

Appendix B NOP Comments

Appendices

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DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
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www.dot.ca.gov



*Serious drought.
Help save water!*

November 3, 2015

Mr. Jason Golding
City of Duarte
1600 Huntington Drive
Duarte, CA 91010

RE: City of Hope Campus Plan
Vic. LA-210/PM R35.25
LA-605/PM 23.96
SCH # 2015101047
IGR/CEQA No. 151029AL-NOP

Dear Mr. Golding:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. City of Hope is proposing additions to the existing outpatient (clinic), inpatient (hospital), research, office, industrial, warehouse, and hospitality uses from existing conditions of 1,600,850 gross square feet to 617,850 gross square feet.

We have the following comments when the Level of Service (LOS) is still used to prepare traffic analysis on the State facilities. To assist in evaluating the impacts of this project on State transportation facilities, a traffic study should be prepared prior to preparing the Draft Environmental Impact Report (DEIR). Please refer the project's traffic consultant to Caltrans' traffic study guide Website:

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

Listed below are some elements of what is generally expected in the traffic study:

1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to I-210 and all off ramps at the project vicinity including but not limit to I-210 EB/WB off-ramp (exit 35B) to Buena Vista St., I-605 NB off-ramp to Live Oak Ave., I-605 SB off-ramp (exit 26) to Arrow Hwy. The traffic consultant should work with Caltrans to identify and confirm the final off-ramp study locations prior to the preparation of the traffic study. The traffic study should also analyze the storage for left-turn pocket at off-ramps and to on-ramps.

For this project, the City should conduct an off-ramp queuing analysis utilizing the Highway Capacity Manual (HCM) queuing analysis methodology. The capacity of the off-ramp should be calculated by the actual length of the off-ramp between the terminuses to the gore point with some safety factor or referenced to Highway Design Manual at 23' point (Figure 504.2A Single Lane Freeway Entrance) or any other justified methods. The queue length should be calculated from the traffic counts and the percent of truck assignments (data from Caltrans) to the ramp with a passenger car equivalent factor of 3.0 (worst case scenario). The analyzed result may need to be calibrated with actual signal timing when necessary. It is also recommended that the City determine whether the existing, existing plus project, and project-related plus cumulative traffic are expected to cause long queues on the on and off-ramps.

2. Project travel modeling should be consistent with other regional and local modeling forecasts and travel data. Caltrans uses the indices to verify the results and any differences or inconsistencies must be thoroughly explained. Please submit modeling assumptions for Caltrans review and comment.
3. Trip generation rates for the project should be based on the nationally recognized recommendations contained in "Trip Generation" manual, 9th edition, published by the Institute of Transportation Engineers (ITE).
4. Analysis of ADT, AM and PM peak-hour volumes for both the existing and future conditions in the affected area with and without project. Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions should include build-out of all projects and any plan-horizon years.
5. Include all appropriate traffic volumes. The analysis should include existing traffic, traffic generated by the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments.
6. A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts should also be included. Any mitigation involving transit or Transportation Demand Management (TDM) should be justified and the results conservatively estimated.
7. A fair share contribution toward pre-established or future improvements on the State Highway System is considered acceptable mitigation. (Please see Appendix "B" of the Guide for more information).

Mr. Jason Golding
November 3, 2015
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We look forward to reviewing the traffic study and expect to receive a copy from the State Clearinghouse when the DEIR is completed. Should you wish to expedite the review process or receive early feedback from Caltrans please feel free to send a copy of the DEIR directly to our office.

As mentioned during your telephone conversation on November 2, 2015 with Mr. Alan Lin, project coordinator, Caltrans would like to request a formal scoping meeting to discuss preparation of the traffic impact study, potential traffic direct/cumulative impacts, and possible traffic mitigation for the State facilities.

Caltrans is committed in working with the City to solve traffic congestion on the State facilities. If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 151029AL.

Sincerely,



ALAN LIN
Acting IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

From: **Gustavo Romo** gromo@ci.irwindale.ca.us
Subject: Irwindale comments on City of Hope Campus Plan DEIR NOP (October 2015)
Date: November 16, 2015 at 1:55 PM
To: Jason Golding goldingj@accessduarte.com
Cc: Cathy Huicochea cathyh@ci.irwindale.ca.us, Brandi Jones bjones@ci.irwindale.ca.us, Francisco Carrillo fcarrillo@ci.irwindale.ca.us, William Tam wtam@ci.irwindale.ca.us

Hello Jason,

Please accept this email as our formal comments on the City of Hope Campus Plan DEIR NOP, which are due today.

