## **APPENDIX A**

# NOTICE OF PREPARATION INITIAL STUDY PUBLIC SCOPING COMMENTS

## **APPENDIX A**

## APPENDIX A-1 NOTICE OF PREPARATION (NOP)

#### DEPARTMENT OF CITY PLANNING

200 N. Spring Street, Room 750 Los Angeles, CA 90012-4801

CITY PLANNING COMMISSION

JANE ELLISON USHER PRESIDENT
WILLIAM ROSCHEN VICE-PRESIDENT
DIEGO CARDOSO REGINA M. FREER ROBIN R. HUGHES FR. SPENCER T. KEZIOS CINDY MONTAÑEZ MICHAEL K. WOO

GABRIELE WILLIAMS
COMMISSION EXECUTIVE ASSISTANT
(213) 978-1300

#### CITY OF LOS ANGELES

CALIFORNIA



ANTONIO R. VILLARAIGOSA

**EXECUTIVE OFFICES** 

S. GAIL GOLDBERG, AICP DIRECTOR (213) 978-1271

JOHN M. DUGAN, AICP DEPUTY DIRECTOR (213) 978-1274

EVA YUAN-MCDANIEL DEPUTY DIRECTOR (213) 978-1273

FAX: (213) 978-1275

INFORMATION (213) 978-1270 www.planning.lacity.org

March 7, 2008

## NOTICE OF PREPARATION and PUBLIC SCOPING MEETING ENVIRONMENTAL IMPACT REPORT

EIR NO.:

ENV 2008-0620-EIR

PROJECT NAME:

Cedars-Sinai Medical Center

PROJECT ADDRESS:

8720 Beverly Boulevard, Los Angeles, CA

COMMUNITY PLAN:

Wilshire

**COUNCIL DISTRICT:** 

5 (Jack Weiss)

**DUE DATE FOR PUBLIC COMMENTS: Monday, April 7, 2008** 

SCOPING MEETING: An informational scoping meeting and workshop will be held to receive public comments regarding the appropriate scope and content of the environmental information to be included in the Draft Environmental Impact Report (Draft EIR). The meeting will be in an open house format, with various stations and display boards provided for questions, and comment forms provided for input. The public scoping meeting for this project will be held on:

Date:

Thursday, March 27, 2008

Time:

6:00 p.m. to 8:00 p.m.

Location:

Cedars-Sinai Medical Center, Harvey Morse Conference Center

8700 Gracie Allen Drive, Plaza Level

Los Angeles, CA 90048

Parking:

Validated parking will be available in Parking Structure No. 4 and

Parking Lot No. 7 (see map)

PROJECT DESCRIPTION: The Cedars-Sinai Medical Center (CSMC or the "Applicant") proposes to develop a new inpatient/medical support facility (the "Project") on the CSMC Campus. The Project would be located on approximately two acres at the northwest corner of Gracie Allen Drive and George Burns Road (the "Project Site"), which is currently occupied by an approximately 90,000 square foot, two-story existing building at 8723 Alden Drive (the "Existing Building") and an adjacent surface-level visitor parking lot. The Project consists of the proposed demolition and construction at the Project Site, as well as the "net" operational increase in development to the CSMC Campus, defined as the addition of 200,000 square feet of development rights to the existing CSMC Master Plan and Development Agreement with the City of Los Angeles<sup>1</sup>, and all associated entitlements and permits.

<sup>&</sup>lt;sup>1</sup> The Project Site is part of the CSMC Master Plan and Development Agreement (Ordinance Nos. 168,847 and 168,848, respectively), which were approved in 1993. These documents provide for a comprehensive modernization and expansion program for the entire CSMC Campus. Authorized development under the Master Plan is approximately 700,000 square feet, of which approximately 512,350 square feet has already been developed or planned for development, leaving approximately 187,650 square feet of available remaining development rights.





The additional 200,000 square feet of expansion entitlement requested for the Project will be accommodated at the CSMC Campus at the current location of and through the demolition of the existing 90,000 square foot Existing Building and an adjacent surface parking lot, and the subsequent construction of an 11-story building (the "West Tower") to consist of approximately 477,650 square feet of net floor area (approximately 549,300 square feet of gross floor area) and associated parking. Of the total floor area, 200,000 square feet would be new net additional floor area under this current Project proposal; the other 277,650 square feet comprise 90,000 net square feet transferred from the demolition of the Existing Building and 187,650 square feet previously approved and vested under the 1993 Master Plan.

#### **Summary of Development Entitlements**

Already Developed or Planned	512,350 sq. ft.	Entitlement Transfer from Demolition of Existing Building	90,000 sq. ft.
Remaining Entitlements from Existing Master Plan	187,650 sq. ft.	Remaining Entitlements from Existing Master Plan	187,650 sq. ft.
, , , , , , , , , , , , , , , , , , , ,		Proposed Additional Entitlements	200,000 sq. ft.
Existing Entitlements under Master Plan	700,000 sq. ft.	<b>Proposed</b> New Building	477,650 sq. ft.

The West Tower will be used for medical purposes, including inpatient services, medical suites, research, administrative and diagnostic/ER space. The Project will also include an attached seven-level parking structure (three subterranean, one at grade, and three above grade) to provide approximately 700 parking spaces.

With the exception of an amendment to incorporate the additional net 200,000 square feet (or approximately 230,000 gross square feet) of medical service floor area for the West Tower, the Project would be built in conjunction with the ongoing implementation of the 1993 Master Plan. To accommodate construction of the Project as proposed, the following legislative or discretionary approvals are anticipated for the conceptual planning and implementation phases of the Project:

- Zone Change to change the conditions of the current [T][Q]C2-2D-O zoning designation;
- Height District Change to change the permitted floor area ratio (FAR) of 2.46:1 to 2.71:1;
- Amendment to the existing Development Agreement to permit an additional 200,000 square feet of medical center uses and parking;
- Haul Route Permit;
- B-Permit for necessary street, sewer, storm drain, and lighting improvements;
- Grading Permits;
- Demolition Permits;
- Building Permits;
- · OSHPD approvals and licenses; and
- Any other necessary discretionary or ministerial permits and approvals required for the construction or operation of the Project.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The original 1993 Master Plan and Development Agreement approvals were evaluated in an environmental impact report (the "Original EIR") for the Cedars-Sinai Campus Master Plan (EIR No. 90-0643-ZC-HD). The current Project environmental review considers the physical construction effects due to the proposed demolition and construction at the Project Site, and the net change in operational characteristics due to the addition of 200,000 net square feet of medical center uses. Specifically, under the current Project environmental review, 200,000 square feet of the total 477,650 square feet of Project construction would be new floor

area; the other 277,650 square feet are comprise 90,000 square feet from the Existing Building (proposed for demolition) and 187,650 square feet remaining entitlement from the Master Plan. All of the square footage except the new 200,000 square feet was analyzed by the Original EIR. The Project EIR will analyze the net change in land use, as well as the demolition and construction related impacts associated with the West Tower building.

An Initial Study was completed to determine the areas of focus for the Project EIR. The following issues will be included in the Project EIR: Aesthetics, Air Quality, Noise, and Transportation/Traffic. All other environmental issues have been found to be less than significant and will be addressed in summary fashion under the Impacts Found to be Less Than Significant Section of the Project EIR.

You are being notified of the City of Los Angeles' intent, as Lead Agency, to prepare an EIR for the Project as discussed above, because the Project is located in an area of interest to you and/or the organization you represent. The attached materials comprise a map showing the location of the scoping meeting, a site plan of the proposed Project, a radius map showing all properties within 500 feet of the Project site, and a vicinity map showing the location of the Project site.

The Environmental Review Section welcomes your comments regarding environmental impacts of the Project that you believe are relevant for inclusion in the Project EIR. Written comments must be submitted to this office by 5:00 p.m. on Monday, April 7, 2008.

Please direct your comments to:

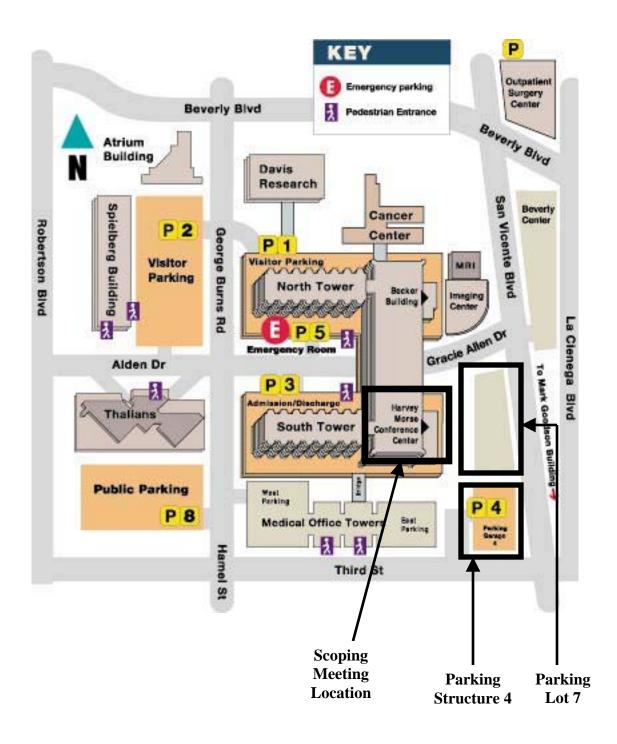
Adam Villani Environmental Review Section Department of City Planning 200 N. Spring Street, Room 750 Los Angeles, CA 90012 (213) 978-1343 (fax) Adam.Villani@lacity.org

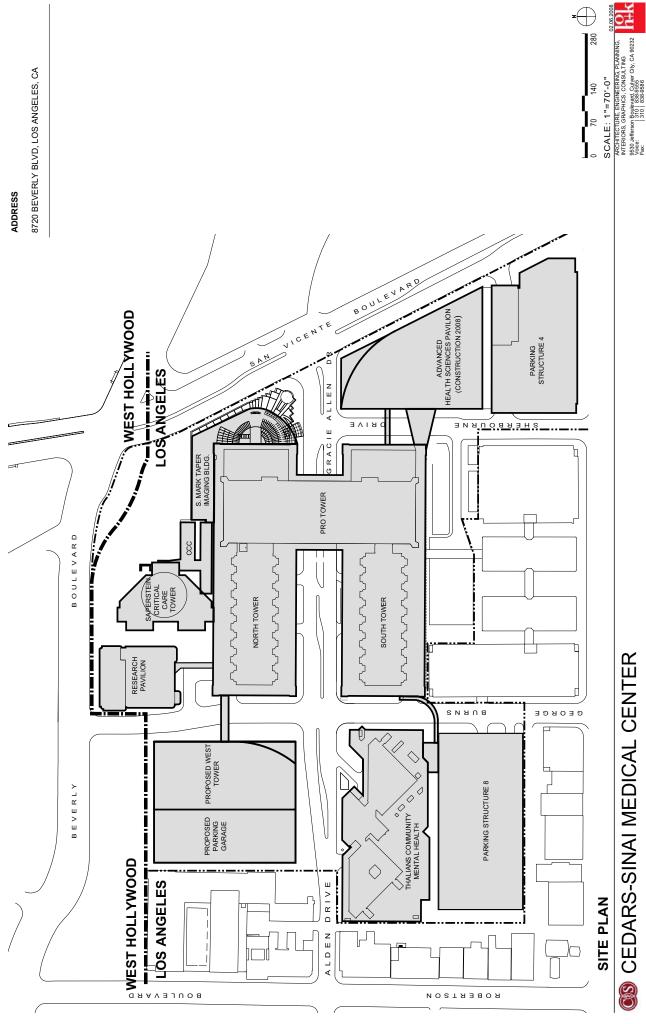
S. Gail Goldberg, AICP Director of Planning

Adam Villani

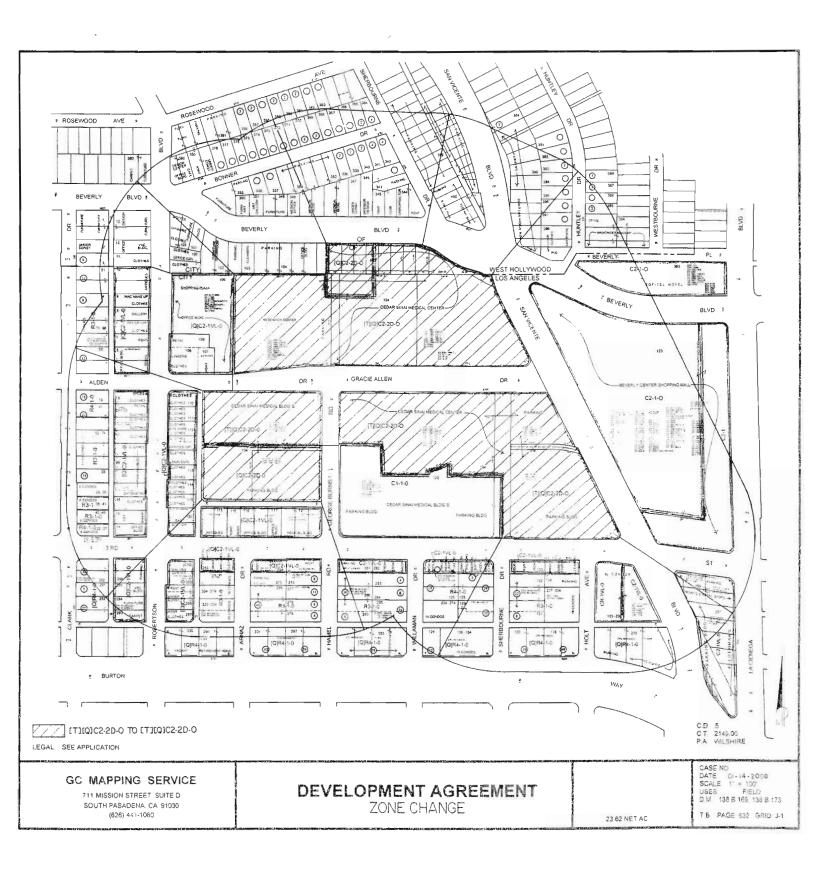
**Environmental Review Coordinator** 

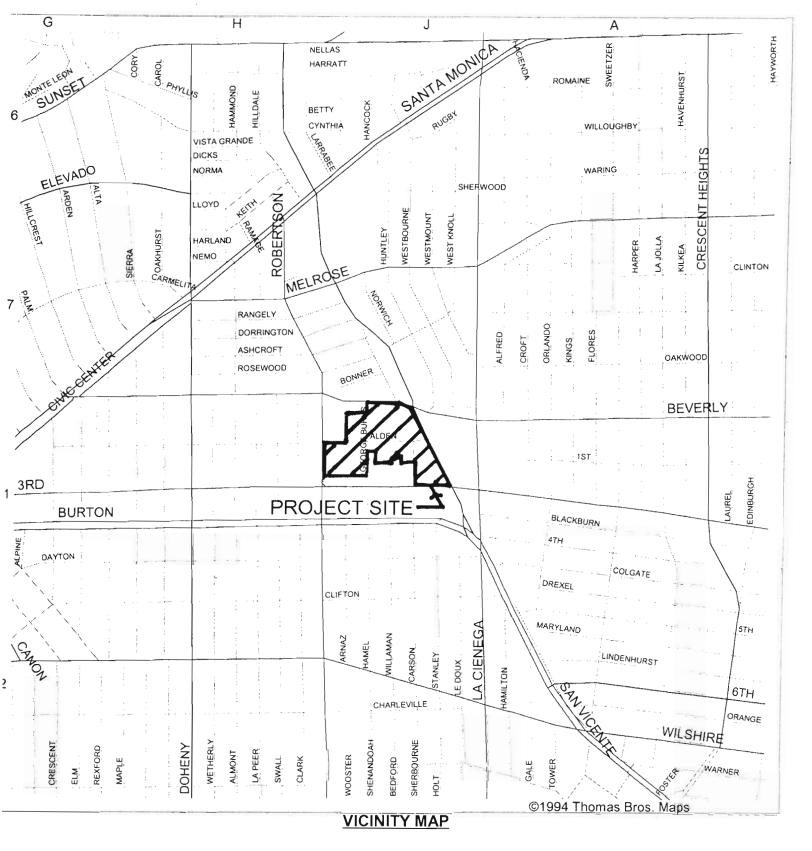
#### SCOPING MEETING LOCATION AND PARKING











SITE: 8720 BEVERLY BLVD.

PLANNING ASSOCIATES, INC. 4040 VINELAND AVENUE #108 STUDIO CITY CA 91604 (818) 487-6767

## **APPENDIX A**

## APPENDIX A-2 INITIAL STUDY



(Article I - City CEQA Guidelines)

Council District: District 5 Date: March 7, 2008

**Lead City Agency:** City of Los Angeles, Department of Planning

Project Title: Cedars-Sinai Medical Center: Additional Development

**Rights** 

#### I. PROJECT DESCRIPTION

#### A. Location

The proposed project (the "Project") is located within the Cedars-Sinai Medical Center ("CSMC") main campus (the "CSMC Campus" or the "Property"), which is comprised of approximately 24.1 net acres and located at 8720 Beverly Boulevard in the Wilshire Community Plan Area of the City of Los Angeles. The CSMC Campus, roughly square in shape, is generally bounded by Beverly Boulevard to the north, San Vicente Boulevard to the east, Third Street to the south, and Robertson Boulevard to the west (see Exhibit 1, Regional Location Map). The CSMC Campus contains an internal network of vacated private streets, including George Burns Road, Sherbourne Drive, and Gracie Allen Drive, which provide access to facilities within the CSMC Campus. Specifically, the Project is proposed on approximately 2.65 net acres at the northwest corner of Gracie Allen Drive and George Burns Road (the "Project Site"), which is currently occupied by a 90,000 square-foot, two-story medical service building (the "Existing Building") and a surface-level, visitor parking lot ("Existing Parking Lot") (see Exhibit 2, Local Vicinity Map).

