels of subterranean parking	137,828 sf	20 gal/ksf	2,757
2C	Hospital/Health Care, Medical Research, or Health & Wellness Center	87,400 sf	250 gal/ksf	21,850
	Health-Related Services, Restaurant, or Neighborhood Commercial Uses	5,500 sf	250 gal/ksf	1,375
	Up to four levels of subterranean parking	87,010 sf	20 gal/ksf	1,740
2D/E	Hospital/Health Care, Medical Research, or Health & Wellness Center	75,500 sf	250 gal/ksf	18,875
	Health-Related Services, Restaurant, or Neighborhood Commercial Uses	3,000 sf	250 gal/ksf	750
	Up to four levels of subterranean parking	115,729 sf	20 gal/ksf	2,315
S1	Daycare	9,000 sf	120 gal/ksf	1,080
	Child and Family Development Center	25,500 sf	120 gal/ksf	3,060
	Up to five levels of subterranean parking	303,973 sf (includes S3)	20 gal/ksf	6,079
S3	Hospital/Health Care, Medical Research, or Health & Wellness Center	91,000 sf	250 gal/ksf	22,750
	Health-Related Services, Restaurant, or Neighborhood Commercial	5,000 sf	250 gal/ksf	1,250
	Up to five levels of subterranean parking	(Included in S1, above)	20 gal/ksf	-
S4	Hospital/Health Care, Medical Research or Health & Wellness	125,000 sf	250 gal/ksf	31,250
	Health-Related Services and/or Neighborhood Commercial	8,200 sf	250 gal/ksf	2,050
	Restaurant	1,800 sf	50 gal/ksf	90
	Up to five levels of subterranean parking	347,365 sf (includes S5)	20 gal/ksf	6,947
S5	Visitor Housing	38,000 sf (34 units)	150 gal/du	5,100
	Up to five levels of subterranean parking	(Included in S4, above)	20 gal/ksf	-
S2	Multi-Family (Replacement) Housing	8,500 sf (10 units)	150 gal/du	1,500
	Restaurant or Neighborhood Commercial	800 sf	50 gal/ksf	40
	Up to two levels of subterranean parking	23,987 sf	20 gal/ksf	480
			TOTAL (GROSS)	144,963
			EXISTING	**25,722**
			TOTAL (NET)	119,241

Acronyms/Abbreviations: sf = square feet; ksf = 1,000 sf; gal = gallon; gpd = gallons per day; du = dwelling unit

[a] Todd Groundwater, Water Supply Assessment for Providence Saint John's Health Center Phase II Project, July 2018.

SOURCE: ESA, April 2019.

The Project Site is served by three existing 12-inch sewer lines, one each in Santa Monica Boulevard, 20th Street, and Broadway. Each of these lines serves a different portion of the Project Site. As indicated in Section 4.19, *Wastewater*, wastewater flows under the Project would not exceed the City's flow threshold (e.g., 50 percent of full capacity) in the 20th Street line, but would exceed this threshold in both the Broadway and Santa Monica Boulevard lines. Adequate wastewater conveyance capacity would be available under the Project and Alternative 4 with: (1) the proposed upsizing of a portion of the Broadway line; and (2) implementation of Mitigation Measure MM-WW-1 with regards to the Santa Monica line.

With regards to wastewater treatment capacity, as indicated in Section 4.19, the HTP has a dry weather capacity of 450 mgd, currently treats 275 mgd, and has a remaining available capacity 175 mgd. The net increase in sewage associated with the Project would be up to approximately 0.09 of the remaining available capacity of the HTP, compared to approximately 0.07 percent under Alternative 4. Because this would represent a minimal increase in the demand for treatment capacity, and because the required treatment capacity is available, no expansion of wastewater treatment capacity would be required under either the Project or Alternative 4.

The environmental effects of construction of the on-site wastewater infrastructure for both the Project and Alternative 4 is subsumed in the impact analyses for the other environmental topics evaluated in this EIR (e.g., air quality, noise, etc.). Also, the environmental effects of the construction of the required off-site sewer line improvements would be minimal owing to their limited area of disturbance, their location within the rights-of-way of the surrounding streets, and implementation of the proposed Construction Traffic Management Program. Therefore, neither the Project or Alternative 4 would require or result in the construction of new wastewater facilities or the expansion of existing facilities, the construction of which would cause significant environmental effects. The impacts of both the Project and Alternative 4 would be less than significant, with the level of impacts similar.

Solid Waste

Would the Project generate solid waste in excess of State or local standards or in excess of the capacity of the local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

As indicated in *Section 4.20*, *Solid Waste*, the Project would generate an estimated 302,027 tons of construction solid waste and 0.93 tons per day of operational solid waste. The construction solid waste would require disposal at the County's only operating inert landfill (Azusa Land Reclamation) or at any of a number of IDEFOs in the County such as the Arcadia Reclamation Facility, while the operational solid waste would require disposal at one or more of the 12 Class III landfills currently serving the City. Because this solid waste would represent only approximately 0.54 percent and 0.002 percent, respectively, of the remaining construction and operational solid waste disposal capacity at these facilities, sufficient permitted solid waste disposal capacity is available to serve the Project and impacts would be less than significant. Alternative 4 would include less development than the Project, and therefore generate less construction and operational solid waste. Therefore, impacts would also be less than significant under Alternative 4, with the

level of the impacts less than under the Project owing to less demand for disposal capacity under this alternative.

Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Both the Project and Alternative 4 would be implemented in compliance with applicable federal, state, and local statutes and regulations related to solid waste. In accordance with SMMC Section 8.108.010, the Applicant would submit a WMP for C&D waste meeting City requirements as part of the application packet for demolition permits and construction will achieve at least a 70 percent solid waste diversion rate. With regard to waste generated during operation, both the Project and Alternative 4 would provide refuse and recycling bins to accommodate the solid waste streams generated by the proposed uses, and would house these bins in enclosed refuse areas in compliance with SMMC Section 9.21.130 (Resource Recovery and Recycling Standards). In accordance with Assembly Bill 1826, separate recycling bins for organic waste would be provided, and arrangements would be made for organic waste recycling services. Therefore, the impacts of the Project and Alternative 4 would be less than significant, with the level of the impacts generally similar.

5.6.4.3 Relationship of the Alternative to the Project Objectives

Alternative 4 proposes development of the Phase II Development Sites with similar healthcare and related uses to the Project, except that development would occur consistent with the HMU Tier 2 maximum building height (e.g., 70 ft.) instead of the MUBL Tier 2 maximum building height (105 ft.), thereby resulting in less building floor area. All other development attributes (e.g., building footprints, open space, street system modifications, below-grade tunnel improvements, above-grade pedestrian connection, etc.) would be the same as under the Project.

Alternative 4 would mostly meet all of the Project objectives. It would mostly meet Objective 1 – Health Care and Related Uses and Facilities, by ensuring that PSJHC functions as part of an integrated health services delivery system that provides a range of care for Santa Monica and surrounding communities by providing state-of-the-art acute care, outpatient (ambulatory) treatment, health and medical research, illness and disease prevent, community health education, and patient and facility support services and facilities. It would meet Objective 2 – Required Uses and Facilities, but ensuring that PSJHC provides child care and replacement housing in accordance with the DA. It would mostly meet Objective 3 – Phase II Master Plan Development Program, by developing a comprehensive Master Plan for Phase II of the PSJHC Campus and a Development Program that are designed to achieve the other Project objectives, accommodate the uses vested by the DA, integrate the campus, ensure that acute care, outpatient treatment and related services are situated near each other, meet the 35 percent open space objective of the Project, and ensure that PSJHC remains in continuous operation as a hospital and health care facility during development. It would mostly meet Objective 4 – Mobility and Circulation, by developing and implementing a comprehensive circulation plan for vehicles, bicycles and pedestrians and providing connections between buildings via these modes of travel, and providing a pedestrian and bicycle-friendly campus. It would mostly meet Objectives 5 – Parking, and 6 – Minimizing VMT, by providing

sufficient parking to meet PSJHC peak parking demand, implementing a TDM program, and providing a complimentary mix of land uses. It would meet Objective 7 – Minimize Phase II Impacts, by ensuring that the Phase II Phasing Plan and schedule minimize impacts on PSJHC neighbors and existing uses to the extent reasonably feasible.

However, Alternative 4 would not be as effective in meeting some of the objectives because it would not: (1) provide the range and/or extent of medical services to be provided under the Project due to its reduced amount of floor area (Objective 1); (2) accommodate all the Phase II development vested by the DA or provide 35 percent of the Project Site as open space (Objective 3); or (3) reduce VMT to the same extent of the Project due to lower-density development than the Project in close proximity to transit (Objective 5). It would be more effective than the Project in minimizing impacts on PSJHC neighbors (Objective 7) due to less development and thus less construction and operational activities and vehicle trips.

Overall, Alternative 4 would be less effective than the Project in meeting the Project objectives.

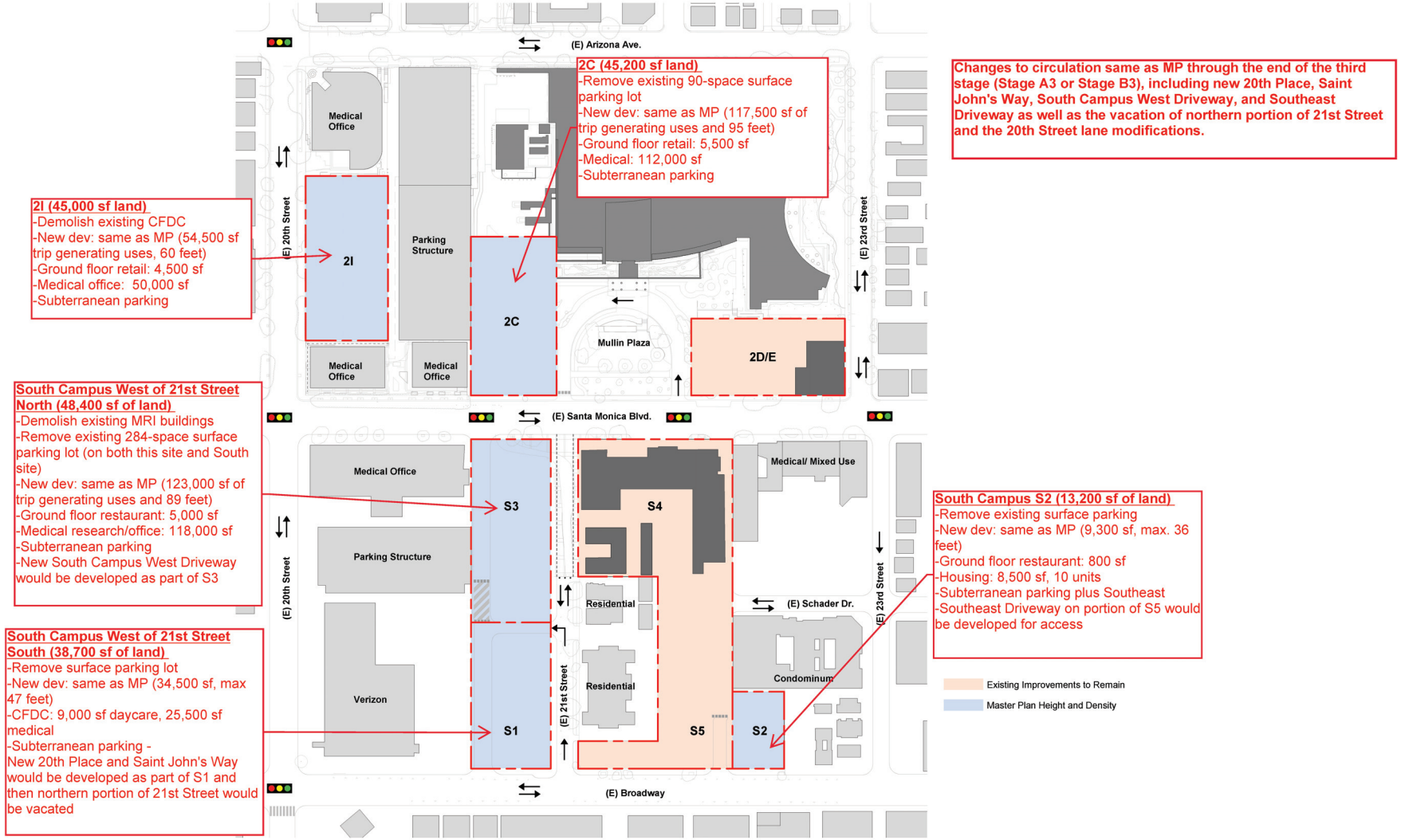
5.6.5 Alternative 5 – Partial Master Plan

5.6.5.1 Description of the Alternative

This alternative represents a reduction in the Phase II Master Plan, with the assumption that only some phases of the Master Plan would be implemented. Under Alternative 5, total development on the Saint John's Campus would be reduced as compared to the Master Plan. Specifically, no development for 2D/E, S4, or S5 would occur (e.g., no Education and Conference Center, East Ambulatory Care and Research Building, visitor housing, or East Ambulatory & Acute Care Building), and existing uses (e.g., PSJHC Foundation Building, John Wayne Cancer Institute, and surface parking) would remain as they are on these sites.

Under Alternative 5, Sites 2I, 2C, S1, S3, and S2 would be redeveloped with the same programming as the Master Plan. The building location, uses, and building setbacks are assumed to be generally the same as the Project. In addition, Alternative 5 assumes the same proposed street network as the Master Plan, including new streets such as 20th Place and Saint John's Way and the vacation of the northern portion of 21st Street. Furthermore, similar to the Project, the west tunnel connection and the above-grade pedestrian connection over Santa Monica Boulevard would be constructed, and utility relocations would be required.

The development at the Project Site under this alternative is specified further in **Figure 5-4** and **Table 5-15**, and is discussed further below. As indicated therein, this alternative would include 357,600 square feet of new floor area (including 10 du), or a net increase of 247,545 square feet (including 10 du).



SOURCE: Perkins Eastman, October 2018

Providence Saint John's Health Center Phase II Project

Figure 5-4
Alternative 5 – Partial Master Plan

ESA

TABLE 5-15
ALTERNATIVE 5 (PARTIAL MASTER PLAN) - DEVELOPMENT SUMMARY

Development Site	Uses	Floor Area/ Units per Use	Max. Building Floor Area	Max. Height
2I	Medical Office	50,000 sf	73,300 sf	60 feet
	Health-Related Services, Restaurant, or Neighborhood Commercial	4,500 sf		
	Up to four levels of subterranean parking			
2C	Hospital/Health Care, Medical Research, or Health &Wellness Center	112,000 sf	117,500 sf	95 feet
	Health-Related Services, Restaurant, or Neighborhood Commercial	5,500 sf		
	Up to four levels of subterranean parking			
S1	Daycare	9,000 sf	34,500 sf	47 feet
	Child and Family Development Center	25,500 sf		
	Up to five levels of subterranean parking			
S3	Hospital/Health Care, Medical Research, or Health & Wellness Center	118,000 sf	123,000 sf	89 feet
	Health-Related Services, Restaurant, or Neighborhood Commercial	5,000 sf		
	Up to five levels of subterranean parking			
S2	Multi-Family (Replacement) Housing	8,500 sf (10 units)	9,300 sf	36 feet
	Restaurant or Neighborhood Commercial	800 sf		
	Up to two levels of subterranean parking			
		TOTAL (GROSS)	**357,600 sf (includes 10 du)**	
		TOTAL (NET)	**247,545 sf (includes 10 du)**	

SOURCE: PSJHC, 2018

Site 2I: 20th Street Medical Building

Alternative 5 would demolish the existing Child & Family Development Center at Site 2I, which is approximately 34,670 square feet, and develop a new medical office building on the approximately 45,000 square feet 2I site. As with the Project, the 20th Street Medical Building would be a maximum of 54,500 square feet of trip generating uses and a total maximum building area of 73,300 square feet. For the purposes of a worst case analysis and consistent with the Master Plan, this alternative assumes 4,500 square feet of ground floor Health-Related Services, Restaurant, or Neighborhood Commercial Uses (same as Project) and 50,000 square feet of Medical Office. The maximum height would be 60 feet (same as Project). Similar to the Project, there would be up to four levels of subterranean parking. Site access to Site 2I would be the same as the Project.