Comment #1:

The Initial Study references “Commercial” GP land use designation and “C-2 (Heavy Commercial)” zoning as being part of the existing City of Hope designations within the City of Irwindale. As far as we know, these designations are incorrect (e.g., pp 9-11; pp. 49-51, etc.), but we would like to see any maps that may have been found during the preparation of the Initial Study that reference these designations so that we may confirm where this information may have come from.

Comment #2:

In areas that identify the preparation of a traffic study (e.g., p 58), add the following text in between “A traffic study” and “will be conducted”: “A traffic study in accordance with the Traffic Impact Study Guidelines of the Cities of Irwindale and Duarte, and Caltrans, if applicable, will be conducted....”

Comment #3:

Add the City of Irwindale General Plan and Zoning Code under the References section (p. 65-66) of the Initial Study.

This concludes our comments on the Initial Study. Please call me if you have any questions.

Thank you,

Gus Romo
Community Development Director
City of Irwindale
(626) 430-2206
(626) 962-2018 (fax)
gromo@ci.irwindale.ca.us



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

November 10, 2015

Jason Golding
City of Duarte
Community Development Department, Planning Division
1600 Huntington Drive
Duarte, CA 91010

RE: City of Hope Campus Plan-City of Duarte-Notice of Preparation of Draft Environmental Impact Report

Dear Mr. Golding:

Thank you for the opportunity to comment on the Notice of Preparation of the Draft Environmental Impact Report for the proposed City of Hope Community Plan, located primarily in the City of Duarte, with a smaller portion at its eastern and southern edges located in the City of Irwindale. The Plan would provide direction for enhancement and development over a 20-year period of an approximately 116-acre area that contains the existing campus. City of Hope is proposing additions to the existing outpatient (clinic), inpatient (hospital), research office, industrial, warehouse, and hospitality uses. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Metro bus lines 272, 267/264 operate on Duarte Rd, adjacent to the proposed project. One Metro bus stop on the corner of Hope Drive/Duarte Road is directly adjacent to the proposed project. The following comments relate to bus operations and the bus stop:

1. Although the project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus facilities and services that are present. The existing Metro bus stop must be maintained as part of the final project.
2. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus Operations. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines at least 30 days in advance of initiating construction activities. For closures that last more than six months, Metro's Stops and Zones Department will also need to be notified at 213-922-5188, 30 days in advance of initiating construction activities. Other municipal bus may also be impacted and should be included in construction outreach efforts.
3. LACMTA encourages the installation of bus shelters, benches and other amenities that improve the transit rider experience. The City should consider requesting the installation of such amenities as part of the development of the site.

4. Final design of the bus stop and surrounding sidewalk area must be Americans with Disabilities Act (ADA) compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.

Gold Line Foothill Extension

1. The applicant should be aware that this development is adjacent to Metro right of way that contains the alignment for the Gold Line Foothill Extension Phase 2A. The Gold Line Foothill Extension Construction Authority completed construction of the light rail line and has turned the line over to LACMTA for pre-revenue testing prior to opening the line in March 2016.
2. Metro would like the opportunity to review and comment on design documents related to the City of Hope development so that potential impacts to the Metro right of way, rail safety or rail operations can be identified and addressed.
3. Metro would like the opportunity to review and comment on all construction plans and activity that may impact the rail right of way, rail safety or rail operations such as traffic closures, power and/or utility relocations or outages, street modifications, lay-down areas, etc... so that any impacts can be identified and addressed.
4. For more information regarding the Gold Line Foothill Extension, please contact the project manager, Rick Meade at 213-922-7917 or MeadeR@metro.net

Beyond impacts to Metro facilities and operations, LACMTA must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

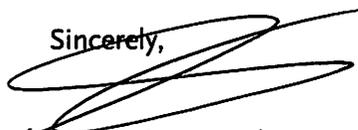
The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

Attachment: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

If you have any questions regarding this response, please contact Elizabeth Carvajal at 213-922-3084 or by email at DevReview@metro.net. LACMTA looks forward to reviewing the Draft EIR. Please send it to the following address:

LACMTA Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952

Sincerely,

A handwritten signature in black ink, appearing to be 'Elizabeth Carvajal', written over a horizontal line.