Uses surrounding the CSMC Campus include medical buildings located to the south and connected to the CSMC Campus by a bridge, containing several CSMC programs but not owned by CSMC (the "Applicant"); commercial and residential uses to the north, east, and west; and the City of West Hollywood border to the north. Several commercial uses are located directly adjacent to the western and southern edges of the CSMC Campus. The Beverly Center shopping complex is directly east of the campus, across San Vicente Boulevard.

#### B. Background

In August of 1993, the City of Los Angeles (the "City") approved a Master Plan for the CSMC Campus (the "Master Plan"), allowing 700,000 square feet of floor area<sup>1</sup> of additional development

<sup>1 &</sup>quot;Floor area" (square feet or "sf") is calculated as defined in Los Angeles Municipal Code Section 12.03. Floor area is that area in square feet confined within the exterior walls of a building but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement

## INITIAL STUDY DEPARTMENT OF CITY PLANNING

to the established CSMC at the Property. The City approved the Master Plan through a Zone Change and Height District Change ordinance (City Council Ordinance 168847, CPC No. 87-759-ZC, CPC No. 87-760-HD) (the "Zone Change"). The City also entered into a Development Agreement with CSMC that vested development of 700,000 square feet of entitlement for 15 years, until August 2008 (City Council Ordinance 168848, CPC No. 92-0530-ZC, CPC No. 92-0533-HD, CPC No. 92-0534-DA), and certified an environmental impact report (the "Original EIR") for the expansion of the CSMC Campus (EIR No. 90-0643-ZC-HD).

On August 10, 2007 the City approved an amendment to the Development Agreement to extend the term of the 700,000 square feet of entitlements under the Development Agreement for an additional 15 years, until August 11, 2023 (City Council Ordinance 178866, CPC No. 1992-534-DA-M1).

As a result of the damage incurred to the Property by the 1994 Northridge earthquake, CSMC focused its development efforts on reconstructing buildings damaged in the earthquake, rather than on implementation of the comprehensive development scheme permitted through the Master Plan. To date, CSMC has completed a number of infill projects (totaling approximately 73,501 square feet) approved under the Master Plan.

In 2008 CSMC anticipates initiating construction of the Advanced Health Sciences Pavilion (the "Pavilion") on a site within the CSMC Campus, just south of Gracie Allen Drive between Sherbourne Drive and San Vicente Boulevard, pursuant to the Master Plan. A total of 187,650 square feet of development rights will remain under the Master Plan after construction of the Pavilion. The 187,650 square feet of residual development rights were fully analyzed in the Original EIR.

#### C. <u>Purpose</u>

The Applicant proposes a Master Plan Amendment, to address expansion of existing CSMC Campus facilities, through a Zone Change, Height District Change, and amendment to the adopted Development Agreement to add 100 new inpatient beds and ancillary services (equivalent to an additional 200,000 square feet of floor area), to serve the growing demand for medical services as the area's population increases and to accommodate updated medical technologies at the CSMC Campus. The Project is intended to serve the growing demand for medical services as the area's population increases, as well as to accommodate updated medical technologies and increase efficiency within the CSMC Campus. To attain these objectives, the Applicant requests approval of the Project to add 100 new inpatient beds (equivalent to 200,000 square feet of floor area for new medical uses) within a proposed 477,650 square-foot building (the "West Tower") located at the Project Site. The West Tower would be comprised of 200,000 square feet of floor area pursuant to this application, 187,650 square feet of previously approved and vested development remaining (but not yet built) under the previous Master Plan entitlement, and 90,000 square feet of floor area offset from the Existing Building to be demolished and incorporated into the West Tower. The purpose of the Project is to accommodate new inpatient uses at the CSMC Campus. The Project seeks to accomplish the following:

- The continued provision of medical services and research of the existing CSMC;
- The expansion of inpatient services (including a range of inpatient diagnostic and treatment facilities, research facilities, medical suites, and administrative space) within the CSMC Campus, and specifically at the Project Site; and
- The provision of additional parking to accommodate the expanded inpatient services.

storage areas (Added by Ordinance No. 163,617, effective 6/21/1988).

#### D. Project Description

The Initial Study considers the physical construction effects due to the proposed demolition and construction at the Project Site, as well as the "net" operational change of uses, defined as the addition of 200,000 square feet of development rights to the existing CSMC Master Plan and Development Agreement with the City of Los Angeles, along with all associated entitlements and permits. The proposed demolition at the Project Site will consist of the existing 90,000 square-foot Existing Building and the Existing Parking Lot, which will accommodate development of the new West Tower with associated parking (see Exhibit 3, Site Plan). The West Tower will utilize the 90,000 square feet of floor area transferred from the Existing Building and the 187,650 square feet of development rights remaining under the Master Plan (both of which have already been analyzed for environmental impacts in previous environmental documents), plus the 200,000 square feet (or the equivalent of 100 inpatient beds of new entitlement), thereby accounting for a total building size of 477,650 square feet of new construction.

<u>Project Characteristics</u> - With the additional 100 inpatient beds (200,000 square feet of development entitlement) proposed by the Project, the Applicant plans to build a facility that is 477,650 square feet in floor area (i.e., the West Tower), along with an adjoining 7-level (700 space) parking structure. Specifically, only 200,000 square feet of the total 477,650 square feet of the new construction would be "new" floor area not previously approved under existing entitlements. The remaining floor area comprising the West Tower will come from the residual 187,650 square feet of previously approved and vested development remaining under the Master Plan (after completion of the Pavilion), and 90,000 square feet "credit" from the Existing Building (after it is demolished).

The 100 new inpatient beds will be contained in the West Tower, which is anticipated to be 11 stories and 185 feet high, to be used for medical purposes. The attached 7-level parking structure, to include three subterranean levels, one level at grade and three levels above grade, would provide 700 parking spaces.

Certain components of the West Tower and the 700-space parking structure have already been analyzed in the Original EIR. Although the Existing Parking Lot will be demolished to accommodate the West Tower, that demolition was approved in 1993 as part of the Master Plan and Original EIR, and therefore is not part of the Project. Landscaping and hardscape (i.e., sidewalks, plazas and planter walls), directional and tenant signage, and security, ambient and accent lighting would be installed for the West Tower, but these components were also previously approved in the Original EIR.

In summary, the Project consists of the following elements:

- Addition of 100 new inpatient beds and ancillary services (200,000 square feet
  of floor area for medical center uses), to be combined with the residual 187,650
  square feet previously approved and vested by the Master Plan and
  Development Agreement and 90,000 square feet from the Existing Building, to
  construct the new West Tower, with a pedestrian bridge connection to the
  adjacent North Tower;
- Demolition of the 90,000 square-foot Existing Building and adjacent Existing Parking Lot; and
- Construction of a 7-level (700 space) adjoining parking structure.

### INITIAL STUDY DEPARTMENT OF CITY PLANNING

<u>Project Approvals</u> - The following approvals are anticipated for the conceptual planning and implementation phases of the Project:

- Zone Change to amend the conditions of the [T][Q]C2-2D-O zoning designation to approve an additional 100 inpatient beds and ancillary services (or the equivalent of 200,000 square feet of floor area) of development entitlement;
- Height District Change to change the permitted floor area ratio (FAR) of 2.46:1 to 2.71:1;
- Amendments to the existing Development Agreement and Master Plan to permit an additional 100 inpatient beds and ancillary services (or the equivalent of 200,000 square feet of floor area for medical uses) and related parking;
- Haul Route Permit;
- B-Permit for necessary street, sewer, storm drain, and lighting improvements;
- · Grading Permits;
- Demolition Permits;
- Building Permits;
- · OSHPD approvals and licenses; and
- Any other necessary discretionary or ministerial permits and approvals required for the construction or operation of the Project.

<u>Project Schedule</u> - Although an exact construction schedule is not known at this time, pursuant to the existing Development Agreement and proposed Amendment, the new West Tower is anticipated to be operational by year 2023. Demolition and construction of the new building is anticipated to take approximately 36 months.

Project Assumptions - The review in this Initial Study assumes that, unless otherwise stated, the Project will be designed, constructed and operated following all applicable laws, regulations, ordinances and formally adopted City standards (e.g., Los Angeles Municipal Code and Bureau of Engineering Standard Plans). The proposed new building will include inpatient uses, therefore, the Office of Statewide Health Planning and Development (OSHPD), not the City of Los Angeles, has jurisdiction over building permits and related permits. The proposed new building will comply with all applicable statewide regulations. It is also assumed that construction will follow the uniform practices established by the Southern California Chapter of the American Public Works Association (e.g., Standard Specifications for Public Works Construction and the Work Area Traffic Control Handbook) as specifically adapted by the City of Los Angeles (e.g., The City of Los Angeles Department of Public Works Additions and Amendments to the Standard Specifications For Public Works Construction (AKA "The Brown Book," formerly Standard Plan S-610)). As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services, and activities. Pursuant to state statutes and regulations, the facility will comply with all applicable OSHPD regulations.

#### II. EXISTING ENVIRONMENT

The Project Site is part of the CSMC Campus, which is surrounded by a mix of CSMC and commercial uses, including CSMC medical-related uses on George Burns Road and Gracie Allen Drive and commercial uses on Beverly Boulevard and Robertson Boulevard. Current uses on the Project Site consist of the Existing Building and the Existing Parking Lot. The Existing Building consists of approximately 90,000 square feet of medical support facilities. The CSMC Campus is

## INITIAL STUDY DEPARTMENT OF CITY PLANNING

comprised of 24.1 net (or approximately 26 gross) acres and includes approximately 1.8 million square feet of hospital and hospital-related uses. The 11-story Pavilion building, which is currently in the building permit phase, contains 379,000 square feet of floor area and is anticipated to be complete by the end of year 2011 (construction beginning in 2008). Completion of the Pavilion would increase total floor area on the CSMC Campus Property to approximately 2.2 million square feet.

The Project Site and surrounding area is characterized as urbanized, with a mix of moderately dense medical, commercial and residential uses. The Project Site and all surrounding properties have undergone disturbance previously resulting from development of the existing medical and commercial uses.

#### III. ENVIRONMENTAL EFFECTS

#### A. Criteria

The two sets of criteria, screening and significance criteria, found in the *L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles (Thresholds Guide)* will be used to evaluate the potential for project impacts in this Initial Study. The screening criteria are used to determine whether a significant impact could potentially occur and/or whether further study is needed. The significance criteria are also used to evaluate the anticipated level of impact, and hence focus the area of issues to be addressed through further study.

An Environmental Impact Report (EIR) was previously prepared to address approval and development of 700,000 square feet of CMSC Campus uses under the Master Plan. The Original EIR was certified (EIR No. 90-0643-ZC-HD) and forms the basis of this Initial Study review for characterizing the "net" impact for the additional 200,000 square feet of medical uses comprising the Project. The Original EIR is hereby incorporated by reference.

Pursuant to CEQA Guidelines Section 15063, the analysis in this Initial Study for the Project will be used to: 1) provide the Lead Agency with information for deciding whether to prepare an EIR; 2) assist in the preparation of an EIR (if required) by focusing the EIR on effects determined to be potentially significant, identifying effects determined not to be significant, and explaining the reasons for those determinations; 3) identify what type of EIR (i.e., Supplemental EIR) process would be appropriate; and 4) determine whether a previously prepared EIR (i.e., the Original EIR) could be used to support the Project.

In accordance with CEQA Guidelines Sections 15162 and 15163, this Initial Study also considers whether the Project's proposed revisions to the approved Master Plan would: 1) require major revisions to the Original EIR, because the Project would create either new significant environmental impacts not previously studies in the Original EIR or a substantial increase in the severity of any significant impact previously identified in the Original EIR; or 2) substantially change the circumstances under which the Master Plan is undertaken so as to require major revisions of the Original EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or 3) whether new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Original EIR was certified as complete, meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

#### B. References

## INITIAL STUDY DEPARTMENT OF CITY PLANNING

Sources of information that adequately support findings of no or less than significant impact are referenced by number following each question in Section III. Answers to questions not addressed specifically by an applicable reference are discussed in the comment section.

#### **General Regulatory and Planning Documents**

- 1. California Building Standards Commission, 1994. <u>Uniform Building Code</u>, [California Code of Regulations, Title 24, Part 2]. Table 18-1-B.
- 2. <u>California Code of Regulations</u>, Section 15064.5 "Determining the Significance of Impacts to Archeological and Historical Resources."
- 3. California Dept. of Conservation, Div. of Mines and Geology. California Geological Survey. Alquist-Priolo Earthquake Fault Zones.
- 4. California Dept. of Conservation. Farmland Mapping & Monitoring Program.
- 5. City of Los Angeles, Bureau of Sanitation. 1996. Sewer Facilities Charge, Sewage Generation Factors for Residential and Commercial Categories.
- 6. City of Los Angeles, Dept. of Public Works, Bur. Engineering. <u>Historic Resources</u> <u>Inventory</u>. Electronic data base.
- 7. City of Los Angeles, Department of Public Works. May 2002. Development Best Management Practices Handbook.
- 8. City of Los Angeles, Dept. of Public Works. 2007. Hyperion Service Area.
- 9. City of Los Angeles. Municipal Code.
- 10. Flood Map. Federal Emergency Management Agency. <u>Flood Insurance Rate Maps</u>. Community Panel number 0607200005A
- 11. General Plan. City of Los Angeles, Dept. of City Planning. <u>General Plan</u>. Including community plans and technical elements. When identified, the project area Community Plan is the Wilshire Community Plan, update adopted September 19, 2001.
- 12. Geologic Map. California Dept. of Conservation, Div. of Mines and Geology. <u>Geologic</u> Map of California: Los Angeles Sheet.
- 13. Thresholds. City of Los Angeles, Dept. of Environmental Affairs. <u>L.A. CEQA Thresholds</u> <u>Guide: Your Resource for Preparing CEQA Analyses in Los Angeles.</u> 2006.
- 14. U.S. Department of the Interior. National Park Service, National Register of Historic Places

#### **Site-Specific Documents**

- 15. City of Los Angeles, Draft Environmental Impact Report (including technical studies). Cedars-Sinai Medical Center Master Plan. EIR No. 90-0643(ZC)(HD). April 1992.
- 16. City of Los Angeles, Final Environmental Impact Report (including technical studies).

## INITIAL STUDY DEPARTMENT OF CITY PLANNING

Cedars-Sinai Medical Center Master Plan. EIR No. 90-0643(ZC)(HD). September 1992.

- 17. City of Los Angeles. Ordinance No. 168.847. 1993. Zone Change for Cedars-Sinai Medical Center.
- 18. City of Los Angeles. Ordinance No. 168,848. 1993. Development Agreement between Cedars-Sinai Medical Center and the City of Los Angeles.
- 19. City of Los Angeles. Ordinance No. 178,866. 2007. Amendment to the Development Agreement between Cedars-Sinai Medical Center and the City of Los Angeles.

