

# Attachment C



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January 25, 2022

Jason Hernandez  
City Planning Associate  
City of Los Angeles  
Department of City Planning  
200 N. Spring St., Room 621  
Los Angeles, CA 90012

**Subject:** Responses to Appeal submitted by Adams Broadwell Joseph & Cardozo on the HPMC Building Project Addendum, Case Numbers: APPCC-2020-1764-SPE-SPP-SPR and ENV-2015-310-MND-REC1

Dear Mr. Hernandez,

Meridian Consultants has been providing environmental planning consulting services to public agencies and private sector clients throughout southern California for the past decade. Meridian's expertise includes preparation of a broad range of environmental documents to meet the requirements of the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). Our team has consistently been at the forefront of emerging issues, such as climate change and water supply sustainability, and we are regularly sought out for our CEQA and NEPA expertise and technical capabilities to address complex projects.

In addition, Meridian Consultants is on the City of Los Angeles Department of City Planning's list of consultants approved to provide Environmental Consulting Services for Development Projects in the City of Los Angeles. Our firm has prepared numerous environmental review documents, including Environmental Impact Reports (EIRs), Sustainable Community Environmental Assessments (SCEAs), Categorical Exemption Findings, Mitigated Negative Declarations (MNDs), Negative Declarations (NDs) and Addendums to NDs, MNDs and EIRs for a wide range of projects throughout the City.

Meridian Consultants assisted the Department of City Planning with the preparation of the HPMC Building Project Addendum (Case Number: ENV-2015-310-MND-REC1). Meridian has reviewed the appeal letter dated December 6, 2021 from Adams Broadwell Joseph & Cardozo on behalf of Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA"). The appeal justification includes as an attachment the letter dated October 18, 2021, also from Adams Broadwell Joseph & Cardozo, and which contains the substance of their argument. The attached letter, dated October 21, 2021, provides our responses to the points made to that letter. As previously noted in the attached letter, no changes in the conclusions of the Addendum are merited in response to the appeal letter, and the points made in the letter are without merit.

Please contact me if you have any questions on these responses.

Sincerely,

**Meridian Consultants LLC**

A handwritten signature in blue ink, appearing to read "Tony Locacciato".

Tony Locacciato, AICP  
*Partner*



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October 21, 2021

Jason Hernandez  
City Planning Associate  
City of Los Angeles  
Department of City Planning  
200 N. Spring St., Room 621  
Los Angeles, CA 90012

**Subject:** Responses to Comments  
HPMC Building Project Addendum

Dear Mr. Hernandez,

Meridian Consultants assisted the Department of City Planning with the preparation of the HPMC Building Project Addendum (Case Number: ENV-2015-310-MND-REC1).

We have reviewed the comments on the Addendum in the letter dated October 18, 2021 from Adams Broadwell Joseph & Cardozo on behalf of Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA"). This letter includes comments on the noise, air quality, energy, and GHG analysis in the City's Addendum and a comment on the proposed exception from the Vermont/Western Transit Oriented District (Station Neighborhood Area) Specific Plan.

The responses to these comments demonstrate that the information and analysis in the Addendum constitutes substantial evidence that the proposed modification of the Approved Project to add medical office space will not result in any new or substantially more severe impacts than were identified in the previous MND, and that the comments do not provide substantial evidence to support a fair argument that would require the preparation of a subsequent MND or environmental impact report.

Attached, please find our responses to these comments. Sections of the comment letter are listed by number and identified by the page and section number of the comment letter.

Please contact me if you have any questions on these responses.

Sincerely,

**Meridian Consultants LLC**

A handwritten signature in blue ink, appearing to read "Tony Locacciato", written in a cursive style.

Tony Locacciato, AICP  
*Partner*

## HPMC Building Project Addendum

### Response to Comments from Adams Broadwell Joseph & Cardozo, dated October 18, 2021

#### **Response to Comment No. 1** [p. 1 – 3, Introduction]

The comment introduces the commenting parties and includes a summary of the project. The comment does not state a specific concern or question regarding the adequacy of the Addendum in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. For this reason, no further response to this comment is provided.

