IV. ENVIRONMENTAL IMPACT ANALYSIS

E. CUMULATIVE EFFECTS

1. INTRODUCTION

Pursuant to CEQA Guidelines Section 15130(a), "an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." As defined in CEQA Guidelines Section 15064(g)(1), "'cumulatively considerable' means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, effects of other current projects, and the effects of probable future projects."

Analysis in this SEIR complies with CEQA Guidelines Section 15130(b)(1), which states that the analysis may consider either a list of past, present, and probable future projects, and may use a summary of projections contained in an adopted general plan or related planning document, or in a previously adopted EIR.

2. CUMULATIVE IMPACTS OF RELATED PROJECTS

By itself, the proposed Project does not represent significant growth for the Project area. However, when combined with the Related Projects, some cumulative impacts may occur. A list and location map of the Related Projects in the Cities of Los Angeles, Beverly Hills and West Hollywood are provided in *Section III.B: Related Projects*. New Related Project development would create a number of condominium, apartment, retail and office buildings in the area, which would foster new residents, businesses and business patrons. In the City of Los Angeles, Related Projects are anticipated to result in an additional approximately 35,800 square feet of office space, 546,915 square feet of retail space,[1] 8,400 square feet of museum space, 80,240 square feet of school space, 14,940 students, 192 seats in restaurants, 17 hotel rooms, 566,650 square feet of medical space,[2] 139,200 square feet of self-storage space, and 2,086 dwelling units within 14 condominiums and 9 apartment buildings within the Project area.[3] However, the proposed Project, as a medical facility, without a residential or commercial component, is not anticipated to contribute substantially to the increased residential or commercial populations brought about by the Related Projects. As determined in the Initial Study (see *Appendix A-2: Initial Study*), the proposed Project would not result in significant impacts for most environmental issues. These findings can be reasonably applied to the cumulative impact contribution of the Project for those same impacts. The issues that were found to have potentially significant Project impacts, including Aesthetics, Air Quality, Noise and Transportation and Circulation,[4] are discussed for

[1] "Retail space" includes restaurants, fast food establishments, and auto body shops.
[2] "Medical space" includes construction of the Advanced Health Sciences Pavilion and construction of the remaining 170,650 square feet of floor area under the Master Plan (to be incorporated into the West Tower) on the CSMC Campus.
[3] A list of Related Projects is provided in *Section III.B: Related Projects* of this Draft SEIR.
[4] Traffic impacts at two study intersections in the Project area were found to be significant, but could be mitigated to less than significant levels as discussed in *Section IV.D: Transportation and Circulation*. These impacts are discussed in this section because although mitigation is feasible, the Lead Agency may choose not to allow implementation and/or the City of West Hollywood (jurisdiction over one intersection) may choose not to cooperate with implementation.

cumulative effects in *Section IV: Environmental Impact Analysis* of this Draft SEIR and have been found to have less than significant cumulative effects, due to the incremental effect of the proposed Project, with implementation of recommended mitigation measures.

The Original EIR determined that implementation of the Master Plan, in combination with development of related projects in 1993, would result in an increased number of services and suppliers supporting the projected growth of commercial and retail enterprises. It can be reasonably assumed that this growth has already occurred or will occur by the build-out year of the proposed Project in 2023. Based on the analysis of environmental issues in the Initial Study (see *Appendix A-2: Initial Study*) and *Section IV: Environmental Impact Analysis* of this SEIR, the proposed Project, which does not contain any residential or commercial components, is not anticipated to incrementally or substantially contribute to growth caused by current Related Projects. Additionally, as the Project area is substantially built-out with established infrastructure, the proposed Project and the Related Projects would not introduce unplanned infrastructure that would induce unplanned development in the area. There would be additional employment (primarily medical-related) generated by the Project; however, this additional employment is not anticipated to induce the creation of new housing or businesses in the area beyond the current Related Projects. Further, it can be reasonably argued that the proposed Project is itself a beneficial and mitigating component of cumulative effects because the addition of medical services, including the additional 100 new inpatient beds and ancillary services, will serve the growing demand for medical services as the area's population increases.

The Original EIR concluded that the implementation of related projects in 1993 would result in an increased demand for public services and utilities, which may become inadequate over time. However, it was anticipated that necessary expansions of the infrastructure would occur to accommodate future growth. The same scenario applies to the proposed Project and the current Related Projects, which will contribute to a cumulative impact on public services and utilities in the Project area.