Elizabeth Carvajal
Transportation Planning Manager

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- Evidence that affected transit operators received the Notice of Preparation.
- A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
 - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
 - For each time period, multiply the result by one of the following factors:
 - 3.5% of Total Person Trips Generated for most cases, except:
 - 10% primarily Residential within 1/4 mile of a CMP transit center
 - 15% primarily Commercial within 1/4 mile of a CMP transit center
 - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
 - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
 - 5% primarily Residential within 1/4 mile of a CMP transit corridor
 - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
 - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

RECEIVED

NOV 05 2015

CITY OF DUARTE

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

November 2, 2015

Jason Golding, Senior Planner
City of Duarte
Planning Division
1600 Huntington Drive
Duarte, CA 91010

Dear Mr. Golding:

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT AND NOTICE OF PUBLIC SCOPING MEETING, "CITY OF HOPE CAMPUS PLAN", SEEKING APPROVAL OF THE CITY OF HOPE CAMPUS PLAN, WHICH THROUGH A COMPREHENSIVE SPECIFIC PLAN, WOULD PROVIDE DIRECTION FOR ENHANCEMENT AND DEVELOPMENT OVER A 20-YEAR PERIOD OF AN APPROXIMATELY 116-ACRE AREA THAT CONTAINS ITS EXISTING CAMPUS, DUARTE (FFER 201500181)

The Notice of Preparation of a Draft Environmental Impact Report and Notice to Public Scoping Meeting has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. We will reserve our comments for the Draft EIR.

LAND DEVELOPMENT UNIT:

GENERAL REQUIREMENTS:

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CARSON	DUARTE	HUNTINGTON PARK	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CERRITOS	EL MONTE	INDUSTRY	LAKEWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CLAREMONT	GARDENA	INGLEWOOD	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	COMMERCE	GLENORA	IRVINDALE	LAWNDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COVINA	HAWAIIAN GARDENS	LA CANADA FLINTRIDGE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	CUDAHY	HAWTHORNE	LA HABRA	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
BRADBURY							WHITTIER

1. The proposed development may necessitate multiple ingress/egress access for the circulation of traffic and emergency response issues.
2. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.
3. This property may be located within the area described by the Forester and Fire Warden as a Very High Fire Hazard Severity Zone (VHFHSZ). All applicable fire code and ordinance requirements for construction, access, water mains, fire hydrants, fire flows, brush clearance, and fuel modification plans must be met.
4. Every building constructed shall be accessible to Fire Department's apparatus by way of access roadways with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.
5. Fire Department's requirements for access, fire flows, and hydrants are addressed during the building permit stage.
6. Approved Automatic Sprinkler Systems in new buildings and structures shall be provided in locations described in Sections 903.2.1 through 903.2.12 of the County of Los Angeles Fire Code.

WATER SYSTEM REQUIREMENTS:

7. The development may require fire flows up to 8,000 gallons per minute at 20 pounds per square inch residual pressure for up to a four-hour duration as outlined in the 2014 County of Los Angeles Fire Code Appendix BB. Final fire flows will be based on the size of buildings, its relationship to other structures, property lines, and types of construction used.
8. Fire hydrant spacing shall be based on fire flow requirements as outlined in the 2014 County of Los Angeles Fire Code Appendix BB. Additional hydrants will be required if hydrant spacing exceeds specified distances.

ACCESS REQUIREMENTS:

9. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning

area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.

10. All on site driveways shall provide a minimum unobstructed width of 28 feet exclusive of shoulders except for approved security gates in accordance with Section 503.6, and an unobstructed vertical clearance "clear o sky" Fire Department's vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Department's vehicular access road is more than 30 feet high or the building is more than three stories. The access roadway shall be located a minimum of 15 feet and a maximum of 30 feet from the building and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial fire apparatus access road is positioned shall be approved by the fire code official. Fire Code 503.1.1 and 503.2.2.
11. The County of Los Angeles Fire Department's Land Development Unit's comments are only general requirements. Specific fire and life safety requirements will be addressed at the building and fire plan check phase. There may be additional requirements during this time.
12. The County of Los Angeles Fire Department's Land Development Unit appreciates the opportunity to comment on this project.
13. The statutory responsibilities of the County of Los Angeles Fire Department's Land Development Unit are to review and comment on all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for firefighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within contract cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities located within non-contract cities. The County of Los Angeles Fire Department's Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.
14. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department's Land Development Unit's Inspector, Claudia Soiza at (323) 890-4243.

