

**ATTACHMENT C**

**INITIAL ENVIRONMENTAL STUDY, MITIGATED NEGATIVE DECLARATION  
AND MITIGATION MONITORING AND REPORTING PROGRAM**



**City of Pasadena  
Planning Division  
175 N. Garfield Avenue  
Pasadena, California 91101-1704**

**PROPOSED MITIGATED NEGATIVE DECLARATION**

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**PROJECT TITLE:** Proposed Huntington Memorial Hospital Emergency Department and Vertical Expansion Project

**PROJECT APPLICANT:** Huntington Memorial Hospital

**PROJECT CONTACT PERSON:** Erin Clark, Assistant Planner

**ADDRESS:** Planning and Development Department  
100 North Garfield Avenue, Room S116  
Pasadena, CA 91109

**TELEPHONE:** (626) 744-4660

**PROJECT LOCATION:**  
100 West California Boulevard  
City of Pasadena  
County of Los Angeles  
State of California

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**PROJECT DESCRIPTION:** The Project consists of two major components: an amendment to the Huntington Memorial Hospital Master Development Plan, and the development of the Emergency Department and Vertical Expansion Project. The proposed Master Development Plan Amendment would allow the development of the proposed Emergency Department and Vertical Expansion Project to occur and includes the following:

- Revision of the Master Development Plan site plan to accommodate the Fairmount Avenue realignment and the Hospital Emergency Department and Vertical Expansion;
- An increase in the allowable floor area to accommodate the Expansion; and
- Establishment of a height limit for the Expansion.

During the course of the proposed Project activities, the Hospital Emergency Department would remain open and continue to operate at existing levels. The proposed Emergency Department and Vertical Expansion Project at the Huntington Memorial Hospital would consist of several elements in the following four phases:

- **Phase One** would include the demolition of the medical office building at 47 Congress Street, utility connection staging, and the realignment of Fairmount Avenue between California Street and Congress Street;
- **Phase Two** would include the construction of the new 22,120 square-foot Emergency Department addition, a 16,180 square-foot first-floor addition, 1,170 square-foot first-floor renovation, 16,180 square-foot second-floor addition, and the roof level addition;
- **Phase Three** would include the renovation of the existing Emergency Department; and
- **Phase Four** would include the build out of the radiology and computed tomography (CT) scan rooms on the ground floor.

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**FINDING**

On the basis of the initial study on file in the Current Planning Office:

The proposed project COULD NOT have a significant effect on the environment.

The proposed project COULD have a significant effect on the environment, however there will not be a significant effect in this case because the mitigation measures described in the Mitigation Monitoring Program on file in the Planning Division Office were adopted to reduce the potential impacts to a level of insignificance.

The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

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Completed by: Erin Clark  
 Title: Assistant Planner  
 Date: November 16, 2007

Determination Approved: Jennifer Paige-Saeki  
 Title: Senior Planner  
 Date: November 16, 2007

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PUBLIC REVIEW PERIOD: November 20 – December 12, 2007

COMMENTS RECEIVED ON DRAFT:  Yes  No

INITIAL STUDY REVISED:  Yes  No

**HUNTINGTON MEMORIAL HOSPITAL  
EMERGENCY DEPARTMENT  
AND VERTICAL EXPANSION PROJECT  
INITIAL STUDY**

Lead Agency:

City of Pasadena  
175 North Garfield Avenue  
Pasadena, California 91101-1704

Preparer:

HELIX Environmental Planning, Inc.  
3600 Lime Street, Suite 721  
Riverside, California 92501  
Phone: (951) 328-1700

November 19, 2007

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**CITY OF PASADENA  
175 NORTH GARFIELD AVENUE  
PASADENA, CA 91101-1704**

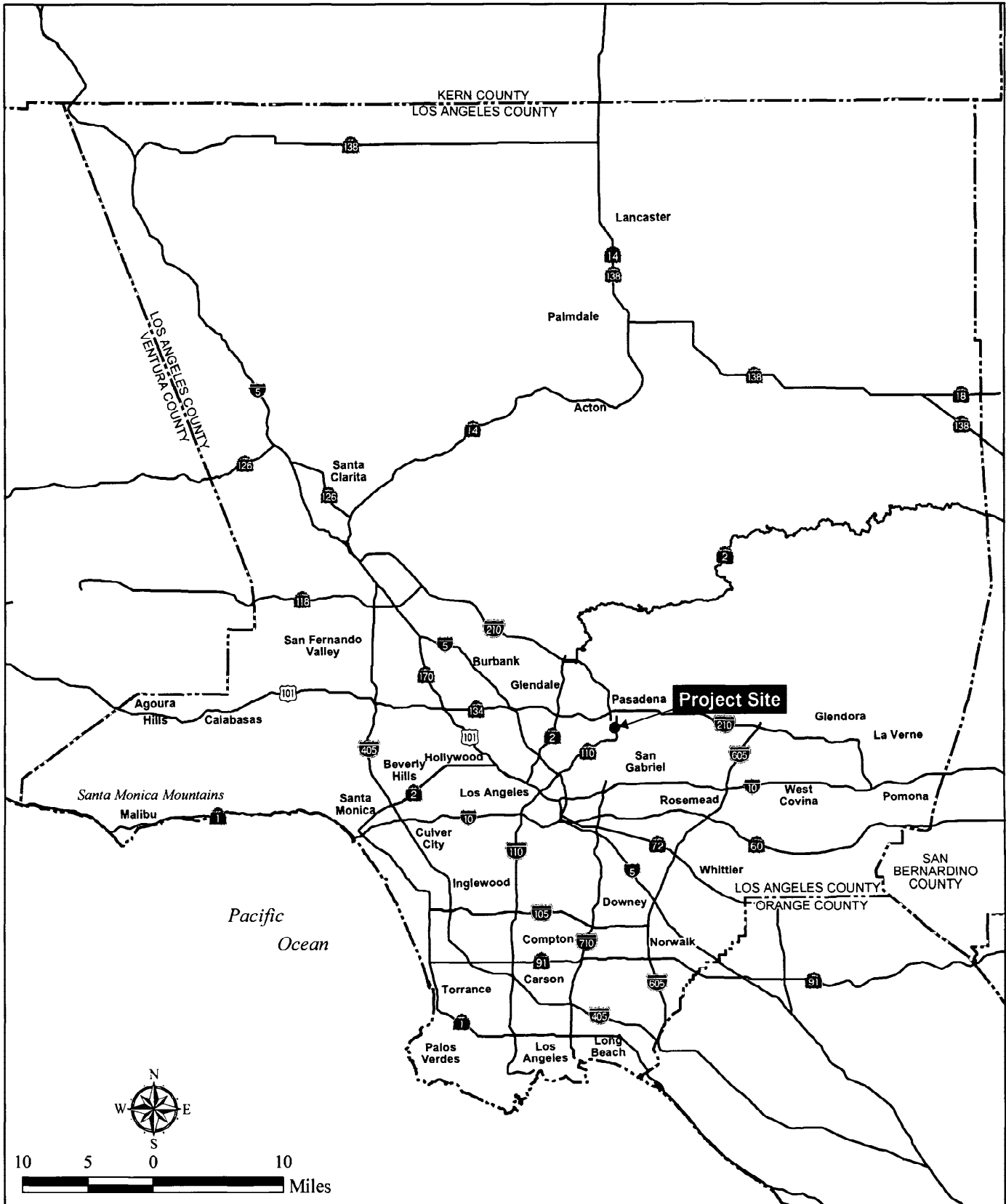
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**INITIAL STUDY**

In accordance with the Environmental Policy Guidelines of the City of Pasadena, this analysis, the associated "Master Application Form," and/or Environmental Assessment Form (EAF) and supporting data constitute the Initial Study for the subject Project. This Initial Study provides the assessment for a determination whether the Project may have a significant effect on the environment.