Site 2C: West Ambulatory & Acute Care Building

Similar to the Project, Alternative 5 would remove the existing surface parking (West Lot) and landscaping in the North Campus and construct the West Ambulatory & Acute Care Building (2C) with subterranean parking on the approximately 45,200 2C site. Development of the West Ambulatory & Acute Care Building (2C) would be the same as the Project, with a maximum of

117,500 square feet containing a mix of Hospital/Health Care, Medical Research uses, or Health & Wellness Center uses and ground floor Health-Related Services, Restaurant and/or Neighborhood Commercial Uses. It is assumed that a maximum of 112,000 square feet of Hospital/Health Care, Medical Research, and/or Health & Wellness Center uses and 5,500 square feet of ground-level Health-Related Services, Restaurant or Neighborhood Commercial Uses would be developed at this site. The maximum height would be 95 feet (same as Project). There would be up to four levels of subterranean parking beneath the West Ambulatory & Acute Care Building (2C). Site access to Site 2C would be the same as the Project except that the Mullin Plaza ingress driveway would remain at its current location (and not be expanded onto Site 2D/E).

Site S1

Alternative 5 would remove the existing surface parking lot and develop approximately 38,700 square feet of property located at Site S1with the same development program as the Master Plan. Specifically, this area would be developed with a maximum 34,500 square feet of uses consisting of 9,000-15,000 square feet Daycare with remaining dedicated to the Child and Family Development Center. For conservative analysis (similar to the Project), this site is studied conservatively assuming 9,000 square feet Daycare and 25,500 square feet Child and Family Development Center/use. The maximum height would be 47 feet (same as Project). Similar to the Project, a subterranean parking garage with up to five levels of underground parking would be provided. Site access to Site S1 would be the same as the Project.

Site S3

The northern portion of the South Campus west of 21st Street includes the existing temporary MRI Building and existing surface parking lot comprising approximately 48,400 square feet of land area. Alternative 5 would demolish these uses and replace them with the same development program as the Master Plan. Specifically, S3 would be developed with 118,000 square feet of Hospital/Health care, Medical Research, and/or Health & Wellness Center space and 5,000 square feet of ground floor Health-Related Services, Restaurant, and/or Neighborhood Commercial Uses for a total of 123,000 square feet. The maximum height would be 89 feet (same as Project). Similar to the Project, a subterranean parking garage with up to five levels of underground parking would be provided. Site access to Site S3 would be the same as the Project.

Site S2

Alternative 5 would develop approximately 13,200 square feet of land within the South Campus, east of 21st Street (Site S2). Similar to the Project, Alternative 5 would replace the existing surface parking lot with a total of 9,300 square feet, consisting of 10 units of replacement multi-family apartments (Multi-Family Housing) and 800 square feet of ground floor Restaurant and/or Neighborhood Commercial Uses. Similar to the Project, a subterranean parking garage with up to two levels of underground parking would be provided. Site access to Site S2 would be the same as the Project.

5.6.5.2 Environmental Impacts

Aesthetics

The following aesthetics analysis regarding views, scenic resources, light and glare, and shading is provided for informational purposes only, since impacts are less than significant for employment projects within urban areas, pursuant to PRC Section 21099(d)(1). See Section 4.1, *Aesthetics*, of this EIR for further discussion of PRC Sections 21099(d)(1) and (d)(2)(A).

Would the project have a substantial adverse effect on a scenic vista?

As stated in Section 4.1, due to distance and intervening topography, views of the Pacific Ocean are limited from east to west corridors along Santa Monica Boulevard, Broadway, and Arizona Avenue near the Project Site. Limited views of the Santa Monica Mountains to the north are available from north and south corridors such as 23rd Street and 20th Street adjacent to the Project Site. There are no protected views or view corridors within the Project area and no scenic vistas across the Project Site.

Alternative 5 would not include new development on Sites 2D/E, S4 and S5, but would include the same development as proposed under the Project for Sites 2I, 2C, S1, S2 and S3. Hence, development under Alternative 5 would result in less changes to existing views from certain public vantage points (especially along Santa Monica Boulevard and Broadway. However, as with the Project, no scenic vista of the Santa Monica Mountains to the north or the Pacific Ocean to the west currently exist across the Project Site. Both the Project and Alternative 5 would include a pedestrian bridge over Santa Monica Boulevard, but because there are no public parks, scenic overlooks, scenic highways, or other public gathering places in the immediate vicinity of the Project Site that have views of the mountains and Pacific Ocean. Therefore, neither the Project or Alternative 5 would have substantial adverse effects on scenic vistas, with the impact being similar due to the absence of nearby scenic vistas.

Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway or a locally-designated scenic corridor?

The Project Site is not located on or near a State scenic highway or locally-designated scenic corridor. Furthermore, while there are several off-site historic resources within the viewshed of the Project Site, neither the Project or Alternative 5 would impact these resources or materially impact the setting in which these resources occur. Both the Project and Alternative 5 would remove two potential historic resources: the John Wayne Cancer Institute and the Child & Family Development Center, which are considered excellent examples of Mid Century Modern architecture. However, the loss of these resources from an aesthetic perspective would be off-set to some degree under both the Project and Alternative 5 by new construction exhibiting high quality architecture, landscape design, and increased open space, and in accordance with PRC Section 21099(d)(1), this impact is not identified as significant under either the Project or Alternative 5. The level of the impact would be similar to the Project under Alternative 5.

Would the project conflict with applicable zoning and other regulations governing scenic quality?

As indicated in Section 4.1, *Aesthetics*, the Project would alter the visual character of the Project Site in that, while the Project Site is already urbanized, the Project would intensify development at the site. However, as discussed in Section 4.1, the Project would be consistent with applicable zoning and other regulations that govern scenic quality

As with the Project, Alternative 5 would be designed to be consistent with objectives of the HASP to support harmony of design within the PSJHC campus and between the medical campus and the surrounding community. However, Alternative 5 would not expand Mullin Plaza or include the Mullin Plaza café with outdoor dining. It would not include Saint John's Square or the 900 Saint John's Café with outdoor dining, Sun Garden open space adjacent to the 1440 E. 23rd Street condominiums, or the South Garden and other open space adjacent to the 1423 21st Street apartments and Geneva Plaza senior housing building. Because Alternative 5 would not provide the Project's same level of pedestrian improvements or landscaped open space, which soften visual effects and buffer adjacent disparate uses in accordance with LUCE and the HASP, impacts related to aesthetics would be greater under Alternative 5 than under the Project.

Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Both the Project and Alternative 5 would create new sources of light and glare. However, while there are several light-sensitive uses in the immediate vicinity, the Project Site and surrounding area is already a lit urban environment. Furthermore, all proposed new exterior light sources would be shielded, and all proposed lighting and exterior building facades would be required to comply with SMMC requirements and undergo City design review by the ARB. Therefore, neither the Project or Alternative 5 would create new sources of substantial light or glare that could adversely affect day or nighttime views in the area. Impacts would be less under Alternative 5 owing to less development, and thus less lighting and a lower potential for glare generation under this alternative.

Would the project create shading effects that would interfere with the use of outdoor open space or solar accessibility?

As indicated in Section 4.1, the Project would not shade any existing shadow-sensitive uses in the vicinity (e.g., Berkley East Convalescent Hospital, small apartment buildings and single-family residences along Arizona Avenue and 21st Street, McKinley Elementary School, etc.) for more than 3 hours during the winter or for more than 4 hours during the remaining seasons. Thus, the Project would not create shading effects that could interfere with the use of outdoor open space or solar accessibility. As development under Alternative 5 would be the same as under the Project at Sites 2I, 2C, S1, S2 and S3 as the Project, and as no new development would occur under this alternative at Sites 2D/E, S4 and S5, associated shading would similarly not interfere with the use of outdoor open space or solar accessibility. Therefore, shading impacts would be less under Alternative 5 owing to less new development and less shading (including less shading of the small apartment buildings along 21st Street).

Air Quality

Would the project conflict with or obstruct implementation of the applicable air quality plan?

Like the Project, construction and operation of Alternative 5 would generate emissions that would contribute to basin-wide air pollutant emissions, including construction NO_x and PM10 and operational NOx emissions that exceed SCAQMD thresholds before mitigation, and operational NO_x emissions that exceed SCAQMD thresholds after mitigation. Like the Project, Alternative 5 would: (1) comply with SCAQMD Rule 403 requirements during construction; (2) represent "sustainable growth in close proximity to mass transit consistent with SCAG RTP/SCS goals and SB 375 to reduce regional VMT; and (3) be consistent with LUCE and SCAG RTP/SCS growth projections. Like the Project, Alternative 5 would not obstruct implementation of the AQMP, and impacts would be less than significant.

Would the project 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?

Regional Construction Emissions

Under Alternative 5, construction activities at the Project Site would be reduced from those that would occur under the Project owing to the reduced amount of new development and associated demolition, excavation, grading, soil export, and truck vehicle trips (including truck haul trips) under this alternative. Because the Project's regional construction emissions would be less than the SCAQMD's significance thresholds for most criteria pollutants and ozone, precursors, so too would regional construction emissions under Alternative 5. Still, like the Project, construction activities under Alternative 5 would be expected to exceed applicable SCAQMD regional maximum daily emissions thresholds for NOx, even with compliance with SCAQMD Rule 403 (Control of Fugitive Dust), given the substantial exceedance of the NO_x threshold under the Project (167 lbs/day vs. the threshold of 100 lbs/day). However, impacts would be less than significant after mitigation (MM-AIR-1) under both the Project and Alternative 5, with impacts less under Alternative 5.

Regional Operational Emissions

Operational emissions were assessed for area, energy, mobile, and stationary sources for the Project in Section 4.2, *Air Quality*, with emissions from mobile sources (vehicle trips) making up the largest component of the operational emissions. Under Alternative 5, the net increase in development at the Project Site would be 247,545 versus 571,945 square feet under the Project, a reduction of approximately 57 percent. This would translate into a reduction in the number of weekday net vehicle trips to/from the Project Site of from 9,826 to 6,042 trips, with an associated reduction in regional operational emissions. Because of the reduced floor area under Alternative 5, area, energy and stationary source emissions would also be less. Similar to the Project, Alternative 5 would be required to meet regulatory energy efficiency requirements and would reduce regional VMT and associated mobile source emissions given its infill nature and proximity to mass transit facilities. Still, like the Project, it is conservatively assumed that regional operational emissions associated with Alternative 5 would exceed SCAQMD significance thresholds for NO_x given the substantial exceedance of the NO_x threshold under the Project (e.g., 96 lbs/day vs. the threshold of

55 lbs/day). Impacts would significant unavoidable under both the Project and Alternative 5, with impacts less under Alternative 5.

Would the project expose sensitive receptors to substantial pollutant concentrations?

Localized Emissions

Section 4.2, *Air Quality,* addresses the Project's impacts from construction and operational air pollutant emissions on nearby sensitive receptors. It also evaluates health risks due to toxic air contaminants (TACs) such as diesel emissions (DPM) from haul and delivery trucks. The analysis concludes that the potential increase in NO_x, PM10 and TACs during construction of the Project would exceed applicable SCAQMD significance thresholds at the nearest sensitive receptor locations before mitigation, with these construction impacts less than significant after mitigation. As described previously, construction and operational vehicle trips and activities would be less under Alternative 5 than under the Project. Still, it is conservatively assumed that, like the Project, construction NO_x, PM10 and TAC levels at the nearest sensitive receptor locations would be significant before mitigation, with impacts being less than significant after mitigation. While maximum daily construction impacts would be similar to the Project, because the overall construction duration would be slightly less under this alternative than the Project, construction impacts are considered less under this alternative.

Carbon Monoxide Hotspots

Like the Project, Alternative 5 would generate operational vehicle trips that would incrementally increase CO levels at intersections and roadways within one-quarter mile of sensitive receptors. However, as indicated in Section 4.2, *Air Quality*, the Project would not cause or contribute to an exceedance of the CAAQS one-hour or eight-hour CO standards of 20 or 9.0 parts per million, respectively. Because Alternative 5 would result in less operational vehicle trips than the Project as indicated above, Alternative 5 would similarly not exceed the CAAQS standards. Therefore, impacts would be less than significant under both the Project and Alternative 5, with impacts less under Alternative 5 due to the proportionate decrease in vehicle trips.

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

Like the Project, Alternative 5 would include residential and commercial land uses that would not be expected to introduce substantial sources of odors, refuse and recycling bins would be covered and properly maintained within enclosed areas to prevent adverse odors, and proper housekeeping practices would be implemented to promote odor control. Therefore, like the Project, construction and operation of Alternative 5 would not create objectionable odors affecting a substantial number of people, and impacts would be less than significant. Given the similarities in land uses between the Project and Alternative 5, the impacts of Alternative 5 would be similar to the Project.

Construction Effects

Would construction of the project result in considerable construction-period impacts due to the scope, or location of construction activities?

Similar to the Project, Alternative 5 would include construction activities that would generate temporary aesthetics effects and air emissions, noise/vibration, and vehicle trips. Alternative52 would include approximately 43 percent of the net new development as the Project, and thus would most likely generate approximately 57 percent less total construction activities and associated aesthetics effects, air emissions, noise/vibration, and vehicle trips than the Project. However, the maximum amount of construction-related air emissions, noise/vibration and vehicle trips on a peak construction day would be expected to be similar between the Project and Alternative 5. In any event, similar to the Project, the construction-related aesthetics, air quality (after mitigation), noise/vibration (after mitigation) (except to sensitive medical uses), and traffic impacts of Alternative 5 would be less than significant, while impacts to sensitive medical uses would remain significant and unavoidable. Overall, the level of impacts would be less under this alternative owing to less total construction activities.

Historical Resources

Would the project cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5?

As analyzed in Section 4.4 *Cultural Resources – Historical Resources*, the John Wayne Cancer Institute and CFDC appear eligible for federal, state, and local listing as individual properties, and as such meet the definition of historical resources as outlined in CEQA Guidelines Section 15064.5(a). Additionally, there are four off-site historical resources that have views of the Project Site (Santa Monica Doctors Office at 2125 Arizona Avenue, a corner commercial building at 2301 Santa Monica Boulevard, Kingsley Gates Mortuary at 1925 Arizona Avenue, and McKinley Grammar School at 2401 Santa Monica Boulevard). These four resources are eligible for local listing, and as such meet the definition of historical resources as outlined in CEQA Guidelines Section 15064.5(a).

Like the Project, Alternative 5 would: (1) demolish the CFDC which would represent a significant unavoidable impact and (2) result in less than significant vibration impacts to New Medical Arts Annex (a potentially historic building) after mitigation. Both the Project and Alternative 5 would also implement the same recommended mitigation relating to the CFDC (e.g., recordation and interpretative exhibits) which would reduce but not avoid the significant impact to the CFDC. However, Alternative 5 would retain the John Wayne Cancer Institute, and thus avoid the significant unavoidable impact to this historic resource under the Project. Hence, impacts would be less under this alternative.

Archaeological Resources

Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Section 15064.5?

Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Excavation activities under both the Project and Alternative 5 could potentially encounter archaeological resources and human remains and cause an adverse change in the significance of these resources. Under Alternative 5, the amount of development, building footprints and excavation depths of the subterranean structures would be less. Such impacts would be less than significant after mitigation under both the Project and Alternative 5. Because Sites 2D/E, S4 and S5 would not be developed under Alternative 5, the potential to encounter/impact archaeological resources and human remains would be less under this alternative.

Energy

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

Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Under Alternative 5, construction activities at the Project Site would be reduced from that of the Project owing to the approximately 57 percent less net new development under this alternative. Therefore, energy consumption for construction activities would be reduced. As with the Project, Alternative 5 would use energy efficient construction equipment as well as implement a construction waste management plan during construction. As such energy impacts during construction would also be less than significant.

For the same reason, Alternative 5 would require less energy use from HVAC equipment than the Project, and would generate fewer daily vehicle trips during operation. Furthermore, both the Project and Alternative 5 would use energy efficient procedures and newer equipment as well as implement a construction waste management plan during construction, both would improve energy efficiency beyond regulatory requirements during operation, both would comply with water conservation, energy conservation, and other sustainability requirements of the City's Green Building Code and SMMC, and both would increase urban density in a transit-rich area thereby minimizing vehicle trips and reducing regional VMT. Lastly, neither the Project or Alternative 5 would conflict or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, as with the Project, impacts under Alternative 5 would be less than significant, with the level of impact less under this alternative.

Geology and Soils

Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death, involving: (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides?

The Project Site is not bisected by an active fault with the potential to cause fault rupture at the surface, and no designated Alquist-Priolo Special Study Fault Zone bisects the Project Site, such that the Project Site is not subject to fault rupture. Therefore, the Project and Alternative 5 would not expose people or structure to potential substantial adverse effects caused in whole or in part by the project's exacerbation of existing environmental conditions involving fault rupture, and no impact would occur under either the Project or Alternative 5. Impacts would be similar between the Project and Alternative 5.