The Original EIR concluded that significant cumulative impacts would occur for public services and utilities in the Project area. Specifically, because the Master Plan development was determined to result in an unavoidable adverse significant impact for fire protection, police protection, water supply, sewer system capacity, and solid waste disposal, the Master Plan would also incrementally contribute to significant cumulative impacts related to the provision of these services and utilities. The following analysis of cumulative effects focuses on the net cumulative effect due to the incremental increase in demand for these public services and utilities generated by the Project.

a. Public Services

(1) Fire Protection

There are three Los Angeles Fire Department (the "LAFD") fire stations within an approximately 3-mile radius of the CSMC Campus. According to the CEQA Thresholds Guide, and as summarized in the Initial Study (see *Appendix A-2: Initial Study*), the maximum response distance for a Truck and Engine company to a Commercial Center is 1 mile and 0.75 miles,

respectively.[5] However, per access and building requirement mitigation measures implemented from the Original EIR under the Master Plan, which will be carried forward for the proposed Project, fire protection impacts have been reduced to less than significant levels. Additionally, there are thirteen fire hydrants located within or adjacent to the CSMC Campus, which the LAFD has determined to be sufficient and adequate for the CSMC Campus.[6] The Project Site and several of the Related Projects are not located in a brush fire hazard area or hillside and the proposed Project will not involve the use of substantial concentrations of toxic or combustible substances. The Related Projects, consisting mostly of commercial, retail, and residential uses are also not anticipated to involve the use of substantial concentrations of toxic or combustible substances, if any. CSMC also has a Disaster Response Plan on file with the City of Los Angeles.

According to the City of Los Angeles General Plan Framework EIR ("Framework EIR"), implementation of the General Plan was anticipated to result in a significant cumulative impact relative to fire services within the Wilshire Community Plan, as well as most Community Plan Areas. However, although the General Plan was anticipated to generate increased land use density in Community Plan Areas that already have shortages of service availability or high risk fire areas, full implementation of the policies contained in the General Plan Framework would reduce cumulative impacts of development to a level below significant, relative to fire services. These Framework Plan policies include:[7]

Policies 3.3.2 directs monitoring of infrastructure and public service capacities to determine need within each Community Plan Area for improvements based upon planning standards. This policy also directs determinations of the level of growth that should correlate with the level of capital, facility, or service improvement that are necessary to accommodate that level of growth. In addition, the policy directs the establishment of programs for infrastructure and public service improvements to accommodate development in areas the General Plan Framework targets for growth. Lastly, the policy requires that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure and services.

Policy 7.10.1 focuses available implementation resources in targeted areas or "communities in need."

Policy 9.17.1 addresses the monitoring and forecasting of demand for existing and future fire facilities and service for the purpose of assuring that every neighborhood would have the necessary level of fire protection service and infrastructure.

Policies 9.18.1 through **9.18.4** and **9.19.1** address the issue of achieving a goal for the highest level of service at the lowest possible cost to meet existing and future demand. Specific issues covered in this set of policies include: completion of current fire service capital

[5] City of Los Angeles, *L.A. CEQA Thresholds Guide* (Los Angeles: City of Los Angeles, 2006), p. K.2-2.
[6] Lynn McClain, meeting regarding Advanced Health Sciences Pavilion requirements, Los Angeles, California, March 2008.
[7] City of Los Angeles, *Los Angeles Citywide General Plan Framework Draft Environmental Impact Report* (Los Angeles: City of Los Angeles, 1995), p. 2.10-15.

improvements; identifying and prioritizing areas of insufficient fire facilities; land acquisition for fire station sites in areas deficient in these facilities; ordinance related actions pertaining to fire protection services; and advance planning for fire station site funding and construction.

Policies 9.20.1 through **9.20.3** address issues related to the LAFD's ability to assure public safety in emergency situations. Specific issues covered by these policies incude: mutual aid and assistance agreements; special fire-fighting units for unique situations; and preparation of contingency plans for emergencies and disasters.

The Project is not anticipated to affect the fire services and coverage area of the bordering cities of Beverly Hills and West Hollywood, as fire service jurisdiction for the Project is entirely within the City of Los Angeles. Further, the implementation of mitigation measures carried forward from the Original EIR under the Master Plan would apply to the proposed Project and the West Tower will meet OSHPD standards, thus reducing the Project's fire service impact contribution to the overall cumulative impacts in the Project area. The West Tower's conformance with all applicable laws and regulations, as well as the collection of service fees/taxes for the Project and all Related Projects would further reduce potential cumulative impacts. Increased cumulative traffic from City of Los Angeles Related Projects, totaling an approximately 69,438 additional daily trip ends to the Project area, however, may affect accessibility of emergency vehicles on the street network, but the approximately 1,181 daily trip ends associated with the proposed Project would not contribute substantially to this potential cumulative impact.