**SECTION I – PROJECT INFORMATION**

- 1. Project Title:** Huntington Memorial Hospital Emergency Department and Vertical Expansion Project
- 2. Lead Agency Name and Address:** City of Pasadena  
Planning and Development Department  
175 North Garfield Avenue  
Pasadena, CA 91109
- 3. Contact Person and Phone Number:** Erin Clark, Assistant Planner  
(626) 744-4660
- 4. Project Location:** The Project site, Huntington Memorial Hospital (Hospital), is located in the City of Pasadena, County of Los Angeles, south of California Boulevard and west of Fair Oaks Avenue (Figures 1 and 2). The Project site includes the Emergency Department and adjacent area, within the existing Hospital campus. The Emergency Department is generally located northwest of the intersection at Fairmount Avenue (a private road) and Congress Street. The Project area also includes the area located northeast of this intersection.
- 5. Project Sponsor's Name and Address:** Huntington Memorial Hospital  
100 West California Boulevard  
Pasadena, California 91105
- 6. General Plan Designation:** South Fair Oaks Specific Plan
- 7. Zoning:** PS (Public/Semi Public) and IG (Industrial)/SP-2 (South Fair Oaks Specific Plan)
- 8. Description of the Project:** The Project consists of two major components: an amendment to the Huntington Memorial Hospital Master Development Plan, and the development of the Emergency Department and Vertical Expansion Project. The Huntington Memorial Hospital Master Development Plan was adopted in 1987. Table 1 provides a summary of the Huntington Memorial Hospital Master Development Plan and its amendments from 1987 to the present.



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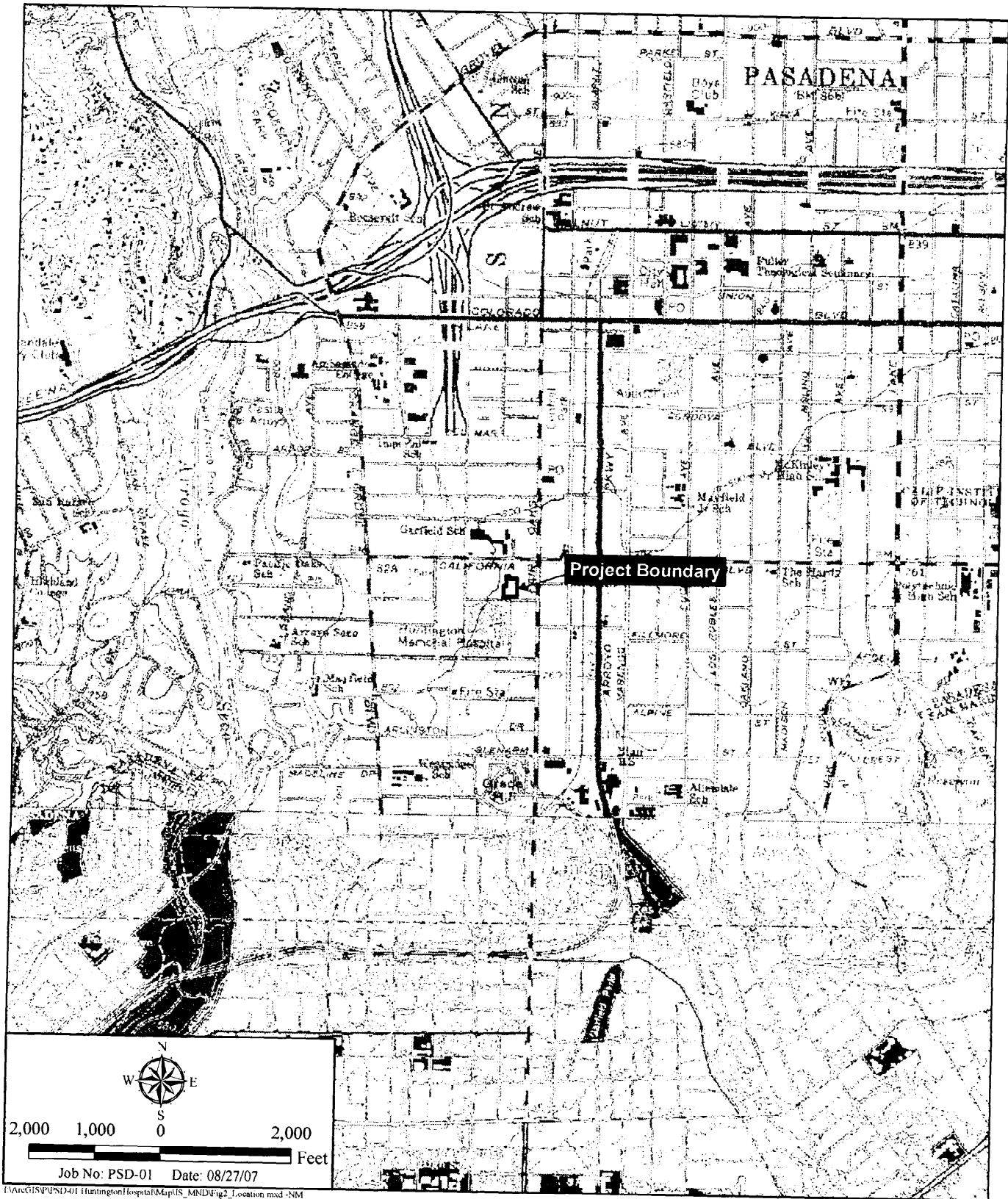
## Regional Map

HUNTINGTON MEMORIAL HOSPITAL EMERGENCY DEPARTMENT AND VERTICAL EXPANSION PROJECT

**HELIX**

Figure 1





**Project Location Map**

HUNTINGTON MEMORIAL HOSPITAL EMERGENCY DEPARTMENT AND VERTICAL EXPANSION PROJECT



Figure 2

**Table 1  
Huntington Memorial Hospital Master Development Plan**

<b>Date</b>	<b>Action</b>	<b>Description</b>
1987	Initial Adoption (Phase I)	The Master Development Plan is a 40-year multi-phase hospital redevelopment project designed to provide newer, more efficient, and safer medical facilities. The Plan (Phase I) includes construction of: <ul style="list-style-type: none"> <li>• 172,000 square-foot main hospital building;</li> <li>• Two-level, 750-car partially underground parking garage; and</li> <li>• Separate 61,000-square-foot, 80-bed psychiatric hospital.</li> </ul>
1994	Amendment Adoption (Phases II and III)	The 1994 amendment is made to allow for the implementation of Phases II and III of the Master Development Plan. Phases II and III entail the addition of approximately 593,000 square feet to the existing hospital development over a period of five years.
2005	Amendment Adoption (Boundary adjustment and resulting parcel and square footage removal)	The 2005 amendment adjusts the northeastern boundary of the Huntington Memorial Hospital campus to remove parcels at the southwest corner of the intersection of Fair Oaks Avenue and California Boulevard. Potential square footage for medical office building uses on these parcels is also removed from the Master Development Plan.

