DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

CEDARS-SINAI MEDICAL CENTER WEST TOWER PROJECT ENV 2008-0620-EIR SCH # 2008031040

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TABLE OF CONTENTS

TABLE OF CONTENTS (CONTINUED)

TABLE OF CONTENTS (CONTINUED)

APPENDICES
(UNDER SEPARATE COVER)

LIST OF FIGURES

FIGURE

LIST OF FIGURES (CONTINUED)

FIGURE

LIST OF TABLES

TABLE

0. EXECUTIVE SUMMARY

In accordance with the California Environmental Quality Act ("CEQA") Guidelines Section 15123, this Draft Supplemental Environmental Impact Report ("SEIR") contains a brief summary of the proposed project, the proposed actions, areas of controversy known to the lead agency and issues to be resolved, and a summary of significant impacts and proposed mitigation measures or alternatives that would reduce or avoid those effects. Detailed information regarding the proposed project and its potential environmental effects are provided in the following sections of this Draft SEIR. This Draft SEIR has been prepared by the City of Los Angeles (the "City" or "Lead Agency") to analyze and disclose the potential impacts of the proposed Project to amend the Cedars-Sinai Medical Center ("CSMC") Master Plan (the "Master Plan"), as proposed by CSMC (the "Applicant"), in their application dated February 19, 2008.

A. PROJECT SUMMARY

1. LEAD AGENCY AND APPLICANT

The City of Los Angeles is the Lead Agency for the preparation of this Draft SEIR; all inquiries regarding the Draft SEIR should be directed to the City. Key contacts are as follows:

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2. PROJECT DESCRIPTION OVERVIEW

In 1993, the City approved a Zone and Height District Change, Development Agreement and Master Plan for the addition of 700,000 square feet of medical center and related uses to the then existing CSMC Campus, located on approximately 24.1 net acres of land at 8720 Beverly Boulevard in the City of Los Angeles, pursuant to a certified EIR. In connection with implementation of the Master Plan, the Applicant is proposing revisions to the Master Plan to improve the efficiency of CSMC's use of its property and to add 100 inpatient beds to be accommodated within 200,000 square feet of floor area (the "Project").[1] A detailed description of the Project is provided in *Section II: Project Description* of this Draft SEIR. The Project is an

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

amendment to the previously approved Master Plan development analyzed in the EIR and certified by the City in 1993 (the "Original EIR"), and is not an entirely new project.

The approved Master Plan includes a component to construct a 127,500 square-foot building (the "Approved Building") and a 650-space parking structure with four sub-grade levels (the "Approved Parking Structure") at the northwest corner of George Burns Road and Gracie Allen Drive (the "Project Site") on the CSMC Campus, which have not been built. The Master Plan also includes demolition of the existing surface parking lot (the "Existing Parking Lot") at the Project Site to accommodate the development of the Approved Building and Approved Parking Structure.

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 of new medical center uses) within a proposed 460,650 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, 170,650 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 an existing building at 8723 Alden Drive (the "Existing Building") to be demolished for the West Tower. To date, approximately 133,350 square feet of infill development has occurred at the CSMC Campus. An additional 396,000 square feet of vested development rights will be used for the Advanced Health Sciences Pavilion (the "Pavilion") (construction to start first quarter 2009). 170,650 square feet is the balance of development rights available after construction of the Pavilion. The 200,000 square feet of new floor area within the proposed Project thus represents the "net" Project analyzed in this Draft SEIR.

The West Tower is anticipated to be 11 stories and 185 feet high. An attached seven-level parking structure (three subterranean levels, one level at grade and three levels above grade) that will provide approximately 700 parking spaces, will also be constructed at the Project Site. Since approval of the Master Plan, the Approved Parking Structure has been redesigned to be a free-standing structure with only three subterranean levels, and to include 50 additional parking spaces. Figures showing the proposed site plan are provided in *Section II: Project Description* of the Draft SEIR.

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.

Thus, in summary, the proposed Project consists of the following elements:

- Addition of 100 new inpatient beds and ancillary services totaling 200,000 new square feet of floor area for medical uses;
- Demolition of the 90,000 square-foot Existing Building; and
- Construction of a 7-level (700 space) parking structure;

This Draft SEIR's analyses include implementation of certain components of the Master Plan at the Project Site (demolition of the Existing Parking Lot, development of the remaining 170,650 square feet of entitlement and the Approved Parking Structure) and replacement of existing uses (the Existing Building) in addition to Project development. However, the significance determinations are based on the impacts of the Project's revisions to the Master Plan (i.e., the Project) and the analyses will examine the incremental impact of the Project beyond those impacts that were previously determined for the approved Master Plan development.

Implementation of the Project would require various approvals, including but not limited to: approval of a Zone Change and Height District Change to revise the conditions of the current [T][Q]C2-2D-O zoning designation and an amendment to the existing Development Agreement and Master Plan to permit an additional 100 inpatient beds and ancillary services (equivalent to 200,000 square feet), and parking on the CSMC Campus. The Project includes requests for the following entitlements and approvals:

- Zone Change to amend the conditions of the [T][Q]C2-2D-O zoning designation and 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 amend 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;

- Any other necessary discretionary or ministerial permits and approvals required for the construction or operation of the Project.

The Project will incorporate many "sustainable" or "green" strategies that target sustainable site development, water savings, energy efficiency, green-oriented materials selection, and improved indoor environmental quality. Implementation of a variety of design and operational features (i.e., Project Design Features ["PDFs"])[2] into the Project to achieve energy conservation, water efficiency and other sustainable practices, will directly and proactively reduce impacts to noise, air quality, traffic and waste. Specific "sustainable strategies" incorporated into the Project are identified in *Section II.F: Project Characteristics* of this Draft SEIR.

[2] 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. The role of PDFs in this analysis is discussed in *Section IV: Environmental Impact Analysis* of this Draft SEIR.

0. EXECUTIVE SUMMARY

B. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

Section 15123 of the CEQA Guidelines requires that an EIR identify areas of controversy and issues to be resolved which are known to the Lead Agency, including issues raised by other agencies and the public. Potential areas of controversy and issues to be resolved by the City's decision-makers include those environmental issue areas where the potential for a significant unavoidable impact has been identified and/or an area where community concerns elevate the project's perceived effects beyond reasonable threshold criteria.

Areas of controversy associated with the Project are made known through comments received during the Notice of Preparation ("NOP") process (see *Section I.A: Environmental Review Process* of this Draft SEIR), as well as input solicited during the public scoping meeting and an understanding of the community issues in the Project area. Areas of known controversy, including issues raised by some members of the community are: neighborhood intrusion; traffic trip generation and roadway capacity; traffic circulation and the potential for "cut-through" traffic in surrounding neighborhoods; congestion to local business accesses; on-site parking supply; loss of on-street parking spaces; construction-related traffic, noise, dust and air quality impacts; adequacy of public services and infrastructure; and the effect on the local water table. The areas of known controversy noted above are analyzed, either directly or as indirect (secondary) effects, in *Section IV: Environmental Impact Analysis*, and/or in *Appendix A-2: Initial Study*. In addition, the public comment letters received on the Project are attached as *Appendix A-3: NOP Written Comments* and *Appendix A-4: Public Scoping Meeting Comments*.

0. EXECUTIVE SUMMARY

C. ALTERNATIVES TO REDUCE OR AVOID SIGNIFICANT EFFECTS

The Los Angeles Department of City Planning and CEQA Guidelines Section 15126.6 require that an EIR describe a range of reasonable alternatives, including a "No Project" alternative that may potentially attain most of the basic Project objectives and could possibly avoid or substantially lessen any of the significant environmental effects of the Project. The CEQA Guidelines state that only those alternatives necessary to permit a "reasoned choice" are required. Based on the analysis of alternatives, an environmentally superior option must be designated. A complete analysis of Project alternatives, including an explanation of alternatives considered but not evaluated, is provided in *Section V: Alternatives* of this Draft SEIR and is summarized below.

Three alternatives, in addition to the Project, were evaluated, and an Environmentally Superior Alternative was identified. These alternatives are summarized as follows:

Alternative A: No Project (Existing Entitlement-Approved Master Plan) Alternative. The "No Project" Alternative typically assumes that no changes to a project site or existing structures would occur. For this Draft SEIR, a modified No Project Alternative is considered. The No Project Alternative assumes that the entire 700,000 square feet of the Master Plan would be developed, but that no additional medical center uses beyond the 700,000 square feet evaluated in the Original EIR, would occur.

Under the modified No Project Alternative, the Existing Building would not be demolished and up to 170,650 square feet of remaining entitled uses would be constructed on a building footprint limited to the Existing Parking Lot located at the Project Site or implemented as infill development throughout the CSMC Campus. On the Project Site, the new construction scale and design would be essentially equivalent to that described for the Approved Building and Approved Parking Structure (on Site 2) in the Original EIR for the Master Plan. Under the No Project Alternative, the resultant physical and operational conditions described in the approved Master Plan are anticipated. This Alternative satisfies a direct requirement in CEQA for a "No Project" alternative comparison.

Implementation of the No Project Alternative would not result in new environmental impacts beyond those identified in the Original EIR. Overall, the No Project Alternative would result in a reduced level of impact when compared to the Project due to the decreased level (approximately 40% reduction) of build-out and intensity of uses.

Alternative B: Reduced Project (Net Increase of 150,000 square feet) Alternative. The "Reduced Project" Alternative would consist of build-out of the 700,000 square feet approved and vested under the Master Plan and an additional 150,000 square feet (or the equivalent to 75 inpatient beds) of new floor area for medical center uses. The Reduced Project Alternative represents a 25% reduction of the proposed "net" Project, with no reduction in the approved Master Plan. Under the Reduced Project Alternative, the Existing Building would be demolished and the Project Site would be redeveloped with approximately 410,650 square feet of medical

center uses (90,000 square feet from the Existing Building, 170,650 square feet of development rights remaining under the Master Plan, and 150,000 square feet of new development rights) in a 10-story building. The associated parking structure to be developed on the Project Site would reflect a reduction in the parking requirement of approximately 75 spaces; however, it is assumed that the overall scale and configuration of the proposed seven-level parking structure would not change substantially, although the footprint may be slightly reduced.

The Reduced Project Alternative would require entitlements similar to those requested for the Project, except that the overall increases in intensity would be reduced proportionately. Specifically, the Zone and Height District Changes, and the Development Agreement and Master Plan amendment would be limited to the addition of 150,000 square feet of floor area (or 75 inpatient beds) and for a maximum FAR of 2.65:1.

This Alternative would allow implementation of the Master Plan and has the potential to accomplish many of the Project objectives by increasing the medical center intensity at the Project Site. The Reduced Project Alternative has the potential to result in reduced impacts for impacts related to construction (i.e., air quality and noise) and long-term traffic. However, it would result in similar or reduced environmental impacts for most issue areas compared to the Project (including those that would already be less than significant). Moreover, the Reduced Project Alternative would not satisfy one of the objectives of the Project to provide an additional 100 inpatient beds in the Southern California region, and may not satisfy several objectives to the extent desired due to the reduction in inpatient and building space, including the provision to support improved medical technologies and to provide needed inpatient diagnostic and treatment facilities.

Alternative C: Change in Use (Outpatient) Alternative. The "Change In Use" Alternative would consist of build-out of the Master Plan plus build-out of an additional 200,000 square feet of floor area of new medical center uses dedicated for outpatient services. The Change in Use Alternative would entail the addition of outpatient uses with no substantial change in the uses already entitled by the approved Master Plan. The 200,000 square feet of outpatient services would replace the 200,000 square feet for 100 inpatient beds and ancillary services requested by the Project; however, up to 200 inpatient beds may still be incorporated on the CSMC Campus per the previous entitlement. Under the Change in Use Alternative, the 90,000 square-foot Existing Building would be demolished and the Project Site would be redeveloped with approximately 460,650 square feet of medical center uses and a seven-level (or more) parking structure. The exterior building massing and design for the Change in Use Alternative is assumed to be essentially identical to that for the Project, although minor modifications may be necessary to address appropriate access and security for the outpatient services.

The Change in Use Alternative would require entitlements that are similar to those requested for the Project, except that the increases in intensity would be tied specifically to square footage increases for the purpose of outpatient services. Specifically, the Zone and Height District Changes, and the Development Agreement and Master Plan amendment, would be for the addition of 200,000 square feet of floor area for outpatient services and would allow a maximum FAR of 2.71:1.

The Change in Use Alternative would allow full implementation of the Master Plan and has the potential to accomplish many of the Project objectives by increasing the medical center intensity at the Project Site. Further, it has the potential to reduce impacts resulting from the change in use to outpatient services, possibly for operational impacts (i.e., noise) and aesthetic impacts (i.e., nighttime illumination). However, it was discovered that implementation of the Change in Use Alternative would result in increased impacts for long-term traffic and the related operational air quality impacts. Moreover, the Change In Use Project Alternative would not satisfy one of the objectives of the Project to provide an additional 100 inpatient beds in the Southern California region, but would satisfy a different need for outpatient services in the community.

Environmentally Superior Alternative. The impacts of the three selected alternatives are evaluated in comparison to the impacts of the Project in *Section V: Alternatives*. As required by CEQA, an environmentally superior alternative has been identified. The environmentally superior alternative is the one which results in substantially reduced impacts to either all environmental issue areas or within one or several key environmental issue areas.

Of the alternatives analyzed in this Draft SEIR (*Section V: Alternatives*), the No Project Alternative is considered the overall environmentally superior alternative as it would reduce (or avoid) the vast majority of the significant or potentially significant impacts that are anticipated to occur under the Project. However, the No Project Alternative would not substantially satisfy the objectives of the Project.

Aside from the No Project Alternative, the Reduced Project (150K) Alternative would also be considered an Environmentally Superior Alternative since it would reduce more of the Project impacts than any other of the remaining alternatives. Impacts that would be reduced include minor reductions to construction related impacts associated with air quality and noise and long-term operational impacts associated with traffic. However, the Project objective to provide 100 inpatient beds in the region would not be fulfilled under this Alternative and Project objectives to support improved medical technologies and to provide needed inpatient diagnostic and treatment facilities may not be fulfilled to the extent desired due to the reduction in inpatient and building space.

0. EXECUTIVE SUMMARY

D. SUMMARY OF PROJECT IMPACTS

Section IV: Environmental Analysis of this Draft SEIR includes a detailed analysis of the following environmental topics: Aesthetics/Visual Resources, Air Quality, Noise, Transportation and Circulation, and Cumulative Effects. A summary of the impacts addressed, and identification of the recommended mitigation measures, is presented below.

As discussed in *Section II: Project Description* of this Draft SEIR, in 1993, the City of Los Angeles approved the addition of 700,000 square feet (i.e., the Master Plan) of additional floor area for medical uses, with associated parking, at the CSMC Campus. In conjunction with that approval, the Original EIR was prepared and certified as a Project EIR. A full summary of the Original EIR impacts and mitigation measures is included as *Appendix B: 1993 CSMC Master Plan EIR Summary Chart* to this Draft SEIR. The Original EIR, which is fully incorporated herein, addressed the entire 700,000 square-foot Master Plan development, including the 170,650 square feet of vested development rights that remain unbuilt under the Master Plan. The Original EIR formed the basis of the "baseline" used during the Initial Study review for this current Project to characterize the "net" impact for the additional 100 inpatient beds and ancillary services (i.e., equivalent to 200,000 square feet of floor area for medical uses) and related parking comprising the Project.

The Original EIR concluded that development of the Master Plan would result in significant adverse and unavoidable impacts for the following environmental issues: geologic (seismic) hazards, air quality, fire protection, police protection, water supply, sewer system capacity, solid waste disposal, hazardous materials generation, and traffic. The Original EIR was certified, and the Master Plan adopted, along with Findings and a Statement of Overriding Considerations, which acknowledged these significant impacts. All other environmental issues were found to be less than significant with the incorporation of the mitigation measures that were adopted with approval of the Master Plan.

Consistent with CEQA, the analyses 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.

1. AESTHETICS

The aesthetic characteristics due to implementation of the Project are detailed in *Section IV.A: Aesthetics* of this Draft SEIR and summarized below.

Visual Quality and Character. The visual character of the area is that of a high density urban center having a high concentration of medical center and commercial uses and surrounded by lower intensity residential neighborhoods. Implementation of the Project would result in the replacement of the 2-story Existing Building and the adjacent surface parking lot with an 11-story, modern-style medical tower. The West Tower would be similar in size and mass to the existing North and South Towers on the CSMC Campus. The new development would help

unify the visual character of the CSMC Campus and would be consistent with the existing style and image of the area. Because the Project is complementary to the existing and intended visual character of the CSMC Campus, and the Project's architectural design is compatible with development in the surrounding area, the Project's impact to the area's aesthetic value and image would be less than significant.

During construction activities for the Project, the visual character of the Project Site will reflect short-term changes as some of the construction activities will be visible from adjacent land uses. As the majority of the demolition and construction will be located internal to the CSMC Campus, much of the construction activities will be screened by existing structures on-site. Although construction-related structures and activities would create a notable change to the visual character, these changes would extend only for the duration of the construction activities (approximately 36 months). Following the completion of construction, the CSMC Campus would resume a visual character similar to what currently exists.

Views. Implementation of the Project would increase visibility of development at the Project Site. The proposed West Tower would increase the building footprint and massing beyond the Approved Building under the Master Plan by incorporating one additional story (for a total of 11 stories) and replacing the Existing Building at the Project Site with a parking structure (up to 4 levels above grade). However, visibility of the West Tower from surrounding areas would be limited due to obstruction of views from the surrounding existing development. The height and massing of the Project would be consistent with the adjacent CSMC Campus North and South Towers, would incorporate many of the architectural elements of the existing CSMC Campus structures, and would appear as a continuation of existing background features. Overall views from surrounding areas would not be significantly impacted due to the existing development surrounding the Project Site, which already obscures or limits views to and from the Project Site. Although the immediate views of the Project Site would be of the intensified development, the West Tower would be visually consistent with the surrounding CSMC structures. Therefore, no significant impacts to existing viewsheds are expected.

Light, Glare and Nighttime Illumination. The Project would provide additional sources of nighttime illumination with security lighting, parking structure lighting, and interior building lighting. Night lighting from the West Tower would be visible at adjacent CSMC Campus structures and from commercial development along Beverly Boulevard. Lighting from the Project would not significantly impact commercial development on Beverly Boulevard as the street is already brightly lit at night. Lighting of the upper building levels may be visible to residences on Bonner Drive and residential areas outside of the immediate surrounding area that may have views toward the "Beverly Center-Cedars Sinai Regional Commercial Center."[3] Due to the existing developed nature of the Project Site and the CSMC Campus, as well as other existing commercial development in the area, the Project will not substantially change new

[3] According to the Wilshire Community Plan, the Beverly Center-Cedars Sinai Regional Commercial Center is an approximately 60-acre area centered around Alden Drive [now Gracie Allen Drive] and San Vicente Boulevard, generally bounded by Beverly Boulevard (north), 3rd Street (south), La Cienega Boulevard (east), and Robertson Boulevard (west). The area is primarily improved with high-rise medical and office buildings, hotels, apartment towers, entertainment centers, and regional shopping complexes.

sources of lighting and glare from existing conditions. No significant adverse illumination impacts are expected to occur.

The West Tower façade will be treated with a combination of stone and glass. Compliance with the LAMC Section 93.0117 (reflective materials design standards), which limit reflective surface areas and the reflectivity of architectural materials used, would reduce any adverse impact for building material glare. Implementation of the Project would not produce glare that would create a visual nuisance and, therefore, would not result in a significant impact.

Consistency with Adopted Plans and Policies. The Project is consistent with the Community Plan and has long been recognized by the community as an established use in this area. The Project directly contributes to the furtherance of the Urban Design policies and guideline identified in the Community Plan (i.e., through physical site improvements) and indirectly supports those policies by not creating obstacles for their realization (i.e., such as gateway identification for the Beverly Center-Cedars Sinai Regional Commercial Center area). The Project implements many of the site planning, building height, pedestrian-orientation, parking structure design, lighting and landscaping guidelines identified in the Urban Design section of the Community Plan. The Project would result in a less than significant impact to aesthetic-related and urban design consistency and compatibility issues in the Project area as demonstrated by the Project's consistency with applicable policies and programs of the Community Plan.

Cumulative Impacts. Development of the Related Projects would incrementally increase the intensity and urbanization of the Project area. As required by the City of Los Angeles, City of Beverly Hills and City of West Hollywood, the project design must be reviewed by the Los Angeles City Department of Planning for consistency with applicable City codes and regulations prior to final plan approval.

Comparison to Original EIR. The Original EIR concluded that the Master Plan would have an adverse impact by moderately increasing the visibility of the CSMC Campus relative to the surrounding area due to the increased density of development and increased visual prominence. The net incremental impact of the Project would be insignificant and the overall impact is similar to that already addressed in the Original EIR. The Original EIR concluded that impacts to short-range views/viewsheds was less than significant because existing adjacent structures already block views, and moderately adverse relative to longer-range views from more distant vantage points because of the overall increased visual prominence. Similarly, the impact of nighttime lighting and glare was less than significant against the existing ambient conditions. The net incremental impact of the Project relative to aesthetic issues, including visual character, views, lighting and glare, would be insignificant and the overall impact is similar to that already addressed in the Original EIR.

Also, the 1993 Development Agreement (Section 3.2.g) required that CSMC contribute up to $40,000 towards an Urban Design Program for the area generally bounded by Robertson Boulevard, Beverly Boulevard, Third Street, and San Vicente Boulevard. The purpose of the Urban Design Program is to create a more pedestrian-oriented environment in the area and provide a program of unifying themes and implementation program. Compared to the Master Plan project, the net change in Project conditions that might affect consistency is negligible.

Further, as concluded in the analysis above, implementation of the Project would result in an insignificant impact because it complies with applicable urban design guidelines.

Mitigation Program and Net Impact. Implementation of the standard conditions of approval, project design features, and previously adopted mitigation measures (listed below) would reduce all aesthetic impacts to less than significant levels. No additional mitigation measures are introduced in this SEIR as impacts related to aesthetics are already reduced to less than significant levels.

MM AES-1: As required by LAMC Section 12.40, the site will be required to prepare a Landscape Plan which will address replacement of removed trees.

MM AES-2: The owners shall maintain the subject property clean and free of debris and rubbish and to promptly remove any graffiti from the walls, pursuant to LAMC Section 91.8104.

MM AES-3: The Project is subject to the City of Los Angles Zoning Code, Lighting Regulations, Chapter 9, Article 3, Section 93.0117, which limits reflective surface areas and the reflectivity of architectural materials used.

MM AES-4: Outdoor lighting shall be designed and installed with shielding, so that the light source cannot be seen from adjacent residential properties.

MM AES-5: All open areas not used for the building, driveways, walls, or similar features shall be attractively landscaped in accordance with a landscape plan prepared by a licensed landscape architect and approved by the appropriate agencies. All landscaped areas shall be maintained in a first class condition at all times.

MM AES-6: The landscaped area along the property borders shall include trees spaced a minimum of 15 feet apart, measured from the center of each tree. Trees should be no less than 24-inch-boxes in size.

MM AES-7: Rooftop structures should be screened from view and utilities should be installed underground, where feasible.

MM AES-8: The project should avoid the inclusion of large, blank walls.

MM AES-9: Connection between the parking structures and the medical facilities should be physically integrated to provide a non-hazardous and aesthetically pleasing pedestrian entry into the main building.

MM AES-10: After obtaining project permit approval, the Applicant shall submit final site plans and elevations to the Department of City Planning prior to the issuance of a Building Permit. The Department of City Planning shall compare the final plans with those approved by the City Planning Commission. If the Department of City Planning determines that the final site plans or elevations

contain substantial changes, the applicant shall submit the final plans to the City Planning Commission for review and approval.

MM AES-11: All lighting shall be designed and placed in accordance with applicable Bureau of Engineering and Department of Public Works requirements.

MM AES-12: Provision shall be made to include exterior parking structure walls to shield direct glare from automobile headlights into residential areas.

MM AES-13: All outdoor lighting, other than signs, should be limited to that required for safety, securing, highlighting, and landscaping.

MM AES-14: Low level security lighting should be used in outdoor areas.

MM AES-15: Security lighting, as well as both outdoor lighting and indoor parking structure lighting, should be shielded such that the light source will not be visible from off-site locations.

MM AES-16: Lighting should be directed on site and light sources shall be shielded so as to minimize visibility from surrounding properties.

MM AES-17: Exterior windows should be tinted or contain an interior light-reflective film to reduce visible illumination levels from the building.

MM AES-18: Per the 1993 Development Agreement (Section 3.2.g), CSMC must contribute up to $40,000 towards an Urban Design Program for the area generally bounded by Robertson Boulevard, Beverly Boulevard, Third Street, and San Vicente Boulevard. The purpose of the Urban Design Program is to create a more pedestrian-oriented environment in the area and provide a program of unifying themes and implementation program.

2. AIR QUALITY

The emissions associated with the construction and operational phases of the Project, and cumulative future emissions, are detailed in *Section IV: Environmental Impact Analysis: B-Air Quality* of this Draft SEIR and summarized below.

Construction Activity. Construction of the Project will create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. Fugitive dust emissions would primarily result from demolition and site preparation (e.g., excavation) activities. Nitrogen oxide (NO_x) emissions would primarily result from the use of construction equipment. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release volatile organic compounds (VOCs). Demolition activities have the potential to release asbestos-containing materials ("ACMs") and lead-based paint.

Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Construction of the Project would result in maximum mitigated daily regional emissions of approximately 71 pounds per day ("ppd") of VOCs, 206 ppd of NO_X, 154 ppd of carbon monoxide (CO), less than 1 ppd of sulfur oxides (SO_X), 29 ppd of particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), and 91 ppd of particulate matter ten microns or less in diameter (PM_{10}).

Daily NO_X, PM_{10} and $PM_{2.5}$ emissions from construction are anticipated to be greater than the South Coast Air Quality Management District's (the "SCAQMD") regional significance thresholds and, as such, would result in a significant and unavoidable impact. The regional construction analysis assumed the Project would comply with SCAQMD Rule 403 for fugitive dust control. It is mandatory for all construction projects in the South Coast Air Basin to comply with SCAQMD Rule 403 for fugitive dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce regional PM_{10} and $PM_{2.5}$ emissions associated with construction activities by approximately 61 percent. The SCAQMD significance thresholds for VOC, CO, SO_X, would not be exceeded and regional construction emissions for these pollutants would not result in a significant impact.

Implementation of standard conditions and regulatory requirements, previously adopted mitigation measures, and additional recommended mitigation measures (listed below) would ensure proper implementation of Rule 403 and reduce NO_X and VOC emissions during construction. However, even as mitigated, Project NO_X, PM_{10} and $PM_{2.5}$ emissions would exceed the SCAQMD regional significance threshold and construction activity would result in a significant and unavoidable impact. Implementation of mitigation measure would reduce toxic air contaminants ("TAC") impacts associated with construction activities to less-than-significant levels.

Long-Term Operation. Long-term Project emissions would be generated by area sources, such as natural gas combustion and consumer products (e.g., aerosol sprays) and mobile sources. Motor vehicle trips generated by the Project would be the predominate source of long-term Project emissions. Mobile and area source emissions were estimated using URBEMIS2007.

Operation of the Project would result in total daily emissions of approximately 35 ppd of VOC, 52 ppd of NO_X, 436 ppd of CO, less than one ppd of SO_X, 27 ppd of $PM_{2.5}$, and 137 ppd of PM_{10}. Daily operational emissions are anticipated to be less than the SCAQMD regional significance thresholds and, as such, would result in a less-than-significant impact.

Emissions for the localized air quality analysis of CO were also assessed by using Localized Significance Thresholds ("LST") methodology promulgated by the SCAQMD.[4] One-hour CO concentrations due to Project conditions would be approximately 2 parts per million (ppm) at worst-case sidewalk receptors. Eight-hour CO concentrations due to the Project would range from approximately 1.2 ppm to 1.7 ppm. The State of California one- and eight-hour standards of 20 ppm and 9.0 ppm, respectively, would not be exceeded. Thus, a less-than-significant impact is anticipated.

The Project would not expose sensitive receptors to significant emissions of TAC as a result of activities associated with Project operations and impacts associated with TAC emissions during operations would be less than significant. The Project would not expose people to objectionable odors.

Consistency with Adopted Plans and Policies. The SCAQMD's 2007 Air Quality Management Plan ("AQMP") establishes goals and policies to reduce long-term emissions in the South Coast Air Basin. A project is consistent with the AQMP if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. The Project would not include new housing and is consistent with growth assumptions included in the AQMP. The Project would be consistent with the AQMP Consistency Criteria No. 1 and No. 2, and, therefore, a less-than-significant impact is anticipated.

Climate Change Gas Emissions. Global climate change, which refers to historical variance in the Earth's meteorological conditions and has received substantial public attention for more than 15 years, has recently been addressed through passage of Assembly Bill 32[5] (AB 32) resulting in the state-wide regulation of greenhouse gas (GHG) emissions. Some GHGs are emitted naturally (water vapor, carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O)), while others are exclusively human-made (e.g., gases used for aerosols and emissions from fossil fuel combustion).

GHG emissions would result from the combustion of fossil fuels to provide energy (electricity and natural gas sources) for the Project. Further, the provision of potable water used by the Project, which requires large amounts of energy associated with source and conveyance, treatment, distribution, end use, and wastewater treatment, contributes toward GHG emissions.[6] Also, GHG emissions from mobile sources are a function of vehicle miles traveled ("VMT").

The Project would result in net carbon equivalent emissions of 5,986 tons per year of CO_2, 6 tons per year of CH_4, and 36 tons per year of NO_2. Because the Project is typical urban infill development, would not generate a disproportionate amount of vehicle miles traveled, and would not have unusually high fuel consumption characteristics, it would have a negligible effect on any increase in regional and national greenhouse gas emissions.

[4] The concentrations of SO_2 are not estimated because construction activities would generate a small amount of SO_X emissions. No State standard exists for VOC. As such, concentrations for VOC were not estimated.
[5] AB 32 refers to the Global Warming Solutions Act of 2006 which was introduced during the 2006 California Legislative Session.
[6] Construction-related water usage would be de minimis when compared to overall water usage and was not factored into the analysis.

Cumulative Impacts. Based on SCAQMD's methodology, a project would have a significant cumulative air quality impact if the ratio of daily Project-related employment VMT to daily countywide VMT exceeds the ratio of Project-related employment to countywide employment. The proposed Project to countywide VMT ratio of 0.000048 is not greater than the proposed Project to countywide employment ratio of 0.000111. As such, the proposed Project would not significantly contribute to cumulative emissions and would have a less than significant impact.

Comparison to Original EIR. Compared to the Original EIR, which concluded that the Master Plan would have an adverse impact by mobile (construction and traffic-related) impact and a less than significant stationary impact, the net incremental impact of the Project would be insignificant and the overall impact is similar to that already addressed in the Original EIR. The Original EIR concluded that mobile-source impacts related to implementation of the Master Plan would be significant and unavoidable, even with implementation of the adopted mitigation measures.

Compared to the Original EIR, which concluded that the Master Plan would have a significant adverse impact related to TACs, even with compliance to federal, state and local regulations, the net incremental impact of the Project would be insignificant and the overall impact is similar to that already addressed in the Original EIR. Overall the Master Plan impacts remain significant.

Mitigation Program and Net Impact. Implementation of the standard conditions of approval, project design features, previously adopted mitigation measures, and additional recommended mitigation measures would reduce all air quality impacts due to the Project, except for those during the construction phase, to less than significant levels.

MM AQ-1: The Project will comply with applicable California Air Resources Board ("CARB") regulations and standards. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county levels.

MM AQ-2: The Project will comply with applicable SCAQMD regulations and standards. The SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards in the District. Programs that were developed include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

MM AQ-3: The Project will be designed to reduce exposure of sensitive receptors to excessive levels of degraded air quality. Also, the Project will incorporate many "sustainable" or "green" strategies that target sustainable site development, water

savings, energy efficiency, green-oriented materials selection, and improved indoor environmental quality, which in turn serve to directly and proactively reduce GHG and other air pollutant emissions. Project Design Features to be incorporated by the Project shall include, but are not limited to, the following or their equivalent:

- The CSMC Campus, including the Project Site, is conveniently located with respect to public transit opportunities. Given the Project Site's location within an established urban area, access to a number of existing Los Angeles Metro bus lines is available, and a potential Metro Rail station at the northeast corner of the CSMC Campus may be available in the future, thereby reducing traffic, air quality, noise, and energy effects.

- 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.

- The West Tower design incorporates light-colored roofing and paving materials which serve to reduce unwanted heat absorption and minimize energy consumption.

- Building materials and new equipment associated with the West Tower are selected to avoid materials that might incorporate atmosphere-damaging chemicals.

- The West Tower energy performance is designed to be 14% more effective than required by California Title 24 Energy Design Standards, thereby reducing energy use, air pollutant emissions and greenhouse gas emissions.

- The West Tower will generate 2.5% of the building's total energy use through on-site renewable energy sources. On-site renewable energy sources can include a combination of photovoltaic, wind, hydro, wave, tidal and bio-fuel based electrical production systems, as well as solar thermal and geothermal energy systems.

- The West Tower will use materials with recycled content such that the sum of post-consumer content plus one-half of the pre-consumer content constitutes at least 10% (based on cost) of the total value of the materials in the Project.

- Lighting systems within the West Tower will be controllable to achieve maximum efficiency (e.g., uniform general ambient lighting, augmented with individually controlled task lighting that accommodates user-adjustable lighting levels and automatic shutoff switching).

- The West Tower will be designed to provide occupant thermal comfort dissatisfaction levels above 85%.

MM AQ-4: Haul trucks shall be staged in non-residential areas and called to the site by a radio dispatcher. A Haul Route Permit shall be required before haul truck operations are conducted.

MM AQ-5: Diesel-powered equipment shall be located as far as possible from sensitive receptors.

MM AQ-6: A temporary wall of sufficient height to reduce windblown dust shall be erected on the perimeter of the construction site.

MM AQ-7: Ground wetting shall be required during grading and construction, pursuant to SCAQMD Rule 403. This measure can reduce windblown dust a maximum of 50 percent.

MM AQ-8: Contractors shall cover stockpiles of soil, sand, and similar materials to reduce wind pick-up.

MM AQ-9: Construction equipment shall be shut off to reduce idling for extended periods of time when not in use.

MM AQ-10: Low sulfur fuel should be used to power construction equipment.

MM AQ-11: Construction activities shall be discontinued during second stage smog alerts.

MM AQ-12: The proposed project shall implement a Transportation Demand Management program consistent with the provisions of SCAQMD Regulation XV.

MM AQ-13: The Medical Center should reduce, to the extent possible, its reliance on hazardous materials.

MM AQ-14: The Medical Center should analyze the effect of stack design and exhaust velocity on the dispersion of air toxics.

MM AQ-15: New exhaust systems should be designed to place vents at or above the roof level of nearby buildings.

MM AQ-16: Conservation with the Los Angeles Department of Water and Power and [The Gas Company] to determine feasible energy conservation features that could be incorporated into the design of the proposed project.

MM AQ-17: Compliance with Title 24, established by the California Energy Commission regarding energy conservation standards. Those standards relate to insulation requirements and the use of caulking, double-glazed windows, and weather stripping.

MM AQ-18: Thermal insulation which meets or exceeds standards established by the State of California and the Department of Building and Safety should be installed in walls and ceilings.

MM AQ-19: Tinted or solar reflected glass would be used on appropriate exposures.

MM AQ-20: Heat-reflecting glass on the exterior-facing, most solar-exposed sides of the building, should be used to reduce cooling loads.

MM AQ-21: Interior and exterior fluorescent [halogen, or other energy efficient type] lighting should be used in place of less efficient incandescent lighting.

MM AQ-22: A variable air volume system which reduces energy consumption for air cooling and heating for water heating should be used where permitted.

MM AQ-23: Air conditioning which will have a 100 percent outdoor air economizer cycle to obtain free cooling during dry outdoor climatic periods should be used.

MM AQ-24: Lighting switches should be equipped with multi-switch provisions for control by occupants and building personnel to permit optimum energy use.

MM AQ-25: Public area lighting, both interior and exterior, should be used, time controlled, and limited to that necessary for safety.

MM AQ-26: Department of Water and Power recommendations on the energy efficiency ratios of all air conditioning equipment installed should be followed.

MM AQ-27: A carefully established and closely monitored construction schedule should be used to coordinate construction equipment movements, thus minimizing the total number of pieces of equipment and their daily movements. This would reduce fuel consumption to a minimum.

MM AQ-28: Water or a stabilizing agent shall be applied to exposed surfaces in sufficient quantity to prevent generation of dust plumes.

MM AQ-29: Track-out shall not extend 25 feet or more from an active operation, and track-out shall be removed at the conclusion of each workday.

MM AQ-30: A wheel washing system shall be installed and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site.

MM AQ-31: All haul trucks hauling soil, sand, and other loose materials shall maintain at least six inches of freeboard in accordance with California Vehicle Code Section 23114.

MM AQ-32: All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).

MM AQ-33: Traffic speeds on unpaved roads shall be limited to 15 miles per hour.

MM AQ-34: Operations on unpaved surfaces shall be suspended when winds exceed 25 miles per hour.

MM AQ-35: Heavy equipment operations shall be suspended during first and second stage smog alerts.

MM AQ-36: On-site stockpiles of debris, dirt, or rusty materials shall be covered or watered at least twice per day.

MM AQ-37: Contractors shall utilize electricity from power poles rather than temporary diesel or gasoline generators, as feasible.

MM AQ-38: Architectural coating shall have a low VOC content, per SCAQMD guidance.

MM AQ-39: Prior to issuance of demolition permits, an asbestos and lead-based paint survey shall be conducted. If ACMs are detected, these materials shall be removed by a licensed abatement contractor and in accordance with all applicable federal, State, and local regulations, including SCAQMD Rule 1403 prior to demolition. If lead-based paint is identified, federal and State construction worker health and safety regulations (including applicable California Division of Occupational Safety and Health ("Cal/OSHA") and United States Environmental Protection Agency ("USEPA") regulations) shall be followed during demolition activities. Lead-based paint shall be removed by a qualified lead abatement contractor and disposed of in accordance with existing hazardous waste regulations. If lead-based paint is identified on the building structure to be demolished, near-surface soil samples shall be collected around the structure to determine the potential for residual soil lead contamination, and appropriate remediation shall be completed prior to building construction.

The Project will result in net significant unavoidable construction (short-term) air quality impacts related to NO_x, PM_{10} and $PM_{2.5}$. Pursuant to CEQA Guidelines Sections 15092 and 15093, and in the event the Project is approved, the City of Los Angeles must adopt a Statement of Overriding Considerations acknowledging these outstanding significant adverse impacts and stating the reason(s) for accepting these impacts in light of the whole environmental record as weighed against the benefits of the Project.

3. NOISE

The noise levels associated with the construction and operational phases of the Project, and cumulative future noise levels, are detailed in *Section IV.C: Noise* of this Draft SEIR and summarized below.

Construction (Short-Term) Noise. Construction of the Project would result in temporary increases in ambient noise levels in the Project area on an intermittent basis. The highest noise levels are expected to occur during the grading/excavation and finishing phases of construction. These noisiest phases occur for approximately one to two months each. Construction activity would comply with the guidelines set forth in the Noise Ordinance of the Los Angeles Municipal Code. Construction noise and ground-borne vibration may, however, result in annoyance to nearby sensitive receptors. Implementation of the mitigation program would reduce construction noise and ground-borne vibration and provide a way for Project-related community noise complaints to be addressed. Construction-related noise would exceed the five-dBA (decibels) significance threshold at various sensitive receptors even with implementation of mitigation measures and, as such, the Project would result in a significant and unavoidable construction (short-term) noise impact.

Operational (Long-Term) Noise. The predominant operational noise source for the Project is vehicular traffic. The greatest Project-related mobile noise increase would be 1.1 dBA Community Noise Equivalent Level ("CNEL") and would occur along Alden Drive-Gracie Allen Drive, between Robertson Boulevard and George Burns Road. The roadway noise increase attributed to the Project would be less than the 3-dBA CNEL significance threshold at all analyzed segments. As such, there would not be a perceptible change in audible noise as a result of increased traffic.

Potential stationary noise sources related to the long-term operations of the Project include mechanical equipment (e.g., parking structure air vents and heating, ventilation, and air conditioning ("HVAC") equipment.) Mechanical equipment would be designed so as to be within an enclosure or confined to the rooftop of the West Tower. In addition, mechanical equipment would be screened from view as necessary to comply with the City of Los Angeles Noise Ordinance requirements for both daytime (50 dBA) and nighttime (40 dBA) noise levels at residential land uses. Non-vehicular noise generated by Project operation (e.g. mechanical equipment and parking activity) would not increase ambient noise levels by more than the 5-dBA significance threshold. As such, non-vehicular noise would result in a less-than-significant impact.

The Approved Parking Structure, which was approved as part of the Master Plan, will increase by 50 parking spaces under the proposed Project. Even with the addition of 50 parking spaces, activity within the Project parking structure would not incrementally increase ambient noise levels by 5 dBA or more; thus, noise associated with the parking facilities would result in a less than significant impact.

The Project will also incorporate a loading dock and ambulatory service area, which will be located in the parking structure and accessed primarily from Gracie Allen Drive. The loading dock and ambulatory service area would be internal to the parking structure. Thus these areas would be shielded from sensitive receptors by Project structures, which would act as noise barriers preventing an increase of ambient noise levels by more than 5 dBA at off-site sensitive receptors. The Project would result in a less than significant operational noise impact due to loading dock or service access operations.

Siren noise from emergency vehicles leaving from and arriving at the Project Site would constitute a short-term and intermittent noise source and result in a less than significant impact.

Vibration. Use of heavy equipment (e.g., a sonic pile driver) typically used during construction generates vibration. Operation of the Project would not include significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on the local roadways. However, similar to existing conditions, traffic-related vibration levels would not be perceptible by sensitive receptors. The Project would not include any significant sources of ground-borne vibration. The ground-borne vibration operational impact would be less than significant.

Consistency with Adopted Plans and Policies. The Noise Element of the Los Angeles General Plan indicates that interior operational noise for hospitals should be 45 dBA or lower. Typical construction of building walls provides a noise reduction of approximately 26 dBA. The Project would also be constructed with windows that cannot be opened. As such, interior noise levels would be at least 26 dBA less than exterior noise levels and would be less than the 45 dBA CNEL. Residential uses, which have lower ambient noise levels than the Project Site, would be less affected by Project-related noise since these residential uses are located farther away from the Project Site than the adjacent medical uses. Because the Project would be consistent with the Noise Element, impacts related to consistency with applicable noise-related plans and policies are less than significant.

Cumulative Impacts. The Project would result in less than significant operational (long-term) noise and vibration impacts and thus would not significantly contribute to cumulative operational noise or vibration impacts in the area. However, the construction (short-term) noise impacts resulting from the Project would be significant and unavoidable. With the addition of construction noise generated by the nearest Related Project, the increase in ambient noise levels would exceed the 5-dBA significance threshold and would result in significant cumulative construction (short-term) noise impacts as well.

Comparison to Original EIR. The Original EIR concluded that the Master Plan would have adverse construction (short-term) noise impacts due to demolition and construction activities, and less than significant operational (long-term) impacts with implementation of mitigation measures (from either mobile or stationary sources). The net incremental impact of the Project beyond the Master Plan would be considered less than significant and the overall impact is similar to that already addressed in the Original EIR.

Mitigation Program and Net Impact. Implementation of the standard conditions of approval, project design features, previously adopted mitigation measures, and additional recommended mitigation measures would reduce all noise impacts, except for construction phase impacts to adjacent sensitive receptors, to less than significant levels.

MM NOI-1: The Project will comply with the City's Noise Ordinance to ensure that construction activities are conducted in accordance with the LAMC

MM NOI-2: Specify the use of quieted equipment in compliance with the applicable provisions of the City of Los Angeles Noise Ordinance No. 156,363.

MM NOI-3: Route trucks hauling debris through non-residential areas by approval of the Department of Building and Safety.

MM NOI-4: The use of quieted equipment would reduce noise levels by an additional 3 to 6 dBA.

MM NOI-5: Limit demolition activities to the hours of 7:00 A.M. to 6:00 P.M., Monday through Friday and from 8:00 A.M. to 6:00 P.M. on Saturday.

MM NOI-6: Construct a temporary noise barrier wall along the property line, where feasible, as determined by the Department of Building and Safety.

MM NOI-7: Specify that all sound-reducing devices and restrictions be properly maintained throughout the construction period.

MM NOI-8: Where temporary noise barriers are infeasible, portable noise panels to contain noise from powered tools shall be used.

MM NOI-9: Use rubber-tired equipment rather than track equipment.

MM NOI-10: Limit the hours of construction to between 7:00 A.M. and 6:00 P.M., Monday through Friday and between 8:00 A.M. and 6:00 P.M. on Saturday.

MM NOI-11: Keep loading and staging areas on site within the perimeter protected by the recommended temporary noise barrier and away from the noise-sensitive sides of the site.

MM NOI-12: If feasible, use alternate pile placement methods other than impact pile driving (See MM NOI-22 for a detailed discussion of the feasibility of alternate pile placement methods).

MM NOI-13: Installation of sound attenuating devices on exhaust fans, enclosing mechanical equipment, and providing sound absorbing and shielding provisions into the design.

MM NOI-14: Construction contracts shall specify that all construction equipment be equipped with mufflers and other suitable noise attenuation devices.

MM NOI-15: Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).

MM NOI-16: Barriers such as plywood structures or flexible sound control curtains extending eight feet in height shall be erected around the perimeter of the Project Site to the extent feasible, to minimize the construction noise.

MM NOI-17: Flexible sound control curtains shall be placed around drilling apparatus and drill rigs used within the Project Site, to the extent feasible.

MM NOI-18: The construction contractor shall establish designated haul truck routes. The haul truck routes shall avoid noises sensitive receptors, including, but are not limited to residential uses and schools.

MM NOI-19: All residential units located within 500 feet of the construction site shall be sent a notice regarding the construction schedule of the Project. A sign, legible at a distance of 50 feet shall also be posted at the construction site. All notices and signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.

MM NOI-20: The construction contractor shall establish a "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and would be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.

MM NOI-21: The applicant shall conduct an acoustical analysis to confirm that the materials to be used for the proposed Project would reduce interior noise levels by to dBA. If the analysis determines that additional noise insulation features are required, the acoustical analysis shall identify the type of noise insulation features that would be required to reduce the interior noise levels by to dBA, and the applicant shall incorporate these features into the proposed Project.

MM NOI-22: Pile driving activity shall be limited based on the distance of vibration sensitive buildings to the Project Site. For buildings within 35 feet of pile driving activity, contractors shall use caisson drilling to drive piles. For buildings 35 to 55 feet from pile driving activity, contractors shall use sonic or vibratory pile drivers to drive piles. For buildings 55 feet and beyond pile driving activity, contractors may use impact pile drivers.

The Project will result in net significant unavoidable impacts related to construction (short-term) noise impacts at sensitive receptors. Pursuant to CEQA Guidelines Sections 15092 and 15093, and in the event the Project is approved, the City of Los Angeles must adopt a Statement of Overriding Considerations acknowledging these outstanding significant adverse impacts and

stating the reason(s) for accepting these impacts in light of the whole environmental record as weighed against the benefits of the Project.

4. TRANSPORTATION AND CIRCULATION

The traffic and parking effects associated with the construction and operational phases of the Project, and cumulative future traffic levels, are detailed in *Section IV.D: Transportation and Circulation* of this Draft SEIR and summarized below.

Construction Activity. During the construction phase, traffic would be generated by activities including construction equipment, crew vehicles, haul trucks and trucks delivering building materials. Hauling of debris would be restricted to a haul route approved by the City of Los Angeles. The City will approve specific haul routes for the transport of materials to and from the Project Site during demolition and construction.

It is assumed that heavy construction equipment would be located on-site during grading activities and would not travel to and from the Project Site on a daily basis. However, truck trips would be generated during the demolition, grading, and export period, so as to remove material (from demolition) from the Project Site. Trucks are expected to carry the export material to a receptor site located within 20 miles of the Project Site.

During the construction phase, local traffic may experience a temporary increase as additional construction-related trips (comprising commuting construction personnel and haul trucks) would be added to the area in addition to traffic generated by the existing uses. Ingress and egress from the Project Site would be designed pursuant to City code requirements. Nevertheless, it will be necessary to develop and implement a construction traffic control plan, including the designated haul route and staging area, traffic control procedures, emergency access provisions, and construction crew parking to mitigate the traffic impact during construction. The construction traffic control plan would also address interim traffic staging and parking for the CSMC Campus. Because a construction traffic and interim traffic control plan will be in force, and because the temporary increase and disruption to the local traffic area due to construction activity would be short-term and not permanent, the resulting impact to traffic would be less than significant with implementation of the traffic control plans and the City's approval of the haul routes.

Long-Term Operation. Traffic generation is expressed in vehicle trip ends, defined as one-way vehicular movements, either entering or exiting the generating land use. Traffic volumes expected to be generated by the Project were based upon rates per number of hospital beds. The proposed Project is expected to generate 113 net new vehicle trips (79 inbound trips and 34 outbound trips) during the A.M. peak hour. During the P.M. peak hour, the Project is expected to generate 130 net new vehicle trips (47 inbound trips and 83 outbound trips). Over a 24-hour period, the Project is forecasted to generate 1,181 net new daily trip ends during a typical weekday (approximately 592 inbound trips and 592 outbound trips).

With traffic generated from ambient growth and Related Projects taken into consideration, the proposed Project is anticipated to create significant impacts at the following two study intersections:

Int. No. 2: Robertson Blvd./Alden Dr.-Gracie Allen Dr. for A.M. and P.M. peak hours
Int. No. 6: George Burns Rd./Beverly Blvd. for P.M. peak hour

However, with implementation of mitigation measures, the impacts at the above two study intersections may be reduced to less than significant levels. It should be noted that Intersection No. 6 must be implemented with approval and cooperation from the City of West Hollywood. If the City of West Hollywood does not approve the implementation of the mitigation measures, the impacts at Intersection No. 6 would remain significant and unavoidable.

Parking. The proposed Project will modify the existing parking supply on the CSMC Campus through removal of 217 parking spaces in the Existing Parking Lot and development of the new 700-space adjoining parking structure to be constructed as part of the Project. No other modifications to the CSMC parking supply are planned as part of the Project. As such, the parking supply at the Project Site will increase by an approximate net change of 483 spaces.

Parking supply for the CSMC Campus will increase from an existing parking supply of 7,275 spaces (including 547 spaces to be provided as part of the Pavilion) to a total of 7,758 spaces. Based on the parking requirements for the planned development program, the future City parking requirement for the CSMC Campus will be 7,669 spaces. This is based on the existing City requirement of 6,706 spaces and the future Code requirement of 963 spaces for the planned development program (6,706 + 963 = 7,669 spaces). Therefore, the planned CSMC Campus parking supply of 7,758 spaces will exceed the City parking requirement of 7,669 spaces by a total of 89 spaces.

Loss of on-street parking spaces on Robertson Boulevard and Beverly Boulevard to implement traffic mitigation measures (i.e., intersection improvements) for the two impacted intersections noted above could have an adverse impact to businesses in the Project area which depend on this on-street parking.

Transit System. As required by the 2004 Congestion Management Program for Los Angeles County, a review has been made of the CMP transit service, which is currently provided in the Project vicinity. Pursuant to the CMP guidelines, the Project is forecast to generate demand for 6 transit trips (4 inbound and 2 outbound trips) during the weekday A.M. peak hour and 7 transit trips (3 inbound trips and 4 outbound trips) during the weekday P.M. peak hour. Over a 24-hour period, the Project is forecast to generate demand for 58 daily transit trips.

Therefore, with continuation of the 11 existing bus lines currently running in the Project area, peak hour transit trips would correspond to less than one additional Project-related transit rider per bus. Therefore, it is anticipated that the existing transit service in the Project area would adequately accommodate the Project-generated transit trips. Given the low number of generated transit trips per bus, less than significant impacts on existing or future transit services in the Project area are expected to occur as a result of the Project.

Pedestrian Environment. The pedestrian access and environment on the CSMC Campus includes a network of private internal streets, sidewalks, crosswalks, signage, ground-level entrance to all structures, public transit stops and elevated pedestrian bridge connections between most buildings.

All new buildings constructed on the CSMC Campus are to be designed to provide appropriate access and include those necessary street and sidewalk improvements to comply with all Building Code and Municipal Code regulations. The proposed Project will improve access at the Campus by allowing easy movement between facilities through a pedestrian bridge to the existing North Tower. The Project will not affect existing pedestrian access on the Campus and no mitigation is required as the Project will, in fact, improve pedestrian access to a beneficial level. The proposed Project is anticipated to be consistent with the pedestrian orientation policies, goals and objectives, as suggested in the Urban Design guidelines of the Wilshire Community Plan.

Consistency with Adopted Plans and Polices. The Project does not propose any change to adopted Plans or policies, nor reclassification of applicable designations. The Project is consistent with the transportation-related goals, objectives and policies because the Project will either directly contribute toward the furtherance of those policies (i.e., intersection improvements or off-street parking resources) or indirectly supports those policies through not creating obstacles for their realization (e.g., such as enhanced public transit and pedestrian orientation). Therefore, the Project will result in a less than significant impact to transportation in the Project area due to conflicts with policies and programs supporting public transit, alternative transportation modes, transportation systems, congestion management, and parking.

Cumulative Impacts. See Long-Term Operation above. The analysis of cumulative impacts was completed concurrent with the Project analysis (existing conditions plus ambient growth plus Related Projects development plus Project with mitigation measures).

Comparison to Original EIR. The Original EIR concluded that the Master Plan would have less than significant impacts with implementation of mitigations at all study intersections with the exception of Sherbourne Drive/Third Street, which resulted in a significant and unavoidable impact even with mitigations. The loss of on-street parking under the Master Plan was determined to be significant; however, with implementation of mitigation measures, off-street parking on the CSMC Campus resulted in no significant impacts. With implementation of all code requirements and mitigation measures, no significant impacts were anticipated on pedestrian or vehicular access either. The net incremental impact on traffic, parking, access and public transit resulting from the Project beyond the Master Plan would be considered less than significant and the overall impact is similar to that already addressed in the Original EIR.

Mitigation Program and Net Impact. Implementation of the standard conditions of approval, project design features, previously adopted mitigation measures, and additional recommended mitigation measures would reduce all transportation impacts, including construction traffic, to less than significant levels.

MM TRF-1: In accordance with Los Angeles Municipal Code Section 91.70067, hauling of construction materials shall be restricted to a haul route approved by the City. The City of Los Angels will approve specific haul routes for the transport of materials to and from the Project Site during demolition and construction.

MM TRF-2: The Applicant shall submit site plans to the Los Angeles Department of Transportation and the Bureau of Engineering for approval prior to the issuance of any foundation permit. The site plans shall include highway easements, access locations, and adjacent street improvements.

MM TRF-3: Applicant shall prepare and submit a Transportation Demand Management ("TDM") plan to LADOT which will contain measures to achieve a 19 percent reduction in overall P.M. peak hour trips for the entire Cedars-Sinai Medical Center. This plan shall be submitted to and must be approved by LADOT prior to the issuance of any building permits. The TDM Plan shall include, but not be limited to, the following features: transportation allowance, provision of preferential parking for carpools/vanpools, additional financial incentives, purchase of bicycles and related equipment for employees, increased employee participation in Compressed Work Week schedules, expanded employee benefits, visitor transit incentives, and a Guaranteed Ride Home program for ridesharers. Prior to the issuance of any building permit, the applicant shall execute and record a covenant to the satisfaction of DOT guaranteeing implementation of the DOT approved TDM Plan.

MM TRF-4: Driveway plans shall be prepared for approval by the appropriate District Office of the Bureau of Engineering and the Department of Transportation.

MM TRF-5: Access for the handicapped shall be located in accordance with the requirements of the Handicapped Access Division of the Department of Building and Safety.

MM TRF-6: Adequate access to site for police shall be provided. A diagram of the site shall be sent to the Police Department for their review, and their recommendations and requirements shall be incorporated into the final design.

MM TRF-7: Adequate access to site for fire protection service vehicles and personnel shall be provided. A diagram of the site shall be sent to the Fire Department for their review. Emergency access and exit plans shall comply with the recommendation and requirements of the Fire Department.

MM TRF-8: The applicant should provide safe pedestrian/auto junctures to the satisfaction of the Department of Transportation and the Bureau of Engineering at key intersections, driveway locations, entry points, and within parking areas of the Medical Center.