(2) Police Protection

With regards to police protection, the proposed Project is located within the Los Angeles Police Department's (the "LAPD") Wilshire Area, in Reporting District 7. The Related Projects are anticipated to create approximately 1,641 new retail, 143 new office, and 26 new hotel employment opportunities, among additional museum, school and medical employment opportunities, as well as approximately 6,957 new residents in the area.[8] According to the Framework EIR, "there is no appropriate threshold by which to quantify impacts relative to police station square footage adequacy"[9]; however, it can be assumed that any increase in population could potentially have an impact to police services and coverage. The Framework EIR projects the General Plan build-out demand in the City for sworn officers in year 2010 (without expansion of services) will yield a shortfall of 8,856 sworn officers citywide in relation to projected need for officers, with a shortage of 923 sworn officers in the Wilshire Community Plan Area specifically.[10] Updates to the Los Angeles General Plan can be expected to account for increasing populations and would yield a proportionately similar shortfall of sworn officers in 2023 (Project build-out year), at which time an expansion of services would be required (as

[8] City of Los Angeles, *L.A. CEQA Thresholds Guide* (Los Angeles: City of Los Angeles, 2006), p. K.1-3. Based on the *Police Service Population Conversion Factors* table. Assumes all new apartments to be single, one-, and two-bedroom units and all new condominiums to be three- and four-bedroom units.
[9] City of Los Angeles, *Los Angeles Citywide General Plan Framework Draft Environmental Impact Report* (Los Angeles: City of Los Angeles, 1995), p. 2.11-6.
[10] City of Los Angeles, *Los Angeles Citywide General Plan Framework Draft Environmental Impact Report* (Los Angeles: City of Los Angeles, 1995), p. 2.11-4.

funded by the City General Fund). Although the General Plan would generate additional population within the City that would generate additional demand for police services, full implementation of the policies contained in the General Plan Framework would reduce cumulative impacts of development to a less than significant level, relative to police services. These Framework Plan policies include:[11]

Policy 3.3.2 directs the monitoring of infrastructure and public service capacities to determine need within each Community Plan Area for improvements based upon planning standards. This policy also directs determinations of the level of growth that should correlate with the level of capital, facility, or service improvement that are necessary to accommodate corresponding levels of growth. In addition, the policy directs the establishment of programs for infrastructure and public service improvements to accommodate development in areas the General Plan Framework targets for growth. Lastly, the policy requires that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure and services.

Policy 5.4.2 directs that police sub-station facilities in the ground floor of mixed use buildings (not including maintenance for jail facilities).

Policy 7.10.1 focuses available implementation resources in targeted areas or "communities in need."

Policies 9.14.1 through **9.15.7** address the need to identify and monitor conditions that would require additional police services and facilities. These policies also address the issue of completing all funded capital facilities projects in as short a time as possible and minimize the time required to establish needed facilities to service the existing facilities.

Policy 9.15.4 addresses the design of police facilities to serve the needs of law enforcement.

Policies 9.16.1 and **9.16.2** address public safety and emergency situations through maintaining established mutual assistance agreements with other law enforcement services and ensure the LAPD's continued emergency planning.

The Project is not anticipated to affect the police services and coverage area of the bordering cities of Beverly Hills and West Hollywood, as police jurisdiction for the Project is entirely within the City of Los Angeles. Additionally, according to the LAPD, COMPSTAT Unit, violent crimes have decreased in the Wilshire District by 10% since 2007 and 16% since 2006, and property crimes have decreased by 11% since 2007 and 12% since 2006.[12] Further, from 2004 to 2007, the number of violent crimes in Reporting District 701 of the Wilshire District (which encompasses the Project Site) have decreased by 71% and the number of property crimes have

[11] City of Los Angeles, *Los Angeles Citywide General Plan Framework Draft Environmental Impact Report* (Los Angeles: City of Los Angeles, 1995), p. 2.11-6.
[12] Los Angeles Police Department, COMPSTAT Unit, *COMPSTAT Wilshire Area Profile 04/06/08 – 05/03/08*, http://www.lapdonline.org/assets/pdf/wilprof.pdf (May 6, 2008).

decreased by 41%.[13] Decreasing rates of crime in the Project area would help to lessen impacts from Related Projects on existing police services.

Finally, according to Condition 3.2.d of the 1993 Development Agreement, "Cedars-Sinai Medical Center shall make available up to 1,500 square feet of floor area at a location to be determined by Cedars-Sinai within the Property for a permanent LAPD sub-station . . . subject to the acceptance and approval thereof by the Los Angeles Police Department and The Los Angeles City Council."[14] This police sub-station has been made available to the LAPD on an annual basis by CSMC, but has not been accepted by the LAPD, and potential implementation of the sub-station will further reduce the Project's cumulative impact contribution. The CSMC Campus also has an existing private security network, including security guards and closed-circuit cameras, which will integrate the proposed Project during the construction and operation periods. Therefore, taking into consideration the implementation of appropriate police service mitigations on a citywide basis, decreasing crime rates in the Wilshire area, availability of a police sub-station on the CSMC Campus, Project integration into an existing private security network on the CSMC Campus, and the collection of service fees/taxes needed to support public services from all Related Projects, cumulative impacts would be reduced. Increased cumulative traffic from City of Los Angeles Related Projects, totaling an approximately 69,438 additional daily trip ends in the Project area, however, may affect accessibility of police vehicles on the street network, but the approximately 1,181 daily trip ends associated with the proposed Project would not contribute substantially to this potential cumulative impact.