With regard to strong seismic ground shaking, the Project Site is subject to strong seismic ground shaking which could result in damage to structures and hazards to people under both the Project and Alternative 5. However: (1) the potential level of ground acceleration is common in Southern California; and (2) the associated effects can be mitigated through compliance with the geotechnical engineering design and construction standards specified by the SMBC and the seismic design parameters for the Project specified in the Preliminary Geotechnical Report. Furthermore, both the Project and Alternative 5 would replace older buildings on the Project Site with modern buildings constructed to the latest building code and seismic safety standards, and both the Project and Alternative 5 would be required to provide adhere to the site-specific recommendations of a Final Geotechnical Report. Therefore, the Project and Alternative 5 would not expose people or structure to potential substantial adverse effects caused in whole or in part by the project's exacerbation of existing environmental conditions involving strong seismic ground shaking, and impacts would be less than significant, with the level of impact similar between the Project and Alternative 5.

With regard to seismic-related ground failure, including liquefaction, while the liquefaction potential at the Project Site is low, development at the Project Site under both the Project and Alternative 5 would be required to implement the recommendations of a site-specific liquefaction evaluation, compliance with which would not expose people or structure to potential substantial adverse effects caused in whole or in part by the project's exacerbation of existing environmental conditions involving liquefaction. Thus liquefaction impacts under both the Project and Alternative 5 would be less than significant, with the level of impact similar.

With regard to landslides, the Project site is not located within a designated landslide area or subject to landslides, and while slope instability is possible during excavations, compliance with the recommendations of the Preliminary and Final Geotechnical Reports would not expose people or structures to potential substantial adverse effects caused in whole or in part by the project's exacerbation of existing environmental conditions involving landslides, Therefore, impacts under both the Project and Alternative 5 would be less than significant, with the level of impact similar.

Would the project 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; caused in whole or in part by the project's exacerbation of the existing environmental conditions?

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

Both the Project and Alternative 5 could be subject to unstable soil conditions and expansive soils if appropriate design measures are not taken. However, both the Project and Alternative 5 would be required to meet State and City Building Code requirements and comply with the design recommendations of the Preliminary and Final Geotechnical Reports. Regulatory compliance would ensure that impacts related to unstable soil conditions and expansive soils, caused in whole or in part by the Project's exacerbation of the existing environmental conditions, would be less than significant and similar between the Project and Alternative 5.

Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Excavation activities under both the Project and Alternative 5 could potentially encounter paleontological resources and cause an adverse change in the significance of these resources. Such impacts would be less than significant after mitigation under both the Project and Alternative 5. Because Sites 2D/E, S4 and S5 would not be developed under Alternative 5, the potential to encounter/impact such resources would be less under this alternative.

Greenhouse Gas Emissions

Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Both the Project and Alternative 5 would generate GHG emissions during construction and operation. Under the Project, the net increase in annual GHG emissions during construction and operation would be 10,356 metric tons of CO2e per year, and impacts would be less than significant with implementation of PDF-1 through PDF-AQ-4. Because Alternative 5 would include less construction and operational activity, vehicle trips, and energy use than the Project, owing to the reduced amount of development under this alternative, and would implement the same PDFs, GHG emissions under this alternative would similarly not exceed the GHG screening level and would be less than significant. Because Alternative 5 would generate less GHG emissions than the Project, owing to less development, impacts would be less under this alternative.

Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG?

As with the Project, Alternative 5 would be required to comply with water conservation, energy conservation, tree-planting, and other sustainability requirements consistent with the City's Green Building Code and SMMC. Thus, similar to the Project, Alternative 5 would not conflict with applicable plans, polices or regulations adopted for the purpose of reducing the emissions of GHGs (e.g., the City's LUCE, Sustainable City Plan, Climate Action Plan, AB 32, SB 375, etc.) with implementation of the proposed PDFs. Impacts would be less than significant under both the Project and Alternative 5, with the level of impact similar as both would be consistent with applicable GHG reduction plans.

Hazards and Hazardous Materials

Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction and operational activities under both the Project and Alternative 5 would include the routine transport, use, storage and disposal of small quantities of hazardous materials. Both the Project and Alternative 5 would also generate small quantities of medical waste during operation similar to the types of medical waste currently generated at the PSJHC campus. However, the transport, use, storage and disposal of hazardous materials during construction and operation would occur in accordance with manufacturer instructions and applicable federal, state and local health and safety regulations (e.g., RCRA and HWCA "cradle to grave" requirements, OSHA workplace and work practices requirements, City HMRRP/HMMP requirements, SMMC requirements, Unified Permit requirements, HASP requirements, etc.) under both the Project and Alternative 5. Such instructions and regulations have been formulated to avoid the exposure of persons and the environment to hazardous materials. Therefore, neither the Project or Alternative 5 would create a significant hazard to the public or the environment through the routine transport, use, storage and disposal of hazardous materials, and impacts would be less than significant. Because the use of hazardous materials would be expected to be less under Alternative 5, owing to less construction and operational activities, the impact would be less under this alternative.

Would the project 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?

Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant of Government Code Section 6592.5, and as a result, it would create a significant hazard to the public or the environment?

Construction and operational activities under both the Project and Alternative 5 would include the use of hazardous materials which could be accidentally released. Furthermore, the Project Site contains two listed hazardous materials sites (open LUST case and former on-site serve stations), and several of the existing on-site buildings contain ACM and LBP. As such, construction activities (e.g., excavation and demolition) under both the Project and Alternative 5 could potentially disturb

and release into the environment hazardous materials associated with these sites/buildings. However, through compliance with applicable regulations and manufacturer instructions, and with implementation of the recommended mitigation measures, neither the Project or Alternative 5 would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Impacts would be less than significant under both the Project and Alternative 5. Impacts would be less under Alternative 5 owing to: (1) less construction and operational activities that could potential involve the use of hazardous materials would occur under this alternative; and (2) not demolishing several existing on-site buildings to be demolished under the Project that may contain ACM and/or LBP.

Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction and operational activities under both the Project and Alternative 5 could emit hazardous emissions (e.g., diesel emissions) and handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of McKinley Elementary School. Furthermore, pre-existing hazardous materials conditions (e.g., ASTs, ACMs, LBPs, etc.) exist at the Project Site, and construction activities under both the Project and Alternative 5 could potentially disturb associated hazardous materials and release them into the environment. However, through compliance with applicable regulations and manufacturer instructions, and with implementation of the recommended mitigation measures, neither the Project or Alternative 5 would expose students at the school to substantial health risks. Impacts would be less than significant under both the Project and Alternative 5. Impacts would be less under Alternative 5 owing to construction activities and development under this alternative, and thus less potential for the emission of hazardous materials during construction and operation.

Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Santa Monica Boulevard, Olympic Boulevard, and the Santa Monica Freeway are City-designated disaster routes. Like the Project, Alternative 5 could include temporary lane closures and/or detours during construction, new driveways and street network improvements, vacation of the northern portion of 21st Street and its replacement with a new north-south street between Santa Monica Boulevard and Broadway, and both construction- and operational vehicle trips. However, any temporary lane closures or detours during construction would be undertaken under a required Construction Management Plan, and both temporary lane closures/detours during construction and new roadway improvements during operation would occur in accordance with the SMMC and be reviewed and approved by the City. Also, the Project Site and surrounding area are served by a fully developed grid street system that offers multiple routes to each destination. Therefore, like the Project, Alternative 5 would not impair implementation or physically interfere with an adopted emergency response or evaluation plan, and the impact would be less than significant. Because Alternative 5 would generate less construction and operational vehicle trips than the Project, and would not include any new or modified driveways or other circulation improvements associated with Sites 2D/E, S4 and S5, impacts would be less under this alternative.

Hydrology and Water Quality

- *Would the project:*
- *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality?*
- *Substantially alter the existing drainage patterns of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would:*

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

(ii) Create or contribute runoff water which would provide substantial additional sources of polluted runoff?

- *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to inundation?*
- *Conflict with or obstruct implementation of a water quality control plan?*

Like the Project, Alternative 5 could potentially contribute pollutants in stormwater runoff during construction and operation that could drain to impaired receiving waters (e.g., Santa Monica Bay). However, both the Project and Alternative 5 would comply with applicable water quality regulatory requirements (e.g., City's Runoff Conservation and Sustainable Management Ordinance, City LID requirements, etc.) which have been formulated to comply with the TMDLs and avoid both violation of waste discharge requirements and substantial degradation of the water quality of the receiving waters. Compliance with these requirements would ensure that water quality impacts would be less than significant under both the Project and Alternative 5. These requirements include, but are not limited to, retaining stormwater from either the 0.75 inch per 24-hour storm or the 85th percent storm, whichever is greater, and implementing structural and non-structural water quality BMPs. Because of the reduced amount of development and associated construction and operational activities under Alternative 5, and the associated reduction in the potential for the deposition of pollutants on ground that could be carried away in stormwater runoff, the level of the impacts would be less under this alternative.

The LARWQCB maintains the Water Quality Control Plan for the Los Angeles Region (Basin Plan) in accordance with federal and State Law. The Basin Plan establishes beneficial uses for surface and groundwater in the region, and sets forth the regulatory water quality standards to protect those designated beneficial uses. In cases where the Basin Plan does not contain a water quality objective for a particular pollutant, other criteria are used to establish a standard. Other criteria may be applied from SWRCB documents (e.g., the Inland Surface Waters Plan and the Pollutant Policy Document) or from water quality criteria developed under Section 304(a) of the CWA. Permits issued to control pollution (i.e. waste discharge requirements and NPDES permits) must implement Basin Plan requirements (i.e. water quality standards), taking into consideration beneficial uses to be protected.

Construction and operational activities under both Alternative 5 and the Project would comply with all applicable water quality regulations, including but not limited to: (1) NPDES MS4 Permit requirements, implementation of an NPDES Construction General Permit SWPPP and ECSP, and SCAQMD rules, all of which require the implementation of BMPs during construction to control sedimentation, erosion, and pollutant loading of stormwater runoff from construction sites; (2)

LARWQCB Construction Dewatering General Permit (NPDES Permit No. CAG994004) requirements for any construction dewatering; and (3) NPDES MS4 Permit requirements, City urban runoff (including stormwater retention) and LID BMP requirements, and City Runoff Mitigation Plan requirements. These requirements have been formulated to comply with the TMDLs for Santa Monica Beach and Santa Monica Bay, and to avoid substantial erosion, sedimentation, and pollutant loading of stormwater runoff from development during construction and operation. Therefore, with compliance with these requirements, Alternative 5 and the Project would comply with the Basin Plan, the impact would be less than significant, and the level of the impact would be similar.

Would the project:

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

- Conflict with or obstruct implementation of a sustainable groundwater management plan?

Alternative 5, like the Project, would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that it would impede sustainable groundwater management. This is because both the Project and Alternative 5 would not: (1) have a substantial effect on the ratio of pervious to impervious surfaces at the Project Site; (2) include groundwater withdrawals (other than, potentially, small amounts of groundwater associated with any required dewatering); (3) overlay a designated groundwater recharge area; or (4) result in a substantial net increase in demand for water. Therefore, impacts would be less than significant under both the Project and Alternative 5, with the level of impacts generally similar.

Would the project:

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

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

  (ii) Exceedance of the capacity of existing or planned stormwater drainage systems; or

  (iii) impede or redirect flood flows

The Project and Alternative 5 would not substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, as no stream or river bisects the Project Site and as site drainage under both the Project and Alternative 5 would continue to be conveyed to the municipal storm drains in the adjacent streets. Similarly, neither the Project or Alternative 5 would result in substantial erosion or siltation as: (1) both would comply with applicable regulations (e.g., the City's Runoff Conservation and Sustainable Management Ordinance) which have been formulated to avoid substantial erosion and siltation during construction and operation; and (2) all of the Project Site's ground surface would be covered by

either impervious surfaces or landscaping during operation. Impacts would be similar between the Project and Alternative 5.

With regard to impacts on the capacity of existing or planned stormwater drainage infrastructure, peak stormwater runoff from the Project Site would be expected to be reduced slightly under both the Project and Alternative 5. This is because the amount of impervious surfaces would decrease slightly under both the Project and Alternative 5 owing to increased landscaping and open space, and because both would be subject to NPDES MS4 Permit and City LID requirements to retain stormwater from either the 0.75 inch per 24-hour storm or the 85th percent storm, whichever is greater. Therefore, neither the Project or Alternative 5 would exceed the capacity of the local stormwater drainage system, and impacts would be less than significant under both the Project and Alternative 5. The level of the impacts would be slightly greater under Alternative 5. This is because, while both the Project and Alternative 5 would result in the same amount of pervious and impervious surfaces at Sites 2I, 2C, S1, S2 and S3, and implement the same stormwater retention requirements in these areas, impervious surface would not increase and PSJHC would not be required to provide additional stormwater retention in Sites 2D/E, S4 and S5.

The Project Site is not located in a FEMA designated 100-year floodplain or an area susceptible to flooding by the failure of a levee or dam. Therefore, neither the Project nor Alternative 5 would place housing or other structures within a 100-year floodplain, impede or redirect flood flows, and/or 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. Impacts would be less than significant under, and similar between, the Project and Alternative 5. The Project Site is not subject to potential inundation by seiche, tsunami or mudflow. Therefore, the Project and Alternative 5 would not be subject to these potential hazards, and impacts would be less than significant and similar.

The Project Site is not subject to potential inundation by seiche, tsunami or mudflow. Therefore, the Project and Alternative 5 would not be subject to these potential hazards, and impacts would be less than significant and similar.

Land Use and Planning

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

LUCE

The Project Site is designated by the LUCE as Healthcare District. LUCE goals and policies call for preserving and enhancing existing neighborhoods; encouraging walking, bicycling, and public transit; providing affordable housing; increasing open space and enhancing the pedestrian access; integrating land use and transportation to reduce per capita vehicle trips and GHG emissions; supporting the responsible expansion of the PSJHC; and updating the HASP. Both the Project and Alternative 5 would be consistent with the Healthcare District land use designation and goals/policies of the LUCE such that the impact would be less than significant under both the Project and Alternative 5. However, Alternative 5 would not be as effective as the Project in achieving some of the LUCE goals and policies (for example, integrating land use and

transportation to reduce per capita vehicle trips and GHG emissions, supporting the responsible expansion of the PSJHC, supporting the continued vitality of the City's hospitals, etc.). Neither the Project nor Alternative 5 would result in significant impacts as a result of inconsistencies with the LUCE. However, because the Project would more closely meet the objectives of the LUCE, land use and planning impacts related to plan consistency would be less than under Alternative 5.

HASP

The HASP establishes two overlays, SJ-N and SJ-S to govern the development of the PSJHC. The HASP defers to the PSJHC 1998 DA and Master Plan with respect to development standards and use regulations for the PSJHC Campus. The Project would be consistent with the HASP with approval of the proposed amendments to the HASP to reflect the Project, Phase II Master Plan, and DA. These amendments would include related maps, background information, development standards, objectives, and implementation program. Alternative 5 would similarly be consistent with the HASP with the proposed amendments. Neither the Project nor Alternative 5 would result in significant impacts as a result of inconsistencies with the HASP. Therefore, land use and planning impacts related to plan consistency would be similar under both the Project and Alternative 5.

PSJHC Development Agreement

Neither the Project nor Alternative 5 would exceed the development rights vested to PSJHC by the City in the 1998 DA of 799,000 total for Phase II development (with a max. of 744,000 square feet above-grade), except that the Project would require an amendment to the DA to increase the vested floor area for Hospital/Health Care use from 354,000 square feet to 404,000 square feet (something not required under this alternative). Both the Project and Alternative 5 would also be consistent with the height and setback requirements of the DA, but would require amendments to the DA to extend the Phase II vested rights. Both the Project and Alternative 5 would also require amendments of the DA for the proposed pedestrian bridge over Santa Monica Boulevard, except that the Project would also require an amendment to the DA for expansion of the Mullin Entry Plaza including the addition of the Mullen Plaza Café (something not required under this alternative). With the proposed amendments to the DA, both the Project and Alternative 5 would be consistent with the DA and the impact would be less than significant. With the proposed amendments to the DA, both the Project and Alternative 5 would be consistent with the DA and neither would result in significant impacts as a result of conflict with the DA's development parameters. However, Alternative 5 would require fewer amendments to the DA and, as such, land use and planning impacts with respect to the DA would be less than under the Project.

Zoning

All of the Phase II Development Sites are zoned HMU, except that a small portion of Site S5 is zoned MUBL. Both the Project and Alternative 5 would include land uses that are consistent with the zoning of the Project Site such that the impact would be less than significant under both the Project and Alternative 5. This is because: (1) both would include the use types permitted in these zones and generally the setbacks required; (2) both would provide the community benefits required to qualify for Tier 2 building heights; and (3) the PSJHC DA overrides the zoning during the term of the DA (e.g., until 2053). Neither the Project nor Alternative 5 would result in significant impacts as a result of inconsistencies with zoning. However, because the Project would provide more public

benefit through greater open space than under Alternative 5, it would more closely meet the community benefit objectives of the HMU zone. The Project's land use and planning impacts related to zoning would be less than under Alternative 5.