This comment subsequently states that the Revised Project involves substantial changes to the Approved Project that will result in more additional impacts that require the preparation of a supplemental EIR or MND. The responses to the individual technical comments below demonstrate that the conclusion in the Addendum to the Adopted MND are supported by substantial evidence and the changes to the Approved Project will not result in new or substantially more severe impacts that would require the preparation of a supplemental EIR or MND.

#### **Response to Comment No. 2** [p. 3 – 4, Section I]

The comment introduces the real party in interest represented by the commenting parties and does not state a specific concern or question regarding the adequacy of the Addendum in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. For this reason, no further response to this comment is provided.

#### **Response to Comment No. 3** [p. 4 – 9, Section II & II.A]

This comment begins by presenting an overview of the environmental review requirements defined in the California Environmental Quality Act (CEQA) and CEQA Guidelines. Subsequently, this comment presents an overview of the legal standard of review applicable to subsequent approvals for activities that have been analyzed in an MND. The comment cites to *Friends of College of San Mateo Gardens v. San Mateo County Community College Dist. (San Mateo Gardens I)*, 1 Cal.5th 937 (2016) and to *Friends of College of San Mateo Gardens v. San Mateo County Community College Dist. (San Mateo Gardens II)* (2017) 11 Cal.App.5th 596 in support of this legal standard. However, the comment incorrectly conflates the legal standards for a) whether the Revised Project may be analyzed under CEQA's subsequent review provisions, and b) whether an Addendum is the appropriate method of complying with these subsequent review provisions for the Revised Project.

This comment states, in support of its argument, that the Revised Project's Addendum includes analysis for "an entirely new use that was not analyzed in the original IS/MND", and concludes that "the Project may have new or more severe significant impacts than previously analyzed in the IS/MND". However, the question of whether or not a local agency may analyze a revised project under CEQA's subsequent review provisions does not turn on whether a project is "new" in an abstract sense, but rather on a determination by the local agency that "the original document retains some informational value". (*San Mateo Gardens I, supra*, at 952.) Whether an initial environmental document remains relevant despite changed plans or circumstances is "a predominantly factual question...for the agency to answer in the first instance," which a court may review to determine whether the agency's determination "is supported by substantial evidence." Here, the City logically determined that as the Revised Project would be constructed on top of the parking structure studied in the Approved Project's MND, the MND retained informational value for analyzing the Revised Project and the appropriate pathway for review of the Revised Project is through

CEQA's subsequent review provisions. The question addressed by the Addendum, therefore, is not whether the Revised Project is "an entirely new use", but rather whether the addition of three floors of medical office space on top of the parking garage analyzed in the Approved Project will result in new significant environmental effects or other changes described in Section 15162(a) of the CEQA Guidelines.

Moreover, the Addendum does not describe a new use, but rather contains a full and complete description of proposed medical office space proposed as a physical addition to the existing parking structure. The analysis in the Addendum fully addresses the potential environmental impacts associated with the construction and occupancy and use of this medical office space. It is important to note that both the existing parking garage and proposed medical office space are part of the Hollywood Presbyterian Medical Center (HPMC), a long-established health care facility in Hollywood that includes a hospital and medical office space. In this regard, this is not a "new" use, but rather medical office space associated with the existing HPMC, which is part of an existing concentration of hospital facilities in this portion of Hollywood that is specifically recognized in the City's Vermont/Western Station Neighborhood Area Plan ("SNAP") Specific Plan, which regulates land use in the vicinity of the Revised Project.

The remainder of this comment correctly states that, after passing the threshold question of whether the Revised Project may be analyzed under the subsequent review provisions of CEQA, the legal standard in *San Mateo Gardens II* is that the decision to do so by preparing an addendum to a previous MND may be reviewed according to whether "there is substantial evidence to support a fair argument that proposed changes 'might have a significant environmental impact not previously considered in connection with the project as originally approved.'" However, as the responses to the individual technical comments below demonstrate, the conclusion in the Addendum – that the changes to the Approved Project will not result in new or substantially more severe impacts – is supported by substantial evidence, and the comments provided in this letter do not provide substantial evidence to support a fair argument that a subsequent MND or EIR is required.