MM TRF-9: Sheltered waiting areas shall be provided by the applicant at bus stops adjacent to the perimeter of the Cedars-Sinai Medical Center campus where no shelter currently exists.

MM TRF-10: Applicant shall coordinate with DOT to identify sidewalks and pedestrian access points for improvement of access from transit stops.

MM TRF-11: Parking/driveway plan. A parking area and driveway plan shall be prepared for approval by the appropriate District Offices of the Bureau of Engineering and the Department of Transportation.

MM TRF-12: The design of the on-site parking shall integrate safety features, such as, signs, lights, and striping pursuant to Section 12.21.A5 of the Municipal Code.

MM TRF-13: The Driveway and Parking Plan review for the project should be coordinated with the Citywide Planning Coordination Section.

MM TRF-14: Off-street parking should be provided for all construction-related employees generated by the proposed Project. No employees or sub-contractors should be allowed to park on the surrounding residential streets for the duration of all construction activities.

MM TRF-15: Off-street parking shall be provided free of charge for all construction-related personnel and employees, including without limitation independent contractors, consultants and agents, during the construction phases of the project.

MM TRF-16: Coordinate temporary location for bus stops on Third Street and Alden Drive with SCRTD [now Metro] during project construction.

MM TRF-17: Maps of surrounding bus services should be posted at bus stops and other locations where people are likely to view the information, particularly near the Outpatient Diagnostic and Treatment Center [now referred to as the Advanced Health Sciences Pavilion], where over 75 percent of the daily new trips are assigned. Information shown should include the location of the closest bus stops, hours of operation, frequency of service, fares, and SCRTD [now Metro] telephone information numbers.

MM TRF-18: Sheltered waiting areas should be provided at major bus stops where no shelter currently exists.

MM TRF-19: The Medical Center shall coordinate with LADOT to identify sidewalks which should be widened within the campus to encourage pedestrian activity and improve access to transit stops.

MM TRF-20: Any planned retail sites such as pharmacies, newspaper stands, or food and beverage stands should be located adjacent to major bus stops in order to improve the convenience of using transit.

MM TRF-21: Coordinate relocation of underground utility lines in the event of encroachment upon same by construction related to proposed Project.

MM TRF-22: The Project Applicant will prepare and implement an Interim Traffic Control Plan ("TCP") during construction.

MM TRF-23: Prior to obtaining a demolition and/or grading permit, the Project Applicant shall prepare a Construction Traffic Control Plan ("Construction TCP") for review and approval by the LADOT. The Construction TCP shall include the designated haul route and staging area, traffic control procedures, emergency access provisions, and construction crew parking to mitigate the traffic impact during construction. The Construction TCP will identify a designated off-site parking lot at which construction workers will be required to park.

MM TRF-24: **Int. No. 2: Robertson Blvd./Alden Dr.-Gracie Allen Dr.** Provide a right-turn-only lane at the northbound approach of Robertson Boulevard at the Alden Drive-Gracie Allen Drive intersection, as well as a right-turn-only lane at the westbound approach of Alden Drive-Gracie Allen Drive at the intersection. The resultant lane configurations at the northbound approach to the intersection will be one exclusive left-turn lane, one through lane and one right-turn-only lane. The resultant lane configurations at the westbound approach to the intersection will be one shared left-turn/through lane and one right-turn-only lane. These improvement measures would require restriping both the northbound and southbound approaches to the intersection; widening the westbound approach along the north side of Alden Drive-Gracie Allen Drive by 2.5 feet for a distance of approximately 100 feet (not including the transition length back to the existing sidewalk width), thereby reducing sidewalk width from the existing 12.5 feet to 10 feet; as well as the removal of on-street parking along the eastside of Robertson Boulevard south of the intersection for a distance of approximately 130 feet (approximately 6 spaces). If implemented, the mitigation measure shall be executed in two phases. First, Alden Drive-Gracie Allen Drive shall be widened and restriped as proposed above. Second, a traffic warrant analysis shall be performed 2 years after full occupancy of the Project to determine the need for a right-turn-only lane at the northbound approach of Robertson Boulevard. If a right-turn-only lane is warranted, the lane shall be implemented as proposed above.

MM TRF-25: **Int. No. 6: George Burns Rd./Beverly Blvd.** Provide a right-turn-only lane at the eastbound approach of Beverly Boulevard at the George Burns Road intersection, as well as two lanes at the northbound approach of George Burns Road at the intersection. The resultant lane configurations at the eastbound approach to the intersection will be one two-way left-turn lane, two through lanes

and one right-turn-only lane. The resultant lane configurations at the northbound approach to the intersection will be one shared left-turn/through lane and one right-turn-only lane. These improvement measures would require widening along the south side of Beverly Boulevard west of the intersection by approximately three feet and the removal of on-street parking for a distance of approximately 55 feet to accommodate the installation of the eastbound right-turn-only lane (approximately 4 spaces). The three-foot widening would also reduce the existing sidewalk width from 15 feet to the minimum required 12 feet for a Major Highway Class II for a distance of approximately 100 feet (not including the transition length back to the existing sidewalk width). It must be noted that this intersection is located in the City of West Hollywood, therefore implementation of the recommended mitigation will require approval and cooperation with the City of West Hollywood.

5. CUMULATIVE EFFECTS

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. Thus, these Master Plan 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.

Mitigation Program and Net Impact. Implementation of standard conditions of approval and project design features would reduce net cumulative impacts from the Project and would prevent a significant incremental impact contribution to the already significant cumulative impacts determined in the Original EIR for the Master Plan.

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.

6. GROWTH INDUCING

Section 15126(d) of the CEQA Guidelines requires that an EIR discuss the growth inducing impact of a proposed project, including “ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." The California Department of Transportation (“Caltrans”) requires similar analysis for Projects located along state highways, including the proposed Project.

The proposed Project is not expected to generate growth in the area beyond the intensification of the Project Site. Development of the Project will result in an increase in short-term construction and long-term employment opportunities. However, it is not expected that any significant number of employees will move to the area specifically because of the Project. Further, no additional infrastructure would be constructed that could generate additional population growth in the Project area.

Surrounding land uses and businesses may experience secondary effects through stimulated economic activity and growth due to an increased need for commercial support services in the

general vicinity of the Project Site due to the incremental increase in the number of employees and patrons at the CSMC Campus. Although the proposed Project would directly provide employment growth at the Project Site, and indirectly stimulate economic growth in the surrounding area, such growth is not outside the scope of what has been anticipated and planned for in the Wilshire Community Plan area. Further, in conducting a "First-cut Screening" analysis of the Project, utilizing criteria set forth by Caltrans relating to accessibility, Project type, Project location, growth pressure, and geography, it has been determined that the Project is unlikely to cause direct or indirect growth-related impacts.[7] Therefore, no significant growth inducing impacts are anticipated.

[7] California Department of Transportation, *Guidance for Preparers of Growth-related, Indirect Impact Analyses*, May 2006.

0. EXECUTIVE SUMMARY

E. MITIGATION PROGRAM

A Mitigation Monitoring Program ("MMP") has been prepared in accordance with Public Resources Code Section 21081.6, which requires a Lead or Responsible Agency that approves or carries out a project where an EIR has identified significant environmental effects to adopt a "reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment." A Final MMP will be adopted at the conclusion of the SEIR process and will reflect the final set of required mitigation measures to address Project impacts. The MMP is described in *Section VI.E: Mitigation Monitoring Program* of this Draft SEIR, and a draft MMP is included in *Appendix G: Mitigation Monitoring Program*.

I. INTRODUCTION

A. ENVIRONMENTAL REVIEW PROCESS

1. OVERVIEW OF THE CEQA PROCESS

The California Environmental Quality Act (CEQA) (Public Resources Code, Sections 21000-21177) requires that all public agencies within the State of California, having land use approval over project activities that have the potential to affect the quality of the environment, shall regulate such activities so that impacts to the environment can be prevented to the extent feasible. Such activity is reviewed and monitored through the CEQA process, as provided in the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387). CEQA distinguishes varied levels of documentation and public review based on a project's anticipated level of effect on the environment.

When it is determined through preliminary review that a project may likely have one or more significant effects upon the environment, then an Environmental Impact Report ("EIR") must be prepared. The "scope" of the EIR may be determined through preparation of an Initial Study and a public scoping process. The EIR should consider both the potential project-specific (direct and indirect) and cumulative environmental impacts that could result from the implementation of the proposed project.

Pursuant to CEQA Guidelines Section 15121, the EIR is primarily an informational document intended to inform the public agency decision-makers and the general public of the potentially significant effects of a proposed project. The EIR should disclose all known potentially significant impacts; identify feasible means to minimize or mitigate those effects; and, consider a number of feasible alternatives to the project that might further reduce significant impacts while still attaining the project objectives. The decision-makers must consider the information in an EIR before taking action on the proposed project. The EIR may constitute substantial evidence in the record to support the agency's action on the project.

The EIR is prepared by or under the direction of the Lead Agency, which for the proposed Project is the City of Los Angeles Department of City Planning. The Department of City Planning is the public agency which has the primary responsibility for approving or carrying out the Project. Further, Responsible Agencies, which are public agencies that have a level of discretionary approval over some component of the proposed Project, may rely upon the EIR prepared by the Los Angeles Department of City Planning.

An EIR is prepared in two key stages. First, a Draft EIR is prepared and distributed for public and agency review. Once comments on the Draft EIR are received, responses to those comments and any additional relevant project information are prepared and compiled in a Final EIR. Both of these documents (i.e., the Draft EIR and the Final EIR), along with any related technical appendices, represent the complete record of the EIR. Throughout this document, the term EIR or Draft EIR may be used interchangeable since both are part of the ultimate EIR record; however, "Draft EIR" may be used specifically when referring to information provided

specifically in that volume. Similarly, these stages apply to a Supplemental EIR, which is a specific type of EIR to be prepared under specific circumstances (which are discussed below).

The Final EIR is used by the recommending bodies (i.e., hearing officer and City Planning Commission) and the final decision-makers (City Council) to weigh the environmental impacts against the proposed project.

2. PROJECT EIR PROCESS

This Supplemental EIR ("SEIR") has been prepared at the direction of and under the supervision of the Los Angeles Department of City Planning in accordance with CEQA and the Los Angeles CEQA Thresholds Guide (2006).

As discussed in *Section II: Project Description*, in 1993, the City of Los Angeles approved the addition of 700,000 square feet (i.e., the Master Plan) of additional floor area for medical center uses, with associated parking, at the CSMC Campus. In conjunction with that approval, the CSMC Master Plan EIR (the "Original EIR") (State Clearinghouse No. 90010839) was prepared and certified as a Project EIR. A full summary of the Original EIR impacts and mitigation measures is included as *Appendix B: 1993 CSMC Master Plan EIR Summary Table* to this Draft SEIR.

The Original EIR, which is fully incorporated herein, addressed the entire 700,000 square-foot Master Plan development, including the 170,650 square feet of vested development rights that remain unbuilt under the Master Plan and which will be combined with the proposed 200,000 square feet of floor area in the proposed Project. The 170,650 square feet of residual development rights were fully analyzed in the Original EIR. The Original EIR formed the basis of the "baseline" used during the Initial Study review for this current Project to characterize the "net" impact for the additional 100 inpatient beds and ancillary services (i.e., equivalent of 200,000 square feet of floor area for medical uses) and related parking comprising the Project.

The current Project is an amendment to the previously approved Master Plan, which was fully evaluated in the certified Original EIR. Because the Project has a clear connection to an earlier project, and is a modification to a previously considered project, the previously certified Original EIR has been incorporated by reference in this EIR. The previously approved Zone and Height District Change, Master Plan and associated Development Agreement, along with the Original EIR and associated ordinances, resolutions and findings are available for review at the City of Los Angeles, Department of City Planning, Environmental Review Section located at City Hall, 200 N. Spring Street, Room 750, Los Angeles, CA 90012.

Based on the Initial Study and EIR scoping process (see *Section I.A.4: Initial Study and NOP Process*, below), which relied upon information and conclusions from the Original EIR as well as current information, the Lead Agency determined that a SEIR should be prepared. Consistent with Public Resources Code Section 21166 and CEQA Guidelines Section 15163 (governing the preparation and use of a Supplemental EIR), the purpose of this SEIR is to provide minor additions and changes necessary to update the Original EIR to make it adequately apply to the Master Plan as revised by the Project. The City determined that implementation of the Project

may, either by itself and/or in conjunction with past, present and reasonably foreseeable future development in the Project vicinity, have additional significant environmental effect on some environmental issues not fully addressed in the Original EIR.

3. PROJECT APPROVAL AND INTENDED USES OF THIS EIR

In accordance with CEQA and its implementing guidelines, the purpose of this SEIR is to identify all potentially significant effects of the Project on the physical environment, to determine the extent to which those effects can be reduced or avoided and to identify and evaluate feasible alternatives to the Project. The City of Los Angeles will use this information when considering action on the Project. The SEIR itself is not a decision document and does not determine whether the Project will be approved. Rather, the SEIR is an informational and disclosure document to be taken under consideration during the decision-making process.

The City of Los Angeles, including its individual departments, and any Responsible Agencies providing approvals or permits will use the information contained in this EIR while determining whether to grant permits and approvals as described in the preceding section.

All of the square footage, except the 100 new inpatient beds and ancillary services (i.e., equivalent of 200,000 square feet of floor area), to be incorporated into the West Tower was fully analyzed by the Original EIR. The Original EIR also considered development of a parking structure with 650 parking spaces (the "Approved Parking Structure") at the Project Site, demolition of the existing surface parking lot (the "Existing Parking Lot"), landscaping and hardscape at the Project Site, directional and tenant signage for the Project Site, and security, ambient and accent lighting for the Project Site. Nonetheless, this SEIR considers the physical construction effects due to the similar levels of demolition and construction at the Project Site, as well as the "net" operational change in land use associated with the addition of 200,000 square feet of medical center (100 inpatient beds) uses.

4. INITIAL STUDY AND NOTICE OF PREPARATION

In compliance with the CEQA Guidelines, the City conducted an Initial Study of the Project and determined that an EIR would be required, and more specifically, that an SEIR (see *Section I.A.2: Project EIR Process*, above) would be the appropriate environmental document to analyze the Project's potential impacts on the environment, as there have been additions and changes to the CSMC Master Plan development, but they would not require major revisions to the 1993 Original EIR. The Initial Study identified a preliminary range of potential impact issues to be analyzed.

A Notice of Preparation ("NOP") was distributed to responsible and interested agencies/persons for the Project on March 7, 2008 for a 30-day review period as required by CEQA, to solicit comments on the proposed scope of the SEIR. Written comments were received on the NOP and have been reviewed and incorporated or discussed in this Draft SEIR. In addition, a public scoping meeting was held on March 27, 2008 at the CSMC Campus in Los Angeles, California to solicit additional input on the environmental review process. A copy of the NOP, Initial Study, and all written comments received relating to the NOP are included in *Appendix A-1:*

Notice of Preparation (NOP), Appendix A-2: Initial Study, Appendix A-3: NOP Written Comments and Appendix A-4: Public Scoping Meeting Comments of this Draft SEIR, respectively. NOP responses were received from the following:

Federal and State Agencies

- California Native American Heritage Commission
- California Office of Planning and Research, State Clearinghouse and Planning Unit

Regional, County, and Local Agencies

- City of Los Angeles Department of Water and Power
- Los Angeles County Metro (Metropolitan Transportation Authority)
- South Coast Air Quality Management District
- Southern California Association of Governments

Organizations and Special Interest Groups

- Robertson Properties Group (representing The Decurion Corporation)
- Lake & Lake Consulting, Inc.
- West Hollywood West Residents Association

Based on the scoping process, which considered conclusions from the previously certified Original EIR, current conditions and public input, this Draft Supplemental EIR is focused on the following topical issue sections:

Aesthetics	Section IV.A
Air Quality	Section IV.B
Noise	Section IV.C
Transportation and Circulation	Section IV.D
Cumulative Effects	Section IV.E

This SEIR includes analysis of the above environmental impacts and recommends mitigation measures to reduce potentially significant impacts. In accordance with CEQA Guidelines Section 15128, other possible effects of the Project, which were determined to be not significant through the Initial Study review and NOP scoping process, are not discussed in detail in this EIR. Those possible effects that did not warrant detailed analyses are identified in *Section VI: Other Environmental Considerations: A-Effects Not Found To Be Significant* of the Draft SEIR.

5. REVIEW OF THE DRAFT SEIR

This Draft SEIR was distributed to responsible and other affected agencies, surrounding jurisdictions, interested parties, and others who requested a copy of the document in accordance with the Public Resources Code Section 21092. The Notice of Completion ("NOC") of this Draft SEIR was also distributed as required by CEQA. The Draft SEIR will be available for public review for not less than 45 days, pursuant to Section 15105 of the State CEQA

Guidelines. During this public review period, the Draft SEIR including its technical appendices is available for review at the following location:

City of Los Angeles
Department of City Planning, City Hall
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Written comments on the Draft SEIR should be addressed to Adam Villani at the Environmental Review Section of the Department of City Planning (Lead Agency) at the address provided above. Upon completion of the 45-day public review period and conclusion of public hearings on the Project, written responses will be prepared to address comments received on the Draft SEIR and will be made available for review at least ten days prior to when certification of the SEIR is considered by the City of Los Angeles Planning Commission and ultimately the City Council. These environmental comments and their responses will be included as part of the environmental record for consideration by the decision-makers for the Project and will constitute the Final SEIR.

I. INTRODUCTION

B. RELATIONSHIP TO PREVIOUS EIR

As discussed above and in *Section II: Project Description* of this Draft SEIR, in 1993, the City approved the CSMC Master Plan comprised of 700,000 square feet of floor area for additional medical uses, with associated parking, at the existing CSMC Campus. In conjunction with the Master Plan, the Original EIR was prepared and certified as a Project EIR. A full summary of the Original EIR impacts and mitigation measures is included as *Appendix B: 1993 CSMC Master Plan EIR Summary Chart* to this Draft SEIR.

The Project (described in *Section II: Project Description* of this Draft SEIR) proposes a Master Plan Amendment to address the addition of 100 inpatient beds and ancillary services within 200,000 square feet of additional floor area, the construction of a 700-space adjoining parking structure, and the demolition of the Existing Building currently on the Project Site. If the Project is approved, the Master Plan as amended would include a total of 900,000 square feet of floor area and 3,250 parking spaces.

In accordance with CEQA Section 21166 and CEQA Guidelines Sections 15162 and 15163, the City considered whether the Project's proposed amendment 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 studied in the Original EIR or a substantial increase in the severity of any significant impact previously identified in the Original EIR;(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;(3) bring to light 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).

Based on its review, as documented in the Initial Study (see *Appendix A-2: Initial Study* of this Draft SEIR), which relied on information and conclusions from the Original EIR as well as current information, the City determined that an SEIR should be prepared. Consistent with Public Resources Code Section 21166 and CEQA Guidelines Section 15163 (governing the preparation and use of a Supplemental EIR), the purpose of this SEIR is to provide minor additions and changes necessary to update the Original EIR to make it adequately apply to the Master Plan as amended by the Project.

Because the current Project is a revision of the Master Plan, which was fully evaluated in the previously certified Original EIR, and not a new project, the previously certified Original EIR has been incorporated by reference in this Draft SEIR.

The Original EIR is used in this SEIR to establish the "baseline" against which the Project is evaluated. A full description of the baseline is provided in *Section III.C: Project Baseline* of this Draft SEIR. Specifically, the Original EIR is used to: 1) identify impacts that are already known to be less than significant; 2) quantify and/or summarize the level of impact associated with the

previously approved 170,650 square feet of remaining unbuilt entitlement under the approved Master Plan; 3) establish the previously accepted level of impact, to which the incremental effects of the Project will be considered; and 4) define and evaluate a reasonable range of Project alternatives.

I. INTRODUCTION

C. ORGANIZATION OF THIS SEIR

This Draft SEIR conforms to the content requirements stated in Sections 15120 through 15130 of the State CEQA Guidelines. A list of the overall document sections and a brief description of their content is provided here to assist the reader in locating information.

Section 0: Executive Summary: Located at the front of this document, the Executive Summary provides a brief description of the Project, including an overview of the impact analysis, recommended mitigation measures, and net residual impact. Summary information of alternatives and key conclusions are also provided.

Section I: Introduction: The Introduction provides a general orientation to the purpose of CEQA and this Draft SEIR, including the scoping of this Draft SEIR, availability of documents, and review process.

Section II: Project Description: Section II presents a statement of the Project objectives, a detailed description of the Project's physical development characteristics, and related information on phasing and implementation.

Section III: General Overview and Environmental Setting: This section discusses the location and general characteristics of the Project Site within a regional setting context. It also provides an overview of the site-specific environmental setting and immediate surrounding area.

Section IV: Environmental Impact Analysis: This section analyzes the potential impacts from implementation of the Project. The impact discussion is organized by topical issues as outlined in the Initial Study. A summary of applicable Original EIR conclusions is provided for each topical issue discussed in this Draft SEIR. Background information has been updated as appropriate, and a Project-specific level of analysis is provided to address implementation of the Project. Mitigation Measures are recommended as necessary.

Section VI: Alternatives: The Alternatives section includes a discussion and analysis of alternatives to the proposed Project pursuant to Section 15126.6 of the CEQA Guidelines. Alternatives are analyzed that would feasibly attain most of the basic objectives of the Project, but would avoid or lessen any of the significant effects of the Project. The comparative merits of each alternative are evaluated.

Section V: Other Environmental Considerations: Section V evaluates the contextual impacts related to growth-inducing effects and cumulative growth. Impacts found not to be significant, unavoidable adverse impacts, and irreversible impacts are also summarized.

Section VII: Persons and Organizations Consulted: Section VIII lists persons that directly contributed to the preparation of this Draft SEIR.

Section VIII: References: This section includes a listing of sources of information referenced for the analyses contained within this Draft SEIR.

II. PROJECT DESCRIPTION

A. PROJECT APPLICANT

The Applicant for the proposed Project is Cedars-Sinai Medical Center, a California non-profit public benefit corporation ("CSMC" or "Applicant"), located at 8720 Beverly Boulevard, Los Angeles, California 90048.

II. PROJECT DESCRIPTION

B. PROJECT LOCATION

The proposed project (the "Project") is located within the Cedars-Sinai Medical Center Campus (the "CSMC Campus" or the "Property"), which is comprised of approximately 24.1 net acres located at 8720 Beverly Boulevard in the Wilshire Community Plan Area of the City of Los Angeles (see *Figure 1: Regional Location*). The CSMC Campus 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 *Figure 2: Local Vicinity*). 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.

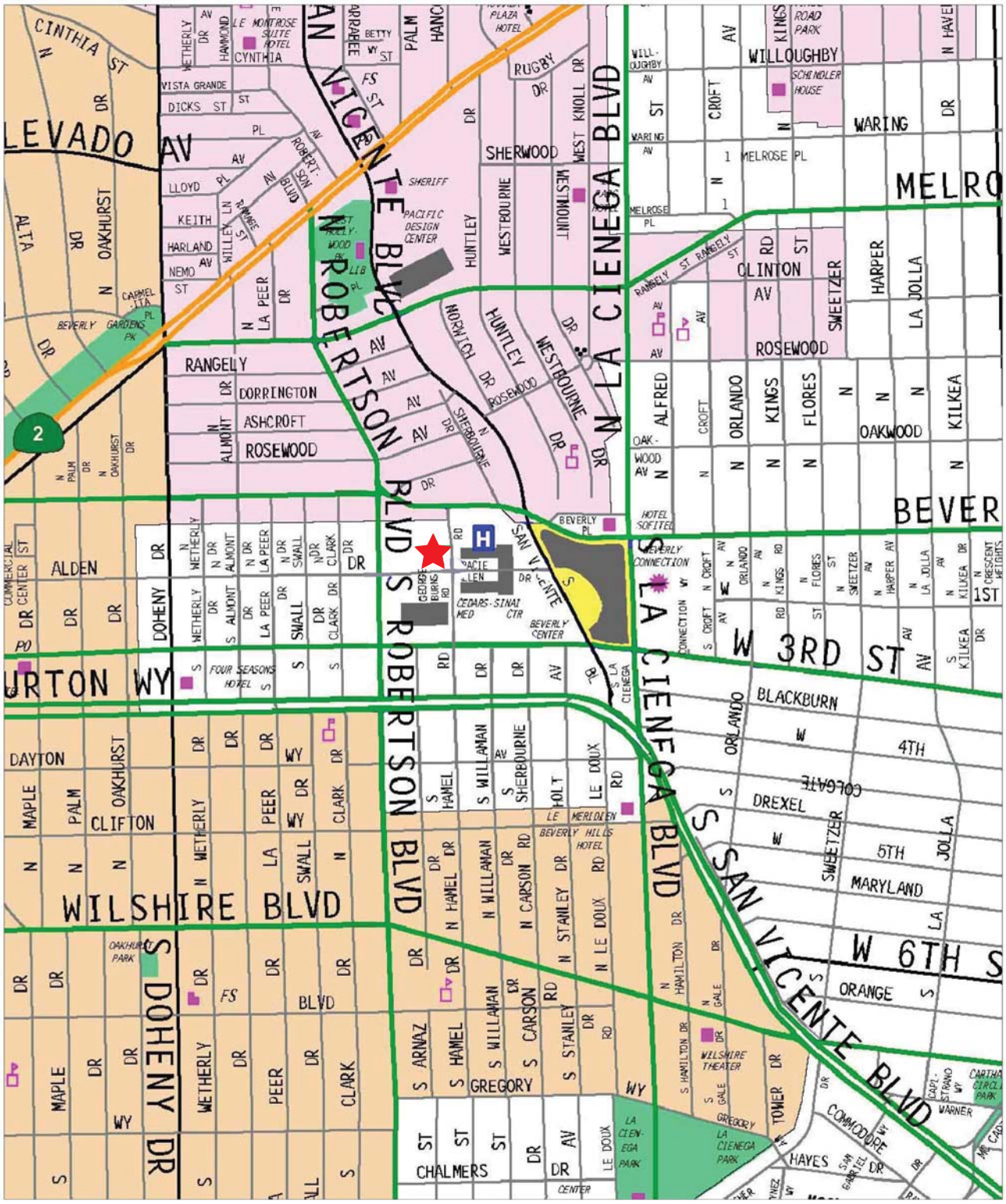
Specifically, the Project is proposed on approximately 2.65 net acres at the northwest corner of Gracie Allen Drive and George Burns Road (the "Project Site"), which is currently occupied by a 90,000 square-foot, two-story medical service building (the "Existing Building") and a surface-level, visitor parking lot ("Existing Parking Lot").

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; commercial and residential uses to the north, east, and west; and the City of West Hollywood border to the north (see *Figure 3: Aerial Overview and Surrounding Uses*). Several commercial uses are located directly adjacent to the western and southern edges of the CSMC Campus. The Beverly Center shopping complex is located directly east of the Property, across San Vicente Boulevard. A more detailed discussion of the on-site and surrounding land uses is provided in *Section III: General Description of Environmental Setting* and *Section IV.A: Aesthetics* of this Draft SEIR.

FIGURE 1
REGIONAL LOCATION

SOURCE: MAPS.GOOGLE.COM

NORTH



PROJECT SITE

FIGURE 2
LOCAL VICINITY

SOURCE: THOMAS BROS. GUIDE

FIGURE 3
AERIAL OVERVIEW AND SURROUNDING USES

SOURCE: PLANNING ASSOCIATES, INC.

II. PROJECT DESCRIPTION

C. BACKGROUND

The Project Site is located within the Wilshire Planning District. The Wilshire Community Plan, which serves as a guide for development and land uses in the area, establishes a land use designation for the Project Site as both Regional Commercial and Health Center (see *Figure 4: Community Plan Designation*).

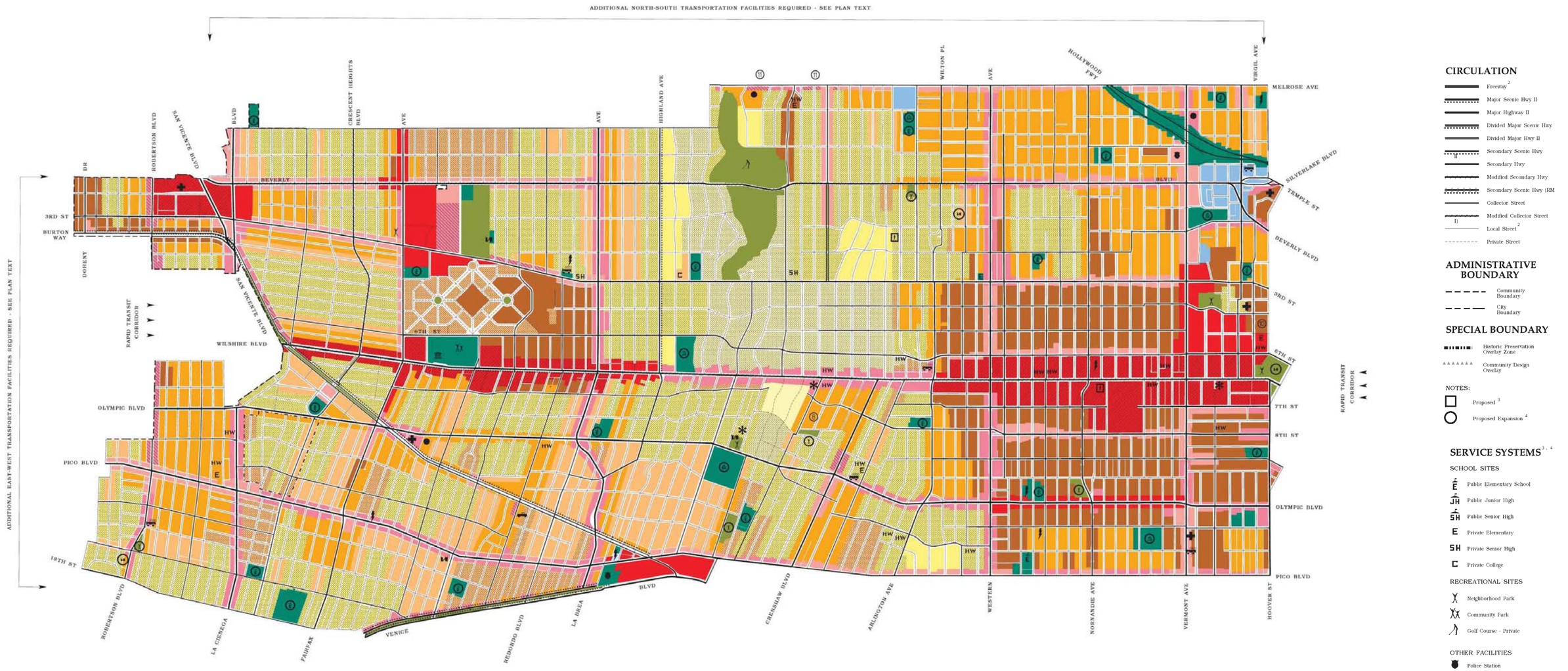
In August of 1993, the City of Los Angeles (the "City") approved a Master Plan for the CSMC Campus (the "Master Plan"), which allows 700,000 square feet of floor area[1] of additional development to the established CSMC on the Property (see *Figure 5: Master Plan Site Plan*). The City approved the Master 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 Zone Change consisted of a change of the zoning and height district from the previous [Q]C2-2D-O, [Q]C2-1-O, and C2-1-O to the current [T][Q]C2-2D-O for the whole CSMC Campus (see *Figure 6: Zoning Map*). 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). The Original EIR is fully incorporated herein. *Appendix B: 1993 CSMC Master Plan EIR Summary Chart*, provides a summary of the impacts and adopted mitigation measures from the Original EIR. More detailed discussions of the Original EIR and comparative descriptions relative to the Project are provided as appropriate, in the analysis sections in *Section IV: Environmental Impact Analysis* of this Draft SEIR.

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 178,866, CPC No. 1992-534-DA-M1). All entitlements approved under the Master Plan and the Development Agreement are vested until 2023. A copy of the adopted Development Agreement, as amended, is included for reference as *Appendix C: 1993 CSMC Development Agreement* of the Draft SEIR.

The Master Plan and Development Agreement, which provided for the development of an integrated medical center comprised of multiple buildings in a campus-style setting (see *Figure 5: Master Plan Site Plan*), approved three new structures and certain expansion areas for the Property:

- Outpatient Treatment and Diagnostic Center (340,000 square feet of Medical Suites, Diagnostic, and Support uses);

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



CIRCULATION

- Freeway [2]
- Major Scenic Hwy II
- Major Highway II
- Divided Major Scenic Hwy
- Divided Major Hwy II
- Secondary Scenic Hwy
- Secondary Hwy
- Modified Secondary Hwy
- Secondary Scenic Hwy (RM
- Collector Street
- Modified Collector Street
- Local Street [2]
- Private Street

ADMINISTRATIVE BOUNDARY

- Community Boundary
- City Boundary

SPECIAL BOUNDARY

- Historic Preservation Overlay Zone
- Community Design Overlay

NOTES:

- Proposed [3]
- Proposed Expansion [4]

SERVICE SYSTEMS [3, 4]

SCHOOL SITES

- Public Elementary School
- Public Junior High
- Public Senior High
- Private Elementary
- Private Senior High
- Private College

RECREATIONAL SITES

- Neighborhood Park
- Community Park
- Golf Course - Private

OTHER FACILITIES

- Police Station
- Fire Station
- Community Library
- Power Distribution Station
- Maintenance Yard
- Cultural & Historical Monument
- Health Center
- Water Tank Reservoir
- Museum
- House Of Worship

LAND USE

RESIDENTIAL	CORRESPONDING ZONES [12]
SINGLE FAMILY	
VERY LOW I	RE20.RA
VERY LOW II	RE15.RE11
LOW I	RE9
LOW II	R1.RS.RD6 [1]
MULTIPLE FAMILY	
LOW MEDIUM I	R2.RD3.RD4.RZ3. RZ4.RU.RW1
LOW MEDIUM II	RD1.5.RD2.RW2. RZ2.5
MEDIUM	R3
HIGH MEDIUM [6]	R4

COMMERCIAL [7]	
NEIGHBORHOOD	C1.C1.5.C2.C4. [5] P CR.RAS3.RAS4
LIMITED	CR.C1.C1.5.P. [5] RAS3.RAS4
GENERAL	C1.5.C2.C4. [5] RAS3.RAS4
COMMUNITY	CR.C2.C4 [5].P.PB RAS3.RAS4.P.PB
REGIONAL	CR.C1.5.C2.C4 [5].P.PB RAS3.RAS4.R3.R4.R5

INDUSTRIAL [7]	
COMMERCIAL MANUFACTURING	CM.P
LIMITED	CM.MR1.M1.P

OPEN SPACE. PUBLIC FACILITIES	
OPEN SPACE	OS.A1
PUBLIC [13] FACILITIES	PF

FOOTNOTES

1. RD6 Zone permits apartments and attached housing.
2. Local streets and freeway interchanges are shown for reference only.
3. Boxed symbol denotes the general location of a potential facility. The symbol does not designate specific private property for acquisition.
4. Circled symbol indicates proposed site expansion.
5. Height District No. 1.
6. Height District No. 2.
7. Includes associated parking.
8. Development of 8th Street in the Freemont Place area to Collector Street standards will be necessary if and when the area is redeveloped.
9. The high medium density housing between Third Street and Olympic Boulevard East of Wilton Place may be built to Height District No. 2.
10. The high medium density housing area on the west side of Commonwealth between Fourth and Fifth Streets includes parking rights for adjoining commercial uses.
11. This limited commercial is limited to Height District 1VL.
12. Each Plan category permits all indicated corresponding zones as well as those zones referenced in the Los Angeles Municipal Code (LAMC) as permitted by such zones unless further restricted by adopted Specific Plans, specific conditions and/or limitations of project approval, plan footnotes or other Plan map or text notations.

    Zones established in the LAMC subsequent to the adoption of the Plan shall not be deemed as corresponding to any particular Plan category unless the Plan is amended to so indicate.

    It is the intent of the Plan that the entitlements granted shall be one of the zone designations within the corresponding zones shown on the Plan, unless accompanied by a concurrent Plan Amendment.
13. The Public Facility (PF) planning land use designation is premised on the ownership and use of the property by a government agency. The designation of the PF Zone as a corresponding zone is based on the same premise. The Plan also intends that when a board or governing body of a government agency officially determines that a property zoned PF is surplus, and no other public agency has indicated an intent to acquire, and the City is notified that the agency intends to offer the property for sale to a private purchaser, then the property may be rezoned to the zone(s) most consistent within 500 feet of the property boundary and still be considered consistent with the adopted Plan.

* Bikeways are shown on the Citywide Bikeways System maps contained in the City's Bicycle Plan, a part of the Transportation Element of the General Plan, which was adopted by the City Council on August 6, 1996.

FIGURE 4
COMMUNITY PLAN DESIGNATION

SOURCE: PLANNING ASSOCIATES, INC.

NORTH

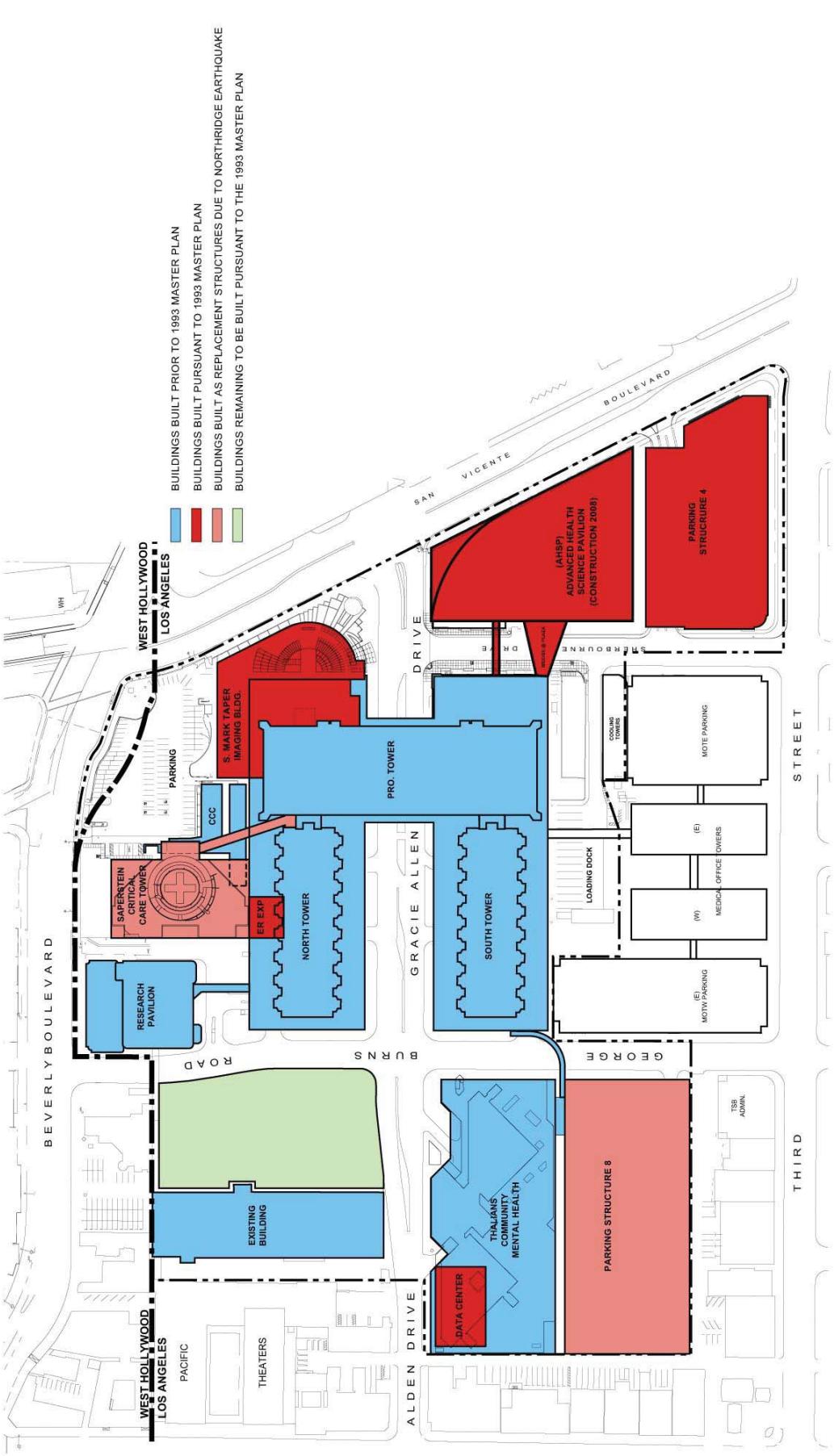


FIGURE 5
MASTER PLAN SITE PLAN

SOURCE: HOK

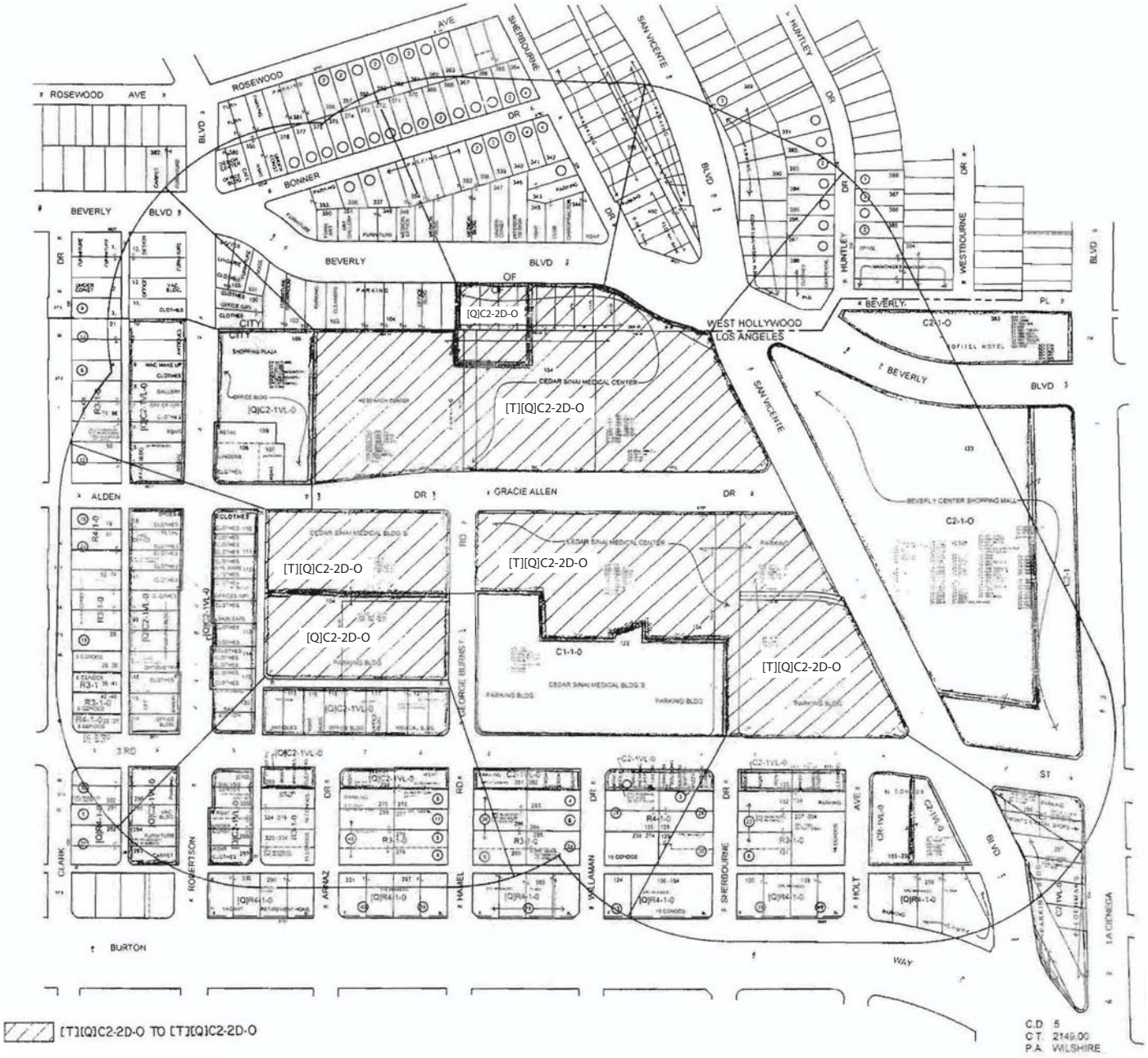


FIGURE 6
ZONING MAP

SOURCE: PLANNING ASSOCIATES, INC.

NORTH

- Organ Transplant Wing (170,000 square feet with up to 110 hospital beds); and
- Approved Building (127,500 square feet with up to 200 hospital beds).

The Master Plan also approved infill space:

- Administration space (23,300 square feet);
- Emergency Room expansion (3,700 square feet); and
- Computer Services facility (14,500 square feet).

As a result of damage incurred to the Property by the 1994 Northridge earthquake, CSMC focused its subsequent 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 the first quarter of 2009, 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. The 396,000 square-foot Pavilion, which is being built pursuant to the Master Plan, will be 185 feet tall, with 11 stories, including 381 new parking spaces.[2] After construction of the Pavilion, a total of 170,650 square feet of development rights will remain under the Master Plan. An overview of development completed pursuant to the Master Plan is provided in *Table 1: Summary of Master Plan Development Completed Through 2008*.

TABLE 1
SUMMARY OF MASTER PLAN DEVELOPMENT COMPLETED THROUGH 2008

Original Development Grant (square feet [sf] per Master Plan)	Computer Room Development	Pediatric Balcony Enclosure	Emergency Room Expansion	Imaging Bldg. Development	Existing Building Elevator Installation	Saperstein Critical Care Tower	Advanced Health Sciences Pavilion (Construction beginning 2009)	Remaining Development Rights In 2008
Medical Suites (209,000 sf)							121,100	87,900
Diagnostic (90,000 sf)				12,000			44,500	33,500
Support (41,000 sf)				14,378			15,600	11,022
Organ Transplant (170,000 sf)						59,849	110,151	0
Rehabilitation (127,500 sf)							94,500	33,000
Imaging (21,000 sf)				21,000				0

[2] The new 381 parking spaces accounts for demolition of the existing 166-space parking lot at the Advanced Health Sciences Pavilion site and construction of 547 new parking spaces (547 – 166 = 381 net additional new spaces).

TABLE 1 (CONTINUED)
SUMMARY OF MASTER PLAN DEVELOPMENT COMPLETED THROUGH 2008

Original Development Grant (square feet [sf] per Master Plan)	Computer Room Development	Pediatric Balcony Enclosure	Emergency Room Expansion	Imaging Bldg. Development	Existing Building Elevator Installation	Saperstein Critical Care Tower	Advanced Health Sciences Pavilion (Construction beginning 2008)	Remaining Development Rights In 2008
Administrative (23,300 sf)		1,000	6,405		628		10,149	5,118
Emergency Room (3,700 sf)			3,590					110
Computer Service (14,500 sf)	14,500							0
Total	**14,500**	**1,000**	**9,995**	**47,378**	**628**	**59,849**	**396,000**	**170,650**

As summarized in *Table 1: Summary of Master Plan Development Completed Through 2008*, a total of 170,650 square feet of vested development rights, which were fully analyzed in the Original EIR, will remain under the Master Plan after construction of the Pavilion. The Original EIR, including the Findings and Statement of Overriding Considerations is incorporated by reference in this SEIR and is available for public review at the 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.

II. PROJECT DESCRIPTION

D. STATEMENT OF PROJECT OBJECTIVES

In accordance with Section 15124(b) of the State CEQA Guidelines, an EIR shall include "a statement of objectives sought by the proposed project." Section 15124(b) of the CEQA Guidelines further clarifies that "the statement of objectives should include the underlying purpose of the project."

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 Applicant's Project has the following objectives:

- To continue to provide high quality medical services and advanced research capabilities at the CSMC Campus;
- To accomplish better utilization of limited CSMC Campus space;
- To provide an additional 100 inpatient beds in the Southern California region, which has been consistently losing beds and other inpatient medical services over the last decade;[3]
- To provide a public benefit and fulfill a healthcare need for the community and region;
- To facilitate a balanced distribution of healthcare, emergency room and trauma services throughout the Los Angeles region;
- To support improved medical technologies that will enhance CSMC's ability to provide high quality medical care to the community;
- To provide needed inpatient diagnostic and treatment facilities, research facilities, medical suites, and administrative space to support customer and community demand for these services;
- To remain committed to fulfilling the intent of the Master Plan and demonstrating consistency with the City of Los Angeles comprehensive planning programs;
- To provide development that is thoughtfully designed, reflects a refined cohesive image of the CSMC Campus as an integrated complex of buildings and functions, and which balances with the surrounding community;

[3] According to the California Office of Statewide Healthcare Planning and Development (OSHPD), from the year 1995 to 2006, the total number of licensed beds in Los Angeles County has decreased by 17.8%. Additionally, in terms of medical services, the number of hospital closures between 1997 and 2007 totals 28 in Los Angeles County (Cousineau, Michael R., *Healthcare Summit*, 2008).

- To provide adequate and convenient parking for each CSMC Campus component, including the Project; and

- To provide improvements to the pedestrian and vehicular circulation patterns within the CSMC Campus that will maintain and improve accessibility, safety, efficiency and convenience for patients, visitors, and staff.

II. PROJECT DESCRIPTION

E. REQUESTED ACTIONS AND ENTITLEMENTS

The Applicant requests approval of a Zone Change and Height District Change to revise the conditions of the current [T][Q]C2-2D-O zoning designation and an amendment to the existing Development Agreement and Master Plan to permit an additional 100 inpatient beds and ancillary services (equivalent to 200,000 square feet of floor area), and parking on the CSMC Campus.

This Draft SEIR may be used by various governmental decision-makers for the following discretionary permits and actions that are necessary or may be requested in connection with the Project, as well as any other discretionary permits and actions that may be identified during the environmental review and entitlement process:

- Zone Change to amend the conditions of the [T][Q]C2-2D-O zoning designation and 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 amend 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[4] for necessary street, sewer, storm drain, and lighting improvements;

- Grading Permits;

- Demolition Permits;

- Building Permits; and

- Any other necessary discretionary or ministerial permits and approvals required for the construction or operation of the Project.

[4] B-Permits are permits for development of public improvements (i.e., streets, sewers, storm drains, and street lights) within the public right-of-way issued by the Los Angeles Department of Public Works.

Zone Change (Conditions and Height District)

The Applicant is requesting a Zone Change to amend the conditions of adopted Ordinance No. 168,847. This Zone Change will authorize the addition of 100 new inpatient beds and ancillary services, or the equivalent of 200,000 square feet of development entitlement, on the CSMC Campus and would be consistent with the proposed amendments to the Development Agreement and Master Plan. The Existing Building site and associated surface parking lot at the northwest corner of George Burns Road and Gracie Allen Drive (i.e., the "Project Site") is the proposed location for the additional floor area.

The entire Property is currently zoned [T][Q]C2-2D-O with a maximum building height of 185 feet above grade. The requested Zone Change with new and revised conditions will be consistent with the Wilshire Community Plan and the established zoning on the Property. The established zoning of [T][Q]C2-2D-O over the building site and campus supports the use, density, and height of the Project, including the additional 100 inpatient beds (equivalent to 200,000 square feet of floor area) over the Master Plan approval. Only the conditions imposed on the current zoning will be revised.

Development Agreement and Master Plan Amendments

On August 12, 1993, the City of Los Angeles entered into a Development Agreement with the Applicant that approved the Master Plan and vested expansion of 700,000 square feet of authorized development on the Property 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). On August 10, 2007 the City approved an amendment to the Master Plan and Development Agreement to extend the term for an additional 15 years, until August 11, 2023 (City Council Ordinance 178866, CPC No. 1992-534-DA-M1).

The Development Agreement exempts development under the Master Plan from further discretionary approvals by the City. In particular, Section 3.5 of the Development Agreement exempts future Master Plan approvals from the Site Plan Review provisions of LAMC Section 16.05.

The proposed amendments to the Development Agreement and Master Plan would vest an additional 100 inpatient beds and ancillary services including parking (or the equivalent of 200,000 square feet of floor area for new medical center uses) proposed by the Project.

Construction Related Permits

Construction of the Project will require that the Applicant obtain the appropriate demolition, grading, building, and service connection permits. In furtherance of obtaining these permits, the Applicant will submit and obtain approval of various informational and engineering documents, including information for truck and hauling routes to be used during the construction phase.

II. PROJECT DESCRIPTION

F. PROJECT CHARACTERISTICS

Overview

The Project consists of a Zone Change, Height District Change, Master Plan Amendment and Development Agreement Amendment to increase medical center uses at the CSMC Campus by 100 new inpatient beds and ancillary services (or the equivalent of 200,000 square feet of floor area), including an adjoining parking structure . 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 460,650 square feet in floor area (the "West Tower"), along with an adjoining 7-level (700 space) parking structure. Specifically, only 200,000 square feet of the total 460,650 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 170,650 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.

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 170,650 square feet previously approved and vested by the CSMC Master Plan and Development Agreement and 90,000 square feet from the Existing Building to construct the new West Tower facility, with pedestrian bridge connections to the adjacent North Tower;

- Demolition of the 90,000 square-foot Existing Building and adjacent Existing Parking Lot;

- Construction of a 7-level (700 space) adjoining parking structure;

Proposed Land Uses

The Project involves the addition of 100 new inpatient beds (200,000 square feet of medical center uses). All the square footage to be contained in the West Tower, except the new 200,000 square feet, was fully analyzed by the Original EIR. This SEIR analyzes the net change in land use, as well as the demolition and construction related impacts associated with the West Tower.

The West Tower will accommodate a mix of medical center uses, as shown in *Table 2: Summary of Uses and Square Footages in Project*.

TABLE 2
SUMMARY OF USES AND SQUARE FOOTAGES IN PROJECT

Floor Level	Total SF (LAMC Floor Area)	Proposed Functions	Replacement of Existing Building	Previously Approved & Vested Development	Proposed Additional Development
B1	41,022	Research Support	Research 30,000	Support 11,022	
Ground	40,610	Diagnostic/ER Administrative	Administrative 7,000	Diagnostic/ER 33,610	
2	41,118	Research Administrative	Administrative 23,000	Rehabilitation 13,000 Administrative 5,118	
3	39,900	Research Medical Suites		Rehabilitation 20,000 Medical Suites 19,900	
4	41,000	Inpatient			Inpatient 41,000
5	41,000	Inpatient			Inpatient 41,000
6	37,000	Inpatient			Inpatient 37,000
7	37,000	Inpatient			Inpatient 37,000
8	37,000	Inpatient			Inpatient 37,000
9	37,000	Medical Suites Inpatient	Medical Suites 30,000		Inpatient 7,000
10	34,000	Medical Suites		Medical Suites 34,000	
11	34,000	Medical Suites		Medical Suites 34,000	

The floor area ratio ("FAR") for the Project will not exceed 6:1 on the Project Site, nor exceed 2.71:1 net FAR for the entire CSMC Campus (i.e., Master Plan area). The total gross floor area contained in all buildings on the CSMC Campus would not exceed 2.62 million square feet.

The new 100 inpatient beds, or 200,000 square feet of additional authorized floor area on the CSMC Campus will permit expansion of vital functions and services for patients of CSMC and the surrounding community located in a central and convenient location within the CSMC Campus.

Site Plan Layout, Circulation and Access

Figure 7: Proposed Site Plan, shows the Project relative to the existing structures within the CSMC Campus. Generally, the new parking structure will be located on the site of the Existing Building at the western portion of the Project Site, and the West Tower structure will be situated on the eastern portion of the Project Site, on an area currently occupied by the Existing Parking Lot.

Providing an additional 100 inpatient beds, or 200,000 square feet of expanded hospital space, at this location will utilize the Project Site at a more appropriate intensity and size. Currently, the Existing Building and Existing Parking Lot at this central Campus location are considered underutilized by the Applicant based on existing Campus- wide zoning and the current Master Plan.