Jason Golding, Senior Planner
November 2, 2015
Page 4

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed in the final Environmental Impact Report.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department has no comment or objection to the project at this time.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



KEVIN T. JOHNSON, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

KTJ:ad



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

November 16, 2015

Ref File No.: 3485831

Mr. Jason Golding
Senior Planner
Planning Division
City of Duarte
1600 Huntington Drive
Duarte, CA 91010-2592

Dear Mr. Golding:

Comment Letter for City of Hope Campus Plan

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on October 16, 2015. The proposed development is located within the jurisdictional boundaries of District No. 22. We offer the following comments regarding sewerage service:

1. The proposed project expansion may require an amendment to a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section at (562) 908-4288, extension 2900, in order to reach a determination on this matter. If this update is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction.
2. The wastewater flow originating from the proposed project site is discharging directly to the Districts' Joint Outfall B Unit 8G Trunk Sewer, located in Galen Street at Buena Vista Street. This 15-inch diameter trunk sewer has a design capacity of 3.5 million gallons per day (mgd) and conveyed a peak flow of 0.9 mgd when last measured in 2014. Modifications to the existing sewer connection will require submittal of Sewer Plans for review and approval by the Districts. For additional information, please contact the Districts' Engineering Counter at (562) 908-4288, extension 1205.
3. The wastewater generated by the proposed project will be treated at the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a design capacity of 100 mgd and currently processes an average flow of 69.4 mgd. All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the Joint Water Pollution Control Plant in the City of Carson.

4. In order to estimate the volume of wastewater the project will generate, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link for a copy of the Districts' average wastewater generation factors.
5. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727.
6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

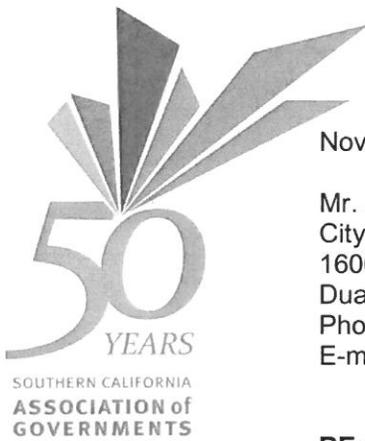
Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: L. Smith
M. Sullivan
M. Tatalovich



November 16, 2015

Mr. Jason Golding, Senior Planner
City of Duarte
1600 Huntington Drive
Duarte, California 91010
Phone: (626) 357-7931
E-mail: goldingj@accessduarte.com

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the City of Hope Campus Plan [SCAG NO. IGR8645]

Main Office
818 West 7th Street
12th Floor
Los Angeles, California
90017-3435
t (213) 236-1800
f (213) 236-1825
www.scag.ca.gov

Dear Mr. Golding,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the City of Hope Campus Plan ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Officers

President
Cheryl Viegas-Walker, El Centro

First Vice President
Michele Martinez, Santa Ana

Second Vice President
Margaret Finlay, Duarte

Immediate Past President
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**Executive/Administration
Committee Chair**

Cheryl Viegas-Walker, El Centro

Policy Committee Chairs

Community, Economic and
Human Development
Bill Jahn, Big Bear Lake

Energy & Environment
Deborah Robertson, Rialto

Transportation
Alan Wapner, San Bernardino
Associated Governments

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the City of Hope Campus Plan in the Los Angeles County. The proposed project is a 20 year plan for approximately 116 acre area that contains the City of Hope National Medical Center existing campus. City of Hope proposes additions to the existing outpatient (clinic), inpatient (hospital), research, office, industrial, warehouse, and hospitality uses.

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to sunl@scag.ca.gov providing, at a minimum, the full public comment period for review. If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Lijin Sun, Esq., Senior Regional Planner, at (213) 236-1882 or sunl@scag.ca.gov. Thank you.

Sincerely,

A handwritten signature in cursive script that reads 'Ping Chang'.

Ping Chang
Program Manager II, Land Use and Environmental Planning

¹ SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR
THE CITY OF HOPE CAMPUS PLAN [SCAG NO. IGR8645]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS.