#### **Response to Comment No. 4** [p. 9 – 10, Section II.A.1(a)]

This comment incorrectly states that the Addendum identifies new and significant construction noise impacts resulting from the revised project. The Addendum states that impacts related to noise were determined to be less than significant with mitigation incorporated in the Approved Project, but only due to potential operational noise impacts from automobiles entering and exiting the parking structure.<sup>1</sup> These impacts were addressed through Mitigation Measures XII-40 and XII-30, which were implemented during construction of the existing parking structure analyzed in the Approved Project and would continue to remain in force for the Revised Project.<sup>2</sup>

For the Revised Project, the Addendum found that no significant noise impacts, including impacts related to construction, would occur. The applicable threshold for significant noise impacts under Appendix G of the CEQA Guidelines is "[g]eneration 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." As stated in the Addendum, the only applicable noise standards for the Project are Section 41.40 and Section 112.05 of the Los Angeles Municipal Code (LAMC). Section 41.40 provides limitations on hours of demolition and construction activities, while Section 112.05 specifies that the maximum noise level that may be generated by construction machinery within 500 feet of a residential zone is 75 dBA (measured at a distance of 50

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<sup>1</sup> Addendum, p. 116

<sup>2</sup> IS/MND, p. 4.0-73

feet from the source) unless compliance with this limitation is “technically infeasible”, which Section 112.05 defines to mean that “said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction devices or techniques during the operation of the equipment.” The significance threshold of the 2006 Los Angeles CEQA Thresholds Guide, which this comment references to argue that the project would have a significant impact on noise, does not apply to the Project, as the City has discontinued use of its own independent thresholds and now relies solely on the Appendix G thresholds.

As shown in Table 4.13-2 of the Addendum and as explained in further detail in Appendix B, Noise Study, construction noise levels would not exceed 75 dBA, even without mitigation, and would thus be consistent with Section 112.05 of the LAMC. The use of mufflers and other regulatory compliance measures, in adherence with Section 112.05 would further reduce the already less than significant noise levels. Reference to “a maximum increase of .9 dBA above the significance threshold without implementation of regulatory compliance measures”, as cited by this comment from page 118 of the Addendum, was in error, as it refers to the now-discontinued 2006 Los Angeles CEQA Thresholds. There is no significant noise impact under the currently operative noise standards, and therefore no requirement for mitigation measures.

**Response to Comment No. 5** [p. 11 – 13, Section II.A.1(b)]

This comment states that the Addendum failed to disclose the full extent of the Revised Project’s noise impacts because it measured ambient noise in February 13, 2020, after construction of the parking structure analyzed by the Approved Project. The comment relies on a provision of the Los Angeles CEQA Thresholds to argue that noise levels with the Revised Project must be compared to ambient noise without the project. However, as stated above in Response to Comment No. 4, the 2006 Los Angeles CEQA thresholds have been discontinued. Accordingly, the only applicable standards for noise are those stated above in Response to Comment No. 4, for construction, and Section 112.02 of the LAMC for operation.

As stated on page 120 of the Addendum and in Appendix B, Noise Study, no significant impacts related to operational noise would occur under these standards. For stationary sources, the Project would be required to comply with Section 112.02 of the LAMC which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA. New stationary sources of noise, such as rooftop mechanical HVAC equipment would be shielded and would adhere to Section 112.02. Regarding operation, changes in traffic noise are generally audible if there is a 3 dBA or greater increase. Traffic volumes would need to double in order to generate a 3 dBA increase in noise. As the project would not create additional parking and would not generate a doubling in the trips associated with HPMC, traffic-generated noise impacts would not result in an increase of 5 dBA, and therefore would not be significant.

This comment also argues that reliance on a maximum noise level as the sole threshold of significance for ongoing noise impacts violates CEQA. As noted above, the applicable standards referenced in the Addendum for operational noise require that stationary equipment not exceed the ambient noise level on neighboring properties by more than 5 dBA. This standard does not make use of a maximum noise level of the type described in the cases cited; accordingly, this comment is inapplicable. Additionally, this comment pertains to the City’s adopted noise standards, not to the Revised Project.