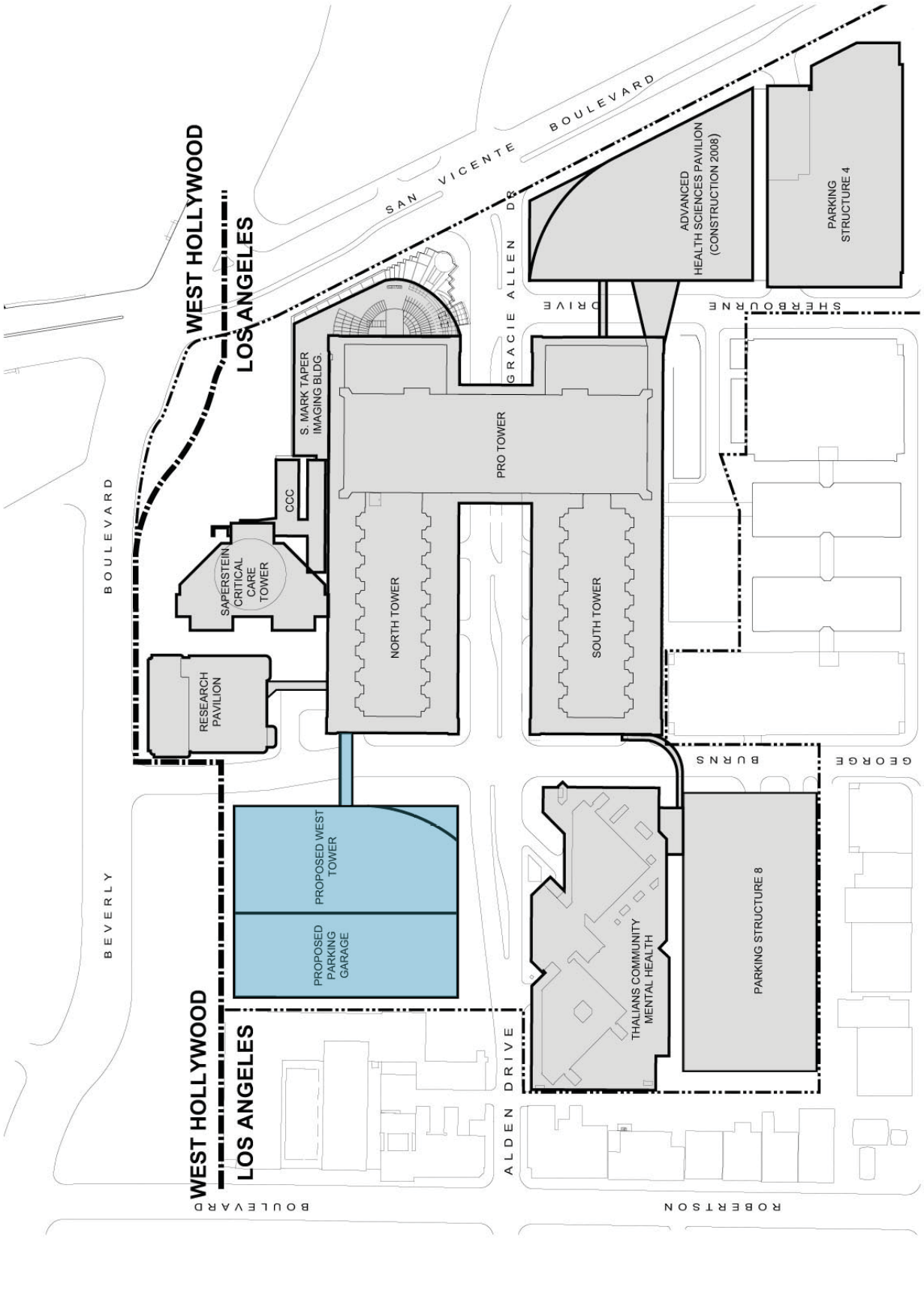


FIGURE 7
PROPOSED SITE PLAN

SOURCE: HOK

Therefore, limited acreage on the CSMC Campus will be used more efficiently and consistently relative to existing development intensities. Accommodating a higher intensity of development at the centrally-located Project Site will allow for a more efficient use of the Property's space and a more cohesive core of inpatient services.

The new facility will have two vehicular access points leading to the parking facilities. These access driveways will be located on Gracie Allen Drive, between George Burns Road and Robertson Boulevard. Access to the West Tower and the revised CSMC Campus circulation is shown on *Figure 8: Site Access and Pedestrian Circulation.* The circulation plan considers a ground-level vehicular access program through the existing network of private streets, a ground-level pedestrian plan, which utilizes a series of public and private sidewalks, walkways and external street-level and internal parking-level entrances. In addition, the Campus Plan incorporates an inter-building circulation program through a series of pedestrian bridges and public building corridors.

Building Elevations and Architectural Treatment

Figure 9: Proposed Building Section, *Figure 10: Proposed Building Plan 1*, and *Figure 11: Proposed Building Plan 2*, show the general configuration for the West Tower and attached parking structure. The West Tower will be 11 stories tall and up to 185 feet in height. The adjoining parking structure garage will be seven levels and 35 feet tall. The main entrance of the building will face George Burns Road. The West Tower will be connected via a pedestrian bridge (at Level 3) extending over George Burns Road to the existing inpatient buildings (North Tower) to the east. The bridge will allow inpatient services at the hospital to operate in a more efficient manner. Containing all inpatient care within a cohesive core of inter-connected facilities will improve the efficiency of patient transfers and emergency room services, as well as convenience to doctors, staff, patients, and visitors.

No building or structure on the subject property shall exceed 185 feet in height above grade as defined by Los Angeles Municipal Code Sections 12.21.1-B.3a and b. The West Tower façade will be treated with a combination of stone and glass as shown in *Figure 12: Proposed Building Perspectives: View From Gracie Allen Drive* and *Figure 13: Proposed Building Perspectives: View From Beverly Boulevard*.

The Project will be designed in accordance with the LAMC with regards to graffiti removal and deterrence. Specifically, the first nine feet of exterior walls and doors, measured from grade, and all of any walls enclosing the property will be built and maintained with a graffiti-resistant finish consisting of either hard, smooth, impermeable surfaces such as ceramic tile, baked enamel or a renewable coating of an approved, anti-graffiti material or a combination of both. Additionally, portions of exterior non-glass walls may be covered with clinging vines, screened by oleander trees or similar vegetation capable of covering or screening entire walls up to the height of at least 9 feet, and will be coordinated through the Landscape Plan.

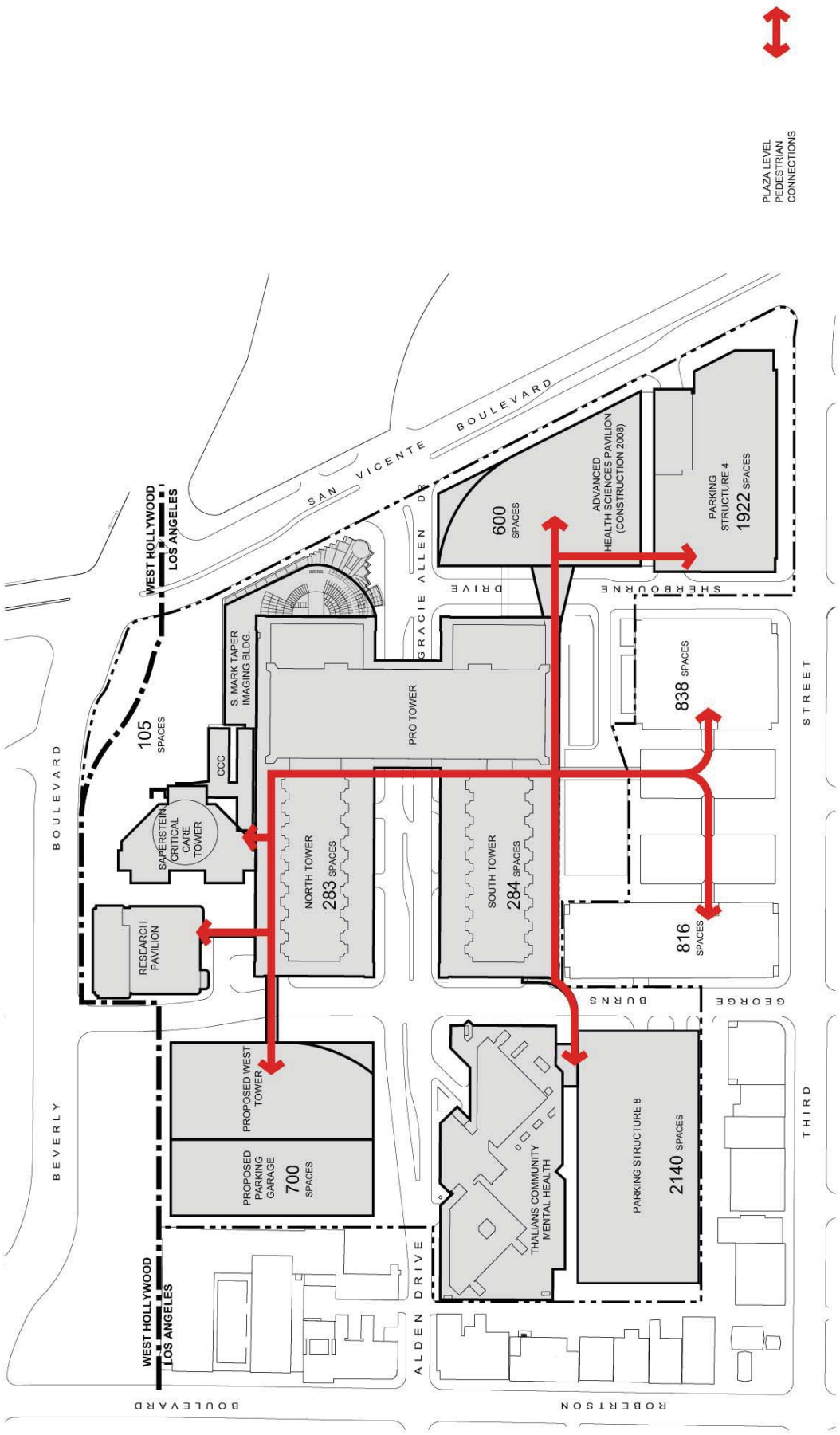


FIGURE 8
SITE ACCESS AND PEDESTRIAN CIRCULATION

SOURCE: HOK

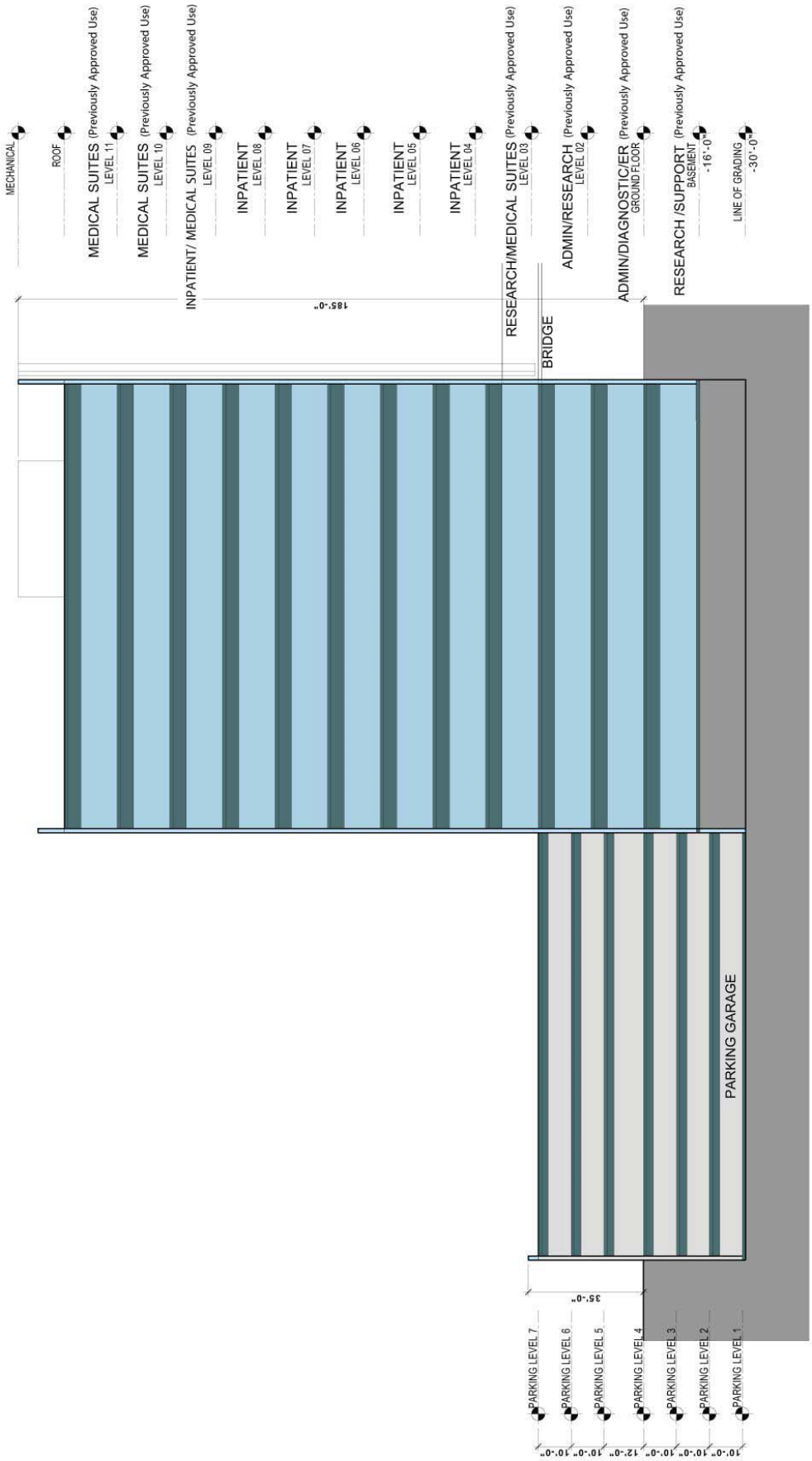


FIGURE 9
PROPOSED BUILDING SECTION

SOURCE: HOK

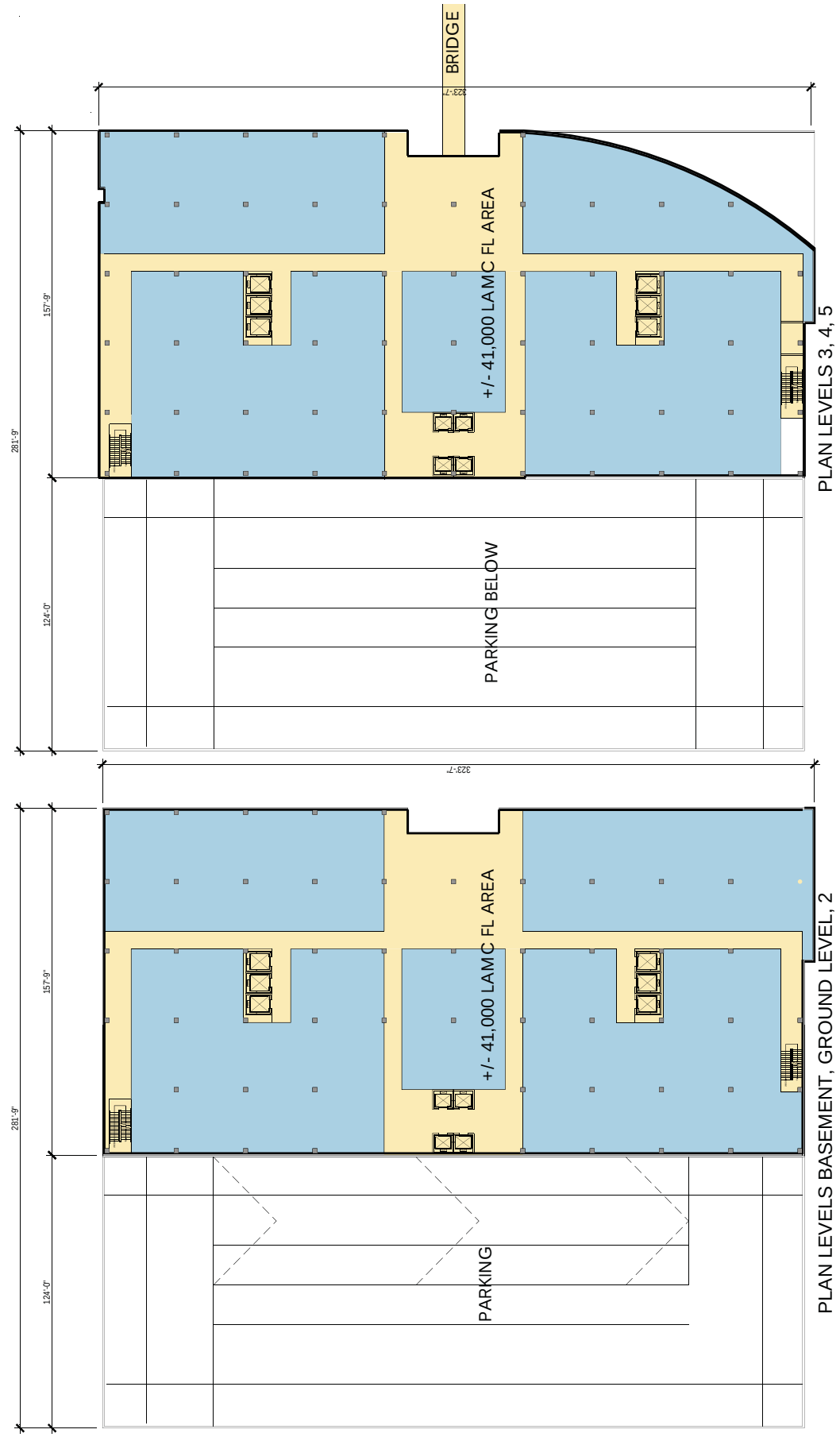


FIGURE 10
PROPOSED BUILDING FLOOR PLANS 1

SOURCE: HOK

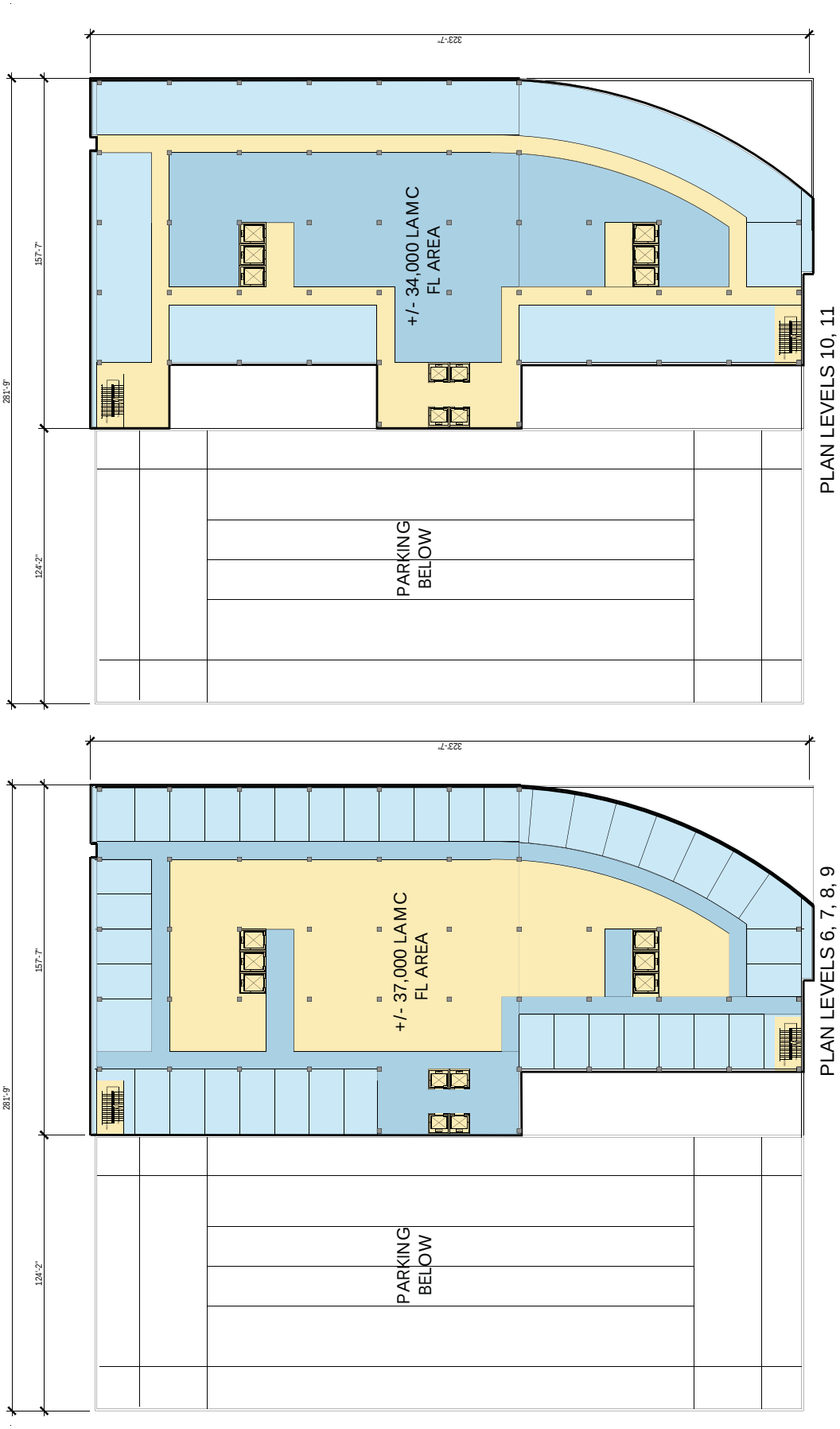


FIGURE 11
PROPOSED BUILDING FLOOR PLANS 2

SOURCE: HOK

FIGURE 12
PROPOSED BUILDING PERSPECTIVES: VIEW FROM GRACIE ALLEN DRIVE

SOURCE: HOK

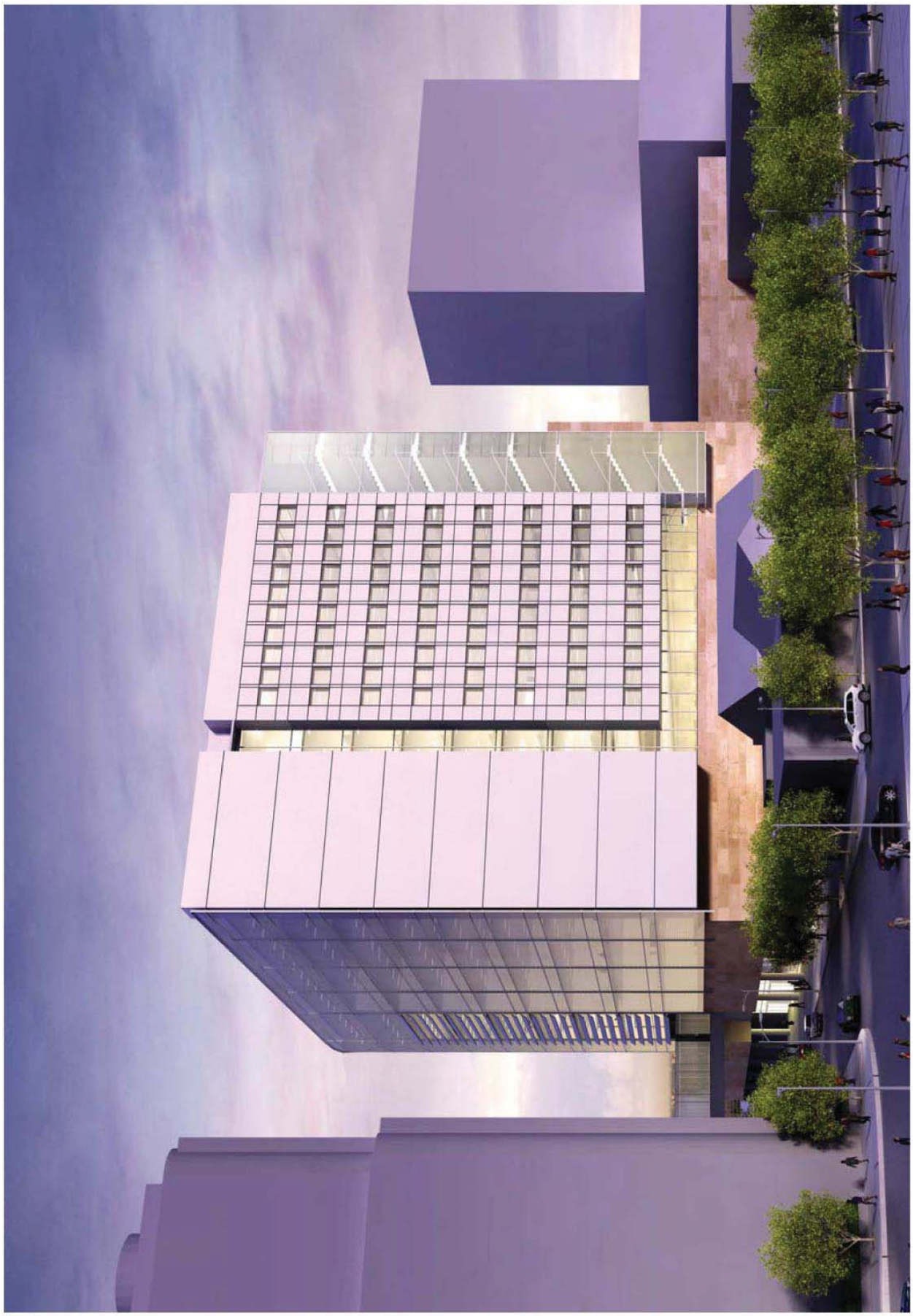


FIGURE 13
PROPOSED BUILDING PERSPECTIVES: VIEW FROM BEVERLY BOULEVARD

SOURCE: HOK

Parking

The Project will provide a 35-foot tall parking structure with seven levels of parking, three of which would be located below grade, one level at grade, and three levels above grade. A total of 700 parking spaces will be provided within the structure. The new parking structure will replace the 217-space Existing Parking Lot at the Project Site.

The Master Plan requires on-site parking ratios for the Property to be provided as follows:

- Medical Suites – 5 spaces per 1,000 square feet of gross floor area
- Diagnostic, Support, Computer Center, Emergency Room, MRI, and Administrative Space – 3 spaces per 1,000 square feet of gross floor area
- Rehabilitation Center/Organ Transplant – 2.5 spaces per bed

A minimum of 33% of the parking spaces will be reserved for short-term (e.g., visitor, outpatient and guest) parking. Secure, convenient bicycle, moped and motorcycle parking areas will be provided at a ratio of one space for twenty (20) automobile parking spaces provided for the Project.

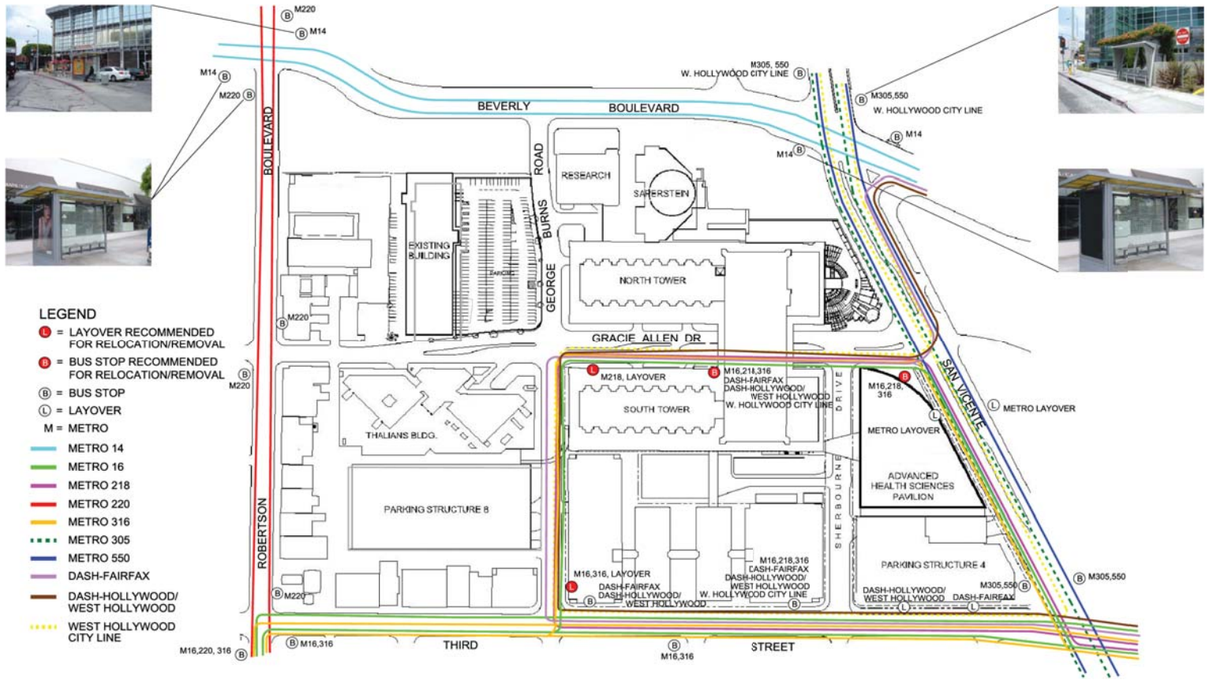
The Project includes construction of the parking structure with approximately 483 net new parking spaces that will be built for use by employees, staff, visitors and patients. After construction of the Project, there will be 97 more parking spaces on the CSMC Campus than the Master Plan requires (per LAMC requirements), as shown in *Table 32: Future CSMC Campus Parking Summary* in *Section IV.D: Transportation and Circulation*. The Original EIR analyzed construction of a 650-space parking structure, so the proposed Project consists of an additional 50 spaces within the new adjoining parking structure.

Transit access is readily available through the Metropolitan Transit Authority (the "Metro") bus service stops along adjacent roadways. CSMC has also prepared and executed a Covenant and Agreement with the City and Metro agreeing to provide an easement within the CSMC Campus for a portal to a Metro Rail station at the southwest corner of San Vicente Boulevard and Beverly Boulevard, provided that the easement does not adversely impact the operation of CSMC. *Figure 14: Transit Plan* shows the existing and proposed transit stops that serve the CSMC Campus.

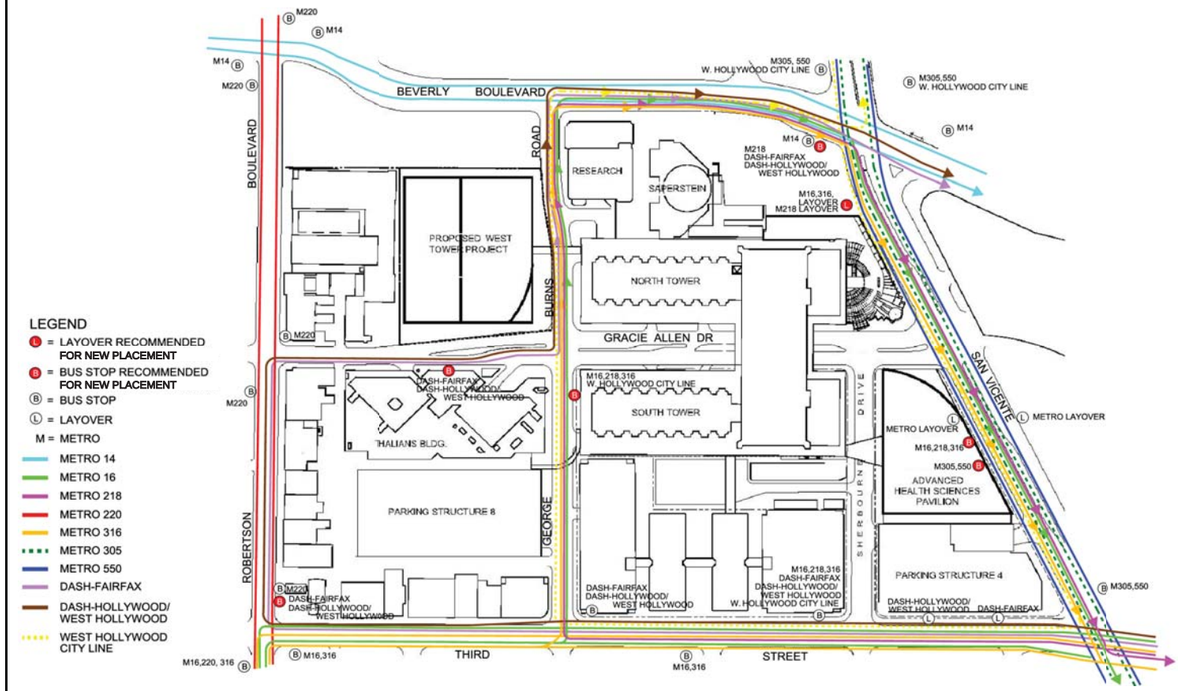
Project Landscaping/Lighting/Signage

The proposed landscaping is generally illustrated in *Figure 15: Conceptual Landscape Plan*. Though the Master Plan does not specify the number of square feet of landscaping required on the Property, it does require that all open areas not used for buildings, driveways, parking areas, recreational facilities, or walkways be attractively landscaped and irrigated.

The main entrance of the West Tower, fronting on George Burns Road, and the building perimeter would be landscaped in a manner consistent with the existing landscaping on the CSMC Campus. The landscaping plan proposes street trees along Gracie Allen Drive and along



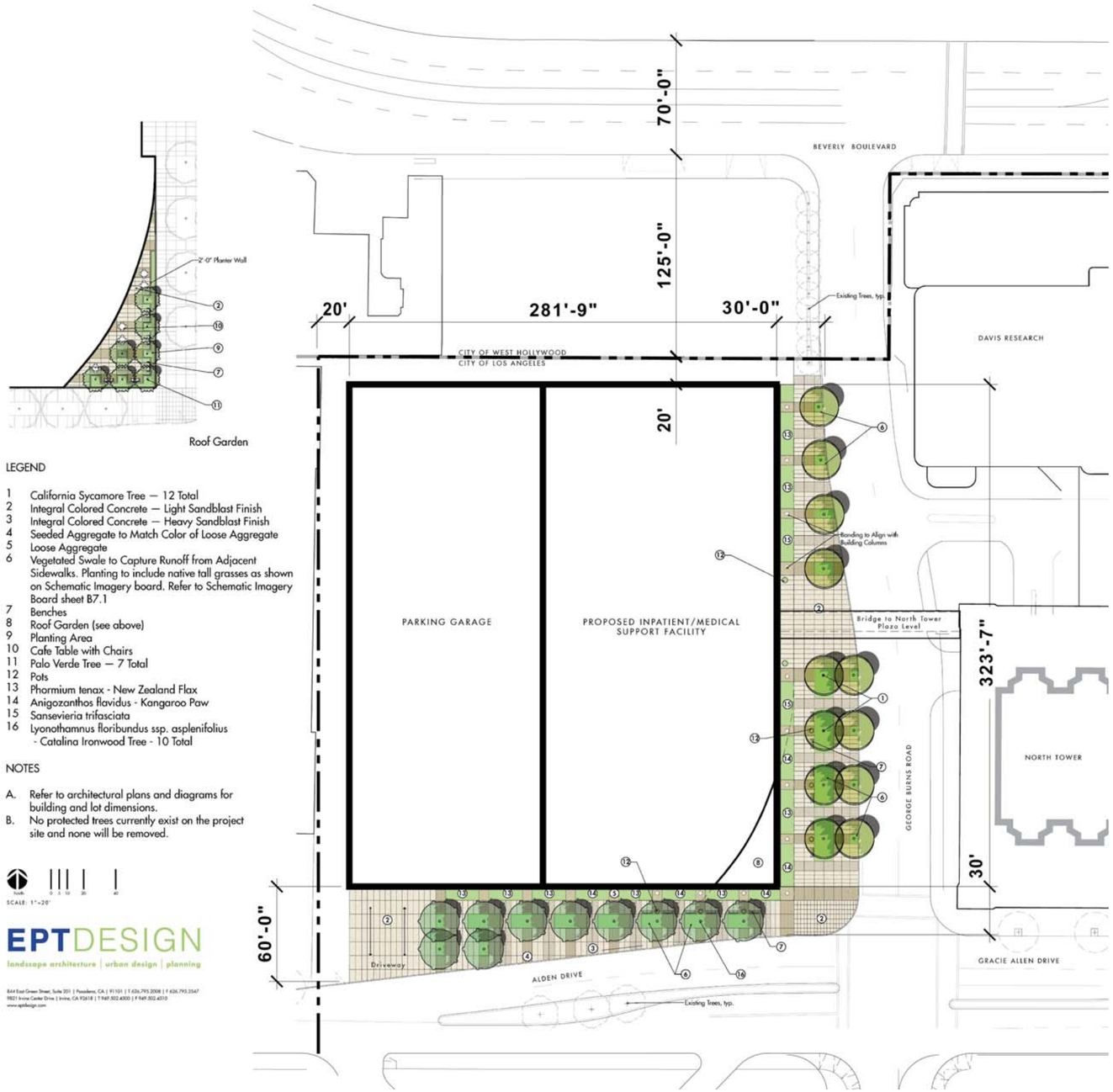
EXISTING PUBLIC TRANSIT ROUTES



RECOMMENDED PUBLIC TRANSIT ROUTES

FIGURE 14
TRANSIT PLAN

SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS



LEGEND

1 California Sycamore Tree — 12 Total
2 Integral Colored Concrete — Light Sandblast Finish
3 Integral Colored Concrete — Heavy Sandblast Finish
4 Seeded Aggregate to Match Color of Loose Aggregate
5 Loose Aggregate
6 Vegetated Swale to Capture Runoff from Adjacent Sidewalks. Planting to include native tall grasses as shown on Schematic Imagery board. Refer to Schematic Imagery Board sheet B7.1
7 Benches
8 Roof Garden (see above)
9 Planting Area
10 Cafe Table with Chairs
11 Palo Verde Tree — 7 Total
12 Pots
13 Phormium tenax - New Zealand Flax
14 Anigozanthos flavidus - Kangaroo Paw
15 Sansevieria trifasciata
16 Lyonothamnus floribundus ssp. asplenifolius - Catalina Ironwood Tree - 10 Total

NOTES

A. Refer to architectural plans and diagrams for building and lot dimensions.
B. No protected trees currently exist on the project site and none will be removed.

SCALE: 1"=20'

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FIGURE 15
CONCEPTUAL LANDSCAPE PLAN

SOURCE: HOK

George Burns Road in addition to planters and landscaping along those same streets. There will also be new colored concrete sidewalks on the east and south edges of the project area. A landscaped outdoor terrace plaza on Level Two is also proposed, which will contain colored concrete, planting areas, trees and seating areas.

All signs would be of an identifying or directional nature only and shall be arranged and located so as not to be a distraction to vehicular traffic. Animated or flashing signs are not proposed. Installation of lighting, signage and landscaping on the Project Site was analyzed in the Original EIR.

Project Utilities and Service Access

The Project Site is currently served by City of Los Angeles infrastructure, including sanitary sewer, water, and roadway. No unplanned expansion of infrastructure in the community is proposed.

Operational Characteristics

The operational characteristics of the Project will be similar to those operational characteristics currently observed by existing CSMC Campus operations. Employees, patients, visitors, deliveries and services accessing the site will be consistent with typical medical center hours and are addressed under the original Master Plan approval.

The Project design and operational characteristics incorporate Project Design Features ("PDFs")[5] that minimize or avoid adverse impacts. Because PDFs are already incorporated into the Project, they do not constitute mitigation measures, but nonetheless are credited toward reducing potential impacts. Typical examples of PDFs include urban stormwater runoff source controls, low impact development concepts, and treatment control best management practices ("BMPs") that reduce urban runoff and associated pollutants. In addition to the standard BMPs, the Project incorporates many "sustainable" or "green" strategies that target sustainable site development, water savings, energy efficiency, green-oriented materials selection, and improved indoor environmental quality. Project sustainable strategies include the following:

- The CSMC Campus, including the Project Site, is conveniently located with respect to public transit opportunities. Given the Project Site's location within an established urban area, access to a number of existing Los Angeles Metro bus lines is available, and a potential Metro Rail station at the northeast corner of the CSMC Campus may be available in the future, thereby reducing traffic, air quality, noise, and energy effects.

- 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.

[5] 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. The role of PDFs in the analysis for this SEIR is discussed in *Section IV: Environmental Impact Analysis* of this Draft SEIR.

- The West Tower design incorporates light-colored roofing and paving materials which serve to reduce unwanted heat absorption and minimize energy consumption.

- Exterior lighting associated with the West Tower is designed to reduce unwanted light spill, thereby minimizing nighttime illumination.

- Building materials and new equipment associated with the West Tower are selected to avoid materials that might incorporate atmosphere-damaging chemicals.

- The West Tower energy performance is designed to be 14% more effective than required by California Title 24 Energy Design Standards, thereby reducing energy use, air pollutant emissions and greenhouse gas emissions.

- The West Tower will generate 2.5% of the building's total energy use through on-site renewable energy sources. On-site renewable energy sources can include a combination of photovoltaic, wind, hydro, wave, tidal and bio-fuel based electrical production systems, as well as solar thermal and geothermal energy systems.

- At least 75% of all non-hazardous construction and demolition debris will be recycled and/or salvaged.

- The West Tower will use materials with recycled content such that the sum of post-consumer content plus one-half of the pre-consumer content constitutes at least 10% (based on cost) of the total value of the materials in the Project.

- Lighting systems within the West Tower will be controllable to achieve maximum efficiency (e.g., uniform general ambient lighting, augmented with individually controlled task lighting that accommodates user-adjustable lighting levels and automatic shutoff switching).

- The West Tower will be designed to provide occupant thermal comfort satisfaction levels above 85%.

- A Sustainable Building Education Program will be established in the West Tower, which will include a kiosk in the lobby and special tours of facilities focusing on the sustainable and green components.

Grading, Construction and Phasing

Although an exact construction schedule is not known at this time, pursuant to the existing Development Agreement and Master Plan, as proposed for amendment, the West Tower is anticipated to be operational by year 2023. Demolition and construction of the West Tower is anticipated to take approximately 36 months.

Three primary construction phases are anticipated: 1) demolition of existing development (i.e., Existing Building and Existing Parking Lot) at the Project Site; 2) excavation, grading and

preparation of the Project Site; and 3) construction of the West Tower and parking structure at the Project Site.

Demolition of the Existing Building and Existing Parking Lot will generate construction waste. During construction activities, the Applicant will recycle a considerable portion of demolition and construction materials, therefore reducing waste materials being transported to landfills serving the Project area. In order to minimize construction waste to be taken to landfills, the Applicant will require primary construction contractors to provide separate receptacles for materials that can be recycled such as wood scraps, metal scraps, and cardboard. Individual contractors will be required to emphasize diversion planning to ensure that the maximum amount of recyclable materials are separated and placed in the appropriate bins. Some of these materials may be temporarily stockpiled at the Project Site until they are either incorporated into the new construction and/or removed for off-site recycling.

Grading of the Project Site is expected to entail minor cuts and fills from the existing grades to establish the building pads and to provide surface drainage for the site. Soils are not expected to be imported to the Project Site; however, an estimated 64,000 cubic yards of earth materials excavation will be required.

Construction activities generating noise are limited to the hours between 7 A.M. and 6 P.M. from Monday through Friday and between 8 A.M. and 6 P.M. on Saturday. The City of Los Angeles Noise Control Ordinance (No. 144,331), which applies to construction activities being undertaken within 500 feet of a residential zone, prohibits noise that is "loud, unnecessary, and unusual, and substantially exceeds the noise customarily and necessarily attendant to the reasonable and efficient performance of work." Construction activities will be scheduled in compliance with City regulations.

Project Assumptions

The Project Description, and hence the analysis in this SEIR, 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*). Because the Project will include inpatient uses, the Office of Statewide Health Planning and Development ("OSHPD") will issue building and related permits. The Project will comply with all applicable statewide regulations. Also, this analysis assumes 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)).

Further, it is assumed that all of the adopted mitigation measures from the Original EIR (see *Appendix B: 1993 CSMC Master Plan EIR Summary Chart*) and required conditions of the Development Agreement (see *Appendix C: 1993 CSMC Development Agreement*) would be carried forward under the current Project, unless noted otherwise.

Other Project assumptions related to the analysis "baseline" and other Related (cumulative) Projects are discussed in *Section III: General Overview and Environmental Setting* of this Draft SEIR, and Project "net" and "credit" assumptions are discussed in *Section IV: Environmental Impact Analysis*.

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.

II. PROJECT DESCRIPTION

G. INTENDED USES OF THIS EIR

This Draft SEIR will be used by the City during its determination to grant permits and approvals as described in the preceding section. This Draft SEIR may also be used by Responsible Agencies during their determination to grant any necessary permits.

III. GENERAL OVERVIEW AND ENVIRONMENTAL SETTING

A. OVERVIEW OF THE ENVIRONMENTAL SETTING

1. GEOGRAPHIC SETTING AND ACCESS

The Project Site is located within the main CSMC Campus located in the Wilshire Community Plan (the "Community Plan") Area within the City of Los Angeles (the "City"). This area is approximately 13 miles west of downtown Los Angeles, nine miles east of the Pacific Ocean, adjacent to the south border of the City of West Hollywood and just east of the City of Beverly Hills (see *Figure 1: Regional Location*, provided in *Section II: Project Description*). The 24.1-net acre CSMC Campus is generally bounded by Beverly Boulevard on the north, San Vicente Boulevard on the east, Third Street on the south, and Robertson Boulevard on the west (see *Figure 2: Local Vicinity*, provided in *Section II: Project Description*). The Project Site, on which the West Tower will be constructed, comprises approximately two acres at the northwest corner of Gracie Allen Drive and George Burns Road.

Regional access to the CSMC Campus is provided by Interstate 10 (Santa Monica/Rosa Parks) Freeway, Interstate 405 (San Diego) Freeway and US 101 (Hollywood/Ventura) Freeway. Interstate 10 is approximately three miles south of the Project Site, Interstate 405 is approximately 4.4 miles west, and U.S. Highway 101 is approximately 5.4 miles northeast of the Project Site. Local access is provided via Robertson Boulevard, Third Street, Beverly Boulevard, and San Vicente Boulevard.

The Project Site is located on a relatively flat parcel that slopes (downgrade) gently to the southeast and is at an elevation of approximately 170 feet above sea level.

2. EXISTING DEVELOPMENT AND SURROUNDING LAND USES

Uses surrounding the CSMC Campus include medical buildings to the south, containing several CSMC programs and connected to, but not owned by, the Applicant; commercial and residential uses to the north, east, and west; and the City of West Hollywood border to the north (see *Figure 3: Aerial Overview and Surrounding Uses*, provided in *Section II: Project Description*). Specifically, the Project Site is currently occupied by the 90,000 square-foot Existing Building and the Existing Parking Lot. The Existing Building includes approximately 30,000 square feet of research space, 30,000 square feet of administrative space, and 30,000 square feet of medical suites. The adjacent Existing Parking Lot provides approximately 217 parking spaces.

The Beverly Center shopping complex is located to the east of the CSMC Campus across San Vicente Boulevard. A condominium tower and single-story retail buildings are located along Third Street, to the south of the Campus, as are medical buildings connected to the CSMC Campus by a bridge and containing several CSMC programs, but not owned by CSMC. Single-story retail buildings, restaurants and the multi-story Pacific Theatres office building are located to the west of the CSMC Campus. One- to three-story retail and office buildings are located along Beverly Boulevard, north of the Project Site. The City of West Hollywood borders the Project Site to the north.

The CSMC Campus is comprised of a collection of medical facility buildings on 24.1 net (approximately 26 gross) acres (see *Figure 5: Master Plan Site Plan*, provided in *Section II: Project Description).* The currently existing CSMC Campus includes approximately 1.86 million square feet of floor area for hospital and hospital-related uses, including approximately 1,545,014 square feet of hospital uses supporting 952 beds, approximately 122,826 square feet of administrative space, approximately 188,010 square feet of laboratory and research space, and 6,729 parking spaces[1] in surface parking lots and parking structures. An additional 396,000 square feet of hospital development, known as the Advanced Health Sciences Pavilion (the "Pavilion"), and 547 associated parking spaces will be constructed at the CSMC Campus beginning in the first quarter of 2009 at the southwest corner of Gracie Allen Drive and San Vicente Boulevard. Thus, for the purposes of this Draft SEIR, the existing CSMC Campus will be considered as inclusive of the Pavilion development, which will have been built by the start of construction for the proposed Project. With inclusion of the Pavilion, the existing CSMC Campus includes approximately 2.25 million square feet of floor area for hospital and hospital-related uses, including approximately 1,915,265 square feet of hospital uses supporting 952 beds, approximately 148,575 square feet of administrative space, approximately 188,010 square feet of laboratory and research space, and 7,275 parking spaces in surface parking lots and parking structures.

3. PHYSICAL SITE CHARACTERISTICS

The visual character of the Project Site and surrounding area is that of a fully developed urban commercial district, developed with a mix of medical, retail, commercial, and residential uses. Development along the major streets in the Project vicinity, including Beverly Boulevard, Third Street, La Cienega Boulevard, San Vicente Boulevard and Robertson Boulevard, is dominated by low-rise (one and two stories) and mid-rise (three to eleven stories) retail and commercial uses. Notable structures are the eight-story Beverly Center shopping mall, east of San Vicente Boulevard across from the CSMC Campus; the Pacific Design Center, with a nine-story building and a six-story building, located one-half mile north of the Project Site; the ten-story Sofitel Hotel, on the north side of Beverly Boulevard across from the Beverly Center; the 15-story CSMC Medical Office Towers along Third Street; an 11-story apartment complex at San Vicente Boulevard and Burton Way; and the 11-story Pacific Theatres office building west of the Project Site. Development away from major thoroughfares in the Project vicinity is dominated by low- and mid-rise residences. Residential development in the Project vicinity includes both single and multi-family residential development. Vegetation on the Project Site is limited to landscaping associated with the Existing Building and Existing Parking Lot. The visual character of the Project Site is described in greater detail in *Section IV.A: Aesthetics,* of this Draft SEIR.

The Project Site overlies a portion of the Salt Lake Oil Field. Oil is currently being extracted via slant drilling under the CSMC Campus from a portion of the oil field 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.

[1] Currently existing parking count excludes 166 parking spaces in Parking Lot 7 to be removed for construction of the Advanced Health Sciences Pavilion at the southwest corner of Gracie Allen Drive and San Vicente Boulevard.

East-west circulation in the Project area is provided by Santa Monica Boulevard and Beverly Boulevard to the north of the Project Site and Third Street and Wilshire Boulevard to the south of the Project Site. North-south circulation is provided by Robertson Boulevard to the west of the Project Site and San Vicente Boulevard, La Cienega Boulevard, and Fairfax Avenue to the east of the Project Site. The CSMC Campus internal circulation system, which provides access to on-site parking and medical facilities, includes: Alden Drive-Gracie Allen Drive, a continuous street which provides east-west access between Robertson Boulevard and San Vicente Boulevard; Sherbourne Drive, which provides north-south access between Third Street and Gracie Allen Drive; and George Burns Road, which provides north-south access between Third Street and Beverly Boulevard.

The Project area, being fully urbanized, is fully serviced for all public utilities and public services. Electricity and water at the Project Site are currently provided by the City of Los Angeles, Department of Water and Power (the "LADWP"). Natural gas at the Project Site is currently provided by the Southern California Gas Company (the "Gas Company"). The Project Site is located within the Hyperion Water Treatment Plant (the "HWTP") Service Area.

A comprehensive discussion of the setting and impacts for the issues listed below is found in Sections of this Draft EIR as follows:

Aesthetics	Section IV.A
Air Quality	Section IV.B
Noise	Section IV.C
Transportation and Circulation	Section IV.D
Cumulative Effects	Section IV.E

4. LAND USE AND PLANNING CONTEXT

The Project Site is located within the Wilshire Community Plan Area within the City of Los Angeles. The intent of the Wilshire Community Plan is to guide development and land use in the area. According to the Community Plan (update adopted September 19, 2001), the Project Site is located in the Beverly Center-Cedars Sinai Regional Commercial Center and is designated in the General Plan Framework Element and the Community Plan Land Use Diagram as a Regional Commercial Center. The Beverly Center-Cedars Sinai Regional Commercial Center is approximately 60 acres in size and is generally bounded by Beverly Boulevard on the north, Third Street on the south, La Cienega Boulevard on the east, and Robertson Boulevard on the west.

The Los Angeles General Plan Framework Element defines Regional Commercial Centers as typically high-density places whose physical form is substantially differentiated from the lower-density neighborhoods of the City. Generally, regional centers will range from FAR 1.5:1 to 6:1 and are characterized by six- to twenty-story (or higher) buildings as determined in the Community Plan.

III. GENERAL OVERVIEW AND ENVIRONMENTAL SETTING

B. RELATED PROJECTS

Section 15130 of the CEQA Guidelines requires that EIRs analyze cumulative impacts of a project. The analysis of cumulative impacts need not be as in-depth as what is provided relative to the proposed project, but rather is to "be guided by the standards of practicality and reasonableness." CEQA Guidelines Section 15355 further defines cumulative impacts as "two or more individual projects, which when considered together, are considerable or which compound or increase the environmental impacts."

Cumulative impacts are anticipated impacts of the Project along with foreseeable growth. The forecast of future conditions is clarified in Section 15130 of the CEQA Guidelines. Specifically, the CEQA Guidelines provide that foreseeable growth may be based on either of the following:

(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the [lead] agency, or

(B) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

The analysis of cumulative impacts may be based on an analysis of the geographical area that is relevant to a particular environmental issue. Hence, the cumulative study area may vary slightly depending on the issue under analysis. For example, a cumulative assessment of visual impacts will generally focus on the more immediate surrounding area, while traffic impacts may consider a broader range of roadways that may be used by the Project.

For purposes of the Project, a list of potential Related Projects which are generally representative of foreseeable growth was developed in coordination with the Los Angeles Department of Transportation ("LADOT") and the Planning Department. The Related Projects research was based on information on file on March 20, 2008 at the City of Los Angeles Departments of Planning and Transportation. The location of the Related Projects is shown in *Figure 16: Location of Related Projects*. The list of Related Projects in the Project area is presented in *Table 3: List of Related Projects*. The list of Related Projects was submitted to LADOT and the Planning Department staff for review and approval on March 20, 2008.

The Related Projects listed are considered, to the extent that they are appropriate and relevant in the context of incremental impacts of the Project, in the cumulative impact analysis of each environmental issue evaluated in this Draft SEIR.