b. Utilities

The most readily observable cumulative impact to utilities would be on water conservation and supply. The Original EIR concluded that increased water consumption due to the Master Plan development would result in a significant adverse impact. As a result, the Original EIR required the following mitigation measures:

- To the maximum extent feasible, reclaimed water shall be used during the grading and construction phases 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 programs are no longer in effect, the applicant should still consider the incorporation of these measures into the proposed project, where feasible.

[13] Los Angeles Police Department, *PACMIS Report #10, Selected Crimes and Attempts by Reporting District*, 2005 – 2008. "Violent crimes" include robbery, homicide/murder, rape, and aggravated assault. "Property crimes" include burglary, burglary from a vehicle, auto theft, bicycle theft, grand theft auto, and other theft. Information received from David Lee, LAPD, Discovery Section.
[14] See *Appendix C: 1993 CSMC Development Agreement*.

- 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 insure 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 shower heads 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.

These previously adopted mitigation measures would be required for the Project. In addition, the Project will implement a variety of "sustainable strategies" design and operational features (i.e., PDFs), as described in *Section II.F: Project Characteristics* of this Draft SEIR, that would directly reduce Project-related water use. For example, storm water within the Property, including at the Project Site, is collected, filtered and re-used for landscaping irrigation within the CSMC Campus, thereby reducing water and energy consumption.

According to the City of Los Angeles Department of Water and Power ("LADWP"), on a cumulative basis, "[c]ontinued significant development in the City of Los Angeles has generated concern for sufficient water supplies to meet increasing needs."[15] Due to low rainfalls and a recent Federal Court ruling that 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), which has been increasingly relied upon to meet Los Angeles' water supply needs, the LADWP has requested that all new construction in the City that is subject to discretionary review and approval by the City Planning Department require the inclusion of certain water conservation mitigation measures.[16] These mitigation measures would help achieve goals of DWP's 2005 Urban Water Management Plan ("UWMP") to increase water conservation continually through

[15] City of Los Angeles, Department of Water and Power, *Request for Increased Water Conservation Measures in* New Construction, letter to Ms. S. Gail Goldberg, Director of Planning, dated March 6, 2008.
[16] *Ibid*.

the year 2030. Implementation of some or all of these measures within all Related Projects and the proposed Project, as feasible, would be anticipated to ensure that cumulative impacts on water supply are reduced to less than significant levels. These water conservation mitigation measures were formalized by the City Planning Department and, as applicable to the Project, include the following:

MM CUM-1: Unless otherwise required and to the satisfaction of the Department of Building and Safety, the Applicant shall install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.

MM CUM-2: Unless otherwise required and to the satisfaction of the Department of Building and Safety, the Applicant shall install restroom faucets with a maximum flow rate of 1.5 gallons per minute.

MM CUM-3: As otherwise restricted by state or federal regulations, single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat form process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system).

MM CUM-4: Unless otherwise required, all restroom faucets shall be of a self-closing design, to the satisfaction of the Department of Building and Safety.

MM CUM-5: In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:

- Weather-based irrigation controller with rain shutoff;
- Matched precipitation (flow) rates for sprinkler heads;
- Drip/microspray/subsurface irrigation where appropriate;
- Minimum irrigation system distribution uniformity of 75 percent;
- Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials; and
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for irrigated landscape areas totaling 5,000 sf and greater, to the satisfaction of the Department of Building Safety.

In summary, the proposed Project and the Related Projects in the area have the potential to result in cumulative impacts related to public services (i.e., fire protection and police protection) and utilities (i.e., water supply and water conservation). The Original EIR determined that the Master Plan would result in unavoidable adverse significant impacts for fire protection, police

protection, water supply, sewer system, and solid waste disposal. These project-related significant impacts were anticipated to incrementally contribute to significant cumulative impacts related to the provision of these services and utilities. The proposed Project was determined to have less than significant impacts on public services and utilities and, thus, is not anticipated to significantly contribute to the already significant cumulative impacts determined in the Original EIR for the Master Plan. The net incremental cumulative impacts of the proposed Project in combination with all Related Projects relative to public services and utilities would further be reduced to less than significant levels with implementation of Project-specific mitigation measures, citywide General Plan Framework mitigation measures, and compliance with all applicable laws and regulations.