#### C. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
1. AESTHETICS Would the project:				
a) Have a substantial adverse effect on a scenic vista?			×	
Reference: 11				
<ul> <li>b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</li> <li>Reference: 11</li> </ul>			×	
<ul> <li>c) Substantially degrade the existing visual character or quality of the site and its surroundings?</li> <li>Reference: See Section IV, Environmental Impact Evaluation.</li> </ul>		×		
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? Reference: See Section IV, Environmental Impact Evaluation.		×		
2. AGRICULTURE RESOURCES – Would the project: <ul> <li>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?</li> <li>Reference: 4, 11</li> </ul>				×
<ul><li>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</li><li>Reference: 4, 11</li></ul>				×
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? Reference: 4, 11				×
O AID OHALITY IN THE				

**3. AIR QUALITY --** Would the project:

	llly ant t	an ant	an	act
Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?  Reference: See Section IV, Environmental Impact Evaluation.	×			
<ul> <li>b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?</li> <li>Reference: See Section IV, Environmental Impact Evaluation.</li> </ul>	×			
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)? Reference: See Section IV, Environmental Impact Evaluation.	×			
d) Expose sensitive receptors to substantial pollutant concentrations?  Reference: See Section IV, Environmental Impact Evaluation.	×			
e) Create objectionable odors affecting a substantial number of people?  Reference: See Section IV, Environmental Impact Evaluation.	×			
4. BIOLOGICAL RESOURCES – Would the project: <ul> <li>a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</li> <li>Reference: 11, 15</li> </ul>				×
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? Reference: 11, 15				×
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? Reference: 11, 15				×
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? Reference: 11, 15				×
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? Reference: 11, 15				×

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, or state habitat conservation plan? Reference: 11, 15				×
5. CULTURAL RESOURCES – Would the project: <ul> <li>a) Cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations Section 15064.5? Reference: 2, 6, 14</li> </ul>				×
<ul> <li>b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations Section 15064.5?</li> <li>Reference: 2, 14</li> </ul>				×
<ul> <li>c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</li> <li>Reference: 15</li> </ul>				×
<ul> <li>d) Disturb any human remains, including those interred outside of formal cemeteries?</li> <li>Reference: 15</li> </ul>				×
<ul> <li>6. GEOLOGY AND SOILS – Would the project:</li> <li>a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:</li> <li>i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?</li> <li>References: 3, 15</li> </ul>			×	
ii) Strong seismic ground shaking?  Reference: 3, 15			×	
iii) Seismic-related ground failure, including liquefaction? Reference: 15			×	
iv) Landslides? Reference: 15			×	
b) Result in substantial soil erosion or the loss of topsoil?  Reference: 15			×	

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
<ul> <li>c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? Reference: 15</li> </ul>			×	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? Reference: 1, 15			×	
<ul> <li>e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? Reference: 8</li> </ul>				×
7. HAZARDS AND HAZARDOUS MATERIALS – Would the project: <ul> <li>a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</li> <li>Reference: 15, 16</li> </ul>			×	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? Reference: 15, 16			×	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? Reference: 15, 16			×	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? Reference: 15, 16			×	
<ul> <li>e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?</li> <li>Reference: 11</li> </ul>				×
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? Reference: 11				×
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? Reference: 17			×	

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? Reference: 11				×
8. HYDROLOGY AND WATER QUALITY Would the project: <ul> <li>a) Violate any water quality standards or waste discharge requirements?</li> </ul> Reference: 7			×	
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?  Reference: 15			×	
<ul> <li>c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off- site?</li> <li>Reference: 15</li> </ul>			×	
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site? Reference: 15				×
<ul> <li>e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?</li> <li>Reference: 15</li> </ul>				×
f) Otherwise substantially degrade water quality?  Reference: 7, 15				×
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? Reference: 10				×
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows? Reference: 10				×

## INITIAL STUDY DEPARTMENT OF CITY PLANNING

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
<ul> <li>i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?</li> <li>Reference: 10</li> </ul>				×
j) Inundation by seiche, tsunami, or mudflow?  Reference: 15				×
<ul><li>9. LAND USE AND PLANNING Would the project:</li><li>a) Physically divide an established community?</li><li>Reference: 11</li></ul>				×
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? Reference: 11				×
<ul> <li>c) Conflict with any applicable habitat conservation plan or natural community conservation plan?</li> <li>Reference: 11</li> </ul>				×
<ul> <li>10. MINERAL RESOURCES – Would the project:</li> <li>a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?</li> <li>Reference: 15</li> </ul>				×
<ul> <li>b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?</li> <li>Reference: 15</li> </ul>				×
<ul> <li>11. NOISE – Would the project result in:</li> <li>a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</li> <li>Reference: See Section IV, Environmental Impact Evaluation.</li> </ul>	×			
<ul> <li>b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?</li> <li>Reference: See Section IV, Environmental Impact Evaluation.</li> </ul>	×			
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? Reference: See Section IV, Environmental Impact Evaluation.	×			
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	×			

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
Reference: See Section IV, Environmental Impact Evaluation.				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? Reference: 11				×
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? Reference: 11				×
<ul> <li>12. POPULATION AND HOUSING Would the project:</li> <li>a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</li> <li>Reference: 15</li> </ul>				×
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? Reference: 15				×
<ul> <li>c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?</li> <li>Reference: 15</li> </ul>				×
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?			×	
Reference: 13, 15, 16				
ii) Police protection?			×	
Reference: 13, 15				
iii) Schools?			×	
Reference: 15	<del></del>	_ <del>_</del>	<del>_</del>	
iv) Parks?				×
Reference: 11			_	

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
v) Other public facilities? Reference:				×
14. RECREATION <ul> <li>a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? Reference:</li> </ul>				×
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment? Reference:				×
<ul> <li>15. TRANSPORTATION/TRAFFIC Would the project:</li> <li>a) Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?</li> <li>Reference: See Section IV, Environmental Impact Evaluation.</li> </ul>	×			
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways? Reference: See Section IV, Environmental Impact Evaluation.	×			
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks? Reference: See Section IV, Environmental Impact Evaluation.	×			
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? Reference: See Section IV, Environmental Impact Evaluation.	×			
e) Result in inadequate emergency access?  Reference: See Section IV, Environmental Impact Evaluation.	×			
f) Result in inadequate parking capacity?  Reference: See Section IV, Environmental Impact Evaluation.	×			
<ul> <li>g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?</li> <li>Reference: See Section IV, Environmental Impact Evaluation.</li> </ul>	×			
16. UTILITIES AND SERVICE SYSTEMS – Would the project:				

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
<ul> <li>a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</li> <li>Reference: 5, 8, 15</li> </ul>			×	
<ul> <li>b) Require or result in the construction of new water or wastewater treatment facilities, the construction of which could cause significant environmental effects?</li> <li>Reference: 5, 8, 15</li> </ul>			×	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? Reference: 15			×	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? Reference: 5, 8, 15			×	
<ul> <li>e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?</li> <li>Reference: 5, 8, 15</li> </ul>			×	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? Reference: 15			×	
<ul> <li>g) Comply with federal, state, and local statutes and regulations related to solid waste?</li> <li>Reference: 15</li> </ul>				×
17. MANDATORY FINDINGS OF SIGNIFICANCE a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? Reference: See Section IV, Environmental Impact Evaluation.				×
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? Reference: See Section IV, Environmental Impact Evaluation.	×			

### INITIAL STUDY DEPARTMENT OF CITY PLANNING

Issues	Potentially Significant Impact	Less Than Significant With	Less Than Significant	No Impact
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? Reference: See Section IV, Environmental Impact Evaluation.	×			

#### IV. ENVIRONMENTAL IMPACT EVALUATION

#### 1. AESTHETICS. Would the project:

- a) Have a substantial adverse effect on a scenic vista?
- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway?
- c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. The Project Site is located in the densely developed Wilshire District of the City of Los Angeles and specifically in the Beverly Center-Cedars Sinai Regional Commercial Center. This area contains a mix of medical, commercial and retail uses with buildings of various sizes and architectural designs. The Project Site is not located near any scenic corridor or scenic highway. According to the Wilshire Community Plan, the Project Site is not located within a scenic view shed.

The visual character of the Project Site and surrounding area is that of a fully developed urban district, developed with a mix of medical, retail, commercial, and residential uses. Development along the major streets in the project vicinity, such as Beverly Boulevard, Third Street, La Cienega Boulevard, and San Vincente Boulevard, is dominated by low-rise (one and two stories) and mid-rise (three to nine stories) retail and commercial uses. Notable structures are the eight-story Beverly Center shopping mall, east of San Vicente Boulevard across from the Project Site; the Pacific Design Center, with a nine-story and a six-story buildings, located one-half mile north of the site; the ten-story Sofitel Hotel, on the north side of Beverly Boulevard across from the Beverly Center; the 10-story CSMC Towers; an 11-story apartment complex at San Vicente Boulevard and Burton Way; the 15-story medical office towers south of the Project Site on Third Street; and the 11-story Pacific Theaters building west of the Project Site.

The Project Site is currently developed with the two-story Existing Building and adjacent Existing Parking Lot. Primary views of the Project Site in the immediate area are internal views from the CSMC Campus at Gracie Allen Drive and George Burns Road. Views of the Project Site from Beverly Boulevard or Robertson Boulevard are fully or partially obstructed by adjacent buildings. Vegetation on the Project Site consists of landscaping associated with existing CSMC Campus. The Project would not result in the removal of a valued aesthetic feature. The Existing Building is not designated as and is not a valued aesthetic feature, and existing views of the Project Site are limited from the main thoroughfares.

## INITIAL STUDY DEPARTMENT OF CITY PLANNING

The Project Site is currently zoned as [T][Q]C2-2D-O and is restricted to a campus-wide floor area ratio (FAR) of 2.46:1 and a maximum building height of 185 feet. However, the Height District 2 allows a maximum FAR of 6:1. As a result, the proposed 2.71:1 FAR is considered to be consistent with the current zoning.

Using *Thresholds Guide* screening criteria it was determined that:

- The Project would not include a zone change or variance that would increase density, height, and/or bulk.
- The Project would result in a maximum FAR of 2.71:1 which is consistent with the established zoning of [T][Q]C2-2D-O.
- The Project would not involve the development of a natural open space area.
- The Project Site is currently developed with medical and parking uses and does not involve, nor is adjacent to, any natural open space.
- The Project would not result in the removal of a valued aesthetic feature. The
  existing Spielberg Building is not designated as a valued aesthetic feature and
  existing views of the site are limited from the main thoroughfares.
- The Project would not introduce features that are inconsistent with the localized area or the applicable design guidelines.
- The Project would not obstruct, interrupt, or diminish a valued focal and/or panoramic view.
- The Project does not occur within or adjacent to a valued focal or panoramic vista or within view of any designated scenic highway, corridor, or parkway.
- The Project does not propose structural elements that would interfere with or inadequately protect existing visual resources and/or views, as significant visual resources are not located in the Project area.

The screening process conclusions identified above are further supported by conclusions of the Original EIR prepared for the 1993 Master Plan. The Original EIR determined that the Master Plan would have less than significant project-level impacts on aesthetic (including visual character, artificial light, and shade/shadow), but that it would have direct and indirect cumulative impacts on views and with respect to illumination and shadows. However, all impacts related to aesthetics were reduced to less than significant through mitigation measures adopted from the Original EIR. The Project would create no new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to views, scenic vistas or shade/shadows.

Because the Project would not result in a substantial change to conditions previously considered, the potential impacts noted above would remain less than significant and further analysis is not required. However, changes in the intensity and physical appearance of development proposed by the Project may result in a net change in the impacts to the physical environment as discussed below.

Development of the Project may increase the visibility of development at the Project Site due to increased building height and bulk compared to that of existing development and/or implementation of the remaining Master Plan development. However, visibility of the Project Site would remain limited because off-site views of the Project Site are already obstructed by surrounding development. The Project would incorporate many of the architectural elements of the existing buildings on the CSMC Campus and would thereby unify the visual character of the CSMC Campus. It is anticipated that the Project would be

consistent with the existing visual character of the surrounding area; however, further analysis in the EIR is recommended to address this issue.

The Project would introduce light-blocking structures, but (as was demonstrated in the Original EIR) would not affect any shadow-sensitive use(s) that would be located within a distance of three times the height of the West Tower and parking structure to the north, northwest or northeast. A maximum shadow of 545 feet (a length just under the 3:1 height ratio) would be cast from the proposed 185-foot West Tower during the winter solstice at 9:00 AM and 3:00 PM. During the morning hours, the shadow would affect the center of the CSMC Campus, Sherbourne Drive, and Gracie Allen Drive. The shadow would affect the Beverly Center and San Vicente Boulevard during afternoon hours. During the spring and fall equinoxes, a maximum shadow length of 395 feet would be cast from the West Tower between 8:00 AM and 4:00 PM. During morning hours, the shadow would cover portions of the CSMC Campus and Sherbourne Drive. In the afternoon, the shadow would cover a portion of the Beverly Center and San Vicente Boulevard. The shadows cast by the Project would be less than three times its height and would be cast on commercial, CSMC, and/or street uses, not on shadow-sensitive uses. Therefore, the Project is not anticipated to result in significant impacts to shade/shadow conditions and would not require further evaluation.

Revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts on short-range views, scenic resources or shade/shadow-sensitive uses not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen. Only the potential changes to the visual character are anticipated. The potential significance of the Project's impacts related to visual character, long-range views and lighting should be addressed in the EIR.

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

**Less Than Significant Impact.** Existing light sources on the Project Site include street lighting, interior building lighting, parking lot and security lighting. Using *Thresholds Guide* screening criteria it was determined that the Project would not include lighting that would routinely spillover onto a light-sensitive land use.

Implementation of the Project would involve similar light sources as those approved by the Master Plan and as already exist on the Project Site. Lighting associated with the Project would be confined to the CSMC Campus boundaries and proposed lighting would be shielded or directed downwards to minimize light spillover. Although the Project is not anticipated to result in significant impacts associated with new sources of substantial light or glare, further evaluation is recommended in the EIR to address this issue.

#### 2. AGRICULTURE RESOURCES. 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?

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

**No impact.** The Project involves construction within a developed urban area. The Farmland Mapping and Monitoring Program (State Department of Conservation, 2002) does not identify any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance at the Project Site. The Project Site is not protected by a Williamson Act Contract. Therefore, as the project will not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use or conflict with existing agricultural zoning or protected land, no impacts would be expected. Therefore, the Project is not anticipated to result in significant impacts to agricultural resources and would not require further evaluation.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no environmental impacts on agricultural resources, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

#### 3. AIR QUALITY. Would the project:

- a) Conflict with or obstruct implementation of the applicable air quality plan?
- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?
- d) Expose sensitive receptors to substantial pollutant concentrations?
- e) Create objectionable odors affecting a substantial number of people?

**Potentially Significant Impact.** The Project would involve the construction of an additional 100 inpatient beds (or equivalent of 200,000 square feet of floor area of medical services) above the development levels approved per the current Master Plan. The *Thresholds Guide* screening criteria use a size of 61,000 square feet of medical office uses as the criteria for which a project may have the potential to exceed the daily emissions significance thresholds. Further, the Project-related traffic and operational characteristics may be somewhat changed from those conditions addressed in the Original EIR and have the potential to result in a significant impact. For these reasons, it is recommended that the potential impacts to Air Quality be analyzed in the Project EIR.

#### 4. BIOLOGICAL RESOURCES. Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?
- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- f) Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, or state habitat conservation plan?

**No impact.** The Project Site and the surrounding area is urbanized and developed with a range of moderate intensity commercial, medical services and residential uses. Vegetation at the Project Site is limited to landscaping associated with existing development. Proposed new facilities are associated with the existing urban development. There are no natural habitats on or near the Project Site.

Using *Thresholds Guide* screening criteria, it was determined that the Project would have no impact on biological resources. The Project Site does not include or is near natural open space or a natural water source, and no sensitive species are known to use or inhabit the site.

The screening process conclusions identified above are further collaborated by conclusions of the Original EIR prepared for the 1993 Master Plan. The Original EIR determined that the Master Plan would have less than significant impacts on biological resources (both animal and plant life). Given that the CSMC Campus was and remains in a highly urbanized area, conditions related to biological resources have not changed. The Project would create no new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to biological resources.

Because the Project would not result in a substantial change to conditions previously considered, the potential impacts to biological resources would remain less than significant and further analysis is not required. As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no environmental impacts on biological resources not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

#### 5. CULTURAL RESOURCES. Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations Section 15064.5?
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations Section 15064.5?
- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- d) Disturb any human remains, including those interred outside of formal cemeteries?

**No impact.** The Project Site has been previously disturbed and is currently covered with medical facilities. No historic, archaeological, or paleontological sites or resources were identified in a search of pertinent records, maps, and literature, including the National Register of Historic Places and the California Historical Landmarks.

Using *Thresholds Guide* screening criteria, it was determined that the Project would have no impact on cultural resources, since the Project does not occur in an area with known archaeological resources, archaeological study area, or fossil site.

Further, the City of Los Angeles has adopted standard conditions that require that the grading and excavation activities be monitored for evidence of significant cultural resources. These standard conditions were implemented into Ordinance No. 168,847 for all grading at the CSMC Campus and will apply to the proposed Project.

The screening process conclusions identified above are further supported by conclusions of the Original EIR prepared for the 1993 Master Plan. The Original EIR determined that the Master Plan would have less than significant impacts on cultural resources, including archeological, paleontological and historical resources. Because the potential for cultural resources within the Project Site were anticipated, no mitigation measures were required per the Original EIR. The Project would create no new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to cultural resources.

Because the Project would not result in a substantial change to conditions previously considered, the potential impacts to cultural resources would remain less than significant and further analysis is not required. As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no environmental impacts on cultural (including archeological, paleontological and historical) resources not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

#### 6. GEOLOGY AND SOILS. Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for

#### the area or based on other substantial evidence of a known fault?

#### ii) Strong seismic ground shaking?

Less Than Significant Impact. Several active fault zones are known to exist in the Los Angeles region, which could produce strong groundshaking in the Project area. The seismically active faults nearest to the Project Site include: 1) the Inglewood branch of the Newport-Inglewood fault zone, approximately 1.3 miles southwest, 2) the Raymond Fault, approximately 10.5 miles east, 3) the Malibu Coast Fault, approximately 13 miles west-southwest, and 4) the San Fernando fault, approximately 14 miles north of the Project Site.

No known faults considered active are found on or adjacent to the Project Site. Although the potentially active Santa Monica fault is believed to traverse the existing CSMC Campus, the fault is not believed to traverse the Project Site. The fault trends east-west to east-northeast across the existing CSMC Campus and has been identified as extending through the intersection of San Vicente Boulevard and Beverly Boulevard.

As in other areas of the Los Angeles region, the Project Site may be subject to potential groundshaking from earthquakes along active and potentially active faults in the Los Angeles area. Project design and construction procedure would involve consideration of seismic design parameters in accordance with standard engineering practice and uniform codes.

Using *Thresholds Guide* screening criteria, it was determined that the Project Site is not designated on official maps and databases or from past episodes as susceptible to unusual geologic hazards, and the Project would not involve the placement of structures on fill or involve the extraction of mineral resources, groundwater, oil or natural gas.

The screening process conclusions identified above are further supported by conclusions of the Original EIR prepared for the 1993 Master Plan. The Original EIR determined that the Master Plan would have less than significant impacts with respect to geology and soils (including grading, geologic hazards, seismicity, soil stability and contaminated soils). However, any impacts that did existall impacts related to geology and soils were further reduced through mitigation measures adopted from the Original EIR. The Project would create no new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to geology and soils.