FIGURE 16
LOCATION OF RELATED PROJECTS

TABLE 3
LIST OF RELATED PROJECTS [1]

MAP NO.	FILE PROJECT NUMBER	PROJECT NAME LOCATION	LAND USE	SIZE	STATUS
LA1	EAF 2000-3349	9051 W Pico Bl	Private School (Pre- K to 5th grade)	42,000 SF	Proposed
LA2	EAF 2001-4993	1016 S La Cienega Bl	Auto Body Shop	17,036 SF	Proposed
LA3	EAF 2004-1143	801 N Fairfax Av	Apartments	93 DU	Proposed
LA4	EAF 2004-1804	329 S La Cienega Bl	Private School	140 Students	Proposed
LA5	EAF 2004-5880	100 N La Cienega Bl	Condominiums Apartments High Turnover Restaurant Retail	62 DU 177 DU 38,739 SF 316,279 SF	Proposed
LA6	Park La Brea Apartment Addition EAF 2004-7359	6298 W 3rd St	Apartments	300 DU	Proposed
LA7	Wilshire Skyline 2003-CEN-463	6411 W Wilshire Bl	Retail Fast-Food Restaurant Apartments	29,060 SF 2,500 SF 130 DU	Proposed
LA8	Sunset Legacy Lofts	7950 W Sunset Bl	Condominiums Retail	183 DU 12,891 SF	Proposed
LA9	ENV2005-6605MN	8525 W Pico Bl	Apartments Retail	39 DU 11,327 SF	Proposed
LA10	TT-61512	1518 S Shenandoah St	Condominiums	16 DU	Proposed
LA11	ENV 2004-6237-MND	357 N Hayworth Ave	Condominiums	16 DU	Proposed
LA12	ZA-2005-749-ZAA	820 S Bedford St	Condominiums	12 DU	Proposed
LA13	ZA-2005-922-CU	603 N Fairfax Av	Hotel	17 Rooms	Proposed
LA14	ENV 2005-6481-EAF	428 S Willaman Dr	Condominiums	14 DU	Proposed
LA15	ENV 2005-4869-MND	600 S Ridgeley Dr	Condominiums	22 DU	Proposed
LA16	ZA 2005-6576-CUB	8108 W 3rd St	Restaurant	42 Seats	Proposed
LA17	VTT 64813	746 S Masselin Ave	Condominiums	60 DU	Proposed
LA18	VTT 63482	842 N Hayworth Ave	Condominiums	28 DU	Proposed
LA19	TT 64919	418 S Hamel Rd	Condominiums	8 DU	Proposed
LA20	TT 63481	111 S Croft Ave	Condominiums	10 DU	Proposed
LA21	TT 66142	751 S Curson Ave	Condominiums	10 DU	Proposed
LA22	EAF 1998-0305	6120 W Pico Bl	Retail	7,929 SF	Proposed
LA23	EAF 1995-0059	1461 S La Cienega Bl	Fast Food Restaurant w/ Drive-Thru	1,600 SF	Proposed
LA24	EAF 1995-0063	1742 S La Cienega Bl	Fast Food Restaurant w/ Drive-Thru	3,160 SF	Proposed
LA25	EAF 1995-0123	431 S Fairfax Av	Food Court	11,023 SF	Proposed
LA26		8305 W Sunset Bl	Retail Restaurant	2,972 SF 10,300 SF	Proposed
LA27	CPC 2004-1906-ZC-GPA-CU	111 S The Grove Dr	Self-storage facility	139,200 SF	Proposed
LA28	ZA 2005-9141-CUB	189 S The Grove Dr	Restaurant	150 Seats	Proposed
LA29	EAF 2003-1206	145 N La Brea Avenue	Shopping Center	18, 610 SF	Proposed

TABLE 3 (CONTINUED)
LIST OF RELATED PROJECTS [1]

MAP NO.	FILE PROJECT NUMBER	PROJECT NAME LOCATION	LAND USE	SIZE	STATUS
LA30		9760 W Pico Boulevard	Private School Addition	22,000 SF	Proposed
LA31		5500 W Wilshire Boulevard	Apartments	175 DU	Proposed
LA32		7600 W Beverly Boulevard	Museum	8,400 SF	Proposed
LA33		101 S La Brea Avenue	Condominiums Retail Restaurant	118 DU 26,400 SF 3,000 SF	Proposed
LA34	ENV2006-6209EA	725 S Curson Avenue	Office Restaurant	28,800 SF 800 SF	Proposed
LA35		5863 W 3rd Street	Apartments	60 DU	Proposed
LA36		5900 W Wilshire Boulevard	Office High Turnover Restaurant Restaurant	7,000 SF 3,500 SF 15,613 SF	Proposed
LA37		300 S Wetherly Drive	Condominiums	140 DU	Proposed
LA38		1042-1062 S Robertson Boulevard	School Expansion	38,240 SF	Proposed
LA39A		Cedars-Sinai Medical Center Advanced Health Sciences Pavilion	Medical Suites Hospital	121,100 SF 274,900 SF	Proposed
LA39B		Cedars-Sinai Medical Center (Remaining Entitled Development under Ordinance No. 168,847)	Medical Suites Hospital	87,900 SF 82,750 SF	Proposed
LA40	2004-CEN-1000	5600 W Wilshire Boulevard	Apartments Restaurant Retail	288 DU 4,000 GSF 8,500 GLSF	Proposed
LA41	2007-CEN-4579	375 N La Cienega Boulevard	Apartments Retail Retail	125 DU 22,300 GLSF (19,200 GLSF)	Proposed
BH1		8800 Burton Way	Office Retail Existing Office	11,700 SF 2,870 SF (1,260 SF)	Proposed
BH2		8800 W Wilshire Bl	Retail Office Existing Office	2,870 SF 11,700 SF (1,260 SF)	Proposed
BH3		9590 W Wilshire Bl	Condominiums Retail	60 DU 12,000 SF	Proposed
BH4		9200 W Wilshire Bl	Condominiums Retail/Restaurant	53 DU 14,000 SF	Proposed
BH5		8600 W Wilshire Bl	Condominiums Medical Office	21 DU 4,800 SF	Proposed
BH6		231 N Beverly Dr	Office/Entertainment	201,000 SF	Proposed
BH7		317-325 S Elm Dr	Condominiums Existing Condominiums	25 DU (8 DU)	Proposed
BH8		447 N Doheny Dr	Condominiums Existing Apartments	23 DU (16 DU)	Proposed
BH9		313-317 S Reeves Dr	Condominiums Existing Apartments	10 DU (4 DU)	Proposed
BH10		154-168 N La Peer Dr	Condominiums Existing Condominiums	16 DU (6 DU)	Proposed
BH11	Young Israel Synagogue	9261 Alden Dr	Sanctuary Multi-Purpose Room	14,811 SF 1,254 SF	Proposed

TABLE 3 (CONTINUED)
LIST OF RELATED PROJECTS [1]

MAP NO.	FILE PROJECT NUMBER	PROJECT NAME LOCATION	LAND USE	SIZE	STATUS
BH12	Beverly Hills Public Gardens/ Montage Hotel	202-240 N Beverly Dr	Hotel Condominiums Retail/Restaurants Public Garden	214 Rooms 25 DU 27,000 SF 33,279 SF	Proposed
BH13		265 N Beverly Dr	Office	41,500 SF	Proposed
BH14	Gagossian Gallery	456 N Camden Dr	Retail Expansion	1,750 SF	Proposed
BH15		257 N Canon Dr	Medical Office Surgery Center Retail	23,139 SF 13,609 SF 8,148 SF	Proposed
BH16		338 N Canon Dr	Retail	11,900 SF	Proposed
BH17		131-191 N Crescent Dr	Apartments Retail/Office	88 DU 40,000 SF	Proposed
BH18	Beverly Hills Cultural Center	469 N Crescent Dr	Cultural Center	34,000 SF	Proposed
BH19	Mercedes-Benz Service facility	400 Foothill Rd	Service Facility	53,000 SF	Proposed
BH20		50 N La Cienega Bl	Medical Office Existing Office	14,000 SF (14,000 SF)	Proposed
BH21	BMW	9001 Olympic Bl	New Car Dealer	39,700 SF	Proposed
BH22		326 N Rodeo Dr	Retail	4,550 SF	Proposed
BH23		8536 Wilshire Bl	Medical Office Retail	12,445 SF 12,445 SF	Proposed
BH24		8601 Wilshire Bl	Condominiums	37 DU	Proposed
BH25		8767 Wilshire Bl	Retail/Office	75,000 SF	Proposed
BH26		143-149 N Arnaz Dr	Condominiums	23 DU	Proposed
BH27		216-220 S Arnaz Dr	Condominiums	16 DU	Proposed
BH28		201 N Crescent Dr	Assisted Care Facility	80 DU	Proposed
BH29		155-157 N Hamilton Dr	Condominiums	11 DU	Proposed
BH30		225 S Hamilton Dr	Condominiums Existing Condominiums	27 DU (14 DU)	Proposed
BH31		140-144 S Oakhurst Dr	Condominiums	11 DU	Proposed
BH32		432 N Oakhurst Dr	Condominiums	34 DU	Proposed
BH33		450-460 N Palm Dr	Condominiums	38 DU	Proposed
BH34		437-443 N Palm Dr	Condominiums	13 DU	Proposed
BH35		146 Clark Dr	Retail Condominiums Existing Single-Family Home	500 SF 6 DU (1 DU)	Proposed
HB36		9844 Wilshire Boulevard	Commercial Existing Retail	95,000 SF (9,633 SF)	Proposed
BH37		9754 Wilshire Boulevard	Office Medical Office	24,566 SF 7,977 SF	Proposed
BH38		9876 Wilshire Boulevard	Residential Existing Non-Hotel Office Existing Hotel Support Existing Hotel	120 DU (13,030 SF) (1,804 SF) (47 Rooms)	Proposed
BH39		129 S. Linden Drive	Senior Congregation	76 DU	Proposed
BH40		9900 Wilshire Boulevard	Condominiums Retail Restaurant	252 DU 15,600 SF 4,800 SF	Proposed

TABLE 3 (CONTINUED)
LIST OF RELATED PROJECTS [1]

MAP NO.	FILE PROJECT NUMBER	PROJECT NAME LOCATION	LAND USE	SIZE	STATUS
WH1	TT-62042	928 N Croft Ave	Condominiums	12 DU	Proposed
WH2	ENV 2005-2427-CE	141 S Clark Dr	Condominiums	105 DU	Proposed
WH3	Beverly West Square Commercial Center TIS 1996-0923	Beverly Bl & Doheny Bl	Retail Center	94,000 SF	Proposed
WH4	Sunset Millennium Project TIS 1999-0722	La Cienega Bl & Sunset Bl	Hotel Retail/Restaurant Condominiums	296 Rooms 39,440 SF 189 DU	Proposed
WH5	DMP-004-026	8900 Beverly Bl	Retail Existing Condominiums	39,178 SF (8 DU)	Proposed
WH6	DVP-03-10	901 Hancock Ave	Retail Condominiums Restaurant	12,500 SF 40 DU 3,200 SF	Proposed
WH7	DVP-04-21	1351 Havenhurst Dr	Condominiums	12 DU	Proposed
WH8	DMP 004-013	1342 Hayworth Ave	Apartments Existing Apartments	16 DU (10 DU)	Proposed
WH9	CUP-005-012	723 Huntley Dr	Day Care Center	28 Children	Proposed
WH10	TTM-005-014	1248 Laurel Ave	Condominiums Existing Condominiums	16 DU (6 DU)	Proposed
WH11	TTM-005-024	1238 Larrabee St	Apartments Existing Apartments	15 DU (13 DU)	Proposed
WH12	DVP 04-26	1343 Laurel Ave	Senior Housing	35 DU	Proposed
WH13	TTM 006-001	1350 Hayworth Ave	Condominiums Existing Apartments	17 DU (16 DU)	Proposed
WH14	DMP 005-036	8580 Melrose Ave	Retail Existing Retail	9,995 SF (6,475 SF)	Proposed
WH15	DMP 005-035	8590 Melrose Ave	Retail Existing Retail	6,905 SF (3,523 SF)	Proposed
WH16	DMP-005-014	9061 Nemo St	Mixed-Use (Retail, Office, Condominiums)	9,990 SF	Proposed
WH17	DMP-005-004	923 Palm Ave	Condominiums Existing Condominiums	20 DU (8 DU)	Proposed
WH18	DMP-005-040	8120 Santa Monica Bl	Retail Condominiums	13,830 SF 28 DU	Proposed
WH19	DVP-004-002	8631 Santa Monica Bl	Retail	4,200 SF	Proposed
WH20	DVP-00-56	8788 Shoreham Dr	Condominiums	15 DU	Proposed
WH21	DMP-005-033	8760 Shoreham Dr	Condominiums Existing Single-Family Home	12 DU (1 DU)	Proposed
WH22	Mixed-Use Project DMP-006-008	9040 Sunset Bl	Retail/Restaurant/Office Condominiums Apartments	190,350 SF 61 DU 15 DU	Proposed
WH23	DMP-006-014	612 Westmont Dr	Retail Townhomes	2,900 SF 6DU	Proposed
WH24	DVP-004-018	612-616 Croft Avenue	Condominiums Existing Single-Family Home	11 DU (2 SF)	Proposed
WH25		1200 Alta loma Rd	Hotel Addition	40 Rooms	Proposed
WH26		8783 Bonner Dr	Retail	1,000 SF	Proposed
WH27		1042-1050 N Edinburgh Ave	Condominiums Existing Condominiums	18 DU (8 DU)	Proposed

TABLE 3 (CONTINUED)
LIST OF RELATED PROJECTS [1]

MAP NO.	FILE PROJECT NUMBER	PROJECT NAME LOCATION	LAND USE	SIZE	STATUS
WH28		1433 Havenhurst Dr	Apartments Existing Apartments	24 DU (3 DU)	Proposed
WH29		8465 Holloway Dr	Condominiums Hotel Restaurant	16 DU 20 Rooms 4,619 SF	Proposed
WH30		825 N Kings Rd	Condominiums Existing Single-Family Home	18 DU (1 DU)	Proposed
WH31		1136-1142 N La Cienega Bl	Condominiums Existing Condominiums	16 DU (2 DU)	Proposed
WH32		1037-1051 N Laurel Ave	Condominiums Existing Condominiums	16 DU (10 DU)	Proposed
WH33		8448 Melrose Ave	Retail	4,000 SF	Proposed
WH34		8525 Melrose Ave	Retail Existing Single-Family Home	9,206 SF (2 DU)	Proposed
WH35		8687 Melrose Ave	Office	400,000 SF	Proposed
WH36		8750 Melrose Ave	Medical Office	120,000 SF	Proposed
WH37	Melrose Triangle	9040-9098 Santa Monica Bl	Condominiums Retail Self-storage Facility Existing Retail	191 DU 71,000 SF 327,000 SF (90,000 SF)	Proposed
WH38		8121 Norton Ave	Condominiums Existing Single-Family Home	16 DU (3 DU)	Proposed
WH39		1220 N Orange Grove Ave	Condominiums Existing Single-Family Home	12 DU (1 DU)	Proposed
WH40		8474-8544 W. Sunset Boulevard	Retail/Restaurant Hotel Residential	39,440 SF 296 Rooms 189 DU	Proposed
WH41	Sunset Olive	8430 W Sunset Bl	Retail Condominiums	35,000 SF 138 DU	Proposed
WH42		8746 W Sunset Bl	Retail	2,323 SF	Proposed
WH43		8873 W Sunset Bl	Retail	9,995 SF	Proposed
WH44		8950-8970 W Sunset Bl	Hotel Condominiums	196 Rooms 4 DU	Proposed
WH45		9016 W Sunset Bl	Medical Office Existing Retail	107,900 SF (11,400 SF)	Proposed
WH46		841-851 Westmount Dr	Condominiums	16 DU	Proposed
WH47		310 N Huntley Dr	Private School	170 Student	Proposed
WH48	TTM 03-01	1146 Hacienda Place	Condominiums Existing Single-Family Home	10 DU (1 SF)	Proposed
WH49	TTM-006-003	1236 Harper Avenue	Condominiums	40 DU	Proposed
WH50	DMP-006-011	9001 Santa Monica Boulevard	Condominiums Retail Restaurant Five Existing Lots	42 DU	Proposed
WH51	DVP-005-059	914 Wetherly Drive	Apartments Condominiums Senior Housing Existing Single-Family Home	28 DU 2 DU 26 DU (2 SF)	Proposed
WH52	DVP-006-006	8969 Santa Monica Boulevard	Supermarket	65,325 SF	Proposed
WH53		8849 W. Sunset Boulevard	Retail	7,726 SF	Proposed
WH54		1140 N. Formosa Avenue	Condominiums	11 DU	Proposed

TABLE 3 (CONTINUED)
LIST OF RELATED PROJECTS [1]

MAP NO.	FILE PROJECT NUMBER	PROJECT NAME LOCATION	LAND USE	SIZE	STATUS
WH55		329 N. La Cienega Boulevard	Private School	140 Stds.	Proposed
WH56		9062 Nemo Street	Retail Condominiums	20,105 SF 4 DU	Proposed
WH57		365 N. San Vicente Boulevard	Condominiums Senior Housing	135 DU 42 DU	Proposed
WH58		8989 Santa Monica Boulevard	Commercial	70,000 SF	Proposed
WH59		8305 W. Sunset Boulevard	Retail Restaurant	2,972 SF 10,300 SF	Proposed

[1] Sources:
- City of Los Angeles Departments of Planning and Transportation
- City of Beverly Hills Planning and Community Development Department
- City of West Hollywood Planning and Community Development Department
- Draft Environmental Report, Volume 1, for 9900 Wilshire Project, prepared by Impact Sciences, Inc., August 2007
- Traffic Impact Study, Westfield Century City for New Century Plan, prepared by LLG Engineers, September 2007

III. GENERAL OVERVIEW AND ENVIRONMENTAL SETTING

C. PROJECT BASELINE

"Baseline" refers to the environmental setting conditions that establish the background against which a project is compared. The CEQA Guidelines Section 15125 establishes that a project's environmental baseline is typically established by the physical conditions that exist within the project area at the time the Lead Agency issues the NOP (i.e., at the beginning of the environmental review). However, the Lead Agency has some discretion in defining the baseline when supported by substantial evidence of the administrative record. For example, the Lead Agency may recognize a "credit" for conditions that may already exist but would be replaced by a project, or for conditions that may not actually exist (at the time of the project's environmental review) but have been previously approved, and in theory, could be undertaken without further discretionary permits.

The Project's baseline is established as a combination of the current existing physical conditions near the period of March 2008 and projected future conditions for Build-out Year 2023. For this SEIR analysis, the baseline is adjusted accordingly to account for the following factors:

1) Allowed uses under applicable permits and/or which could exist without further discretionary approval (i.e., the 170,650 square feet remainder Master Plan entitlement through the 1993 Zone Change, Height District Change and Development Agreement);

2) Uses which have previously existed (i.e., the 90,000 square-foot Existing Building to be demolished and incorporated into (i.e., credited to) the West Tower); and

3) Uses for which prior CEQA review has occurred (i.e., the 170,650 square feet residual Master Plan entitlement.

The role of each of the factors in defining an acceptable background "credit" for the Project and/or establishing the "net" incremental effect of the Project is discussed in *Section IV: Environmental Impact Analysis* of this Draft SEIR.

Further, it is assumed that all of the adopted mitigation measures from the Original EIR (see *Appendix B: Master Plan EIR Summary Chart*) and required conditions of the Development Agreement (see *Appendix C: 1993 CSMC Development Agreement*) would be carried forward under the current Project, unless noted otherwise.

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*.

IV. ENVIRONMENTAL IMPACT ANALYSIS

A. AESTHETICS

1. INTRODUCTION

Aesthetics, views, nighttime illumination, and daytime glare are related elements in the visual environment. *Aesthetics* generally refers to the identification of visual resources, the quality and character of what can be seen, and the overall visual perception of the environment. *View* refers to the visual access to important focal points or panoramic views from an area. *Nighttime illumination* addresses the extent to which a use's nighttime lighting (either interior or exterior) is visible from the surrounding area. *Glare* refers to the effect from reflective surfaces or lighting that may result in a safety or nuisance concern to drivers or surrounding uses.[1]

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Existing Visual Character

The Project Site is located in the Wilshire Community Plan Area of the City of Los Angeles and specifically within an area known as the Beverly Center-Cedars Sinai Regional Commercial Center. The visual character of the Project Site and surrounding area is that of a fully developed urban center, developed with a mix of medical, retail, commercial, and residential uses within the core and along roadway corridors leading to the center.

The major streets in the project vicinity include Beverly Boulevard, Third Street, La Cienega Boulevard, San Vicente Boulevard and Robertson Boulevard. Development along these streets is dominated by low-rise (one and two stories) and mid-rise (three to eleven stories) retail and commercial uses (see *Figure 3: Aerial Overview and Surrounding Uses*, in *Section II: Project Description*). The majority of commercial development fronting on the surrounding streets consists of low-rise buildings, and low-rise residential buildings dominate the nearby residential streets. 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 15-story CSMC Medical Office Towers along Third Street; an 11-story apartment complex at San Vicente Boulevard and Burton Way; and the 11-story Pacific Theaters building west of the Project Site. *Figure: 17: Views of Urban Character: San Vicente Boulevard/Third Street, Figure: 18: Views of Urban Character: Third Street/George Burns Road, Figure: 19: Views of Urban Character: Robertson Boulevard/Gracie Allen Drive-Alden Drive, Figure: 20: Views of Urban Character: Beverly Boulevard/Robertson Boulevard, Figure: 21: Views of Urban Character: Beverly Boulevard/San Vicente Boulevard*, and *Figure: 22: Views of Urban Character: San Vicente Boulevard/Gracie Allen Drive* demonstrate views which typify the surrounding urban character.

[1] City of Los Angeles, *L.A. CEQA Thresholds Guide* (Los Angeles: City of Los Angeles, 2006).

LOOKING NORTHWEST TOWARD CSMC CAMPUS

FIGURE 17
VIEWS OF URBAN CHARACTER: SAN VICENTE BOULEVARD/THIRD STREET

SOURCE: PLANNING ASSOCIATES, INC.

LOOKING NORTH TOWARD CSMC CAMPUS

FIGURE 18
VIEWS OF URBAN CHARACTER: THIRD STREET/GEORGE BURNS ROAD

SOURCE: PLANNING ASSOCIATES, INC.

LOOKING EAST TOWARD CSMC CAMPUS

FIGURE 19
VIEWS OF URBAN CHARACTER: ROBERTSON BOULEVARD/GRACIE ALLEN DRIVE-ALDEN DRIVE

SOURCE: PLANNING ASSOCIATES, INC.

LOOKING SOUTHEAST TOWARD CSMC CAMPUS

FIGURE 20
VIEWS OF URBAN CHARACTER: BEVERLY BOULEVARD/ROBERTSON BOULEVARD

SOURCE: PLANNING ASSOCIATES, INC.

LOOKING SOUTHWEST TOWARD CSMC CAMPUS

FIGURE 21
VIEWS OF URBAN CHARACTER: BEVERLY BOULEVARD/SAN VICENTE BOULEVARD

SOURCE: PLANNING ASSOCIATES, INC.

LOOKING WEST TOWARD CSMC CAMPUS

FIGURE 22
VIEWS OF URBAN CHARACTER: SAN VICENTE BOULEVARD/GRACIE ALLEN DRIVE

SOURCE: PLANNING ASSOCIATES, INC.

The CSMC Campus is currently developed with several medical tower and mid-rise structures accommodating approximately 1.7 million square feet of medical office, research, and hospital space. The CSMC Campus structures include two 172-foot tall inpatient towers (the North and South Towers), the 185-foot tall Professional Tower, the 185-foot tall Saperstein Critical Care Tower, the 77-foot high Thalians Community Health Center, and a 177-foot tall research building. The Project Site is currently developed with the two-story, 80-foot high existing building at 8723 Alden Drive (the "Existing Building") and a surface visitor parking lot.

(2) Existing Viewsheds

According to the Wilshire Community Plan, the Project Site is not located within an important scenic viewshed. Due to the local topography and intensity of development in this commercial center, the opportunities for long distance views are limited. In all directions, except to the north, the long-range visual horizon is obstructed (and dominated) by existing man-made features in the foreground. Views to the north include limited intermittent long-range views of portions of the Santa Monica Mountain range known as the Hollywood Hills, with foreground views dominated by existing urban development.

The primary views of the Project Site are generally from within the CSMC Campus, in the immediate area bounded by Gracie Allen Drive and George Burns Road. Views of the Project Site from Beverly Boulevard or Robertson Boulevard are blocked or partially obstructed by adjacent buildings. The Project Site may be visible from vantage points from the Hollywood Hills and taller structures in the vicinity.

(3) Night Lighting

The CSMC Campus is located in a densely developed urban area. Commercial development and traffic along Beverly Boulevard, San Vicente Boulevard, and La Cienega Boulevard provide the greatest sources of local illumination. A major source of nighttime illumination in the immediate Project vicinity is the Beverly Center, adjacent and east of the CSMC Campus, which generates lighting from parking structures, exterior building lighting, and vehicle headlights. The Sofitel Hotel, located on Beverly Boulevard and several retail shopping centers, located on La Cienega Boulevard east of the CSMC Campus, are also sources of nighttime illumination and vehicle headlights. The nearest residences to the Project Site are located approximately 400 feet to the north on Bonner Drive in the City of West Hollywood.

Current sources of illumination on the CSMC Campus include street lighting, interior building lighting, lighting in parking structures, and security lighting. Sources of illumination from the Project Site are not highly visible and are not projected off-site since most of the lighting is shielded by the incorporation of directional lighting and the obstruction caused by surrounding structures. Windows from the Existing Building are tinted, thereby reducing the amount of light escaping from the building. Nighttime traffic entering and exiting the CSMC Campus does not significantly contribute to the existing illumination of the area because visiting hours are limited in the late evening hours.

(4) Daytime Glare

Glare may be caused directly by intense illumination or indirectly from the reflection of light off building surfaces. The presence of glare is frequently a subjective issue; however, when glare is excessive, it can cause discomfort, reduction of visibility, and even momentary loss of vision. A common source of adverse glare includes buildings with exterior facades incorporating highly reflective glass or mirror-like surface materials, which can reflect light when the sun is at a low angle. To a minor extent, evening glare can also be a factor due to vehicle headlights reflecting off reflective surfaces at street level.

The Existing Building has a brick and stucco façade with non-reflective glass windows. Due to the composition of building materials, the low height of the building and the proximity to taller surrounding structures, the Existing Building is not a source of significant glare.

b. Regulatory and Policy Setting

(1) Wilshire Community Plan

Often spoken of as the "mid-city" section of Los Angeles, the majority of the Wilshire Community Plan (the "Community Plan") area consists of gently sloping plains located about 6 miles westerly of downtown Los Angeles and also abutting the Cities of Beverly Hills and West Hollywood. The Community Plan area has a pattern of low to medium density residential uses interspersed with areas of higher density uses, including regional commercial centers.

The Community Plan does not identify any significant visual and/or scenic resources within or immediately adjacent to the Project Site. However, the Community Plan does provide generalized urban design policies and standards to ensure that projects, public spaces and rights-of-way incorporate specific elements of good design. The Community Plan acknowledges that a community's identity can be enhanced by individual projects through improvements to the streetscape and landscaping in public spaces and rights-of-way. Urban Design policies in the Community Plan generally seek to:[2]

- Orient commercial structures toward the main commercial street where a parcel is located and avoid pedestrian/vehicular conflicts.

- Provide for massing, proportion and scale of all new buildings and remodels that is at a pedestrian scale.

- Provide articulated architecture (and/or landscaping) that offers variation and visual interest, and enhances the streetscape by providing continuity and avoiding opportunities for graffiti.

- Utilize building materials to provide relief to untreated portions of exterior building facades and avoid large sterile expanses of building walls that are out of harmony with the surrounding neighborhood.

[2] City of Los Angeles, *Wilshire Community Plan* (Los Angeles: City of Los Angeles, 2001), Chapter V.

- Design parking structures to be integrated with the design of the buildings they serve.

- Provide landscaping within surface parking areas.

- Provide appropriate exterior lighting to enhance pedestrian access and safety, while avoiding spillover on adjacent residential uses.

Generally, the Community Plan sets forth planning goals and objectives to maintain the community's visual character by: 1) improving the function, design and economic vitality of commercial areas; 2) preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance; and 3) improving the quality of the built environment through design guidelines, streetscape improvements, and other physical improvements which enhance the appearance of the community.

More specifically, the Community Plan includes the following objectives and policies addressing visual character in commercially designated areas:[3]

Objective 2-3: Enhance the visual appearance and appeal of commercial districts.

Policy 2-3.1: Improve streetscape identity and character through appropriate controls of signs, landscaping, and streetscape improvements; and require that new development be compatible with the scale of adjacent neighborhoods.

The Community Plan also includes Urban Design guidelines that address individual land uses as well as the overall community design. The design policies establish a minimum level of design required in private projects and recommendations for public space improvements. Urban design policies applicable to the Project Site include:

Site Planning. Structures shall be oriented toward the main commercial street where a parcel is located and avoid pedestrian/vehicular conflicts by:

- Minimize the number of driveways/curb cuts which provide access from Major and Secondary Highways.

- Maximize pedestrian oriented retail and commercial service uses along street grade level frontages along commercial boulevards.

- Provide front pedestrian entrances for businesses which front on main commercial streets, with building facades and uses designed to promote customer interest, such as outdoor restaurants, and inviting public way extensions.

[3] City of Los Angeles, *Wilshire Community Plan* (Los Angeles: City of Los Angeles, 2001), Chapter V, p. V-3.

- Prohibit driveway openings, or garage or parking lot entries in exterior frontage walls of buildings, or between frontage buildings, unless the Los Angeles Department of Transportation determines that driveways cannot be practically placed elsewhere.

- Encourage pedestrian-only walkway openings, or entries (require at least one ground floor pedestrian entry), in exterior frontage walls of buildings, or between frontage buildings to plazas or courtyards with outdoor dining, seating, water features, kiosks, paseos, open air vending, or craft display areas.

- Provide fully landscaped and maintained unused building setback areas, and strips between driveways and walkways which allow safe and inviting pedestrian access to the rear of properties.

- Provide speed bumps for driveways which parallel walkways, or which are longer than 50 linear feet.

- Provide underground new utility service, including Internet services.

- Screen all mechanical and electrical equipment from public view.

- Screen all rooftop equipment and building appurtenances from public view.

- Require the enclosure of trash areas behind buildings for all projects.

Pedestrian-Oriented Building Design. In Regional Commercial Centers, the mass, proportion and scale of all new buildings and remodels must encourage pedestrian orientation. The design of all proposed projects must be articulated to provide variation and visual interest, and must enhance the streetscape and preclude opportunities for criminal activity and graffiti. Building materials should provide relief to untreated portions of building facades. The purpose of these provisions is to ensure that a project does not result in large sterile expanses of blank building walls, is harmonious with the surrounding neighborhood, and creates a stable environment with a pleasant and desirable character. The following policies are suggested to address pedestrian orientation:[4]

- For building frontages, require the use of offset building masses, recessed pedestrian entries, articulations, and surface perforations, or porticoes. Also require transparent windows (non-reflective, non-tinted glass for maximum visibility from sidewalks into building interiors). Also require recessed doors, entryways or courtyards, decorative planters, pedestrian scale murals or public art, mosaic tiles, or other means of creating visual interest, to break up long, flat building facades and free-standing blank walls greater than ten feet wide.

- Require each new building to have a pedestrian-oriented ground floor, and maximize the building area devoted to ground level display windows and display cases, store front glass,

[4] City of Los Angeles, *Wilshire Community Plan* (Los Angeles: City of Los Angeles, 2001), Chapter V, p. V-4.

doors, windows and other transparent elements on front facades to afford pedestrian views into retail, office, and lobby space, and those building surfaces facing rear parking areas.

- Require each new building to have building frontage on the floor immediately above the ground floor to be differentiated from the ground floor by recessed windows, balconies, offset planes, awnings, or other architectural details, but on buildings with pedestrian walkway openings, require continuity of an architectural feature on the facade, to retain continuity of the building wall at the ground floor.

- Provide color, lighting, and surface texture accents and complementary building materials to building walls and facades, consistent with adjacent neighborhood architectural themes.

- Maximize the applications of architectural features and articulations to building facades.

- Locate surface and above-grade parking areas to the rear of buildings, with access driveways on side streets, or from rear streets where project buildings cover the majority of block areas.

- Integrate landscaping within pedestrian-friendly plazas, green space, pocket parks, and other open space compliments.

Parking Structures. Parking structures should be integrated with the design of buildings they serve through the following:[5]

- Design parking structure exteriors to match the style, materials, texture, and color of the main building(s).

- Landscape areas to screen parking structures and areas, which are not otherwise architecturally integrated with the main building(s).

- Utilize decorative walls and landscaping to buffer adjacent residential uses from parking structures.

Lighting.[6]

- Install on-site lighting along all pedestrian walkways and vehicular access ways.

- Shield and direct on-site lighting down onto driveways and walkways, away from adjacent residential uses.

Community Design and Landscaping. In addition to the establishment of Design Standards for individual projects, improvements to the streetscape and landscaping of public spaces, roadway medians, and other rights-of-way create an attractive and orderly public realm and contribute to

[5] City of Los Angeles, *Wilshire Community Plan* (Los Angeles: City of Los Angeles, 2001), Chapter V, p. V-5.
[6] *Ibid*.

the overall urban aesthetic of a community. It is the intent of these guidelines to improve the environment, both aesthetically and physically, as opportunities in the Wilshire Community Plan Area occur which involve public improvements or other public and/or private projects that affect public spaces and right-of-ways. Further, the Community Plan identifies the need to establish primary entry and individual commercial area identity improvements in the "Cedars Sinai-Beverly Center" vicinity on San Vicente Boulevard and Burton Way at the southern entry, and at Beverly Boulevard at the northern entry.

(2) Los Angeles Municipal Code

The Project Site is not subject to any special design or restricted height districts, except that the Project Site is within Height District 2, which permits structures up to six stories and 185 feet in height. Most properties surrounding the CSMC Campus are zoned Height District 1 with building height limits ranging between 45 and 75 feet.

As it pertains to this analysis, additional Los Angeles Municipal Code ("LAMC") requirements regulate such aspects of development as the design of parking facilities, and site plan design. Requirements regulating land use controls (that may, in turn, influence the visual character at the Project Site) were previously considered with past approvals for the CSMC Campus.

LAMC Sections 91.8101-F, 91.8904.1 and 91.1707-E, address graffiti removal and deterrence. Specifically, the first nine feet of exterior walls and doors, measured from grade, and all of any walls enclosing the property must be built and maintained with a graffiti-resistant finish consisting of either hard, smooth, impermeable surfaces such as ceramic tile, baked enamel or a renewable coating of an approved, anti-graffiti material or a combination of both. Additionally, portions of exterior non-glass walls may be covered with clinging vines, screened by oleander trees or similar vegetation capable of covering or screening entire walls up to the height of at least nine feet.

Also, the Project is subject to the City of Los Angles Zoning Code, Lighting Regulations, Chapter 9, Article 3, Section 93.0117, which limits reflective surface areas and the reflectivity of architectural materials used. Further, outdoor lighting shall be designed and installed with shielding, so that the light source cannot be seen from adjacent residential properties.

c. CSMC Campus Background and 1993 Approvals

The Original EIR considered the visual character (i.e., height, mass, architectural design and color) of the Master Plan development, and viewsheds. It was concluded that implementation of the Master Plan at the Project Site would change the visual character of development on the west side of George Burns Drive to that similar to the current visual character of Alden Drive-Gracie Allen Drive. The Master Plan anticipated that the architectural design for new buildings would incorporate architectural elements similar to the existing CSMC Campus medical towers and unify the visual character within the Property. It was determined that the Master Plan development would be consistent with the existing development patterns and character of the immediate area. Further, although the Master Plan development would increase the visibility of the Property relative to the surrounding area, due to the already limited viewing area of the

Project Site and context amongst existing urban development of similar heights, short-range views from surrounding uses would not be affected. Partial obstruction of views from uses at a greater distance (i.e., further than 1,000 feet) from the Project Site was determined to be likely and adverse, but not significant. Although significant impacts to visual character and viewsheds were not anticipated with the Master Plan development, mitigation measures were recommended to further reduce potential negative effects.

The Original EIR evaluated artificial light (nighttime illumination and glare) and natural light (shade and shadow) conditions. It was concluded that the approved Master Plan would provide additional sources of nighttime illumination from new security lighting, parking structure lighting, and interior building lighting. Further, it was determined that nighttime lighting from the proposed development on the Project Site would be visible to the existing CSMC, commercial development on Beverly Boulevard, and residences on Bonner Drive. Interior and exterior lighting from a structure at this location, as well as other Master Plan development, would increase the overall nighttime illumination of the project area; however, no significant impacts were anticipated to result because of the existing levels of ambient illumination that already occur in the vicinity. Nonetheless, measures to reduce any negative effects from the introduction of artificial lighting were recommended and adopted. Due to the location of affected residences with respect to the Project Site, and the with the implementation of the mitigation measures, development of the Master Plan was determined to result in a less than significant impact.

In addition, the 1993 Development Agreement (Section 3.2.g) required that CSMC contribute up to $40,000 towards an Urban Design Program for the area generally bounded by Robertson Boulevard, Beverly Boulevard, Third Street, and San Vicente Boulevard. The purpose of the Urban Design Program is to create a more pedestrian-oriented environment in the area and provide a program of unifying themes and implementation program.

3. ENVIRONMENTAL IMPACTS

a. Methodology

This analysis considers the overall visual effect anticipated with the net increase of 200,000 square feet of floor area for medical uses within an overall building development envelope (i.e., the West Tower) consisting of an approximate 460,650 square foot, 185 feet high, 11-story medical tower with attached 7-level parking structure. The new building will contain the 200,000 square feet requested in this application, along with the 90,000 square feet of floor area contained in the Existing Building and the 170,650 square feet of floor area remaining under the Master Plan. The floor area in the Existing Building and the remaining floor area under the Master Plan were both considered in the Original EIR and are used as the baseline against which the net Project change is compared.

b. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the project would have significant impact on aesthetics if it would cause any of the following conditions to occur:[7]

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 buildings within a state scenic highway;

c) Substantially degrade the existing visual character or quality of the site and its surroundings; or

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

Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following:

a) The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered, or demolished;

b) The amount of natural open space to be graded or developed;

c) The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc.;

d) The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;

e) The degree to which a proposed zone change would result in buildings that would detract from the existing style or image of the area due to density, height, bulk, setbacks, signage, or other physical elements;

f) The degree to which the project would contribute to the area's aesthetic value;

g) Applicable guidelines and regulations;

h) The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or the ocean);

[7] State of California, *California Environmental Quality Act: Guidelines*, http://ceres.ca.gov/topic/env_law/ceqa/guidelines (May 2008).

i) Whether the project affects views from a designated scenic highway, corridor, or parkway;

j) The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and

k) The extent to which the project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

l) The change in ambient illumination levels as a result of project sources; and

m) The extent to which project lighting would spill off the project site and effect adjacent light-sensitive areas.

c. Project Impacts

(1) Visual Character/Aesthetics

The Project proposes the addition of 100 new inpatient beds (equivalent to 200,000 square feet of floor area for medical uses and ancillary services). This additional square footage will be combined with the remaining 170,650 square feet of approved entitlement under the Master Plan and the 90,000 square feet contained in the Existing Building to permit construction of a new medical use facility (including the additional 100 inpatient beds proposed by the Project) referred to as the West Tower.

Implementation of the Project would result in the replacement of the 2-story, architecturally non-descript Existing Building and the adjacent Existing Parking Lot with an 11-story, modern-style medical tower. The Existing Building is neither historic nor part of a historic district and is not noted or valued for its visual character. Demolition of the Existing Building would not substantially alter the valued visual character or image of the immediate area from what was previously entitled for this site. As a result, the impact of eliminating existing structures on the Project Site would be less than significant.

The West Tower Project would be similar in size and mass to the existing North and South Towers on the CSMC Campus. The design of the new West Tower structure would incorporate many of the architectural elements of the existing CSMC Campus structures to enhance a unified campus design theme. *Figure 9: Proposed Building Section, Figure 10: Proposed Building Floor Plan 1, and Figure 11, Proposed Building Floor Plan 2* (in *Section II: Project Description*), show the proposed general configuration of the West Tower and attached parking structure. The West Tower facility will be 11 stories tall and up to 185 feet in height. The adjoining 35-foot tall parking structure garage will have a total of seven levels, three of which will be underground, one of which is at ground level and three of which are above-ground. The main entrance of the building would face George Burns Road. The West Tower will be connected via a pedestrian bridge (at Level 3) extending over George Burns Road to the existing inpatient buildings (North Tower) to the east. The bridge will allow inpatient services at the hospital to operate in a more efficient manner. Containing all inpatient care within a cohesive

core of inter-connected facilities will improve the efficiency of patient transfers and emergency room services, as well as convenience to doctors, staff, patients, and visitors.

No building or structure on the subject property shall exceed one hundred eighty five (185) feet in height above grade as defined by LAMC Sections 12.21.1-B.3a and b and as included in the existing zoning.

The West Tower façade will be treated with a combination of stone and glass as shown in *Figure 12: Proposed Building Perspectives: View from Gracie Allen Drive and Figure 13: Proposed Building Perspectives: View from Beverly Boulevard* in *Section II: Project Description.* Also, the Project will be designed in accordance with the LAMC Sections 91.8101-F, 91.8904.1 and 91.1707-E, addressing graffiti removal and deterrence. Specifically, the first nine feet of exterior walls and doors, measured from grade, and all of any walls enclosing the property will be built and maintained with a graffiti-resistant finish consisting of either hard, smooth, impermeable surfaces such as ceramic tile, baked enamel or a renewable coating of an approved, anti-graffiti material or a combination of both. Additionally, portions of exterior non-glass walls may be covered with clinging vines, screened by oleander trees or similar vegetation capable of covering or screening entire walls up to the height of at least nine feet, and will be coordinated through the Landscape Plan.

A pedestrian bridge over George Burns Road would visually link the development on both sides of the street. As with the currently entitled buildings on the Project Site, the new development would help unify the visual character of the CSMC Campus and would be consistent with the existing style and image of the area. Because the Project is complementary to the existing and intended visual character of the CSMC Campus, and the Project's architectural design is attractive and compatible with development in the surrounding area, the Project's impact to the area's aesthetic value and image would be less than significant.

During construction activities for the Project, the visual character of the Project Site will reflect short-term changes as some of the construction activities will be visible from adjacent land uses. As the majority of the demolition and construction will be located internal to the CSMC Campus, much of the construction activities will be screened by existing structures on-site. However, construction security fencing, noise barriers, and staging areas may be located closer to the Project Site edges and therefore more visible during the short-term construction phase.

During construction, equipment and materials would be stored on-site, and temporary facilities (such as construction trailers, staging sites and portable toilets) would be stored on-site but screened by temporary construction fencing. Because of the ongoing CSMC uses, it is anticipated that efforts will be made to continue to present an attractive community presence throughout the duration of the construction activities, and that to enhance safety concerns, construction areas will be clearly partitioned and visually segregated from public areas.

Although construction-related structures and activities would create a notable change to the visual character, these changes would extend only for the duration of the construction activities (approximately 36 months). Following the completion of construction, the CSMC Campus would resume a visual character similar to what currently exists.

Compared to the Original EIR, which concluded that the Master Plan would have an adverse impact by moderately increasing the visibility of the CSMC Campus relative to the surrounding area due to the increased density of development and increased visual prominence, the net incremental impact of the Project would be insignificant and the overall impact is similar to that already analyzed in the Original EIR.

(2) Viewsheds

Implementation of the Project would increase visibility of development at the Project Site. The two-story Existing Building, which is relatively obscured from view by the surrounding development, would be replaced with an 11-story structure that would be taller than some of the surrounding development off the CSMC Campus.

Under the Master Plan, a 127,500 square-foot building was proposed and approved for the Project Site. It was anticipated that the previously approved development under the Master Plan would be comprised of a 10-story above grade complex, including a pedestrian bridge over George Burns Road. The proposed West Tower would increase the building footprint and massing beyond the initial approval by incorporating one additional story (for a total of 11 stories) and replacing the Existing Building with a parking structure (up to 4 levels above grade). The overall building massing of the West Tower would be wider and more rectangular to accommodate the increase in square footage (up to 460,650 square feet) in the West Tower. However, overall, the West Tower will generally be of similar height, massing, location and orientation to the development that was previously approved under the Master Plan. Moreover, the proposed parking structure will contain one less underground level than analyzed in the Original EIR. *Figure 12: Proposed Building Perspectives: View from Gracie Allen Drive and Figure 13: Proposed Building Perspectives: View from Beverly Boulevard* in *Section II: Project Description*, demonstrate the scale of the Project in the context of other development on the CSMC Campus.

Even with an increase in building height and massing, visibility of the West Tower from surrounding areas would be limited due to obstruction of views from the surrounding existing development. *Figure: 23: Views of Project Site: Southeast Corner of George Burns Road/Gracie Allen Drive, Figure: 24: Views of Project Site: South of Beverly Boulevard on George Burns Road,* and *Figure: 25: Views of Project Site: East of Robertson Boulevard on Gracie Allen Drive*, shows viewsheds toward the Project Site and demonstrate the context of the urban development in the Project area. With the development of the Project, the upper stories of the new structure would be visible from the more outlying areas, such as the intersection of Robertson Boulevard and Beverly Boulevard (see *Figure 20: Views of Urban Character: Beverly Boulevard/Robertson Boulevard*).

Figure 23: Views of Project Site: Southeast Corner of George Burns Road/Gracie Allen Drive demonstrates the view looking northwest from the intersection of Gracie Allen Drive and George Burns Road. Views of the existing surface parking lot and the Existing Building are found in the foreground with limited views of the Hollywood Hills in the background. With the development of the Project, the new structure would be prominent in the foreground and obscure some of the already limited background views.

LOOKING NORTHWEST TOWARD PROJECT SITE

FIGURE 23
VIEWS OF PROJECT SITE: SOUTHEAST CORNER OF GEORGE BURNS ROAD/GRACIE ALLEN DRIVE

SOURCE: PLANNING ASSOCIATES, INC.

LOOKING SOUTHWEST TOWARD PROJECT SITE

FIGURE 24
VIEWS OF PROJECT SITE: SOUTH OF BEVERLY BOULEVARD ON GEORGE BURNS ROAD

SOURCE: PLANNING ASSOCIATES, INC.

LOOKING NORTHEAST TOWARD PROJECT SITE

FIGURE 25
VIEWS OF PROJECT SITE: EAST OF ROBERTSON BOULEVARD ON GRACIE ALLEN DRIVE

SOURCE: PLANNING ASSOCIATES, INC.

Figure 19: Views of Urban Character: Robertson Boulevard/Gracie Allen Drive-Alden Drive shows the view looking east, generally from the intersection of Robertson Boulevard and Gracie Allen Drive. Views of the foreground and background are limited to the existing buildings along Robertson Boulevard. With the development of the Project, the upper stories of the new structure would be visible from this vantage point.

The height and massing of the Project would be consistent with the adjacent CSMC Campus North and South Towers. As the Project would incorporate many of the architectural elements of the existing CSMC Campus structures, the Project would appear as a continuation of existing background features. Overall views from surrounding areas would not be significantly impacted due to the existing development surrounding the Project Site, which already obscures or limits views to and from the Project Site. Although the immediate views of the Project Site would be of the intensified development, the West Tower would be visually consistent with the surrounding CSMC structures. Therefore, less than significant impacts to existing viewsheds are expected.

Compared to the Original EIR, which concluded that the Master Plan would have a less than significant effect on short-range views/viewsheds because existing adjacent structures already block views, and a moderately adverse impact on longer-range views from more distant vantage points because of the overall increased visual prominence, the net incremental impact of the Project would be insignificant and the overall impact is similar to that already analyzed in the Original EIR.

(3) Nighttime Illumination

The Project would provide additional sources of nighttime illumination with security lighting, parking structure lighting, and interior building lighting. Project lighting would be similar to that of the existing buildings and parking structures within the CSMC Campus and will be designed to minimize any adverse impacts. The West Tower would incorporate tinted exterior windows, which would reduce the intensity of the lighting visible to the surrounding area. All new exterior lighting would be directed downward for illumination on-site and shielded to minimize light spillover for areas off-site.

Night lighting from the West Tower would be visible at adjacent CSMC Campus structures and from commercial development along Beverly Boulevard. Lighting from the Project would not significantly impact commercial development on Beverly Boulevard as the street is already brightly lit at night. Lighting of the upper building levels may be visible to residences on Bonner Drive and residential areas outside of the immediate surrounding area that may have views toward the Beverly Center-Cedars Sinai Commercial Center. Nonetheless, the Project would not significantly impact residences on Bonner Drive and other outlying areas due to the distance of these areas from the CSMC Campus and the cumulative illumination effect from the intervening commercial development on Beverly Boulevard (i.e., the incremental effect of additional lighting due to the Project would be negligible at these distances). Therefore, no significant adverse illumination impacts are expected to occur.

Compared to the Original EIR, which concluded that the Master Plan would result in an increase in nighttime lighting that would be visible but insignificant to nearby residences, the net incremental impact of the Project would be insignificant and the overall impact is similar to that already analyzed in the Original EIR.

(4) Daytime Glare

The West Tower façade will be treated with a combination of stone and glass. The surface area of the lower levels of the West Tower would be broken up by entrances, landscaping and architectural detailing, thereby minimizing the potential for glare from surfaces at street level. The upper stories of the West Tower would be treated with reduced-reflective glass surfaces that minimize the potential for glare from early morning or late afternoon sun. Compliance with the LAMC Section 93.0117 (reflective materials design standards), which limit reflective surface areas and the reflectivity of architectural materials used, would reduce any adverse impact for building material glare. Implementation of the Project would not produce glare that would create a visual nuisance and, therefore, would not result in a significant impact.

The Original EIR did not specifically address daytime glare from building surfaces. However, compared to the Master Plan project, the net change in Project conditions that might affect glare is negligible. Further, as concluded in the analysis above, implementation of the Project would result in an insignificant impact because it would not produce glare that would create a visual nuisance.

(5) Consistency with Adopted Plans and Policies

The Community Plan designates the Project Site as a Regional Commercial land use. The Project is consistent with the Community Plan, in part due to the fact that the CSMC has long been recognized by the community as an established use in this area. Further, the Project is consistent because it furthers the Urban Design policies and guideline identified above (i.e., as through physical site improvements) and indirectly supports those policies by not creating obstacles for their realization (i.e., such as gateway identification for the Beverly Center-Cedars Sinai Regional Commercial Center area). The Project implements many of the site planning, building height, pedestrian-orientation, parking structure design, lighting and landscaping guidelines identified in the Urban Design section of the Community Plan. Pedestrian-orientation is also addressed in detail in *Section IV.D: Transportation and Circulation* of this Draft SEIR. The Project would result in a less than significant impact to aesthetic-related and urban design consistency and compatibility issues in the project area as demonstrated by the Project's consistency with applicable policies and programs of the Community Plan.

The Original EIR did not specifically address consistency with aesthetic-related and urban design policies and guidelines. However, as noted above, the 1993 Development Agreement (Section 3.2.g) required that CSMC contribute up to $40,000 towards an Urban Design Program for the area generally bounded by Robertson Boulevard, Beverly Boulevard, Third Street, and San Vicente Boulevard. The purpose of the Urban Design Program is to create a more pedestrian-oriented environment in the area and provide a program of unifying themes and implementation program. Compared to the Master Plan project, the net change in Project conditions that might

affect consistency is negligible. Further, as concluded in the analysis above, implementation of the Project would result in an insignificant impact because it complies with applicable urban design guidelines.

d. Cumulative Impacts

Development of the Related Projects would incrementally increase the intensity and urbanization of the Project area. As required by the Cities of Los Angeles, Beverly Hills and West Hollywood, the project design must be reviewed by the Los Angeles City Department of Planning for consistency with applicable Los Angeles codes and regulations prior to final plan approval.

(1) Visual Character

Impacts to aesthetics are generally site specific and localized. As discussed above, the Project is anticipated to result in a less than significant aesthetic impact to the visual character along all Property frontages. The Project is located within an urban center that is dominated by dense commercial development and low and mid-rise structures. With the exception of the proposed Beverly Connection (a 240-unit condominium/apartment and retail project) to be located approximately ¼ mile east of the Project Site on La Cienega Boulevard near Beverly Boulevard (EAF 2004-5880), none of the Related Projects are located within the immediate Project area. The Beverly Connection would be constructed consistent with the Community Plan standards and the proposed use is consistent with the surrounding area. Development of the Project in conjunction with the Related Projects would result in redevelopment or infilling of residential and commercial land uses throughout the community. As a result, the Project would not contribute to a potential cumulative impact to visual character in the project vicinity. Furthermore, a separate, site-specific environmental analysis will be prepared for Related Projects to determine and, if necessary, mitigate Related Project-specific potential impacts to visual character. Therefore, cumulative visual character impacts of Related Projects are considered to be less than significant.

(2) Alteration of Views

Although aesthetic impacts are generally site specific to the local setting, impacts that may affect panoramic viewsheds or recognized visual resources can have an effect on a broader area. As discussed above, the Project is anticipated to result in a less than significant impact to views from surrounding development. With the exception of a few Related Projects that would exceed six stories in height, the majority of the Related Projects would not be at a scale or height to impact views. The proposed 240-unit condominium/apartment and retail Beverly Connection project at La Cienega Boulevard and Beverly Boulevard, the proposed 296-room Sunset Millennium Hotel at La Cienega Boulevard and Sunset Boulevard, and the proposed 214-room Montage Hotel at Beverly Drive and Wilshire Boulevard would be larger-scale developments, of a height and mass that would be visible components of the skyline, and each may affect views in their immediate surrounding area. These Related Projects are each located approximately ½ mile from each other and are not closely concentrated in a single area. There are no viewpoints in which the Project and the Beverly Connection are visible in the foreground; both sites are only

visible from viewpoints where they are part of the background. The Montage Hotel and the Sunset Millennium projects are each more than ½ mile from the Project Site. Therefore, these projects are not anticipated to have a significant cumulative impact to views within the Project area. The Project would not contribute to a potential cumulative impact to views or viewsheds in the Project vicinity. Furthermore, a separate, site-specific environmental analysis will be prepared for Related Projects to determine and, if necessary, mitigate Related Project-specific potential impacts to aesthetics. Therefore, cumulative impacts related to viewsheds affected by Related Projects are considered to be less than significant.

(3) Lighting and Glare

Build-out of Related Projects in the Project area will contribute to the overall levels of nighttime illumination and glare in the Wilshire Community, as well as in the surrounding communities of Beverly Hills and West Hollywood. Nighttime illumination would cumulatively increase with these developments; however, the Related Projects are located within and spread throughout a highly urbanized area with a high degree of existing nighttime illumination. The additional glow from these projects is considered negligible and not cumulatively considerable, based on comparison to the existing conditions for the densely developed area. Glare and direct lighting are site-specific concerns that would be addressed through the separate, site-specific environmental analysis prepared for each Related Project and, if necessary, mitigated appropriately. Further, the Project and the Related Projects are subject to the LAMC Section 93.0117 reflective materials design standards, which limit reflective surface areas and materials that could contribute to glare. Thus, potential glare created from these Related Projects is not cumulatively considerable. Such mitigation would contribute to the reduction of nighttime illumination as well. Because the Project would not contribute significantly toward increased nighttime lighting levels in the immediate area, its cumulative contribution to lighting is considered to be less than significant.

4. MITIGATION PROGRAM

a. Regulatory Requirements, Standard Conditions, and Project Design Features

MM AES-1: As required by LAMC Section 12.40, the site will be required to prepare a Landscape Plan which will address replacement of removed trees.

MM AES-2: The owners shall maintain the subject property clean and free of debris and rubbish and to promptly remove any graffiti from the walls, pursuant to LAMC Sections 91.8101 and 91.8904.

MM AES-3: The Project is subject to the City of Los Angles Zoning Code, Lighting Regulations, Chapter 9, Article 3, Section 93.0117, which limits reflective surface areas and the reflectivity of architectural materials used.

MM AES-4: Outdoor lighting shall be designed and installed with shielding, so that the light source cannot be seen from adjacent residential properties.

b. 1993 Mitigation Measures (Carried Forward)

MM AES-5: All open areas not used for the building, driveways, walls, or similar features shall be attractively landscaped in accordance with a landscape plan prepared by a licensed landscape architect and approved by the appropriate agencies. All landscaped areas shall be maintained in a first class condition at all times.

MM AES-6: The landscaped area along the property borders shall include trees spaced a minimum of 15 feet apart, measured from the center of each tree. Trees should be no less than 24-inch-boxes in size.

MM AES-7: Rooftop structures should be screened from view and utilities should be installed underground, where feasible.

MM AES-8: The project should avoid the inclusion of large, blank walls.

MM AES-9: Connection between the parking structures and the medical facilities should be physically integrated to provide a non-hazardous and aesthetically pleasing pedestrian entry into the main building.

MM AES-10: After obtaining project permit approval, the Applicant shall submit final site plans and elevations to the Department of City Planning prior to the issuance of a Building Permit. The Department of City Planning shall compare the final plans with those approved by the City Planning Commission. If the Department of City Planning determines that the final site plans or elevations contain substantial changes, the applicant shall submit the final plans to the City Planning Commission for review and approval.

MM AES-11: All lighting shall be designed and placed in accordance with applicable Bureau of Engineering and Department of Public Works requirements.

MM AES-12: Provision shall be made to include exterior parking structure walls to shield direct glare from automobile headlights into residential areas.

MM AES-13: All outdoor lighting, other than signs, should be limited to that required for safety, securing, highlighting, and landscaping.

MM AES-14: Low level security lighting should be used in outdoor areas.

MM AES-15: Security lighting, as well as both outdoor lighting and indoor parking structure lighting, should be shielded such that the light source will not be visible from off-site locations.

MM AES-16: Lighting should be directed on site and light sources shall be shielded so as to minimize visibility from surrounding properties.

MM AES-17: Exterior windows should be tinted or contain an interior light-reflective film to reduce visible illumination levels from the building.

MM AES-18: Per the 1993 Development Agreement (Section 3.2.g), CSMC must contribute up to $40,000 towards an Urban Design Program for the area generally bounded by Robertson Boulevard, Beverly Boulevard, Third Street, and San Vicente Boulevard. The purpose of the Urban Design Program is to create a more pedestrian-oriented environment in the area and provide a program of unifying themes and implementation program.

c. Recommended Modified and Additional Mitigation Measures

No other mitigation measures are required as adherence to existing regulations, previously required mitigation measures, and the current Project design would already reduce all impacts to less than significant levels.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of the standard conditions of approval, project design features, and previously adopted mitigation measures (listed above) would reduce all aesthetic impacts to less than significant levels. Project implementation would result in less than significant impacts related to visual character, viewsheds, nighttime lighting and glare. Construction impacts would be short-term and would not be significant. No additional mitigation measures are introduced in this SEIR as impacts related to aesthetics are already reduced to less than significant levels.