SCAG RTP/SCS

As indicated in Section 4.11, *Land Use and Planning*, the Project would be consistent with RTP/SCS goals (see Table 4.11-5), with key points supporting this conclusion as:

- The Project would provide for the expansion of its health care and related facilities within the Healthcare District, near two Expo Light Rail stations, near bus lines along Santa Monica Boulevard and 20th Street, and would implement a TDM program to reduce single-occupancy vehicle trips.
- The Project would provide new bicycle connections to the dedicated bicycle lane on Broadway, bicycle parking, pedestrian pathways, and widened sidewalks on Santa Monica Boulevard and Broadway to encourage active transportation.
- The Project would incorporate sustainability features to improve air quality, such as optimizing passive strategies to reduce energy use (e.g., building orientation, operable windows, and shading); solar photovoltaic panels; solar water heating; green roofs; low-flow fixtures; energy efficient heating, ventilation, HVAC and lighting; electrical vehicle charging stations; and a TDM program to reduce single-occupancy vehicle trips.

Because the above key points would also apply to Alternative 5, Alternative 5 would also be consistent with the RTP/SCS, Neither the Project nor Alternative 5 would result in significant impacts due to any inconsistencies with the RTP/SCS. Therefore, land use and planning impacts related to plan consistency would be less than significant and similar under both the Project and Alternative 5.

Neighborhood Effects

Would the project have considerable effects on the neighborhoods in which they are located?

Both Alternative 5 and the Project would result in a net increase in development at the Project Site, and associated construction and operational activities, that would generate neighborhood effects within the Mid-City neighborhood. The Project would result in less than significant neighborhood effects in terms of aesthetics, land use, noise, air quality, with significant unavoidable neighborhood effects in terms of operational intersection and street segment LOS. Alternative 5 would result in similar impacts, although the level of these impacts would be less than under the Project owing to approximately 43 percent less development under this alternative (247,545 sf net new vs the Project's net new 571,945 sf). Neighborhood traffic impacts would be significant and unavoidable under both the Project and Alternative 5, but such impacts would be incrementally less under Alternative 5 than under the Project.

Noise and Vibration

Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction

Both the Project and Alternative 5 would require the use of heavy motorized construction equipment (graders, excavators, etc.) and stationary construction equipment (generators, electric hand tools, etc.) for on-site construction activities (e.g., demolition, grading, excavation, foundation/concrete pouring, building construction, etc.). This, along with construction vehicle trips (haul trucks, construction worker vehicle trips, etc.) on area streets would generate varying levels of temporary noise during the approximately 22-year construction period.

As evaluated in Section 4.13, *Noise and Vibration*, of this EIR, Project construction activities would not exceed SMMC noise restrictions at existing adjacent noise-sensitive receptors before 10 a.m. or after 3 p.m. While Project construction activities would temporarily or periodically increase ambient noise levels at some of the surrounding sensitive receptors, impacts would be less than significant due in part to noise attention between the noise source and receptors, City limits on the times of day when construction activities can occur; and PDF NOISE-1 requiring properly operating mufflers on construction equipment, locating construction staging areas as fall as possible from noise-sensitive uses, and installing temporary noise barriers.

Because Alternative 5 would include less net new development than the Project, it is anticipated that it would result in less construction activity and thus less total construction noise than the Project (although maximum day construction activities and associated noise during these maximum construction days would be similar between the Project and Alternative 5). Hence, impacts would be less than significant under Alternative 5 as well, with the level of impact less under this alternative

With regard to construction vehicle noise, as indicated in Section 4.13, Project construction vehicle noise would not increase existing roadway noise levels by 5 dBA CNEL or greater, and the impact would be less than significant. Because Alternative 5 would include less development than the Project, and generate less construction traffic (although it would be expected to generate the same amount of construction vehicle trips during maximum day construction activities), impacts would be less than significant under Alternative 5 as well. The level of impact would be less under Alternative 5 owing to less construction vehicle trips during non-maximum construction days.

Operation

Both the Project and Alternative 5 would include net increases in on-site mechanical equipment (e.g., HVAC systems, emergency generators, etc.), parking structure and loading dock use, outdoor open space activity, and operational vehicle trips. As indicated in Section 4.13 of this EIR for the Project, all mechanical equipment would be designed with noise control devices or enclosures that limit exterior noise levels to 60 dBA during the day and 50 dBA at night[14], parking structure and loading dock use would not increase ambient noise levels by more than 5 dBA, outdoor open space activity would not increase noise levels at 50 ft by more than 5 dBA Leq, and operational vehicle

[14] PDF-NOISE-7 requires an acoustical analysis of the proposed mechanical plans to ensure that all mechanical equipment is designed to meet City noise limits.

trips would not increase noise by more than 5 dBA CNEL, such that operational noise impacts would be less than significant.

Alternative 5 would include approximately 57 percent less development than the Project and thus would include less mechanical equipment, parking structure use, outdoor open space activity, and operational vehicle trips. Additionally, it would be required to comply with the same City noise regulations as the Project, and as such, Alternative 5 would also result in less than significant operational noise impacts. The level of these impacts would be slightly less under Alternative 5 owing to less operational noise under this alternative.

In addition to Section 4.13 evaluating each of the above-listed operational noise sources of the Project individually, it evaluates the Project's composite noise generated by all these noise sources together. However, because vehicular noise levels would be the dominant noise source from Project operations, and because Project operational roadway noise impacts would be less than significant, so too would the Projects composite noise. For these same reasons, the composite operational noise impacts of Alternative 5 would be less than significant, with the level of impact less owing to less operational vehicle noise under this alternative.

Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Construction

As indicated in Section 4.13, Project construction would include the use of heavy construction equipment at the Project Site that could generate groundborne vibration levels that exceed both the FTA structural damage threshold of 0.3 in/sec PPV at the nearest existing buildings and the FTA sensitive use threshold for surgical uses of 0.008 in/sec PVV.[15] Mitigation Measure NOISE-2 would prevent vibration impacts to vibration sensitive medical equipment at Medical Office Buildings not owned/controlled by Saint John's that participate in Mitigation Measure NOISE-2 through location inventory, simulation testing, equipment relocation, equipment isolation, not conducting construction during active use of equipment, or alternative construction methods. Thus, potentially significant construction vibration impacts at participating Medical Office Buildings not owned/controlled by Saint John's would be reduced to a less than significant level. However, for any Medical Office Buildings not owned/controlled by Saint John's that do not participate in Mitigation Measure NOISE-2, Project construction vibration could result in significant impacts to vibration sensitive medical equipment.

Because the use of heavy construction equipment would also occur during construction of Alternative 5, groundborne vibration levels under Alternative 5 could also potentially exceed the above thresholds. For any Medical Office Buildings not owned/controlled by Saint John's that do not participate in Mitigation Measure NOISE-2, construction vibration under Alternative 5 could also result in significant impacts to vibration sensitive medical equipment. The level of the impacts

[15] Per the SMMC, construction activities are exempt from human annoyance thresholds for groundborne vibration.

would be less under Alternative 5 than under the Project owing to less development and thus less construction activities and associated groundborne vibration under this alternative.

Operation

Operation of both the Project and Alternative 5 would include the use of mechanical equipment and would generate vehicle trips, both of which would generate small amounts of groundborne vibration. However, as indicated in Section 4.13 of this EIR, Project operation would not cause groundborne vibration that exceeds applicable thresholds (e.g., the FTA's structural damage and surgical use thresholds discussed previously, as well as the human annoyance threshold of 72 VdB). Because Alternative 5 would include similar uses but less development than the Project, it too would generate less than significant operations-related ground-borne vibration, with the level of impact less under this alternative.

Population and Housing

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

Like the Project, Alternative 5 would represent infill development at a site and within an area already fully served by roads and other infrastructure, and thus would not extend roads or infrastructure or indirectly induce substantial population growth.

Both the Project and Alternative 5 would maintain the existing number of multi-family residential units at the Project Site (the Project by replacing the 10 existing vacant multi-family housing units with 10 new multi-family housing units, and Alternative 5 by retaining the existing units). Therefore, neither the Project or Alternative 5 would directly induce substantial population growth by proposing new housing. Also, both the Project and Alternative 5 would result in a net increase in medical and associated uses at the Project Site that would create new jobs, with this increase less under this alternative owing to less net new development. Still the increases in employment under both the Project and Alternative 5 would be consistent with the employment growth projected in the City's LUCE and SCAG's 2016-2040 RCP/SCS because: (1) the number of new employees under both would represent small proportions of the total employment growth projected; (2) this increase in employment is already included in the growth projections; and (3) both would develop less uses, and thus generate less employees, than has been vested at the Project Site by the 1998 PSJHC DA[16]. Therefore, Alternative 5, like the Project, would not directly induce substantial population growth. Impacts would be less than significant under both the Project and Alternative 5, with the level of impacts similar.

Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

[16] The PSJHC 1998 DA (Section 3.7.3(a)-(b)) established vested rights for up to 799,000 square feet of floor area, 10 replacement apartments, and up to 100 visitor housing units at the Phase II Development Sites.

Both the Project and Alternative 5 would maintain the existing number of multi-family residential units at the Project Site (the Project by replacing the 10 existing vacant multi-family housing units with 10 new multi-family housing units, and Alternative 5 by retaining the existing units). Therefore, Alternative 5 would not displace substantial number of existing housing or people, and like the Project, would result in less than significant impacts, with the level of impacts similar.

Police Protection

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

Similar to the Project, construction and operational activities under Alternative 5 would create a demand for police protection services and could potentially slow emergency response times and interfere with emergency access. However, as with the Project: (1) the increase in demand would be small, and would be off-set through site security features (construction fencing, controlled access, 24-hour security guards/patrols, etc.) and compliance with City security and lighting requirements; and (2) adequate emergency access would be maintained through implementation of the required Construction Management Plan and City (including SMPD) review/approval of the proposed site plan. Furthermore, consistent with the *City of Hayward v. Trustees of California State University* (Court of Appeal of the State of California, 2015), significant impacts under CEQA consist of adverse changes in any of the physical conditions caused by a project, and potential impacts on emergency response times are not an environmental impact that CEQA requires a project to mitigate. Therefore, Alternative 5, like the Project, would not require new or expanded police protection facilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant. Because Alternative 5 would include less development and thus generate less demand for police protection services than the Project, impacts would be less under this alternative.

Fire Protection

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

Similar to the Project, construction and operational activities under Alternative 5 would create a demand for fire protection services and fire flow, and could potentially slow emergency response times and interfere with emergency access. However, as with the Project: (1) the increase in demand for service would be off-set through fire prevention features (including automatic sprinkler systems in all buildings) and regulatory compliance; (2) adequate emergency access would be maintained through implementation of the required Construction Management Plan and City (including SMFD) review/approval of the proposed site plan; and (3) adequate fire flow would be assured

through the provision of required fire hydrants, payment of the City's Water Capital Facility Fee, and provision of improvements to off-site water lines if required. Furthermore, consistent with the *City of Hayward v. Trustees of California State University* (Court of Appeal of the State of California, 2015), significant impacts under CEQA consist of adverse changes in any of the physical conditions caused by a project, and potential impacts on emergency response times are not an environmental impact that CEQA requires a project to mitigate. Therefore, Alternative 5, like the Project, would not require new or expanded fire protection facilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant. Because Alternative 5 would include less development and thus generate less demand for fire protection services than the Project, impacts would be less under this alternative.

Transportation

Would the Project conflict with a program, plan, ordinance or addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?

Both Alternative 5 and the Project would include mixed-use medical and residential development on the Campus consistent with the LUCE, SMMC, and Hospital Area Specific Plan, although Alternative 5 would include less medical development than the Phase II development planned for under the 1998 PSJHC DA and subsequent amendments. The primary goals of the LUCE and SCAG's 2016 RTP/SCS with regard to alternative transportation in Santa Monica are focused on shifting trips away from single-occupancy vehicles to more sustainable modes of travel such as transit, bicycling, and walking. To achieve this goal, the LUCE encourages the development of mixed-use communities with attractive and safe bicycle and pedestrian facilities that are also well connected to high-capacity and frequent transit service. Both Alternative 5 and the Project would support the LUCE policies that encourage alternative transportation in that both would: (1) represent a mixed-use development and the intensification of urban density on an infill site in proximity to transit (including two Metro rail stations and multiple bus lines); (2) include pedestrian improvements along Santa Monica Boulevard and Broadway (such as widened sidewalks), improvements to the on-site pedestrian network, and new bicycle parking and connections to the dedicated bike lanes Broadway; and (3) implement a TDM program (PDF-TRAF-2) to encourage the use of alternative transportation and reduce single occupancy vehicle trips and VMT as much as possible. Hence, both the Project and Alternative 5 would result in less than significant impacts in terms of consistency with circulation plans/programs/policies. The level of the impacts would be greater under Alternative 5 owing to less intensification of density in proximity to transit and thus slightly less expected alternative transportation use under this alternative (although both the Project and Alternative 5 would reduce VMT as discussed further below).

Would the Project conflict or be inconsistent with CEQA Guidelines Section, 15064.3, subdivision (b)?

Vehicle Miles Travelled

CEQA Guidelines Section 15064.3(b) applies to an alternative approach to the evaluation of transportation impacts, such as the evaluation of per capita vehicles miles traveled (VMT) in lieu of the evaluation of peak hour vehicle trips. The City has not yet adopted a VMT methodology to

address this updated CEQA Guidelines Appendix G Checklist Question. As such, the following VMT analysis is provided for informational purposes (no significance determination provided). VMT under the Project would be an estimated 12.8 miles daily for employees and 8.3 daily for non-workers (e.g., patients and visitors), versus the City average of 19.3 miles. Like the Project, it is anticipated that VMT under Alternative 5 would be less than the City average owing to the intensification of density in proximity to transit and implementation of the proposed TDM Program (PDF-TRAF-2). Therefore, both the Project and Alternative 5 would reduce VMT per capita, air emissions, GHG emissions, and gasoline demand. The level of impact would be greater under Alternative 5 because this alternative would result in less density in proximity to transit, and thus likely greater VMT per capita, than the Project.

Intersection Operations

As indicated in Table 5-2, Alternative 5 would generate an estimated net increase of 404 AM peak hour trips, 469 PM peak hour trips, and 6,042 daily weekday trips at buildout (2042), versus the Project which would generate an estimated net increase of 641 AM peak hour trips, 754 PM peak hour trips, and 9,826 daily trips at buildout. Hence, Alternative 5 would generate approximately 38 percent less operational vehicle trips than the Project.

As indicated in Tables 5-5 and 5-6, under the HCM methodology the Project's Approval Year[17] (2019) impacts at 23rd Street & Arizona Avenue (Intersection 42) and at Bundy Drive & Ocean Park Boulevard (Intersection 80), and the Project's Future Year (2042) impacts at Cloverfield Boulevard & Olympic Drive (Intersection 50) and at Bundy Drive & Ocean Park Boulevard (Intersection 80), would not occur under Alternative 4. Under the CMA methodology, the Project's Approval Year and Future Year impacts at Centinela Avenue & Santa Monica Boulevard (Intersection 70) and at Barrington Avenue & Wilshire Boulevard (82), and the Project's Future Year impact at Barrington Avenue & Santa Monica Boulevard (Intersection 83), would also not occur. In all, 11 intersections would be significantly impacted under Alternative 5 before mitigation versus 14 under the Project. With implementation of the mitigation measures identified in Section 4.17, 9 intersections (e.g., Intersections 26, 33, 42, 44, 50, 53, 74, 79, and 82) would be significantly and unavoidably impacted under Alternative 4 versus 11 under the Project (both assuming approval of the mitigation measures by the applicable regulatory agencies). Therefore, similar to the Project, Alternative 5 would result in a significant unavoidable impact to intersection operations. The level of impact would be less under Alternative 5 owing to two less intersections significantly unavoidably affected, and less vehicle trips under this alternative.

Street Segment Operations

Both the Project and Alternative 5 would generate an increase in operational vehicle trips that would exceed thresholds along some of the 17 study street segments in the Project Site vicinity. Alternative 5 would result in significant operational base ADT impacts along two street segments, Arizona Avenue and 23rd Street (versus six under the Project). As with the Project, no feasible mitigation is available to mitigate these impacts. Therefore, both the Project and Alternative 5 would result in significant unavoidable street segment operations impacts. The level of impact

[17] The Approval Year (2019) condition (e.g., existing + Project condition) is evaluated for information purposes only as required by CEQA.

would be less under Alternative 5 owing to fewer street segments significantly impacted under this alternative.