The currently proposed Master Development Plan Amendment would allow the development of the proposed Emergency Department and Vertical Expansion Project to occur and includes the following:

- Revision of the Master Development Plan site plan to accommodate the Fairmount Avenue realignment and the Hospital Emergency Department and Vertical Expansion;
- An increase in the allowable floor area to accommodate the Expansion; and
- Establishment of a height limit for the Expansion.

During the course of the proposed Project activities, the Hospital Emergency Department would remain open and continue to operate at existing levels. The proposed Emergency Department and Vertical Expansion Project at the Huntington Memorial Hospital would consist of several elements in the following four phases:

- **Phase One** would include the demolition of the medical office building at 47 Congress Street, utility connection staging, and the realignment of Fairmount Avenue between California Street and Congress Street;
- **Phase Two** would include the construction of the new 22,120 square-foot Emergency Department addition, a 16,180 square-foot first-floor addition, 1,170 square-foot first-floor renovation, 16,180 square-foot second-floor addition, and the roof level addition;
- **Phase Three** would include the renovation of the existing Emergency Department; and
- **Phase Four** would include the build out of the radiology and computed tomography (CT) scan rooms on the ground floor.

**Phase One.** The proposed Project includes the demolition of the existing 47 Congress Street one-story building, which is currently used for medical offices. When the leases expire for existing tenants, they would not be renewed, and the tenants would relocate out of the building. Located to the west of the 47 Congress Street medical office building is a small outdoor seating area, surrounded by grass and other landscaping. This area would be removed to accommodate the Hospital Emergency Department and Vertical Expansion

Project. Utility relocation and connection staging activities would be part of this phase of the proposed Project. Additionally, during Phase One construction activities, an existing underground storage tank, which is located near the northeastern corner of the Congress Street/Fairmount Avenue intersection, within the landscaped area, would be removed. The existing tank is an overflow recovery tank and is only filled after it has rained or in the event of a helicopter fuel spill. The tank must be removed, as its current location is within the footprint of the new building construction. A new tank would be placed within the Project boundary in the landscaped area north of the realigned Fairmount Avenue.

Fairmount Avenue between California Street and Congress Street is currently a privately owned, publicly accessible two-way road that is used for access to the Emergency Department as well as through-access to parking lot and structure entrances on Fairmount Avenue immediately south of California Boulevard and Congress Street. As depicted in Figure 3, the proposed Project would realign a portion of Fairmount Avenue north of Congress Street approximately 120 feet to the east to accommodate the Emergency Department expansion. To reduce congestion around the emergency vehicle entrance to the Emergency Department, that portion of Fairmount Avenue would be changed, during non-peak traffic times, to one-way traffic flowing south from the parking structure entrances south of California Boulevard to Congress Street. During peak travel times the realigned portion of Fairmount Avenue would be electronically controlled to maintain two-way traffic.

**Phase Two.** Phase Two of the proposed Project would include the construction of 54,480 square feet of habitable new space.<sup>1</sup> This newly constructed habitable area would include the ground floor, first floor, and second floor. The ground floor would consist of a 22,120 square-foot expansion of the existing Emergency Department, plus a new 4,400 square-foot ambulance drop-off canopy (Figure 3). The first-floor addition would be 16,180 square feet and would be constructed as shell space<sup>2</sup> for possible future expansion of Interventional Suites for catheterization labs and radiological procedures. The second-floor expansion of 16,180 square feet would be constructed as shell space for future expansion of the Surgical Unit.

Also included in the new construction, though not as a habitable area, would be 11,555 square feet on the roof level, which would be used as a mechanical penthouse space for heating, ventilating, and air conditioning (HVAC) equipment and other necessary mechanical equipment. Including this space, total new space constructed would be 66,035 square feet. Table 2 provides a summary of new construction associated with the proposed Project, and Figures 4 and 5 show side elevations of the proposed building expansion.

Table 2 New Construction for Phase One		
Location	Description	Square Feet
Ground Floor	Expansion of Emergency Department	22,120
First Floor	Shell space for possible future expansion of Women's Services or Imaging	16,180
Second Floor	Shell space for possible future expansion of Surgical Unit	16,180
<b>Total</b>		<b>54,480</b>
Roof Level	Mechanical Penthouse	11,555

**Phase Three.** In addition to new construction, the Project includes the renovation of 19,818 square feet of existing space in the Hospital. The existing 15,908 square-foot Emergency Department and 1,710 square feet on the first floor would be renovated as part of the Project.

<sup>1</sup> Although total construction is 66,035 square feet, the mechanical penthouse is not considered to be habitable space and is, therefore, not considered in the total habitable 54,480 square feet of new construction.

<sup>2</sup> Shell space is space that is constructed without improvements or finishes. Shell construction typically denotes the floor, windows, walls, and roof of an enclosed premise and may include some electrical or plumbing improvements but not interior space partitioning.

**Phase Four.** The build out of the 2,200 square-foot Radiology and CT scan rooms would be completed as the final phase of the Project.

The existing Emergency Department is designed to serve approximately 30,000 patients annually, and is presently serving twice that number (approximately 60,000 patients) annually. The Emergency Department and Vertical Expansion Project has an expected patient demand of 65,000 to 75,000 patients during the estimated completion year (2011); however, it is designed to accommodate approximately 90,000 patients annually (Table 3). With the Emergency Department serving more patients annually, an increase in staff of approximately 60 people would occur as a result of the Project.

<b>Factor</b>	<b>Number of Patients Served</b>	<b>Period</b>
Presently designed capacity	30,000	Annually
Number presently serving	60,000	Annually
Proposed Project number anticipated to serve	65,000 to 75,000	Year 2011*
Proposed Project ultimate number expected to serve	90,000	Annually

Note: \*Estimated completion year.

## PROJECT CONSTRUCTION

**Schedule.** Project construction is expected to begin in March 2008 and extend through July 2011. Construction would occur from 7:00 a.m. through 4:00 p.m. Monday through Friday, although construction may occur until as late as 7:00 p.m. Monday through Friday and between 7:00 a.m. and 5:00 p.m. on Saturday, if necessary. Construction would not occur on Sundays or federal holidays.