Compared to the Original EIR, which concluded that development of the Master Plan would add adverse impacts by increasing the visibility of the CSMC Campus and no significant impact on views or nighttime light due to existing ambient conditions, the net incremental impact of the Project would be insignificant and the overall impact is similar to that already addressed in the Original EIR, which was reduced to less than significant with implementation of the adopted mitigation measures.

IV. ENVIRONMENTAL IMPACT ANALYSIS

B. AIR QUALITY

1. INTRODUCTION

The following analysis of air quality impacts is based primarily upon the *Cedars-Sinai Medical Center Project Air Quality and Noise Impact Report*, prepared by Terry A. Hayes Associates and dated August 2008, and which is incorporated herein. The air quality report, including the applicable calculation sheets are provided in *Appendix D: Air Quality & Noise Impact Report* of this Draft SEIR. In addition, the analysis includes conclusions of the air quality environment regarding air quality impacts that were reached in the Original EIR, as appropriate.

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Air Quality Terms and Characteristics

There are three sources of air pollutants, including mobile sources (on- and off-road motor vehicles), area sources (e.g., water heaters, natural gas consumption, and consumer products), and stationary sources (e.g., industrial and manufacturing processes, boilers, under-fired broilers used in restaurants, and emergency generators). These sources and their pollutants are discussed below.

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards or criteria for outdoor concentrations to protect public health. The federal criteria pollutants include carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), particulate matter ten microns or less in diameter (PM_{10}), and lead (Pb). The State criteria pollutants include the seven federal criteria pollutants and, in addition, sulfates, hydrogen sulfide, visibility-reducing particles, and vinyl chloride. The federal and state standards have been set at levels above which concentrations may be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. These pollutants are discussed below. Background information for these pollutants was obtained from the South Coast Air Quality Management District ("SCAQMD") *CEQA Air Quality Handbook*.[1]

Carbon Monoxide. CO is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas such as the Project location, motor vehicle exhaust accounts for the majority of CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO

[1]South Coast Air Quality Management District (SCAQMD), *CEQA Air Quality Handbook* (Diamond Bar: SCAQMD 1993).

from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February.[2] The highest levels of CO typically occur during the colder months of the year when inversion conditions are more frequent. In terms of health, CO competes with oxygen, often replacing it in the blood, thus reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can be dizziness, fatigue, and impairment of central nervous system functions.

Ozone. O_3 is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG), also referred to as volatile organic compounds (VOC), and nitrogen oxides (NO_X) react in the presence of ultraviolet sunlight. O_3 is not a primary pollutant; it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO_X emissions, which are the components of O_3, are motor vehicle exhaust and industrial sources. Meteorology and terrain also play major roles in O_3 formation. Ideal conditions for ozone formation occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. Motor vehicle emissions are the greatest source of O_3-producing gases.

Exposure to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

Nitrogen Dioxide. NO_2, like O_3, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. The primary source of NO emissions is the combustion of fossil fuel. NO and NO_2 are collectively referred to as NO_X and are major contributors to O_3 formation. NO_2 also contributes to the formation of PM_{10}. High concentrations of NO_2 can cause breathing difficulties and result in a brownish red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO_2 and chronic pulmonary fibrosis. Some increase of bronchitis in children (two and three years old) has also been observed at concentrations below 0.3 parts per million ("ppm").

Sulfur Dioxide. SO_2 is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Currently, the main sources of SO_2 emissions are coal and oil used in power plants and industries. Generally, the highest levels of SO_2 are found near large industrial complexes such as power plants. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 as well as limits on the sulfur content of fuels. SO_2 is an irritant gas that attacks the throat and lungs causing acute respiratory symptoms and diminished ventilator function. SO_2 can also yellow plant leaves and erode iron and steel.

Particulate Matter. Particulate matter pollution consists of very small liquid and solid particles floating in the air. Naturally occurring particulate matter can include smoke, soot, dust, and salts. Particulate matter also forms when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. $PM_{2.5}$ and PM_{10} represent fractions of particulate

[2] "Inversion" is an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air.

matter. Fine particulate matter, or $PM_{2.5}$, is roughly 1/28 the diameter of a human hair. $PM_{2.5}$ results from fuel combustion (e.g. motor vehicles, power generation, and industrial facilities), residential fireplaces, and wood stoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as SO_2, NO_X, and VOC. "Inhalable" particulate matter, or PM_{10}, is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning, industrial sources, windblown dust from open lands; and atmospheric chemical and photochemical reactions.

$PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

Lead. Pb in the atmosphere occurs as particulate matter. Current sources of lead include manufacturers of batteries, paint, ink, ceramics, ammunition and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead; however, between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities are now becoming lead-emission sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

Sulfates. Sulfates are the fully oxidized ionic form of sulfur. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized to SO_2 during the combustion process and subsequently converted to sulfate compounds in the atmosphere. The conversion of SO_2 to sulfates takes place comparatively rapidly and completely in urban areas of California due to regional meteorological features.

The state sulfates standard is designed to prevent aggravation of respiratory symptoms. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function,

aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. Sulfates are particularly effective in degrading visibility, and, due to fact that they are usually acidic, can harm ecosystems and damage materials and property.

The SCAQMD does not have a standard or emissions threshold for sulfates. Instead, the SCAQMD provides methodology to analyze SO_2, which includes emissions threshold. Accordingly, this analysis provides a quantification of SO_2 emissions and not sulfates.

Hydrogen Sulfides. Hydrogen sulfide (H_2S) is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas, and can be emitted as the result of geothermal energy exploitation. Breathing H_2S at levels above the standard will result in exposure to a disagreeable odor.

Visibility-Reducing Particles. Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size, and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt. The statewide standard is intended to limit the frequency and severity of visibility impairment due to regional haze. A separate standard for visibility-reducing particles that is applicable only in the Lake Tahoe Air Basin is based on reduction in scenic quality. The SCAQMD does not have a standard, emissions threshold, or analysis methodology for visibility-reducing particles and, as such, further analysis is not required.

Vinyl Chloride. Vinyl chloride ("chloroethene"), a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride plastic and vinyl products. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents. Short-term exposure to high levels of vinyl chloride in air causes central nervous system effects, such as dizziness, drowsiness, and headaches. Long-term exposure to vinyl chloride through inhalation and oral exposure causes liver damage. Cancer is a major concern from exposure to vinyl chloride via inhalation. Vinyl chloride exposure has been shown to increase the risk of angiosarcoma, a rare form of liver cancer in humans.

Toxic Air Contaminants. An air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health, is identified as a toxic air contaminant ("TAC"). Sources of TACs include diesel engines, boilers, char-broilers, and automobile painting. TACs are identified by state and federal agencies based on a review of available scientific evidence. In the State of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act, Assembly Bill 1807, Tanner. This two-step process of risk identification and risk management was designed to protect residents from the health effects of toxic substances in the air.

The South Coast Air Quality Management District (the "SCAQMD"), the district with air quality jurisdiction over the Project, has a long and successful history of reducing air toxics and criteria

emissions in the South Coast Air Basin (the "Basin").[3] SCAQMD has an extensive control program, including traditional and innovative rules and policies. These policies can be viewed in the SCAQMD's *Air Toxics Control Plan for the Next Ten Years* (March 2000).

(2) Regional Air Quality

(a) Climate

The Project Site is located within the Los Angeles County portion of the Basin. Ambient pollution concentrations recorded in Los Angeles County are among the highest in the four counties comprising the Basin.

The Basin is in an area of high air pollution potential due to its climate and topography. The general region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. This Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The Basin experiences frequent temperature inversions. Temperature typically decreases with height. However, under inversion conditions, temperature increases as altitude increases, thereby preventing air close to the ground from mixing with the air above it. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO_2 react under strong sunlight, creating smog. Light, daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland, toward the mountains. During the fall and winter, air quality problems are created due to CO and NO_2 emissions. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.). In the morning, CO levels are relatively high due to cold temperatures and the large number of cars traveling. High CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Since CO is produced almost entirely from automobiles, the highest CO concentrations in the Basin are associated with heavy traffic. Similarly to CO diurnal trends, NO_2 levels are also generally higher during fall and winter days.

[3] The "Basin" is a subregion of the SCAQMD and covers an area of 6,745 square miles. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The Basin is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south.

(b) Attainment Status

As required by the federal Clean Air Act (the "CAA"), National Ambient Air Quality Standards (NAAQS) have been established for seven major air pollutants: CO, NO_2, O_3, $PM_{2.5}$, PM_{10}, SO_2, and Pb. The CAA requires the United States Environmental Projection Agency (the "USEPA") to designate areas as either attainment or nonattainment for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in *Table 4: State and National Ambient Air Quality Standards*. The USEPA has classified the Basin as nonattainment for O_3, $PM_{2.5}$, and PM_{10} and attainment for NO_2, SO_2 and Pb. As a result of State and local control strategies, the Basin has not exceeded the federal CO standard since 2002. As such, the Basin is a maintenance area for CO. In March 2005, the SCAQMD adopted a CO Redesignation Request and Maintenance Plan that provides for maintenance of the federal CO air quality standard until at least 2015 and commits to revising the Plan in 2013 to ensure maintenance through 2025. The SCAQMD also adopted a CO emissions budget that covers 2005 through 2015.

The California Ambient Air Quality Standards (the "CAAQS") are generally more stringent than the corresponding federal standards (the "NAAQS") and, as such, are used as the comparative standard in the air quality analysis contained in this analysis. The State standards are also summarized in *Table 4: State and National Ambient Air Quality Standards*.

The California Clean Air Act (the "CCAA") requires the California Air Resources Board ("CARB") to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, $PM_{2.5}$, and PM_{10} and attainment for CO, NO_2, SO_2, Pb, sulfates, hydrogen sulfide, and vinyl chloride.[4]

TABLE 4
STATE AND NATIONAL AMBIENT AIR QUALITY STANDARDS [1]

POLLUTANT	AVERAGING PERIOD	CALIFORNIA		FEDERAL	
		STANDARDS	ATTAINMENT STATUS	STANDARDS	ATTAINMENT STATUS
Ozone (O_3)	1-hour	0.09 ppm (180 $\mu g/m^3$)	Nonattainment	--	--
	8-hour	0.070 ppm (137 $\mu g/m^3$)	n/a	0.075 ppm (147 $\mu g/m^3$)	Nonattainment
Respirable Particulate Matter (PM_{10})	24-hour	50 $\mu g/m^3$	Nonattainment	150 $\mu g/m^3$	Nonattainment
	Annual Arithmetic Mean	20 $\mu g/m^3$	Nonattainment	--	--

[4] California Air Resources Board (CARB), http://www.arb.ca.gov/desig/adm/adm.htm (July 31, 2007).

TABLE 4 (CONTINUED)
STATE AND NATIONAL AMBIENT AIR QUALITY STANDARDS [1]

POLLUTANT	AVERAGING PERIOD	CALIFORNIA		FEDERAL	
		STANDARDS	ATTAINMENT STATUS	STANDARDS	ATTAINMENT STATUS
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 $\mu g/m^3$	Nonattainment
	Annual Arithmetic Mean	12 $\mu g/m^3$	Nonattainment	15 $\mu g/m^3$	Nonattainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 $\mu g/m^3$)	Attainment	9 ppm (10 mg/m^3)	Maintenance
	1-hour	20 ppm (23 $\mu g/m^3$)	Attainment	35 ppm (40 mg/m^3)	Maintenance
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (56 $\mu g/m^3$)	Attainment	0.053 ppm (100 $\mu g/m^3$)	Attainment
	1-hour	0.18 ppm (338 $\mu g/m^3$)	Attainment	--	--
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	--	--	0.030 ppm (80 $\mu g/m^3$)	Attainment
	24-hour	0.04 ppm (105 $\mu g/m^3$)	Attainment	0.14 ppm (365 $\mu g/m^3$)	Attainment
	3-hour	--	--	--	--
	1-hour	0.25 ppm (655 $\mu g/m^3$)	Attainment	--	--
Lead (Pb)	30-day average	1.5 $\mu g/m^3$	Attainment	--	--
	Calendar Quarter	--	--	1.5 $\mu g/m^3$	Attainment
Sulfates	24-hour	25 $\mu g/m^3$	Attainment	--	--
Hydrogen Sulfide	1-hour	0.03 ppm (42 $\mu g/m^3$)	Attainment	--	--
Vinyl Chloride	24-hour	0.01 ppm (26 $\mu g/m^3$)	Attainment	--	--
Visibility-Reducing Particulates	8-hour	Visibility of ten miles or more	Unclassified	--	--

[1] Source: CARB, Ambient Air Quality Standards, April 1, 2008.

(3) Local Meteorology

The mountains and hills within the Basin contribute to the variation of rainfall, temperature, and winds throughout the region. Within the Project Site and its vicinity, the average wind speed, as recorded at the Downtown Los Angeles Wind Monitoring Station, is approximately 3 miles per hour, with calm winds occurring approximately 55 percent of the time. Wind in the vicinity of the Project Site predominately blows from the southwest.[5]

[5]SCAQMD Website, http://www.aqmd.gov/smog/metdata/MeteorologicalData.html (April 24, 2008).

The annual average temperature in the project area is 65 degrees Fahrenheit (°F). The project area experiences an average winter temperature of approximately 58°F and an average summer temperature of approximately 72°F. Total precipitation in the project area averages approximately 15 inches annually. Precipitation occurs mostly during the winter and relatively infrequently during the summer. Precipitation averages approximately 8.9 inches during the winter, approximately 3.7 inches during the spring, approximately 2.0 inches during the fall, and less than 1 inch during the summer.[6]

(4) Local Air Quality

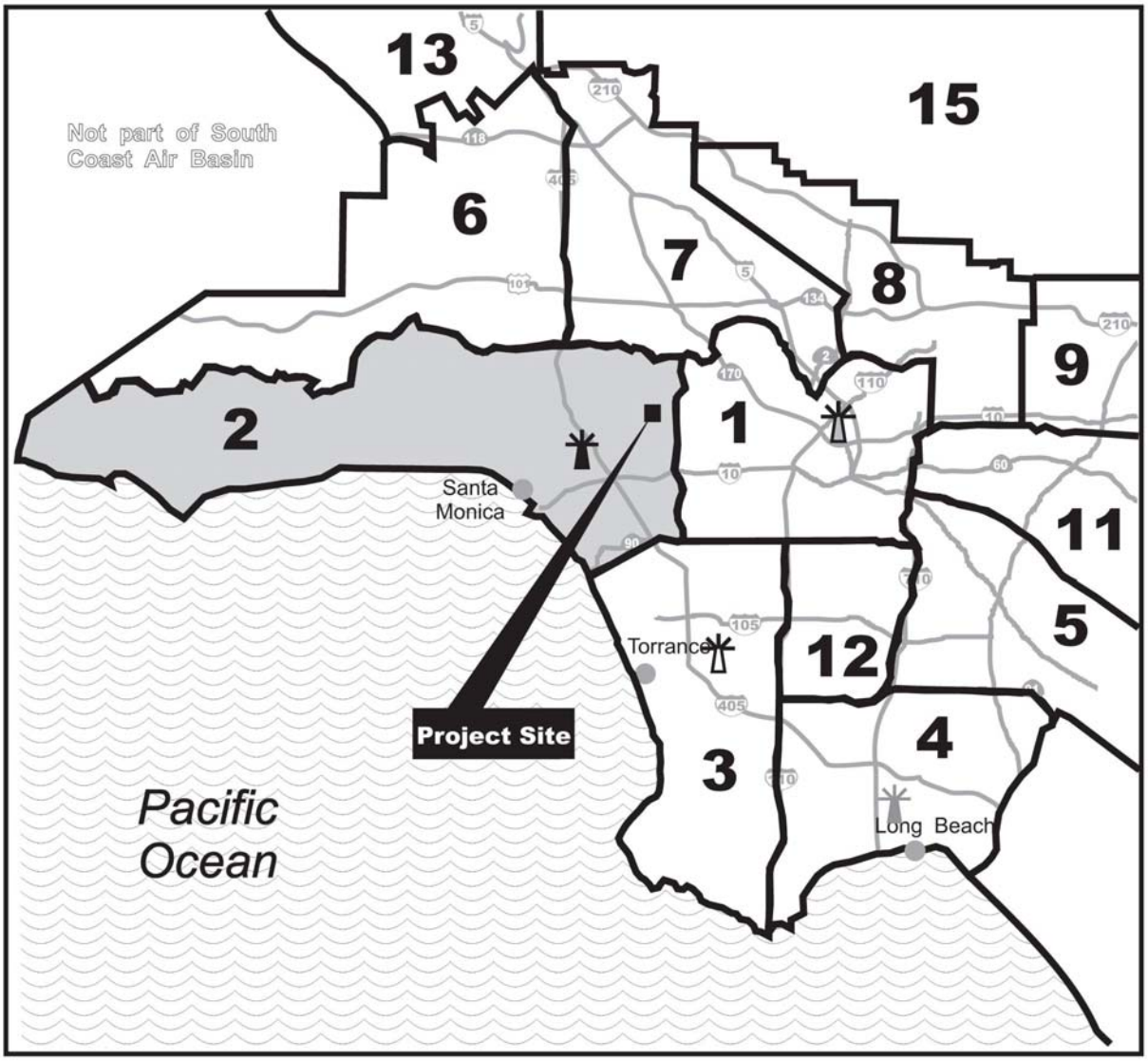
The SCAQMD monitors air quality conditions at 38 locations throughout the Basin. The Project Site is located in SCAQMD's Northwest Coastal Los Angeles County Air Monitoring Subregion, which is served by the West Los Angeles Monitoring Station. The West Los Angeles Monitoring Station is located approximately four miles west of the Project Site. Historical data from the West Los Angeles Monitoring Station were used to characterize existing conditions in the vicinity of the project area. Criteria pollutants monitored at the West Los Angeles Monitoring Station include O_3, CO, and NO_2. However, this monitoring station does not monitor $PM_{2.5}$, PM_{10}, and SO_2. The nearest, most representative monitoring station that gathers $PM_{2.5}$, PM_{10}, and SO_2 data is located approximately nine miles east of the Project Site at the Downtown Los Angeles Monitoring Station. The locations of the relevant air monitoring stations are shown in *Figure 26: Air Monitoring Areas*.

Table 5: Ambient Air Quality Data in Project Vicinity shows pollutant levels, the State standards, and the number of exceedances recorded at the West Los Angeles and Downtown Monitoring Stations from 2004 to 2006.[7] The CAAQS for the criteria pollutants are also shown in the table. As *Table 5: Ambient Air Quality Data in Project Vicinity* indicates, criteria pollutants CO, NO_2, and SO_2 did not exceed the CAAQS during the 2004 through 2006 period. However, the one-hour State standard for O_3 was exceeded three to seven times during this period, and the eight-hour State standard for O_3 was exceeded zero to eight times. The annual State standard for $PM_{2.5}$ was exceeded in 2004, 2005, and 2006. The 24-hour State standard for PM_{10} was exceeded five times in 2004, four times in 2005, and three times in 2006, and the $PM_{2.5}$ annual average was exceeded each year from 2004 to 2006.

TABLE 5
AMBIENT AIR QUALITY DATA IN PROJECT VICINITY [1]

POLLUTANT	POLLUTANT CONCENTRATION AND STANDARDS	NUMBER OF DAYS ABOVE STATE STANDARD		
		2004	2005	2006
Ozone	Maximum 1-hr Concentration (ppm)	0.11	0.11	0.10
	Days > 0.09 ppm (State 1-hr standard)	5	7	3
	Maximum 8-hr Concentration (ppm)	0.09	0.09	0.07
	Days > 0.07 ppm (State 8-hr standard)	8	5	0

[6]Western Regional Climate Center Website, http:// www.wrcc.dri.edu (Accessed May 12, 2008).
[7]Year 2007 SCAQMD data were not available at the time this analysis was completed.



LEGEND: West Los Angeles Monitoring Station Los Angeles Monitoring Station

Air Monitoring Areas in Los Angeles County:

1. Central Los Angeles
2. Northwest Coastal (West LA)
3. Southwest Coastal (Hawthorne)
4. South Coastal (Long Beach)
5. Southeast Los Angeles County
6. West San Fernando Valley
7. East San Fernando Valley
8. West San Gabriel Valley
9. East San Gabriel Valley
10. Pomona/Walnut Valley
11. South San Gabriel Valley
12. South Central Los Angeles
13. Santa Clarita Valley
14. Antelope Valley
15. San Gabriel Mountains

SOURCE: South Coast Air Quality Management District Air Monitoring Areas Map, 1989

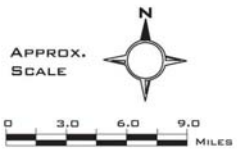


FIGURE 26
AIR MONITORING AREAS

TABLE 5 (CONTINUED)
AMBIENT AIR QUALITY DATA IN PROJECT VICINITY [1]

POLLUTANT	POLLUTANT CONCENTRATION AND STANDARDS	NUMBER OF DAYS ABOVE STATE STANDARD		
		2004	2005	2006
Carbon Monoxide	Maximum 1-hr concentration (ppm) Days > 20 ppm (State1-hr standard)	4 0	3 0	3 0
	Maximum 8-hr concentration (ppm) Days > 9.0 ppm (State 8-hr standard)	2.3 0	2.1 0	2.0 0
Nitrogen Dioxide	Maximum 1-hr Concentration (ppm) Days > 0.18 ppm (State 1-hr standard)	0.09 0	0.08 0	0.05 0
PM_{10}	Maximum 24-hr concentration ($\mu g/m^3$) Estimated Days > 50 $\mu g/m^3$ (State 24-hr standard)	72 5	70 4	59 3
$PM_{2.5}$	Maximum 24-hr concentration ($\mu g/m^3$) Exceed Standard (12 $\mu g/m^3$ Annual Arithmetic Mean)?	20 Yes	18 Yes	16 Yes
Sulfur Dioxide	Maximum 24-hr Concentration (ppm) Days > 0.04 ppm (State 24-hr standard)	0.01 0	0.01 0	0.00 0

[1] Source : Terry A Hayes Associates LLC, *Cedars-Sinai Medical Center Project Air Quality and Noise Impact Report*, August2008.

There is a direct relationship between traffic/circulation congestion and CO impacts because exhaust fumes from vehicular traffic are the primary source of CO. CO is a localized gas that dissipates very quickly under normal meteorological conditions. Therefore, CO concentrations decrease substantially as distance from the source (intersection) increases. The highest CO concentrations are typically found in areas directly adjacent to congested roadway intersections.

An exceedance of the State CO standards at an intersection is referred to as a "CO hotspot." The SCAQMD recommends a CO hotspot evaluation of potential localized CO impacts when V/C ratios are increased by two percent at intersections with a LOS of D or worse. SCAQMD also recommends a CO hotspot evaluation when an intersection decreases in LOS by one level, beginning when LOS changes from C to D.

For purposes of this assessment, the ambient, or background, CO concentration must first be established. SCAQMD defines the background level as the highest reading over the past three years. A review of data from the West Los Angeles Monitoring Station for the 2004 to 2006 period indicates that the highest one- and eight-hour background concentrations are approximately 4 and 2.3 ppm, respectively. Accordingly, the existing one- and eight-hour background concentrations do not exceed the State CO standard of 20 ppm and 9.0 ppm, respectively and therefore are in attainment.

From the 22 intersections analyzed in the traffic study,[8] CO concentrations adjacent to 13 intersections were modeled for existing conditions. In accordance with SCAQMD's recommendations, the study intersections were selected to be representative of the Project area

[8] Linscott, Law & Greenspan, Engineers, *Traffic Impact Study Cedars-Sinai Medical Center Project*, June 23, 2008.

and were based on traffic volume to capacity ("V/C") ratio and the traffic level of service ("LOS") as indicated in the traffic analysis.[9] The selected intersections are as follows:

- Robertson Boulevard/Beverly Boulevard – P.M. Peak Hour
- Robertson Boulevard/Alden Drive-Gracie Allen Drive – P.M. Peak Hour
- Robertson Boulevard/Third Street – A.M. Peak Hour
- Robertson Boulevard/Burton Way – P.M. Peak Hour
- George Burns Road/Beverly Boulevard – P.M. Peak Hour
- George Burns Road/Gracie Allen Drive – A.M. Peak Hour
- San Vicente Boulevard/Beverly Boulevard – P.M. Peak Hour
- San Vicente Boulevard/Third Street – A.M. Peak Hour
- San Vicente Boulevard/Burton Way – P.M. Peak Hour
- San Vicente Boulevard/Wilshire Boulevard – A.M. Peak Hour
- La Cienega Boulevard/Beverly Boulevard – A.M. Peak Hour
- La Cienega Boulevard/Third Street – A.M. Peak Hour
- La Cienega Boulevard/San Vicente Boulevard – P.M. Peak Hour

At each intersection, traffic-related CO contributions were added to background CO conditions. Traffic CO contributions were estimated using the USEPA CAL3QHC dispersion model, which utilizes traffic volume inputs and CARB EMFAC2007 emissions factors. Consistent with the California Department of Transportation ("Caltrans") CO protocol, receptors for the analysis were located three meters (approximately ten feet) from each intersection corner.[10] Existing conditions at the study intersections are shown in *Table 6: Existing Carbon Monoxide Concentrations*. One-hour CO concentrations range from approximately 4 to 6 ppm and eight-hour CO concentrations range from approximately 3.1 ppm to 3.9 ppm. Presently, none of the study intersections exceed the State one- and eight-hour CO standards of 20 ppm and 9.0 ppm, respectively, and therefore are in attainment.

TABLE 6
EXISTING CARBON MONOXIDE CONCENTRATIONS [1][2]

INTERSECTION	1-HOUR	8-HOUR
Robertson Boulevard/Beverly Boulevard	5	3.5
Robertson Boulevard/Alden Drive-Gracie Allen Drive	5	3.2
Robertson Boulevard/Third Street	5	3.4
Robertson Boulevard/Burton Way	5	3.5
George Burns Road/Beverly Boulevard	5	3.5
George Burns Road/Gracie Allen Drive	4	3.1
San Vicente Boulevard/Beverly Boulevard	5	3.6
San Vicente Boulevard/Third Street	5	3.6
San Vicente Boulevard/Burton Way	5	3.6

[9] "Level of service" (LOS) is used to indicate the quality of traffic flow on roadway segments and at intersections. Level of service ranges from LOS A (free flow, little congestion) to LOS F (forced flow, extreme congestion).
[10] California Department of Transportation (Caltrans), *Transportation Project-Level Carbon Monoxide Protocol*, 1997.

TABLE 6 (CONTINUED)
EXISTING CARBON MONOXIDE CONCENTRATIONS [1][2]

INTERSECTION	1-HOUR	8-HOUR
San Vicente Boulevard/Wilshire Boulevard	5	3.7
La Cienega Boulevard/Beverly Boulevard	5	3.7
La Cienega Boulevard/Third Street	5	3.6
La Cienega Boulevard/San Vicente Boulevard	6	3.9
State Standard	**20**	**9.0**

[1] Source: Terry A Hayes Associates LLC, *Cedars-Sinai Medical Center Project Air Quality and Noise Impact Report*, August 2008.
[2] All concentrations include one- and eight-hour ambient concentrations of 4 ppm and 2.3 ppm, respectively.

(5) Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following groups who are most likely to be affected by air pollution: children under 14, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, child care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes and similar facilities that support the groups most at risk. As shown in *Figure 27: Sensitive Air Quality Receptors*, sensitive receptors near the Project Site include the following:

- Medical office building located adjacent and to the north of the Project Site;
- Cedars-Sinai Medical Towers (including hospital facilities) located approximately 50 feet east and southeast of the Project Site;
- Single-family residences located along Bonner Drive approximately 400 feet north of the Project Site;
- Multi-family residences located along Clark Drive approximately 475 feet west of the Project Site; and
- Multi-family residences located along Burton Way approximately 975 feet south of the Project Site.

The above sensitive receptors occupy the nearest residential and medical land uses with the potential to be impacted by the Project. Additional single-family residences, multi-family residences, and CSMC Campus uses (e.g., the Thalians Mental Health Center, the North Patient Tower, and the South Patient Tower) are located in the surrounding community within one-quarter mile of the Project Site. Due to their distance from the Project Site, the sensitive receptors occupying these land uses would be impacted to a lesser degree than the identified sensitive receptors.

b. Regulatory and Policy Setting

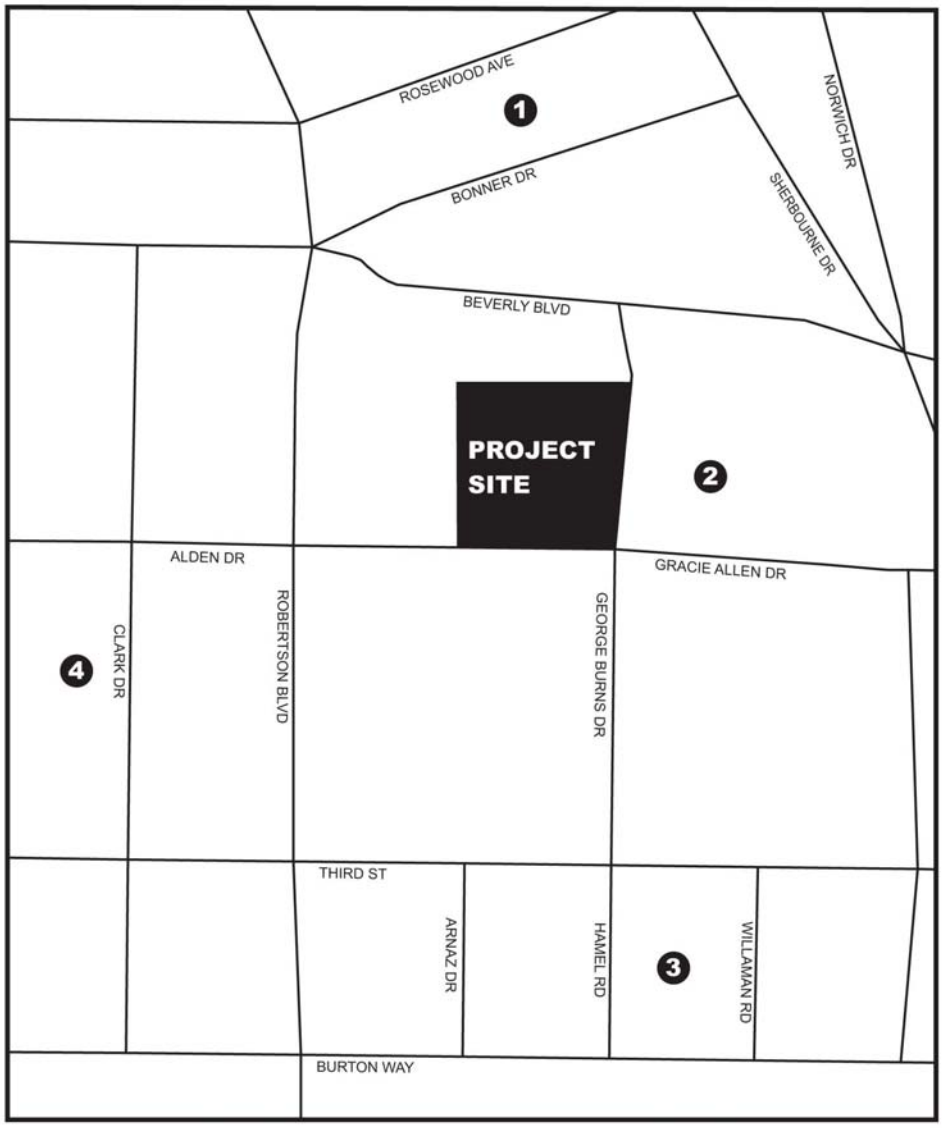
(1) Authority for Current Air Quality Planning

The CAA governs air quality in the United States. In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the CCAA. At the federal level, CAA is administered by the USEPA. In California, the CCAA is administered by the CARB at the State level and by the air quality management districts and air pollution control districts at the regional and local levels.

United States Environmental Protection Agency. USEPA is responsible for enforcing the federal CAA. USEPA is also responsible for establishing the NAAQS. NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside State waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in States other than California. Automobiles sold in California must meet stricter emission standards established by CARB.

California Air Resources Board. CARB, which became part of the California Environmental Protection Agency ("CalEPA") in 1991, is responsible for meeting the State requirements of the federal CAA, administering the CCAA, and establishing the CAAQS. The CCAA, as amended in 1992, requires all air districts in the State to endeavor to achieve and maintain the CAAQS. The CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride and visibility reducing particles. CARB regulates mobile air pollution sources, such as motor vehicles. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective on March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county levels.

South Coast Air Quality Management District. SCAQMD monitors air quality within the project area. SCAQMD has jurisdiction over an area of approximately 10,743 square miles, consisting of Orange County; the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties; and the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin. The 1977 Lewis Air Quality Management Act created SCAQMD to coordinate air quality planning efforts throughout Southern California. This Act merged four county air pollution control agencies into one regional district to better address the issue of improving air quality in Southern California. Under the Act, renamed the Lewis-Presley Air Quality Management Act in 1988, SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. Specifically, SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards in the district. Programs that were developed include air quality rules and regulations that regulate stationary sources, area



LEGEND: Project Site

(#) Sensitive Receptor Locations

1. Single-Family Homes
2. Medical Offices
3. Multi-Family Homes
4. Multi-Family Homes

SOURCE: South Coast Air Quality Management District Air Monitoring Areas Map, 1989

N

FIGURE 27
SENSITIVE AIR QUALITY RECEPTORS

SOURCE: TERRY A. HAYES AND ASSOCIATES

NORTH

sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

All areas designated as nonattainment under the CCAA are required to prepare plans showing how the area would meet the State air quality standards by its attainment dates. The Air Quality Management Plan (the "AQMP") is the region's plan for improving air quality in the region. It addresses CAA and CCAA requirements and demonstrates attainment with State and federal ambient air quality standards. The AQMP is prepared by SCAQMD and the Southern California Association of Governments ("SCAG"). The AQMP provides policies and control measures that reduce emissions to attain both State and federal ambient air quality standards by their applicable deadlines. Environmental review of individual projects within the Basin must analyze whether the proposed project's daily construction and operational emissions would exceed thresholds established by the SCAQMD. The environmental review must also analyze whether individual projects would not increase the number or severity of existing air quality violations.

The 2007 AQMP was adopted by the SCAQMD on June 1, 2007 and by the CARB on September 27, 2007. The 2007 AQMP proposes attainment demonstration of the federal $PM_{2.5}$ standards through a more focused control of SO_X, directly-emitted $PM_{2.5}$, and NO_X supplemented with VOC by 2015. The eight-hour ozone control strategy builds upon the $PM_{2.5}$ strategy, augmented with additional NO_X and VOC reductions to meet the standard by 2024. The 2007 AQMP also addresses several federal planning requirements and incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling tools. The 2007 AQMP is consistent with and builds upon the approaches taken in the 2003 AQMP. However, the 2007 AQMP highlights the significant amount of reductions needed and the urgent need to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria pollutant standards within the time frames allowed under the CAA.

(2) Global Climate Change

Global climate change refers to variances in Earth's meteorological conditions, which are measured by wind patterns, storms, precipitation, and temperature. There is general scientific agreement that the Earth's average surface temperature has increased by 0.3 to 0.6 degrees Celsius over the past century.[11] The reasons behind the increase in temperature are not well understood and are the subject of intense research activity. Many scientific studies have been completed to determine the extent that greenhouse gas ("GHG") emissions from human sources (e.g., fossil fuel combustion) affect the Earth's climate. The interrelationships between atmospheric composition, chemistry, and climate change are very complex. For example, historical records indicate a natural variability in surface temperature.[12] Historical records also indicate that atmospheric concentrations of a number of GHG have increased significantly since

[11] Finlayson-Pitts, Barbara J., and James N. Pitts, Jr., *Chemistry of the Upper and Lower Atmosphere* (Fawnskin, California: Academic Press, 1999).
[12] *Ibid*.

the beginning of the industrial revolution.[13] As such, significant attention is being given to anthropogenic (human-made) GHG emissions.

GHGs allow sunlight to enter the atmosphere freely. When sunlight strikes the Earth's surface, some of it is reflected back towards space as infrared radiation (heat). GHGs absorb this infrared radiation and trap the heat in the atmosphere. Over time, the amount of energy sent from the sun to the Earth's surface should be approximately equal to the amount of energy radiated from Earth back into space, leaving the temperature of the Earth's surface roughly constant. Some GHGs are emitted naturally (water vapor, carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O)), while others are exclusively human-made (e.g., gases used for aerosols). According to the California Energy Commission (the CEC), emissions from fossil fuel consumption represent approximately 81 percent of GHG emissions and transportation creates 41 percent of GHG emissions in California.[14]

California Legislation, Orders and Regulations. The State of California has traditionally been a pioneer in efforts to reduce air pollution, dating back to 1963 when the California New Motor Vehicle Pollution Control Board adopted the nation's first motor vehicle emission standards. Likewise, California has a long history of actions undertaken in response to the threat posed by climate change.

Assembly Bill ("AB") 1493, signed by California's governor in July 2002, requires passenger vehicles and light duty trucks to achieve maximum feasible reduction of GHG emissions by model year 2009.[15] AB 1493 was enacted based on recognition that passenger cars are significant contributors to the State's GHG emissions. Following the passage of the bill, the CARB was tasked to determine the reduction targets based on CARB's analysis of available and near-term technology and cost. After evaluating the options, the CARB established limits that will result in approximately a 22-percent reduction in GHG emissions from new vehicles by 2012, and approximately a 30-percent reduction by 2016.[16]

CARB's regulations were challenged in December 2004 in federal court by the Alliance of Automobile Manufacturers, who claimed that the law attempted to regulate vehicle fuel economy, a matter that lies within the exclusive jurisdiction of the federal government.[17] However, the United States District Court for the Eastern District of California issued a decision in December 2007 that rejected key elements of the Alliance's challenge and concluded that CARB's regulations are neither precluded nor preempted by federal statutes and policies. Even so, for California to implement a modification such as that represented in AB 1493, it must request a waiver pursuant to Section 209 of the Federal Clean Air Act. The United States

[13] *Ibid*.
[14] California Energy Commission, *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004*, http://www.energy.ca.gov/2006publications/CEC-600-2006-013/CEC-600-2006-013-SF.PDF (December 2006).
[15] State of California, AB 1493, July 22, 2002.
[16] Green Car Congress, *EPA Concludes Public Hearing s on California Waiver for New Vehicle CO2 Regulations*, http://www.greencarcongress.com/2007/05/epa_concludes_p.html (May 2007).
[17] The Federal Clean Air Act reserves the control of emissions from motor vehicles to the federal government, with the exception of California due to its early activity and special conditions (i.e., high density of motor vehicles, and topography conducive to pollution formation in heavily populated basins such as Los Angeles and the San Joaquin Valley), and any states that opt for the California regulations.

Environmental Protection Agency ("USEPA") has denied California's request for a waiver, and California has challenged that denial in court with a decision pending. As a result, CARB's proposed implementation schedule will not be implemented until and unless the pending litigation is resolved.

Title 24, adopted by the CEC on November 5, 2003, is the 2005 Building Energy Efficiency Standards for Residential and Nonresidential Buildings ("2005 Standards"). Title 24 is considered to be one of the most stringent sets of regulations for energy conservation in new buildings in the country. Mandatory measures in Title 24 requirements include, but are not limited to, minimum ceiling, wall, and raised floor insulation, minimum Heating, Ventilating and Air Conditioning ("HVAC"), and minimum water heating equipment efficiencies. The 2005 Standards are expected to reduce electricity use state-wide by 478 gigawatt-hours per year (GWh/y) and reduce the growth in natural gas use by 8.8 million therms per year.[18] The savings attributable to new nonresidential buildings are 163.2 GWh/y of electricity savings and 0.5 million therms of natural gas.[19] Additional savings would result from the application of the 2005 Standards on building alterations. In particular, requirements for cool roofs, lighting and air distribution ducts are expected to save about 175 GWh/y of electricity.[20] The State's 2005 Standards represent an important strategy that can make an important contribution to the reduction of GHG emissions.

On June 1, 2005, the Governor signed Executive Order S-3-05, establishing statewide GHG emissions reduction targets. The Order provides that by 2010, emissions must be reduced to 2000 levels; by 2020, emissions must be reduced to 1990 levels; and by 2050, emissions must be reduced to 80 percent below 1990 levels. The Secretary of the California Environmental Protection Agency ("CalEPA"), charged with coordinating oversight of efforts to meet these targets, formed California's Climate Action Team ("CAT") to carry out the Executive Order. The CAT member agencies[21] are collaborating to develop programs and strategies that can be implemented over the next two years to meet the Executive Order's emissions targets.

Several of these programs are relevant to new construction, as ways to mitigate air pollutants, including GHG emissions:

- Anti-idling: Construction vehicles will be regulated by CARB's anti- idling measures, which became effective on February 1, 2005. The measures are aimed at unnecessary engine idling within several classes of diesel-fueled commercial vehicles with a gross vehicular weight rating greater than 10,000 pounds. CARB estimates that over 400,000 vehicles will be affected, and GHG emissions will be reduced by 1.2 million tons CO_2 equivalent ($MMtCO_2e$) in 2020.

[18] California Energy Commission, *2005 Building Energy Efficiency Standards Nonresidential Compliance Manual*, http://www.energy.ca.gov/2005publications/CEC-400-2005-006/CEC-400-2005-006-CMF.PDF (March 2005).
[19] *Ibid*.
[20] *Ibid*.
[21] The CAT is comprised of representatives of the Business, Transportation, and Housing Agency, Department of Food and Agriculture, Resources Agency, Air Resources Board, Energy Commission, Integrated Waste Management Board, and Public Utilities Commission.

- Recycling: By providing recycling facilities within residential buildings and communities, developers can assist California in achieving its recycling goals. The Integrated Waste Management Board estimates that by achieving the 50 percent statewide recycling goal, established by the Integrated Waste Management Act of 1989, GHG emissions "associated with energy intensive material extraction and production as well as methane emission from landfills" will be reduced by 3 $MMtCO_2e$ in 2020. Exceeding that goal could reduce emissions by as much as 3 additional $MMtCO_2e$ in 2020.

- Building energy efficiency standards: New development will be subject to the Energy Commission's building energy efficiency standards, adopted and updated pursuant to Public Resources Code section 25402. The Commission estimates that the standards already in place will reduce GHG emissions by 2 $MMtCO_2e$ in 2020. New standards will go into effect in 2008, and will further reduce emissions.

- Green Buildings initiative: California's Green Buildings initiative, established by Executive Order S-20-04, aims to reduce energy use in commercial buildings by 20 percent from 2003 levels by 2015. Although compliance with the Green Building Action Plan is mandatory only for state-owned and -leased buildings, the initiative encourages the participation of private developers and building owners/operators. The State and Consumer Services Agency estimates that the initiative will reduce GHG emissions by 1.8 $MMtCO_2e$ in 2020.

- Water use efficiency: By implementing water-saving technologies and features, new construction can assist the Department of Water Resources (DWR) in its plan to reduce urban water use by 1.1 to 2.3 million acre feet per year. CAT's report notes that "19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. The California Energy Commission (CEC) estimates that 44 million tons of CO_2 emissions are expelled annually on average to provide the 44 million acre feet (MAF) of water used statewide." DWR estimates that the plan to increase water-use efficiency will reduce GHG emissions by 1.2 $MMtCO_2e$ in 2020.

On August 31, 2006, the California Senate passed Senate Bill (SB) 1368 (signed into law on September 29), requiring the Public Utilities Commission ("PUC") to develop and adopt a "greenhouse gases emission performance standard" by February 1, 2007, for the private electric utilities under its regulation. The PUC adopted an interim standard on January 25, 2007. The Energy Commission then adopted a consistent standard for the local publicly owned electric utilities under its regulation. These standards apply to all long-term financial commitments entered into by electric utilities. ("Long-term financial commitment" is defined as "either a new ownership investment in baseload generation or a new or renewed contract with a term of five or more years, which includes procurement of baseload generation." In turn, "baseload generation" is defined as "electricity generation from a powerplant that is designed and intended to provide electricity at an annualized plant capacity factor of at least 60 percent.") The performance standards must set an emissions rate equal to or less than that of combined-cycle natural gas baseload generation.

On September 27, 2006, AB 32, the California Global Warming Solutions Act of 2006, was enacted by the State of California.[22] In that statute, the Legislature stated that "Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California." AB 32 seeks to, among other things, cap California's GHG emissions at 1990 levels by 2020. Relevant gases defined by AB 32 as GHG pollutants include CO_2, CH_4, N_2O.[23] While acknowledging that national and international actions will be necessary to fully address the issue of global warming, AB 32 lays out a program to inventory and reduce GHG emissions in California. This bill represents the first enforceable Statewide program in the United States to cap all GHG emissions from major industries and include penalties for non-compliance.

AB 32 charges CARB with the responsibility to monitor and regulate sources of GHG emissions in order to reduce those emissions. On June 1, 2007, the CARB adopted three discrete "early action measures" to reduce GHG emissions. These measures involve complying with a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance and increasing methane capture from landfills.[24] On October 25, 2007, the CARB tripled the set of previously approved early action measures, as a result of which 44 GHG reduction strategies are now in place; these measures are either currently underway or are to be initiated by CARB in the 2007-2012 timeframe.[25] The newly approved measures include Smartway truck efficiency (i.e., reducing aerodynamic drag), port electrification, reducing perfluorocarbons from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexaflouride emissions from the non-electricity sector.

CARB is mandated by AB 32 to meet additional deadlines. Emission measures that cannot be initiated in the 2007-2012 timeframe will be considered in CARB's Scoping Plan, which CARB is now beginning to outline. AB 32 requires CARB to adopt the Scoping Plan prior to January 1, 2009 for achieving reductions in GHG emissions, and regulations by January 1, 2011 for reducing GHG emissions to achieve the emissions cap by 2020,[26] which rules would take effect no later than 2012.[27] In designing emission reduction measures, CARB must aim to minimize costs, maximize benefits, improve and modernize California's energy infrastructure, maintain electric system reliability, maximize additional environmental and economic benefits for California, and complement the State's ongoing efforts to improve air quality. AB 32 also directs CARB to "recommend a *de minimis* threshold of greenhouse gas emissions below which

[22] State of California, Health and Safety Code, Division 25.5 (California Global Warming Solutions Act of 2006), September 27, 2006.
[23] AB 32 also defines hydrofluorocarbons, perfluorocarbons and sulfur hexaflouride as GHG pollutants but these gases would not be emitted by the proposed Fashion Square expansion project.
[24] California Air Resources Board (CARB), *Proposed Early Actions to Mitigate Climate Change in California*, www.climatechange.ca.gov/climate_action_team/reports/2007-04-20_ARB_early_action_report.pdf (April 20, 2007).
[25] California Air Resources Board (CARB), *Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration,* October 2007.
[26] State of California, Health and Safety Code, Division 25.5 (California Global Warming Solutions Act of 2006), September 27, 2006
[27] *Ibid*.

emissions reduction requirements will not apply" by January 1, 2009.[28] CARB has suggested a 25,000 metric tonnes emissions level as a possible *de minimis* threshold.

California Senate Bill (SB) 97, passed in August 2007, is designed to work in conjunction with CEQA and AB 32.[29] CEQA requires the State Office of Planning and Research ("OPR") to prepare and develop guidelines for the implementation of CEQA by public agencies. SB 97 requires OPR by July 1, 2009 to prepare, develop, and transmit to the State Resources Agency its proposed guidelines for the feasible mitigation of GHG emissions, as required by CEQA, including, but not limited to, effects associated with transportation or energy consumption. The Resources Agency is required to certify and adopt the guidelines by January 1, 2010, and OPR is required to periodically update the guidelines to incorporate new information or criteria, such as those established by the CARB pursuant to AB 32. SB 97 would apply to any proposed or draft environmental impact report, negative declaration, mitigated negative declaration, or other document prepared under CEQA that has not been certified or adopted by the CEQA lead agency as of the effective date of the new guidelines. In addition, SB 97 exempts transportation projects funded under the Highway Safety, Traffic Reduction, Air Quality and Port Security Bond Act of 2006, or projects funded under the Disaster Preparedness and Flood Prevention Bond Act of 2006.

At this time, the USEPA does not regulate GHG emissions. However, in the case of *Massachusetts v. USEPA*, the United States Supreme Court issued a ruling (April 2007) that reviewed a USEPA decision not to regulate GHG emissions from cars and trucks under the CAA. The case, which focused on Section 202 of the CAA, resolved the following legal issues: (1) the Clean Air Act grants the USEPA authority to regulate GHG emissions, and (2) USEPA did not properly exercise its lawful discretion in deciding not to promulgate regulations concerning GHG emissions.

In addition to the State regulations, the City of Los Angeles has issued guidance promoting green building to reduce GHG emissions. The goal of the Green LA Action Plan (the "Plan") is to reduce greenhouse gas emissions 35 percent below 1990 levels by 2030.[30] The Plan identifies a concrete set of objectives and actions designed to make the City a leader in confronting global climate change. The measures would reduce emissions directly from municipal facilities and operations and create a framework to address Citywide GHG emissions. The Plan lists various focus areas in which to implement GHG reduction strategies. Focus areas listed in the Plan include energy, water, transportation, land use, waste, port, airport, and adaptation. The Plan discusses City goals for each focus area as follows:

Energy

- Increase the generation of renewable energy;
- Develop sustainable construction guidelines;
- Increase Citywide energy efficiency; and
- Promote energy conservation.

[28] HSC § 38561(e).
[29] State of California, SB 97, August 21, 2007.
[30] City of Los Angeles, *Green LA: An Action Plan to Lead the Nation in Fighting Global Warming*, May 2007

Water

- Decrease per capita water use to reduce electricity demand associated with water pumping and treatment.

Transportation

- Power the City vehicle fleet with alternative fuels; and
- Promote alternative transportation (e.g., mass transit and rideshare).

Other Goals

- Create a more livable City through land use regulations;
- Increase recycling, reducing emissions generated by activity associated with the Port of Los Angeles and regional airports;
- Create more city parks, promoting the environmental economic sector; and
- Adapt planning and building policies to incorporate climate change policy.

c. CSMC Campus Background and 1993 Approvals

Air quality conditions have changed since 1993 when the Master Plan was evaluated. Overall, ambient air quality has improved due to progress toward attainment of AQMP goals and the influence of cleaner operating vehicles. The Original EIR considered a range of air quality impacts in the context of rules, regulations, and ambient conditions in effect at that time. The Original EIR evaluated mobile, stationary and area-wide emissions generated during both the construction and operational phases of the Master Plan project.

The Original EIR concluded that grading activities would result in the production of dust (i.e., PM_{10}), which would result in a significant impact. Other construction-related air quality measures were concluded to be less than significant.

Long-term vehicular emissions from Master Plan related traffic was found to incrementally contribute to regional emissions, decreasing the regional air quality and exceeding SCAQMD thresholds for CO, NO_x and total organic gases (i.e., VOCs). Even with the adopted mitigation measures, the Original EIR concluded that implementation of the Master Plan would result in a residual significant adverse impact.

The Original EIR evaluated stationary sources due to activities at the project site and regional emissions due to consumption of electricity. The Original EIR concluded that the Master Plan would contribute stationary-source emissions, but that these impacts overall would be insignificant. Nonetheless, incorporation of energy conservation measures was recommended to further reduce stationary-source emissions.

The Original EIR also evaluated TACs and concluded that compliance with federal, state, and local regulations (governing hazardous materials and TACs) would reduce the risk associated

with these substances to acceptable levels; however, the overall resultant impact would be significant.

3. ENVIRONMENTAL IMPACTS

a. Methodology

This air quality analysis is consistent with the methods described in the SCAQMD *CEQA Air Quality Handbook* (1993 edition)("SCAQMD Handbook"), as well as the updates to the SCAQMD Handbook, as provided on the SCAQMD website.[31] The City of Los Angeles CEQA Thresholds Guide incorporates the SCAQMD criteria; therefore, the SCAQMD criteria presented here are consistent with those criteria established by the City of Los Angeles. Analyzed pollutants were selected based on guidance provided in the SCAQMD Handbook.

Regional and localized construction emissions were analyzed for the Project. The majority of construction emissions (i.e., demolition, site preparation, and building construction) were calculated using CARB's URBEMIS2007 model. Regional emissions were compared to SCAQMD regional thresholds to determine Project impact significance. The localized construction analysis followed guidelines published by the SCAQMD in the *Localized Significance Threshold Methodology for CEQA Evaluations* (SCAQMD Localized Significance Threshold ["LST"] Guidance Document).[32] The SCAQMD has supplemented the SCAQMD LST Guidance Document with *Sample Construction Scenarios for Projects Less than Five Acres in Size* and *Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds*.[33] Emissions for the localized construction air quality analysis of $PM_{2.5}$, PM_{10}, CO, and NO_2 were compiled using LST methodology promulgated by the SCAQMD.[34] Localized on-site emissions were calculated using similar methodology as the regional emission calculations. On-site emissions are generated by the use of heavy equipment and fugitive dust. LSTs were developed based upon the size or total area of the emissions source, the ambient air quality in each source receptor area, and the distance to the sensitive receptor. LSTs for CO and NO_2 were derived by using an air quality dispersion model to back-calculate the emissions per day that would cause or contribute to a violation of any ambient air quality standard for a particular source receptor area. Construction PM_{10} and $PM_{2.5}$ LSTs were derived using a dispersion model to back-calculate the emissions necessary to exceed a concentration equivalent to 50 $\mu g/m^3$ over five hours, which is the SCAQMD Rule 403 control requirement.

URBEMIS2007 was also used to calculate operational emissions (i.e., mobile and area). Localized CO emissions were calculated utilizing USEPA's CAL3QHC dispersion model and CARB's EMFAC2007 model. EMFAC2007 is the latest emission inventory model that calculates emission inventories and emission rates for motor vehicles operating on roads in

[31]SCAQMD, *CEQA Air Quality Handbook*, http://www.aqmd.gov/ceqa/hdbk.html (August 1, 2007).
[32]SCAQMD, *Localized Significance Threshold Methodology for CEQA Evaluations*, June 2003.
[33]SCAQMD, *Sample Construction Scenarios for Projects Less than Five Acres in Size, January 2005* and SCAQMD, *Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds,* October 2006.
[34]The concentrations of SO_2 are not estimated because construction activities would generate a small amount of SO_X emissions. No State standard exists for VOC. As such, concentrations for VOC were not estimated.

California. This model reflects the CARB's current understanding of how vehicles travel and how much they pollute. The EMFAC2007 model can be used to show how California motor vehicle emissions have changed over time and are projected to change in the future. CAL3QHC is a model developed by USEPA to predict CO and other pollutant concentrations from motor vehicles at roadway intersections. The model uses a traffic algorithm for estimating vehicular queue lengths at signalized intersections. The Project would not include significant stationary sources of emissions. Therefore, localized stationary source emissions were not analyzed.

The potential cumulative impact was analyzed based on Table A9-14 in the SCAQMD Handbook. The analysis compares the ratio of daily project-related employment vehicle miles traveled to daily countywide vehicle miles traveled to determine if it exceeds the ratio of Project-related employment to countywide employment.

No one methodology for projecting a project's net increase in GHG levels has been adopted. Therefore, for this analysis, GHG emissions were calculated using a combination of computer modeling, SCAQMD guidance, and the California Climate Action Registry's *General Reporting Protocol*.[35] Mobile and area source CO_2 emissions were obtained from the URBEMIS2007 model. Mobile source CH_4 and N_2O emissions were calculated based on the EMFAC2007 model. CH_4 and N_2O area source emissions were calculated using natural gas and electricity usage rates from the SCAQMD Handbook and emission rates from the General Reporting Protocol.

Project construction and operational emissions were compared to the emissions presented in the air quality section of the Original EIR. For construction activity, emissions associated with demolition of 90,000 square feet and 477,650 square feet of new construction were analyzed. However, for determination of impact significance levels, a net 290,000 square feet of new construction were compared to the emissions calculated in the Original EIR. For operational activity, emissions from 477,650 square feet of new construction were analyzed, but 200,000 new square feet were compared to operational emissions calculated in the Original EIR and were utilized in determining impact levels of significance.