Because the Project would not result in a substantial change to conditions previously considered, the potential impacts noted above would remain less than significant and further analysis is not required. Further, adherence to the Building Code and the Los Angeles Seismic Safety Plan would ensure that potential seismic risks would be reduced to a level of less than significant. Therefore, the impacts associated with seismic ground shaking are less than significant and do not require further evaluation.

#### iii) Seismic-related ground failure, including liquefaction?

**Less Than Significant Impact.** The potential for liquefaction has been found to be greatest where the groundwater level is shallow and loose and fine sands occur within a depth of approximately 50 feet or less. Liquefaction potential decreases with increasing grain size and clay and gravel content. Groundwater levels in the Project Site area range from approximately seven to 20 feet below grade. Soils existing beneath the site at levels below the groundwater surface consist primarily of clay, and to a lesser extent, sands, silty

sands, and silts. The sands beneath the site are dense and are not considered susceptible to liquefactions. Also, due to the dense nature of the granular soils encountered beneath the Project Site, the potential for seismically-induced differential settlement is considered very low. Project design and construction procedure involves consideration of seismic design parameters in accordance with standard engineering practice and building codes.

Using *Thresholds Guide* screening criteria, it was determined that the Project Site is not susceptible to unusual geologic hazards due to the physical properties of the site. The screening process conclusions identified above are further supported by conclusions of the Original EIR prepared for the 1993 Master Plan. Because the Project would not result in a substantial change to conditions previously considered, the potential impacts noted above would remain less than significant and further analysis is not required. Further, adherence to the Building Code and the Los Angeles Seismic Safety Plan would ensure that potential seismic risks would be reduced to a level of less than significant. Therefore, the impacts associated with seismic-related ground failure are less than significant and do not require further evaluation.

#### iv) Landslides?

**No Impact.** The Project Site and surrounding area are essentially flat and are not adjacent to any hillside area. Therefore, the Project is not anticipated to result in significant impacts associated with seismic-induced landslides and would not require further evaluation.

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

Less Than Significant Impact. The Project Site is currently developed and essentially flat. Implementation of the Project would involve excavations for subterranean parking and basement structures. The facility design for the Project would involve use of registered professionals as appropriate to ensure that facility design and construction results in stable earth conditions. Further, the earthwork and surface condition changes would be evaluated as part of the building permit process. Standard practices incorporate techniques appropriate to the situation as described in the California Storm Water Best Management Practice Handbook for Construction Activity, or other techniques of equivalent effectiveness to address erosion potential. Standard procedure includes compliance with South Coast Air Quality Management District guidance related to minimization of wind erosion and incorporation of best management practices for water erosion control in project construction.

Using Thresholds Guide screening criteria it was determined that the Project does not involve grading on a slope of ten percent or more, and does not involve grading, clearing, or excavation activities in an area of known or suspected erosion hazard. The screening process conclusions identified above are further supported by conclusions of the Original EIR prepared for the 1993 Master Plan. Because the Project would not result in a substantial change to conditions previously considered, the potential impacts noted above would remain less than significant and further analysis is not required.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

**Less Than Significant Impact.** Based on the conclusions of the Original EIR (and the accompanying Geotechnical Evaluation), unstable soil is not known to be a potential issue

on the Project Site. Standard procedure for facility design involves use of registered professionals as appropriate to ensure that facility design and construction results in stable earth conditions. Therefore, the Project is not anticipated to result in significant impacts associated with substantial soil erosion and would not require further evaluation.

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

Less Than Significant Impact. Based on the conclusions of the Original EIR, expansive soil is not known to be an issue on the CMSC Campus. If expansive soils were encountered during site improvement, the soil and colluvium materials would probably require removal and replacement with engineered fill materials. Standard practice for facility design involves use of registered professionals as appropriate to ensure that facility design and construction results in stable earth conditions. Because of these standard precautions and procedures, the Project is not anticipated to result in significant impacts associated with expansive soil and does not require further evaluation.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

**No Impact.** Wastewater from the Project Site is currently treated at the Hyperion Treatment Plant. The Project does not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project is not anticipated to result in significant impacts associated with the use of septic tanks or alternative wastewater disposal systems and would not require further evaluation.

Consistent with the conclusions above for all thresholds for geologic, soils and seismic issues, revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts with respect to geology, soils nor seismic hazards not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen

#### 7. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

**Less Than Significant Impact.** The Applicant currently uses and stores liquids and gases that are flammable or combustible at the CSMC Campus. The 1989 CSMC Business Plan requires biennial reporting of hazardous materials inventory changes and updates to the Los Angles Fire Department prior to the issuance of a Certificate of Occupancy for expansions of existing facilities.

In order to minimize health risks to employees and to the residents of the surrounding area, the CSMC places quarterly announcements in a local newspaper identifying that hazardous materials are used and stored on site, trains staff in the use and proper handling of hazardous materials, posts notices on site identifying the site contains hazardous materials, and disposes of hazardous materials properly. The Fire Department has determined that the CSMC is not required to file a Risk Management Prevention Plan, due to the quantities and concentrations of substances used on site.

Using *Thresholds Guide* screening criteria it was determined that the Project would involve the use and storage of toxic, readily combustible, or otherwise hazardous materials; however, the CSMC would update its Business Plan prior to obtaining a Certificate of Occupancy for the Project. Conformance with all applicable laws and regulations and the implementation of all applicable CSMC safety policies and procedures is considered part of the Project. In addition, the Project would not use or manage hazardous substances in sufficient quantities to cause potential hazard.

The screening process conclusions identified above are further supported by conclusions of the Original EIR prepared for the 1993 Master Plan. The Original EIR determined that the Master Plan would have less than significant impacts with respect to hazards and hazardous materials; however, the Original EIR determined that the Master Plan would have significant and unavoidable project-level and cumulative impacts due to the increase in use of hazardous materials, generation of hazardous wastes, and the increased transport/disposal of hazardous materials. Mitigation measures adopted per the Original EIR would reduce these impacts, but not to less than significant levels. Nonetheless, the Original EIR concluded that continued compliance with applicable federal, state, and local laws would reduce the risk associated with hazardous substances to acceptable levels. These significant unavoidable adverse impacts were accepted through the adoption of a Statement of Overriding Considerations. The Project would create no new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to hazards, hazardous wastes and hazardous materials.

Because the Project would not result in a substantial change to conditions previously considered, the potential impacts associated with the use of hazardous materials noted above would remain less than significant and further analysis is not required.

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

**No Impact.** The Project Site is not located within an airport land use plan or is within two miles of a public use airport, or in the vicinity of a private airstrip. Therefore, the Project is not anticipated to result in significant airport safety hazard impacts and would not require

further evaluation.

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

Less Than Significant Impact. The CSMC has a Disaster Response Plan on file with the City of Los Angeles. The Disaster Response Plan responds to a variety of emergency conditions, such as fire and seismic events as well as the release of chemical or hazardous materials. In the event of an emergency, the CSMC is required to notify the Fire Department. The Fire Department provides assistance in control of fire or hazardous material spills and determines whether evacuation of off site areas is necessary or appropriate. Any decision to evacuate off site areas is at the discretion of the Fire Department. Any such decision would conform to established evacuation procedures.

Using Thresholds Guide screening criteria it was determined that the Project would require a revised risk management plan. The CSMC would update its Business Plan, which includes its Disaster Response Plan, prior to obtaining a Certificate of Occupancy for the Project. Conformance with all applicable laws and regulations and the implementation of all applicable CSMC safety policies and procedures is considered part of the Project.

Development of the Project may involve temporary lane closures or traffic detours but would not substantially affect area roadways or other significant transportation corridors. The Project would not involve any permanent changes in transportation corridors.

Because the Project would not result in a substantial change to conditions previously considered, the potential impacts associated with the emergency response plans noted above would remain less than significant and further analysis is not required.

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

**No Impact.** The Project Site is located in a relatively flat, urbanized area. There are thirteen fire hydrants located on or adjacent to the CSMC. The hydrant locations include four hydrants on San Vicente Boulevard, two hydrants on Sherbourne Drive, three hydrants on Gracie Allen Drive, and four hydrants on George Burns Road.

Using *Thresholds Guide* screening criteria it was determined that the Project Site is not located in a brush fire hazard area, hillside, or area with inadequate fire hydrant service or street access. The Project is not anticipated to result in significant impacts associated with wildland fires and would not require further evaluation.

Consistent with the conclusions above for all thresholds for hazards and hazardous materials, revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts with respect to hazards, hazardous wastes and hazardous materials not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

#### 8. HYDROLOGY & WATER QUALITY. Would the project:

#### a) Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. The Project Site is within the Los Angeles Region (4) of the Regional Water Quality Control Board (RWQCB). The City of Los Angeles is subject to the water quality regulations of the Los Angeles RWQCB. Under the authority of the Clean Water Act (CWA), which prohibits the discharge of any pollutant to navigable waters from a point source unless a National Pollutant Discharge Elimination System (NPDES) permit authorizes the discharge, the Environmental Protection Agency (EPA) publishes regulations establishing the NPDES permit application requirements for storm water discharges. As an agent of the State Water Resources Control Board (SWRCB), RWQCBs are authorized to implement a municipal storm water permitting program as part of their NPDES authority.

The SWRCB has issued general storm water discharge permits to cover industrial and construction activities, which are required for specific industry types based on standard industrial classification and construction activities on projects greater than 5,000 square feet. The general permits include: the "Statewide General Industrial Storm Water Permit" (addresses waste discharge requirements for discharges of storm water associated with industrial activities excluding construction activities); and, the "Statewide General Construction Storm Water Permit" (addresses waste discharge requirements for discharges of storm water runoff associated with construction activities).

The RWQCBs oversee implementation and enforcement of the general permits. Municipal permits typically require permittees to develop an area-wide storm water management plan, implement best management practices (BMPs) and perform storm water monitoring. BMPs for the County of Los Angeles are identified in the documents supporting the County NPDES permits. On December 13, 2001, the Los Angeles RWQCB issued a municipal storm water NPDES permit (NPDES Permit No. CAS004001) to the County of Los Angeles and its co-permittees, which include the City of Los Angeles. Implementation of the Best Management Practices (BMPs) in accordance with the Development Best Management Practices Handbook (City of Los Angeles Department of Public Works, May 2002) would adequately protect the water quality during construction activities.

Using *Thresholds Guide* screening criteria it was determined that with implementation of BMPs, construction and operation of the Project would not involve point source discharge or nonpoint sources of contamination into a receiving water body.

Therefore, the Project is not anticipated to result in significant impacts associated with surface water quality and would not require further evaluation.

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

**Less Than Significant Impact.** Potable water is currently supplied to the Project Site by the Los Angeles Department of Water and Power (LADWP). Groundwater levels in the Project Site area range from approximately seven to 20 feet below grade. The Project Site is currently developed with no permeable area.

Using *Thresholds Guide* screening criteria it was determined that the Project would not include groundwater extraction for potable water supply purposes. Due to the shallow depth to groundwater, dewatering may be involved during excavation activities. Basement walls and floor slabs of the proposed subterranean structures would be either waterproofed and designed to withstand the potential hydrostatic pressure imposed on the structures by groundwater, or would utilize a continuous dewatering or subdrainage system. Such systems would be constructed following recommendations made by a licensed engineer prepared specifically for the subterranean structures. It was further determined that the Project would not reduce any permeable area.

Therefore, the Project is not anticipated to result in significant impacts associated with ground water levels and would not require further evaluation.

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

**Less Than Significant Impact.** Runoff from the Project Site drains into existing city storm drains. Drainage facilities in the vicinity include catch basins in Gracie Allen Drive and George Burns Road. Runoff from George Burns Road connects to a 42-inch drain in Gracie Allen Drive.

Using *Thresholds Guide* screening criteria, it was determined that as the Project Site is currently developed and impervious to runoff, development of the Project would not be expected to change the amount of runoff from the Project Site, and run-off from the Project Site would not drain onto an unimproved street or onto adjacent properties.

Therefore, the Project is not anticipated to result in significant impacts associated with existing drainage patterns and would not require further evaluation.

- d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?
- e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
- f) Otherwise substantially degrade water quality?

- g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
- h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?
- i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- j) Inundation by seiche, tsunami, or mudflow?

**No Impact.** Using *Thresholds Guide* screening criteria it was determined that the Project Site is not located within a 100-year flood plain, according to the FEMA Flood Insurance Rate Map, and is also not located in a hillside area, near a dam or levee, or near any large bodies of water.

Therefore, the Project is not anticipated to result in significant impacts associated with inundation and would not require further evaluation.

The Original EIR determined that the Master Plan would have less than significant impacts on hydrology and water quality. The Project would create no new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to hydrology and water quality. As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts with respect to hydrology or water quality not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

#### 9. LAND USE AND PLANNING. Would the project:

a) Physically divide an established community?

**No Impact.** The Project Site is located on the CSMC Campus and surrounded by medical, commercial and residential uses.

Using *Thresholds Guide* screening criteria it was determined that the Project would include a land use compatible with adjacent land uses; the Project would not include features that would cause any permanent disruption in the established community; and the Project would not result in a "spot" zone.

The Project would be a 100 new inpatient bed expansion of the existing Master Plan and would assist in supporting the health care needs of the area and the region. The West Tower and attached 7-level parking structure would be similar in scale and character to other buildings on the CSMC Campus and in the surrounding area. The West Tower would not exceed 185 feet, the maximum height permitted in the Master Plan, and would be of the same architectural style as the other buildings on the CSMCMedical Center Campus. The Project would be an extension of the existing CSMC and would assist in supporting health care in the area.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with

jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

**No Impact.** The General Plan Land Use map designates the Project Site and CSMC Campus as a Regional Commercial land use with a "Health Center" symbol. The zoning for the CSMC Campus and Project Site is [T][Q]C2-2D-O.

Using *Thresholds Guide* screening criteria it was determined that the Project would be consistent with the General Plan and would not require a General Plan amendment. The zoning designation [T][Q]C2-2D-O would not change.

The proposed Project will not change the type of land use on the Project Site, therefore no General Plan amendment would be required. Moreover, the established zoning of [T][Q]C2-2D-O supports the use, density, and height of the Project. Only the Conditions imposed on the current zoning would be revised to accommodate amendments to the CSMC Master Plan and associated Development Agreement (Ordinance No. 168.847). The Zoning designation of [T][Q]C2-2D-O and the land use designation of Regional Commercial would be retained. The Project Site is not located in or near any natural community conservation area and is not associated with any habitat conservation plan. Therefore, the Project is not anticipated to result in significant impacts due to inconsistencies with adopted plans and would not require further evaluation.

The screening process conclusions identified above are further supported by conclusions of the Original EIR prepared for the 1993 Master Plan. The Original EIR determined that the Master Plan would have less than significant project-level impacts on land use planning and zoning. The Project would create no new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to land use planning and zoning.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts on land use planning and zoning not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen. Because the Project would not result in a substantial change to conditions previously considered, the potential impacts associated with land use compatibility would remain less than significant and further analysis is not required.

#### 10. MINERAL RESOURCES. Would the project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

**No Impact.** The Project Site overlies a portion of the Salt Lake Oil Field. Oil is currently being extracted from a portion of the oil field immediately adjacent to the east of the Project Site, across San Vicente Boulevard. Abandoned oil wells are located throughout the Salt Lake Oil Field, including five known abandoned wells within the boundaries of the CSMC Campus. No known oil wells are located on the Project Site.

Using *Thresholds Guide* screening criteria it was determined that the Project would not block access to any potential mineral resources.

Oil wells, which previously existed near the Project Site, have since been abandoned. The Project Site would be developed with similar uses to those currently found on site. Therefore, it is unlikely that the Project would block any ongoing oil extraction activities. The Project is not anticipated to result in significant impacts on mineral resources, and would not require further evaluation.

The Original EIR determined that the Master Plan would have less than significant impacts on mineral resources. The Project would create no new or substantially increased significant impacts on mineral resources beyond those analyzed in the Original EIR. As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts on mineral resources not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

#### 11. NOISE. Would the project result in:

- a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?
- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

**Potentially Significant Impact.** Using *Thresholds Guide* screening criteria it was determined that construction activity would temporarily increase noise levels in the Project Site area and would be within 500 feet of sensitive uses. The Project may introduce stationary noise sources, such as mechanical ventilation equipment, that could be audible beyond the property line of the Project Site. Further, the Project-related traffic and operational characteristics may be somewhat changed from those conditions addressed in the Original EIR and have the potential to result in a significant impact. For these reasons, it is recommended that the potential impacts related to Noise be analyzed in the Project EIR.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the

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

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

**No Impact.** Using *Thresholds Guide* screening criteria it was determined that the Master Plan area is not located within an airport land use plan, or within two miles of a public airport or public use airport, or within the vicinity of a private airstrip. The Original EIR determined that the Master Plan would have less than significant impacts with respect to airport noise. The Project would create no new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to airport noise. Therefore, the Project is not anticipated to result in significant impacts associated with airport noises and further evaluation of such is not required.

#### 12. POPULATION AND HOUSING. Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

**No Impact.** The Project Site is currently developed and located in a fully developed urban area. Using *Thresholds Guide* screening criteria it was determined that the Project would not include a General Plan amendment, which could result in an increase in population over that projected in the General Plan, nor would the Project induce substantial growth around the Project Site as it does not involve the construction of major infrastructure. The proposed medical facilities would replace and are an extension of existing medical facilities.