**Response to Comment No. 6** [p. 13 - 14, Section II.A.1(c)]

This comment states that the Addendum did not analyze whether noise impacts of the existing parking structure analyzed in the Approved Project and the proposed medical offices analyzed in the Revised Project would be

significant when combined. However, the Approved Project has already implemented and will continue to maintain Mitigation Measures XII-40 and XII-30, as previously discussed in Response to Comment No. 4, in order to mitigate any potential impact of vehicle noise within the existing parking structure. Potential impacts from new stationary sources of noise associated with the medical office space, such as rooftop mechanical heating ventilation air conditioning (HVAC) equipment, would be reduced below the level of significance by compliance with Section 112.02 of the LAMC, as previously discussed in Response to Comment No. 5. Accordingly, potential noise impacts of the parking structure and medical office have already been addressed and will be less than significant.

**Response to Comment No. 7** [p. 14 – 16, Section II.A.1(d)]

A list and map showing the location of related projects considered in the cumulative impact analysis is provided in the Traffic Study in Appendix C to the Addendum. Table 4 in the traffic study provides this list of related projects and Figure 8 in the traffic study shows the location of these projects. The nearest related projects include the construction of an acute care services replacement building at HPMC (Case No. DIR-2016-3207-SPP-SPR) and the construction of a mixed-use project located almost 1,000 feet north of the Project site on the northwest corner of Hollywood Boulevard and Hillhurst Avenue, which are both located almost 1,000 ft away from the Revised Project and are both separated from the Project Site by multiple buildings or streets. Sound generated by a line source decreases rapidly with increasing distance, typically attenuating at a rate of 3 dBA and 4.5 dBA per doubling of distance from the source to the receptor for hard and soft sites, respectively.<sup>3</sup> The sites of these related projects are not located close enough to the Project site to result in cumulative short term construction noise impacts, and as stated in Appendix B, Noise Study, to the Addendum, both related projects would be required by existing regulatory compliance measures to implement best management practices during construction and to abate ongoing noise from stationary sources during operation. There are no known related projects proximate enough to the project site to result in significant short term construction impacts, and this comment does not provide substantial evidence to suggest that other, undisclosed projects will provide additional cumulative noise impacts.

**Response to Comment No. 8** [p. 16 – 18, Section II.A.1(e)]

This comment incorrectly states that the Revised Project would adopt nonbinding or ineffective mitigation. The MND adopted by the City for the Approved Project concluded that compliance with existing regulatory compliance measures in the LAMC would result in short term construction impacts being less than significant. No mitigation measures for short term construction noise were adopted for the Approved Project and, as stated above in Response to Comment No. 4, the analysis of construction noise in the Addendum concludes that noise from construction of the medical office space addition would not result in significant noise impacts. No mitigation measures are, therefore, identified, and this comment is not relevant.

**Response to Comment No. 9** [p. 18 - 19, Section II.A.1(f)]

All mitigation measures and conditions of approval applicable to the Approved Project were implemented. As presented in this comment, Mitigation Measure MM XII-30 stated: “A 6-foot-high solid decorative masonry wall adjacent to residential use and/or zones shall be constructed if no such wall exists.” Prior to approval of the Approved Project, a shorter masonry wall existed in between two existing homes, as shown in the Google Earth image from April 2015 below:

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<sup>3</sup> Addendum Appendix B, Noise Study, p. 5



Pursuant to Mitigation Measure MM XII-30, all newly constructed portions of the wall around the home shown in the photograph are 6 feet in height, as measured on the side adjacent to the home. The portion of the wall facing the parking structure shown in the February 2021 photograph included in this comment is partially obscured by soil placed for landscaping installed at this location. The portions of the original wall that predate construction, including the portion adjacent to the front of the home's driveway, may be less than 6 feet in height, as they were not required to be installed by Mitigation Measure MMXII-30.

The plywood shown above the wall was installed by the owner of the home during construction of the parking structure to enhance visual privacy, rather than to limit any noise impacts. HPMC reimbursed the homeowner for the cost of installing this plywood.

