

IV. ENVIRONMENTAL IMPACT ANALYSIS

1. EIR IMPACT METHODOLOGY

Consistent with CEQA, the analysis in this Draft SEIR supplies the minor additions or changes necessary to make the Original EIR adequately apply to the Master Plan, as amended and/or revised by the Project, which is the “net change” in impacts resulting from the addition of 100 inpatient beds and ancillary services (equivalent to 200,000 square feet of floor area for additional medical center uses) and a 700-space adjoining parking structure, and demolition of the Existing Building. The analysis employs a three-tiered approach that considers:

- 1) Impacts, set in the context of current baseline, related to demolition of the 90,000 square-foot Existing Building and the adjacent Existing Parking Lot on the Project Site, followed by construction and operation of the entire West Tower (460,650 square feet + 7-level, 700-space parking structure) at the Project Site in target Year 2023;
- 2) Incremental change of CSMC Campus Master Plan impacts due to the net impact of the Project (100 inpatient beds and ancillary services within approximately 200,000 square feet of floor area and a 700-space adjoining parking structure); and
- 3) Comparison of impacts identified in the certified 1993 Original EIR relative to those defined through this SEIR.

2. ANALYSIS SECTION FORMAT

Each topical analysis section is organized and defined as provided below.

Introduction - provides a brief explanation of the “scope” of the analysis section and identifies key references used for the section analysis.

Environmental Conditions – provides an overview of the existing conditions and defines the baseline (see *Section III.C: Project Baseline* of this Draft SEIR) relevant to the scope of the particular environmental topic. The Environmental Conditions section is subdivided into three sections:

Physical Setting – provides a description of the applicable physical conditions at the Project Site and surrounding area, and may include information related to the existing land uses, structures and operational characteristics of those existing developments.

Regulatory and Policy Setting – provides information about policies, procedures, regulations and requirements that were in place at the time the NOP was published and/or were in effect at the time the Master Plan, Development Agreement and/or Zoning conditions were approved in 1993, and would be applicable to the proposed Project.

CSMC Campus Background and Approvals – provides a brief summary of the relevant information and conclusions from the Original EIR and applicable provisions of the

Development Agreement, as amended in 2007 (*See Appendix C: 1993 CSMC Development Agreement*). This discussion is intended to provide context for the significance determinations.

Environmental Impacts – provides the three-tiered analysis (as described above) and an assessment of the cumulative impacts. The Environmental Impacts section has four subsections:

Methodology – summarizes the methods, procedures and techniques used to estimate Project impacts.

Thresholds of Significance – identifies and explains the thresholds of significance and any additional criteria used to determine the significance of the Project’s impacts.

Project Impacts – discusses the potential impacts of the Project. A summary of the Original EIR’s conclusions are provided as needed to clarify the impact discussion.

Cumulative Impacts – discusses the extent to which the Project may create cumulative impacts.

Mitigation Program – where it is determined that the Project would generate potentially significant impacts, mitigation measures are recommended that would reduce the level of those potential impacts. The Mitigation Program includes a combination of standard conditions of approval (“SCAs”), mitigation measures carried forward from the approval of the Master Plan, and additional mitigation measures to address the incremental “net” impact of the Project.

PDFs and SCAs – CEQA Guidelines, Section 15126.4(A), states “The discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed...which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project.” This SEIR distinguishes between Project Design Features (“PDFs”), which are features incorporated into the design of the Project to minimize or avoid adverse impacts, and Standard Conditions of Approval (“SCAs”), which are imposed by the City or by regulatory agencies. PDFs and SCAs, as used herein, are defined more specifically as follows:

Project Design Features - PDFs are specific design and/or operational characteristics proposed by the Project Applicant that are incorporated into the Project to avoid or reduce its potential environmental effects. Because PDFs are incorporated into the Project, they do not constitute mitigation measures. Even so, PDFs are incorporated into the Mitigation Program to ensure that they are implemented as a part of the Project.