The screening process conclusions identified above are further supported by conclusions of the Original EIR prepared for the 1993 Master Plan. Because the Project would not result in a substantial change to conditions previously considered, the potential impacts associated with population growth would remain less than significant and further analysis is not required.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

**No Impact.** The Project Site is currently developed with medical facilities and parking lot uses. The *Thresholds Guide* screening criteria it was determined that the Project would not involve displacement of existing housing and/or residents. Therefore, the Project is not anticipated to result in significant impacts associated with housing and/or resident displacement and would not require further evaluation.

The Original EIR determined that the Master Plan would have less than significant impacts on population and housing. Further, employment impacts in the context of jobs/housing balance were determined to be less than significant. The Project would create no new or substantially increased significant impacts on population and housing beyond those analyzed in the Original EIR. As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no

new significant environmental impacts on population, housing and employment not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen. Because the Project would not result in a substantial change to conditions previously considered, the potential impacts associated with population and housing would remain less than significant and further analysis is not required.

#### 13. PUBLIC SERVICES. Would the project:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
  - i) Fire protection?

**Less Than Significant Impact.** The Los Angeles Fire Department has fire stations at the following locations for initial response into the Project area. Distances shown were calculated to the intersection of Gracie Allen Drive and George Burns Road:

Fire Station No. 58

Task Force Station – Truck and Engine Company Battalion 18 Headquarters
1556 South Robertson Boulevard

Fire Station No. 61 2.0 miles

Task Force Station – Truck and Engine Company 5821 west Third Street

Fire Station No. 41 3.2 miles

Single Engine Company 1439 North Gardner Street

Using Thresholds Guide screening criteria it was determined that the Project would be located farther from an engine or truck company than the maximum response distance. The maximum response distance for a Truck and Engine company to a Commercial Center is 1 mile and 0.75 miles, respectively. As shown above, the Project Site is at a slightly greater distance. However, per mitigation measures required and implemented from the Original EIR, which address CSMC Campus access and building requirements, fire protection impacts were reduced to less than significant levels. These mitigation measures would still be required as part of any additional development completed in accordance with the 1993 Master Plan, including the Project. Therefore, potential impacts related to fire protection would be adequately mitigated to less than significant levels and further analysis is not required.

The Project Site is not located in a brush fire hazard area, hillside, or area with inadequate fire hydrant service or street access. The Project Site is located in a relatively flat,

# INITIAL STUDY DEPARTMENT OF CITY PLANNING

urbanized area. There are thirteen fire hydrants located on or adjacent to the CSMC Campus. The hydrant locations include four hydrants on San Vicente Boulevard, two hydrants on Sherbourne Drive, three hydrants on Gracie Allen Drive, and four hydrants on George Burns Road.

The Project does involve the use and storage of toxic, readily combustible, or otherwise hazardous materials. CSMC currently uses and stores liquids and gases that are flammable or combustible. The 1989 CSMC Business Plan requires biennial reporting of hazardous materials inventory changes to the Los Angles Fire Department and updates prior to the issuance of a Certificate of Occupancy for expansions of existing facilities.

In order to minimize health risks to employees and to the residents of the surrounding area, the CSMC places quarterly announcements in a local newspaper identifying that hazardous materials are used and stored on site, trains staff in the use and proper handling of hazardous materials, posts notices on site identifying the site contains hazardous materials, and disposes of hazardous materials properly. The Fire Department has determined that the CSMC is not required to file a Risk Management Prevention Plan, due to the quantities and concentrations of substances used on site. Conformance with all applicable laws and regulations and the implementation of all applicable CSMC safety policies and procedures is considered part of the Project.

The CSMC also has a Disaster Response Plan on file with the City of Los Angeles. The Disaster Response Plan responds to a variety of emergency conditions, such as fire and seismic events as well as the release of chemical or hazardous materials. In the event of an emergency, the CSMC is required to notify the Fire Department. The Fire Department provides assistance in control of fire or hazardous material spills and determines whether evacuation of off-site areas is necessary or appropriate. Any decision to evacuate off-site areas is at the discretion of the Fire Department. Any such decision would conform to established evacuation procedures. The CSMC would be required to update its Business Plan prior to obtaining a Certificate of Occupancy for the Project.

The Project's location would provide for adequate LAFD access. Both George Burns road and Gracie Allen Drive are wider than the minimum 20 feet required for LAFD access, do not have a grade exceeding 15 percent, and are not dead-ends exceeding 700 feet. Per the mitigation measures in the Original EIR, these site planning considerations adequately mitigate potential impacts related to emergency access to a less than significant level, and no further analysis is required.

There are two street intersections near the Project Site that would have a level of service (LOS) of E or F due to implementation of the Project. The intersections of Robertson Boulevard/Alden-Gracie Allen Drives and George Burns Road/Beverly Boulevard would be significantly affected by implementation of the Project unless mitigation measures are implemented. Further analysis of these intersections, to identify appropriate mitigation measures, as well as other area intersections as appropriate, is recommended in the Project EIR. Traffic congestion issues, including those that may affect accessibility of emergency vehicles, would be addressed through the traffic analysis in the Project EIR.

Per the Original EIR, mitigation measures pertaining to Fire Protection services were adopted and would be carried forward to the Project as follows:

• The Project shall comply with all applicable State and local codes and ordinances

and the guidelines found in the Fire Protection and Fire Prevention Plan and the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles.

- Definitive plans and specifications shall be submitted to the Fire Department and requirements for necessary permits satisfied prior to commencement of any portion of this project.
- All first story portions of any building must be within 300 feet of an approved fire hydrant.
- Fire lanes in commercial of industrial areas shall be no more than 300 feet from a fire hydrant.
- Adequate pubic and private fire hydrants shall be required.
- Any person owning or having control of any facility, structure, group of structures, or premises shall proved and maintain Fire Department access.
- If any portion of the first story exterior walls of any building or structure is more than 150 feet from the edge of the roadway of an improved street, an approved fire lane shall be provided so that such portion is within 150 feet of the edge of the fire lane.
- At least two different ingress/egress roads for each area able to accommodate major fire apparatus and provide for an evacuation during emergency situations shall be required.
- Construction of public or private roadways in the proposed development shall not exceed a 15 percent grade.
- Private development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549.
- Access for Fire Department apparatus and personnel to and into all structures shall be required.
- No fire land shall be less than 20 feet in width. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
- Sprinkler systems shall be required throughout any structure in accordance with the Los Angeles Municipal Coed, Section 57.09.07.
- To mitigate potential significant impact on access, the Medical Center should covenant and agree that all current public and private streets shall remain open to free travel of emergency vehicles.
- The water delivery system shall be improved to the satisfaction of the Fire Department prior to occupancy of any new development.

Implementation of standard conditions of approval and these mitigation measures, as well as the collection of service fees/taxes associated with the Project, would reduce all fire protection service impacts to a less than significant level and would not require further evaluation.

#### ii) Police protection?

**Less Than Significant Impact.** The Project Site is located in the Los Angeles Police Department's Wilshire Area, in Reporting District 7. The Wilshire Area station is located at 4861 West Venice Boulevard. The Project Site is currently developed with 90,000 square feet of medical uses.

The *Thresholds Guide* screening criteria for police protection services asks: Would the Project result in a net increase of 75 residential units, 100,000 square feet of commercial

floor area, or 200,000 square feet of industrial floor area?

The Project would involve the development of 100 new inpatient beds (200,000 net square feet of floor area for medical uses) beyond the 700,000 net square feet of development approved and vested under the Master Plan. Several mitigation measures pertaining to Police Protection services were adopted per the Original EIR and Development Agreement, and would be carried forward under the Project. These mitigations are:

- Elevators, lobbies, and parking areas should be well-illuminated and designed with minimum dead space to eliminate area of concealment.
- Tenant parking areas should be controlled by an electronic card-key gate in conjunction with a closed circuit television system.
- Private security guards are recommended to monitor and patrol the development.
- Upon project completion the applicant should be encouraged to provide the Wilshire Area commanding officer with a diagram of the project. The diagram should include access routes, unit numbers, and any information the might facilitate police response.
- CSMC shall make available up to 1,500 square feet of floor area within the Property for a temporary Los Angeles Police Department sub-station, subject to the acceptance and approval thereof by the Los Angeles Police Department and The Los Angeles City Council.

In addition, the CSMC uses would continue to use a private security network including closed circuit television system and security personnel throughout the CSMC.

Implementation of standard conditions of approval and these mitigation measures, as well as the collection of service fees/taxes associated with the Project would reduce the Project's police protection service impacts to a less than significant level and no further evaluation is required.

#### iii) Schools?

**Less Than Significant Impact.** The Project Site is located in the Los Angeles Unified School District, Board of Education District 1. The Project Site is currently developed with 90,000 square feet of medical uses.

Using Thresholds Guide screening criteria it was determined that the Project would result in a net increase of at least 100,000 square feet of commercial floor area. The Project would involve the development of 100 new inpatient beds (200,000 net square feet of floor area for medical uses) beyond the 700,000 net square feet of development approved and vested under the Master Plan. However, these medical uses would be similar to existing land uses at the Project Site and would be an extension of the established CSMC Campus. As the surrounding area is fully developed, the addition of 100 new inpatient beds is not expected to promote residential development in areas surrounding the Project Site. Therefore, the Project is not expected to involve growth-inducing impacts associated with schools and would not require further evaluation.

#### iv) Parks?

No impact. The Project involves the development of medical and parking uses. Using

# INITIAL STUDY DEPARTMENT OF CITY PLANNING

Thresholds Guide screening criteria it was determined that the Project would not result in a net increase of any residential units. Therefore, the Project is not anticipated to result in significant impacts to parks and would not require further evaluation.

#### v) Other public facilities?

**No impact.** The Project involves the development of medical and parking uses. Using Thresholds Guide screening criteria it was determined that the Project would not result in a net increase of any residential units. Therefore, the Project is not anticipated to result in significant impacts to other public facilities and would not require further evaluation.

In summary, the Original EIR determined that the Master Plan would have less than significant impacts on public services, including fire protection, police protection, schools, parks and recreation and libraries, except that the Master Plan would have significant project-level and cumulative impacts on fire protection services and on police protection services. Mitigation measures adopted per the Original EIR would reduce these impacts, but not to less than significant levels. Nonetheless, the Original EIR concluded that continued compliance with applicable state and local codes, and guidelines in City planning/policy documents, would reduce these impacts to the extent reasonably feasible. These significant unavoidable adverse impacts were accepted through the adoption of a Statement of Overriding Considerations. The Project would create no new or substantially increased significant impacts on public services beyond those analyzed in the Original EIR.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts on public services not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

#### 14. RECREATION. Would Project:

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

**No Impact.** The Project would not create additional demand for recreational facilities. Therefore, the Project is not anticipated to result in significant impacts to recreational facilities and would not require further evaluation.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

**No Impact.** The Project does not include or require the construction of recreational facilities. Therefore, the Project is not anticipated to result in significant impacts from the construction of recreational facilities and would not require further evaluation.

The Original EIR determined that the Master Plan would have less than significant impacts on parks and recreation resources. The Project would create no new or substantially increased significant impacts on park and recreation resources beyond those analyzed in the Original EIR. As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts on park and recreation resources not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

#### 15. TRANSPORTATION/TRAFFIC. Would the project:

- a) Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?
- b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?
- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- e) Result in inadequate emergency access?
- f) Result in inadequate parking capacity?
- g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

**Potentially Significant Impact.** The Project would involve the construction of 200,000 square feet of medical facilities above the approved authorized development of the existing Development Agreement for the CSMC Campus and Project Site. The *Thresholds Guide* screening criteria for substantial traffic increase is the diversion or shift of 500 or more daily trips or 43 or more p.m. peak hour vehicle trips on the street system. As the net size of the Project has the potential to exceed the daily and peak trips significance thresholds, potential impacts to Transportation/Traffic are recommended for further study under the Project EIR.

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

**No Impact.** The Project Site is not located within an airport land use plan or is within two miles of a public use airport, or in the vicinity of a private airstrip. The Project would have no impact on air traffic patterns. As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no impacts on air traffic patterns, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen. Therefore, the Project is not anticipated to result in significant impacts to air traffic patterns and would not require further evaluation of this issue.

#### 16. UTILITIES & SERVICE SYSTEMS. Would the project:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- b) Require or result in the construction of new water or wastewater treatment facilities, the construction of which could cause significant environmental effects?
- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
- e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. Water is currently supplied to the Project Site by the Los Angeles Department of Water and Power (LADWP), which also distributes water to most of the City of Los Angeles. The LADWP had indicated that the existing water system could accommodate the anticipated water use demand of the CSMC Master Plan.

Using *Thresholds Guide* screening criteria it was determined that the Project would not cause the Community Plan area to exceed the projected growth in employment for the year of project occupancy/buildout.

Following development of the Project, water service would continue to be provided by the LADWP. The Project would result in a net increase of 55,000 gallons<sup>2</sup> per day over the CSMC Master Plan. The established zoning of [T][Q]C2-2D-O supports the use and density of the Project.

Wastewater from the Project Site is currently treated at the Hyperion Treatment Plant (HTP). The HTP treats wastewater from almost all of the City of Los Angeles, as well as from the Cities of Beverly Hills, Glendale, Culver City, El Segundo, Burbank, San Fernando, Santa Monica, and portions of Los Angeles County and 29 contract agencies.

Using *Thresholds Guide* screening criteria for it was determined that the Project would not produce wastewater flows in a Sewer Capacity Threshold Area; would not produce an increase of more than 4,000 gallons per day; and would not include a change in the land use limitations which would allow greater average daily flows.

The Project would result in a net increase of 50,000 gallons<sup>3</sup> per day over the CSMC Master Plan. The established zoning of [T][Q]C2-2D-O supports the use and density of the Project. The applicant must comply with the provisions of ordinances regarding sewer capacity allotment in the City of Los Angles. The mitigation measures pertaining to water usage would also reduce sewage flows.

<sup>2</sup> Daily water consumption based on 275 gallons per 1,000 square feet. Worst case analysis assumes water consumption to be 110 percent of sewage flow. Source: Bureau of Sanitation. Sewer Facilities Charge, Sewage Generation Factors for Residential and Commercial Categories. Effective June 6, 1996. 3 Based on 250 gallons per 1,000 square feet. Source: Bureau of Sanitation. Sewer Facilities Charge, Sewage Generation Factors for Residential and Commercial Categories. Effective June 6, 1996.

Several mitigation measures pertaining to water usage were included in the Original EIR and as part of the existing Development Agreement. These mitigation measures are:

#### Water

- To the maximum extent feasible, reclaimed water shall be used during the grading and construction of the project for dust control, soil compaction, and concrete mixing.
- The project should incorporate water saving design techniques in order to minimize water requirements. The installation of water conserving plumbing fixtures and City approval of a landscape design plan would be required if the City's water conservation program is still in effect at the time of building permit issuance. If the [program is] no longer in effect, the applicant should still consider the incorporation of these measures into the proposed project, where feasible.
- Water in fountains, ponds, and other landscape features within the proposed project must be treated and filtered to meet City and State health standards. Also, recirculating systems should be used to prevent waste.
- A recirculating hot water system should be used, where feasible.
- Automatic irrigation systems should be set to ensure irrigation during early morning or evening hours to minimize water loss through evaporation.
- Drip irrigation systems should be used for any proposed irrigation system.
- Reclaimed water should be investigated as a source of irrigation for large landscaped areas.
- Selection of drought-tolerant, low-water-consuming plant varieties should be used to reduce irrigation water consumption.
- Low-flow and water conserving toilets, faucets, and showerheads must be installed in new construction and when remodeling.
- Plumbing fixtures should be selected which reduce potential water loss from leakage due to excessive wear of washers.
- · Promptly detect and repair leaks.

#### Sanitary Sewer (Wastewater)

- The applicant must comply with the provisions of ordinances regarding sewer capacity allotment in the City of Los Angeles. In addition, the applicant must comply with Ordinance No. 166,080 which restricts water consumption and which will concurrently reduce sewage flows.
- Measures cited in Section IV.Q.4, Water, [of the Original EIR], which restricts water consumption should be implemented to reduce sewage flows.

Since the time of certification of the Original EIR and adoption of the mitigation measures through the Development Agreement, available water supply and

<sup>4</sup> Based on 250 gallons per 1,000 square feet. Source: Bureau of Sanitation. Sewer Facilities Charge, Sewage Generation Factors for Residential and Commercial Categories. Effective June 6, 1996.

achievement of water conservation continue to be of environmental concern. Legislation enacted since the approval of the Master Plan requires water agencies to prepare and adopt water management plans. The City of Los Angeles Department of Water and Power's (LADWP) Urban Water Management Plan (UWMP), last adopted in 2005, recognizes and accounts for periods of dry conditions and calls for increased water conservation continually through year 2030 to off-set periods of diminished water capacity. LADWP is in the process of adopting updated Water Conservation Devices and Measure for New Development in the City of Los Angeles. It is intended that these requirements would be incorporated into the City's proposed Green Building Ordinance (anticipated for adoption in April 2008), and would therefore become a standard condition requirement for all new development, including the Project. In the interim, the LADWP requests that the proposed water measures be required and incorporated for all discretionary projects under review by Los Angeles Department of City Planning.<sup>5</sup> Many of these water conservation devices and measures are already addressed through the adopted mitigation measures per the Original EIR. Compliance with this City requirement would further reduce the impacts of the Project.