The Project does not contain lead, hydrogen sulfide, and vinyl chloride emissions sources. Therefore, emissions and concentrations related to this pollutant are not analyzed in this Draft SEIR.[36]

b. Thresholds of Significance

The following are the significance criteria SCAQMD has established to determine project impacts.

[35]California Climate Action Registry, *General Reporting Protocol*, March 2007.
[36]Prior to 1978, mobile emissions were the primary source of lead resulting in air concentrations. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. Currently, industrial sources are the primary source of lead resulting in air concentrations. Since the proposed project does not contain an industrial component, lead emissions are not analyzed in this report.

Construction Phase Significance Criteria

Localized construction emission thresholds were developed by the SCAQMD to regulate criteria pollutants in the Basin. LSTs were developed based upon the size or total area of the emissions source, the ambient air quality in each source receptor area, and the distance to the sensitive receptor. LSTs for CO and NO_2 were derived by using an air quality dispersion model to back-calculate the emissions per day that would cause or contribute to a violation of any ambient air quality standard for a particular source receptor area. Construction PM_{10} and $PM_{2.5}$ LSTs were derived using a dispersion model to back-calculate the emissions necessary to exceed a concentration equivalent to 50 $\mu g/m^3$ over five hours, which is the SCAQMD Rule 403 control requirement.

Based on this SCAQMD guidance, the proposed Project would have a significant impact if:

- Daily regional and localized construction emissions were to exceed SCAQMD construction emissions thresholds for VOC, NO_X, CO, SO_X, $PM_{2.5}$, or PM_{10}, as presented in *Table 7: SCAQMD Daily Construction Emissions Thresholds*;

- The proposed Project would expose sensitive receptors to a carcinogenic risk that exceeds ten cases in a population of one million people or a noncarcinogenic risk that exceeds a health hazard index value of 1.0; or

- The proposed Project would create, or be subjected to, an objectionable odor that could impact sensitive receptors and would not comply with SCAQMD Rule 402 (Nuisance).

TABLE 7
SCAQMD DAILY CONSTRUCTION EMISSIONS THRESHOLDS

CRITERIA POLLUTANT	REGIONAL EMISSIONS (POUNDS PER DAY) [1]	LOCALIZED EMISSIONS (POUNDS PER DAY) [2]
Volatile Organic Compounds (VOC) **[3]**	75	--
Nitrogen Oxides (NO_X)	100	208
Carbon Monoxide (CO)	550	658
Sulfur Oxides (SO_X)	150	--
Fine Particulates ($PM_{2.5}$)	55	4
Particulates (PM_{10})	150	19

[1] SCAQMD, CEQA Air Quality Handbook, 1993.
[2] SCAQMD, Sample Construction Scenarios for Projects Less than Five Acres in Size, February 2005; SCAQMD, Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, October 2006.
[3]VOC is a subset of ROG. For purposes of this analysis, VOC is equivalent to ROG.
SOURCE: SCAQMD, 2007

Operations Phase Significance Criteria

Operational emission thresholds have been developed by SCAQMD to regulate criteria pollutants in the Basin. Based on this SCAQMD guidance, the project would have a significant impact if:

- Daily operational emissions were to exceed SCAQMD operational emissions thresholds for VOC, NO_X, CO, SO_X, $PM_{2.5}$, or PM_{10}, as presented in *Table 8: SCAQMD Daily Operational Emissions Thresholds*;

- Project-related traffic causes CO concentrations at study intersections to violate the CAAQS for either the one- or eight-hour period. The CAAQS for the one- and eight-hour periods are 20 ppm and 9.0 ppm, respectively. If CO concentrations currently exceed the CAAQS, then an incremental increase of 1.0 ppm over "no Project" conditions for the one-hour period would be considered a significant impact. An incremental increase of 0.45 ppm over the "no Project" conditions for the eight-hour period would be considered significant[37];

- The proposed Project would expose sensitive receptors to a carcinogenic risk that exceeds ten cases in a population of one million people or a noncarcinogenic risk that exceeds a health hazard index value of 1.0;

- The proposed Project would have the potential to create, or be subjected to, an objectionable odor that could impact sensitive receptors, and would not comply with SCAQMD Rule 402 (Nuisance); and

- The proposed Project would not be consistent with the AQMP if it would (1) result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP, or (2) exceed the assumptions in the AQMP in 2010 or increments based on the year of Project build-out phase.

TABLE 8
SCAQMD DAILY OPERATIONAL EMISSIONS THRESHOLDS [1]

CRITERIA POLLUTANT	POUNDS PER DAY
Volatile Organic Compounds (VOC)	55
Nitrogen Oxides (NO_X)	55
Carbon Monoxide (CO)	550
Sulfur Oxides (SO_X)	150
Fine Particulates ($PM_{2.5}$)	55
Particulates (PM_{10})	150
[1] Source: SCAQMD, 2007	

[37]Consistent with the SCAQMD Regulation XIII definition of a significant impact.

Cumulative Significance Criteria

Based on SCAQMD guidance, the proposed Project would have a significant cumulative impact if:

- The ratio of daily Project-related employment vehicle miles traveled to daily countywide vehicle miles traveled would exceed the ratio of Project-related employment to countywide employment.

c. Project Impacts

(1) Construction Activity

(a) Regional Impacts

Construction of the Project (i.e., demolition of the existing 90,000 square-foot building; replacement of the 90,000 square feet of floor area that will be demolished; construction of the remaining entitlement under the existing Master Plan, which consists of 170,650 square feet of floor area; and construction of 200,000 square feet of new additional floor area) has the potential to create air quality impacts through the use of heavy-duty equipment, haul/delivery truck trips, worker commute trips, and fugitive dust from excavation and grading activity. Based on the size of the Project Site and the type of development proposed, the following conservative assumptions were used for the air quality analysis:

- Use of seven pieces of equipment operating simultaneously for eight hours during each day of construction;
- Generation of 2,000 cubic yards of demolition debris per day over a 4 to 5 week period for demolition of the Existing Building;
- A maximum disturbed area of two acres per day during excavation and/or grading;
- Generation of 100 delivery/haul truck trips per day;
- 100 workers per day; and
- Application of architectural coating over a six-month time period.

Although construction of the West Tower may not be initiated until Year 2018 or later, the construction emissions for the Project were analyzed for Year 2010. This year represents a conservative, "worst-case" maximum emissions scenario because harmful equipment and vehicle exhaust emissions will decrease in future years due to improved emissions technology and legislative and regulatory mandates. Construction activity, including demolition, is assumed to occur over an approximate 36-month time period. Per URBEMIS2007, fugitive dust emissions were calculated based on an emission rate of 20 pounds per disturbed acre. In addition, it was assumed that construction stages would not overlap since each stage must be completed to allow the next stage to begin.

Table 9: Estimated Daily Construction Emissions – Unmitigated shows the estimated maximum unmitigated daily construction emissions associated with the demolition of the existing 90,000 square-foot building, replacement of the 90,000 square feet of floor area that will be demolished, the construction of the 170,650 square feet of floor area from a previously approved Master Plan,

and the construction of 200,000 square feet of new additional floor area. Analysis of PM_{10} emissions assumed compliance with SCAQMD Rule 403 and applicable mitigation measures adopted in connection with the Master Plan. It is mandatory for all construction projects in the Basin to comply with SCAQMD Rule 403 for fugitive dust. As shown, daily construction emissions would not exceed the significance thresholds for CO, SO_X, $PM_{2.5}$, and PM_{10}. However, the maximum daily construction emissions would exceed the significance thresholds for VOC and NO_X due primarily to architectural coating and haul truck emissions. As such, the Project would result in a short-term construction air quality impact from VOC and NO_X emissions without implementation of mitigation measures.

TABLE 9
ESTIMATED DAILY CONSTRUCTION EMISSIONS – UNMITIGATED [1]

	POUNDS PER DAY					
	VOC	**NO_X**	**CO**	**SO_X**	**$PM_{2.5}$ [2]**	**PM_{10} [2]**
Daily Demolition Emissions	69	234	154	<1	29	91
Daily Grading/Excavation Emissions	69	234	154	<1	28	84
Daily Building Construction Emissions	79	70	33	<1	3	3
Maximum Daily Emissions	**79**	**234**	**154**	**<1**	**29**	**91**
SCAQMD Regional Significance Threshold	**75**	**100**	**550**	**150**	**55**	**150**
Exceed Threshold?	Yes	Yes	No	No	No	No
Maximum On-Site Total	79	70	27	<1	19	80
Localized Significance Threshold [3]	**--**	**208**	**658**	**--**	**4**	**19**
Exceed Threshold?	--	No	No	--	Yes	Yes

[1] Source: Terry A Hayes Associates LLC, *Cedars-Sinai Medical Center Project Air Quality and Noise Impact Report*, August 2008.
[2] Assumes implementation of SCAQMD Rule 403 and the mitigation measures adopted in connection with the Master Plan approval. URBEMIS2007 emissions for fugitive dust were adjusted to account for a 61 percent control efficiency associated with SCAQMD Rule 403.
[3] The localized significance thresholds were developed using a two-acre Project Site and a 25-meter (82-foot) receptor distance.

Implementation of the Mitigation Program (see below) would reduce fugitive dust emissions by approximately 61 percent, so that daily $PM_{2.5}$ and PM_{10} emissions would be less than the SCAQMD threshold of 150 pounds per day. Further, the mitigation measure would reduce VOC from architectural coating by 10 percent. As demonstrated in *Table 10: Estimated Daily Construction Emissions – Mitigated*, regional construction emissions of VOC, CO, SO_X, $PM_{2.5}$ and PM_{10} would be less than the SCAQMD significance thresholds. However, a significant and unavoidable regional NO_X impact would occur during the maximum estimated construction phase of 36 months.

As identified in the Original EIR, construction activity due to implementation of the Master Plan would result in a total emission of 38 ppd of VOC, 253 ppd of NO_X, 114 ppd of CO, 41 ppd of SO_X, and 145 ppd of PM_{10}. The emissions would be generated from fugitive dust, construction equipment and machinery, and haul trucks. Emissions for $PM_{2.5}$ were not calculated since SCAQMD did not require the analysis of $PM_{2.5}$ and did not provide a methodology to analyze

$PM_{2.5}$ when the Original EIR was prepared. Daily VOC and CO emissions during construction of the Master Plan were lower than the proposed project, and daily NO_X, SO_X, and PM_{10} emissions were higher than the proposed project. According to the Original EIR, NO_X would exceed the SCAQMD NO_X threshold. The Original EIR concluded that build-out of the Master Plan would result in significant and unavoidable impacts due to grading and excavation.

TABLE 10
ESTIMATED DAILY CONSTRUCTION EMISSIONS – MITIGATED [1]

	POUNDS PER DAY					
	VOC	**NO_X**	**CO**	**SO_X**	**$PM_{2.5}$ [2]**	**PM_{10} [2]**
Daily Demolition Emissions	69	234	154	<1	29	91
Daily Grading/Excavation Emissions	69	234	154	<1	28	84
Daily Building Construction Emissions	71	70	33	<1	3	3
Maximum Daily Emissions	71	234	154	<1	29	91
SCAQMD Regional Significance Threshold	**75**	**100**	**550**	**150**	**55**	**150**
Exceed Threshold?	No	Yes	No	No	No	No
Maximum On-Site Total	71	70	27	<1	19	80
Localized Significance Threshold [3]	**--**	**208**	**658**	**--**	**4**	**19**
Exceed Threshold?	--	No	No	--	Yes	Yes

[1] Source: Terry A Hayes Associates LLC, *Cedars-Sinai Medical Center Project Air Quality and Noise Impact Report*, August 2008.
[2] Assumes implementation of SCAQMD Rule 403 and the mitigation measures adopted in connection with the Master Plan approval. URBEMIS2007 emissions for fugitive dust were adjusted to account for a 61 percent control efficiency associated with SCAQMD Rule 403.
[3] Assumed a two-acre project site and a 25-meter (82-foot) receptor distance. This is the smallest distance between source and receptor to be analyzed under the SCAQMD LST methodology.

(b) Localized Impacts

As explained above, emissions for the localized construction air quality analysis of $PM_{2.5}$, PM_{10}, CO, and NO_2 were compiled using LST methodology promulgated by the SCAQMD. Localized on-site emissions were calculated using similar methodology and assumptions as were used in the regional emission calculations. On-site emissions are generated by the use of heavy-duty construction equipment and fugitive dust, as discussed under "Regional Impacts," above.

Table 9: Estimated Daily Construction Emissions – Unmitigated (above) shows the estimated localized emissions associated with construction. As shown, localized construction emissions would not exceed the SCAQMD localized thresholds for NO_X or CO. However, localized construction emissions would exceed the significance thresholds for $PM_{2.5}$ and PM_{10}, and, as such, localized construction emissions would result in a short-term air quality impact without implementation of mitigation measures. Localized construction emissions were not analyzed in the Original EIR.

(c) Toxic Air Contaminant ("TAC") Impacts

Asbestos-containing materials ("ACMs") were widely used in structures built between 1945 and 1980. Lead-based paint was primarily used from the 1920s through 1978. According to the Los Angeles County Office of the Assessor, the Existing Building on the Project Site was built in 1947. Thus, the Existing Building, which would be demolished as part of the proposed Project, is likely to have ACMs and lead-based paint. Demolition activities have the potential to result in the accidental release of ACMs and lead into the atmosphere. As such, demolition activities may potentially result in significant impacts without implementation of mitigation measures addressing ACMs and lead-based paint.

The greatest potential for TAC emissions during grading/excavation and building construction activities would be diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Assuming a short-term construction schedule of approximately 36 months, the Project would not result in a long-term (i.e., 70 years) source of TAC emissions, or to long-term exposure of TAC emissions. The associated risk would be below the carcinogenic risk of ten chances in a population of one million people and below the noncarcinogenic health hazard index value of 1.0. As such, Project-related construction TAC emission would result in a less than significant impact. Construction TAC emissions were not analyzed in the Original EIR.

(d) Odor Impacts

Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the Project Site. The Project would utilize typical construction techniques that reduce odors, and any remaining odors would be typical of most construction sites and temporary. As such, Project construction would not cause an odor nuisance, and construction odors would result in a less than significant impact. Construction odor impacts were not discussed in the Original EIR.

(2) Long-Term Operation

The Project will implement a variety of design and operational features (i.e., PDFs) to achieve energy efficiency, which in turn serve to directly and proactively reduce GHG and other air pollutant emissions. Implementation of the "sustainable strategies" described in *Section II.F: Project Characteristics* of this Draft SEIR would directly reduce project-related energy use and address indoor air quality conditions. For the air quality analysis, these PDFs are assumed to be incorporated into the Project and the effective reduction credit accounted for in the project-level impact assessment. Examples of design features to be implemented for the Project to achieve enhanced energy efficiency (and thereby reduce air quality impacts) include, but are not limited to, the following or their equivalent:

- The CSMC Campus, including the Project Site, is conveniently located with respect to public transit opportunities. Given the Project Site's location within an established urban area, access to a number of existing Los Angeles Metro bus lines is available, and a potential Metro Rail station at the northeast corner of the CSMC Campus may be available in the future, thereby reducing traffic, air quality, noise, and energy effects.

- 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.

- The West Tower design incorporates light-colored roofing and paving materials which serve to reduce unwanted heat absorption and minimize energy consumption.

- Building materials and new equipment associated with the West Tower are selected to avoid materials that might incorporate atmosphere-damaging chemicals.

- The West Tower energy performance is designed to be 14% more effective than required by California Title 24 Energy Design Standards, thereby reducing energy use, air pollutant emissions and greenhouse gas emissions.

- The West Tower will generate 2.5% of the building's total energy use through on-site renewable energy sources. On-site renewable energy sources can include a combination of photovoltaic, wind, hydro, wave, tidal and bio-fuel based electrical production systems, as well as solar thermal and geothermal energy systems.

- The West Tower will use materials with recycled content such that the sum of post-consumer content plus one-half of the pre-consumer content constitutes at least 10% (based on cost) of the total value of the materials in the Project.

- Lighting systems within the West Tower will be controllable to achieve maximum efficiency (e.g., uniform general ambient lighting, augmented with individually controlled task lighting that accommodates user-adjustable lighting levels and automatic shutoff switching).

- The West Tower will be designed to provide occupant thermal comfort dissatisfaction levels above 85%.

(a) Regional Impacts

Long-term Project emissions would be generated by area sources, such as natural gas combustion and consumer products (e.g., aerosol sprays) and mobile sources. Motor vehicles generated by the Project would be the predominate source of long-term Project emissions. According to the traffic report, the additional 200,000 square feet of floor area, or 100 new inpatient beds, would generate 1,181 daily vehicle trips per day. Concurrently, the 170,650 square feet remaining

under the Master Plan would generate 5,324 daily vehicle trips per day.[38] These trips were analyzed in the Original EIR. The 90,000 square feet of floor area associated with the Existing Building would result in vehicle trip volumes similar to those currently generated.

Mobile and area source emissions were estimated using URBEMIS2007, assuming a Year 2023 operational date, by which time the Project is expected to be fully operational and fully occupied. The Project would be required to comply with applicable mitigation measures adopted in connection with approval of the Master Plan, which includes implementing a Transportation Demand Management program consistent with the provisions of SCAQMD Regulation XV. Daily operational emissions for Year 2023 are shown in *Table 11: Estimated Daily Operational Regional Emissions*. As shown, regional operational emissions from area sources and from mobile sources would not exceed SCAQMD significance thresholds, and, as such, would result in a less than significant impact.

The Original EIR stated that the Master Plan would result in a total of 192 ppd of ROG, 593 ppd of NO_X, 1,795 ppd of CO, 9 ppd of SO_X, and 3 ppd of PM_{10}.[39] Mobile sources would result in approximately 190 ppd of ROG, 480 ppd of NO_X, and 1,776 ppd of CO. These emissions are associated with motor vehicles. Area (or stationary sources) would result in approximately 2 ppd of ROG, 114 ppd of NO_X, 20 ppd of CO, 9 ppd of SO_X, and 3 ppd of PM_{10}. The Original EIR identified significant regional air quality impacts during operations since the Master Plan that was analyzed at the time exceeded the SCAQMD thresholds for ROG, CO, and NO_X. Therefore, the impacts associated with operation of the Project as analyzed in this air quality analysis would be less than the impacts identified in the Original EIR. The Original EIR did not identify emissions associated with SO_X, $PM_{2.5}$, and PM_{10} and emissions associated with area sources.

TABLE 11
ESTIMATED DAILY OPERATIONAL REGIONAL EMISSIONS [1]

EMISSION SOURCE	POUNDS PER DAY					
	VOC	NO_X	CO	SO_X	$PM_{2.5}$	PM_{10}
SCAQMD Regional Threshold	**55**	**55**	**550**	**150**	**55**	**150**
Remaining Master Plan (170,650 square feet)						
Mobile Sources	23	33	282	<1	18	90
Area Sources [2]	<1	1	3	<1	<1	<1
Total Emissions	**23**	**34**	**285**	**<1**	**18**	**90**
Exceed Threshold?	No	No	No	No	No	No
Existing Building (90,000 square feet)						
Mobile Sources	7	10	84	<1	5	27
Area Sources [2]	<1	1	2	<1	<1	<1
Total Emissions	7	11	86	<1	5	27
Exceed Threshold?	No	No	No	No	No	No
Master Plan Amendment (100 inpatient beds equivalent to 200,000 square feet)						

[38] Linscott, Law & Greenspan Engineers, *Traffic Impact Study Cedars-Sinai Medical Center Project*, June 23, 2008.
[39] Emissions may not add up due to rounding.

TABLE 11 (CONTINUED)
ESTIMATED DAILY OPERATIONAL REGIONAL EMISSIONS [1]

EMISSION SOURCE	POUNDS PER DAY					
	VOC	NO_X	CO	SO_X	$PM_{2.5}$	PM_{10}
Mobile Sources	5	7	63	<1	4	20
Area Sources [2]	<1	<1	2	<1	<1	<1
Total Emissions	**5**	**7**	**65**	**<1**	**4**	**20**
Exceed Threshold?	No	No	No	No	No	No
Total West Tower Project (460,650 square feet = 90,000 sf + 170,650 sf + 200,000 sf)						
Mobile Sources	35	50	429	<1	27	137
Area Sources [2]	<1	2	7	<1	<1	<1
Total Emissions	**35**	**52**	**436**	**<1**	**27**	**137**
Exceed Threshold?	No	No	No	No	No	No

[1] Source: Terry A Hayes Associates LLC, *Cedars-Sinai Medical Center Project Air Quality and Noise Impact Report*, August2008.
[2] Area sources include emissions from natural gas combustion and consumer product (e.g., aerosol sprays).

(b) Localized Impacts

The Project would not include substantial stationary sources of localized emissions. However, the State one- and eight-hour CO standards may potentially be exceeded at congested intersections with high traffic volumes in Year 2023. Based on the traffic study, the selected intersections are as follows:

- Robertson Boulevard/Beverly Boulevard – P.M. Peak Hour
- Robertson Boulevard/Alden Drive-Gracie Allen Drive – P.M. Peak Hour
- Robertson Boulevard/Third Street – A.M. Peak Hour
- Robertson Boulevard/Burton Way – P.M. Peak Hour
- George Burns Road/Beverly Boulevard – P.M. Peak Hour
- George Burns Road/Gracie Allen Drive – A.M. Peak Hour
- San Vicente Boulevard/Beverly Boulevard – P.M. Peak Hour
- San Vicente Boulevard/Third Street – A.M. Peak Hour
- San Vicente Boulevard/Burton Way – P.M. Peak Hour
- San Vicente Boulevard/Wilshire Boulevard – A.M. Peak Hour
- La Cienega Boulevard/Beverly Boulevard – A.M. Peak Hour
- La Cienega Boulevard/Third Street – A.M. Peak Hour
- La Cienega Boulevard/San Vicente Boulevard – P.M. Peak Hour

The USEPA CAL3QHC micro-scale dispersion model was used to calculate CO concentrations for the Year 2023 "No Project" and "Project" conditions. The "No Project" conditions represent Year 2023 cumulative conditions without the implementation of the Project, but include the remaining Master Plan build-out (i.e., 170,650 square feet), the existing 90,000 square-foot building, as well as Related Projects within the vicinity of the Project Site, and ambient traffic growth through 2023. "Project" conditions include the addition of 200,000 square feet of floor area for medical uses, or 100 beds, and Year 2023 "No Project" conditions. CO concentrations at the five study intersections are shown for the peak hours in *Table 12: Carbon Monoxide*

Concentrations. As indicated, one-hour CO concentrations under "Project" conditions would be approximately 2 ppm at worst-case sidewalk receptors. Eight-hour CO concentrations under "Project" conditions would range from approximately 1.2 ppm to 1.7 ppm. The State one- and eight-hour standards of 20 ppm and 9.0 ppm, respectively, would not be exceeded at the 13 study intersections. Thus, the CO hotspots analysis demonstrates that the Project would result in a less-than-significant CO hotspot impact.

Because CO is a gas that disperses quickly, CO concentrations at sensitive receptor locations at 2023 are expected to be much lower than CO concentrations adjacent to the roadway intersections. Additionally, the intersections were selected for the CO hotspots analysis based on poor LOS and high traffic volumes. Sensitive receptors that are located away from congested intersections or are located near roadway intersections with better LOS would be exposed to lower CO concentrations than concentrations modeled at the intersections. As shown in *Table 12: Carbon Monoxide Concentrations*, CO concentrations would not exceed the State one- and eight-hour standards. Thus, no significant increase in CO concentrations at sensitive receptor locations is expected, resulting in a less than significant impact.

In the Original EIR, one-hour CO concentrations under "Project" conditions ranged from 12.7 ppm to 18.2 ppm projected in 2005, which were below the State one-hour standard. Eight-hour CO concentrations under "Project" conditions ranged from 7.9 ppm to 10.9 ppm projected in 2005. The Original EIR identified four intersections that would exceed the State eight-hour standard. The estimated one- and eight-hour CO concentrations for the Master Plan and the Project in 2023 are much lower than the CO concentrations identified in the Original EIR due to stringent State and federal mandates for lowering vehicle emissions. The CO impact associated with the Project when compared to the Master Plan is less than the impact identified in the Original EIR.

TABLE 12
CARBON MONOXIDE CONCENTRATIONS [1][2]

INTERSECTION	1-HOUR (PARTS PER MILLION)			8-HOUR (PARTS PER MILLION)		
	EXISTING (2007)	NO PROJECT (2023)	PROJECT (2023)	EXISTING (2007)	NO PROJECT (2023)	PROJECT (2023)
Robertson Boulevard/Beverly Boulevard	5	2	2	3.5	1.3	1.3
Robertson Boulevard/Alden Drive-Gracie Allen Drive	5	2	2	3.2	1.5	1.5
Robertson Boulevard/Third Street	5	2	2	3.4	1.4	1.4
Robertson Boulevard/Burton Way	5	2	2	3.5	1.5	1.5
George Burns Road/Beverly Boulevard	5	2	2	3.5	1.4	1.4
George Burns Road/Gracie Allen Drive	4	2	2	3.1	1.2	1.2
San Vicente Boulevard/Beverly Blvd.	5	2	2	3.6	1.5	1.5
San Vicente Boulevard/Third Street	5	2	2	3.6	1.5	1.5
San Vicente Boulevard/Burton Way	5	2	2	3.6	1.5	1.5

TABLE 12 (CONTINUED)
CARBON MONOXIDE CONCENTRATIONS [1][2]

INTERSECTION	1-HOUR (PARTS PER MILLION)			8-HOUR (PARTS PER MILLION)		
	EXISTING (2007)	NO PROJECT (2023)	PROJECT (2023)	EXISTING (2007)	NO PROJECT (2023)	PROJECT (2023)
San Vicente Boulevard/Wilshire Boulevard	5	2	2	3.7	1.6	1.6
La Cienega Boulevard/Beverly Boulevard	5	2	2	3.7	1.6	1.6
La Cienega Boulevard/Third Street	5	2	2	3.6	1.5	1.5
La Cienega Boulevard/San Vicente Boulevard	6	2	2	3.9	1.7	1.7
State Standard	**20**			**9.0**		

[1] Source: Terry A Hayes Associates LLC, *Cedars-Sinai Medical Center Project Air Quality and Noise Impact Report*, August 2008.
[2] Existing concentrations include year 2007 one- and eight-hour ambient concentrations of 4.0 ppm and 2.3 ppm, respectively. No Project and Project concentrations include year 2023 one- and eight-hour ambient concentrations of 2 ppm and 1.1 ppm, respectively.

The Project would not include significant stationary source or on-site mobile equipment emissions and, as such, operational emissions were not analyzed using SCAQMD LST methodology.

(c) Toxic Air Contaminant ("TAC") Impacts

The SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate matter emissions (e.g., truck stops and warehouse distribution facilities), which is considered to be a TAC, and has provided guidance for analyzing these mobile source diesel engine emissions.[40]

The Project would establish medical uses on the Project Site, including 100 new inpatient beds and associated ancillary services. The primary source of potential TACs associated with Project operations would be diesel particulate matter emissions from delivery trucks (e.g., truck traffic on local streets and on-site truck idling). The medical uses themselves are not anticipated to generate a substantial number of new daily truck trips because the Project, like the rest of the CSMC Campus, would be served by Central Services. Therefore, the number of additional heavy-duty trucks (e.g., delivery trucks) accessing the Project Site on a daily basis as a result of the Project would be minimal, consistent with the CARB anti-idling regulation, the trucks that do visit the site would not idle on-site for more than five minutes. Based on the limited additional TAC emissions generated by the Project, the Project would not be a substantial source of diesel particulate matter emissions so as to warrant the need for a health risk assessment associated with on-site activities. The associated risk would be below the carcinogenic risk of ten chances in a population of one million people and below the noncarcinogenic health hazard index value of 1.0. As such, potential TAC impacts would be less than significant.

[40] SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions*, December 2002.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities. The Project would not include any of these potential sources, although minimal emissions may result from the use of consumer products (e.g., aerosol sprays). The Project may increase the amount of medical waste incinerated on the CSMC Campus. The Original EIR, which included mitigation measures to reduce reliance on hazardous materials, discussed regulations and impacts associated with medical waste incineration (e.g., dioxin emissions). However, CSMC has replaced the incinerator with two steam sterilizers. The steam sterilizers dispose of medical waste without generating dioxin emissions.[41] As such, the Project would not release substantial amounts of TACs, and no significant impact on human health would occur.

Compared to the Original EIR, which concluded that the Master Plan would have a significant adverse impact related to TACs, even after compliance with federal, state and local regulations, the net incremental impact of the Project would be insignificant and the overall impact is similar to that already addressed in the Original EIR. Overall the Master Plan impacts remain significant.

(d) Odor Impacts

According to the SCAQMD Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The Project Site would be developed with hospital uses, not land uses that are typically associated with odor complaints. On-site trash receptacles would have the potential to create adverse odors. As trash receptacles would be located and maintained in a manner that promotes odor control, no adverse odor impacts are anticipated from these types of land uses. In addition, the Project would comply with regulations contained in SCAQMD Rule 402 (Nuisance). As such, operational odors would result in a less than significant impact.

Operational odor impacts discussed in the Original EIR were associated with the operation of an on-site waste incinerator to be located west of Sherbourne Drive, between Alden Drive and Third Street. According to the Original EIR, the waste incinerator would not violate the SCAQMD limit of 1,000 pounds per hour of waste. The portion of the original project analyzed in this air quality analysis does not include a waste incinerator.

(e) Consistency with Adopted Plans and Policies

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's *CEQA Air Quality Handbook*. The AQMP establishes goals and policies to reduce long-term emissions in the Basin. Thus, this analysis focuses on long-term operational emissions. There are two key indicators of consistency. These indicators are discussed below.

[41] Health Care Without Harm, *Toolkit 7, Alternatives to Medical Waste Incineration: Stopping the Toxic Threat*, 2002.

- **Consistency Criterion No. 1**: *The Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.*

  Consistency Criterion No. 1 refers to violations of the CAAQS. Operational CO emissions were used for assessing local area air quality impacts because CO is primarily emitted by motor vehicles, and it does not readily react with other pollutants.[42] In addition, as shown in *Table 11: Estimated Daily Operational Regional Emissions*, mobile CO emissions would account for the majority of operational emissions. As such, CO was utilized as an indicator for AQMP consistency. Based on methodologies set forth by SCAQMD, one measure to determine whether the Project would cause or contribute to a violation of an air quality standard would be based on the estimated CO concentrations at intersections that would be affected by the Project.[43] The CO hotspot analysis indicates that the Project would not result in an exceedance of the State one- and eight-hour CO concentration standards. In addition, the proposed project would not result in long-term significant VOC, NO_X, SO_X, $PM_{2.5}$, or PM_{10} impact. As such, the proposed project would not impede attainment of the CAAQS and would comply with Consistency Criterion No. 1.

- **Consistency Criterion No. 2**: *The Project will not exceed the assumptions in the AQMP in 2010 or increments based on the year of Project build-out phase.*

  Consistency Criterion No. 2 requires an assessment of whether the Project would exceed the assumptions in the AQMP. A project is considered to be consistent with the AQMP if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP.[44] The 2007 AQMP uses SCAG's forecasts on population and employment. The most recent SCAG Regional Transportation Plan ("RTP") published at the time the 2007 AQMP was completed was the 2004 RTP.[45,46] The 2004 RTP is based on growth assumptions through 2030 developed by each of the cities and counties in the SCAG region.

  SCAG locates the Project Site within the Los Angeles City subregion. The Project would not include new housing and, as such, would be consistent with the RTP housing and population growth assumptions. The Project, which would add 660 employees, represents less than one percent of the 278,264 new employees projected in SCAG's RTP between 2007 and 2023 for the Los Angeles City subregion.[47] Such levels of employment growth are within employment growth forecasts for the subregion as adopted by SCAG. In addition, operations of the Project would not

[42] SCAQMD, *CEQA Air Quality Handbook*, 1993.
[43] *Ibid*.
[44] SCAQMD, *CEQA Air Quality Handbook*, 1993.
[45] SCAQMD, *Final Socioeconomic Report for the 2007 AQMP*, Page C-1, June 2007.
[46] SCAG, *2004 Regional Transportation Plan: Destination 2030* http://www.scag.ca.gov/rtp2004/2004/finalplan.htm (April 2004).
[47] Provided by the Project Applicant, Cedars-Sinai Medical Center.

exceed the SCAQMD thresholds or the State one- and eight-hour CO standards. Thus, the Project is consistent with growth assumptions included in the AQMP, and the Project would comply with Consistency Criterion No. 2.

The Project complies with Consistency Criteria No. 1 and No. 2. Therefore, the Project is consistent with the AQMP.

(f) Climate Change Gas Emissions

The SCAQMD, State, and federal agencies have not developed methodology to ascertain project-level impacts on global warming and climate change based on a project's net increase in GHGs over existing levels. Additionally, no significance thresholds have as yet been established to determine specific project effects.

Worldwide population growth and the consequent use of energy is the primary reason for GHG emission increases. The market demand for goods and services and the use of land is directly linked to population changes and economic development trends within large geographies (e.g., regional, Statewide, national, worldwide). Individual site-specific projects have a negligible effect on these macro population-driven and growth demand factors. Whether an individual site-specific project is constructed or not has little effect on GHG emissions. This is because the demand for goods and services in question would be provided in some other location to satisfy the demands of a growing population if not provided on the Project Site. The only exception to this basic relationship between population growth, development, energy consumption and GHG emissions would occur if the site-specific project (1) embodied features that were not typical of urban environment or developing communities, and (2) generated a disproportionate amount of vehicle miles of travel or had other unique and disproportionately high fuel consumption characteristics. The Project does not fall within these exceptions. It is a typical infill development project located in an urban area. As such, the Project would have a negligible, and less than significant, effect on any increase in regional and national GHG emissions.

GHG emissions were not discussed in the Original EIR; however, *Table 13: Estimated Annual Greenhouse Gas Emissions* shows the net carbon equivalent values associated with the Project uses. GHG emissions were calculated from mobile sources, natural gas usage, and electricity generation. As shown on *Table 13: Estimated Annual Greenhouse Gas Emissions*, the Project would result in carbon equivalent emissions of 5,851 tons per year of CO_2, 6 tons per year of CH_4, and 36 tons per year of NO_2 per year.

TABLE 13
ESTIMATED ANNUAL GREENHOUSE GAS EMISSIONS [1]

	CARBON EQUIVALENT (TONS PER YEAR)		
SCENARIO	**CO_2**[2]	**CH_4**[3]	**N_2O**[3]
Mobile Emissions	2,187	2	29
Natural Gas Consumption Emissions	14	3	1
Electricity Consumption Emissions	3,785	1	6
Total Emissions	**5986**	**6**	**36**

TABLE 13
ESTIMATED ANNUAL GREENHOUSE GAS EMISSIONS [1]

SCENARIO	CARBON EQUIVALENT (TONS PER YEAR)		
	CO_2[2]	CH_4[3]	N_2O[3]

[1] Source: Terry A Hayes Associates LLC, *Cedars-Sinai Medical Center Project Air Quality and Noise Impact Report*, August 2008.
[2] Mobile and natural gas emissions were obtained from URBEMIS2007. Electricity emissions were obtained from *California Climate Action Registry General Reporting Protocol (March 2007)*.
[3] Emissions were obtained from *California Climate Action Registry General Reporting Protocol (March 2007)*.

d. Cumulative Impacts

The SCAQMD has set forth both a methodological framework, as well as significance thresholds, for the assessment of a project's cumulative air quality impacts.[48] SCAQMD's approach is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. In turn, the 2007 AQMP is based on SCAG's forecasted future regional growth. As such, the analysis of cumulative impacts focuses on determining whether the Project is consistent with forecasted future regional growth.

Based on SCAQMD's methodology, a project would have a significant cumulative air quality impact if the ratio of daily project-related vehicle miles traveled ("VMT") to daily countywide vehicle miles traveled exceeds the ratio of project-related employment to countywide employment.[49] As shown in *Table 14: Cumulative Air Quality Analysis*, the Project-related VMT to countywide VMT ratio does not exceed the Project-related employment to countywide employment ratio. The Project would not significantly contribute to cumulative emissions and would have a less than significant impact.

A localized CO impact analysis was also completed for cumulative traffic (i.e., Related Projects and ambient growth through 2023). When calculating future traffic impacts, the traffic consultant took 141 additional projects into consideration.[50] Thus, the future traffic results already account for the cumulative impacts from these other projects. As shown in *Table 12: Carbon Monoxide Concentrations*, the Project with cumulative traffic would not violate CO standards at local intersections. As such, the Project would not contribute to cumulative air quality impacts.

TABLE 14
CUMULATIVE AIR QUALITY ANALYSIS [1]

DAILY VEHICLE MILES	
Daily Vehicle Miles Traveled For Project Employment [2]	11,589
Daily Vehicle Miles Traveled Countywide [3]	239,765,000
Daily Vehicle Miles Traveled Ratio	**0.000048**
Project Employment [4]	606
Countywide Employment [5]	5,458,829

[48] SCAQMD, *CEQA Air Quality Handbook*, 1993.
[49] *Ibid*.
[50] Linscott, Law & Greenspan, Engineers, *Traffic Impact Study Cedars-Sinai Medical Center Project*, June 23, 2008.

TABLE 14 (CONTINUED)
CUMULATIVE AIR QUALITY ANALYSIS [1]

DAILY VEHICLE MILES	
Employment Ratio	**0.000111**
Significance Test **Daily Vehicle Miles Traveled Ratio Greater Than Employment Ratio**	**No**

[1] Source: Terry A Hayes Associates LLC, *Cedars-Sinai Medical Center Project Air Quality and Noise Impact Report*, August 2008.
[2] Data obtained from URBEMIS 2007.
[3] Data obtained from EMFAC2007.
[4] Provided by the Project Applicant.
[5] Data obtained from SCAG's Regional Transportation Plan, Socioeconomic Projections, 2004.

CEQA Guidelines Section 15130(b)(5)(c) states that with "some projects, the only feasible mitigation for cumulative impacts may involve the adoption of ordinances or regulations rather than the imposition of conditions on a project-by-project basis." The assessment and mitigation of cumulative impacts as they relate to global climate change fall into this category since the causes and effects are worldwide. Accordingly, the only feasible mitigation to address issues related to global warming will be CARB's adoption of regulations and thresholds pursuant to AB 32, which will be implemented by local air quality management agencies (e.g., SCAQMD), to limit GHG emissions in the State. By law, the Project would be required to comply with all AB 32-related regulations. Based on the Project analysis above, cumulative impacts related to global warming would be considered less than significant.

The cumulative impact analysis in the Original EIR is different from the cumulative impact analysis for the Project. The cumulative impact analysis in the Original EIR estimated mobile emissions from 87 Related Projects within the City of Los Angeles, West Hollywood, and Beverly Hills. The Original EIR found that the Master Plan would account for 11.7 percent of the cumulative emissions for ROG, 10.4 percent of the cumulative emissions for CO, and 13.0 percent of the cumulative emissions for NO_X.

4. MITIGATION PROGRAM

a. Regulatory Requirements, Standard Conditions, and Project Design Features

MM AQ-1: The Project will comply with applicable CARB regulations and standards. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county levels.

MM AQ-2: The Project will comply with applicable SCAQMD regulations and standards. The SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards in the District. Programs that were developed include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting

requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

MM AQ-3: The Project will be designed to reduce exposure of sensitive receptors to excessive levels of air quality. Also, the Project will incorporate many "sustainable" or "green" strategies that target sustainable site development, water savings, energy efficiency, green-oriented materials selection, and improved indoor environmental quality, which in turn serve to directly and proactively reduce GHG and other air pollutant emissions. Project Design Features to be incorporated by the Project shall include, but are not limited to, the following or their equivalent:

- The CSMC Campus, including the Project Site, is conveniently located with respect to public transit opportunities. Given the Project Site's location within an established urban area, access to a number of existing Los Angeles Metro bus lines is available, and a potential Metro Rail station at the northeast corner of the CSMC Campus may be available in the future, thereby reducing traffic, air quality, noise, and energy effects.

- 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.

- The West Tower design incorporates light-colored roofing and paving materials, which serve to reduce unwanted heat absorption and minimize energy consumption.

- Building materials and new equipment associated with the West Tower are selected to avoid materials that might incorporate atmosphere-damaging chemicals.

- The West Tower energy performance is designed to be 14% more effective than required by California Title 24 Energy Design Standards, thereby reducing energy use, air pollutant emissions and greenhouse gas emissions.

- The West Tower will generate 2.5% of the building's total energy use through on-site renewable energy sources. On-site renewable energy sources can include a combination of photovoltaic, wind, hydro, wave, tidal and bio-fuel based electrical production systems, as well as solar thermal and geothermal energy systems.

- The West Tower will use materials with recycled content such that the sum of post-consumer content plus one-half of the pre-consumer content constitutes at least 10% (based on cost) of the total value of the materials in the Project.

- Lighting systems within the West Tower will be controllable to achieve maximum efficiency (e.g., uniform general ambient lighting, augmented with individually controlled task lighting that accommodates user-adjustable lighting levels and automatic shutoff switching).

- The West Tower will be designed to provide occupant thermal comfort dissatisfaction levels above 85%.

b. 1993 Mitigation Measures (Carried Forward)

(1) Construction

MM AQ-4: Haul trucks shall be staged in non-residential areas and called to the site by a radio dispatcher. A Haul Route Permit shall be required before haul truck operations are conducted.

MM AQ-5: Diesel-powered equipment shall be located as far as possible from sensitive receptors.

MM AQ-6: A temporary wall of sufficient height to reduce windblown dust shall be erected on the perimeter of the construction site.

MM AQ-7: Ground wetting shall be required during grading and construction, pursuant to SCAQMD Rule 403. This measure can reduce windblown dust a maximum of 50 percent.

MM AQ-8: Contractors shall cover stockpiles of soil, sand, and similar materials to reduce wind pick-up.

MM AQ-9: Construction equipment shall be shut off to reduce idling for extended periods of time when not in use.

MM AQ-10: Low sulfur fuel should be used to power construction equipment.

MM AQ-11: Construction activities shall be discontinued during second stage smog alerts.

(2) Long-Term Operational

MM AQ-12: The proposed project shall implement a Transportation Demand Management program consistent with the provisions of SCAQMD Regulation XV.

MM AQ-13: The Medical Center should reduce, to the extent possible, its reliance on hazardous materials.

MM AQ-14: The Medical Center should analyze the effect of stack design and exhaust velocity on the dispersion of air toxics.

MM AQ-15: New exhaust systems should be designed to place vents at or above the roof level of nearby buildings.

(3) Energy Conservation Measures that Reduce Air Pollutant Emissions

MM AQ-16: Conservation with the Los Angeles Department of Water and Power and [The Gas Company] to determine feasible energy conservation features that could be incorporated into the design of the proposed project.

MM AQ-17: Compliance with Title 24, established by the California Energy Commission regarding energy conservation standards. Those standards relate to insulation requirements and the use of caulking, double-glazed windows, and weather stripping.

MM AQ-18: Thermal insulation which meets or exceeds standards established by the State of California and the Department of Building and Safety should be installed in walls and ceilings.

MM AQ-19: Tinted or solar reflected glass would be used on appropriate exposures.

MM AQ-20: Heat-reflecting glass on the exterior-facing, most solar-exposed sides of the building, should be used to reduce cooling loads.

MM AQ-21: Interior and exterior fluorescent [halogen, or other energy efficient type] lighting should be used in place of less efficient incandescent lighting.

MM AQ-22: A variable air volume system which reduces energy consumption for air cooling and heating for water heating should be used where permitted.

MM AQ-23: Air conditioning which will have a 100 percent outdoor air economizer cycle to obtain free cooling during dry outdoor climatic periods should be used.

MM AQ-24: Lighting switches should be equipped with multi-switch provisions for control by occupants and building personnel to permit optimum energy use.

MM AQ-25: Public area lighting, both interior and exterior, should be used, time controlled, and limited to that necessary for safety.

MM AQ-26: Department of Water and Power recommendations on the energy efficiency ratios of all air conditioning equipment installed should be followed.

MM AQ-27: A carefully established and closely monitored construction schedule should be used to coordinate construction equipment movements, thus minimizing the total number of pieces of equipment and their daily movements. This would reduce fuel consumption to a minimum.

c. Recommended Additional Mitigation Measures

(1) Construction

MM AQ-28: Water or a stabilizing agent shall be applied to exposed surfaces in sufficient quantity to prevent generation of dust plumes.

MM AQ-29: Track-out shall not extend 25 feet or more from an active operation, and track-out shall be removed at the conclusion of each workday.

MM AQ-30: A wheel washing system shall be installed and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site.

MM AQ-31: All haul trucks hauling soil, sand, and other loose materials shall maintain at least six inches of freeboard in accordance with California Vehicle Code Section 23114.

MM AQ-32: All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).

MM AQ-33: Traffic speeds on unpaved roads shall be limited to 15 miles per hour.

MM AQ-34: Operations on unpaved surfaces shall be suspended when winds exceed 25 miles per hour.

MM AQ-35: Heavy equipment operations shall be suspended during first and second stage smog alerts.

MM AQ-36: On-site stockpiles of debris, dirt, or rusty materials shall be covered or watered at least twice per day.

MM AQ-37: Contractors shall utilize electricity from power poles rather than temporary diesel or gasoline generators, as feasible.

MM AQ-38: Architectural coating shall have a low VOC content, per SCAQMD guidance.

MM AQ-39: Prior to issuance of demolition permits, an asbestos and lead-based paint survey shall be conducted. If ACMs are detected, these materials shall be removed by a licensed abatement contractor and in accordance with all applicable federal, State, and local regulations, including SCAQMD Rule 1403 prior to demolition. If lead-based paint is identified, federal and State construction worker health and safety regulations (including applicable CalOSHA and USEPA regulations) shall be followed during demolition activities. Lead-based paint shall be removed by a qualified lead abatement contractor and disposed of in accordance with existing hazardous waste regulations. If lead-based paint is identified on the building structure to be demolished, near-surface soil samples shall be collected around the

structure to determine the potential for residual soil lead contamination, and appropriate remediation shall be completed prior to building construction.

(2) Long-Term Operational

Operational air quality impacts would be less than significant with the implementation of applicable standards and regulations, and implementation of the applicable mitigation measures adopted in connection with the Original EIR. Hence, no additional mitigation measures are required.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

Implementation of the standard conditions of approval, project design features, and previously adopted mitigation measures (listed above) would reduce all air quality impacts, except for construction-phase impacts, to less than significant levels.

Implementation of the mitigation measures would ensure that fugitive dust emissions would be reduced by approximately 61 percent, thereby reducing daily $PM_{2.5}$ and PM_{10} emissions, and that NO_X emissions from heavy-duty construction equipment would be reduced by 40 percent. Implementation of the mitigation measures would also reduce VOC from architectural coating by 10 percent. With implementation of the recommended Mitigation Measures, regional construction emissions of VOC, CO, SO_X, $PM_{2.5}$ and PM_{10} would be less than the SCAQMD significance thresholds. However, a significant and unavoidable regional NO_X impact would occur. Localized construction emissions of NO_X and CO would be less than the localized significance thresholds. However, a significant and unavoidable localized $PM_{2.5}$ and PM_{10} impact would occur. Implementation of the mitigation program would ensure proper removal of ACMs and lead-based paint, thus reducing impacts associated with TACs to less than significant levels.

The Project will result in a net significant unavoidable impacts related to construction (short-term) air quality impacts related to NO_X, PM_{10} and $PM_{2.5}$. Pursuant to CEQA Guidelines Sections 15092 and 15093, and in the event the Project is approved, the City of Los Angeles must adopt a Statement of Overriding Considerations acknowledging these outstanding significant adverse impacts and stating the reason(s) for accepting these impacts in light of the whole environmental record as weighed against the benefits of the Project.

Compared to the Original EIR, which concluded that development of the Master Plan would result in an adverse impact by increasing mobile-source and TAC emissions, the net incremental impact of the Project would be insignificant and the overall impact is similar to that already analyzed in the Original EIR. Even though the net incremental increase would be insignificant, the overall Project impact remains significant for the reasons discussed above.

IV. ENVIRONMENTAL IMPACT ANALYSIS

C. NOISE

1. INTRODUCTION

The following analysis of noise impacts is based primarily upon the *Cedars-Sinai Medical Center Project Air Quality and Noise Impact Report*, prepared by Terry A. Hayes Associates, dated August 2008, and incorporated fully herein. The noise report, including the applicable noise calculation sheets are provided in *Appendix D: Air Quality and Noise* of this Draft SEIR. In addition, the analysis includes conclusions previously reached in the Original EIR regarding noise impacts.

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

The following discussion focuses on providing noise and ground-borne vibration background information. In addition, existing noise and ground-borne conditions are characterized.

(1) Characteristics of Sound

Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The "A-weighted scale," abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA.[1] *Figure 28: A-Weighted Noise Levels* provides examples of A-weighted noise levels from common sounds.

In general, there are two types of noise sources: (1) point sources, such as stationary equipment or individual motor vehicles; and (2) line sources, such as a roadway with a large number of point sources (motor vehicles).

(a) Noise

This noise analysis discusses sound levels in terms of Community Noise Equivalent Level (CNEL) and Equivalent Noise Level (L_{eq}).

Community Noise Equivalent Level. CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Humans perceive sound between 7:00 p.m. and 10:00 p.m. as if the sound were actually 5 decibels higher than if it occurred from 7:00 a.m. to 7:00 p.m. From 10:00 p.m. to 7:00 a.m., humans perceive sound as if it were 10 dBA higher due to the lower background level. Hence, the CNEL is obtained by adding an

[1]City of Los Angeles, *LA CEQA Thresholds Guide*, 2006.

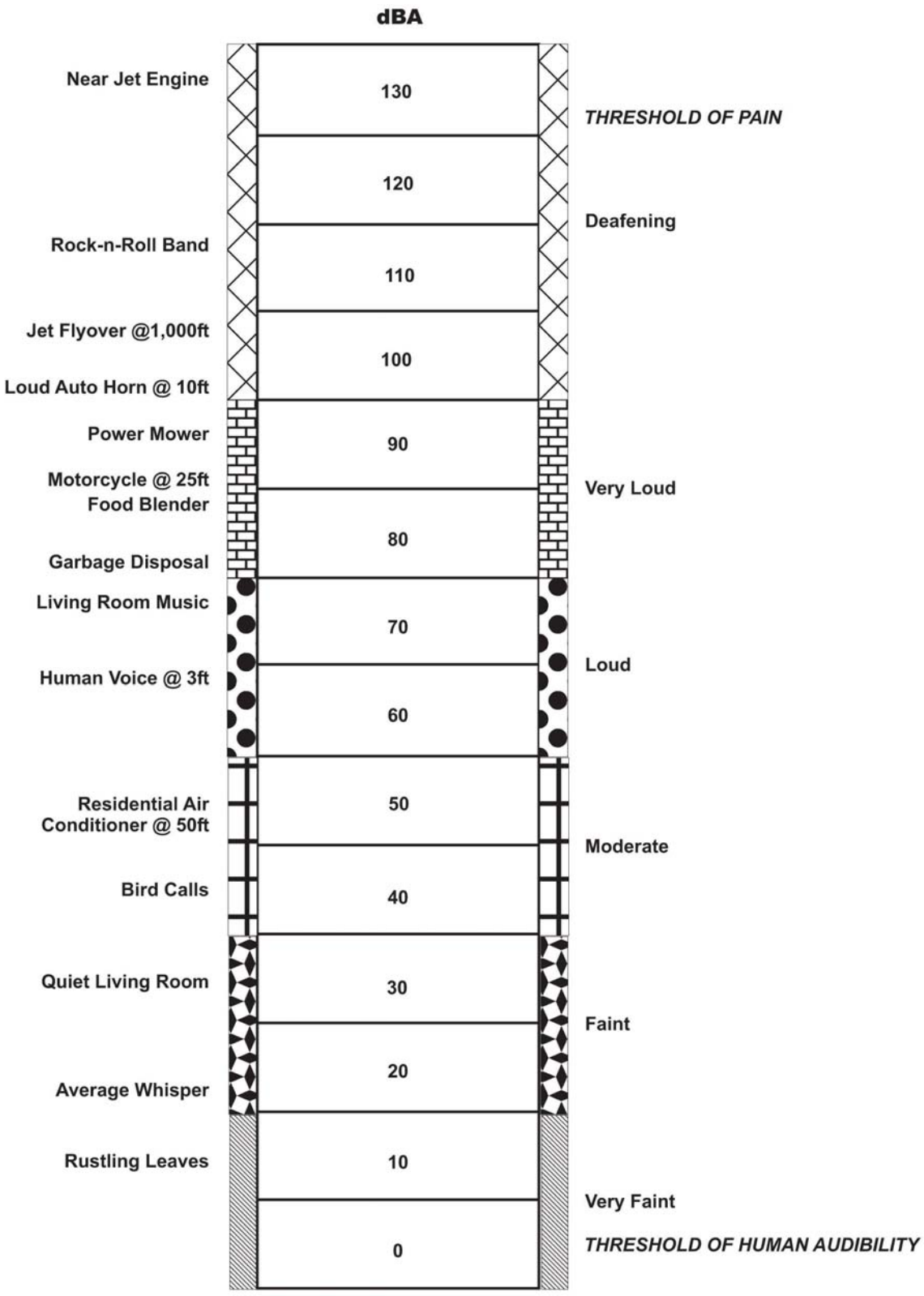


FIGURE 28
A-WEIGHTED NOISE LEVELS

SOURCE: COWAN, JAMES P.,
HANDBOOK OF ENVIRONMENTAL ACOUSTICS

additional 5 decibels to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels in the night before 7:00 a.m. and after 10:00 p.m. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour average.

Equivalent Noise Level. L_{eq} is the average A-weighted sound (i.e., adjusted to sensitivity range of typical human ear) level measured over a given time interval. L_{eq} can be measured over any time period, but is typically measured for 1-minute, 15-minute, or 1-hour periods. L_{eq} is expressed in dBA.

(i) Effects of Noise

Noise is generally defined as unwanted sound. The degree to which noise can impact the human environment ranges from levels that interfere with speech and sleep (annoyance and nuisance) to levels that cause adverse health effects (hearing loss and psychological effects). Human response to noise is subjective and can vary greatly from person to person. Factors that influence individual responses include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

Audible Noise Changes

Studies have shown that the smallest perceptible change in sound level for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and would likely evoke a community reaction. A 10-dBA increase is subjectively heard as a doubling in loudness.[2]

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or "point source," (e.g., mechanical equipment or loading docks) will decrease by approximately 6 dBA over hard surfaces and 7.5 dBA over soft surfaces for each doubling of the distance.[3] For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, then the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Sound generated by a line source typically attenuates (i.e., becomes less) at a rate of 3.0 dBA and 4.5 dBA per doubling of distance from the source to the receptor for hard and soft sites, respectively.[4]

Generally, noise is most audible when traveling by direct line-of-sight[5]. Barriers, such as walls, berms, or buildings, that break the line-of-sight between the source and the receiver, as well as elevational differences, greatly reduce noise levels from the source since sound can only reach the receiver by bending over the top of the barrier (diffraction). Sound barriers can reduce sound

[2]Caltrans, *Technical Noise Supplement*, 1998, pp. 16-18, 41-43.
[3]Caltrans, *Technical Noise Supplement*, 1998, pp. 24-29. Examples of acoustically "hard" or reflective sites include asphalt, concrete, and hard and sparsely vegetated soils. Examples of acoustically "soft" or absorptive sites include soft sand, plowed farmland, grass, crops, heavy ground cover, etc.
[4]Caltrans, *Technical Noise Supplement*, 1998, pp. 24-29.
[5] Line-of-sight is an unobstructed visual path between the noise source and the noise receptor.

levels by up to 20 dBA. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced. In situations where the source or the receiver is located three meters (approximately 9.84 feet) above the ground, or whenever the line-of-sight averages more than three meters above the ground, sound levels would be reduced by approximately three decibels for each doubling of distance.[6]

(b) Ground-borne Vibration

(i) Characteristics of Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. In contrast to noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as blasting, pile driving, and heavy earth-moving equipment.

(ii) Measurement of Vibration

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings. The root mean square (RMS) amplitude is most frequently used to describe the affect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (Vdb) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration.[7]

(iii) Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, in general, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of ground-borne vibration may damage fragile buildings or interfere with equipment that is highly sensitive to ground-borne vibration (e.g., electron microscopes).