Standard Conditions of Approval - SCAs are existing requirements and standard conditions that are based on local, state, or federal regulations or laws that are frequently required independently of CEQA review and serve to offset or prevent specific impacts. Typical standard conditions and requirements include compliance with the provisions of the Uniform Building Code, South Coast Air Quality Management District Rules, local agency fees, etc. The City may impose additional conditions during the approval process,

as appropriate. Because SCAs are neither Project specific nor a result of development of the Project Site, they are not considered to be either PDFs or Mitigation Measures. However, since these regulations are required by law, they will be incorporated as part of the Mitigation Monitoring and Reporting Program to ensure compliance.

Previous Mitigation (Carried Forward) – These mitigation measures from the Original EIR and approval of the Master Plan continue to bind implementation of the Master Plan, and therefore, would bind Project development. Those mitigation measures already completed under the Master Plan will not be required for the proposed Project.

Additional Project Mitigation Measures – Some mitigation measures from the Original EIR remain applicable to the Project, but may require modification to update the measure to meet current situational needs. Modified Mitigation Measures are written to provide an equivalent, or more effective, level of mitigation than that provided by the original measure. Additional mitigation measures are recommended when the Project would result in a significant environmental effect even taking the PDFs, applicable SCAs and previous mitigation measures into account.

Level of Significance After Mitigation – provides a summary of the significance conclusions regarding the Project's impacts after implementation of all mitigating measures.

3. REFERENCES AND RESOURCES

The background information and analyses to support this Draft SEIR are based on a combination of CSMC Campus-wide studies from previous environmental studies and current site-specific technical reports. Information used also includes collaboration with resource agencies and various regional policy documents and reference materials. Key relevant EIR-level technical studies are included as Technical Appendices to this SEIR, unless they were previously incorporated into the Original EIR, which is on file with the City of Los Angeles. Engineering-level documents may be found with the City of Los Angeles Department of Building and Safety. Other more general or published documents may be obtained through the authoring agency.

The Original EIR, Cedars-Sinai Medical Center Master Plan EIR No. 90-0643(ZC)(HD) (SCH No. 90010839), is incorporated herein by reference, as are the Zone Change and Height District Ordinance, and the Master Plan and Development Agreement, as amended, all of which are on file with the City of Los Angeles. Interested persons can review these documents at City of Los Angeles, Department of City Planning, Environmental Review Section located at City Hall, 200 N. Spring Street, Room 750, Los Angeles, California 90012. In addition, two key policy planning documents are referenced throughout this Draft SEIR and provide a critical understanding of the context of the Project. These policy planning documents are:

City of Los Angeles General Plan and Framework – State law requires that local and municipal governments prepare and enforce a comprehensive general plan document, and that land use development be guided by and conforms to the general plan. The General Plan of the City of Los Angeles is a policy document originally adopted in 1974 that serves as a comprehensive strategy for long-term growth and development in the City and is the primary land use plan for the City. The General Plan was updated and refined through adoption of the General Plan

Framework Element in 1995, and re-adopted in August 2001. The Framework Element sets forth a citywide comprehensive long-range growth strategy. It defines citywide policies that will be implemented through subsequent amendments of the City's community plans, zoning ordinances, and other pertinent programs. The General Plan is on file with the City of Los Angeles Planning Department and available online through the City's Planning website at <http://cityplanning.lacity.org/>.

Wilshire Community Plan – As discussed in *Section III: General Overview of the Environmental Setting* of this Draft EIR, the Project Site is located within the Wilshire Community Plan area. The Wilshire Community Plan (update adopted September 19, 2001), a component of the General Plan, is the primary planning document for the project site area. The Community Plan implements city-wide land use policy standards of the General Plan, as well as establishes specific policies to address the unique character of the Wilshire District community. The Community Plan is on file with the City of Los Angeles Planning Department and available online through the City's Planning website at <http://cityplanning.lacity.org/>.

The analysis in this Draft EIR 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*), as well as 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)).

A complete list of References used for this Draft SEIR is provided in *Section VIII: References*.