2012 RTP/SCS GOALS

The SCAG Regional Council adopted the 2012 RTP/SCS in April 2012. The 2012 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see <http://rtpscs.scag.ca.gov>). The goals included in the 2012 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2012 RTP/SCS are the following:

SCAG 2012 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and non-motorized transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format. Suggested format is as follows:

SCAG 2012 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference
etc.	etc.

RTP/SCS STRATEGIES

To achieve the goals of the 2012 RTP/SCS, a wide range of strategies are included in SCS Chapter (starting on page 152) of the RTP/SCS focusing on four key areas: 1) Land Use Actions and Strategies; 2) Transportation Network Actions and Strategies; 3) Transportation Demand Management (TDM) Actions and Strategies and; 4) Transportation System Management (TSM) Actions and Strategies. If applicable to the proposed project, please refer to these strategies as guidance for considering the proposed project within the context of regional goals and policies. To access a listing of the strategies, please visit <http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf> (Tables 4.3 – 4.7, beginning on page 152).

REGIONAL GROWTH FORECASTS

At the time of this letter, the most recently adopted SCAG forecasts, at the jurisdictional level, consists of the 2020 and 2035 RTP/SCS population, household and employment forecasts. To view them, please visit <http://scag.ca.gov/Documents/2012AdoptedGrowthForecastPDF.pdf>. The forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts		Adopted City of Duarte Forecasts	
	Year 2020	Year 2035	Year 2020	Year 2035
Population	19,663,000	22,091,000	25,200	27,200
Households	6,458,000	7,325,000	7,400	7,900
Employment	8,414,000	9,441,000	7,000	7,300

MITIGATION

SCAG staff recommends that you review the SCAG 2012 RTP/SCS Final Program EIR Mitigation Measures for guidance, as appropriate. See Chapter 6 (beginning on page 143) at: <http://rtpscs.scag.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf>

As referenced in Chapter 6, a comprehensive list of example mitigation measures that may be considered as appropriate is included in Appendix G: *Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects*. Appendix G can be accessed at: http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf



South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 ♦ www.aqmd.gov

October 28, 2015

Jason Golding, Senior Planner
City of Duarte
Community Development Department, Planning Division
1600 Huntington Drive
Duarte, CA 91010

RECEIVED

NOV 02 2015

CITY OF DUARTE

**Notice of Preparation of a CEQA Document for the
City of Hope Campus Plan**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the CEQA document upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts

when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4>.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at Jwong1@aqmd.gov or call me at (909) 396-3176.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

LAC151016-02
Control Number

RECEIVED

NOV 09 2015

CITY OF DUARTE



A  Sempra Energy utility

11/02/2015

Mr. Jason Golding
Senior Planner
City of Duarte
Community Development Department, Planning Division
1600 Huntington Drive
Duarte, CA 91010

Re: City of Hope Campus Plan

Dear Mr. Golding:

Southern California Gas Company (SoCalGas) appreciates the opportunity to review and respond to the Notice of Preparation of a Draft Environmental Impact Report. SoCalGas understands that the proposed project would involve a comprehensive specific plan, providing direction for the enhancement and development of the City of Hope campus over a 20 year period. Proposed actions within the plan would include additions to existing buildings on site for uses such as: outpatient clinic, inpatient hospital, research, office, industrial, warehouse, and hospitality. Other project elements include new parking areas, internal roadways, and open space areas. We respectfully request that the following comments be incorporated in the subsequent Draft Environmental Impact Report (DEIR).

- SoCalGas has a medium pressure distribution pipeline extending into the western project area from Cinco Robles Road through parcel number 8533-006-054. SoCalGas recommends that the project proponent call Underground Service Alert at 811 at least two business days prior to performing any excavation work for the proposed project. Underground Service Alert will coordinate with SoCalGas and other Utility owners in the area to mark the locations of buried utility-owned lines.
- Should it be determined that the proposed project may require SoCalGas to abandon and/or relocate or otherwise modify any portion of its existing natural gas lines, SoCalGas respectfully requests that project proponent coordinate with us by calling (800) 427-2000 to follow-up on this matter. In addition, any potential impacts associated with this work should be appropriately considered and addressed in the DEIR.
- SCG recommends that the DEIR include a discussion of activities associated with the extension of new natural gas service. At present, there is no mention of any existing facilities or new facilities that would have to be installed. This additional discussion should include:
 - The presence and condition of existing utility infrastructure on the project site, including right-of-ways and/or easements.