**Response to Comment No. 10** [p. 20 - 23, Section II.A.1(g)]

This comment states that there is substantial evidence to support a fair argument demonstrating that the Revised Project has significant noise impacts more severe than previously analyzed. However, as demonstrated in responses to the individual noise comments above, the previous comments are primarily composed of unsupported statements that rely upon inapplicable and discontinued noise standards, or upon misreadings of the Addendum. Responses to prior comments demonstrate that the conclusions of the noise analysis in the Addendum are supported by substantial evidence that the noise generated by construction and occupancy and use of the proposed medical office space will not result in significant impacts that were not analyzed in the adopted MND for the Approved Project.

**Response to Comment No. 11** [p. 23 – 26, Section II.B]

This comment asserts that the Addendum should have included a quantitative health risk assessment (HRA) to evaluate construction impacts. The City follows South Coast Air Quality Management District (SCAQMD) guidance for air quality analysis and relies on SCAQMD thresholds. The SCAQMD CEQA guidelines for evaluating construction impacts do not require the preparation of an HRA to evaluate construction impacts. For construction, SCAQMD provides daily mass emissions thresholds and localized significance thresholds. As shown in the Addendum and the Adopted MND, the project would not exceed applicable SCAQMD thresholds. Therefore, the City determined the Project would have a less than significant impact based on the methodologies recommended by SCAQMD for the project type.

SCAQMD requires HRAs for compliance with AB2588, SCAQMD Rule 1401 and Rule 1402, which regulate stationary emission sources. SCAQMD has also adopted guidance on the use of HRAs for analyzing mobile source emissions. However, this guidance refers to emissions associated with facilities such as truck stops and distribution centers that feature long term presence of diesel emission sources. The Project would not consist of this or any other land use type that would emit substantial diesel particulate matter over long periods of time. Therefore, no cancer risk assessment is required under the SCAQMD guidance

The letter also references the “Risk Assessment Guidelines” of the Office of Environmental Health Hazard Assessment, stating that “The OEHHA document recommends that all short-term projects lasting at least two months be evaluated for cancer risks to nearby sensitive receptors.” Page 8-17 the OEHHA Guidance Manual reads “The local air pollution control districts sometimes use the risk assessment guidelines for the Hot Spots Program in permitting decisions for short-term projects such as construction or waste site remediation. Frequently, the issue of how to address cancer risks from short-term projects arises.” Page 8-18 provides OEHHA recommendations for how to address cancer risks from short-term projects if a local air pollution control district chooses to do so. As such the OEHHA document provides guidance for how to address cancer risks from short-term projects if a local agency chooses to do so but does not state that all short-term projects should be evaluated in this way.

The OEHHA Guidance Manual is intended to implement the Air Toxics Hot Spots Information and Assessment Act (AB 2588) and establishes protocols for analysis, but does not establish when a project must prepare a cancer risk assessment. The OEHHA Guidance Manual states on page 1-3 that “The Hot Spots Act requires that each local Air Pollution Control District or Air Quality Management District (hereinafter referred to as District) determine which facilities will prepare an HRA.” California Health and Safety Code Section 44320 states that AB 2588 applies to “Any facility which manufactures, formulates, uses, or releases” toxic air contaminants, carcinogens, total organic gases, particulates, or oxides of nitrogen or sulfur and “any facility which is listed in any current toxics use or toxics air emission survey, inventory, or report released or compiled by a district.” The Project does not qualify as a “facility” subject to AB 2588 and the local district (SCAQMD) has not issued guidance or regulation for an HRA of the type of construction proposed by the Project.

The SCAQMD has not determined that an HRA is required for commercial and residential land uses proposed by the Project. Furthermore, SCAQMD has not developed any recommendations on use of the OEHHA Guidance Manual for CEQA analyses of potential construction impacts nor has the City adopted the Guidance Manual or incorporated it into the City’s CEQA thresholds or methodologies. As such, the OEHHA Guidance Manual is not applicable to determining the impacts of the Project.