**Construction Equipment.** The applicant anticipates using a variety of construction equipment on site, as listed in Table 4.

<b>Equipment</b>	<b>Estimated Pieces of Equipment Required for Each Phase</b>		
	<b>Demolition</b>	<b>Site Grading</b>	<b>Building Construction</b>
Bore/Drill Rig	na*	1	na
Concrete/Industrial Saws	1	1	1
Crawler Tractors	1	1	na
Excavators	2	2	na
Graders	1	1	1
Other Equipment	na	1	1
Pavers	1	na	1
Paving Equipment	2	na	1
Rollers	1	na	2
Rough Terrain Forklifts	2	na	na

<b>Table 4 (continued) Construction Equipment</b>			
<b>Equipment</b>	<b>Estimated Pieces of Equipment Required for Each Phase</b>		
	<b>Demolition</b>	<b>Site Grading</b>	<b>Building Construction</b>
Scrapers	na	1	1
Signal Boards	1	1	1
Tractors/Loaders/Backhoes	2	2	1
Trenchers	1	1	na

Note: \*na = not applicable.

**Hospital Access During Construction.** As noted previously, the existing Emergency Department at Huntington Memorial Hospital would remain open throughout the duration of construction, and continuous access would be maintained for emergency vehicles and members of the general public. Because of the importance of maintaining easy access to the Emergency Department, access routes would be well marked with signs and flaggers, as necessary, would direct traffic during construction. Additionally, access to a medical office building planned to be under construction at the southeast corner of California Avenue and Fairmount Avenue would be maintained during the Hospital expansion construction.

**Noise Abatement.** The Project includes a number of measures designed to reduce the potential noise effects of the proposed Hospital expansion on the patients and workers within the existing Hospital complex. These include the installation of temporary sound barriers during the demolition and building construction activities for the Project. The Project would also limit construction activities to between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday, and 8:00 a.m. to 5:00 p.m. on Saturdays. No construction activities would take place on Sundays or federal holidays.

**Dust Abatement.** Dust abatement during construction would be conducted in compliance with South Coast Air Quality Management District Rule 403, Fugitive Dust. Construction activities conducted in compliance with Rule 403 would include watering exposed areas and covering or stabilizing stockpiled soil to ensure that emissions of fugitive dust from any active operation, open storage pile, or disturbed surface area are not visible in the atmosphere beyond the construction site property line. In addition, the construction contractor would be required to use the best available control measures (as listed in Rule 403) to minimize fugitive dust emissions from each fugitive dust source type within the active operation. Project compliance with South Coast Air Quality Management District Rule 403 is considered part of Project design and not a mitigation measure for air quality impacts.

**9. Surrounding Land Uses and Setting:** Adjacent land uses include a three-story medical office building to the east, a medical office building currently under construction to the northeast (at the southwest corner of Fair Oaks Avenue and California Boulevard), and the Huntington Memorial Hospital campus to the north, west, and south.

**10. Other public agencies whose approval is required** (e.g. permits, financing approval, or participation agreement): Various City permits and approvals would be required to approve and implement the proposed Project. These include the following:

- City of Pasadena City Council (approval of the 2007 Master Development Plan Amendment and tree removal permit)
- City of Pasadena Design Commission (review of concept and final design)
- City of Pasadena Hearing Officer (Certificate of Exception)

- City of Pasadena Planning and Development Department/Building Section (demolition permit for 47 Congress Street building and grading permit for street realignment)
- City of Pasadena Planning Commission (review of the 2007 Master Development Plan Amendment and tree removal permit)

Other regulatory agencies and local jurisdictions would also require permits or approvals to construct and operate the proposed Project. These include the following:

- Los Angeles Regional Water Quality Control Board, Region 4 (National Pollutant Discharge Elimination System)
- Office of Statewide Health Planning and Development (review of construction plans and building design, grading permit for building expansion, and building permit for building expansion)

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

	Aesthetics		Geology and Soils		Population and Housing
	Agricultural Resources		Hazards and Hazardous Materials		Public Services
	Air Quality		Hydrology and Water Quality		Recreation
	Biological Resources		Land Use and Planning		Transportation/Traffic
	Cultural Resources		Mineral Resources		Utilities and Service Systems
	Energy		Noise		Mandatory Findings of Significance

**DETERMINATION:** (to be completed by the Lead Agency)

On the basis of this initial evaluation:

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

Sheryl Horn 11/16/07  
*Prepared by/Date*

[Signature] 11/16/07  
*Reviewed by/Date*

Sheryl Horn, HELIX Environmental Planning, Inc.  
*Printed Name*

John Bellas for Jennifer Page-Sacki  
*Printed Name*

Negative Declaration/Mitigated Negative Declaration adopted on: \_\_\_\_\_

Adoption attested to by: \_\_\_\_\_  
*Printed Name/Signature/Date*

## EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
  - 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
  - 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
  - 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 20, "Earlier Analysis," may be cross-referenced).
  - 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. See CEQA Guidelines Section 15063 (c)(3)(D). Earlier analyses are discussed in Section 20 at the end of the checklist.
    - a) Earlier Analysis Used. Identify and state where they are available for review.
    - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    - c) Mitigation Measures. For effects that are "less than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier documents and the extent to which address site-specific conditions for the project.
  - 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
  - 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
  - 8) The explanation of each issue should identify:
    - a) The significance criteria or threshold, if any, used to evaluate each question; and
    - b) The mitigation measure identified, if any, to reduce the impact to less than significant
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## SECTION II - ENVIRONMENTAL CHECKLIST FORM

### 1. BACKGROUND.

Date checklist submitted: November 19, 2007

Department requiring checklist: Planning and Development Department

Case Manager: Erin Clark, Assistant Planner

### 2. ENVIRONMENTAL IMPACTS. (explanations of all answers are required):

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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### 3. AESTHETICS. Would the project:

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

**WHY?** The San Gabriel Mountains are the prevailing visual resource in the City.<sup>3</sup> While the San Gabriel Mountains are visible from most parts of the City, the major view corridors for the mountains are along north-south arterials. The closest north-south arterials in the Project area are Fair Oaks Avenue and Los Robles Avenue; however, the Project is not located adjacent to these arterials. The Project would not obstruct view corridors of the mountains along any north-south arterials.

The proposed building expansion, four stories and 72 feet high, would be attached to the existing seven-story building, which is approximately 126 feet in height with several towers that extend beyond the existing roofline about 18 feet for a total of 144 feet.<sup>4</sup> An existing four-story parking structure is located south of the proposed building expansion south of Congress Street. The building expansion would be slightly smaller than the existing building and of equal scale to the nearby parking structure.

Additionally, the Design Commission would review the design of this Project in accordance with section 17.61.030 of the City's Zoning Code. Although the Project would not significantly affect a scenic vista, this regulatory procedure provides the City with an additional layer of evaluation for aesthetics, and an opportunity to incorporate additional conditions to increase the aesthetic value of the Project.