James Chuang
Environmental Specialist

Southern California Gas Company
Sempra Energy utilities
GT17E2
555 Fifth Street
Los Angeles, Ca. 90013
Tel: 213-244-5817
Fax: 323 518 2324

- The number and description of any new natural gas facilities that will have to be constructed or installed, in order to provide natural gas service to the proposed project.
- Identification of any existing natural gas infrastructure that would need to be relocated and/or abandoned, in order to provide natural gas service to the proposed project.
- Identification and description of any temporary areas required for construction and/or staging of material related to new gas service relocation or construction.
- Identification of any actions that would require permitting or acquisition of new right-of-way or easements for natural gas service to the project.
- Any proposed grading and/or drainage improvements that would redirect drainage in a manner that would increase the potential for erosion around SCG facilities.

A discussion of these issues with appropriate diagrams, including specific environmental impact analyses related to these activities, if necessary, may help to reduce the time and cost associated with the extension of new natural gas service to the project.

Once again, we appreciate the opportunity to comment on the Notice of Preparation. If you have any questions, please feel free to contact me at (213) 244-5817 or wcchuang@semprautilities.com.

Sincerely,



James Chuang
Environmental Specialist
Southern California Gas Company

cc. Carli Ewert, SoCalGas



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Notice of Preparation

October 14, 2015

RECEIVED

OCT 19 2015

CITY OF DUARTE

To: Reviewing Agencies

Re: City of Hope Campus Plan
SCH# 2015101047

Attached for your review and comment is the Notice of Preparation (NOP) for the City of Hope Campus Plan draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Jason Golding
City of Duarte
1600 Huntington Drive
Duarte, CA 91010

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base
STATE OF CALIFORNIA**



2015104047
 Governor's Office of Planning and Research
 City of Hope Campus Plan
 Duarte, City of
 State Clearinghouse and Planning Unit



Edmund G. Brown, Jr.
 Governor
Description

type NOP Notice of Preparation

Ken Alex
 Director

The proposed project is the City of Hope Campus Plan, a comprehensive Specific Plan that would provide direction for the enhancement and development of the City of Hope medical campus over a period of 20 years, including the replacement of existing outdated and/or obsolete buildings with modern facilities. Full buildout of the Specific Plan would consist of approximately 1.4 million sf of gross new development (1 million net new sf after demolition of 409,000 sf of existing structures), which would result in a total of 2.6 million sf of developed floor area on the campus. Discretionary approvals required for approval of the proposed project include General Plan Amendments and zone changes in both the City of Duarte and the City of Irwindale.

Lead Agency Contact

Name Jason Golding
Agency City of Duarte
Phone (626) 357-7931 x231 **Fax**
email
Address 1600 Huntington Drive
City Duarte **State** CA **Zip** 91010

Project Location

County Los Angeles
City Duarte, Irwindale
Region
Cross Streets Duarte Road and Village Road
Lat / Long 34° 7' 46" N / 117° 58' 21" W
Parcel No. Multiple
Township 1N **Range** 10W **Section** 31 **Base** SBB&M

Proximity to:

Highways I-210, 605
Airports No
Railways La Metro (Gold Line)
Waterways Santa Fe Flood Control Basin, San Gabriel River
Schools Beardslee ES, Duarte HS
Land Use Multiple

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Cal Fire; Department of Parks and Recreation; Resources, Recycling and Recovery; Department of Water Resources; Department of Fish and Wildlife, Region 5; Office of Emergency Services, California; Native American Heritage Commission; Public Utilities Commission; California Highway Patrol; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4; Statewide Health Planning; San Gabriel & Lower Los Angeles Rivers & Mountains Conservancy

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044

Date Received 10/14/2015 **Start of Review** 10/14/2015 **End of Review** 11/12/2015
 TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

2015101047

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: City of Hope Campus Plan

Lead Agency: City of Duarte

Contact Person: Jason Golding, Senior Planner

Mailing Address: 1600 Huntington Drive

Phone: (626) 357-7931 ex. 231

City: Duarte

Zip: 91010

County: Los Angeles

Project Location: County: Los Angeles

City/Nearest Community: Duarte, Irwindale

Cross Streets: Duarte Road and Village Road

Zip Code: 91010

Longitude/Latitude (degrees, minutes and seconds): 34 ° 7 ' 46 " N / 117 ° 58 ' 21 " W Total Acres: 116

Assessor's Parcel No.: Multiple

Section: 1N

Twp.: 10W

Range: 31

Base: San Bern.