To counter the effects of ground-borne vibration, the Federal Railway Administration (FRA) has published guidance relative to vibration impacts. According to the FRA, fragile buildings can be exposed to ground-borne vibration levels of 0.5 PPV without experiencing structural damage.[8]

In contrast to noise, ground-borne vibration is not a phenomenon that most people experience every day. The background vibration velocity level in residential areas is usually 50 RMS or

[6]Caltrans, *Technical Noise Supplement*, 1998, pp. 33-40, 123-131.
[7] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, April 1995.
[8] Federal Railway Administration, High-Speed Ground Transportation Noise and Vibration Impact Assessment, December 1998.

lower, well below the threshold of perception for humans, which is around 65 RMS.[9] Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible.

(2) Existing Local Noise Conditions

The existing noise environment of the Project area is characterized by vehicular traffic and noises typical to a dense urban area (e.g., people conversing). Vehicular traffic is the primary source of noise in the Project vicinity.

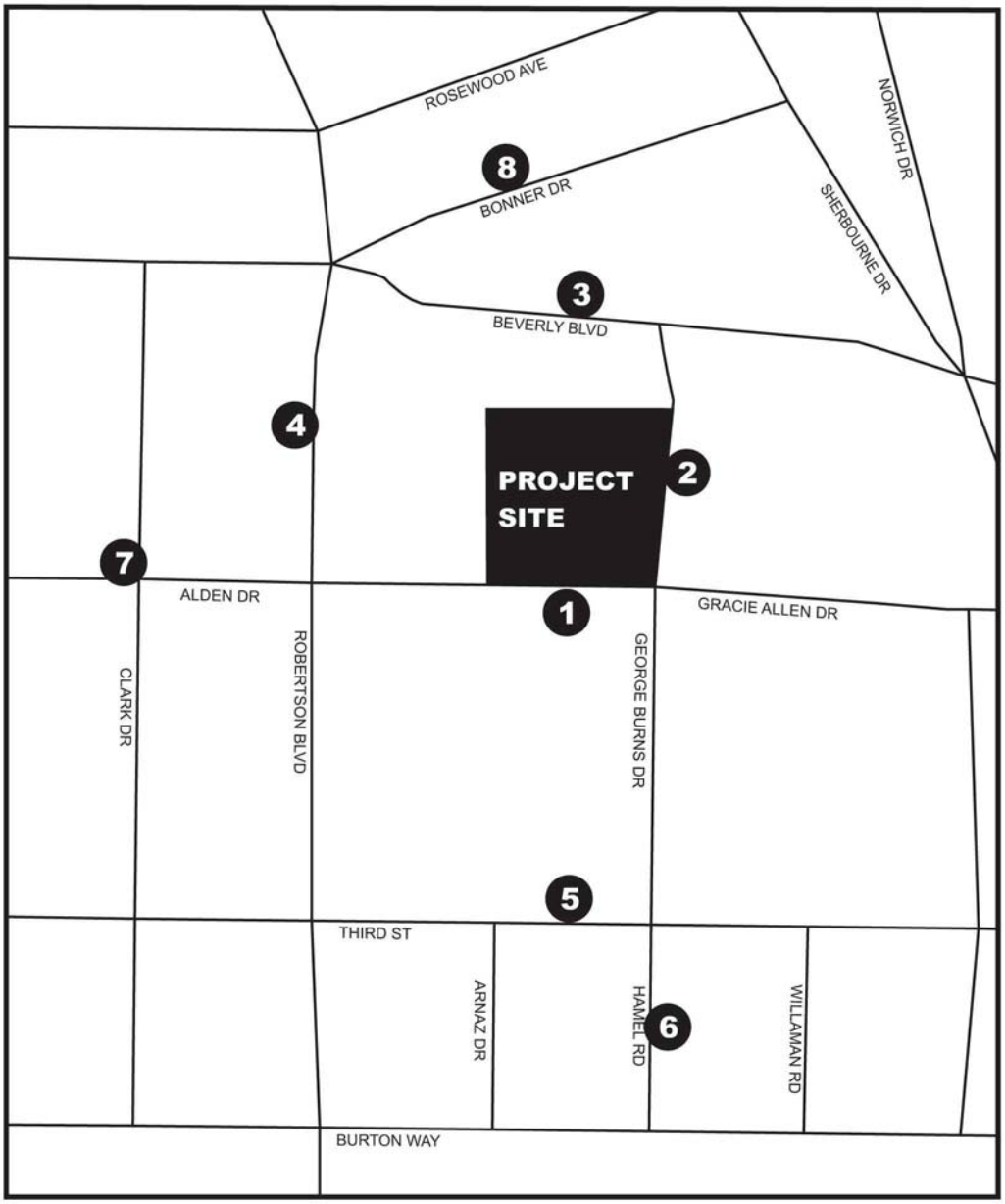
(a) Ambient Noise Levels

Sound measurements were taken using a Quest Q-400 Noise Dosimeter between 8:00 a.m. and 12:20 p.m. on August 7 and August 8, 2007, to ascertain existing ambient exterior daytime noise levels in the Project vicinity. These readings were used to establish existing ambient exterior noise conditions and to provide a baseline for evaluating noise impacts. Noise monitoring locations are shown in *Figure 29: Noise Monitoring Positions*. As shown in *Table 15: Existing Noise Levels*, existing ambient sound levels range between 60.2 and 72.4 dBA (L_{eq}). Based on the Noise Element of the City of Los Angeles General Plan (see Section IV.C.2.b below),[10] existing noise levels at nearby residential, commercial and medical uses are within the "conditionally acceptable" range. The conditionally acceptable noise levels for residential uses range from 55 to 70 dBA (low density, single-family, and duplexes) and from 60 to 70 dBA (multi-family), those for medical uses range from 60 to 70 dBA (hospitals) and from 67.5 to 77.5 dBA (professional offices), and those for commercial uses range from 67.5 to 77.5 dBA. No existing noise levels fall within the "normally unacceptable" range.

TABLE 15
EXISTING NOISE LEVELS [1]

KEY TO *FIGURE 29: NOISEMONITORING POSITIONS*	NOISE MONITORING LOCATION	SOUND LEVEL (DBA, LEQ)
1	Alden Drive-Gracie Allen Drive, South of Project Site (Commercial Uses)	65.8
2	George Burns Road, East of Project Site (Medical Uses)	65.2
3	Beverly Boulevard, North of Project Site (Commercial Uses)	70.5
4	Robertson Boulevard, West of Project Site (Commercial Uses)	72.4
5	Third Street, South of Project Site (Commercial Uses)	71.5
6	Hamel Road, Southeast of Project Site (Residential)	60.2
7	Clark Drive/Alden Drive-Gracie Allen, West of Project Site (Residential)	61.1

[9] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, April 1995.
[10] City of Los Angeles, *Noise Element of the Los Angeles City General Plan*, 1999.



LEGEND: Project Site

Noise Monitoring Locations

1. South of Project Site
2. Cedar-Sinai Medical Towers
3. Medical Offices
4. Commercial Uses
5. Commercial Uses
6. Multi-Family Residences
7. Multi-Family Residences
8. Single-family Residences

FIGURE 29
NOISE MONITORING POSITIONS

SOURCE: TERRY A. HAYES AND ASSOCIATES

NORTH

TABLE 15 (CONTINUED)
EXISTING NOISE LEVELS [1]

KEY TO *FIGURE 29: NOISEMONITORING POSITIONS*	NOISE MONITORING LOCATION	SOUND LEVEL (DBA, LEQ)
8	Bonner Drive, North of Project Site (Residential)	55.4
[1] Source: Terry A. Hayes Associates LLC, *Cedars-Sinai Medical Center Project Air Quality and Noise Impact Report*, March 2008.		

(b) Roadway Noise

As stated earlier, vehicular traffic is the predominant noise source in the Project vicinity. Using existing traffic volumes provided by the Project traffic consultant and the Federal Highway Administration (FHWA) RD-77-108 noise calculation formulas, CNEL was calculated for various roadway segments that would be most affected by the Project. *Table 16: Existing Estimated Community Noise Equivalent Level* presents the existing mobile noise levels at the affected roadway segments, as well as the land uses adjacent to the analyzed roadway segments. As shown in *Table 16: Existing Estimated Community Noise Equivalent Level,* existing mobile noise levels in the Project area range from 64.0 to 72.9 dBA (CNEL). Modeled vehicle noise levels are typically lower than the noise measurements along similar roadway segments as modeled noise levels do not take into account additional noise sources (e.g., pedestrians).

TABLE 16
EXISTING ESTIMATED COMMUNITY NOISE EQUIVALENT LEVEL [1][2]

ROADWAY SEGMENT (ADJACENT USES)	ESTIMATED CNEL DBA [3]
Beverly Boulevard from Robertson Boulevard to George Burns Road (Commercial and Single-family uses)	71.9
Beverly Boulevard from George Burns Road to San Vicente Boulevard (Commercial uses)	71.9
Beverly Boulevard from San Vicente Boulevard to La Cienega Boulevard (Commercial uses)	72.9
Robertson Boulevard from Beverly Boulevard to Alden Drive-Gracie Allen Drive (Commercial uses)	69.8
Robertson Boulevard from Alden Drive-Gracie Allen Drive to Third Street (Commercial uses)	66.7
George Burns Road from Beverly Boulevard to Alden Drive-Gracie Allen Drive (Medical uses)	67.0
George Burns Road from Alden Drive-Gracie Allen Drive to Third Street (Medical uses)	67.6
Alden Drive-Gracie Allen Drive from Robertson Boulevard to George Burns Road (Medical uses)	65.2
Third Street from Robertson Boulevard to George Burns Road (Medical and Commercial uses)	65.7
Third Street from George Burns Road to Sherbourne Drive (Medical and Commercial uses)	70.5
La Cienega Boulevard from Wilshire Boulevard to Third Street (Residential and Commercial uses)	69.0

[1] Source: Terry A. Hayes Associates LLC, *Cedars-Sinai Medical Center Project Air Quality and Noise Impact Report*, August 2008.
[2] The predicted CNELs were calculated as peak hour Leq and converted into CNEL using the California Department of Transportation Technical Supplement (October 1998). The conversion involved making a correction for peak hour traffic volumes as a percentage of average daily traffic and a nighttime penalty correction. The peak hour traffic was assumed to be ten percent of the average daily traffic.
[3] CNEL is at 50 feet from the roadway right-of-way.

(c) Ambient Vibration Levels

Similar to the environmental setting for noise, the vibration environment is dominated by traffic from nearby roadways. Heavy trucks can generate ground-borne vibrations that vary depending on vehicle type, weight, and pavement conditions. Existing ground-borne vibration in the Project vicinity is largely related to heavy truck traffic on the surrounding roadway network. Based on field observations, vibration levels from adjacent roadways are not perceptible at the Project Site.

(d) Noise-Sensitive Receptors

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise- and vibration-sensitive and may warrant unique measures for protection from intruding noise. As shown in *Figure 30: Sensitive Receptor Locations*, sensitive receptors near the Project Site include the following:

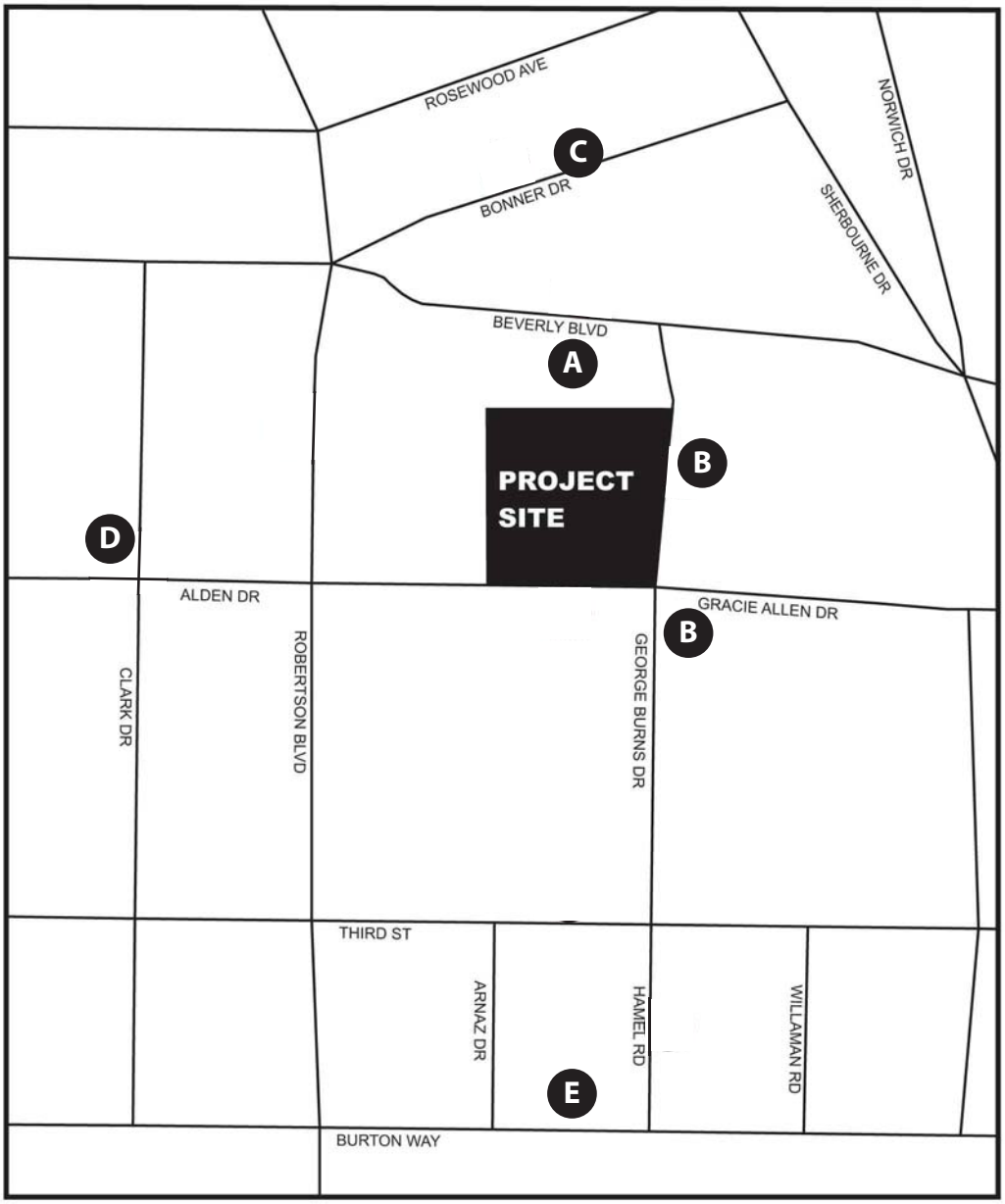
- Medical office building located adjacent and to the north of the Project Site;
- Cedars-Sinai buildings (including the North and South Patient Towers and medical offices) located approximately 50 feet east and southeast of the Project Site;
- Single-family residences located along Bonner Drive approximately 400 feet north of the Project Site;
- Multi-family residences located along Clark Drive approximately 475 feet west of the Project Site; and
- Multi-family residences located along Burton Way approximately 975 feet south of the Project Site.

The above sensitive receptors occupy the nearest residential and medical land uses with the potential to be impacted by the Project. Additional single-family and multi-family residences are located in the surrounding community within one-quarter mile of the Project Site. These land uses would be impacted to a lesser degree than the identified sensitive receptors, as they are farther away from the Project Site.

b. Regulatory and Policy Setting

(1) City of Los Angeles Standards and Guidelines

The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise sensitive land uses. Regarding construction, the Los Angeles Municipal Code (LAMC) indicates that no construction or repair



A Medical office building located adjacent and to the north of the Project Site
B Cedars-Sinai Medical Office Towers (including the hospital) located approximately 50 feet east and southeast of the Project Site
C Single-family residences located along Bonner Drive approximately 400 feet north of the Project Site
D Multi-family residences located along Clark Drive approximately 475 feet west of the Project Site
E Multi-family residences located along Burton Way approximately 975 feet south of the Project Site

FIGURE 30
SENSITIVE RECEPTOR LOCATIONS

SOURCE: TERRY A. HAYES AND ASSOCIATES

NORTH

work shall be performed between the hours of 9:00 p.m. and 7:00 a.m. on weekdays, since such activities would generate loud noises and disturb persons occupying sleeping quarters in any adjacent dwelling, hotel, apartment or other place of residence[11]. No person, other than an individual home owner engaged in the repair or construction of his/her single-family dwelling, shall perform any construction or repair work of any kind or perform such work within 500 feet of land so occupied before 8:00 a.m. or after 6:00 p.m. on any Saturday or on a federal holiday, or at any time on any Sunday.

The LAMC also specifies the maximum noise level of powered equipment.[12] Any powered equipment that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet is prohibited. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

(2) California Noise Standards and Guidelines

The California Office of Noise Control has developed guidelines showing a range of noise standards for various land use categories. Cities within the state, including the City of Los Angeles, have incorporated this compatibility matrix into their General Plan noise elements. This matrix is presented in *Table 17: Land Use Compatibility for Community Noise Environments* and is meant to maintain acceptable noise levels in a community setting based on the type of land use. Noise compatibility by different types of land uses is ranged from "Normally Acceptable" to "Clearly Unacceptable" levels. The guidelines are used by cities within the state to help determine the appropriate land uses that could be located within an existing or anticipated ambient noise level.

TABLE 17
LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENTS [1]

LAND USE CATEGORY	COMMUNITY NOISE EXPOSURE (DBA, CNEL)					
	55	60	65	70	75	80
Residential - Low Density Single-Family, Duplex, Mobile Homes						
Residential - Multi-Family						
Transient Lodging - Motels Hotels						
Schools, Libraries, Churches, Hospitals, Nursing Homes						
Auditoriums, Concert Halls, Amphitheaters						

[11] LAMC, Chapter IV, Article 1, Section 41.40, January 29, 1984 and Chapter XI, Article 2, Section 112.04, August 8, 1996.
[12] LAMC, Chapter XI, Article 2, Section 112.05, August 8, 1996.

TABLE 17 (CONTINUED)
LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENTS [1]

LAND USE CATEGORY	COMMUNITY NOISE EXPOSURE (DBA, CNEL)						
	55	60	65	70	75	80	
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business Commercial and Professional							
Industrial, Manufacturing, Utilities, Agriculture							

Key:

Normally Acceptable

Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Conditionally Acceptable

New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditionally will normally suffice.

Normally Unacceptable

New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable

New construction or development should generally not be undertaken.

[1] Source: California Office of Noise Control, Department of Health Services

c. CSMC Campus Background and 1993 Approvals

The Original EIR evaluated both mobile and stationary noise for both the construction and operational phases of the Master Plan project. The Original EIR concluded overall that temporary noise impacts during construction would be significant, while long-term operational noise impacts would be less than significant.

Specifically, the Original EIR concluded that demolition and construction activities would result in a temporary adverse impact at nearby residences. Even with implementation of the adopted mitigation measures, it was determined that short-term demolition and construction activities would still result in temporary significant increases in noise levels at the apartment building located on the southwest corner of San Vicente Boulevard and Third Street.

Long-term increases in vehicular-based noise due to Master Plan traffic would not be significant and specific mitigation measures were not recommended. The Original EIR concluded that

stationary noise sources, such as mechanical equipment, would result in long-term noise impacts. With implementation of the adopted mitigation measures, however, long-term noise impacts from stationary sources would be less than significant.

3. ENVIRONMENTAL IMPACTS

a. Methodology

The noise measurements that were used to characterize existing ambient exterior daytime noise levels in the Project vicinity were used to assess construction and operational noise impacts. The noise level during the construction period at each receptor location was calculated by (1) making a distance adjustment to the construction source sound level and (2) logarithmically adding the adjusted construction noise source level to the ambient noise level.

To estimate operational noise impacts, the traffic report prepared by Linscott, Law & Greenspan, was used to identify the roadway segments that would be most affected by the Project.[13] The FHWA RD-77-108 noise calculation formulas were used to calculate the CNEL for the affected roadway segments.

The Federal Transit Authority, *Transit Noise and Vibration Impact Assessment* (April 1995) was used to identify the potential vibration sources that are associated with the proposed project and to estimate the potential vibration levels at various distances of the Project Site.

b. Thresholds of Significance

Based on the City of Los Angeles Noise Ordinance (LAMC Chapter XI), the City of Los Angeles *LA CEQA Thresholds Guide* (2006) and the State Land Use Compatibility Matrix (*Table 17: Land Use Compatibility for Community Noise Environments*),[14] a proposed project would result in significant noise impacts if it would generate noise levels in excess of the following thresholds.

Construction Phase Significance Criteria

A significant construction noise impact would result if:

- Construction activity would occur outside of the hours permitted by the City's noise ordinance (i.e., between the hours of 9:00 p.m. and 7:00 a.m. on weekdays, before 8:00 a.m. or after 6:00 p.m. on Saturday, or anytime on Sunday); and
- Construction activity would occur within 500 feet of a residential zone on Saturday unless an after-hours construction permit has been issued by the City. An after-hours permit could be issued by the City for low noise level construction activities (e.g., painting and interior improvements).

[13]Linscott, Law & Greenspan, Engineers, *Traffic Impact Study: Cedars-Sinai Medical Center Project*, June 23, 2008.
[14]California Office of Noise Control, Department of Health Services.

- Construction activity would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use.

Operational Phase Significance Criteria

A significant operational noise impact would result if:

- The proposed project causes the ambient noise level measured at the property line of the affected uses to increase by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" category (Table 4-3) or any 5-dBA or more increase in noise level. As shown in *Table 17: Land Use Compatibility for Community Noise Environments*, "normally unacceptable" ranges from 70 to 75 dBA CNEL for single-family and multi-family residences, and 70 to 80 dBA CNEL for medical uses, which include hospitals and medical offices. "Clearly unacceptable" ranges from 70 to 85 dBA CNEL or greater for single-family and multi-family residences, and 80 dBA CNEL or greater for medical uses.

Ground-borne Vibration Significance Criteria

There are no adopted State or City of Los Angeles ground-borne vibration standards. Based on federal guidelines, the proposed project would result in a significant construction or operational vibration impact if:

- The proposed project would expose buildings to the FRA fragile building damage threshold level of 0.5 PPV.[15]

c. Project Impacts

(1) Construction (Short-Term) Noise

Construction of the Project would result in temporary increases in ambient noise levels in the Project area on an intermittent basis. The increase in noise would likely result in a temporary annoyance to nearby residents during the construction period. Noise levels would fluctuate depending on equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers.

Construction activities require the use of noise-generating equipment, such as jackhammers, pneumatic impact equipment, saws, pile drivers, and tractors. Typical noise levels from various types of equipment that may be used during construction are listed in *Table 18: Noise Levels of Typical Construction Equipment*. The table shows noise levels at distances of 50 and 100 feet from the construction noise source.

[15]Federal Railway Administration, *High-Speed Ground Transportation Noise and Vibration Impact Assessment*, December 1998.

TABLE 18
NOISE LEVELS OF TYPICAL CONSTRUCTION EQUIPMENT [1]

NOISE SOURCE	Noise Level (dBA) at 50 feet
Front Loader	73-86
Trucks	82-95
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Saws	72-82
Pneumatic Impact Equipment	83-88
Jackhammers	81-98
Concrete Pumps	81-85
Generators	71-83
Compressors	75-87
Concrete Mixers	75-88
Backhoe	73-95
Pile Driving (peaks)	95-107
Tractor	77-98
Scraper/Grader	80-93
Paver	85-88
Caisson Drilling	84

Source: USEPA, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, PB 206717, 1971; Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, FTA-VA-90-1003-06, May 2006

Whereas *Table 18: Noise Levels of Typical Common Construction Equipment* shows the noise level of each equipment, the noise levels shown in *Table 19: Outdoor Construction Noise Levels* take into account the likelihood that more than one piece of construction equipment would be in operation at the same time and lists the typical overall noise levels that would be expected for each phase of construction. These noise levels are based on surveys conducted by the USEPA in the early 1970s. Since 1970, regulations have been enforced to improve noise generated by certain types of construction equipment to meet worker noise exposure standards. However, many older pieces of equipment are still in use. Thus, the construction phase noise levels indicated in *Table 19: Outdoor Construction Noise Levels* represent worst-case conditions. As the table shows, the highest noise levels are expected to occur during the grading/excavation and finishing phases of construction. The noise source is assumed to be active for 40 percent of the eight-hour workday (consistent with the EPA studies of construction noise), generating a noise level of 89 dBA at a reference distance of 50 feet.

TABLE 19
OUTDOOR CONSTRUCTION NOISE LEVELS [1]

CONSTRUCTION PHASE	NOISE LEVEL AT 50 FEET (DBA)
Ground Clearing	84
Excavation	89
Foundations	78
Erection	85

TABLE 19 (CONTINUED)
OUTDOOR CONSTRUCTION NOISE LEVELS [1]

CONSTRUCTION PHASE	NOISE LEVEL AT 50 FEET (DBA)
Finishing	89
[1] Source: Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717 1971.	

The noise level during the construction period at each receptor location was calculated by (1) making a distance adjustment to the construction source sound level and (2) logarithmically adding the adjusted construction noise source level to the ambient noise level. The estimated construction noise levels at sensitive receptors are shown in *Table 20: Construction Noise Impact-Unmitigated*. The construction noise levels presented in *Table 20: Construction Noise Impact-Unmitigated* are applicable to the additional 200,000 square feet, the demolition and construction of the 90,000 square feet of floor area from the Existing Building, and the 170,650 square-foot addition that is entitled under the Master Plan. The Project would be required to implement the mitigation measures that were adopted in connection with the approval of the Master Plan. These mitigation measures are listed in the Mitigation Program below.

As shown in *Table 20: Construction Noise Impact-Unmitigated*, construction activity would potentially increase ambient exterior noise levels at sensitive receptors by 4.8 to 23.8 dBA L_{eq}, respectively. Typical building construction provides a noise reduction of approximately 12 dBA with windows open and a minimum 26 dBA with windows closed.[16] The adjacent medical offices and hospitals do not have operating windows. As such, interior noise levels at the adjacent medical offices and hospital would be approximately 63 dBA. At the nearest residential use to the Project Site (single-family residences on Bonner Drive, north of the Project Site) the interior noise levels would be approximately 59 dBA with windows open and 45 dBA with windows closed. It is important to note that construction activity would occur intermittently during the day and would not occur within noise sensitive hours (9:00 p.m. to 7:00 a.m.).

The Project would include excavation for the Project parking structure. The excavated area would serve as a noise barrier to street-level sensitive receptors as the depth of excavation increases because noise levels are directly related to the "line-of-sight" or visibility factor of the noise source. For example, depending on the location of the sensitive receptors in relation to the excavated area, when 15 feet of excavation has occurred, construction activities within the excavated area may not be visible (and hence less audible) to street-level sensitive receptors. In addition, once the structural framing and the exterior building walls have been completed, the majority of construction activity would take place within the structure and would not substantially increase interior noise levels at sensitive receptors.

[16]American Society for Testing of Materials, *Standard Classification for Determination of Outdoor-Indoor Transmission Class*, 2003.

TABLE 20
CONSTRUCTION NOISE LEVELS – UNMITIGATED [1]

KEY TO *FIGURE 29: NOISE MONITORING POSITIONS*	DISTANCE (FEET) [2]	MAXIMUM CONSTRUCTION NOISE LEVEL (DBA) [3]	EXISTING AMBIENT (DBA, LEQ) [4]	NEW AMBIENT (DBA, LEQ) [5]	INCREASE
Medical Office Building, North of Project Site	50	89.0	70.5	89.1	18.7
Cedars-Sinai Medical Towers, East of Project Site	50	89.0	65.2	89.0	23.8
Single-Family Residences on Bonner Drive, North of Project Site	400	70.9	55.4	71.1	15.7
Multi-Family Residences on Clark Drive, West of Project Site	475	64.5 [6]	61.1	66.1	5.0
Multi-Family Residences on Burton Way, South of Project Site	975	58.2 [6]	60.2	65.0	4.8

[1] Source: Terry A. Hayes Associates LLC, *Cedars-Sinai Medical Center Project Air Quality and Noise Impact Report*, August 2008.
[2] Distance of noise source from receptor.
[3] Construction noise source's sound level at receptor location, with distance and building adjustment.
[4] Pre-construction activity ambient sound level at receptor location.
[5] New sound level at receptor location during the construction period, including noise from construction activity.
[6] Includes a 5-dBA reduction for intervening buildings

An office building is located adjacent and to the west of the Project Site. Office buildings are not typically considered to be sensitive receptors. However, it should be noted that the office building would be exposed to similar construction noise levels as the adjacent medical office building.

The noise limitation of the LAMC does not apply where compliance is technically infeasible.[17] "Technically infeasible" means that the noise standard cannot be met despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of equipment. For example, it would not be feasible to utilize an 11-story sound blanket to reduce construction noise levels. Freestanding sound blankets and sound walls cannot extend 11 stories. Hanging a sound blanket off the side of the proposed building would interfere with construction activity. In addition, solid sound walls only block a portion of construction noise (typically 5 to 8 dBA, depending on height) from ground-level noise generators.

As shown in *Table 20: Construction Noise Impact-Unmitigated*, noise levels related to construction activity would exceed the 5-dBA significance threshold at nearby sensitive receptors, with the exception of the multi-family residences on Burton Way, south of the Project Site. As such, the Project would result in a significant impact without incorporation of mitigation measures. The significant impact would occur intermittently over approximately 36

[17]City of Los Angeles, *LAMC, Chapter IX, Article 2, Section 122.05.*

months (the length of construction) and would only occur when there is moderate or greater construction activity on the Project Site. This significant impact would occur during construction activities associated with the development of the Project and the remainder development under the Master Plan.

During construction, it is assumed that 100 delivery/haul trucks and 90 construction worker vehicles[18] would be traveling to and from the project site daily. For an eight-hour construction workday, it is assumed that approximately 12 to 13 delivery/haul trucks per hour would be traveling on the surrounding streets. It is assumed that construction worker vehicles would be traveling on the roadways during the AM and PM peak hours. The construction worker vehicles would be distributed throughout the roadways within the vicinity of the project site. Generally, noise levels increase by 3 dBA when the number of similar noise sources double.[19] When compared to the traffic volumes identified in the traffic report, the increase in delivery/haul trucks and construction worker vehicle trips are not anticipated to double the amount of traffic that currently exist in the surrounding area. As such, the increase in delivery/haul trucks and worker vehicles in the surrounding roadways is not anticipated to incrementally increase noise levels in the surrounding area by 3 dBA or more.

The Original EIR concluded that temporary construction noise impacts associated with development of the Master Plan would be significant and unavoidable. Construction noise associated with the remaining 170,650 square feet that is entitled under the Master Plan was analyzed in the Original EIR and included in the approvals for the Master Plan in 1993.

(2) Operational (Long-Term) Noise

Vehicular Noise

The predominant long-term noise source for the Project is vehicular traffic. According to the traffic report prepared by Linscott, Law & Greenspan, the Project would generate 1,181 daily vehicle trips.[20] The remaining entitlement allowed under the Master Plan (i.e., the 170,650-square feet) would generate 5,324 daily vehicle trips per day.[21] No net change in traffic associated with the 90,000 square-foot Existing Building was assumed.

To ascertain off-site noise impacts, traffic was modeled under future year (2023 or year of Project buildout) "No Project" and "With Project" conditions utilizing FHWA RD-77-108 noise calculation formulas. The "No Project" conditions include the remaining square footage allowed under the Master Plan (i.e., the 170,650-square feet) with associated parking, as well as Related Projects within the vicinity of the Project Site. "With Project" conditions include the Project (i.e., the addition of an equivalent of 200,000 square feet of floor area for medical uses, or 100 inpatient beds) and the Master Plan with associated parking, and Related Projects within the vicinity of the Project Site.

[18]Assumes 100 construction workers per day with an average vehicle ridership of 1.1.
[19]Caltrans, *Technical Noise Supplement*, 1998.
[20]Linscott, Law & Greenspan, Engineers, *Traffic Impact Study: Cedars-Sinai Medical Center Project*, June 23, 2008.
[21]Linscott, Law & Greenspan Engineers, *Traffic Impact Study: Cedars-Sinai Medical Center Project*, June 23, 2008.

Results of the analysis are summarized in *Table 21: 2007 and 2023 Estimated Community Noise Equivalent Level*. The greatest Project-related noise increase would be 0.4 dBA CNEL and would occur along Alden Drive-Gracie Allen Drive between Robertson Boulevard and George Burns Road. Roadway noise levels attributed to the Project would increase by less than 3 dBA CNEL at all other analyzed segments.

Mobile noise generated by the Project would not cause the ambient noise level measured at the property line of the noise-sensitive receptor sites to increase by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" category (*Table 17: Land Use Compatibility for Community Noise Environments*) or any 5-dBA or more increase in noise level. Therefore, the Project would result in a less than significant mobile source noise impact.

The Original EIR concluded that operation of the Master Plan would result in a less than significant increase in ambient noise levels in the area. Therefore, the Project's impact is similar to the impact identified in the Original EIR, and does not involve a new significant noise impact or a substantial increase in the severity of noise the impact previously identified in the Original EIR.

TABLE 21
2007 AND 2023 ESTIMATED COMMUNITY NOISE EQUIVALENT LEVEL [1]

ROADWAY SEGMENT	ESTIMATED DBA, CNEL [2]				
	Existing (2007)	No Project (2023)	Project (2023)	Project Impact	Cumulative Impact
Beverly Boulevard from Robertson Boulevard to George Burns Road (Commercial and Single-family uses)	71.9	73.4	73.4	0.0	1.5
Beverly Boulevard from George Burns Road to San Vicente Boulevard (Commercial uses)	71.9	73.6	73.6	0.0	1.7
Beverly Boulevard from San Vicente Boulevard to La Cienega Boulevard (Commercial uses)	72.9	74.6	74.7	0.1	1.8
Robertson Boulevard from Beverly Boulevard to Alden Drive-Gracie Allen Drive (Commercial uses)	69.8	72.5	72.5	0.0	2.7
Robertson Boulevard from Alden Drive-Gracie Allen Drive to Third Street (Commercial uses)	66.7	69.4	69.4	0.0	2.7
George Burns from Beverly Boulevard to Alden Drive-Gracie Allen Drive (Medical uses)	67.0	68.3	68.5	0.2	1.5
George Burns from Alden Drive-Gracie Allen Drive to Third Street (Medical uses)	67.5	68.5	68.7	0.2	1.2
Alden Drive-Gracie Allen Drive from Robertson Boulevard to George Burns Road (Medical uses)	64.0	66.8	67.2	0.4	3.2
Third Street from Robertson Boulevard to George Burns Road (Medical and Commercial uses)	65.7	68.0	68.0	0.0	2.3
Third Street from George Burns Road to Sherbourne Drive (Medical and Commercial uses)	70.5	72.6	72.7	0.1	2.2
La Cienega Boulevard from Wilshire Boulevard to Third Street (Residential and Commercial uses)	69.0	71.0	71.1	0.1	2.1

[1] Source: Terry A. Hayes Associates LLC, Cedars-Sinai Medical Center Project Air Quality and Noise Impact Report, August 2008. The predicted CNEL were calculated as peak hour Leq and converted into CNEL using the California Department of Transportation Technical Noise Supplement (October 1998). The conversion involved making a correction for peak hour traffic volumes as a percentage of average daily traffic and a nighttime penalty correction. The peak hour traffic was assumed to be ten percent of the average daily traffic.
[2] CNEL is at 50 feet from the roadway right-of-way.

Siren Noise

Siren noise from emergency vehicles leaving from and arriving at the West Tower would constitute a short-term and intermittent noise source. However, the Los Angeles Municipal Code, Chapter XI Noise Regulation, Article I and II, exempts any emergency vehicle noise generated within the City limits.[22] Siren noise would be short-term and intermittent and would result in a less-than-significant impact. Noise impacts associated with sirens were not discussed in the Original EIR.

Stationary Noise

Potential stationary noise sources related to the long-term operations of the Project include mechanical equipment and parking areas. Mechanical equipment (e.g., parking structure air vents and heating, ventilation and air conditioning (HVAC) equipment) may generate noise levels ranging from 48 dBA to 66 dBA. The applicable mitigation measures adopted in connection with the Master Plan include installing sound attenuating devices on exhaust fans, enclosing mechanical equipment, and providing sound absorbing and shielding provisions into the design of this equipment. Also, mechanical equipment would be designed so as to be located within an enclosure or confined to the rooftop of the proposed structure. In addition, mechanical equipment would be screened from view as necessary to comply with provisions of the LAMC for on-site stationary sources. Enclosing and screening the mechanical equipment from view would reduce mechanical equipment noise levels by at least three dBA. The medical office building north of the Project Site has an existing ambient noise level of approximately 70.5 dBA, and the medical towers east of the Project Site have an existing ambient noise level of approximately 65.2 dBA. Assuming that the mechanical equipment would generate noise levels of approximately 66 dBA, the LAMC requirement to enclose and screen the mechanical equipment from view would reduce the mechanical equipment noise levels to approximately 63 dBA. As a result, the ambient noise level would incrementally increase by less than one dBA at the medical office building and by approximately 2 dBA at the medical towers east of the Project Site. Operation of mechanical equipment would not be anticipated to incrementally increase ambient noise levels by 5 dBA or more. Therefore, stationary noise due to the Project would result in a less-than-significant impact.

The Original EIR found that stationary noise sources associated with the Master Plan would be required to comply with the City of Los Angeles noise ordinance. This requirement would also apply with implementation of the Project. Therefore, the Project's stationary source noise impact is similar to the impact identified in the Original EIR and does not involve a new significant noise impact or substantial increase in the severity of the noise impact previously identified for the Master Plan.

[22] Los Angeles Municipal Code, Chapter XI Noise Regulation, Article I and II, http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca, accessed on November 20, 2007.

Parking Noise

The 650-space Approved Parking Structure was approved at the Project Site as part of the Master Plan; construction of the Approved Parking Structure is associated with the implementation of the Master Plan is not considered a new development and would not be part of the 200,000 square feet of new development. Even so, noise monitoring at an existing parking structure south of the Project Site indicated that activity at the existing parking structure results in a noise level of approximately 65.8 dBA L_{eq} at 20 feet. Based on this monitored noise level, the adjacent medical office building to the south of the Project Site would be exposed to 65.9 dBA, or 0.1 dBA over the existing noise level. The other medical buildings (including the hospital) surrounding the Project Site would be further away from the parking structure and, thus, incremental increases in noise levels at these buildings would be less than the adjacent medical office buildings. Additionally, the 11-story building that would be constructed for the Project would shield sensitive receptors to the east of the proposed parking structure from parking-related noise. As the parking structure activity would not incrementally increase ambient noise levels by 5 dBA or more, parking noise would result in a less-than-significant impact.

Loading Docks and Service Access Areas

The West Tower project will incorporate a loading dock and ambulatory service area. These facilities will be located in the parking structure and accessed primarily from Gracie Allen Drive. The loading dock would continue to operate between the same hours and under similar circumstances as already observed on the CSMC Campus. Because the loading dock and ambulatory service area would be internal to the parking structure, these areas would be shielded from sensitive receptors by Project structures. The structures would act as a noise barrier and would prevent increased ambient noise levels by more than 5 dBA from the proposed loading docks at off-site sensitive receptors. The Project would not result in additional noise sources due to the operation of the loading docks or ambulatory services. The Project would result in a less than significant operational noise impact due to loading dock or service access operations.

Land Use Compatibility

The Noise Element of the General Plan indicates that interior noise for hospitals should be 45 dBA or lower. Typical construction of building walls provides a noise reduction of approximately 26 dBA. The medical facility on the Project Site would be constructed with fresh air ventilation systems and windows that cannot be opened. As such, interior noise levels would be at least 26 dBA less than exterior noise levels. As shown in *Table 16: Existing Estimated Community Noise Equivalent Level*, the maximum exterior noise level at and adjacent to the Project Site is approximately 65.8 dBA. This would result in interior noise level of approximately 39.8 dBA. Interior noise levels would be less than the 45 dBA CNEL. Residential uses, which have lower ambient noise levels than the Project Site, would be less affected by Project-related noise since these residential uses are located farther away from the Project Site than the adjacent medical uses.

As with the Original EIR, existing ambient noise levels within the Project Site and in its surrounding area exceed 60 dBA. As such, the State Building Code will require an acoustical analysis showing that the interior noise levels for the West Tower would be 45 dBA or less. Impacts associated with the Project are similar to the impact identified in the Original EIR, and the Project does not involve a new significant noise impact or a substantial increase in the severity of the noise impact previously identified in the Original EIR.

(3) Vibration

(a) Construction

Ground-borne vibration could occur adjacent to the medical office building north of the Project Site. As shown in *Table 22: Vibration Velocities for Construction Equipment*, typical heavy equipment (e.g., a large bulldozer) generates vibration levels of 0.352 PPV at a distance of ten feet. Loaded haul trucks generate vibration levels of 0.300 PPV at the same distance. These vibration levels would be less than the 0.5 inches per second significance threshold. As such, vibration due to construction of the Project would result in a less-than-significant impact, presuming that driven piles are not necessary for new construction. However, there is the potential that vibration levels would exceed the threshold of significance should driven piles be used for the Project. Therefore, mitigation is required to ensure that any potential impacts are reduced to a less-than-significant level.

Vibration impacts were not analyzed in the Original EIR. However, mitigation measures required to reduce the Project's vibration impacts are also applicable to the Master Plan project.

(b) *Operation*

The Project would not include significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the Project vicinity would be generated by vehicular travel and delivery trucks on the local roadways. Based on field observations, vibration levels from adjacent roadways are not perceptible at the Project Site. Similar to existing conditions, traffic-related vibration levels would not be perceptible by sensitive receptors. Thus, operational vibration would result in a less-than-significant impact. Vibration impacts were not analyzed in the Original EIR.

TABLE 22
VIBRATION VELOCITIES FOR CONSTRUCTION EQUIPMENT [1]

EQUIPMENT	PPV AT 10 FEET (INCHES/SECOND) [2]	PPV AT 35 FEET (INCHES/SECOND) [2]	PPV AT 55 FEET (INCHES/SECOND) [2]
Pile Driver (impact)	6.000	0.916	0.465
Pile Driver (sonic)	2.901	0.443	0.225
Large Bulldozer	0.352	0.054	0.027
Caisson Drilling	0.352	0.054	0.027
Loaded Trucks	0.300	0.046	0.023

[1] Source: Federal Transit Authority, Transit Noise and Vibration Impact Assessment, April 1995.
[2] Fragile buildings can be exposed to ground-borne vibration levels of 0.5 PPV without experiencing structural damage.

d. Cumulative Impacts

Regarding cumulative construction noise, the nearest Related Project is located approximately 300 feet north of the Project Site along Bonner Drive in the City of West Hollywood. The medical office building north of the Project Site and along Beverly Boulevard would be the nearest sensitive receptor exposed to construction noise from the proposed Project and nearest Related Project. It is anticipated that construction of the nearest Related Project would occur before construction of the proposed Project, however, should construction activities occur simultaneously, significant impacts may result.

It is assumed that the nearest Related Project would generate a similar maximum construction noise level as the proposed Project. As such, the construction noise level from the nearest Related Project would be 89 dBA at 50 feet (without mitigation implementation). The medical office building (nearest sensitive receptor) is approximately 200 feet from the nearest Related Project construction activity. At this distance, construction noise would be reduced to approximately 77 dBA.[23] Additionally, the nearest Related Project would be shielded from the medical office building by existing buildings along Beverly Boulevard, which would reduce construction noise by at least 10 dBA, resulting in a final construction noise level of 67 dBA at the medical office building.[24]

Adding the nearest Related Project construction noise level of 67 dBA to the Project construction noise level of 79 dBA (with mitigation) would result in a new construction noise level of 79.3 dBA at the medical office building. This would increase the ambient noise levels in the Project area by 9.3 dBA.[25] Therefore, cumulative construction noise would exceed the 5-dBA significance threshold and, as such, the Project would result in a cumulative construction noise impact.

Regarding cumulative operational noise, when calculating future traffic impacts, the traffic consultant took 141 additional projects into consideration. Thus, the future traffic results with and without the Project already account for the cumulative impacts from these other projects. Since the operational noise impacts are generated directly from the traffic analysis results, the future without Project and future with Project noise impacts described in this report already reflect cumulative impacts.

Table 21: 2007 and 2032 Estimated Community Noise Equivalent Level presents the cumulative increase in future traffic noise levels at various intersections (i.e., 2023 "No Project "conditions plus Project traffic). The maximum cumulative roadway noise increase would be 3.2 dBA CNEL and would occur along Alden Drive-Gracie Allen Drive between Robertson Boulevard and George Burns Road in a commercial area. The cumulative roadway noise levels would exceed the 3-dBA threshold increment. However, the new mobile noise level would not be within the "normally unacceptable" or "clearly unacceptable" category as shown in *Table 17: Land Use Compatibility for Community Noise Environments*. Therefore, the Project would not

[23] Terry A. Hayes and Associates email to Planning Associates, Inc., July 2, 2008.
[24] *Ibid*.
[25] *Ibid*.

result in a cumulatively considerable exterior or interior noise impact with respect to roadway noise.

The predominant vibration source near the Project Site is heavy trucks traveling on the local roadways. Neither the Project nor the Related Projects would substantially increase heavy-duty vehicle traffic near the Project Site or cause a substantial increase in heavy-duty trucks on local roadways since the Related Projects would develop residential and commercial uses that would not generate substantial amounts of heavy-duty truck trips. Related Projects would not include land uses that are associated with unusually high volumes of heavy-duty truck trips (e.g., shipping or warehouse facilities).[26] As such, the Project would not add to a cumulative vibration impact. Therefore, no significant cumulative impact from long-term noise sources would occur.

(1) Consistency with Applicable Plans and Policies

Consistency with applicable plans and policies is discussed above in subsection *(2) Operational Impacts, Land Use Compatibility*. As noted above, Project-related noise levels are consistent with the standards established for hospital uses (on-site) and residential uses (off-site) as provided in the Noise Element of the General Plan. Because the Project would be consistent with the Noise Element, impacts related to consistency with applicable noise-related plans and policies are less than significant.

4. MITIGATION PROGRAM

a. Regulatory Requirements, Standard Conditions, and Project Design Features

MM NOI-1: The Project will comply with the City's Noise Ordinance to ensure that construction activities are conducted in accordance with the LAMC.

b. 1993 Mitigation Measures (Carried Forward)

(1) Construction Noise

MM NOI-2: Specify the use of quieted equipment in compliance with the applicable provisions of the City of Los Angeles Noise Ordinance No. 156,363.

MM NOI-3: Route trucks hauling debris through non-residential areas by approval of the Department of Building and Safety.

MM NOI-4: The use of quieted equipment would reduce noise levels by an additional 3 to 6 dBA.

MM NOI-5: Limit demolition activities to the hours of 7:00 A.M. to 6:00 P.M., Monday through Friday, and 8:00 A.M. to 6:00 P.M., Saturday.

[26] Linscott, Law & Greenspan, Engineers, *Traffic Impact Study: Cedars-Sinai Medical Center Project*, June 23, 2008.

MM NOI-6: Construct a temporary noise barrier wall along the property line, where feasible, as determined by the Department of Building and Safety.

MM NOI-7: Specify that all sound-reducing devices and restrictions be properly maintained throughout the construction period.

MM NOI-8: Where temporary noise barriers are infeasible, portable noise panels to contain noise from powered tools shall be used.

MM NOI-9: Use rubber-tired equipment rather than track equipment.

MM NOI-10: Limit the hours of construction to between 7:00 A.M. and 6:00 P.M., Monday through Friday and between 8:00 A.M. and 6:00 P.M. on Saturday.

MM NOI-11: Keep loading and staging areas on site within the perimeter protected by the recommended temporary noise barrier and away from the noise-sensitive sides of the site.

MM NOI-12: If feasible, use alternate pile placement methods other than impact pile driving. (See MM NOI-22 for a detailed discussion of the feasibility of alternate pile placement methods).

(2) Operational Noise

MM NOI-13: Installation of sound attenuating devices on exhaust fans, enclosing mechanical equipment, and providing sound absorbing and shielding provisions into the design.

c. Recommended Additional Mitigation Measures

(1) Construction Noise

MM NOI-14: Construction contracts shall specify that all construction equipment be equipped with mufflers and other suitable noise attenuation devices.

MM NOI-15: Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).

MM NOI-16: Barriers such as plywood structures or flexible sound control curtains extending eight feet in height shall be erected around the perimeter of the Project Site to the extent feasible, to minimize the construction noise.

MM NOI-17: Flexible sound control curtains shall be placed around drilling apparatus and drill rigs used within the Project Site, to the extent feasible.

MM NOI-18: The construction contractor shall establish designated haul truck routes. The haul truck routes shall avoid noises sensitive receptors, including, but are not limited to residential uses and schools.

MM NOI-19: All residential units located within 500 feet of the construction site shall be sent a notice regarding the construction schedule of the Project. A sign, legible at a distance of 50 feet shall also be posted at the construction site. All notices and signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.

MM NOI-20: The construction contractor shall establish a "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and would be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.

(2) Operational Noise

MM NOI-21: The applicant shall conduct an acoustical analysis to confirm that if the materials to be used for the proposed Project would reduce interior noise levels to 45 dBA. If the analysis determines that additional noise insulation features are required, the acoustical analysis shall identify the type of noise insulation features that would be required to reduce the interior noise levels to 45 dBA, and the applicant shall incorporate these features into the proposed project.

(3) Vibration

MM NOI-22: Pile driving activity shall be limited based on the distance of vibration sensitive buildings to the Project Site. For buildings within 35 feet of pile driving activity, contractors shall use caisson drilling to drive piles. For buildings 35 to 55 feet from pile driving activity, contractors shall use sonic or vibratory pile drivers to drive piles. For buildings 55 feet and beyond pile driving activity, contractors may use impact pile drivers.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

Implementation of the Mitigation Program would reduce construction noise levels. Several of the mitigation measures would each reduce construction noise by approximately 5 to 10 dBA.[27] The noise disturbance coordinator would endeavor to resolve all noise complaints promptly. As shown in *Table 23: Construction Noise Impact – Mitigated*, construction activity would potentially increase ambient noise levels at sensitive receptors by 0.3 to 14.0 dBA L_{eq},

[27]USEPA, *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances*, 1971.

respectively. Construction-related noise would exceed the 5-dBA significance threshold at various sensitive receptors, and, as such, the Project would result in a temporary significant and unavoidable construction noise impact. Because the Original EIR also found that temporary construction noise impacts would result from construction of the Master Plan, construction of the Project would not result in new significant noise impacts or a substantial increase in the severity of significant noise impacts previously identified in the Original EIR. This is particularly true since much of the construction analyzed in this section represents implementation of the previously approved Master Plan, rather than of the Project.

TABLE 23
CONSTRUCTION NOISE IMPACT – MITIGATED [1]

KEY TO *FIGURE 29: NOISE MONITORING POSITIONS*	DISTANCE (FEET) [2]	MAXIMUM CONSTRUCTION NOISE LEVEL (DBA) [3]	EXISTING AMBIENT (DBA, LEQ) [4]	NEW AMBIENT (DBA, LEQ) [5]	INCREASE
Medical Office Building, North of Project Site	50	79.0	70.5	79.6	9.1
Cedars-Sinai Medical Towers, East of Project Site	50	79.0	65.2	79.2	14.0
Single-Family Residences on Bonner Drive, North of Project Site	400	60.9	55.4	62.0	6.6
Multi-Family Residences on Clark Drive, West of Project Site	475	54.5 [6]	61.1	62.0	0.9
Multi-Family Residences on Burton Way, South of Project Site	975	48.2 [6]	60.2	60.5	0.3

[1] Source: Terry A. Hayes Associates LLC, *Cedars-Sinai Medical Center Project Air Quality and Noise Impact Report*, April 2008.
[2] Distance of noise source from receptor.
[3] Construction noise source's sound level at receptor location, with distance and building adjustment.
[4] Pre-construction activity ambient sound level at receptor location.
[5] New sound level at receptor location during the construction period, including noise from construction activity.
[6] Includes a 5-dBA reduction for intervening buildings

The Project-related operational noise would result in a less than significant impact with mitigation. The Original EIR also concluded that operation of the Master Plan would result in less than significant impacts. Therefore, operation of the Project would not result in new significant noise impacts or a substantial increase in the severity of significant noise impacts as compared to the impacts previously found in the Original EIR.

Implementation of the Mitigation Program would ensure that construction-related vibration would result in a less than significant impact and that no adjacent building will be impacted by vibration sources during Project Site construction by restricting the distance at which pile-driving activities would occur and what type of equipment may be operated at specific distances. These restrictions would effectively reduce the potential for adjacent building damage to a less-than-significant impact. Operational ground-borne vibration impacts would be less than significant,

and no mitigation measures are required.

The Project will result in a net significant unavoidable impact (including cumulatively) related to construction (short-term) noise at sensitive receptors. Pursuant to CEQA Guidelines Sections 15092 and 15093, and in the event the Project is approved, the City of Los Angeles must adopt a Statement of Overriding Considerations acknowledging these outstanding significant adverse impacts and stating the reason(s) for accepting these impacts in light of the whole environmental record as weighed against the benefits of the Project.

IV. ENVIRONMENTAL IMPACT ANALYSIS

D. TRANSPORTATION AND CIRCULATION

1. INTRODUCTION

This section is based on a traffic and parking impact study that was prepared for the proposed CSMC West Tower Project by Linscott, Law & Greenspan, Engineers, dated June 23, 2008 (see *Appendix E: Traffic Impact Study)*, which report is incorporated fully herein. The traffic impact study has been prepared through coordination with and reviewed by the City of Los Angeles Department of Transportation ("LADOT"). This section discusses potential impacts on transportation facilities and parking resulting from the proposed Project.

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Local Street and Freeway System

The City of Los Angeles utilizes the roadway categories recognized by regional, state and federal transportation agencies. There are four categories in the roadway hierarchy, ranging from freeways, with the highest capacity, to two-lane undivided roadways, with the lowest capacity. The roadway categories are summarized as follows:

Freeways. Limited-access and high-speed travel ways included in the state and federal highway systems. Their purpose is to carry regional through-traffic. Access is provided by interchanges with typical spacing of one mile or greater. No local access is provided to adjacent land uses. There are no regional freeways in the immediate Project area. Within a radius of several miles, however, the Hollywood (101) Freeway runs north-south to the east of the Project Site, the Santa Monica/Rosa Parks (10) Freeway runs east-west to the south of the Project Site and the San Diego (405) Freeway runs north-south to the west of the Project Site.

Arterial. Major streets that primarily serve through-traffic and provide access to abutting properties as a secondary function. Arterials are generally designed with two to six travel lanes and their major intersections are signalized. This roadway type is divided into two categories: principal and minor arterials. For the City of Los Angeles, these are referred to as Major Highways Class II and Secondary Highways, respectively. Principal arterials (Major Highway Class II) are typically four-or-more lane roadways and serve both local and regional through-traffic. Minor arterials (Secondary Highways) are typically two-to-four lane streets that service local and commuter traffic. San Vicente Boulevard and Beverly Boulevard are examples of principal arterials or Major Highways. Robertson Boulevard and Third Street are examples of secondary arterials or Secondary Highways.

Collector. Streets that provide access and traffic circulation within residential and non-residential (e.g., commercial and industrial) areas. They connect local streets to arterials and are

typically designed with two through travel lanes (i.e., one through travel lane in each direction) that may accommodate on-street parking and/or provide access to abutting properties.

Local. Roadways that distribute traffic within a neighborhood or similar adjacent neighborhoods and are not intended for use as a through-street or a link between higher capacity facilities such as collector or arterial roadways. Local streets are generally fronted by residential uses and do not typically serve commercial uses.

Brief descriptions of the important roadways in the Project Site vicinity are provided below:

Robertson Boulevard. A north-south oriented roadway that is located immediately adjacent to the west of the CSMC Campus. Robertson Boulevard is designated as a Secondary Highway in the City of Los Angeles General Plan Transportation Element. One through travel lane is provided in each direction on Robertson Boulevard north of Burton Way, and two lanes are provided in each direction on the roadway south of Burton Way. Two hour parking between the hours of 8:00 A.M. and 6:00 P.M. is generally provided along both sides of Robertson Boulevard near the CSMC Campus. Robertson Boulevard is posted for a 35 miles per hour speed limit within the Project study area.