As the Project is not located within any identified scenic corridors, is similar in scale to surrounding structures, and is subject to the City's design review process, it would not have a substantial adverse effect on a scenic vista. Impacts associated with this issue would be less than significant.

<sup>3</sup> Final Environmental Impact Report (FEIR) Land Use and Mobility Elements of the General Plan, Zoning Code Revisions, and Central District Specific Plan, City of Pasadena, certified 2004, page 133.

<sup>4</sup> The proposed building expansion would be four stories. At 72 feet, it can be assumed that each story would be approximately 18 feet high (72 feet ÷ 4 stories). The seven-story building can be assumed, therefore, to be approximately 126 feet in height (7 stories \* 18 feet), and the tower, with one more story, would be an additional 18 feet (126 feet + 18 feet = 144 feet).

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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b. *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?* ( )

**WHY?** The Angeles Crest Highway (State Highway 2), which is located north of Arroyo Seco Canyon in the extreme northwest portion of the City, is the only designated State scenic highway in the City of Pasadena. The Project site is located over 5.0 miles south of the Angeles Crest Highway and is not within its viewshed. The proposed Project would have no impacts to either State scenic highways or scenic roadway corridors.

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

**WHY?** The proposed Project consists of an expansion of an existing Hospital building. Designed to be consistent in design and scale, the proposed building expansion would be four stories and approximately 72 feet in height. It would be slightly smaller than the existing seven-story building and its taller towers but of equal scale to the nearby four-story parking structure. The Project site is already developed and contains a medical office building, a landscaped outdoor area, and a private road (Fairmount Avenue). As the Project site is already developed, and the proposed expansion has been designed to be consistent with the design and scale of the existing Hospital building, the Project would not substantially degrade the existing visual character of the site.

The Project would be required to comply with City design standards and ordinances, including the City's landscape regulations, the *City Trees and Tree Protection Ordinance*, the Zoning Code, and is subject to review by the Design Commission. Review for approval by the Design Commission was established to ensure that the design, colors, and finish materials of development projects comply with adopted design guidelines and achieve compatibility with the surrounding area. Compliance with City requirements and Project review by the Design Commission would ensure that impacts associated with the visual character or quality of the site would be less than significant.

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

**WHY?** The Project would include removal of existing lights located in the following areas during the construction of the Project:

- Along the portion of Fairmount Avenue to be realigned;
- In the outdoor seating area; and
- Mounted on the building outside the Emergency Department entrance.

Temporary lights for safety and site security would likely be used during the construction period, with the installation of new permanent lights along Fairmount Avenue and outside the Emergency Department prior to the completion of Project construction. After construction, new lights would replace those that were

<b>Potentially Significant Impact</b>	<b>Significant Unless Mitigation is Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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removed. The Project site is surrounded by Hospital and medical office buildings, thus, light from the Project site would not spill over onto any residential uses. Further, the Project would be required to comply with the standards in the Zoning Code (Section 17.40.080, *Outdoor Lighting*) that regulate glare and outdoor lighting. The height and direction of any outdoor lighting must conform to Zoning Code requirements. The proposed exterior lighting would be consistent with the surrounding area. Materials used in the building construction would be similar to those used on the existing Emergency Department building, and does not include any large reflective surfaces that would result in substantial daytime glare. The Project would not cause the creation of new sources of substantial light or glare; therefore, impacts would be less than significant.

**4. AGRICULTURAL RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project.

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

**WHY?** The City of Pasadena is a developed urban area surrounded by hillsides to the north and northwest. The Project site is part of the Huntington Memorial Hospital campus and consists of:

- Existing Emergency Department;
- Fairmount Avenue;
- Outdoor seating area; and
- A one-story medical office building.

The Project site is developed with hospital uses and is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. No impacts associated with the conversion of State designated farmland would occur.

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

**WHY?** The Project site is currently zoned PS (public/semi public) and IG/SP-2 (Industrial/Fair Oaks Specific Plan), and is occupied by hospital uses. The Project site is not designated for agricultural uses, nor does it have any Williamson Act contracts. The development of the Project would not conflict with any existing zoning for agricultural uses or a Williamson Act contract; thus, no impact would occur.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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c. *Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?* ( )

**WHY?** There is no known farmland in the City of Pasadena, and the Project site is already occupied with hospital related uses; therefore, the proposed Project would not result in the conversion of farmland to a non-agricultural use. No impacts would occur.

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

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

**WHY?** The air quality plans that apply to the proposed Project are the South Coast Air Quality Management District (District) Air Quality Management Plan (AQMP)<sup>5</sup> and the West San Gabriel Valley Air Quality Plan (1992).

The City of Pasadena is within the South Coast Air Basin (Basin), which is bounded by the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and the Pacific Ocean to the south and west. The District manages air quality in the Basin, which has a history of recorded air quality violations where both State and Federal ambient air quality standards are exceeded. The California Clean Air Act requires preparation of an AQMP. The District AQMP analyzes air quality on a regional level and, to achieve air quality standards, identifies region-wide attenuation methods, including:

- Regulations for stationary-source polluters;
- Facilitation of new transportation technologies, such as low-emission vehicles; and
- Capital improvements, such as park-and-ride facilities and public transit improvements.

The District has developed the *CEQA Air Quality Handbook* (1993), which identifies two criteria for determining consistency with the District AQMP:

- **Criterion No. 1:** *The proposed Project will not result in an increase in the frequency or severity of existing air quality violations [to California Ambient Air Quality Standards] or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.*
- **Criterion No. 2:** *The proposed Project will not exceed the assumptions in the AQMP in 2013 or increments based on the years of Project build-out phase.*

<sup>5</sup> South Coast Air Quality Management District, *2007 Draft Air Quality Management Plan*, June 2007.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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The proposed Project is not expected to exceed the California Ambient Air Quality Standards for localized criteria pollutants during long-term operational activity. The localized significance threshold (LST) analysis also indicates that the Project would not exceed the California Ambient Air Quality Standards for carbon monoxide (CO, nitrogen dioxide (NO<sub>2</sub>), particulate matter 2.5 to 10 microns in diameter (PM<sub>10</sub>), or particulate matter 2.5 microns or less in diameter (PM<sub>2.5</sub>) during short-term construction activity (after mitigation). Additionally, the proposed Project would not exceed regional thresholds for short-term construction activity (after mitigation) or long-term operational activity (discussed in response 5[b] below). Therefore, the proposed Project is in compliance with Consistency Criterion No. 1.

The 2007 AQMP incorporates growth assumptions generated by Southern California Association of Governments (SCAG). SCAG derives its assumptions, in part, based on the General Plans of cities located within the SCAG region. Therefore, if a project does not exceed growth projections in the General Plan of the local jurisdiction, it would be considered consistent with the growth assumptions in the AQMP. The purpose of the Project is to provide capacity to serve additional patients in the area. The expected increase in patient load would occur as a result of anticipated growth in the area, which has already been planned. The Project itself would not generate a substantial number of jobs or trigger unplanned growth in the area. The Project is being planned in response to anticipated growth in the region. Implementation of the Project would not exceed the growth projections in the General Plan and/or the growth projections established by SCAG for the region, as the Project serves to meet the growing need for emergency services in the area. Thus, the Project is compliant with Consistency Criterion No. 2.