Within 2 Miles: State Hwy #: I-210, I-605

Waterways: Santa Fe Flood Control Basin, San Gabriel River

Airports: None

Railways: LA Metro (Gold Line)

Schools: Beardslee ES, Duarte HS

Document Type:

CEQA: [X] NOP

[] Draft EIR

OCT 1 NEPA

[] NOI

Other: [] Joint Document

[] Early Cons

[] Supplement/Subsequent EIR

[] EA

[] Final Document

[] Neg Dec

(Prior SCH No.)

[] Draft EIS

[] Other:

[] Mit Neg Dec

Other:

STATE CLEARING HOUSE

FONSI

Local Action Type:

[] General Plan Update

[X] Specific Plan

[X] Rezone

[] Annexation

[X] General Plan Amendment

[] Master Plan

[] Prezone

[] Redevelopment

[] General Plan Element

[] Planned Unit Development

[] Use Permit

[] Coastal Permit

[] Community Plan

[] Site Plan

[] Land Division (Subdivision, etc.)

[] Other:

Development Type:

[] Residential: Units

Acres

[] Office: Sq.ft.

Acres

Employees

[] Transportation: Type

[] Commercial: Sq.ft.

Acres

Employees

[] Mining: Mineral

[] Industrial: Sq.ft.

Acres

Employees

[] Power: Type

MW

[] Educational:

[] Waste Treatment: Type

MGD

[] Recreational:

[] Hazardous Waste: Type

[] Water Facilities: Type

MGD

[X] Other: 1.4 million square feet of additional institutional uses

Project Issues Discussed in Document:

[X] Aesthetic/Visual

[] Fiscal

[X] Recreation/Parks

[X] Vegetation

[X] Agricultural Land

[X] Flood Plain/Flooding

[X] Schools/Universities

[X] Water Quality

[X] Air Quality

[X] Forest Land/Fire Hazard

[X] Septic Systems

[X] Water Supply/Groundwater

[X] Archeological/Historical

[X] Geologic/Seismic

[X] Sewer Capacity

[X] Wetland/Riparian

[X] Biological Resources

[X] Minerals

[X] Soil Erosion/Compaction/Grading

[X] Growth Inducement

[] Coastal Zone

[X] Noise

[X] Solid Waste

[X] Land Use

[X] Drainage/Absorption

[X] Population/Housing Balance

[X] Toxic/Hazardous

[X] Cumulative Effects

[X] Economic/Jobs

[X] Public Services/Facilities

[X] Traffic/Circulation

[X] Other: Greenhouse Gases

Present Land Use/Zoning/General Plan Designation:

Multiple designations/zones in the City of Duarte (most of site is "Hospital"); and multiple designations/zones in Irwindale.

Project Description: (please use a separate page if necessary)

The proposed project is the City of Hope Campus Plan, a comprehensive Specific Plan that would provide direction for the enhancement and development of the City of Hope medical campus over a period of 20 years, including the replacement of existing outdated and/or obsolete buildings with modern facilities. Full buildout of the Specific Plan would consist of approximately 1.4 million square feet of gross new development (1 million net new square feet after demolition of 409,000 square feet of existing structures), which would result in a total of 2.6 million square feet of developed floor area on the campus. Discretionary approvals required for approval of the proposed project include General Plan amendments and zone changes in both the City of Duarte and the City of Irwindale.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