Implementation of standard conditions of approval and the Original EIR's mitigation measures, as well as the collection of service fees/taxes associated with the Project, would reduce the Project's water and wastewater impacts to a less than significant level, and further evaluation is required.

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

**Less Than Significant Impact.** Solid waste from the Project Site is collected by private collection firms contracted directly with the property owner. The private collectors operating in the project area dispose of general refuse at any of four Class III landfills in Los Angels County.

Using *Thresholds Guide* screening criteria for it was determined that the Project would not result in solid waste generation of five tons or more per week above the Master Plan generation rate.

Construction of some of the Master Plan's approved development will involve site preparation (vegetation removal and grading activities) and construction activities, which would generate typical construction debris, including wood, paper, glass, plastic, metals, cardboard, and green wastes. Construction of the Project would result in a net increase in site-generated solid waste of approximately 1,400 pounds<sup>6</sup> per day or 4.9 tons per week over the CSMC Master Plan. Several mitigation measures pertaining to solid waste were included in the Original EIR and as part of the existing Development Agreement. These mitigation measures are:

- Commercial-size trash compactors shall be installed.
- White paper, glass, and metal recycling programs shall be implemented.

<sup>5</sup> Letter to Gail Goldberg, Director of Planning, City Planning Department from H. David Nahai, Chief Executive Officer and General Manager, Los Angeles Department of Water and Power, dated March 6, 2008.

<sup>6</sup> Seven pounds/1000 square feet. Source: City of Los Angeles Bureau of Engineering, April, 1981.

In addition, the Project would comply with all federal, state, and local statutes and regulations related to solid waste. Implementation of standard conditions of approval and the Original EIR's mitigation measures, as well as the collection of service fees/taxes associated with the Project, would reduce the Project's solid waste impacts to a less than significant level, and no further evaluation is required.

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

**No Impact.** The Project would comply with all federal, state, and local statutes and regulations related to solid waste.

In summary, the Original EIR determined that the Master Plan would have less than significant impacts on utilities, including power, natural gas, communication systems, and storm water drainage; however, the Original EIR concluded that the Master Plan would have significant and unavoidable project-level and cumulative impacts on water conservation, sanitary sewers and non-hazardous and hazardous solid waste and disposal. The Project would create no new or substantially increased significant impacts on utilities beyond those analyzed in the Original EIR. As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts on utilities not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

#### 17. MANDATORY FINDINGS OF SIGNIFICANCE.

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
- c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

As identified in Section IV of this Initial Study, the Project has the potential to result in significant impacts to Aesthetics, Air Quality, Noise, and Transportation/Traffic. These issues should be examined in the Project EIR.

# INITIAL STUDY DEPARTMENT OF CITY PLANNING

#### V. COMPATIBILITY WITH EXISTING ZONING AND PLANS

According to the Land Use map for the Wilshire Community Plan General Plan Amendment in September 2001, the Project Site is designated for Regional Commercial land uses. The Project would not change the land use at the site or change the character of the area and would be consistent with the applicable land use plan. Additionally, there would be no off-site land use impacts. Therefore, the project would be compatible with existing zoning and plans.

#### VI. NAMES OF PREPARERS

Planning Associates, Inc.

#### VII. DETERMINATION - RECOMMENDED ENVIRONMENTAL DOCUMENTATION

#### A. Summary

The Project would potentially result in significant impacts to Aesthetics, Air Quality, Noise and Transportation/Traffic.

#### B. <u>Recommended Environmental Documentation</u>

On the basis of this initial evaluation, I find that the Project could have a potentially significant effect on the environment in the areas of Aesthetics, Air Quality, Noise and Transportation/Traffic, and therefore an Environmental Impact Report should be prepared. Further, based on this Initial Study evaluation and consistent with CEQA Guidelines Sections 15162 and 15163, I find that preparation of a Supplemental EIR is appropriate for the Project because the Project's proposed revisions to the approved Master Plan require only major revisions to the Original EIR and the Project would not create either new significant environmental impacts not previously studies in the Original EIR nor a substantial increase in the severity of any significant impact previously identified in the Original EIR. In addition, the circumstances of the Project would not substantially change the circumstances under which the Master Plan was proposed to be undertaken so as to require major revisions of the Original EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Finally, no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Original EIR was certified as complete, meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

Prepared By:			
Approved By:			

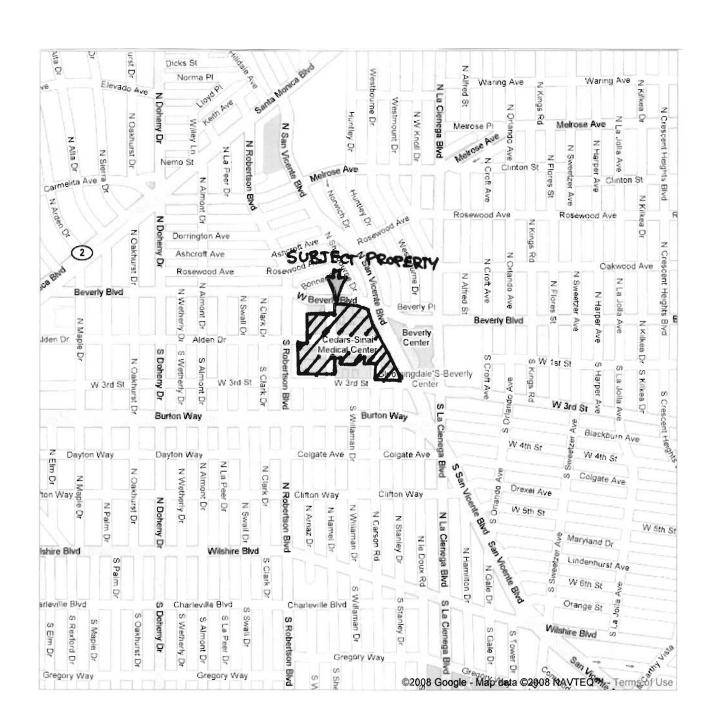
#### **INITIAL STUDY** DEPARTMENT OF CITY PLANNING

#### ATTACHMENTS:

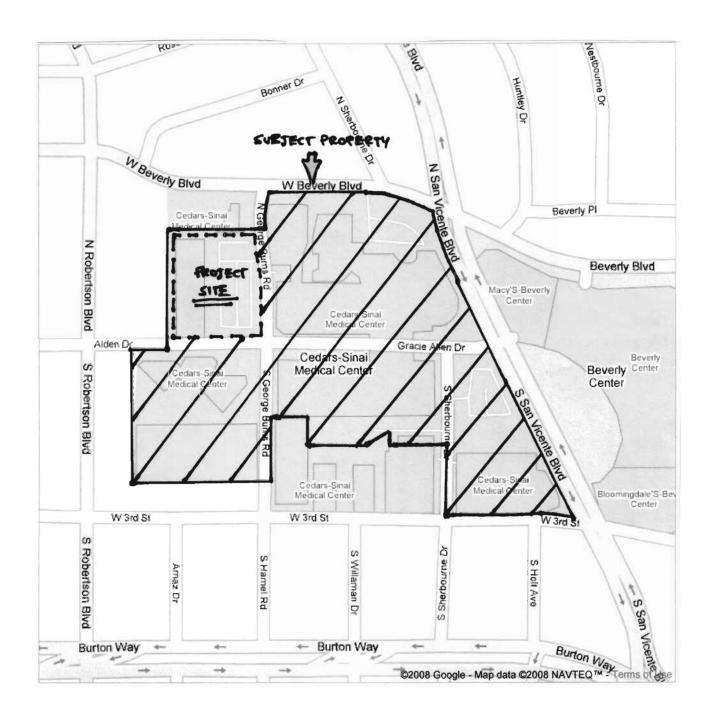
- A. Exhibits

  1. Regional Location Map
  2. Local Vicinity Map
  3. Site Plan
  4. West Tower Plan

#### **EXHIBIT 1: REGIONAL LOCATION MAP**



#### **EXHIBIT 2: LOCAL VICINITY MAP**



# **EXHIBIT 3: SITE PLAN**

# **©** CEDARS-SINAI MEDICAL CENTER

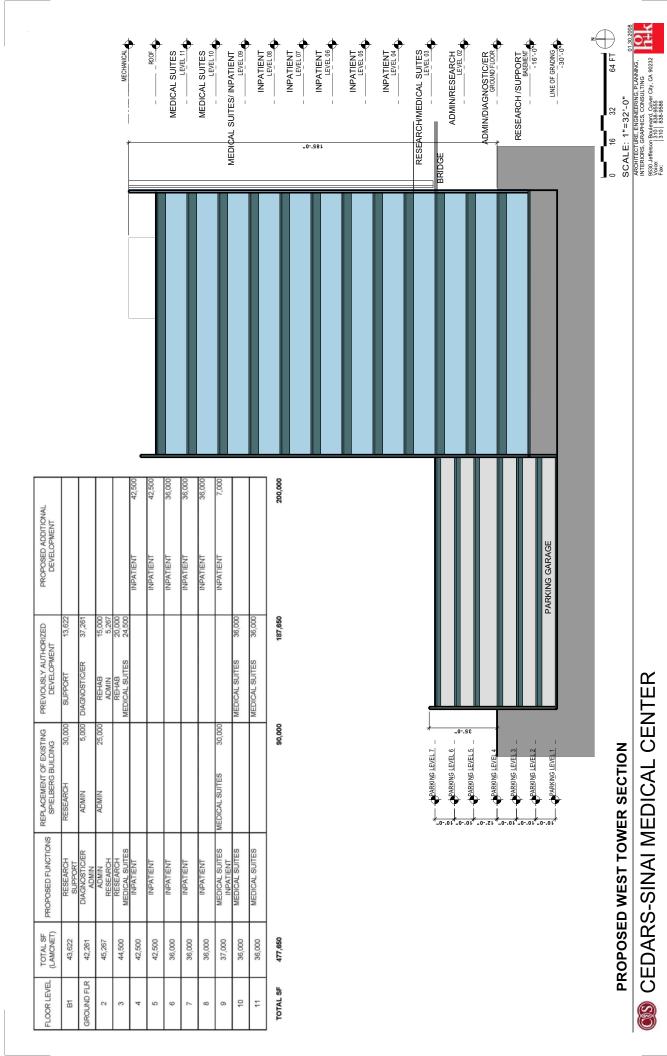
SITE PLAN

SCALE: 1"=70'-0"

ARCHITECTURE ENGINEERING, PLANNING, INTERCARS, GRAPHICS, CONSULTING
9550 Jefferson Boulevart Chive Cry, CA 90222 Fax.

140

# **EXHIBIT 4: WEST TOWER PLAN**



# **APPENDIX A**

# APPENDIX A-3 NOP WRITTEN COMMENTS

# NOTICE OF PREPARATION (NOP) COMMENTS RECEIVED ON THE CEDARS-SINAI MEDICAL CENTER WEST TOWER PROJECT PUBLIC SCOPING PERIOD: MARCH 7, 2008 - APRIL 8, 2008

NOP COMMENT LETTER	NOP COMMENT ISSUE	SEIR RESOLUTION
FEDERAL AND STATE AGENCIES		
Morgan, Scott, California Office of Planning and Research, State Clearinghouse and Planning Unit (OPR/SCH), letter dated 3/10/08	Public Scoping: A 30-day public scoping period is provided	The CEQA process, including the public scoping process, is discussed in <i>Section I: Introduction</i> of this Draft SEIR.
Singleton, Dave, California Native American Heritage Commission (NAHC), letter dated 3/11/08	Cultural Resources: Address cultural resources as required by CEQA	Cultural resources were determined to be less than significant, as discussed in <i>Section VI.A: Effects Not Found to Be Significant</i> of this Draft SEIR.
REGIONAL, COUNTY AND LOCAL AC	GENCIES	
Chapman, Susan, Los Angeles County Metropolitan Transportation Authority (Metro), letter dated 3/18/08	CMP Analysis: Provide transportation impact analysis (TIA) in compliance with the State Congestion Management Program (CMP)	A complete Traffic Impact Analysis (TIA) has been prepared and is attached as Appendix E: Traffic Impact Study of this Draft SEIR. The results of the traffic, parking and transit impact study are presented in Section IV.D: Transportation and Circulation of this Draft SEIR.
Jones, Laverne, Southern California Association of Governments (SCAG), letter dated 3/20/08	Regional Significance: the project is not regionally significant under SCAG's criteria	The Proposed Project is not regionally significant and no further discussion is required. See also <i>Appendix A-2: Initial Study</i> of this Draft SEIR.
Nahai, H. David, Los Angeles Department of Water and Power (LADWP), letter dated 3/6/08	Water Conservation: In accordance with LADWP water conservation goals, the Project must comply with "Water Conservation Devices and Measures for New Development in the City of Los Angeles"	Water conservation and cumulative water supply concerns are discussed in Section IV.E: Cumulative Effects of this Draft SEIR. Other water supply issues are discussed in Section VI.A: Effects Not Found to Be Significant of this Draft SEIR.
Smith, Steve, South Coast Air Quality Management District (SCAQMD), letter dated 3/13/08	Air Quality Analysis: Provide an air quality impact analysis prepared in accordance with SCAQMD guidelines, and provide recommended mitigation measures as appropriate	A complete Air Quality Analysis has been prepared and is attached as <i>Appendix D: Air Quality &amp; Noise Impact Report</i> of this Draft SEIR. The results of the air quality report are presented in <i>Section IV.B: Air Quality</i> of this Draft SEIR.

NOP COMMENT LETTER	NOP COMMENT ISSUE	SEIR RESOLUTION
ORGANIZATIONS AND SPECIAL INTE	EREST GROUPS	
Huynh, Dinh, <b>Robertson Properties Group</b> , letter dated 4/7/08	Shadows: Address shade/shadow	Shade and shadow issues were determined to be less than significant as discussed in Section VI.A: Effects Not Found to Be Significant of this Draft SEIR.
	Site Access: Address driveway access and effects to adjacent businesses	Site access is addressed in the Traffic Impact Analysis, attached as Appendix E: Traffic Impact Study of this Draft SEIR. The results of the traffic, parking and transit study, including a discussion of site access, are presented in Section IV.D: Transportation and Circulation of this Draft SEIR.
	Traffic: Address traffic on Alden Drive	Traffic on local streets is addressed in the Traffic Impact Analysis, attached as Appendix E: Traffic Impact Study of this Draft SEIR. The results of the traffic, parking and transit study, including a discussion of traffic along Alden Drive, are presented in Section IV.D: Transportation and Circulation of this Draft SEIR.
	Loading Docks: Address placement of truck docks, trash containment areas, and ambulatory access and effect on adjacent businesses	Loading docks and similar facilities are addressed throughout the Draft SEIR relative to aesthetics, noise, access and air quality issues.
	Construction Activities: Address noise and dust effects on local businesses	Construction activities are addressed throughout this Draft SEIR, including effects on local business relative to aesthetics, noise, access and air quality issues.
	Toxic Waste: address on-site storage for toxic wastes	Toxic waste issues were determined to be less than significant, as discussed in Section VI.A: Effects Not Found to Be Significant of this Draft SEIR.

NOP COMMENT LETTER	NOP COMMENT ISSUE	SEIR RESOLUTION
Lake, Laura, <b>Lake &amp; Lake Consulting, Inc.</b> , letter dated 4/2/08	Parking: Evaluate adequacy of parking for the Project and the CSMC Campus	Parking is addressed in the Traffic Impact Analysis, attached as Appendix E: Traffic Impact Study of this Draft SEIR. The results of the traffic study, including a discussion of parking, are presented in Section IV.D: Transportation and Circulation of this Draft SEIR.
	Liquefaction: Identify if the Project is in a liquefaction zone	Liquefaction issues were determined to be less than significant, as discussed in Section VI.A: Effects Not Found to Be Significant of this Draft SEIR.
	General Plan Compliance: Address adequacy determination of public infrastructure per the Los Angeles General Plan	General Plan consistency issues, including consistency with public infrastructure policies, were determined to be less than significant, as discussed in Section VI.A: Effects Not Found to Be Significant of this Draft SEIR. However, cumulative infrastructure issues are discussed in Section IV.E: Cumulative Effects of this Draft SEIR.
	Community Plan Consistency: Address the level of service policies per the Wilshire Community Plan	Community Plan consistency issues, including consistency with level of service policies, were determined to be less than significant, as discussed in Section VI.A: Effects Not Found to Be Significant of this Draft SEIR. However, Project-related roadway level of service is addressed in the Traffic Impact Analysis and discussed in Section IV.D: Transportation and Circulation of this Draft SEIR.
	Traffic: Address "cut through" traffic on adjacent residential streets	Traffic on local streets is addressed in the Traffic Impact Analysis, attached as Appendix E: Traffic Impact Study of this Draft SEIR. The results of the traffic, parking and transit study, including a discussion of "cut through" traffic, formally known as residential street segment analysis, is presented in Section IV.D: Transportation and Circulation of this Draft SEIR.