The City of Pasadena participates in the West San Gabriel Valley Air Quality Plan, a sub-regional air quality plan, prepared in 1992. It is intended to be a guide for 16 participating cities, and identifies methods of improving air quality while accommodating expected growth.

As the Project is consistent with growth projections for the area, it would not conflict with the AQMP or the West San Gabriel Valley Air Quality Plan. As such, applicable air quality plan impacts would be less than significant.

b. *Violate any air quality standard or contribute to an existing or projected air quality violation?* (    )

**WHY?** The Air Quality Impact Analysis for the Project<sup>6</sup> is available for review as part of the project file at the City of Pasadena, 175 North Garfield Avenue in Pasadena on Monday through Thursday from 8:00 a.m. to 5:00 p.m. and on Fridays from 8:00 a.m. to noon.

Construction (including demolition and building construction) and operational activities associated with the Project would generate emissions, resulting in localized increased levels of emissions and particulates.

Prevailing winds, from the southwest, carry smog from wide areas of Los Angeles and adjacent cities to the San Fernando Valley and to the City of Pasadena in the San Gabriel Valley, where it is trapped against the foothills. Pasadena is located in a non-attainment area that frequently exceeds national ambient air quality standards for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. As previously discussed, the Project is located within the South Coast Air Basin (Basin) and is within the jurisdiction of the South Coast Air Quality Management District (District).

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<sup>6</sup> *HMH Emergency Department and Vertical Expansion Air Quality Analysis, Urban Crossroads, November 7, 2007.*  
Huntington Memorial Hospital Emergency                      Initial Study                      November 19, 2007                      Page 19  
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<b>Potentially Significant Impact</b>	<b>Significant Unless Mitigation is Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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The District has developed the *CEQA Air Quality Handbook* (1993) that establishes suggested significance thresholds based on the volume of pollution emitted. According to the Handbook, any project in the Basin with daily emissions that exceed any of the following thresholds should be considered to have a significant air quality impact:

**Construction Thresholds**

- 75 pounds per day of volatile organic compounds (VOC);
- 100 pounds per day of oxides of nitrogen (NO<sub>x</sub>);
- 550 pounds per day of carbon monoxide (CO);
- 150 pounds per day of oxides of sulfur (SO<sub>x</sub>);
- 150 pounds per day of particulate matter 2.5 to 10 microns in diameter (PM<sub>10</sub>); and
- 55 pounds per day of particulate matter 2.5 microns or less in diameter (PM<sub>2.5</sub>).

**Operational Thresholds**

- 55 pounds per day of ROC;
- 55 pounds per day of NO<sub>x</sub>;
- 550 pounds per day of CO;
- 150 pounds per day of SO<sub>x</sub>;
- 150 pounds per day of PM<sub>10</sub>; and
- 55 pounds per day of PM<sub>2.5</sub>.

Construction Activities. Construction related emissions from the Project would occur as a result of the following construction activities:

- Demolition;
- Grading;
- Building construction/paving/architectural coatings; and
- Construction workers commuting.

The first three activities (demolition, grading, and building) would not occur concurrently, although emissions from construction workers commuting would be associated with all three of the construction periods.

Tables 5, 6 and 7 provide the peak construction emissions for demolition, grading, and building construction, respectively. Because the emission summaries indicate the emissions on a peak day, and the three construction activities (demolition, grading, and building construction) would be occurring at different times, each construction activity is shown in a separate table.

Potentially Significant Impact
Significant Unless Mitigation is Incorporated
Less Than Significant Impact
No Impact

**Table 5  
Emission Summary of Demolition Activities (pounds/day)**

	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Demolition Fugitive Dust	0	0	0	0	0.08	0.02
Haul Truck Emissions	1.48	18.72	5.72	0.02	0.91	0.80
Demolition Equipment	13.30	90.26	43.27	0.08	5.95	5.47
Demolition Worker Trips	2.65	15.78	21.38	0.02	0.60	0.50
<b>Peak Day Mass Emissions</b>	<b>17.43</b>	<b>124.76</b>	<b>70.36</b>	<b>0.12</b>	<b>7.53</b>	<b>6.79</b>
District* Regional Threshold	75	100	550	150	150	55
<b>Significant</b>	<b>NO</b>	<b>YES</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Note: \* District = South Coast Air Quality Management District.  
 Source: HMM Emergency Department and Vertical Expansion Air Quality Analysis, Urban Crossroads, November 7, 2007, Table 4-2.

**Table 6  
Emission Summary of Grading Activities (pounds /day)**

	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Grading Fugitive Dust	0	0	0	0	1.40	0.30
Haul Truck Emissions	0.42	5.35	1.63	0	0.26	0.23
Grading Equipment	13.64	105.90	47.72	0.10	5.89	5.42
Grading Water Truck	0.02	0.27	0.08	0	0.01	0.01
Grading Worker Trips	2.15	12.82	17.37	0.02	0.48	0.41
<b>Peak Day Mass Emissions</b>	<b>16.24</b>	<b>124.33</b>	<b>66.80</b>	<b>0.12</b>	<b>8.05</b>	<b>6.37</b>
District* Regional Threshold	75	100	550	150	150	55
<b>Significant</b>	<b>NO</b>	<b>YES</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Note: \* District = South Coast Air Quality Management District.  
 Source: HMM Emergency Department and Vertical Expansion Air Quality Analysis, Urban Crossroads, November 7, 2007, Table 4-2.

**Table 7  
Emission Summary of Building Construction Activities (pounds /day)**

	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Paving Off-Gas	0.12	0	0	0	0	0
Building/Paving Equipment Emissions	9.06	67.96	31.30	0.06	3.91	3.60
Worker Trips	1.82	10.85	14.70	0.02	0.41	0.35
Architectural Coating	6.32	0	0	0	0	0
Architectural Coating Worker Trips	1.99	11.83	16.03	0.02	0.45	0.38
<b>Peak Day Mass Emissions</b>	<b>19.31</b>	<b>90.64</b>	<b>62.03</b>	<b>0.10</b>	<b>4.77</b>	<b>4.32</b>
District* Regional Threshold	75	100	550	150	150	55
<b>Significant</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Note: \* District = South Coast Air Quality Management District.  
 Source: HMM Emergency Department and Vertical Expansion Air Quality Analysis, Urban Crossroads, November 7, 2007, Table 4-2.



<b>Potentially Significant Impact</b>	<b>Significant Unless Mitigation is Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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As shown in the previously mentioned Tables 5 through 7, the construction of the proposed Project would not result in emissions exceeding District regional thresholds for VOC, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>; however, emissions of NO<sub>x</sub> would exceed District thresholds during the demolition and grading periods for the Project, resulting in a potentially significant air quality impact. Implementation of mitigation measure **AIR-1** through **AIR-4** would reduce impacts to a less than significant level.