CMP Traffic Analysis

Vehicle trips generated by the Project would not result in exceedance of Metro's CMP screening threshold (e.g., 150 trips during the AM or PM peak hour) at the mainline freeway monitoring locations analyzed. Because Alternative 5 would result in less trip generation than the Project but would share similar trip characteristics, it too would not result in exceedance of Metro's CMP screening thresholds at the mainline freeway monitoring locations analyzed. However, the Project would exceed Metro's screening threshold (e.g., 50 trips during the AM or PM peak hour) at three arterial intersections including Intersections 47 (Cloverfield Blvd/Santa Monica Blvd.), 60 (2th St./Wilshire Blvd.), and 77 (Bundy Dr./Santa Monica Blvd.), and Alternative 5 could potentially do the same. Still, neither the Project or Alternative 5 would result in exceedance of the CMP guideline's significance thresholds at these intersections (e.g., an increase in vehicle trips of 2% of capacity, causing LOS F, or, if the facility is already at LOS F, an increase in vehicle trips of 2% of capacity). Therefore, impacts would be less than significant under both the Project and Alternative 5, with the level of impacts less under Alternative 5 owing to less trip generation under this alternative.

CMP Transit Analysis

The transit person trips expected to be generated by the Project would represent less than 1 percent of the capacity of the bus lines and Metro rail lines serving the study area and the Project Site. Because Alternative 5 would result in less demand for transit than the Project, owing to less development and therefore less employees and patients, it too would result in less than 1 percent of the capacity of the bus and rail lines serving the study area of the Project Site. This level of ridership increase would represent a less than significant impact on the regional transit system under both the Project and Alternative 5, with the level of impact less under Alternative 5 owing to less transit demand under this alternative.

Similar to the Project, Alternative 5 would represent a mixed-use development and the intensification of urban density on an infill site in proximity to transit, would include pedestrian and bicycle improvements, and would implement a TDM program to encourage the use of alternative transportation and reduce single occupancy vehicle trips as much as possible. As indicated previously, both the Project and Alternative 5 would also reduce VMT. Therefore, similar to the Project, Alternative would be consistent with adopted City plans, policies, and programs supporting alternative transportation (e.g., LUCE, SMMC, Santa Monica Bike Action Plan, SB 743, SCAG's 2016 RTP/SCS, etc.), and the impact would be less than significant. The level of impacts would be greater under Alternative 5 owing to less VMT-reducing density in proximity to transit.

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

As indicated in Section 4.17, *Transportation*, the Project would not include any hazardous design feature such as sharp curves or dangerous intersections either on- or off-site (e.g., all proposed intersections would be at right-angles and signal or stop controlled, and the City would review all proposed street improvements for safety and compliance with City Code requirements). Furthermore, the Project would include the development of medical and residential uses rather than the types of uses (e.g., industrial, landfill, agriculture, etc.) that could potentially generate substantial truck or farm equipment that is hazardous or incompatible. Therefore, the Project would result in less than significant impacts with regard to hazards due to design features. For these same reasons, Alternative 5 would result in less than significant impacts, with the level of impacts similar under Alternative 5.

Would the Project result in inadequate emergency access?

As discussed in Sections 4.9, *Hazards and Hazardous Materials*, 4.15, *Police Protection*, and 4.16, *Fire Protection*, emergency access to the Project Site is currently available directly from several large arterials, including Arizona Avenue, Santa Monica Boulevard, Broadway, and 20th Street. Also: (1) the Project does not propose the closure or the major modification of these streets; and (2) the proposed site plan and associated street improvements would be reviewed and approved by multiple City Departments to ensure compliance with City code requirements and the provision of adequate emergency access. Furthermore, the Project proposes medical uses and would be located immediately adjacent to Saint John's Hospital such that immediate emergency medical service would always be available. Lastly, a Construction Management Plan (PDF-TRAF-1) would be implemented to, in part, ensure the continued provision of emergency access during the construction period. Therefore, the Project would not result in inadequate emergency access, and the impact would be less than significant. For these same reasons, Alternative 5 would result in less than significant impacts, with the level of impacts similar between the Project and Alternative 5.

Tribal Cultural Resources

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

(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k); or

(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

No tribal cultural resources, as defined in PRC Section 21074, were identified as located on the Project Site during the tribal consultations required by AB 32. Therefore, the Project and Alternative 5 would not cause a substantial adverse change in the significance of tribal cultural resources, and no impact would occur under either the Project or Alterative 5.

Water Supply

Would the project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects?

As with the Project, domestic water and fire flow water required for Alternative 5 would be sourced from the same public water mains. Under both the Project and Alternative 5: (1) the northern portion of the existing water line in 21st Street would be relocated west to 20th Place and then connect back to the existing water line in 21st Street, or alternatively protected in place; (2) new water laterals would be installed connecting the proposed buildings to the existing 8-inch water lines in 20th Street and the existing 12-inch water line in 21st Street, Santa Monica Boulevard, and Broadway; and (3) all buildings would be developed with fire suppression sprinklers which, per the SMMC, would reduce fire flow requirements.

As indicated in Section 4.18, *Water Supply*, flow test results conducted for the water lines serving the Project Site indicate that adequate capacity exists in the existing water lines to provide the required domestic water needs of the Project. Implementation of Mitigation Measure MM-WS-1 would further require four additional hydrants to meet the required fire flow. Because Alternative 5 would include less development than the Project, and thus less of a demand for domestic water and fire flow, these same conclusions apply to Alternative 5 as well.

The environmental effects of construction of the on-site water infrastructure required to serve both the Project and Alternative 5 is subsumed in the impact analyses for the other environmental topics evaluated in this EIR (e.g., air quality, noise, etc.). Also, the environmental effects of the construction of the required off-site water infrastructure improvements (e.g., fire hydrants) would be minimal owing to their limited area of disturbance, their location within the existing streets rights-of-way, and compliance with the proposed Construction Traffic Management Program. As analyzed, neither the Project or Alternative 5 would require or result in the construction of new water facilities or the expansion of existing facilities, the construction of which would cause significant environmental effects. The impacts of both the Project and Alternative 5 would be less than significant, with the level of impacts being similar.

Would there not be sufficient water supplies available to service the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Alternative 5 would result in a net increase in development at the Project Site of 247,545 square feet of floor area (exclusive of structured parking), as compared to 571,945 square feet under the Project. This net increase in development would generate an increase in water demand under both the Project and Alternative 5. **Table 5-16**, *Alternative 5 – Estimated Water Demand*, provides an estimate of the increase in water demand under Alternative 5. As indicated, Alternative 5 would generate an average increase in water demand of an estimated 110,947 GPD or 124.42 AFY (compared to 195,293 GPD or 215 AFY under the Project).

TABLE 5-16
ALTERNATIVE 5 – ESTIMATED WATER DEMAND

Development Site	Uses	Floor Area/ Units per Use	Wastewater Generation Factor[a]	Water-Wastewater Ratio[a]	Average Water Demand	
					GPD	AFY
2I	Medical Office	50,000 sf	250 gal/ksf	1.5	18,750	21.0
	Health-Related Services, Restaurant, or Neighborhood Commercial	4,500 sf	250 gal/ksf	1.5	1,688	1.9
	Up to four levels of subterranean parking	137,828 sf	20 gal/ksf	1.5	4,136	4.63
2C	Hospital/Health Care, Medical Research, or Health &Wellness Center	112,000 sf	250 gal/ksf	1.5	42,000	47.0
	Health-Related Services, Restaurant, or Neighborhood Commercial	5,500 sf	250 gal/ksf	1.5	2,063	2.3
	Up to four levels of subterranean parking	118,265	20 gal/ksf	1.5	3,548	3.97
S1	Daycare	9,000 sf	120 gal/ksf	1.5	1,620	1.8
	Child and Family Development Center	25,500 sf	120 gal/ksf	1.5	4,590	5.1
	Up to five levels of subterranean parking	303,973 sf (includes S3)	20 gal/ksf	1.5	9,119	10.21
S3	Hospital/Health Care, Medical Research, or Health & Wellness Center	118,000 sf	250 gal/ksf	1.5	44,250	50.0
	Health-Related Services, Restaurant, or Neighborhood Commercial	5,000 sf	250 gal/ksf	1.5	1,875	2.1
	Up to five levels of subterranean parking	(Included in S1)	20 gal/ksf	1.5	-	-
S2	Multi-Family (Replacement) Housing	8,500 sf (10 units)	150 gal/du	1.5	2,250	2.5
	Restaurant or Neighborhood Commercial	800 sf	50 gal/ksf	1.5	60	0.1
	Up to two levels of subterranean parking	23,987 sf	20 gal/ksf	1.5	720	0.81
				TOTAL (GROSS)	136,669	153.42
				EXISTING	**25,722**	**29**
				TOTAL (NET)	**110,947**	**124.42**

Acronyms/Abbreviations: sf = square feet; ksf = 1,000 sf; gal = gallon; gpd = gallons per day; du = dwelling unit

[a] Todd Groundwater, Water Supply Assessment for Providence Saint John's Health Center Phase II Project, July 2018.

SOURCE: ESA, April 2019.

The City's 2015 UWMP analyzes the reliability of the City's water resources to meet water demand for normal, single-dry and multiple-dry year scenarios though 2040. The City's 2040 water supply during these scenarios is projected to be 155 percent, 142 percent, and 150 percent of demand, respectively (7,223 AF, 6,031 AF, and 6,659 AF, respectively. Therefore, the UWMP projects that the City would have adequate water supply to meet its demand, and in fact would have substantially more supply than demand, through at least the 2040 planning horizon of the UWMP. Because the estimated increase in water demand under the Project and Alternative 5 would each represent very small proportions of these surpluses, the City's water supplies would be adequate to meet water demand during normal, dry and multiple dry years under both the Project and Alternative 5. No new or expanded water entitlements would be required, and impacts would be less than significant under both the Project and Alternative 5. As water demand would be less under Alternative 5, the level of impacts under this alternative would be less than under the Project.

The above analysis is conservative because: (1) it assumes that Project water demand is not accounted for in the UWMP's water demand projections, when in fact this demand is most likely included as the projections are based on zoning and both the Project and Alternative 5 would be consistent with zoning; (2) it does not account for reductions in Project water demand associated with the implementation of required water conservation features; and (3) the 2015 UWMP was completed prior to the adoption of the City's Water Neutrality Ordinance such that the City's future water demand would likely be less than that projected in the 2015 UWMP.

Wastewater

Would the Project require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects?

Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Alternative 5 would result in a net increase in development at the Project Site of 247,545 square feet of floor area (exclusive of structured parking), as compared to 571,945 square feet under the Project. This increase in development would generate an increase in wastewater generation requiring conveyance and treatment under both the Project and Alternative 5. **Table 5-17**, *Alternative 5 – Estimated Wastewater Generation*, provides an estimate of wastewater generation under Alternative 5. As indicated, Alternative 5 would generate a net increase in wastewater of an estimated 65,389 GPD (compared to up to 154,158 GPD under the Project).

The Project Site currently served by three existing 12-inch sewer lines, one each in Santa Monica Boulevard, 20th Street, and Broadway. Each of these lines serves a different portion of the Project Site. As indicated in Section 4.19, *Wastewater*, wastewater flows under the Project would not exceed the City's flow threshold (e.g., 50 percent of full capacity) in the 20th Street line, but would exceed this threshold in both the Broadway and Santa Monica Boulevard lines. Adequate wastewater conveyance capacity would be available under the Project and Alternative 5 with: (1) the proposed upsizing of a portion of the Broadway line; and (2) implementation of Mitigation Measure MM-WW-1 with regards to the Santa Monica line.

With regards to wastewater treatment capacity, as indicated in Section 4.19, the HTP has a dry weather capacity of 450 mgd, currently treats 275 mgd, and has a remaining available capacity 175 mgd. The net increase in sewage associated with the Project would be up to approximately 0.09 of the remaining available capacity of the HTP, compared to approximately 0.037 percent under Alternative 5. Because this would represent a minimal increase in the demand for treatment capacity, and because the required treatment capacity is available, no expansion of wastewater treatment capacity would be required under either the Project or Alternative 5.

TABLE 5-17
ALTERNATIVE 5 – ESTIMATED WASTEWATER GENERATION

Development Site	Uses	Floor Area/ Units per Use	Wastewater Generation Factor[a]	Wastewater Generation (GPD)
2I	Medical Office	50,000 sf	250 gal/ksf	12,500
	Health-Related Services, Restaurant, or Neighborhood Commercial	4,500 sf	250 gal/ksf	1,125
	Up to four levels of subterranean parking	137,828 sf	20 gal/ksf	2,757
2C	Hospital/Health Care, Medical Research, or Health &Wellness Center	112,000 sf	250 gal/ksf	28,000
	Health-Related Services, Restaurant, or Neighborhood Commercial	5,500 sf	250 gal/ksf	1,375
	Up to four levels of subterranean parking	118,265	20 gal/ksf	2,365
S1	Daycare	9,000 sf	120 gal/ksf	1,080
	Child and Family Development Center	25,500 sf	120 gal/ksf	3,060
	Up to five levels of subterranean parking	303,973 sf (includes S3)	20 gal/ksf	6,079
S3	Hospital/Health Care, Medical Research, or Health & Wellness Center	118,000 sf	250 gal/ksf	29,500
	Health-Related Services, Restaurant, or Neighborhood Commercial	5,000 sf	250 gal/ksf	1,250
	Up to five levels of subterranean parking	(Included in S1, above)	20 gal/ksf	-
S2	Multi-Family (Replacement) Housing	8,500 sf (10 units)	150 gal/du	1,500
	Restaurant or Neighborhood Commercial	800 sf	50 gal/du	40
	Up to two levels of subterranean parking	23,987 sf	20 gal/ksf	480
			TOTAL (GROSS)	91,111
			EXISTING	**25,722**
			TOTAL (NET)	**65,389**

Acronyms/Abbreviations: sf = square feet; ksf = 1,000 sf; gal = gallon; gpd = gallons per day; du = dwelling unit
[a] Todd Groundwater, Water Supply Assessment for Providence Saint John's Health Center Phase II Project, July 2018.
SOURCE: ESA, April 2019.

The environmental effects of relocation/construction of new on-site wastewater infrastructure for both the Project and Alternative 5 is subsumed in the impact analyses for the other environmental topics evaluated in this EIR (e.g., air quality, noise, etc.). Also, the environmental effects of the construction of the required off-site sewer line improvements would be minimal owing to their limited area of disturbance, their location within the existing street rights-of-way, and implementation of the proposed Construction Traffic Management Program. Therefore, neither the Project or Alternative 5 would require or result in the construction of new wastewater facilities or the expansion of existing facilities, the construction of which would cause significant environmental effects. The impacts of both the Project and Alternative 5 would be less than significant, with the level of impacts similar.

Similar to the Project, Alternative 5 would construct hospital/health care, medical research, medical office, neighborhood commercial, restaurant, and day care uses that would result in a net increase in wastewater flows requiring treatment by the HTP. Wastewater discharges under both the Project and Alternative 5 would be typical of the wastewater already generated at the Phase II Development Sites; it would not include large quantities of any unusual industrial/hazardous discharges (such as sometimes associated with large industrial facilities, oil refineries, etc.) that can sometimes interfere

with the ability of a treatment plant meeting the water quality requirements for its discharges. Furthermore, LARWQCB, in connection with the implementation of the NPDES program, has imposed requirements on the treatment of wastewater, and the wastewater produced by Alternative 5 and the Project would meet these requirements through treatment at the HTP which includes full secondary treatment that reduces wastewater solids by at least 95 percent. Given the above, and because the discharges from the HTP would be required to meet LARWQCB wastewater treatment requirements, Alternative 5, like the Project, would not exceed wastewater treatment requirements of the applicable RWQCB, and the impact would be less than significant. Because Alternative 5 would generate less wastewater than the Project, the level of the impact would be less under this alternative.

Solid Waste

Would the Project generate solid waste in excess of State or local standards or in excess of the capacity of the local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

As indicated in Section 4.20, *Solid Waste,* the Project would generate an estimated 302,027 tons of construction solid waste and 0.93 tons per day of operational solid waste. The construction solid waste would require disposal at the County's only operating inert landfill (Azusa Land Reclamation) or at any of a number of IDEFOs in the County such as the Arcadia Reclamation Facility, while the operational solid waste would require disposal at one or more of the 12 Class III landfills currently serving the City. Because this solid waste would represent only approximately 0.54 percent and 0.002 percent, respectively, of the remaining construction and operational solid waste disposal capacity at these facilities, sufficient permitted solid waste disposal capacity is available to serve the Project and impacts would be less than significant. Alternative 5 would include less development than the Project, and therefore generate less construction and operational solid waste. Therefore, impacts would also be less than significant under Alternative 5, with the level of the impacts less than under the Project.

Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Both the Project and Alternative 5 would be implemented in compliance with applicable federal, state, and local statutes and regulations related to solid waste. In accordance with SMMC Section 8.108.010, the Applicant would submit a WMP for C&D waste meeting City requirements as part of the application packet for demolition permits and construction will achieve at least a 70 percent solid waste diversion rate. With regard to waste generated during operation, both the Project and Alternative 5 would provide refuse and recycling bins to accommodate the solid waste streams generated by the proposed uses, and would house these bins in enclosed refuse areas in compliance with SMMC Section 9.21.130 (Resource Recovery and Recycling Standards). In accordance with Assembly Bill 1826, separate recycling bins for organic waste would be provided, and arrangements would be made for organic waste recycling services. Therefore, the impacts of the Project and Alternative 5 would be less than significant, with the level of the impacts generally similar between the Project and Alternative 5.

5.6.5.3 Relationship of the Alternative to the Project Objectives

Under Alternative 5, total development on the Saint John's Campus would be reduced as compared to the Project's full buildout of the Master Plan. Specifically, no development at Sites 2D/E, S4, or S5 would occur and existing uses would remain as they are on these sites. Under Alternative 5, Sites 2I, 2C, S1, S3, and S2 would be redeveloped with the same programming as the Master Plan. The building location, uses, and building setbacks are assumed to be generally the same as the Project. In addition, Alternative 5 assumes the same proposed street network as the Master Plan, including new streets such as 20th Place and Saint John's Way and vacation of the northern portion of 21st Street. Furthermore, the west tunnel connection and the above-grade pedestrian connection over Santa Monica Boulevard would be constructed. Similar to the Project, this alternative would also require relocation of existing utilities.

Alternative 5 would partially meet most of the Project objectives. It would partially meet Objective 1 – Health Care and Related Uses and Facilities, by providing some new medical facilities that contribute to PSJHC functioning as part of an integrated health services delivery system that provides a range of care for Santa Monica and surrounding communities. It would partially meet Objective 2 – Required Uses and Facilities, but providing child care in accordance with the DA. It would partially meet Objective 3 – Phase II Master Plan Development Program, by developing a comprehensive Master Plan for a portion of Phase II of the PSJHC Campus and a Development Program that are designed to achieve the other Project objectives, accommodate the uses vested by the DA, integrate the campus, ensure that acute care, outpatient treatment and related services are situated near each other, and ensure that PSJHC remains in continuous operation as a hospital and health care facility during development. It would partially meet Objective 4 – Mobility and Circulation, by developing and implementing a comprehensive circulation plan on a portion of the Phase II Development Sites for vehicles, bicycles and pedestrians and providing connections between buildings via these modes of travel, and providing a pedestrian and bicycle-friendly campus. It would partially meet Objectives 5 – Parking, and 6 – Minimizing VMT, by providing sufficient parking to meet PSJHC peak parking demand, implementing a TDM program, and providing a complimentary mix of land uses. It would meet Objective 7 – Minimize Phase II Impacts, by ensuring that the Phase II Phasing Plan and schedule minimize impacts on PSJHC neighbors and existing uses to the extent reasonably feasible.

However, with the exception of Objective 7, important elements of the Project objectives would not be met or would not be fully achieved than under the Project. Alternative 5 would not: (1) provide the range and/or extent of medical services to be provided under the Project since there would be no Education and Conference Center, East Ambulatory Care and Research Building, visitor housing, or East Ambulatory & Acute Care Building (Objective 1); (2) provide replacement housing (Objective 2); (3) accommodate all the Phase II development vested by the DA or provide 35 percent of the Project Site as open space (Objective 3); (4) provide a comprehensive circulation plan for vehicles, bicycles and pedestrians that integrates the PSJHC Campus (Objective 4); or (5) reduce VMT to the same extent of the Project since there would be less density of uses in close proximity to transit (Objective 5). It would be more effective than the Project in minimizing impacts on PSJHC neighbors (Objective 7) due to less development and thus less construction and operational activities and vehicle trips.

Overall, Alternative 5 would be less effective than the Project in meeting the Project objectives.

5.7 Environmentally Superior Alternative

Section 15126.6(e)(2) of the State *CEQA Guidelines* indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

With respect to identifying an Environmentally Superior Alternative among those analyzed in this EIR, the range of feasible Alternatives includes: Alternative 1 – No Project/No Build Alternative; Alternative 2 – Tier 1 Only; Alternative 3 – Reduced Healthcare Uses with Tier 2 Housing on South Campus; Alternative 4 – Reduced Master Plan; and Alternative 5 – Partial Master Plan. A comparative summary of the environmental impacts of the Project and of each of the alternatives is provided in **Table 5-18,** *Comparison of Impacts of the Project and Alternatives.* As indicated therein, Alternative 1 would have less impacts than the Project and the other alternatives as it would have no impacts on the environment. However, Alternative 1 would not meet any of the Project objectives, nor would it provide the community benefits associated with the Project. Furthermore, in accordance with CEQA, because Alternative 1 (the "no project" alternative) would be the environmentally superior alternative, this EIR identifies another environmentally superior alternative from among the remaining alternatives.

The remaining Alternatives were reviewed in accordance with the State *CEQA Guidelines* requirement to identify an environmentally superior Alternative other than the Alternative 1 (No Project/No). As indicated in Table 5-18, of the remaining alternatives, Alternatives 2, 4 and 5 would all have less impacts than the Project, owing primarily to the lesser amount of development under these alternatives. Alternative 3 would have greater impacts than the Project, owing primarily to both the greater amount of development under this alternative and the greater number of residential uses which are more impactful than health care uses for a number of environmental issue areas.

Alternatives 4 and 5 would be the least impactful, each resulting in less impacts than the Project in 15 environmental issue areas, similar impacts in four, and greater impacts in two. Alternative 5 would include less development than Alternative 4, such that the level of most of the impacts would be less under Alternative 5. In addition, Alternative 5 would avoid the significant unavoidable historical resources impacts to the John Wayne Cancer Institute building that would occur under the Project and Alternatives 2 and 3, and 5, and would result in significant unavoidable operational level of service impacts to fewer intersections and street segments than these other alternatives. Therefore, Alternative 5 (Partial Master Plan) is identified as the environmentally superior alternative.

TABLE 5-18
COMPARISON OF IMPACTS OF THE PROJECT AND ALTERNATIVES

Environmental Issue	Proposed Project	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Aesthetics	LTS	Less (NI[a])	Similar (LTS[a])	Similar (LTS[a])	Similar (LTS[a])	Similar (LTS[a])
Air Quality	SU	Less (NI)	Less (SU)	Greater (SU)	Less (SU)	Less (SU)
Construction Effects	LTS	Less (NI)	Less (LTS)	Greater (LTS)	Less (LTS)	Less (LTS)
Historical Resources	SU	Less (NI)	Similar (SU)	Similar (SU)	Similar (SU)	Less (SU)
Archaeological Resources	LTS	Less (NI)	Less (LTS)	Greater (LTS)	Less (LTS)	Less (LTS)
Energy	LTS	Less (NI)	Less (LTS)	Greater (LTS)	Less (LTS)	Less (LTS)
Geology and Soils	LTS	Less (NI)	Similar (LTS)	Similar (LTS)	Similar (LTS)	Similar (LTS)
Greenhouse Gas Emissions	LTS	Less (NI)	Less (LTS)	Greater (LTS)	Less (LTS)	Less (LTS)
Hazards and Hazardous Materials	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
Hydrology and Water Quality	LTS	Less (NI)	Greater (LTS)	Greater (LTS)	Less (LTS)	Similar (LTS)
Land Use and Planning	LTS	Less (NI)	Greater (LTS)	Greater (LTS)	Greater (LTS)	Greater (LTS)
Neighborhood Effects	SU	Less (NI)	Less (SU)	Greater (SU)	Less (SU)	Less (SU)
Noise and Vibration	SU[b]	Less (NI)	Less (SU[b])	Greater (SU[b])	Less (SU[b])	Less (SU[b])
Population and Housing	LTS	Less (NI)	Similar (LTS)	Greater (LTS)	Similar (LTS)	Similar (LTS)
Police Protection	LTS	Less (NI)	Less (LTS)	Greater (LTS)	Less (LTS)	Less (LTS)
Fire Protection	LTS	Less (NI)	Less (LTS)	Greater (LTS)	Less (LTS)	Less (LTS)
Transportation	SU	Less (NI)	Less (SU)	Greater (SU)	Less (SU)	Less (SU)
Tribal Cultural Resources	NI	Similar (NI)	Similar (NI)	Similar (NI)	Similar (NI)	Similar (NI)
Water Supply	LTS	Less (NI)	Less (LTS)	Greater (LTS)	Less (LTS)	Less (LTS)
Wastewater	LTS	Similar (NI)	Less (LTS)	Greater (LTS)	Less (LTS)	Less (LTS)
Solid Waste	LTS	Less (NI)	Less (LTS)	Greater (LTS)	Less (LTS)	Less (LTS)
Total	--	**Less = 19** **Similar = 2** **Greater = 0**	**Less = 14** **Similar = 5** **Greater = 2**	**Less = 1** **Similar = 4** **Greater = 16**	**Less = 15** **Similar = 5** **Greater = 1**	**Less = 15** **Similar = 4** **Greater = 2**

Acronyms and Abbreviations: NI = no impact, LTS = less than significant impact or less than significant impact after mitigation, SU = significant unavoidable impact

[a] In accordance with PRC Section 21099(d)(2)(A0, a significance determination applies only to consistency with zoning and regulations governing scenic quality.

[b] Construction and operational noise, operational vibration, and most construction vibration would be less than significant after mitigation. However, some construction vibration impacts (those on adjacent vibration-sensitive medical uses not owned by Saint John's who choose not to participate in MM-NOISE-2) could be significant unavoidable.

SOURCE: ESA, 2019.

However, Alternative 5 (as well as Alternatives 2 and 4) would not meet all the Project objectives. In particular, Alternative 5 would not: (1) provide the range and/or extent of medical services to be provided under the Project due to its reduced amount of floor area (Objective 1); (2) provide replacement housing (Objective 2); (3) accommodate all the Phase II development vested by the DA or provide 35 percent of the Project Site as open space (Objective 3); (4) provide a comprehensive circulation plan on the entirety of the Phase II Development Sites (Objective 4); or (5) reduce VMT to the same extent of the Project due to lower-density development than the Project in close proximity to transit (Objective 5). It would also not be as effective as the Project in meeting the balance of the Project objectives. Further, while Alternative 5 would result in direct reductions in impacts to the environment, it would have greater impacts than the Project and Alternatives 2, 3 and 4 in terms of a lack of support for applicable City goals and policies that are intended to support the continued operation of PSJHC, accommodate future growth, and promote sustainable development patterns to reduce VMT. The Project, as proposed, would better achieve these City goals and policies, and would provide a higher level of community benefits.

CHAPTER 6
Other CEQA Considerations

This chapter addresses environmental topics required by CEQA that are not covered within the other chapters of this EIR, including: (1) effects found not to be significant; (2) significant unavoidable impacts; (3) reasons the Project is being proposed notwithstanding its significant unavoidable impacts; (4) growth inducing impacts; (5) significant irreversible environmental changes; and (6) potential secondary effects.

6.1 Effects Found Not to Be Significant

The City determined the that the proposed Project has the potential to cause or result in significant environmental impacts that warranted further analysis, public review, and disclosure through the preparation of an EIR. In accordance with California Environmental Quality Act (CEQA) Guidelines (*State CEQA Guidelines*) Section 15063(a), the City determined that an EIR is clearly required for the Project, and thus proceeded directly to preparing an EIR rather than preparing an initial study first to determine whether an EIR is required.

As required by *State CEQA Guidelines* Section 15128, an EIR shall contain a brief discussion stating the reasons why various possible significant effects of a project were determined not to be significant and therefore are not discussed in detail in the EIR. In accordance with this requirement, and because an initial study was not prepared for the Project, provided below is a brief discussion of each of these topics for the Project in the form of answers to the *CEQA Guidelines* Appendix G Checklist questions for these topics.

6.1.1 Agricultural and Forest Resources

a) Would the project 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 currently fully developed with urban uses, and does not contain designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant the Farmland Mapping and Monitoring Program, nor is such farmland located adjacent to or within the general vicinity of the Project Site.[1] Therefore, the Project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, and no impact would occur.

[1] California Department of Conservation Division of Land Resource Protection, 2016, Los Angeles County Important Farmland 2016 (Map), ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf, accessed March 20, 2019.

b) Would project conflict with existing zoning for agricultural use, or a Williamson Act contract? [No Impact]

The Project Site is currently fully developed with urban uses, is zoned for urban development (e.g., Healthcare Mixed-Use [HMU] and Mixed-Use Boulevard Low [MUBL]), and is not under a Williamson Act contracts.[2] In addition, land uses at the Project Site are regulated by the 1998 PSJHC Master Plan and associated DA, and amendments thereto, which plan for redeveloping the Project Site with new medical uses. Furthermore, the Project Site is an urban infill site surrounded on all sides by urban development. Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract, and no impact would occur.

c) Would the project conflict with existing zoning for, or cause rezoning of, forestland (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]

d) Would the Project result in the loss of forestland or conversion of forestland to non-forest uses? [No Impact]

e) Would the project 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 forestland to non-forest use? [No Impact]

As indicated above, the Project Site is currently fully developed with urban uses and zoned for urban development (e.g., HMU and MUBL), with land uses at the Project Site regulated by the 1998 PSJHC Master Plan and Associated DA that plan for redeveloping the site with new medical uses. No Farmland, forestland, timberland, or land zoned for timberland production occurs at the Project Site. As further indicated above, the Project Site is an urban infill site surrounded on all sides by urban development. Therefore, the Project would not: (1) conflict with existing zoning for, or cause rezoning of, forestland, timberland, or land zoned for timberland production: (2) result in the loss of forestland or conversion of forestland to non-forest uses; or (3) involve other changes that could result in conversion of Farmland to non-agricultural use or forestland to non-forest use. No impact would occur.

6.1.2 Biological Resources

a) Would the Project 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]

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? [No Impact]

[2] California Department of Conservation, State of California Williamson Act Contract Land (Map), 2017, ftp://ftp.consrv.ca.gov/pub/dlrp/wa/2016%20Statewide%20Map/WA_2016_11X17.pdf, accessed March 20, 2019.

The Project Site is an urban infill site that is currently fully developed with urban uses and surrounded on all sides by urban development. No waterways riparian habitat occur on the Project Site (see discussion under "c" below), and the Project Site is located on relatively flat land and well away from the Pacific Ocean, Santa Monica Mountains, and other natural open space areas. Furthermore, no native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors occur on or within the vicinity of the Project Site.

Due to the urbanized nature of the Project Site and surrounding area, the Project Site does not support habitat for candidate, sensitive, or special status species, beyond potential tree habitat for nesting birds, as it has been heavily disturbed and developed. The potential exists for migratory bird species protected under the Migratory Bird Treaty Act (MBTA) to be nesting in trees that may be removed during Project construction. Migratory birds that are common to the area include the northern mockingbird (*Mimus polyglottos*), Anna's hummingbird (*Calypte anna*), house finch (*Carpodacus mexicanus*), and the snowy plover (*Charadrius alexandrinus*).[3] Anecdotal information indicates that hawks and falcons forage in urban areas for avian prey species at backyard feeders and parks, but nest in native areas outside the City (such as the Santa Monica Mountains).[4] However, the Project would comply with the MBTA to avoid disturbance of nesting birds and to protect nesting birds if they are present on-site during construction. Furthermore, based on a literature review and a review of the California Natural Diversity Database (CNDDB), and because the City is fully developed with urban uses and has little undisturbed native vegetation, the diversity of native terrestrial animal species is very low, with such species likely to be dominated by common native and non-native species typical of coastal urban environments in the Los Angeles Basin.[5] In addition, the potential for overland wildlife movement (excluding birds) through the majority of the City is highly restricted due to the highly urbanized nature of the City, and although some local movement of wildlife could occur, most wildlife species are likely to use the Santa Monica Mountains as a wildlife movement area.[6] Lastly, while a review of the CNDDB and California Native Plant Society (CNPS) literature indicates that 12 special-status plant species have some potential to occur in the City, non-native vegetation is virtually absent from the City, and these 12 species are either assumed absent due to a lack of suitable habitat or have a low potential to occur due to the lack of recent extant recorded occurrences in the City.[7]

For all these reasons identified above, the Project would not result in a substantial adverse effects on any sensitive species, would not interfere substantially with the movement of any native resident or migratory species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Impacts would be less than significant.

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3 City of Santa Monica, City of Santa Monica Land Use and Circulation Element Final EIR, Volume 1, SCH No. 2009041117, p.4.3-3, April 2010.

4 City of Santa Monica, City of Santa Monica Land Use and Circulation Element Final EIR, Volume 1, SCH No. 2009041117, p.4.3-3, April 2010.

5 City of Santa Monica, City of Santa Monica Land Use and Circulation Element Final EIR, Volume 1, SCH No. 2009041117, p.4.3-3, April 2010.