TOP Distribution List

- Resources Agency Nadell Gayou
- Dept. of Boating & Waterways Denise Peterson
- California Coastal Commission Elizabeth A. Fuchs
- Colorado River Board Lisa Johansen
- Dept. of Conservation Elizabeth Carpenter
- California Energy Commission Eric Knight
- Cal Fire Dan Foster
- Central Valley Flood Protection Board James Herota
- Office of Historic Preservation Ron Parsons
- Dept of Parks & Recreation Environmental Stewardship Section
- California Department of Resources, Recycling & Recovery Sue O'Leary
- S.F. Bay Conservation & Dev't. Comm. Steve McAdam
- Dept. of Water Resources Agency Nadell Gayou
- Fish and Game
- Dept. of Fish & Wildlife Scott Flint Environmental Services Division
- Fish & Wildlife Region 1 Curt Babcock
- Fish & Wildlife Region 1E Laurie Hamsberger
- Fish & Wildlife Region 2 Jeff Drongesen
- Fish & Wildlife Region 3 Charles Armor
- Fish & Wildlife Region 4 Julie Vance
- Fish & Wildlife Region 5 Leslie Newton-Reed Habitat Conservation Program
- Fish & Wildlife Region 6 Tiffany Ellis Habitat Conservation Program
- Fish & Wildlife Region 6 I/M Heidi Calvert Inyo/Mono. Habitat Conservation Program
- Dept. of Fish & Wildlife M George Isaac Marine Region
- Food & Agriculture Sandra Schubert Dept. of Food and Agriculture
- Dept. of General Services Public School Construction
- Dept. of General Services Anna Garbeff Environmental Services Section
- Delta Stewardship Council Kevan Samsam
- Housing & Comm. Dev. CEQA Coordinator Housing Policy Division
- Independent Commissions/Boards
- Delta Protection Commission Michael Machado
- OES (Office of Emergency Services) Marcia Scully
- Native American Heritage Comm. Debbie Treadway
- Public Utilities Commission Supervisor
- Santa Monica Bay Restoration Guangyu Wang
- State Lands Commission Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA) Cherry Jacques
- Cal State Transportation Agency CalSTA
- Caltrans - Division of Aeronautics Philip Crimmins
- Caltrans - Planning HQ LD-IGR Terri Pencovic
- California Highway Patrol Suzann Ikeuchi Office of Special Projects
- Dept. of Transportation Rex Jackman
- Caltrans, District 1
- Caltrans, District 2 Marcelino Gonzalez
- Caltrans, District 3 Eric Federicks - South Susan Zanchi - North
- Caltrans, District 4 Patricia Maurice
- Caltrans, District 5 Larry Newland
- Caltrans, District 6 Michael Navarro
- Caltrans, District 7 Dianna Watson
- Caltrans, District 8 Mark Roberts
- Caltrans, District 9 Gayle Rosander
- Caltrans, District 10 Tom Dumas
- Caltrans, District 11 Jacob Armstrong
- Caltrans, District 12 Maureen El Harake
- Air Resources Board All Other Projects Cathi Slaminski
- Transportation Projects Nesamani Kalandyur
- Industrial/Energy Projects Mike Tollstrup
- State Water Resources Control Board Regional Programs Unit Division of Financial Assistance
- State Water Resources Control Board Karen Larsen Division of Drinking Water
- State Water Resources Control Board Student Intern, 401 Water Quality Certification Unit Division of Water Quality
- State Water Resources Control Board Phil Crader Division of Water Rights
- Dept. of Toxic Substances Control CEQA Tracking Center
- Department of Pesticide Regulation CEQA Coordinator
- RWQCB 1 Cathleen Hudson North Coast Region (1)
- RWQCB 2 Environmental Document Coordinator San Francisco Bay Region (2)
- RWQCB 3 Central Coast Region (3)
- RWQCB 4 Teresa Rodgers Los Angeles Region (4)
- RWQCB 5S Central Valley Region (5)
- RWQCB 5F Central Valley Region (5) Fresno Branch Office
- RWQCB 5R Central Valley Region (5) Redding Branch Office
- RWQCB 6 Lahontan Region (6)
- RWQCB 6V Lahontan Region (6) Victorville Branch Office
- RWQCB 7 Colorado River Basin Region (7)
- RWQCB 8 Santa Ana Region (8)
- RWQCB 9 San Diego Region (9)
- Other Office of Statewide Health, Planning & Development
- San Gabriel and Lower Conservancy L.A. Rivers and Mountains

Date: Oct. 19. 2015

To: Duarte City Council

From: Arlene Miller
2703 Starpine Dr.
Duarte, CA 91010

Re: City of Hope

I am writing to express my (and our family's support) for facility expansion at the City of Hope.

Myself and another family member have benefitted from the cancer treatment offered at City of Hope.

Because the illness and treatments may cause a person to feel poorly, it is very helpful to have access to get around. It is a large facility and seems much bigger when needing to get around and not having much strength.

I support the City of Hope's efforts to help the patients and families of patients in this way.

Thank you.

A handwritten signature in cursive script that reads "Arlene Miller". The signature is written in black ink and is positioned below the typed name.