NOP COMMENT LETTER	NOP COMMENT ISSUE	SEIR RESOLUTION
Strudler, Martin, West Hollywood West Residents Association (WHWRA), letter dated 4/2/08	Parking: Provide information/evaluation of employee parking	Parking is addressed in the Traffic Impact Analysis, attached as Appendix E: Traffic Impact Study of this Draft SEIR. The results of the traffic study, including a discussion of parking, are presented in Section IV.D: Transportation and Circulation of this Draft SEIR.
	Street Parking: Address the loss of existing on-street parking	Parking is addressed in the Traffic Impact Analysis, attached as Appendix E: Traffic Impact Study of this Draft SEIR. The results of the traffic study, including a discussion of parking, are presented in Section IV.D: Transportation and Circulation of this Draft SEIR.
	Traffic: Address cumulative traffic and congestion at local intersections	Cumulative traffic levels and traffic on local streets is addressed in the Traffic Impact Analysis, attached as Appendix E: Traffic Impact Study of this Draft SEIR. The results of the traffic study, including a discussion of cumulative traffic, are presented in Section IV.D: Transportation and Circulation of this Draft SEIR.
	Groundwater Table: Address effects to the local groundwater table and the uses in the Project vicinity	Groundwater issues were determined to be less than significant, as discussed in Section VI.A: Effects Not Found to Be Significant of this Draft SEIR.
	Construction: Address truck haul routes and the effect on adjacent residential streets	Construction activities are addressed throughout this Draft SEIR, including effects on local street traffic.
	Alternatives: Address alternatives that would reduce impacts on surrounding residential uses	Alternatives are addressed in Section V: Alternatives of this Draft SEIR.



#### STATE OF CALIFORNIA

# GOVERNOR'S OFFICE of PLANNING AND RESEARCH

#### STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT DIRECTOR

#### **Notice of Preparation**

March 10, 2008

To:

Reviewing Agencies

Re:

Cedars-Sinai Medical Center ENV 2008-0620-EIR

SCH# 2008031040

Attached for your review and comment is the Notice of Preparation (NOP) for the Cedars-Sinai Medical Center ENV 2008-0620-EIR 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:

Adam Villani City of Los Angeles 200 No. Spring Street Room 750 Los Angeles, CA 90012

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
Project Analyst, State Clearinghouse

Attachments cc: Lead Agency

#### **Document Details Report** State Clearinghouse Data Base

2008031040 SCH#

Cedars-Sinai Medical Center ENV 2008-0620-EIR Project Title

Los Angeles, City of Lead Agency

> NOP Notice of Preparation Type

Increasing existing land use entitlements at the medical center by 200,000 square feet. The new Description

square footage will be contained within a proposed 477,650 square foot inpatient facility.

**Lead Agency Contact** 

Adam Villani Name

City of Los Angeles Agency

213 978-1472 Phone

email

200 No. Spring Street **Address** 

Room 750

Los Angeles City

State CA Zip 90012

Fax

**Project Location** 

Los Angeles County

City

Region

Beverly Boulevard and San Vicente **Cross Streets** 

Parcel No.

Range Township

Section

Base

**Proximity to:** 

Highways

**Airports** 

Railways

Waterways

Schools

Land Use

Aesthetic/Visual; Agricultural Land; Air Quality; Noise; Traffic/Circulation; Cumulative Effects Project Issues

Reviewing Agencies Resources Agency; Office of Historic Preservation; Department of Parks and Recreation; Department

of Water Resources; Native American Heritage Commission; Office of Emergency Services;

Department of Fish and Game, Region 5; California Highway Patrol; Caltrans, District 7; Air Resources

Board, Major Industrial Projects; Integrated Waste Management Board; Department of Toxic

Substances Control; Regional Water Quality Control Board, Region 4

Date Received

03/10/2008

Start of Review 03/10/2008

End of Review 04/08/2008

Note: Blanks in data fields result from insufficient information provided by lead agency.

NOP DISTRIBUTION LIST		County: Co Angeles	SCT#	H 0 1 0 0 0 0 0 0 0
esources Agency	Fish & Game Region 2 Jeff Drongesen	S	Caltrans, District 8 Dan Kopulsky	Regional Water Quality Contro
Resources Agency	Fish & Game Region 3 Robert Floerke	Santa Monica Bay Restoration Guangyu Wang	Caltrans, District 9 Gayle Rosander	Board (RWVCCB)
Nadell Gayou  Dept. of Boating & Waterways David Johnson	Fish & Game Region 4 Julie Vance		Caltrans, District 10 Tom Dumas	RWQCB 1 Cathleen Hudson North Coast Region (1)
California Coastal Commission Elizabeth A. Fuchs	Fish & Game Region 5  Don Chadwick  Habitat Conservation Program	Tahoe Regional Planning Agency (TRPA) Cherry Jacques	Caltrans, District 11 Jacob Armstrong Caltrans, District 12	Environmental Document Coordinator
Colorado River Board Gerald R. Zimmerman	Fish & Game Region 6 Gabrina Gatchel Habitat Conservation Program	Business, Trans & Housing	Ryan P. Chamberlain	San Francisco Bay Region (2)  RWQCB 3  Central Coast Region (3)
Dept. of Conservation Sharon Howell	Fish & Game Region 6 I/M Gabrina Getchel	Aeronautics Sandy Hesnard	Air Resources Board	RWQCB 4 Tenera Bodgere
California Energy Commission Dale Edwards	Inyo/Mono, Habitat Conservation Program	Caltrans - Planning Terri Pencovic	Airport Projects Jim Lerner	Los Angeles Region (4)  RWQCB 5S
Cal Fire Allen Robertson	George Isaac Marine Region	California Highway Patrol Shirley Kelly Office of Special Projects	Transportation Projects Ravi Ramalingam	Central Valley Region (5)  RWQCB 5F  Central Valley Bosion (5)
Office of Historic Preservation	Other Departments	Housing & Community Development	Mike Tollstrup	Fresno Branch Office
Wayne Donaldson  Dept of Parks & Recreation	Food & Agriculture Steve Shaffer Dept, of Food and Agriculture	Lisa Nichols Housing Policy Division	California Integrated Waste Management Board	Central Valley Region (5) Redding Branch Office
Environmental Stewardship Section	Depart, of General Services	Dept of Transportation	Sue O'Leary  State Water Resources Control	RWQCB 6 Lahontan Region (6)
Central Valley Flood Protection Board Mark Herald	Dept. of General Services Robert Sleppy	Caltrans, District 1	Board Regional Programs Unit Division of Financial Assistance	RWQCB 6V Lahontan Region (6)
S.F. Bay Conservation & Dev't. Comm. Steve McAdam	Environmental Services Section  Dept. of Health Services Veronica Mallov	rex Jackman  Caltrans, District 2  Marcelino Gonzalez	State Water Resources Control Board	RWQCB 7 Colorado River Basin Region (7)
Dept. of Water Resources Resources Agency Nadell Gayou	Dept. of Health/Drinking Water Independent Commissions. Boards	Caltrans, District 3 Jeff Pulverman Caltrans, District 4	Student Intern, 401 Water Quality Certification Unit Division of Water Quality	RWQCB 8 Santa Ana Region (8) RWQCB 9
Conservancy	Delta Protection Commission Debby Eddy	Tim Sable  Caltrans, District 5	Steven Herrera Division of Water Rights	San Diego Region (9)
sh and Game	Office of Emergency Services Dennis Castrillo	Caltrans, District 6	CEQA Tracking Center	
Depart, of Fish & Game Scott Flint Environmental Services Division	Governor's Office of Planning & Research State Clearinghouse	Moses Sittes  Caltrans, District 7  Vin Kumar	Department of Pesticide Regulation	
Fish & Game Region 1 Donald Koch	Native American Heritage Comm.			Last Updated on 03/03/2008
Fish & Game Region 1E Laurie Harnsberger	Deudle Headway			

ish and Game Depart, of Fish & Gan

NOP DISTRIBUTION

Resources Agency

#### NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364 SACRAMENTO, CA 95814 (916) 653-6251 Fax (916) 657-5390 www.nanc.ca.gov ds\_nahc@pacbell.net



March 11, 2008

Mr. Adam Villani

#### **Los Angeles City Planning Department**

200 North Sprig Street, 7th FloLos Angeles, CA 90012, CA 92553

Re: SCH# 2008031040; CEQA Notice of Preparation (NOP) draft Environmental Impact Report (DEIR) for the Cedars-Sinai Medical Center Project, ENV2008-0620-EIR; Los Angeles County, California

Dear Mr. Villani:

Thank you for the opportunity to comment on the above-referenced document. The Native American Heritage Commission is the state agency designated for the protection of California's Native American cultural resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR per the California Code of Regulations § 15064.5(b)(c) (CEQA Guidelines). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE),' and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action: √ Contact the appropriate California Historic Resources Information Center (CHRIS). Contact information for the 'Information Center' nearest you is available from the State Office of Historic Preservation in Sacramento (916/653-7278). The record search will determine:

- If a part or the entire (APE) has been previously surveyed for cultural resources.
- If any known cultural resources have already been recorded in or adjacent to the APE.
- If the probability is low, moderate, or high that cultural resources are located in the APE.
- If a survey is required to determine whether previously unrecorded cultural resources are present.

 $\sqrt{}$  If an archaeological inventory survey is required, the final stage is the preparation of a professional report

detailing the findings and recommendations of the records search and field survey.

- The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure.
- The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

√ Contact the Native American Heritage Commission (NAHC) for:

- A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity who may have information on cultural resources in or near the APE. Please provide us site identification as follows: USGS 7.5-minute quadrangle citation with name, township, range and section. This will assist us with the SLF.
- Also, we recommend that you contact the Native American contacts on the attached list to get their input on the effect of potential project (e.g. APE) impact. In many cases a culturally-affiliated Native American tribe or person will be the only source of information about the existence of a cultural resource.

 $\sqrt{\ }$  Lack of surface evidence of archeological resources does not preclude their subsurface existence.

- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f)of the California Code of Regulations (CEQA Guidelines). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

 $\sqrt{\text{Lead}}$  agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigations plans.

CEQA Guidelines §15064.5(d) requires the lead agency to work with the Native Americans identified by
this Commission if the Initial Study identifies the presence or likely presence of Native American human
remains within the APE. CEQA Guidelines provide for agreements with Native American groups,
identified by the NAHE, to ensure the appropriate and dignified treatment of Native American human
remains and any associated grave goods.

Health and Safety Code §7050.5, Public Resources Code §5097.98 and CEQA Guidelines §15064.5(d) mandate procedures to be followed in the event of an accidental discovery of any human remains in a

location other than a dedicated cemetery.

 $\sqrt{\text{Lead}}$  agencies should consider avoidance, as defined in CEQA Guidelines §15370 when significant cultural resources are discovered during the course of project planning or execution.

Please feel free to contact me at (916) 653-6251 if you have any questions.

10

Sincerely,

Dave Singleton Program Analyst

Attachment: Native American Contact List.

Cc: State Clearinghouse

## Native American Contacts Los Angeles County March 11, 2008

LA City/County Native American Indian Comm Ron Andrade, Director 3175 West 6th Street, Rm. 403 Los Angeles , CA 90020 (213) 351-5324 (213) 386-3995 FAX

Ti'At Society
Cindi Alvitre
6515 E. Seaside Walk, #C Gabrielino
Long Beach , CA 90803
calvitre@yahoo.com
(714) 504-2468 Cell

Tongva Ancestral Territorial Tribal Nation John Tommy Rosas, Tribal Admin.

tattnlaw@gmail.com 310-570-6567 Gabrielino Tongva

Gabrieleno/Tongva San Gabriel Band of Mission Anthony Morales, Chairperson PO Box 693 Gabrielino Tongva San Gabriel CA 91778 ChiefRBwife@aol.com (626) 286-1632 (626) 286-1758 - Home (626) 286-1262 Fax Gabrielino/Tongva Council / Gabrielino Tongva Nation
Sam Dunlap, Tribal Secretary
761 Terminal Street; Bldg 1, 2nd floor Gabrielino Tongva
Los Angeles , CA 90021
office @tongvatribe.net
(213) 489-5001 - Officer
(909) 262-9351 - cell
(213) 489-5002 Fax

Gabrielino Tongva Indians of California Tribal Council
Robert Dorame, Tribal Chair/Cultural Resources
5450 Slauson, Ave, Suite 151 PMB Gabrielino Tongva
Culver City CA 90230
gtongva@verizon.net
562-761-6417 - voice
562-925-7989 - fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American with regard to cultural resources for the proposed sCH#2008031040; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Dedars-Sinai Medical Center; ENV2008-0620-EIR; Los Angeles City Planning Department; Los Angeles County, California.



and the second

## Metro

March 18, 2008

Mr. Adam Villani Environmental Review Section Department of City Planning 200 N. Spring Street, Room 750 Los Angeles, CA 90012 RECEIVED CITY OF LOS ANGELES

MAR 20 2008

ENVIRONMENTAL UNIT

Dear Mr. Villani:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Cedars-Sinai Medical Center project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

A Traffic Impact Analysis (TIA), with highway, freeway, and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2004 Congestion Management Program for Los Angeles County", Appendix D. 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); and
- 2. 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.

Among the required steps for the analysis of development-related impacts to transit are:

- 3. Evidence that in addition to Metro, all affected Municipal transit operators received the NOP for the Draft EIR;
- 4. A summary of the existing transit services in the area;
- 5. Estimated project trip generation and mode assignment for both morning and evening peak periods;
- 6. Documentation on the assumptions/analyses used to determine the number and percentage of trips assigned to transit;
- 7. Information on facilities and/or programs that will be incorporated into the development plan that will encourage public transit usage and transportation demand management (TDM) policies and programs; and
- 8. An analysis of the expected project impacts on current and future transit services along with proposed project mitigation.

Metro looks forward to reviewing the Draft EIR. If you have any questions regarding this response, please call me at 213-922-6908 or by email at chapmans@metro.net. Please send the Draft EIR to the following address:

Metro CEQA Review Coordination One Gateway Plaza MS 99-23-2 Los Angeles, CA 90012-2952 Attn: Susan Chapman

Sincerely,

Susan Chapman

Program Manager, Long Range Planning



# ASSOCIATION of GOVERNMENTS

#### **Main Office**

818 West Seventh Street 12th Floor Los Angeles, California 90017-3435

> t (213) 236-1800 f (213) 236-1825

www.scag.ca.gov

#### Officers

President
Gary Ovitt, San Bernardino County

First Vice President Richard Dixon, Lake Forest

Second Vice President Harry Baldwin, San Gabriel

Immediate Past President Yvonne B. Burke, Los Angeles County

#### **Policy Committee Chairs**

Administration Ronald O. Loveridge, Riverside

Community, Economic and Human Development Jon Edney, El Centro

Energy and Environment Debbie Cook, Huntington Beach

Transportation and Communications Alan D. Wapner, Ontario RECEIVED CITY OF LOS ANGELES

MAR 25 2008

ENVIRONMENTAL UNIT

Mr. Adam Villani Environmental Review Section Department of Cit Planning 200 N. Spring, Room 750

Los Angeles, CA 90012

RE: SCAG Clearinghouse No. I 20080141 Cedars-Sinai Medical Center

Dear Mr. Villani:

March 20, 2008

Thank you for submitting the **Cedars-Sinai Medical Center** for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Cedars-Sinai Medical Center+**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **March 1-15, 2008** Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1857. Thank you.

Sincerely,

LAVERNE JONES, Planning Technician

Program Development and Evaluation Division

## Department of Water and Power



ANTONIO R. VILLARAIGOSA

Commission
NICK PATSAOURAS, President
EDITH RAMIREZ, Wee President
LEE KANON ALPERT
WALLY KNOX
FORESCEE HOGAN-ROWLES
BARBARA E. MOSCHOS, Secretary

H. DAVID NAHAI, Chief Executive Officer and General Manager

> RECEIVED CITY OF LOS ANGELES

March 6, 2008

MAR 25 2008

ENVIRONMENTAL UNIT

Ms. S. Gail Goldberg
Director of Planning
City Planning Department
Room 525, City Hall
200 N. Spring Street
Los Angeles, California 90012

Dear Ms. Goldberg:

Subject: Request for Increased Water Conservation Measures in New Construction

As you are aware, water supply issues have been of growing concern. Last year, the City of Los Angeles received the lowest rainfall on record; our own Los Angeles Aqueduct supply from the Eastern Sierra was at near record lows, and snowpack for the rest of California was also well below normal. In addition, a Federal Court ruling last year has resulted in reduced exports from the Delta to the State Water Project, the major source of supply to the Metropolitan Water District of Southern California, who we have increasingly relied upon to meet our water supply needs.

Continued significant development in the City of Los Angeles has generated concern for sufficient water supplies to meet increasing needs. Our Urban Water Management Plan (UWMP), last adopted in 2005, recognizes and accounts for periods of dry conditions and also anticipates both population growth and increased water demands. In light of the recent events, we have been undergoing a closer examination of steps the City must undertake to achieve the water supply goals of the UWMP in order to have a sustainable water supply for the City.

The 2005 UWMP calls for increased water conservation continually through 2030, which is as far as the plan forecasts. Conservation goals are broken down to 5-year increments. By 2010, the plan calls for 5,000 acre-feet per year of additional water conservation savings.

In order to achieve the anticipated water conservation savings identified in the UWMP, we are requesting that all new construction that is subject to discretionary review and approval by your Department require the inclusion of water conserving

Water and Power Conservation ... a way of life

Ms. S. Gail Goldberg Page 2 March 6, 2008

measures identified in the enclosure to this letter. LADWP has proposed that the same requirements be part of the City's proposed Green Building Ordinance, but we believe we must implement these water-conserving measures immediately, which are necessary to meet our conservation goals.