6 City of Santa Monica, City of Santa Monica Land Use and Circulation Element Final EIR, Volume 1, SCH No. 2009041117, p.4.3-3, April 2010.

7 City of Santa Monica, City of Santa Monica Land Use and Circulation Element Final EIR, Volume 1, SCH No. 2009041117, p.4.3-3 and -4, April 2010.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? [No Impact]

As discussed above, the Project Site is fully urbanized, represents an urban infill site, and is surrounded on all sides by urban development. No riparian habitat or designated sensitive natural communities exist on the Project Site or in the surrounding area. Furthermore, the Project Site is not bisected by streams and does not contain surface water bodies (see discussion under "c" below). Due to the developed nature of the Project Site and its surroundings, the Project Site does not contain a native or natural community. Therefore, the proposed Project would have no impact to riparian habitat or sensitive natural communities.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? [No Impact]

Drainage courses with definable bed and bank and their adjacent wetlands are considered "waters of the United States" and fall under the jurisdiction of the U.S. Army Corps of Engineers (USACE) in accordance with Section 404 of the Clean Water Act. Jurisdictional wetlands, as defined by USACE, are lands that during normal conditions possess hydric soils, are dominated by wetland vegetation, and are inundated with water for a portion of the growing season.[8]

The Project Site is entirely developed with, and is totally surrounded by, urban uses. No blue line streams bisect, or occur within the immediate vicinity of, the Project Site.[9] Furthermore, the Project Site does not contain any discernable drainage courses, inundated areas, wetland vegetation, or hydric soils, and thus does not include USACE jurisdictional drainages or wetlands. Therefore, the Project would have no impact to federally protected wetlands, and no impact would occur.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? [Less Than Significant]

f) Would the project 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 an urban infill site currently fully developed with and surrounded by urban uses, and no protected biological resources or habitat exist on or within the vicinity of the Project Site. Furthermore, no Habitat Conservation Plan HCP) or Natural Community Conservation Plan (NCCP) applies to the Project Site. Lastly, the Project would require the removal of approximately 16 public street trees protected under SMMC Section 7.40. However, restitution in the form of replacement street trees or monetary contribution to the planting of new street trees would be

[8] United States Environmental Protection Agency (USEPA), Section 404 of the Clean Water Act: How Wetlands Are Defined and Identified, 2019, https://www.epa.gov/cwa-404/section-404-clean-water-act-how-wetlands-are-defined-and-identified, accessed March 21, 2019.

[9] City of Santa Monica, GIS Data Portal, ArcGIS System, https://www.arcgis.com/home/webmap/viewer.html?panel=gallery&suggestField=true&url=https%3A%2F%2Fcsmgisweb.smgov.net%2Fcsmgis01%2Frest%2Fservices%2Fenvironment%2Fcontours%2FMapServer%2F0, accessed March 21, 2019.

required by the City's Urban Forester. Therefore, the Project would not conflict with applicable local policies or ordinances protecting biological sources, or with an applicable HCP or NCCP, and impacts would be less than significant.

6.1.3 Mineral Resources

a) Would the project 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]

b) Would the project 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]

The Project Site is an urban infill site currently fully developed with and surrounded by urban uses, and no mineral extraction activities currently occur on or within the vicinity of the Project Site. The Project Site is also not designated as an existing Aggregate Production Area by the State of California or the U.S. Geological Survey.[10] Therefore, the Project would not 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, or of a locally important mineral resource recovery site. No impact would occur.

6.1.4 Utilities (Electric Power, Natural Gas and Telecommunications Facilities)

a) Would the project require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects? [Less Than Significant]

The Project Site is currently fully developed with urban uses, is surrounded on all sides by urban development, and is currently served by electric power, natural gas and telecommunication lines in the adjacent streets. The Project would require the construction or relocation of electric, natural gas and/or telecommunications infrastructure on the Project Site, new connections from this infrastructure to the existing electric, natural gas and telecommunications lines in the adjacent streets, and upsizing of small segments of two off-site natural gas lines.[11,12] Construction impacts associated with the installation of these improvements would primarily involve minor trenching in order to place new or relocated lines below the surface and connections to the existing off-site lines. However, the environmental effects associated with the on-site portion of improvements is already subsumed in the environmental analysis for the proposed Project in Chapter 4 of this EIR. Also, any air emissions, noise and traffic disruptions associated with construction of new or relocated lines and connections would be minor, temporary, largely restricted to the Project Site and the adjacent street rights-of-way. Furthermore, construction activities would occur in accordance with

[10] California Geological Survey, Aggregate Sustainability in California, 2018, https://www.conservation.ca.gov/cgs/Documents/Publications/MS_52_California_Aggregates_Map_201807.pdf, accessed March 21, 2019.

[11] For example, there are existing electrical lines in Santa Monica Boulevard and Broadway fronting the Project Site, as well as electrical lines bisecting the Project Site, and the Project would relocate a portion of one of the bisecting lines from 21st Street to 20th Place and the South Campus West Driveway. The Project would also underground the relocated line as well as the remaining segment of the 21st Street line.

[12] For example, there are existing natural gas lines in Santa Monica Boulevard, Broadway, and 23rd Street fronting the Project Site, as well as natural gas lines bisecting the Project Site, and the Project would potentially upsize portions of two of the Broadway lines and would remove a portion of the 21st Street line.

applicable air quality and noise regulations (e.g., SCAQMD Rule 403 fugitive dust requirements, SMMC Section 4.12.110 restricting construction activities to daylight hours, etc.) that have been formulated to avoid significant construction-related air emissions and noise. Lastly, while construction/relocation of these improvements could potentially result in minor traffic and circulation disruptions during the construction period, implementation of the proposed Construction Traffic Management Plan (PDF-TRAF-1) would ensure that any such traffic and circulation disruption are less than significant. Therefore, the Project would not require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects, and the impacts would be less than significant. See Sections 4.10, 4.19 and 4.20 of this EIR for analysis of the Project's environmental effects associated with storm drainage, water, and wastewater infrastructure, respectively.

6.1.5 Wildlfire

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

a) Substantially impair an adopted emergency response plan or emergency evacuation plan? [No Impact]

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? [No Impact]

c) Require the installation or maintenance of associated infreastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary ongoing impacts to the environment? [No Impact]

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? [No Impact]

As indicated previously, the Project Site is currently fully developed with urban uses, is an urban infill site surrounded on all sides by urban development, is on relatively flat land, and is located well away from the Santa Monica Mountains and other natural open space areas. The Project site is not located in or near a state responsibility area.[13] The Project Site is also not located in or near a very high fire hazard severity zone.[14] Therefore, no wildfire impacts would occur.

[13] Cal Fire, Fire Hazard Severity Zones in SRA – Los Angeles County, adopted November 7, 2017, http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf, accessed March 21, 2019.

[14] Cal Fire, Fire Hazard Severity Zones in SRA – Los Angeles County, adopted November 7, 2017, http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf, accessed March 21, 2019.

6.2 Significant Unavoidable Impacts

CEQA Guidelines Section 15126 requires that an EIR describe any significant impacts that cannot be avoided, even with implementation of feasible mitigation measures. As indicated in Chapter 4, *Environmental Impact Analysis*, of this EIR, the Project would result in significant unavoidable impacts in terms of air quality, construction effects, cultural resources - historical resources, neighborhood effects, noise and vibration (vibration), and transportation. Each of these impacts is summarized below.

6.2.1 Air Quality

As indicated in Section 4.2, *Air Quality*, of this EIR, Project Interim Year (2031) operational nitrogen oxides (NO_x) emissions would be reduced with implementation of the proposed mitigation measure (e.g., MM-AIR-1), but would still exceed SCAQMD regional operational thresholds. Therefore, operational NO_x emissions would be significant and unavoidable. However, it should be noted that if the SCAQMD regional construction thresholds were applied, total Project construction and operational emissions would be below all thresholds.

6.2.2 Construction Effects

As indicated in Section 4.3, *Construction Effects*, of this EIR, Project construction activities could result in significant unavoidable vibration impacts. See Subsection 6.2.5, Noise and Vibration, below for further discussion.

6.2.3 Cultural Resources - Historical Resources

As indicated in Section 4.4, *Cultural Resources - Historical Resources*, of this EIR, the Project would result in significant unavoidable impacts to historical resources due to demolition of the Cancer John Wayne Cancer Institute Building (JWCI) and Lt. Joseph P. Kennedy Jr. Memorial Child & Family Development Center (CFDC). Implementation of proposed mitigation measures (e.g., MM-HIST-1 through -3) would address impacts, but as there is no feasible mitigation to reduce the effects of demolition of these historical resources to a less than significant level, the impact would remain significant and unavoidable.

6.2.4 Neighborhood Effects

As indicated in Section 4.12, *Neighborhood Effects*, of this EIR, no mitigation is available for the significant neighborhood effects of the Project in terms of one of the traffic issues analyzed (e.g., operational intersection and street segment LOS, see discussion below). Therefore, Project operational traffic-related neighborhood effects would be significant and unavoidable.

6.2.5 Noise and Vibration

As indicated in Section 4.13, *Noise and Vibration*, of this EIR, Mitigation Measure MM-NOISE-2 would prevent vibration impacts to vibration sensitive medical equipment at Medical Office Buildings not owned/controlled by Providence Saint John's that participate in MM-NOISE-2 through location inventory, simulation testing, equipment relocation, equipment isolation, not conducting construction during active use of equipment, or alternative construction methods. Thus,

potentially significant construction vibration impacts at participating Medical Office Buildings not owned/controlled by Saint John's would be reduced to a less than significant level. However, for any Medical Office Buildings not owned/controlled by Saint John's that do not participate in MM-NOISE-2, Project construction vibration could result impacts to vibration sensitive medical equipment. Therefore, the impact would be significant and unavoidable.

6.2.6 Transportation

As indicated in Section 4.17, *Transportation*, of this EIR, Project intersection and street segment operations impacts would be significant and unavoidable at the following study intersections and roadway segments under Interim Year (2031) and/or Future Year (2042) conditions. The impacts at these intersections would be significant and unavoidable as feasible mitigation is not available to reduce the impacts at these intersections to less than significant levels due to lack of additional adequate right-of-way area, inconsistency with adopted City policies, and/or because they would result substantial secondary impacts. See Section 4.17 for further discussion.

Intersections*

26. 20th Street & Arizona Avenue
33. 20th Street & Pico Boulevard
42. 23rd Street & Arizona Avenue
44. 23rd Street & Broadway
50. Cloverfield Boulevard & Olympic Boulevard
53. Cloverfield Boulevard & I-10 Eastbound On-Ramp
70. Centinela Avenue & Santa Monica Boulevard**
74. Centinela Avenue & I-10 Westbound On-Off Ramps
77. Bundy Drive & Santa Monica Boulevard**
79. Bundy Drive & Olympic Boulevard[15]
80. Bundy Drive & Ocean Park Boulevard
81. Bundy Drive & I-10 Eastbound On-Ramp**
82. Barrington Avenue & Wilshire Boulevard
83. Barrington Avenue & Santa Monica Boulevard

* These are Project and cumulative impacts.

** If appropriate approvals are granted by the City of Los Angeles (and by Caltrans in the case of Intersection 81) in conjunction with the mitigation measures identified in Section 4.17 for Intersections 70, 77, and 81, Project impacts at these intersections would be mitigated to less than significant levels.

[15] The mitigation for Intersection 79 identified in Section 4.17 of this EIR would reduce the Project's significant operational level of service impact at this intersection, but not to less than significant levels.

Street Segments*

1. Arizona Avenue west of 17th Street
2. Arizona Avenue west of 20th Street
9. 23rd Street north of Wilshire Boulevard
10. 23rd Street north of Arizona Avenue
11. 23rd Street north of Santa Monica Boulevard
14. 23rd Street south of Ocean Park Boulevard

* These are both Project and cumulative impacts.

6.3 Reasons the Project is Being Proposed, Notwithstanding its Significant Unavoidable Impacts

In addition to identification of the Project's significant unavoidable impacts, Section 15126 of the State CEQA Guidelines requires an EIR to identify the reasons why a project is being proposed, notwithstanding its significant unavoidable impacts. The Project is being proposed, notwithstanding its significant unavoidable impacts, in order to implement Phase II of the PSJHC Master Plan and associated DA approved by the City in 1998. Phase I of the Master Plan was completed in 2014. The approved DA's provisions for Phase II establish vested rights for up to 799,000 square feet of development on the North and South Campuses. In addition, the DA provides vesting protections Phase II uses. Phase II vested uses include various hospital and health care uses, health and wellness uses, education and conference facilities, visitor housing, replacement multifamily housing units, and parking. See Chapter 2, *Project Description*, of this EIR for further discussion.

The Project is also being proposed, notwithstanding its significant unavoidable impacts, in order to implement the second amendment to the DA approved by the City in 2017. The second amendment: (1) changed the South Campus Master Plan to a Phase II Master Plan encompassing all of the Phase II Project Site on both the North and South Campuses; (2) changed the DA to require approval of the Phase II Master Plan prior to approval of the individual DRPs for Phase II Project buildings; (3) established the City Council as the decision-making body for the Phase II Master Plan; and (4) required that all Phase II development be consistent with the approved Phase II Master Plan. See Chapter 3 of this EIR for further discussion.

The Project is also being proposed, notwithstanding its significant unavoidable impacts, in order to achieve the following objectives for the Project shared by the City and Project Applicant. See Chapter 2 of this EIR for a full listing of the Project objectives.

> ***Objective 1: Health Care and Related Uses and Facilities*** – Ensure that PSJHC will function as part of an integrated health services delivery system that provides a range of care for Santa Monica and surrounding communities including acute care, outpatient (ambulatory) treatment, health and medical research, illness and disease prevention, community health education, and patient and family supportive services.

Objective 3: Phase II Master Plan and Development Program – Develop a comprehensive Master Plan for Phase II of the PSJHC Campus (Phase II Master Plan) and a Development Program that are designed to achieve the following objectives:

- Vested Uses and Vested Floor Area – Accommodates PSJHC Vested Uses and Vested Floor Area as provided in the DA.
- Location of Uses – Ensure that acute care, outpatient treatment and related services are situated in close proximity to each other in order to maximize efficiency, provide convenient patient access to needed and assistive services, and control costs.
- Open Space – Preserve and expands open space on PSJHC Campus in accordance with the DA requirement of 35% open space on the South Campus.
- Uninterrupted Health Care Services – Ensures that PSJHC remains in continuous operation as a hospital and health care facility during development of the Phase II facilities.

Objective 4: Mobility and Circulation – The Project has the following Mobility and Circulation objectives:

- Develop and implement a comprehensive circulation plan for vehicles, bicycles and pedestrians that integrates PSJHC Campus circulation with circulation in the surrounding area.
- Provide effective and convenient connections for all transportation users (vehicles, bicycles, and pedestrians) between the uses and buildings constructed under Phase I and proposed under the Phase II Project.
- Create a vibrant pedestrian environment and protect residents on 21st Street from cut-through vehicular traffic by converting a portion of 21st Street to a "living street" that is dedicated to pedestrians while maintaining emergency vehicle access.
- Create a bicycle-friendly Campus by providing convenient access to/from the Campus, including connections to the existing bicycle lanes in the surrounding area, and dispersing bicycle parking throughout the Campus.

Objective 6: Minimize Vehicle Miles Traveled – Minimize vehicle miles traveled by implementing a comprehensive Transportation Demand Management (TDM) program.

6.4 Growth-Inducing Impacts

CEQA Guidelines Section 15126.2 (d) requires a discussion of the proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. Under CEQA, growth is not to be considered necessarily detrimental, beneficial, or of significant consequence. Induced growth is considered a significant impact only if it can be demonstrated that the potential growth, in some other way, significantly affects the environment.

In general, a project may foster physical, economic, or population growth in a geographic area if it meets any one of the criteria identified below:

- The project results in the urbanization of land in a remote location (leapfrog development);

- The project removes an impediment to growth (e.g., the establishment of an essential public service, or the provision of new access to an area);
- The project establishes a precedent-setting action that could lead to physical adverse changes in the environment (e.g., a change in zoning or general plan amendment approval);
- Economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.).

The Project would demolish the existing medical buildings, a vacant 10-unit apartment building, and surface parking, and develop in their place medical buildings and 30-34 visitor housing units as part of the proposed medical buildings, 10 replacement apartment units, structured parking, and enhanced vehicular and pedestrian circulation connections. As detailed in Chapter 2*, Project Description*, of this EIR, the Project would include the demolition of approximately 110,055 sf of existing building floor area and the development of approximately 682,700 sf of new building floor area, for a net increase in building floor area of approximately 572,645 sf. In addition: (1) two of the 10 replacement housing units would be affordable units as required by Section 3.14.1(b) of the 1998 PSJHC DA; (2) it is assumed that the 177 existing employees at the Phase II Development Sites would continue to work at the Project Site under the proposed Project; and (3) the visitor housing would be restricted to overnight visitations by PSJHC inpatients and outpatients, visiting health care professions, and participants in health care conferences and seminars at the PSJHC Campus, as required by Section 3.3.1(s) of the DA.