**Response to Comment No. 12** [p. 26 - 27, Section II.C]

This comment incorrectly presumes a backup generator will be required for the proposed medical office space. This assumption is incorrect. A backup generator is only required for medical facilities categorized by the State of California Office of Statewide Health Planning and Development (OSHPD) in Title 24, the California Building Standards Code as “OSHPD 3” level facilities. OSHPD 3 requirements are applied to clinics that are licensed pursuant to Health and Safety Code Section 1200. A 'clinic' is a medical care facility that is licensed by the California Department of Health Services. Generally, a doctor's or dentist's office operates under the doctor's license and is not a clinic subject to OSHPD 3 requirements. The proposed general medical office space will not contain any medical uses or facilities required to meet OSHPD 3 requirements and, for this reason, no backup generator will be required.

**Response to Comment No. 13** [p. 27 – 29, Section II.D]



The Adopted MND for the Approved Project and the Addendum for the Revised Project both contain an assessment of potential GHG emissions that meet CEQA requirements. This comment references draft thresholds developed by the South Coast Air Quality Management District (SCAQMD) in 2008. What this comment does not disclose is that in December 2008, the SCAQMD Governing Board adopted an interim GHG significance threshold of 10,000 MTCO<sub>2</sub>E per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for commercial or residential projects.

The December 2008 staff report discusses a draft 3,000 MTCO<sub>2</sub>eq/yr screening threshold for commercial uses, but states that additional analysis was needed to further define appropriate performance standards for commercial and residential uses. The SCAQMD Board has not adopted a threshold for commercial uses that is applicable to the proposed medical office space. In fact, no public agency has adopted a quantified threshold of significance for GHG emissions that applies to commercial uses.

Amendments to CEQA Guidelines Section 15064.4 were adopted in 2017 to assist lead agencies in determining the significance of the impacts of GHG emissions. CEQA Guidelines Section 15064.4 gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. CEQA Guidelines Section 15064.4(b) specifies that a lead agency shall use the following criteria in determining significance:

- (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or suggested by other experts, such as CAPCOA, so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The California Natural Resources Agency has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and therefore GHG emissions should be analyzed in the context of CEQA's requirements for cumulative impact analyses (see CEQA Guidelines Section 15064(h)(3)).

The SCAQMD, Office of Planning and Research, California Air Resources Board (CARB), CAPCOA, or any other state or regional agency have not adopted a numerical significance threshold for assessing impacts related to GHG emissions that is applicable to the Project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on the third option under CEQA Guidelines Section 15064.4(b) to determine a project's consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions.

The analysis in the Adopted MND and Addendum contain information and analysis responding to the applicable thresholds in the City's Initial Study checklist:

- a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

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

A quantified estimate of GHG emissions associated with construction and occupancy and use (operations) of the proposed medical office space is provided along with analysis of the consistency of the Project with applicable GHG reduction plans to determine if the Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The analysis in the Addendum includes appropriate information and analysis to support the conclusion that the GHG emissions associated with the Project will not conflict with applicable GHG reduction plans or result in a significant effect on the environment.

**Response to Comment No. 14** [p. 29 - 30, Section II.E]

This comment assumes without evidence that the proposed general medical office space will include “energy intensive medical equipment”. This comment does not provide any elaboration on what type of medical equipment would be considered “energy intensive”. The medical office space proposed will contain only small pieces of standard medical diagnostic and treatment equipment, and will not contain any medical equipment that will use large amounts of energy. As disclosed in the Addendum, the proposed medical office space will meet all current applicable energy conservation standards and would be built and operated in accordance with the applicable State Building Code Title 24 regulations and City of Los Angeles Green Building code, which impose energy conservation measures. In compliance with these applicable standards, the medical office space addition will be required to include a “cool roof”, as described in this comment. The Revised Project will not result in the wasteful or inefficient use of energy and, for this reason, as supported by the information and analysis in the Addendum, the Project will not result in significant energy impacts.

**Response to Comment No. 15** [p. 30 – 31, Section II.F]

As stated in the Department of City Planning Recommendation Report for the Project, the Project is requesting a Specific Plan Exception to Section 9.E.3 of the Vermont/Western Station Neighborhood Area Plan ("SNAP") Specific Plan. Section 9.E.3 of the Vermont/Western SNAP requires two (2) parking spaces per 1,000 square feet of commercial floor area, except for "Hospital and Medical Uses". Although Section 4 of the SNAP includes medical offices and clinics, such as those that would be developed by the Project, within its definition of Hospital and Medical Uses, Section 9.E.4, which states that it provides the parking requirements for Hospital and Medical Uses, only provides a parking ratio applicable to hospital buildings with a set number of licensed patient beds. This standard cannot be applied to parking for medical offices and clinics, which do not have a set number of licensed patient beds, and Section 9.E.4 is therefore inapplicable, making Section 9.E.3 the operative provision of the SNAP from which the Project is requesting a Specific Plan Exception.