We are requesting that you require the enclosed list of conservation measures as part of your approval process for all new construction.

Thank you for assisting us to meet the required water conservation goals to ensure adequate water supplies for the future.

If you have any questions, please contact me at (213) 367-1388 or Mr. Thomas M. Erb, Director of Water Resources, at (213) 367-0873.

Sincerely,

H. David Nahai

Chief Executive Officer and General Manager

JGY:lsf

Enclosure

c/enc: Ms. Nancy H. Sutley, Mayor's Office

Mr. Thomas Rothmann, City Planning EIR Unit

Mr. Jimmy Liao, City Planning EIR Unit

Mr. Hadar Plafkin, City Planning EIR Unit

√Mr. David Somers, City Planning EIR Unit

Mr. Enrique C. Zaldivar, Director, Bureau of Sanitation

Mr. Adel H. Hagekhalil, Bureau of Sanitation

Mr. Doug Walters, Bureau of Sanitation

Mr. Varouj Abkian, Bureau of Sanitation

Mr. Andrew A. Adelman, General Manager, Department of Building and Safety

Mr. Amir S. Tabakh, Department of Building and Safety

Mr. Michael D. Tharpe, Department of Building and Safety

Mr. Thomas M. Erb

## WATER CONSERVATION DEVICES AND MEASURES FOR NEW DEVELOPMENT IN THE CITY OF LOS ANGELES

- High efficiency toilets (1.28 gallons per flush or less, includes dual flush)
- High efficiency urinals (0.5 gallons per flush or less, includes waterless)
- Restroom faucet flow rate of 1.5 gallons per minute or less
- Public restroom self-closing faucets
- Showerhead flow rate of 2.0 gallons per minute or less
- · Limit of one showerhead per shower stall
- High efficiency clothes washers (water factor of 6.0 or less)
- High efficiency dishwashers (Energy Star rated)
- Domestic water heating system located in close proximity to point(s) of use, as feasible;
   use of tankless and on-demand water heaters as feasible
- Cooling towers must be operated at a minimum of 5.5 cycles of concentration
- Require onsite water recycling systems for wastewater discharge for commercial laundries, dye houses, food processing, certain manufacturing operations, etc. (subject to a payback threshold of five years or less). Mandate water recycling system for all new car wash facilities.

Note: Recycling often offers thermal (energy saving) benefits in addition to water savings.

Recycled water can be reused as process water, and cooling tower or boiler make-up

Strict prohibition of single-pass cooling

Note: Single pass cooling refers to the use of potable water to extract heat from process equipment (e.g. vacuum pump, ice machine) by passing the water through the equipment and discharging the heated water to the sanitary wastewater system.

- Irrigation system requirements
  - o Weather-based irrigation controller with rain shutoff
  - Flow sensor and master valve shutoff (large landscapes)
  - o Matched precipitation (flow) rates for sprinkler heads
  - Drip/microspray/subsurface irrigation where appropriate
  - o Minimum irrigation system distribution uniformity of 75 percent
  - Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials
  - Use of landscape contouring to minimize precipitation runoff
- Metering
  - All dwelling units/commercial spaces require individual metering and billing for water use
  - All irrigated landscapes of 5,000 square feet or more require separate metering or submetering
- Mandated use of recycled water (where available) for appropriate end uses (irrigation, cooling towers, sanitary)
- Standard Urban Stormwater Mitigation Plan (SUSMP). Compliance with all City of Los Angeles SUSMP requirements, and encouraging implementation of Best Management Practices that have stormwater recharge or reuse benefits. For more information, visit http://www.lastormwater.org/Siteorg/businesses/susmp/susmpintro.htm.

March 13, 2008

Mr. Adam Villani Environment Review Section Department of City Planning 200 N. Spring Street, Room 750 Los Angeles, CA 90012

Dear Mr. Villani:

# Notice of Preparation of a Draft Environmental Impact Report (Draft EIR) for the Cedars-Sinai Medical Center Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft environmental impact report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. In addition, please send with the draft EIR all appendices or technical documents related to the air quality analysis and electronic versions of all air quality modeling and health risk assessment 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. Alternatively, the lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2007 Model. This model is available on the SCAQMD Website at: <a href="https://www.urbemis.com">www.urbemis.com</a>.

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 developed a methodology for calculating PM2.5 emissions from construction and operational activities and processes. In connection with developing PM2.5 calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM2.5 emissions and compare the results to the recommended PM2.5 significance thresholds. Guidance for calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the following internet address: <a href="http://www.aqmd.gov/ceqa/handbook/PM2\_5/PM2\_5.html">http://www.aqmd.gov/ceqa/handbook/PM2\_5/PM2\_5.html</a>.

ras Pasa kan Pasa ya Maran Maran

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's 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 significance 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 <a href="http://www.aqmd.gov/ceqa/handbook/LST/LST.html">http://www.aqmd.gov/ceqa/handbook/LST/LST.html</a>.

It is recommended that lead agencies for projects generating or attracting vehicular trips, especially heavy-duty dieselfueled vehicles, 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 on the SCAQMD's CEQA web pages at the following internet address: <a href="http://www.aqmd.gov/ceqa/handbook/mobile\_toxic/mobile\_toxic.html">http://www.aqmd.gov/ceqa/handbook/mobile\_toxic/mobile\_toxic.html</a>. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

**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 significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: <a href="https://www.aqmd.gov/ceqa/handbook/mitigation/MM\_intro.html">www.aqmd.gov/ceqa/handbook/mitigation/MM\_intro.html</a> Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. 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: <a href="http://www.aqmd.gov/prdas/aqguide/aqguide.html">http://www.aqmd.gov/prdas/aqguide/aqguide.html</a>. In addition, guidance on sitting incompatible land uses 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: <a href="http://www.arb.ca.gov/ch/handbook.pdf">http://www.arb.ca.gov/ch/handbook.pdf</a>. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

**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 World Wide Web Homepage (<a href="http://www.aqmd.gov">http://www.aqmd.gov</a>).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Charles Blankson, Ph.D., Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely, barren Red on be half of

Steve Smith, Ph.D.

Program Supervisor, CEQA Section

Planning, Rule Development and Area Sources

SS:CB:AK LAC080307-08AK Control Number



April 7, 2008

Via Email and U.S. Mail
120 N. ROBERTSON BLVD.

LOS ANGELES, CA 90048-3102

PRONE: 310.652,3620 FAX: 310.652.8538

Adam Villani Environmental Review Coordinator **Environmental Review Section** Department of City Planning 200 N. Spring Street, Room 750 Los Angeles, CA 90012 Adam. Villani@lacity.org

Re:

Proposed Development of New Inpatient/Medical Support Facility by Cedars-Sinai Medical Center (DEIR ENV 2008-

0620-EIR)

Dear Mr. Villani:

The Decurion Corporation ("Decurion") hereby submits the following comments to the City of Los Angeles Department of City Planning ("City") regarding Cedars-Sinai Medical Center's ("CSMC") proposed development of an inpatient/medical support facility at the northwest corner of Gracie Allen Drive and George Burns Road ("Proposed Project"). The site of the Proposed Project is located due east and adjacent to an office building owned by Decurion.

In addition to the areas identified by the City in its March 7, 2008, Notice of Preparation and Public Scoping Meeting, we would like to request that the City evaluate several additional issues in connection with the Draft Environmental Impact Report ("DEIR") for the Proposed Project. These include:

- Current massing and placement of the Proposed Project's 185 foot high tower may cast shadows onto Decurion's property during the morning hours.
- The Proposed entrance to the parking structure will be on Alden Drive immediately adjacent to Decurion's existing parking entrance and truck We would like the DEIR to study the potential for traffic congestion in this location in relation to Decurion's existing parking entrance and truck dock.

- The Proposed Project's parking structure will accommodate 700 stalls compared to the 285 stalls on the existing lot, which may further increase traffic on Alden Drive. We believe this issue should be studied as part of the DEIR.
- The Proposed Project has not identified the location or scope of any truck dock or any trash/ambulatory facilities. These issues need to be carefully studied to determine appropriate placement of these facilities to minimize impacts to adjacent properties.
- Noise and dust control during construction is of concern. How do you intend to mitigate these issues?
- The City should consider the possibility of a restriction to ensure any storage of toxic waste is located outside the setback area of the Proposed Project in order to minimize impacts to adjacent properties.

We commend CSMC for introducing the Proposed Project, and we look forward to a design that is compatible with and integrates into the surrounding community.

Please feel free to contact me if you have any questions regarding our comments. I can be reached at 310.854.8734.

Sincerely,

Dinh Huynh

Robertson Properties Group,

Representing Agent of

The Decurion Corporation

cc: Elisa L. Paster, Esq. – Paul, Hastings, Janofsky & Walker John Manavian, VP of Development – Robertson Properties Group David Hokanson, VP of Development – Robertson Properties Group



Laura Lake, Ph.D. President 1557 Westwood Blvd. #235, LA, CA 90024 Iaura.lake@gmail.com (310) 470-4522

April 2, 2008

Adam Villani Environmental Review Section Department of City Planning 200 N. Spring St. Room 750 Los Angeles, CA 90012

RE: NOP COMMENTS FOR CEDARS EXPANSION (ENV 2008-0620-EIR)

Dear Mr. Villani:

Thank you for this opportunity to comment on the environmental impacts of the proposed Cedars expansion. I am submitting these comments in behalf of my client, Burton Way Foundation.

Cedars is an important member of our community and we want to assure that they can continue to meet our needs. We do, however, have several specific questions and concerns:

## Parking:

In reviewing the proposal, I've pieced together parking from various components and it appears to be significantly underparked, ranging from 105 spaces short to over 1000 spaces. To accurately assess parking on the campus it would be helpful to provide a **parking table for each component** of the built and proposed structures, indicating current code parking requirements and the number of spaces provided. Parking requirements have been increased since the original buildings, so there may be a very large shortfall which would be most unfortunate.

## Liquefaction:

The Environmental Assessment states that there is no liquefaction hazard, but the ZIMAS map shows the site to be a liquefaction zone. Please explain.

## Compliance with the General Plan:

Please provide analysis of the adequacy of the city's infrastructure to accommodate

this and cumulative projects. The Planning Department is supposed to provide an analysis of public services at least every ten years. Such a study has not been provided, to my knowledge, and thus it is impossible to know if there is adequate capacity.

## Compliance with the Wilshire Community Plan:

The Wilshire Community Plan, requires that the City must make findings for zone changes and height district changes regarding traffic capacity shown in the box below. Specifically, LOS D is defined as adequate traffic capacity. The mandatory findings or a statement of overriding consideration must be provided as discussed below.

Objective 16-1 Comply with Citywide performance standards for acceptable Levels of Service (LOS) and ensure that necessary Freeway, Highway and Street access and improvements are provided to accommodate additional traffic anticipated from Wilshire Community Plan land use changes and/or by new development.

#### Policies

16-1.1 Maintain a satisfactory Level of Service (LOS) above LOS "D" for Class II Major Highways, especially those which serve Regional Commercial Centers and Community Commercial Centers; and above LOS "D" for Secondary Highways and Collector Streets.

**Objective 16-2** Ensure that the location, intensity and timing of development is consistent with the provision of adequate transportation infrastructure.

#### **Policies**

16-2.1 No increase in density shall be effected by zone change, plan amendment, subdivision or any other discretionary action, unless the Decision-makers make the following findings or a statement of overriding considerations:

#### 111-37

The transportation infrastructure serving the project site and surrounding area, specifically the Freeways, Highways, and Streets presently serving the affected area within the Wilshire Community Plan, have adequate capacity to accommodate the existing traffic flow volumes, and any additional traffic volume which would be generated from projects enabled by such discretionary actions.

**Program:** Decision-makers shall adopt findings with regard to infrastructure adequacy as part of their action on discretionary approvals of projects which could result in increased density or intensity.



## Analyze Cut-Through Traffic

Also, please analyze the impacts of additional project related and cumulative traffic on adjacent residential streets (spillover/cut-through traffic).

Thank you for your consideration in advance.

Sincerely yours,

# Lara Late

Laura Lake, Ph.D. President

cc: Lisa Trifiletti, CD5

Jeff Haber, Esq.

Harald R. Hahn, Burton Way Foundation



WHWRA PO Box 691427 West Hollywood, CA 90069

April 2, 2008

Mr. Adam Villani Environmental Review Coordinator City of Los Angeles, Department of City Planning Environmental Review Section 200 North Spring Street, Room 750 Los Angeles, CA 90012

### RE: CEDARS-SINAI MEDICAL CENTER EIR SCOPING MEETING — COMMENTS

Dear Mr. Villani.

Thank you very much for inviting West Hollywood West residents to take part in the scoping meeting on March 27, 2008 at Cedars. We appreciate the opportunity to comment.

Given the requests for a zone change, increased FAR and the addition of 200,000 square feet not previously attached to the parcel, we feel it is essential that a comprehensive environmental review of the project with the proposed changes be conducted.

Specifically, we ask that the new EIR address:

- 1. Parking: The project proposes 700 spaces for 100 beds, but does not disclose how many employees will be required and where they will park. Will employee parking be allowed on-site? If not, will it be provided off-site with a shuttle, or will employees be left to find street parking? The space-per-thousand formula for this kind of facility does not appear to have been met so we feel it requires further study.
- 2. Removal of public parking spaces: Plans call for the removal of several parking spots on Beverly Boulevard in the City of West Hollywood. This would drastically affect businesses on Beverly Boulevard, which have no off-street parking and rely on street parking for their survival. Is there any plan to replace lost spaces? We assume that the proposed parking structure on the Cedars property is not for "public" use.
- 3. Traffic and circulation: Previously proposed projects in the area (e.g., Chasens-Bristol Farms) did surveys of traffic impacts in a one-mile radius around their proposals, and included mitigations (signals, restriping, dedicated turns, etc.). Since the proposed project is just two blocks away from the second worst intersection in Los Angeles -- Beverly Boulevard and La Cienega (the worst is Westwood/Wilshire), a new traffic and circulation study with mitigations is vital.

- 4 Hydrology (subterranean parking): Plans call for a 7-story structure, with 3 floors below ground utilizing a "bathtub" model for construction. This has been done before in the neighborhood (Sofitel Hotel) and resulted in raising the water table in the adjacent residential neighborhood from 10-feet to 3-feet. Have hydrological studies been done? If ground water is encountered, how will it be removed? Is the sewer system capacity great enough to handle the removal of ground water AND the requirements of a large medical services structure?
- 5. Staging: Truck routes and delivery and storage of materials are of vital concern to the residential area to the north. Staging should be on-site, and trucks routed away from local commercial and residential streets.
- 6. Alternative proposals to the 400,000+ square foot proposal, which would have less impact on the surrounding residential areas.

The new EIR should also study cumulative impacts of the project itself as well as consider surrounding projects, particularly in terms of construction. There are six major projects being proposed, approved and in the pipeline or currently under construction, within a one-mile radius of the proposed Cedars project, including another building on the Cedars campus fronting San Vicente Boulevard and Sherbourne Drive. The other projects include: (a) the 150 unit residential project on the former Cedars property known as the Sherbourne Triangle, between Sherbourne and San Vicente just north of the proposed construction; (b) the "Red Building" at the Pacific Design Center, which is 3 blocks north; (c) Beverly Place, a 4-story mixed-use project 2 blocks west; (d) another 150 unit mixed used project on La Cienega at Westmourn Drive; and (e) the "Melrose Triangle" project at Doheny and Santa Monica. All of these have 24-month construction terms.

Lastly, as the existing EIR for the Cedars' campus is from 1993 and the validity of this document today is questionable (particularly considering that the surrounding area has changed so dramatically in recent years), we feel that a new and complete EIR is warranted.

We appreciate your time and, again, thank you for including us in this process.

Sincerely,

Martin Strudler

Cedars Expansion Committee Chair

Martin Studler

West Hollywood West Residents Association

Cc: Oscar Delgado, Director of Public Works - City of West Hollywood Lauren Meister, President - West Hollywood West Residents Association

# **APPENDIX A**

# APPENDIX A-4 PUBLIC SCOPING MEETING COMMENTS

## Cedars-Sinai Medical Center **EIR Scoping Meeting Comments**

Please use this sheet to let us know what environmental issues you would like the Draft Environmental Impact Report (DEIR) to study and also any questions or concerns you may have.

(If necessary, please use the reverse side of the paper.)	
you would like to be on the City of Los Angeles mailing distribution list for correspondence regarding the roposed project, please fill out your contact information below. Otherwise, you may choose to submit the	ų
Name: MARTIN STRUDLER.	SN
Organization (if you are representing only)  Address: 403 WEST BOURNE DRIVE  City: MSTHOLLYWOOD State: (A STHOLLYWOOD State: (A STHOLLYWOOD)  Email Address: MSTRUDUJE W AOL, COM Phone: 310-652-78 68  Email Address: MSTRUDUJE W AOL, COM Phone: 310-652-78 68	<u> </u>
Email Address: MSTRUDITE ADL. Compenses Phone:	
You may drop your comments if the commental Review Coordinator  Adam Villani, Environmental Review Coordinator City of Los Angeles, Department of City Planning Environmental Review Section 200 North Spring Street, Room 750 Los Angeles, CA 90012 Los Angeles, CA 90012 Email: Adam. Villani@lacity.org Ph: (213) 978-1472 Fex. (213) 978-1343	

FROM : MARTIN STRUDLER PHONE NO. : 3106577868

Apr. 03 2008 02:01AM P1