The Projects would develop new medical uses and replacement and visitor housing, and create new jobs, that would result in a net increase in employment in the City and region and an indirect demand for housing. These increases would be consistent with the growth projected in the City's LUCE and SCAG's 2016-2040 RCP/SCS, and would be consistent with the Phase II development vested at the Project Site by the PSJHC Master Plan and DA approved by the City in 1998. Furthermore, while the Project would exacerbate the existing jobs-rich and housing-poor imbalance in both the City and County, the Project's net increase in employees would represent a small percentage of the total increase in employment projected for the County by the RTP/SCS between 2016 and 2040 (as interpolated to 2041) and has already been accounted for in the LUCE. Lastly, the Project would be located on an already developed urban infill site within an area that is highly urbanized and substantially built out area, and would not include new roads or utility infrastructure that would open new areas to development. Therefore, the Project would not foster substantial unplanned population or economic growth in the City, and growth-inducement impacts would be less than significant. See Section 4.11, *Population and Housing*, of this EIR for further discussion.

6.5 Significant Irreversible Environmental Changes

According to Sections 15126 of the State CEQA Guidelines, an EIR is required to address any significant irreversible environmental changes that would occur should a proposed project be implemented. As stated in CEQA Guidelines Section 15126.2(c):

> *Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely. Primary impacts and, particularly, secondary*

> *impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

Project construction would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the Project Site. Project construction would require the consumption of resources that are non-replenishable or may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Furthermore, nonrenewable fossil fuels such as gasoline and oil would also be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from the Project Site. However, the Project's consumption of energy during construction would be temporary, and would occur in accordance with applicable regulations (e.g., Title 13 CCR anti-idling regulations, etc.). Therefore, Project construction activities would not result in the wasteful, inefficient, or unnecessary consumption of nonrenewable resources.

Project operation would continue to directly expend nonrenewable resources that are currently consumed within the City. These include energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the Project, and the existing, finite supplies of these natural resources would be incrementally reduced. The Project would also comply with applicable energy and water conservation requirements (e.g., Title 24, Building Energy Efficiency standards, CalGreen, City of Santa Monica Green Building Code, etc.), and would include sustainable design features required to meet LEED Silver certification and improve energy and water efficiency beyond regulatory requirements.[16] Furthermore, the urban infill nature of the Project Site and the Project's land use characteristics (such as proximity to transit and mixed-use development) would provide an efficient land use pattern that promotes reduction in vehicle miles traveled. Additionally an enhanced transportation demand management (TDM) program that would be negotiated between the City and Providence Saint John's would be implemented throughout the life of the Project that would reduce both motor vehicle trips and vehicle miles travelled. The Project would also not induce substantial indirect consumption of nonrenewable resources, including energy, water and land resources, in that it would represent the redevelopment of an already developed urban infill site, would not extend roads or utility infrastructure to unserved areas, and would not otherwise facilitate the development of currently undeveloped areas. Lastly, the Project would be consistent with regional growth projections in SCAG's 2016 RTP/SCS, and would not conflict with sustainability goals established

[16] Proposed sustainable design features include, but are not limited to; reducing indoor potable water use by a minimum of 40 percent, and outdoor potable water use by a minimum of 50 percent, as compared to baseline water consumption, through use of water efficient fixtures and landscaping; use of electricity from renewable energy sources (e.g., green power); use of solar electric PV systems; provision of electric vehicle charging stations; provision of pedestrian and bicycle improvements; and provision of HVAC systems that would meet or exceed energy efficiency requirements, and use of LED lighting.

in the City's LUCE, Sustainable City Plan, and Climate Action and Adaptation Plan. Therefore, Project operation would not result in the direct or indirect wasteful, inefficient, or unnecessary consumption of nonrenewable resources, would not induce substantial growth, and would not commit future generations to uses that do not already exist at the Project Site. See Sections 4.2, *Air Quality*, 4.6, *Energy*, 4.8, *Greenhouse Gas Emissions*, 4.11, *Land Use and Planning*, and 4.17, *Transportation,* of this EIR for further discussion.

With regard to solid waste disposal capacity, the Project would implement a construction waste management plan (WMP) during construction to divert a minimum of 70 percent of all mixed construction and demolition (C&D) debris to City certified construction and demolition waste processors as required by the SMMC. During operation, the Project would divert a minimum of 75 percent of operational solid waste as required by the SMMC through provision of separate Class II solid waste and recycling bins and other measures. See Section 4.15, Utilities, of this EIR for further discussion.

With regard to the potential for environmental accidents, while portions of the Project Site would be utilized for medical uses under the Project, and while such medical uses could potentially use small quantities of hazardous materials, all such hazardous materials use would occur in accordance with applicable regulations. These regulations have been formulated to avoid substantial hazards associated with hazardous materials use. Furthermore, hazardous materials are already used at the Project Site associated with the existing on-site medical uses, such that the Project would not introduce the use of hazardous materials to a site where such materials are not already used. See Section 4.7, Hazards and Hazardous Materials, of this EIR for further discussion.

Lastly, the continued use of non-renewable resources at the Project Site would be on a relatively small scale and would be consistent with the consumption of such resources that would occur with any development in the region, not being unique to the Project. The consumption of resources would be consistent with regional and local growth forecasts in the area, as well as State and local goals for conservation of such resources; and would not affect access to existing resources, nor interfere with the production or delivery of such resources. The Project Site also contains no energy resources that would be precluded from future use because of Project implementation. See Section 4.4, Energy, of this EIR for further discussion.

Based on the above, the Project's irreversible environmental changes would be less than significant.

6.6 Potential Secondary Effects

Section 15126.4(a)(1)(D) of the State CEQA Guidelines requires mitigation measures to be discussed in less detail than the significant effects of the proposed Project if the mitigation measure(s) would cause one or more significant effects in addition to those that would be caused by the Project as proposed. The analysis of Project impacts in Chapter 4, of this EIR resulted in recommended mitigation measures for several environmental topics, which are identified below. The following provides a discussion of the potential secondary effects on those topics that could occur because of implementation of the required mitigation measures. For the reasons stated below,

it is concluded that the Project's mitigation measures would not result in significant secondary effects.

6.6.1 Air Quality

Mitigation Measure MM-AIR-1 requires that Project construction equipment greater than 50 horsepower meet USEPA Tier 4 Final off-road emission standards or their equivalent, and that dumpers/tenders, forklifts, pumps, sweepers/scrubbers and plate compactors be powered by non-diesel fuels, such as gasoline, compressed natural gas or electricity. No construction or operation of additional uses, structures or other improvements, and no additional construction activities, would be required. Furthermore, although this mitigation requires the use of fuels other than diesel to power qualifying construction equipment, the types of fuels required to be used would be less rather than more impacting than diesel fuel (at least with respect to criteria pollutants, TACs, etc.). Therefore, the implementation of these mitigation measures would not result in significant secondary impacts on the environment.

6.6.2 Cultural Resources – Historical Resources

Mitigation Measure MM-HIST-1 requires recordation of the on-site historical resources to be demolished under the Project (e.g., JWCI and CFDC) through the preparation of a Historic American Buildings Survey (HABS) Short Format Report I meeting Secretary of the standards, and the filing of the report with the National Park Service. Mitigation Measure MM-HIST-2 requires development and implementation of a publically accessible interpretive exhibit for the resources. Mitigation Measure MM-HIST-3 requires monitoring of Project excavation and construction activities and associated vibration at 2208/2210 Santa Monic Boulevard to address any unanticipated damage to this structure. No construction or operation of additional uses, structures or other improvements, and no additional construction activities, would be required. Therefore, the implementation of these mitigation measures would not result in significant secondary impacts on the environment.

6.6.3 Cultural Resources – Archaeological Resources

Mitigation Measures MM-ARCH-1 through MM-ARCH-4 establish protections for archaeological resources and human remains through monitoring as well as the treatment, reporting and salvaging of resources/remains should they be encountered. These mitigation measures would ensure that archaeological resources and human remains are not damaged or harmed consistent with State CEQA Guidelines and regulations that provide for the protection of such resources. No construction or operation of additional uses, structures or other improvements, and no additional construction activities, would be required. Therefore, the implementation of these mitigation measures would not result in significant secondary impacts on the environment.

6.6.4 Geology and Soils

Mitigation Measures MM-GEO-1 through MM-GEO-3 establish protections for paleontological resources through monitoring as well as the treatment, reporting and salvaging of resources should they be encountered. These mitigation measures would ensure that paleontological resources are not damaged or harmed consistent with State CEQA Guidelines and regulations that provide for

the protection of such resources. No construction or operation of additional uses, structures or other improvements, and no additional construction activities, would be required. Therefore, the implementation of these mitigation measures would not result in significant secondary impacts on the environment.

6.6.5 Hazards and Hazardous Materials

Mitigation Measures MM-HAZ-1 and MM-HAZ-2 require additional assessment (e.g., soils and soil vapor sampling, UTC survey) of the former on-site service station uses during Project construction, and remediation if required (including implementation of a Soil Management Plan and disposal of any contaminated materials and any USTs at licensed receiving facilities). Mitigation Measure MM-HAZ-3 requires implementation of a Health and Safety Plan (HASP) should MM-HAZ-1 reveal the presence of contamination, with the HASP outlining safety and vapor suppression requirements to avoid both significant health risks to construction workers and the public and vapor concentrations above applicable thresholds in the subterranean levels of the proposed new buildings. Mitigation Measures MM-HAZ-4 and MM-HAZ-5 require asbestos and lead based paint testing of the CFDC, JWCI and SJF Buildings prior to demolition of these structures, and removal of any asbestos and lead based paint found in those buildings in accordance with applicable regulations.

While none of the above mitigation measures would require the construction or operation of additional uses, structures or improvements, and while the majority would not require additional construction activities, the HASP required by MM-HAZ-3 could potentially require some additional on-site earthwork, stockpiling, and sorting of contaminated soils for disposal if contamination is found. This, in-turn, could result in some additional construction-related air emissions and noise during the construction period. However, as any such air emissions and noise would be temporary, would be largely confined to the interior of the Project Site, would be minimal relative to the total amount of proposed earthwork, and would occur only during daylight hours in accordance with SMMC requirements. Therefore, the secondary impacts associated with implementation of MM-HAZ-1 through MM-HAZ-5 would be less than significant.

6.6.6 Noise and Vibration

Mitigation Measure MM-NOISE-1 requires that the use of heavy vibration-generating construction equipment be restricted within specified distances of vibration-sensitive structures, with alternative equipment and construction methods to be used if grading, excavation or other construction activities are required closer than these specified distances to reduce potential vibration levels to less than 0.3 in/sec PPV at the structures. This measure would provide environmental protection and would not require construction of new uses, structures or improvements, or additional construction activities. Therefore, the implementation of this mitigation measure would not result in significant secondary impacts on the environment.

Mitigation Measure MM-NOISE-2 requires Saint John's to perform an inventory of vibration-sensitive medical equipment and rooms/suites in the hospital and Medical Office Buildings not owned/controlled by Saint John's, conduct vibration simulations of project construction activity for at these uses to determine the level of vibration that would result during project construction, and

where construction vibration would exceed applicable thresholds, a detailed mitigation plan would be prepared to avoid significant construction vibration impacts. Such mitigation plan could potentially include measures such as judicious selection of construction equipment and techniques to minimize vibration at source, the sympathetic scheduling of the hours of construction and medical equipment usage/operations, the use of vibration isolation tables for particularly sensitive medical equipment/operations and the possible temporary relocation of affected medical equipment/operations. This measure would provide environmental protection and would not require construction of new uses, structures or improvements, or additional construction activities. Therefore, the implementation of this mitigation measure would not result in significant secondary impacts on the environment.

6.6.7 Transportation

Mitigation Measures MM-TR-1 and MM-TR-2 require that existing through and turn lanes at Intersections 70 (Centinela Avenue/Santa Monica Boulevard) and 77 (Bundy Drive/Santa Monica Boulevard) be reconfigured, which could include restriping and physical improvements within the existing street rights-of-way (such as adjusting raised street medians for added/removed turn lanes). Mitigation Measures MM-TR-3 and MM-TR-4 require restriping of through and turn lanes within the street rights-of-way at Intersections 79 (Bundy Drive/Olympic Boulevard) and 81 (Bundy Drive/I-10 Eastbound On-Ramp). Mitigation Measure TR-2 also requires the relocation of the existing eastbound Big Bus bus stop from the near side of Intersection 77 to consolidate it with the existing Metro bus stop on the far side of the intersection. The very limited construction activities associated with these mitigation measures could generate air emissions, noise and traffic disruptions during construction of the required improvements. However, any such impacts would be temporary and limited largely to existing street rights-of-way. Furthermore, associated construction activities would occur in accordance with applicable air quality and noise regulations (e.g., SCAQMD Rule 403 fugitive dust requirements, SMMC Section 4.12.110 and/or City of Los Angeles regulations restricting construction activities to daylight hours, etc.) that have been formulated to avoid significant construction-related air emissions and noise. Lastly, implementation of the proposed Construction Traffic Management Plan (PDF-TR-1) would ensure the continued free flow of traffic, safe vehicle, bicycle and pedestrian circulation, and adequate emergency access during the construction of the required improvements. Therefore, the implementation of these mitigation measures would not result in significant secondary impacts on the environment.

6.6.8 Wastewater

Mitigation Measure MM-WW-1 requires that additional sewer monitoring be conducted to determine if capacity upgrades are required to the Santa Monica Boulevard sewer line to 20th Street and to the Broadway sewer line downstream of the Project, and if yes, that these upgrades be completed at the expense of the Applicant. Mitigation Measure MM-WW-2 requires investigation of whether the 12-inch sewer line in 20th Street from Broadway to Colorado Avenue can be re-energized to divert sewer flow from the Broadway 21-inch line to the Colorado Avenue 21-inch line, and if re-energizing is determined to be infeasible, that a new sewer line be constructed along 20th Street from Broadway to Colorado to divert flow to the 24-inch Vylon sewer line along Colorado. Both of these mitigation measures could require new off-site sewer lines, the

construction of which could result in air emissions, noise, vibration and traffic flow disruptions during the construction of these sewer lines. However, any such air emissions, noise, vibration and traffic flow disruptions would be temporary, would be restricted to daylight hours in accordance with SMMC Section 4.12.110 requirements, and would occur within existing street right-of-ways. Furthermore, any air emissions, noise and vibration that would be generated during the construction of the new pipelines would be limited owing to the limited amount of trenching required for the new lines, while any associated traffic disruptions would be mitigated by implementation of the proposed Construction Traffic Management Plan (PDF-TRAF-1). Therefore, the secondary impacts associated with implementation of MM-WW-1 and MM-WW-2 would be less than significant.

CHAPTER 7
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Introduction

None.

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None.

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Fatima Clark	Associate III, Cultural Resources
Alyssa Bell	Senior Environmental Field Tech
Denise Kaneshiro	Senior Graphic Designer, Graphics
Stephan Geissler	Managing Associate, GIS
Ron Teitel	Senior Graphic Designer, Shade/Shadow

Cultural Resources Technical Report

ESA
629 Wilshire Boulevard, Suite 1100
Los Angeles, CA 90017

Margarita Jerabek	Director, Cultural Resources
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Geotechnical Report

Wood Environment & Infrastructure Solutions, Inc.
6001 Rickenbacker Road
Los Angeles, CA 90040

Rosalind Munro, CEG	Principal Engineering Geologist
Mark A. Murphy, CEG	Principal Geotechnical Engineer, Project Manager

Hazards – Phase I Environmental Site Assessment

Pacific Environmental Company
28202 Cabot Road, Suite 300
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Michael J. Lyssy, REPA	Property Assessor

Paleontological Resources Technical Report

ESA
80 South Lake, Suite 570
Pasadena, CA 91101

Alyssa Bell	Report Author, Senior Environmental Field Tech

Traffic Impact Assessment

Fehr and Peers
600 Wilshire Boulevard, Suite 1050
Los Angeles, California 90017

Netai Basu, AICP CTP	Project Manager
Cheryl Deutsch Croshere	Transportation Planner

Civil Technical Studies (Hydrology, Water, Sewer)

KPFF Consulting Engineers
700 South Flower Street, Suite 2100
Los Angeles, CA 90017

Adam Vorwald, EIT	Civil Engineer

Water Supply Assessment

Todd Groundwater
2490 Mariner Square Loop, Suite 215
Alameda, CA 94501

Iris Priestaf	President
Maureen Reilly, PE	Senior Engineer