**AIR-1** Prior to issuance of grading permits, the Construction Contractor shall provide evidence to the City of Pasadena showing that the following measures are being implemented to reduce air pollutants generated during Project construction:

- Maintaining equipment engines in good condition and in proper tune according to manufacturer's specifications and during smog season (May through October). No construction equipment shall be left idling for more than five minutes (per California law);
- The application of water on disturbed soils three times per day;
- Stabilizing graded site surfaces upon completion of grading when subsequent development is delayed or expected to be delayed more than thirty days, except when such a delay is due to precipitation that dampens the disturbed surface sufficiently to eliminate visible fugitive dust emissions;
- The Construction Contractor shall prevent Project-related trackout onto paved surfaces and cleanup Project-related trackout or spills on publicly maintained paved surfaces at the end of each day; and
- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 15 mph averaged over a one-hour duration.

**AIR-2** During construction activity, the Construction Contractor shall be required to adhere to District Rule 431.2, which requires the use of diesel fuel with sulfur content of 15 parts per million (ppm) or less by weight.

**AIR-3** The Construction Contractor shall ensure that all off-road heavy-duty construction equipment utilized during construction activity will be California Air Resources Board Tier 3 Certified or better.

**AIR-4** During construction activity, the Construction Contractor shall be required to use only low-polluting paints and coatings as defined in SCAQMD Rule 1113.

With implementation of mitigation measures **AIR-1** through **AIR-4**, NO<sub>x</sub> emissions during construction would be reduced to below the District's threshold (as shown in Tables 8, 9, and 10), resulting in a less than significant impact.

**Table 8  
Emission Summary of Demolition Activities with Mitigation (pounds/day)**

	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Demolition Fugitive Dust	0	0	0	0	0.02	0
Haul Truck Emissions	1.48	18.72	5.72	0.02	0.91	0.80
Demolition Equipment	1.77	25.45	43.27	0	2.69	2.72
Demolition Worker Trips	2.65	15.78	21.38	0.02	0.60	0.50

Potentially Significant Impact
Significant Unless Mitigation is Incorporated
Less Than Significant Impact
No Impact

**Table 8  
Emission Summary of Demolition Activities with Mitigation (pounds/day)**

	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Peak Day Mass Emissions</b>	<b>5.89</b>	<b>59.95</b>	<b>70.36</b>	<b>0.04</b>	<b>4.21</b>	<b>4.02</b>
District* Regional Threshold	75	100	550	150	150	55
<b>Significant</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Note: \* District = South Coast Air Quality Management District.  
Source: *HMH Emergency Department and Vertical Expansion Air Quality Analysis*, Urban Crossroads, November 7, 2007, Table 6-1.

**Table 9  
Emission Summary of Grading Activities with Mitigation (pounds /day)**

	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Grading Fugitive Dust	0	0	0	0	0.55	0.12
Haul Truck Emissions	0.42	5.35	1.63	0	0.26	0.23
Grading Equipment	1.81	29.86	47.72	0.10	2.67	2.69
Grading Water Truck	0.02	0.27	0.08	0	0.01	0.01
Grading Worker Trips	2.15	12.82	17.37	0.02	0.48	0.41
<b>Peak Day Mass Emissions</b>	<b>4.41</b>	<b>48.30</b>	<b>66.80</b>	<b>0.12</b>	<b>3.97</b>	<b>3.45</b>
District* Regional Threshold	75	100	550	150	150	55
<b>Significant</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Note: \* District = South Coast Air Quality Management District.  
Source: *HMH Emergency Department and Vertical Expansion Air Quality Analysis*, Urban Crossroads, November 7, 2007, Table 6-1.

**Table 10  
Emission Summary of Building Construction Activities with Mitigation (pounds /day)**

	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Paving Off-Gas	0.12	0	0	0	0	0
Building/Paving Equipment Emissions	1.20	19.16	31.30	0.06	1.77	1.79
Worker Trips	1.82	10.85	14.70	0.02	0.41	0.35
Architectural Coating	2.43	0	0	0	0	0
Architectural Coating Worker Trips	1.99	11.83	16.03	0.02	0.45	0.38
<b>Peak Day Mass Emissions</b>	<b>7.56</b>	<b>40.85</b>	<b>62.03</b>	<b>0.09</b>	<b>2.63</b>	<b>2.51</b>
District* Regional Threshold	75	100	550	150	150	55
<b>Significant</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Note: \* District = South Coast Air Quality Management District.  
Source: *HMH Emergency Department and Vertical Expansion Air Quality Analysis*, Urban Crossroads, November 7, 2007, Table 6-1.

Potentially Significant Impact
Significant Unless Mitigation is Incorporated
Less Than Significant Impact
No Impact

Operational Activities. Operational activities associated with the proposed project would result in emissions of VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Operational emissions would be expected from the following equipment and activities:

- Vehicle emissions;
- Fugitive dust related to vehicular travel;
- Combustion emissions associated with natural gas use;
- Landscape maintenance equipment emissions; and
- Architectural coatings.

Table 11 identifies operational emissions associated with the Project. As they are below District thresholds, impacts associated with operational emissions would be less than significant.

**Table 11  
Summary of Peak Operational Emissions (pounds /day)**

	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summer</b>						
Vehicle Emissions	4.24	3.75	32.59	0.03	5.59	1.09
Natural Gas Usage	0.03	0.36	0.31	0	0	0
Landscape Maintenance Emissions	0.12	0.02	1.55	0	0.01	0.01
Architectural Coatings	0.32	0	0	0	0	0
<b>Operational Emissions (Summer)</b>	<b>4.71</b>	<b>4.13</b>	<b>34.45</b>	<b>0.03</b>	<b>5.60</b>	<b>1.10</b>
District* Regional Threshold	55	55	550	150	150	55
<b>Significant</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
<b>Winter</b>						
Vehicle Emissions	3.61	4.52	31.36	0.03	5.59	1.09
Natural Gas Usage	0.03	0.36	0.31	0	0	0
Architectural Coatings	0.32	0	0	0	0	0
<b>Operational Emissions (Winter)</b>	<b>3.96</b>	<b>4.88</b>	<b>31.67</b>	<b>0.03</b>	<b>5.59</b>	<b>1.09</b>
District* Regional Threshold	75	100	550	150	150	55
<b>Significant</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Note: \* District = South Coast Air Quality Management District.  
Source: *HMH Emergency Department and Vertical Expansion Air Quality Analysis*, Urban Crossroads, November 7, 2007, Table 4-2.

Localized Significance Thresholds. Localized significance thresholds (LSTs), only applicable to NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>, were calculated for construction and operational emissions. LSTs represent the maximum emissions from a Project that would not be expected to cause or contribute to an exceedance of the most stringent applicable air quality standards, and are developed based on the ambient concentrations of the pollutant for each source receptor area and distance to the nearest sensitive receptor. The nearest sensitive

Potentially Significant Impact
Significant Unless Mitigation is Incorporated
Less Than Significant Impact
No Impact

receptor to the Project site would be patients located within the East Patient Tower of the Hospital, which is the building that houses the Emergency Department.