Per Section 3 of the SNAP, the provisions of the SNAP "prevail and supersede" the applicable provisions of the Los Angeles Municipal Code (LAMC) when they "require or permit greater or lesser...parking, or other controls on development than would be allowed or required pursuant to the provisions [of the LAMC]". In the event that the SNAP offers no such applicable provisions, the underlying LAMC provisions control. Pursuant to LAMC 12.21 A.4(x)(3), required parking for medical office and clinic uses within a State Enterprise Zone is two spaces per 1000 square feet of floor area. The Project is located within the Los Angeles State Enterprise Zone, per Zoning Information No. 2374, and is therefore eligible for this parking ratio. The base amount of required parking for the Project, which will add 95,995 square feet of floor area, would therefore be 192 spaces, and this the quantity of parking spaces for which the project is requesting a Specific Plan Exception. However, as noted in the Recommendation Report, parking for the new medical office uses would be provided in the existing parking structure, notwithstanding the

Specific Plan Exception, as the total supply of parking at all of the HPMC properties is operated on a campus-wide basis and there are ample parking spaces from a campus-wide perspective. Per Case No. DIR-2017-5247-SPP, 1,496 spaces are available on the HPMC campus, compared to minimum required parking of 1,156 spaces and maximum allowable parking of 1,591 spaces under the SNAP.

**Response to Comment No. 16** [p. 31 – 32, Conclusion]

The responses to the specific comments in this letter demonstrate that the Addendum contains adequate analyses of the potential noise, air quality, health, GHG, and energy impacts associated with the Revised Project, and that these comments have not provided substantial evidence to support a fair argument that preparation of a supplemental EIR or subsequent MND is required.

**Response to Comment No. 17** [Exhibit A, p. 1-2, Introduction and Project Description]

This comment contains introductory statements and a summary of the project. The comment does not state a specific concern or question regarding the adequacy of the Addendum in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. For this reason, no further response to this comment is provided.

**Response to Comment No. 18** [Exhibit A, p. 2, Specific Comment #1]

The comment states that a version of CalEEMod was used for the analysis is now outdated, as CAPCOA released the latest version of CalEEMod on June 1, 2021.

At the time the Addendum was prepared, CalEEMod version 2016.3.2 was the current emissions inventory software program recommended by SCAQMD. This model assumed compliance with now-superseded regulations, including California Air Resources Board's (CARB's) EMFAC2013 emission factors and the 2016 Title 24 requirements, and used the Institute of Transportation Engineers (ITE) 9th edition trip rates, which have since been updated. On June 2021, SCAQMD released the latest version of CalEEMod (version 2020.4.0) which provides revisions and additions to the model including CARB's EMFAC2017 emission factors, 2019 update to Title 24 building requirements, ITE 10th edition trip rates, and updated Utility Intensity Factors for air quality and greenhouse gases. As the Revised Project will be constructed subject to the more stringent regulations included in the updated CalEEMod, which all contribute to reductions in AQ and GHG emissions, previous analysis based on CalEEMod version 2016.3.2 provides a conservative analysis related to emissions that will ultimately be generated by the Revised Project. Thus, a rerun of the model would further reduce the emissions presented in the Addendum

**Response to Comment No. 19** [Exhibit A, p. 3 – 5, Specific Comment #2]

Please see Response to Comment No. 13 regarding the GHG analysis in the Addendum for the proposed modification of the Approved Project to include medical office space.

**Response to Comment No. 20** [Exhibit A, p. 5 – 7, Specific Comment #3]

Please see Response to Comment No. 12 regarding whether a backup generator is required for the proposed medical office space. As stated in this response, a backup generator is not required for the proposed project.