Tables 12, 13, 14, and 15 provide the emission summaries for construction and operational emissions, compared to the LSTs.

**Table 12  
Localized Significance Summary of Demolition Activities (pounds/day)**

	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Demolition Fugitive Dust	0	0	0.08	0.02
Demolition Equipment	90.26	43.27	5.95	5.47
<b>Peak Day Mass Emissions</b>	<b>90.26</b>	<b>43.27</b>	<b>6.03</b>	<b>5.49</b>
District* Regional Threshold	126	449	4	3
<b>Significant</b>	<b>NO</b>	<b>NO</b>	<b>YES</b>	<b>YES</b>

Note: \* District = South Coast Air Quality Management District.  
Source: *HMH Emergency Department and Vertical Expansion Air Quality Analysis*, Urban Crossroads, November 7, 2007, Table 4-4.

**Table 13  
Localized Significance Summary of Grading Activities (pounds/day)**

	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Grading Fugitive Dust	0	0	1.40	0.30
Grading Equipment	105.90	47.72	5.89	5.42
Grading Water Truck	0.27	0.08	0.01	0.01
<b>Peak Day Mass Emissions</b>	<b>105.90</b>	<b>47.72</b>	<b>7.29</b>	<b>5.72</b>
District* Regional Threshold	126	449	4	3
<b>Significant</b>	<b>NO</b>	<b>NO</b>	<b>YES</b>	<b>YES</b>

Note: \* District = South Coast Air Quality Management District.  
Source: *HMH Emergency Department and Vertical Expansion Air Quality Analysis*, Urban Crossroads, November 7, 2007, Table 4-4.

**Table 14  
Localized Significance Summary of Building Activities (pounds/day)**

	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Building Equipment	67.96	31.30	3.91	3.60
<b>Peak Day Mass Emissions</b>	<b>67.96</b>	<b>31.30</b>	<b>3.91</b>	<b>3.60</b>
District* Regional Threshold	126	449	4	3
<b>Significant</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>YES</b>

Note: \* District = South Coast Air Quality Management District.  
Source: *HMH Emergency Department and Vertical Expansion Air Quality Analysis*, Urban Crossroads, November 7, 2007, Table 4-4.

Potentially Significant Impact
Significant Unless Mitigation is Incorporated
Less Than Significant Impact
No Impact

**Table 15  
Localized Significance Summary of Operational Emissions (pounds/day)**

	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summer</b>				
Vehicle Emissions	0.41	4.29	0.19	0.04
Natural Gas Usage	0.36	0.31	0	0
Landscape Maintenance Emissions	0.02	1.55	0.01	0.01
<b>Operational Emissions (Summer)</b>	<b>0.79</b>	<b>6.15</b>	<b>0.20</b>	<b>0.05</b>
District* Regional Threshold	126	449	4	3
<b>Significant</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
<b>Winter</b>				
Vehicle Emissions	0.48	5.21	0.19	0.04
Natural Gas Usage	0.36	0.31	0	0
<b>Operational Emissions (Winter)</b>	<b>0.84</b>	<b>5.52</b>	<b>0.19</b>	<b>0.04</b>
District* Regional Threshold	126	449	4	3
<b>Significant</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Note: \* District = South Coast Air Quality Management District.

Source: *HMH Emergency Department and Vertical Expansion Air Quality Analysis*, Urban Crossroads, November 7, 2007, Table 4-5.

As shown in the previously mentioned Tables 12 through 14, the Project would exceed District LSTs for PM<sub>10</sub>, and PM<sub>2.5</sub> during demolition and grading activities, and PM<sub>2.5</sub> during building construction. This is a potentially significant impact, requiring mitigation.

Operation of the proposed Project would not exceed any LSTs. Implementation of mitigation measures **AIR-1** through **AIR-4** discussed previously would serve as mitigation to reduce impacts associated with LSTs during construction to a less than significant level.

Tables 16 through 18 provide emissions levels following implementation of mitigation.

**Table 16  
Localized Significance Summary of Demolition Activities with Mitigation (pounds /day)**

	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Demolition Fugitive Dust	0	0	0.02	0
Demolition Equipment	25.45	43.27	2.69	2.72
<b>Peak Day Mass Emissions</b>	<b>25.45</b>	<b>43.27</b>	<b>2.71</b>	<b>2.72</b>
District* Regional Threshold	126	449	4	3
<b>Significant</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Note: \* District = South Coast Air Quality Management District.

Source: *HMH Emergency Department and Vertical Expansion Air Quality Analysis*, Urban Crossroads, November 7, 2007, Table 6-2.

Potentially Significant Impact
Significant Unless Mitigation is Incorporated
Less Than Significant Impact
No Impact

**Table 17  
Localized Significance Summary of Grading Activities with Mitigation (pounds/day)**

	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Grading Fugitive Dust	0	0	0.97	0.20
Grading Equipment	29.86	47.72	2.67	2.69
Grading Water Truck	0.27	0.08	0.01	0.01
<b>Peak Day Mass Emissions</b>	<b>30.13</b>	<b>47.80</b>	<b>3.65</b>	<b>2.90</b>
District* Regional Threshold	126	449	4	3
<b>Significant</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Note: \* District = South Coast Air Quality Management District.

Source: *HMH Emergency Department and Vertical Expansion Air Quality Analysis*, Urban Crossroads, November 7, 2007, Table 6-2.

**Table 18  
Localized Significance Summary of Building Activities with Mitigation (lbs/day)**

	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Building Equipment	19.16	31.30	2.69	2.72
<b>Peak Day Mass Emissions</b>	<b>19.16</b>	<b>31.30</b>	<b>2.69</b>	<b>2.72</b>
District* Regional Threshold	126	449	4	3
<b>Significant</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Note: \* District = South Coast Air Quality Management District.

Source: *HMH Emergency Department and Vertical Expansion Air Quality Analysis*, Urban Crossroads, November 7, 2007, Table 6-2.

CO Hot Spot Analysis. The proposed Project would result in an increase in vehicular trips in the area, and would contribute to congestion at nearby intersections and along roadway segments in the project area. Localized air quality effects would occur when emissions from vehicular traffic increase in the Project vicinity. The primary mobile source pollutant of local concern is CO, which is a direct function of vehicle idling time and thus, traffic flow conditions. CO transport is extremely restricted and disperses rapidly with distance from the source (under normal meteorological conditions). However, under certain extreme meteorological conditions, CO concentrations proximate to a congested roadway or intersection may reach unhealthful levels affecting local sensitive receptors (residents, school children, the elderly, hospital patients, etc). A CO impact analysis for the Project was conducted to assess the localized CO impacts on sensitive receptors that are situated adjacent to congested roadways and intersections.

Three intersections in the Project area were analyzed for CO hotspots based on analysis in the Project's Traffic Impact Study:

- Saint John Avenue at California Boulevard;
- Pasadena Avenue at Bellefontaine Street; and
- Fair Oaks Avenue at California Boulevard.