George Burns Road. A north-south oriented roadway that bisects the CSMC Campus, extending between Beverly Boulevard and Third Street. George Burns Road is a private roadway within the CSMC Campus, as designated by the City of Los Angeles. The roadway serves as a primary access point to the CSMC Campus, including access to the North and South Towers, the Davis Research Building and the Project Site. One through travel lane is provided in each direction on the roadway and speed humps are provided between Beverly Boulevard and Gracie Allen Drive. The George Burns Road/Gracie Allen Drive intersection is currently all-way stop sign controlled. Parking is prohibited along both sides of George Burns Road within the CSMC Campus. George Burns Road becomes Hamel Road to the south of Third Street outside of the CSMC Campus.

Willaman Drive. A north-south oriented roadway that extends between Third Street and Gregory Way. Willaman Drive is designated as a Local roadway in the City of Los Angeles General Plan Transportation Element. One through travel lane is provided in each direction on Willaman Drive in the Project vicinity. Two hour parking between the hours of 8:00 A.M. and 6:00 P.M. is generally provided along both sides of Willaman Drive near the CSMC Campus. There is no posted speed limit on this segment of Willaman Drive in the Project vicinity, thus it is assumed to have a prima facie speed limit of 25 miles per hour.

Sherbourne Drive. A north-south oriented roadway that extends southerly from Gracie Allen Drive on the CSMC Campus to Clifton Way. Within the CSMC Campus (i.e., between Gracie Allen Drive and Third Street), Sherbourne Drive is a private CSMC roadway. South of Third Street, Sherbourne Drive is designated as a Collector roadway in the City of Los Angeles General Plan Transportation Element. One through travel lane is provided in each direction on Sherbourne Drive in the Project vicinity. Parking is prohibited along both sides of Sherbourne Drive north of Third Street within the CSMC Campus. South of Third Street, two hour parking

between the hours of 8:00 A.M. and 6:00 P.M. is generally provided along both sides of the roadway.

San Vicente Boulevard. A northwest-to-southeast oriented roadway that borders the CSMC Campus to the east. San Vicente Boulevard is designated as a Major Highway Class II in the City of Los Angeles General Plan Transportation Element. Two through travel lanes are provided in each direction on San Vicente Boulevard in the Project vicinity. Parking is prohibited along both sides of San Vicente Boulevard south of Beverly Boulevard. North of Beverly Boulevard, two hour parking between the hours of 7:00 A.M. and 7:00 P.M. is generally provided along both sides of the roadway. San Vicente Boulevard is posted for a 35 miles per hour speed limit within the Project study area.

La Cienega Boulevard. A north-south oriented roadway that is located east of the CSMC Campus. La Cienega Boulevard is designated as a Major Highway Class II in the City of Los Angeles General Plan Transportation Element. Two through travel lanes are provided in each direction on La Cienega Boulevard in the Project vicinity. Parking is prohibited along both sides of the roadway in the vicinity of the CSMC Campus. La Cienega Boulevard is posted for a 35 miles per hour speed limit within the Project study area.

Beverly Boulevard. An east-west oriented roadway that borders the CSMC Campus to the north. Beverly Boulevard is designated as a Major Highway Class II in the City of Los Angeles General Plan Transportation Element. Two through travel lanes are provided in each direction on Beverly Boulevard in the Project vicinity. Two hour parking between the hours of 8:00 A.M. and 6:00 P.M. is generally provided along both sides of the roadway near the CSMC Campus. Beverly Boulevard is posted for a 35 miles per hour speed limit within the Project study area.

Gracie Allen Drive. An east-west oriented roadway that bisects the CSMC Campus, extending between Robertson Boulevard and San Vicente Boulevard. Gracie Allen Drive is a private roadway within the CSMC Campus, as designated by the City of Los Angeles. Gracie Allen Drive serves as a primary access point to the CSMC Campus, including access to the S. Mark Taper Foundation Imaging Center, the emergency entrance to the North Tower, and the Project Site. One to two through travel lanes are provided in each direction on Gracie Allen Drive in the Project vicinity. The George Burns Road/Gracie Allen Drive intersection is currently all-way stop sign controlled. Parking is prohibited along both sides of Gracie Allen Drive within the CSMC Campus. Gracie Allen Drive becomes Alden Drive between George Burns Road and Robertson Boulevard and continues as Alden Drive west of Robertson Boulevard.

Third Street. An east-west oriented roadway that borders the CSMC Campus to the south. Third Street is designated as a Secondary Highway in the City of Los Angeles General Plan Transportation Element. One through travel lane is provided in each direction on Third Street near the CSMC Campus, although two through travel lanes are provided in each direction on the roadway as a result of weekday peak commuter period curbside parking restrictions. Parking is prohibited along the north side of Third Street adjacent to the CSMC Campus. Two hour parking between the hours of 9:00 AM and 4:00 PM, however, is generally provided along the south side of Third Street near the CSMC Campus. Third Street is posted for a 30 miles per hour speed limit within the Project study area.

Burton Way. An east-west oriented roadway that is located south of the CSMC Campus. Burton Way is designated as a Secondary Highway in the City of Los Angeles General Plan Transportation Element. A raised median island is provided on the roadway within the Project area. Three through travel lanes are provided in each direction on Burton Way in the vicinity of the CSMC Campus. Two hour parking between the hours of 8:00 A.M. and 6:00 P.M. is generally provided along both sides of Burton Way within the Project area. Burton Way is posted for a 35 miles per hour speed limit within the Project study area.

Wilshire Boulevard. An east-west oriented roadway that is located south of the CSMC Campus. Wilshire Boulevard is designated as a Major Highway Class II in the City of Los Angeles General Plan Transportation Element. Three through travel lanes are provided in each direction on Wilshire Boulevard within the Project area. One hour parking between the hours of 10:00 AM and 3:00 PM is generally provided along both sides of Wilshire Boulevard within the Project area. Wilshire Boulevard is posted for a 35 miles per hour speed limit within the Project study area.

(2) Traffic Conditions and Levels of Service

The traffic analysis study area is generally comprised of locations that have the greatest potential to experience significant traffic impacts due to the Project, as defined by the Lead Agency. In the traffic engineering practice, the study area generally includes those intersections that are:

a. Immediately adjacent or in close proximity to the project site;

b. In the vicinity of the project site that are documented to have current or projected future adverse operational issues; and

c. In the vicinity of the project site that are forecast to experience a relatively greater percentage of project-related vehicular turning movements (e.g., at freeway ramp intersections).

(a) Study Intersections

After conferencing with City of Los Angeles staff, twenty-two (22) study intersections were identified for evaluation of potential Project impacts during the weekday morning ("A.M.") and afternoon ("P.M."). A traffic sub-consultant, Accutek Traffic Data, Inc., conducted manual counts at the study intersections during October 2007 and observed peak hour traffic volumes were increased at an annual rate of one percent (1%) per year to reflect year 2008 existing conditions. The 22 following study intersections were selected for analyses in consultation with LADOT staff in order to determine potential impacts related to the proposed Project:

Int. No. 1: Robertson Boulevard/Beverly Boulevard.[1]
Int. No. 2: Robertson Boulevard/Alden Drive-Gracie Allen Drive.[2]

[1] City of West Hollywood study intersection.
[2] City of Los Angeles study intersection.

Int. No. 3: Robertson Boulevard/Third Street.[2]
Int. No. 4: Robertson Boulevard/Burton Way.[3]
Int. No. 5: Robertson Boulevard/Wilshire Boulevard.[4]
Int. No. 6: George Burns Road/Beverly Boulevard. [1]
Int. No. 7: George Burns Road/Gracie Allen Drive.[5]
Int. No. 8: George Burns Road-Hamel Road/Third Street.[2]
Int. No. 9: Willaman Drive/Third Street.[2]
Int. No. 10: Willaman Drive/Wilshire Boulevard.[4]
Int. No. 11: Sherbourne Drive/Third Street.[2]
Int. No. 12: San Vicente Boulevard/Melrose Avenue.[1]
Int. No. 13: San Vicente Boulevard/Beverly Boulevard.[1]
Int. No. 14: San Vicente Boulevard/Gracie Allen Drive-Beverly Center.[2]
Int. No. 15: San Vicente Boulevard/Third Street.[2]
Int. No. 16: San Vicente Boulevard-Le Doux Road/Burton Way.[2]
Int. No. 17: San Vicente Boulevard/Wilshire Boulevard.[3]
Int. No. 18: La Cienega Boulevard/Beverly Boulevard.[2]
Int. No. 19: La Cienega Boulevard/Third Street.[2]
Int. No. 20: La Cienega Boulevard/San Vicente Boulevard.[2]
Int. No. 21 La Cienega Boulevard/Wilshire Boulevard.[4]
Int. No. 22 Orlando Avenue/Third Street.[2]

The general location of the Project in relation to the study locations and surrounding street system is presented in *Figure 31: Study Intersection Map*. The existing weekday A.M. and P.M. peak commuter period manual counts of turning vehicles at the study intersections are summarized in *Table 24: Existing Traffic Volumes*. The existing traffic volumes at the study intersections during the weekday A.M. and P.M. peak commuter hours are shown in *Figure 32: Existing Traffic Volumes - A.M. Peak Hour* and *Figure 33: Existing Traffic Volumes - P.M. Peak Hour*, respectively. Summary data worksheets of the manual traffic counts at the study intersections are contained in *Appendix E: Traffic Impact Study*.

A total of 21 of the study intersections are controlled by traffic signals. The remaining study intersection (Intersection No. 7, George Burns Road/Gracie Allen Drive) is controlled by all-way stop signs. The existing lane configurations at the 22 study intersections are displayed in *Figure 34: Existing Lane Configuration at Study Intersections*.

[3] Shared City of Los Angeles/City of Beverly Hills study intersection.
[4] City of Beverly Hills study intersection.
[5] CSMC privately controlled study intersection.

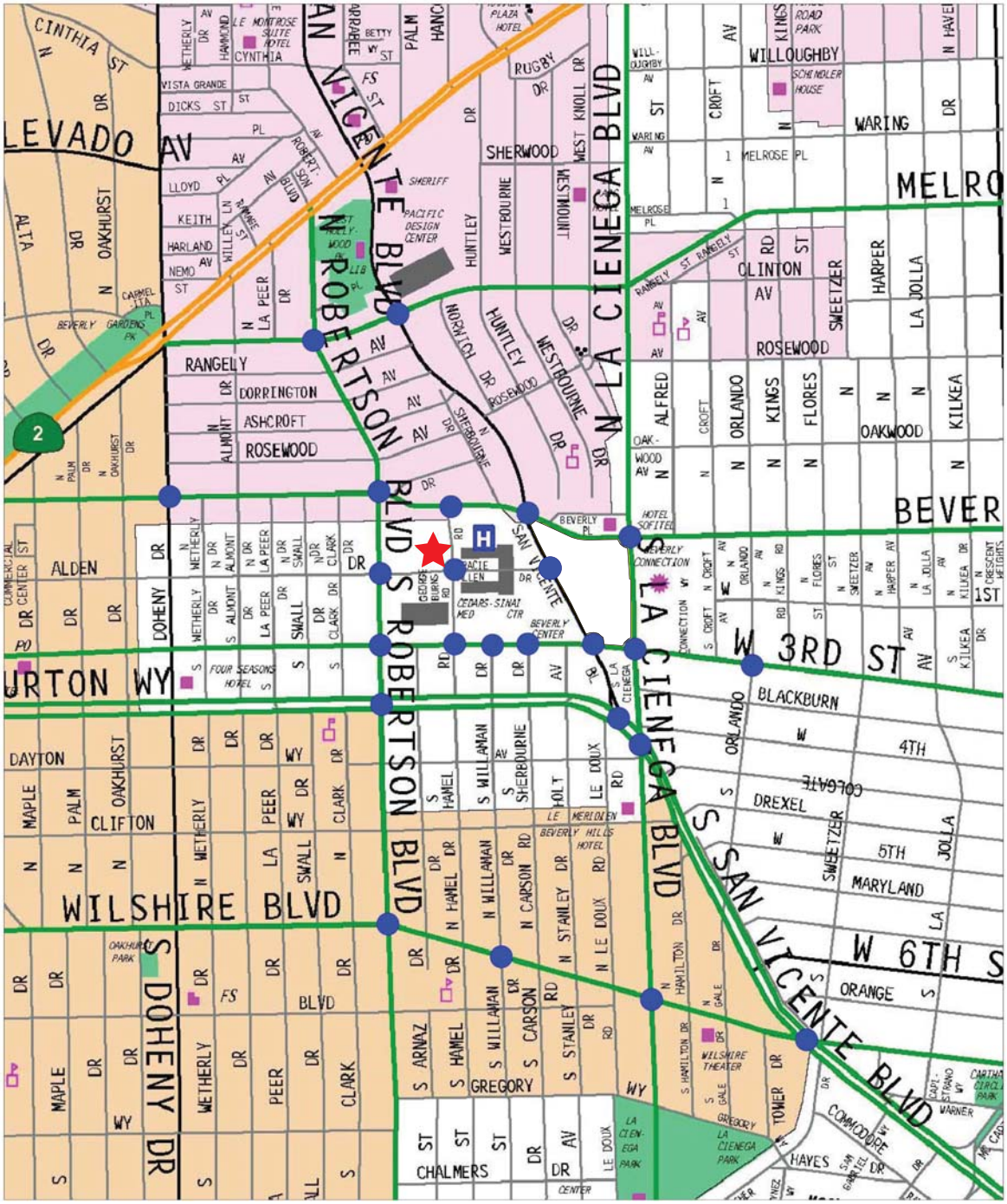


FIGURE 31
STUDY INTERSECTION MAP

SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

TABLE 24
EXISTING TRAFFIC VOLUMES [1]

NO.	INTERSECTION	DATE	DIR	AM PEAK HOUR		PM PEAK HOUR	
				BEGAN	VOLUME	BEGAN	VOLUME
1	Robertson Boulevard/ Beverly Boulevard	10/09/2007	NB	8:00	507	4:30	690
			SB		750		565
			EB		1,029		1,330
			WB		1,542		1,121
2	Robertson Boulevard/ Alden Drive-Gracie Allen Drive	10/09/2007	NB	8:15	593	4:45	712
			SB		654		57
			EB		145		174
			WB		128		194
3	Robertson Boulevard/ Third Street	10/09/2007	NB	8:15	699	4:45	694
			SB		595		592
			EB		395		533
			WB		949		633
4	Robertson Boulevard/ Burton Way	10/17/2007	NB	8:30	758	5:00	768
			SB		732		719
			EB		779		1,201
			WB		1,540		1,043
5	Robertson Boulevard/ Wilshire Boulevard	10/17/2007	NB	8:30	982	5:00	888
			SB		852		862
			EB		1,251		1,978
			WB		2,177		1,511
6	George Burns Road/ Beverly Boulevard	10/10/2007	NB	8:00	115	4:30	469
			SB		9		73
			EB		1,018		1,314
			WB		1,790		1,129
7	George Burns Road/ Gracie Allen Drive	10/10/2007	NB	7:45	212	4:30	415
			SB		373		227
			EB		167		307
			WB		213		216
8	George Burns Road-Hamel Road/ Third Street	10/10/2007	NB	8:00	169	4:30	54
			SB		212		640
			EB		644		705
			WB		1,207		718

TABLE 24 (CONTINUED)
EXISTING TRAFFIC VOLUMES [1]

NO.	INTERSECTION	DATE	DIR	AM PEAK HOUR		PM PEAK HOUR	
				BEGAN	VOLUME	BEGAN	VOLUME
9	Wilaman Drive/ Third Street	10/10/2007	NB	8:30	269	4:45	359
			SB		0		0
			EB		527		943
			WB		1,237		738
10	Willaman Drive/ Wilshire Boulevard	10/17/2007	NB	8:30	340	5:00	265
			SB		218		336
			EB		1,267		1,758
			WB		2,036		1,452
11	Sherbourne Drive/ Third Street	10/10/2007	NB	8:15	75	4:45	61
			SB		55		354
			EB		682		1,178
			WB		1,444		715
12	San Vicente Boulevard/ Melrose Avenue	10/17/2007	NB	8:15	813	5:00	1,095
			SB		635		908
			EB		547		972
			WB		1,082		872
13	San Vicente Boulevard/ Beverly Boulevard	10/11/2007	NB	8:30	891	4:15	1,072
			SB		1,076		940
			EB		728		1,331
			WB		1,552		1,026
14	San Vicente Boulevard/ Gracie Allen Drive-Beverly Center	10/11/2007	NB	8:30	931	5:00	930
			SB		955		969
			EB		192		494
			WB		16		375
15	San Vicente Boulevard/ Third Street	10/11/2007	NB	8:15	810	5:00	802
			SB		755		1,162
			EB		551		1,321
			WB		1,472		738
16	San Vicente Boulevard-Le Doux Road/ Burton Way	10/16/2007	NB	8:30	20	4:45	65
			SB		712		1,070
			EB		537		1,198
			WB		2,056		1,336

TABLE 24 (CONTINUED)
EXISTING TRAFFIC VOLUMES [1]

NO.	INTERSECTION	DATE	DIR	AM PEAK HOUR		PM PEAK HOUR	
				BEGAN	VOLUME	BEGAN	VOLUME
17	San Vicente Boulevard/ Wilshire Boulevard	10/18/2007	NB	8:15	1,722	5:00	969
			SB		1,061		1,448
			EB		1,322		1,519
			WB		1,448		1,446
18	La Cienega Boulevard/ Beverly Boulevard	10/18/2007	NB	8:45	1,019	5:00	1,719
			SB		1,528		1,276
			EB		779		1,649
			WB		1,515		1,104
19	La Cienega Boulevard/ Third Street	10/16/2007	NB	8:00	1,305	5:00	1,687
			SB		1,437		1,318
			EB		535		1,323
			WB		1,457		856
20	La Cienega Boulevard/ San Vicente Boulevard	10/16/2007	NB	8:00	1,389	5:00	1,626
			SB		1,570		1,346
			EB		1,183		2,216
			WB		2,040		1,476
21	La Cienega Boulevard/ Wilshire Boulevard	10/18/2007	NB	8:15	1,723	5:00	1,585
			SB		1,334		1,545
			EB		1,275		1,653
			WB		1,841		1,509
22	Orlando Avenue/ Third Street	10/10/2007	NB	8:15	185	5:00	485
			SB		480		245
			EB		600		1,291
			WB		1,373		798

[1] Counts conducted by Accutek. NOTE: Year 2007 manual traffic counts were adjusted by a 1.0 percent (1.0%) ambient growth factor to reflect year 2008 existing conditions.

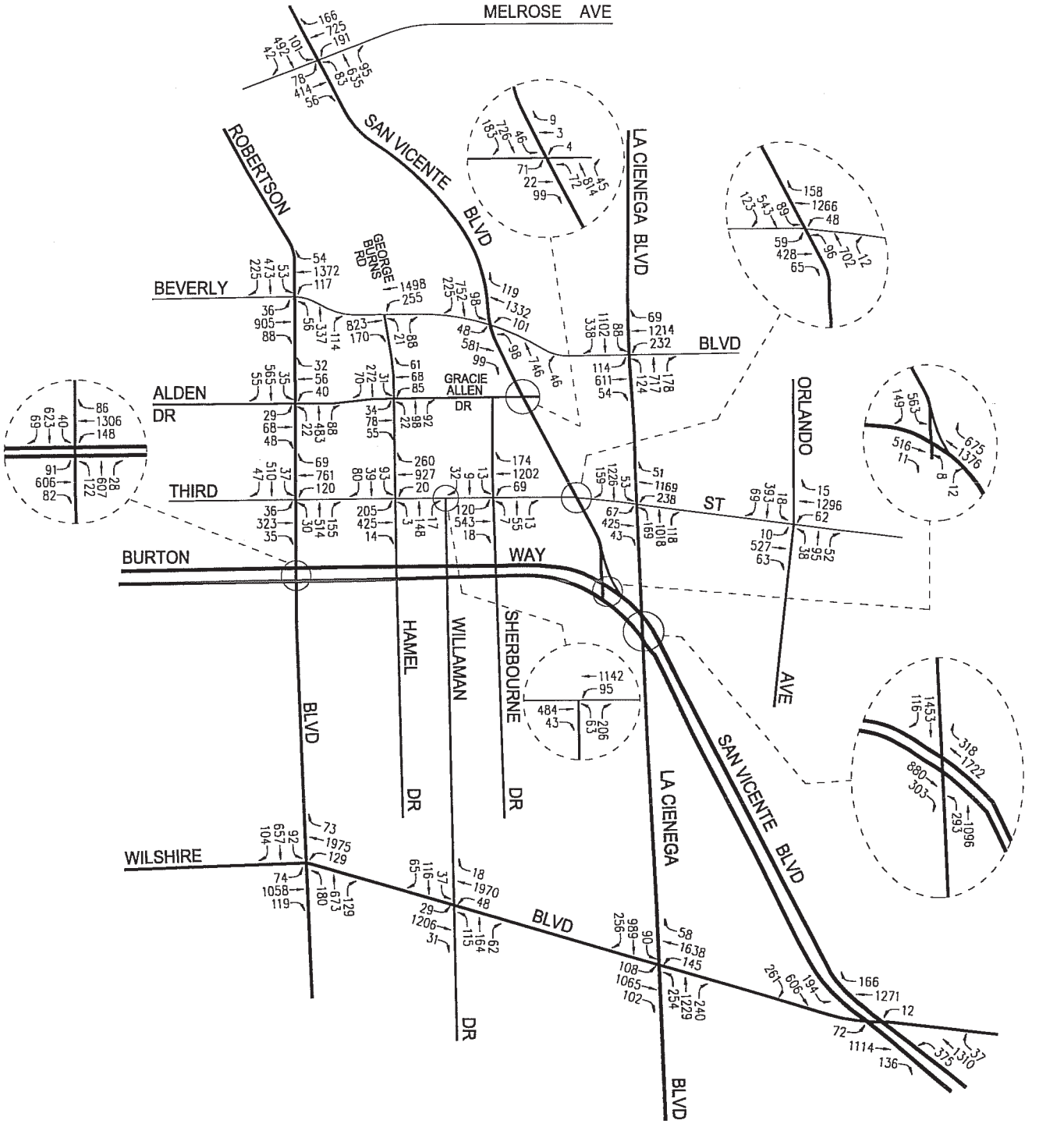


FIGURE 32
EXISTING TRAFFIC VOLUMES - A.M. PEAK HOUR
SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

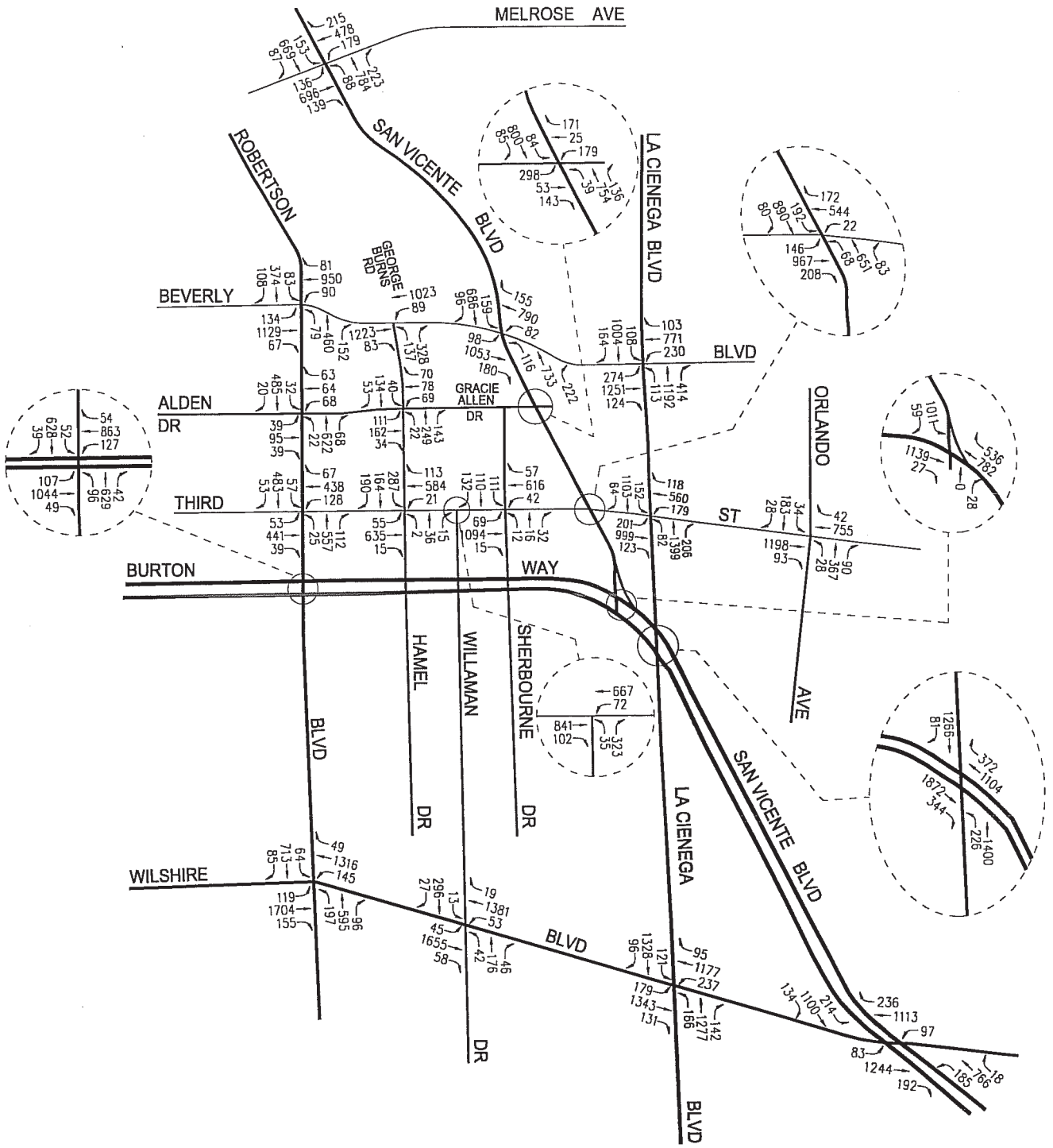
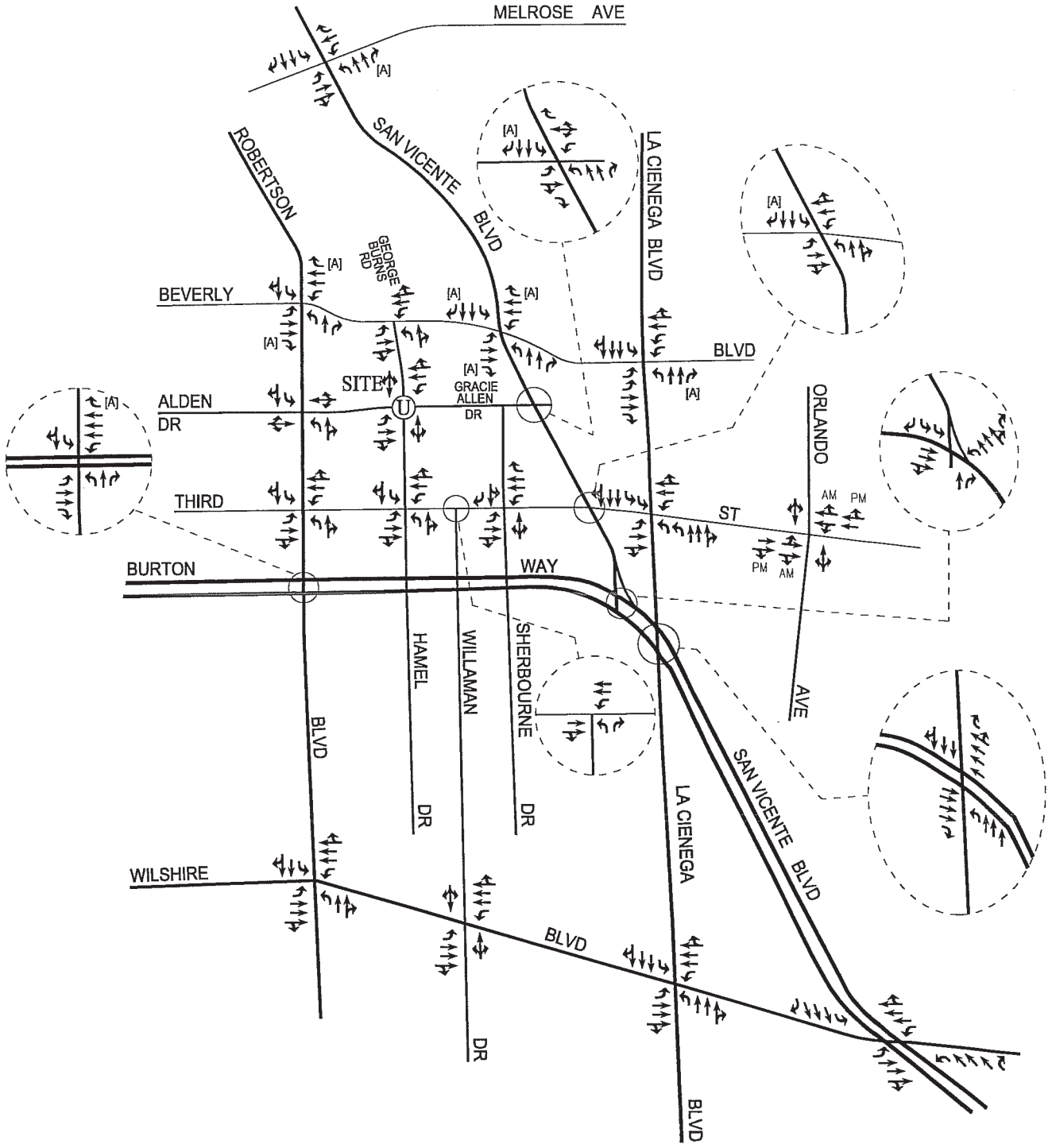


FIGURE 33
EXISTING TRAFFIC VOLUMES - P.M. PEAK HOUR
SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH



U UNSIGNALIZED INTERSECTIONS
[A] FUNCTIONAL RIGHT-TURN ONLY LANE

FIGURE 34
EXISTING LANE CONFIGURATION AT STUDY INTERSECTIONS
SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

(b) Level of Service

Methodology

The 22 study intersections were evaluated using the Critical Movement Analysis ("CMA") method, which determines the Volume-to-Capacity ("*V/C*") ratio on a critical lane basis. The *V/C* ratio is a measure of an intersection's traffic (existing or projected) as compared to the theoretical (design) capacity of the intersection. The overall intersection *V/C* ratio is subsequently assigned a Level of Service ("LOS") value to describe intersection operations. LOS is a qualitative indicator of an intersection's operating conditions, which is used to represent various degrees of congestion and delay. LOS varies from LOS A (free flow with little or no delay) to LOS F (jammed conditions resulting from extreme congestion). A more detailed description of the CMA method and values and explanation of corresponding Levels of Service are provided in *Appendix B of Appendix E: Traffic Impact Study*. The relationship between CMA *V/C* ratios and LOS for intersection capacity calculations is generally as follows:

***V/C* RATIO**	**LOS**
0 to 0.60	A
0.61 to 0.70	B
0.71 to 0.80	C
0.81 to 0.90	D
0.91 to l.00	E
≥ 1.00	F

Existing Intersection LOS

Eighteen of the 22 study intersections are presently operating at LOS D or better during the weekday A.M. and P.M. peak hours under existing conditions, as will be discussed in more detail in a later section. The following four study intersections are currently operating at LOS E during the weekday peak hours as shown below:

- Int. No. 1: Robertson Blvd./Beverly Blvd. — A.M. Peak Hour: V/C=0.914, LOS E
- Int. No. 5: Robertson Blvd./Wilshire Blvd. — A.M. Peak Hour: V/C=0.957, LOS E; P.M. Peak Hour: V/C=0.990, LOS E
- Int. No. 18: La Cienega Blvd./Beverly Blvd. — P.M. Peak Hour: V/C=0.989, LOS E
- Int. No. 21: La Cienega Blvd./Wilshire Blvd. — A.M. Peak Hour: V/C=0.976, LOS E; P.M. Peak Hour: V/C=0.996, LOS E

(3) Access and Local Circulation

The CSMC Campus and Project Site may be accessed through a combination of the local public street system and the private CSMC Campus internal streets, as shown on *Figure 35: CSMC Campus Access*.

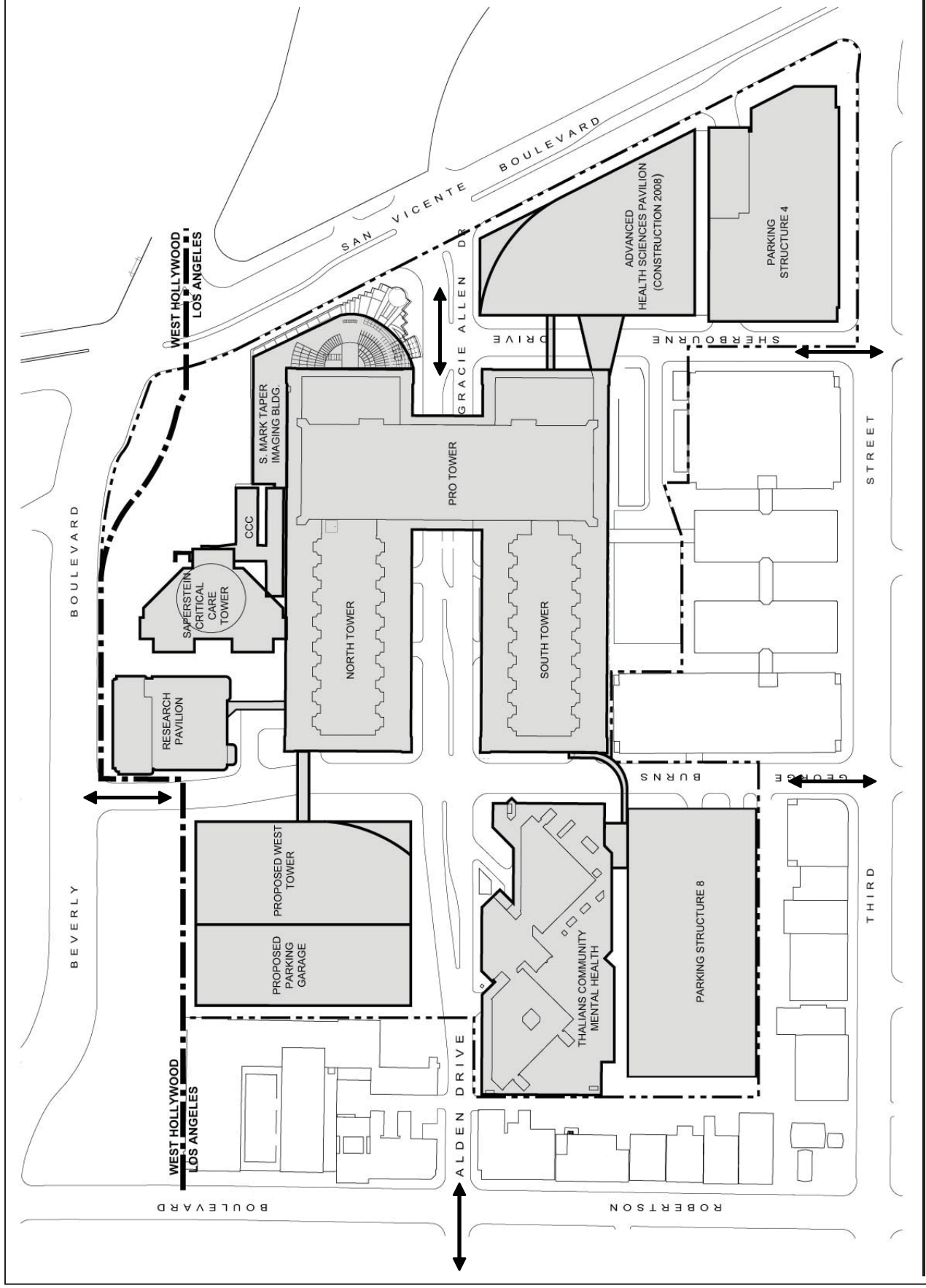


FIGURE 35
CSMC CAMPUS ACCESS

SOURCE: HOK

External vehicular access to the CSMC Campus is provided via five key intersections that are presently traffic signal controlled and are located on the periphery of the CSMC Campus. Left-turn lanes are provided at all of the subject intersections to facilitate access into the CSMC Campus. The five key CSMC Campus access intersections are:

- Robertson Boulevard/Alden Drive-Gracie Allen Drive
- George Burns Road/Beverly Boulevard
- George Burns Road-Hamel Road/Third Street
- Sherbourne Drive/Third Street
- San Vicente Boulevard/Gracie Allen Drive-Beverly Center

Internal circulation within the CSMC Campus is primarily facilitated by three private roadways that provide access to the CSMC Campus parking facilities and medical buildings: the north-south oriented George Burns Road, the east-west oriented Gracie Allen Drive and the north-south oriented Sherbourne Drive.

Two external CSMC Campus driveways are provided on the south side of Beverly Boulevard between George Burns Road and San Vicente Boulevard and two are provided on the west side of San Vicente Boulevard between Gracie Allen Drive and Third Street. All of the remaining CSMC Campus driveways providing access to parking facilities and medical buildings are situated within the CSMC Campus.

This Project contains no planned changes to the five CSMC Campus key access intersections or the external CSMC Campus driveways as they were approved under the Master Plan. The existing internal driveway, located at the northwest corner of George Burns Road and Gracie Allen Drive that accesses the Project Site, will be removed; however, access to the planned adjoining parking structure will be provided via a new driveway along the north side of Gracie Allen Drive.

(4) Parking

A total of 6,894 parking spaces are currently provided on the CSMC Campus, in accordance with the City parking requirements approved under Ordinance No. 168,847. This total includes 5,240 spaces in parking facilities controlled by CSMC and a total of 1,654 parking spaces in the two Medical Office Tower parking structures located south of the CSMC Campus along Third Street. After completion of the Advanced Health Sciences Pavilion (construction beginning in the first quarter of 2009), a net additional 381 parking spaces[6] will be provided on the Campus, bringing the total amount of parking provided on the Campus to 7,275 parking spaces by the start of the construction/demolition process for the Project. For purposes of this Draft SEIR, the 7,275 parking spaces resulting after construction of the Advanced Health Sciences Pavilion will be considered as the currently existing parking count.

[6] The net additional 381 parking spaces accounts for demolition of the existing 166-space parking lot at the Advanced Health Sciences Pavilion site and construction of 547 new parking spaces (547 – 166 = 381 net additional spaces).

(5) Public Transit

The Metro, LADOT and the City of West Hollywood currently provide public bus transit service within the CSMC Campus area. A summary of existing transit routes that serve the Project vicinity is provided in *Table 25: Existing Public Transit Routes* and illustrated in *Figure 36: Existing Public Transit Routes*.

TABLE 25
EXISTING PUBLIC TRANSIT ROUTES [1]

ROUTE	DESTINATIONS	ROADWAY NEAR SITE	NO. OF BUSES DURING PEAK HOUR		
			DIR	AM	PM
Metro 14	Beverly Hills to Downtown Los Angeles	Beverly Boulevard	EB WB	6 7	6 5
Metro 16	Century City to Downtown Los Angeles (via Hancock Park, Westlake)	Third Street	EB WB	10 12	11 15
Metro 218	Cedars-Sinai Medical Center to Studio City (via Beverly Hills, Park La Brea, West Hollywood)	Third Street	NB SB	4 4	3 3
Metro 220	Culver City to West Hollywood (via Beverly Hills)	Robertson Boulevard	NB SB	2 2	2 2
Metro 316	Century City to Downtown Los Angeles (via Hancock Park, Westlake)	Third Street	EB WB	7 6	6 4
Metro 305	Willowbrook to Westwood (via Watts, South LA, Crenshaw District, Mid-City, Miracle Mile, West Hollywood, Beverly Hills)	San Vicente Boulevard	NB SB	2 2	2 2
Metro 550	San Pedro to West Hollywood (via Harbor City, Harbor Gateway, Los Angeles Exposition Park, Mid-City, Beverly Hills)	San Vicente Boulevard	NB SB	2 3	3 2
Metro 714	Beverly Hills to Downtown Los Angeles	Beverly Boulevard	EB WB	4 4	4 4
Dash-Fairfax [2]	Wilshire Boulevard to Robertson Boulevard (Fairfax Avenue., Melrose Avenue, La Cienega Boulevard)	Third Street	EB WB	4 4	4 4
Dash-Hollywood/ West Hollywood [2]	Hollywood to West Hollywood	Gracie Allen Drive	EB WB	4 4	4 4
West Hollywood City Line Route A/B [3]	Hollywood to Beverly Hills (via West Hollywod)	San Vicente Boulevard	EB WB	0 0	2 2

[1] Sources: Los Angeles County Metropolitan Transportation Authority (LACMTA) Website, http://www.metro.net/default.asp.
[2] Sources: City of Los Angeles Department of Transportation (LADOT) Website, http://www.ladottransit.com.
[3] Sources: City of West Hollywood Website, http://www.weho.org.

FIGURE 36
EXISTING PUBLIC TRANSIT ROUTES
SOURCE: METROPOLITAN TRANSPORTATION AUTHORITY

NORTH

The location of the CSMC Campus facilitates pedestrian activity, bicycle usage and use of public transit services, particularly due to the proximity of nearby commercial corridors. Regional and local public bus transit stops are provided on the periphery of the CSMC Campus, as well as within the Campus along George Burns Road and Gracie Allen Drive.

b. Regulatory and Policy Setting

(1) General Plan Circulation Element and Community Plan

The Wilshire Community Plan (the "Community Plan") was adopted on September 19, 2001 to guide the development in the Project area. The Community Plan includes goals, objectives and policies pertaining to transportation issues, which focus predominantly on public transit, alternative transportation modes, transportation systems and congestion management, and parking.

The Community Plan notes that some of the major public transportation opportunities within the Community Plan area relate to the MTA rail transit lines and bus transit service. The Community Plan recognizes that the operation of a safe, convenient, and efficient mass transit line would also lessen regional dependence on the private automobile and the need for additional traffic capacity.

With regard to transportation demand management ("TDM"), it is the City's objective that the traffic LOS on the street system not exceed LOS D. TDM is a program designed to encourage people to change their mode of travel from single occupancy automotive vehicles to more efficient transportation modes. People are given incentives to utilize TDM measures such as public transit, ridesharing, modified work schedules, van pools, telecommuting, and non-motorized transportation modes such as the bicycle. The City actively enforces TDM requirements through a City-wide TDM Ordinance, participation in regional transportation management programs, and formation of localized transportation management associations.

(2) Regional Transportation System

The Congestion Management Program (the "CMP") is a state-mandated program that was enacted by the State Legislature with the passage of Proposition 111 in 1990 to address the impact of local growth on the regional transportation system. The MTA developed the 2004 CMP Traffic Impact Analysis ("TIA") guidelines for Los Angeles County (July 2004), which require that intersection and/or freeway monitoring locations be examined if a proposed project will add 50 or 150 more trips, respectively, during the A.M. or P.M. weekday peak periods.

The following CMP intersection monitoring locations in the Project area have been identified and will be discussed later:

CMP Station Designation	Intersection
Int. No. 5	Santa Monica Boulevard/Wilshire Boulevard
Int. No. 6	Wilshire Boulevard/La Cienega Boulevard (Study Int. No. 21)
Int. No. 161	Santa Monica Boulevard/La Cienega Boulevard

c. CSMC Campus Background and 1993 Approvals

On June 23, 1993, the Los Angeles City Council passed Ordinance Nos. 168,847 and 168,848 approving a Development Agreement, Master Plan, and Zone/Height District Change for the CSMC Campus. The CSMC Master Plan includes 700,000 square feet of medical space floor area, as analyzed and certified in the Original EIR, of which 529,350 square feet will have been built at the time of Project construction (including the Advanced Health Sciences Pavilion to begin construction in first quarter of 2009). Thus, the Master Plan currently contains 170,650 square feet of remaining entitlements that are un-built. The proposed Project includes an amendment to the Master Plan to accommodate 100 additional inpatient beds within 200,000 additional square feet of inpatient floor area on the CSMC Campus. The Original EIR examined the transportation impacts associated with development of the Approved Building on the Project Site under the Master Plan; therefore, several findings discussed in the Original EIR will reasonably apply to the transportation impact analysis for the proposed Project below. Therefore, the findings of the Original EIR will be referenced and used for comparison when reasonably applicable in the transportation analysis of this Draft SEIR.

3. ENVIRONMENTAL IMPACTS

a. Methodology

(1) Construction Analysis

To estimate the construction traffic impacts of the CSMC West Tower Project, certain construction assumptions must be made, which are detailed in the construction analysis below. After assumptions are made, construction traffic trip generations are calculated for daily construction trips associated with worker vehicles, haul trucks and miscellaneous trucks used during the construction process. A standard percentage of the daily construction trips generated are then assumed to be traveling during the weekday A.M. peak hour and P.M. peak hour. For miscellaneous construction trucks, a Passenger Car Equivalency ("PCE") has been determined and has been applied to the truck trips to estimate the number of passenger vehicle trips that would be associated with these trucks. The final estimated weekday A.M. and P.M. peak hour trips are expressed in PCE vehicle trips.

(2) Intersection Analysis

To estimate the traffic impacts of the West Tower Project, a multi-step process was utilized. First, trip generation estimates are used to calculate the total arriving and departing traffic volumes on a peak hour (i.e., A.M. and P.M.) and daily basis. The traffic generation potential is forecast by applying the appropriate vehicle trip generation equations or rates to the Project development tabulation (i.e., 100 inpatient beds).

Second, trip distribution identifies the origins and destinations of inbound and outbound Project traffic volumes. These origins and destinations are typically based on demographics and existing/anticipated travel patterns in the study area.

Third, traffic assignment involves the allocation of Project traffic to study area streets and intersections. Traffic assignment is typically based on minimization of travel time, which may or may not involve the shortest route, depending on prevailing operating conditions and travel speeds. Traffic distribution patterns are indicated by general percentage orientation, while traffic assignment allocates specific volume forecasts to individual roadway links and intersection turning movements throughout the study area.

With the forecasting process complete and project traffic assignments developed, the impact of the Project is isolated by comparing operational (i.e., LOS) conditions at the selected key intersections using expected future traffic volumes with and without the forecasted Project traffic. The need for site-specific and/or cumulative local area traffic improvements can then be evaluated and the significance of the Project's impacts identified.

As previously explained, the 22 study intersections were evaluated using the CMA method of analysis. The relative impact of the added traffic volumes to be generated by the Project during the A.M. and P.M. peak hours was evaluated based on analysis of future operating conditions at the 22 study intersections, with and without the forecasted Project traffic. The previously discussed capacity analysis procedures were utilized to evaluate the future *V/C* relationships and LOS characteristics at each study intersection.

Traffic impacts at the study intersections were analyzed for the following conditions:

[a] Existing conditions.

[b] Condition [a] plus 1.0 percent (1.0%) ambient traffic growth through year 2023 ("Existing With Ambient Growth Conditions").

[c] Condition [b] with completion and occupancy of the Related Projects ("Future Pre-Project Conditions").

[d] Condition [c] with completion and occupancy of the Project ("Future With Project Conditions").

[e] Condition [d] with implementation of Project mitigation measures, where necessary ("Future Project with Mitigation Conditions").

The traffic volumes for each new condition were added to the volumes in the prior condition to determine the change in capacity utilization at the 22 study intersections. Thus, the Future With Project Conditions analyze the cumulative impact of the proposed Project and provide a conservative and comprehensive analysis of the future conditions in the study area after anticipated full occupancy of the proposed Project in year 2023. Summaries of the forecast *V/C* ratios and LOS values for the study intersections during the A.M. and P.M. peak hours are shown in *Table 26: Summary of Volume-To-Capacity Ratios and Levels of Service*. The traffic analysis

TABLE 26
SUMMARY OF VOLUME TO CAPACITY RATIOS AND LEVEL OF SERVICE

NO	INTERSECTION	PEAK HOUR	[1] EXISTING		[2] YEAR 2023 W/ AMBIENT GROWTH		[3] YEAR 2023 W/ RELATED PROJECTS		[4]				[5]			
									YEAR 2023 W/ PROPOSED PROJECT		CHANGE V/C ([4] - [3])	SIGNIF. IMPACT	YEAR 2023 W/ PROJECT MITIGATION		CHANGE V/C ([5] - [3])	MITI-GATED
			V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			V/C	LOS		
1	Robertson Boulevard/ Beverly Boulevard	AM	0.914	E	1.031	F	1.316	F	1.320	F	0.004	NO	1.320	F	0.004	—
		PM	0.740	C	0.832	D	1.232	F	1.239	F	0.007	NO	1.239	F	0.007	—
2	Robertson Boulevard/ Alden Drive- Gracie Allen Drive	AM	0.481	A	0.534	A	0.825	D	0.872	D	0.022	YES	0.827	D	-0.023	YES
		PM	0.572	A	0.639	B	1.034	F	1.063	F	0.029	YES	0.946	E	-0.088	YES
3	Robertson Boulevard/ Third Street	AM	0.701	C	0.787	C	1.182	F	1.191	F	0.009	NO	1.191	F	0.009	—
		PM	0.659	B	0.739	C	1.223	F	1.227	F	0.004	NO	1.227	F	0.004	—
4	Robertson Boulevard/ Burton Way	AM	0.824	D	0.928	E	1.262	F	1.266	F	0.004	NO	1.266	F	0.004	—
		PM	0.872	D	0.983	E	1.287	F	1.295	F	0.008	NO	1.295	F	0.008	—
5	Robertson Boulevard/ Wilshire Boulevard	AM	0.957	E	1.101	F	1.397	F	1.400	F	0.003	NO	1.400	F	0.003	—
		PM	0.990	E	1.138	F	1.481	F	1.484	F	0.003	NO	1.484	F	0.003	—
6	George Burns Road/ Beverly Boulevard	AM	0.523	A	0.582	A	0.676	B	0.715	C	0.020	NO	0.646	B	-0.049	—
		PM	0.656	B	0.735	C	0.929	E	0.951	E	0.022	YES	0.918	E	-0.011	YES
7	George Burns Road/ Gracie Allen Drive	AM	0.455	A	0.523	A	0.633	B	0.714	C	0.039	NO	0.714	C	0.039	—
		PM	0.534	A	0.614	B	0.699	B	0.783	C	0.031	NO	0.783	C	0.031	—
8	George Burns Road- Hamel Road/ Third Street	AM	0.635	B	0.710	C	0.834	D	0.853	D	0.012	NO	0.853	D	0.012	—
		PM	0.436	A	0.482	A	0.630	B	0.678	B	0.017	NO	0.678	B	0.017	—
9	Willaman Drive/ Third Street	AM	0.416	A	0.459	A	0.571	A	0.587	A	0.007	NO	0.587	A	0.007	—
		PM	0.484	A	0.537	A	0.676	B	0.699	B	0.006	NO	0.699	B	0.006	—
10	Willaman Drive/ Wilshire Boulevard	AM	0.713	C	0.820	D	0.941	E	0.941	E	0.000	NO	0.941	E	0.000	—
		PM	0.668	B	0.768	C	0.898	D	0.898	D	0.000	NO	0.898	D	0.000	—
11	Sherbourne Drive/ Third Street	AM	0.469	A	0.520	A	0.686	B	0.704	B	0.006	NO	0.704	C	0.006	—
		PM	0.442	A	0.489	A	0.625	B	0.647	B	0.007	NO	0.647	B	0.007	—
12	San Vicente Boulevard/ Melrose Avenue	AM	0.814	D	0.937	E	1.120	F	1.121	F	0.001	NO	1.121	F	0.001	—
		PM	0.772	C	0.888	D	1.233	F	1.235	F	0.002	NO	1.235	F	0.002	—
13	San Vicente Boulevard/ Beverly Boulevard	AM	0.723	C	0.811	D	1.050	F	1.057	F	0.007	NO	1.057	F	0.007	—
		PM	0.746	C	0.838	D	1.100	F	1.109	F	0.009	NO	1.109	F	0.009	—
14	San Vicente Boulevard/ Gracie Allen Drive- Beverly Center	AM	0.353	A	0.387	A	0.475	A	0.494	A	0.006	NO	0.494	A	0.005	—
		PM	0.565	A	0.630	B	0.749	C	0.769	C	0.005	NO	0.769	C	0.005	—
15	San Vicente Boulevard/ Third Street	AM	0.741	C	0.832	D	1.119	F	1.125	F	0.006	NO	1.125	F	0.006	—
		PM	0.709	C	0.796	C	1.035	F	1.049	F	0.004	NO	1.049	F	0.004	—

TABLE 26 (CONTINUED)
SUMMARY OF VOLUME TO CAPACITY RATIOS AND LEVEL OF SERVICE

NO	INTERSECTION	PEAK HOUR	[1] EXISTING		[2] YEAR 2023 W/ AMBIENT GROWTH		[3] YEAR 2023 W/ RELATED PROJECTS		[4]				[5]			
									YEAR 2023 W/ PROPOSED PROJECT		CHANGE V/C ([4] - [3])	SIGNIF. IMPACT	YEAR 2023 W/ PROJECT MITIGATION		CHANGE V/C ([5] - [3])	MITI-GATED
			V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			V/C	LOS		
16	San Vicente Boulevard-Le Doux Road/ Burton Way	AM	0.493	A	0.547	A	0.703	C	0.708	C	0.003	NO	0.708	C	0.003	—
		PM	0.585	A	0.653	B	0.901	E	0.906	E	0.005	NO	0.906	E	0.005	—
17	San Vicente Boulevard/ Wilshire Boulevard	AM	0.759	C	0.853	D	1.060	F	1.065	F	0.005	NO	1.065	F	0.005	—
		PM	0.721	C	0.810	D	1.010	F	1.013	F	0.003	NO	1.013	F	0.003	—
18	La Cienega Boulevard/ Beverly Boulevard	AM	0.882	D	0.994	E	1.192	F	1.201	F	0.009	NO	1.201	F	0.009	—
		PM	0.989	E	1.118	F	1.580	F	1.583	F	0.003	NO	1.583	F	0.003	—
19	La Cienega Boulevard/ Third Street	AM	0.825	D	0.929	E	1.216	F	1.221	F	0.005	NO	1.221	F	0.005	—
		PM	0.873	D	0.984	E	1.369	F	1.372	F	0.003	NO	1.372	F	0.003	—
20	La Cienega Boulevard/ San Vicente Boulevard	AM	0.822	D	0.925	E	1.231	F	1.234	F	0.003	NO	1.234	F	0.003	—
		PM	0.732	C	0.822	D	1.192	F	1.197	F	0.005	NO	1.197	F	0.005	—
21	La Cienega Boulevard/ Wilshire Boulevard	AM	0.976	E	1.122	F	1.450	F	1.453	F	0.003	NO	1.453	F	0.003	—
		PM	0.996	E	1.145	F	1.501	F	1.503	F	0.002	NO	1.503	F	0.002	—
22	Orlando Avenue/ Third Street	AM	0.740	C	0.831	D	0.958	E	0.959	E	0.001	NO	0.959	E	0.001	—
		PM	0.706	C	0.793	C	1.003	F	1.009	F	0.002	NO	1.009	F	0.002	—

follows the City of Los Angeles traffic study guidelines[7] and is consistent with traffic impact assessment guidelines set forth in the Los Angeles County Congestion Management Program.[8] This traffic analysis evaluates potential Project-related impacts at the 22 study intersections in the vicinity of the Project Site.

The forecast of future conditions was prepared in accordance with procedures outlined in Section 15130 of the CEQA Guidelines. Specifically, the CEQA Guidelines provide two options for developing the future traffic volume forecast:

> "(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the [lead] agency, or
>
> (B) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency."

Accordingly, the traffic analysis provides a highly conservative estimate of future traffic volumes as it incorporates both the "A" and "B" options outlined in CEQA Guidelines for purposes of developing the forecast.

(3) Comparative Analysis

When applicable in the impact analysis, references and comparisons have been made to the Master Plan development entitlement (i.e., 700,000 square feet) analyzed in the Original EIR. The resulting net Project traffic impacts to LOS at the 22 study intersections (of which 18 were studied in the Original EIR as discussed below), parking, access, public transit, plan and policy consistency and cumulative impacts will be compared to the environmental impacts resulting from development of the adopted Master Plan. This comparison will determine the incremental impact of the Project and will analyze the substantiality of the Project's net transportation impacts above those determined for the Master Plan considered in the Original EIR.

It should be noted that the traffic impacts associated only with the proposed Project have been isolated in the traffic impact study to determine the true net impact of the Project beyond the impacts of the Master Plan addressed in the Original EIR. The residual 170,650 square feet of Master Plan entitlement, encompassed as part of the West Tower, have been analyzed in the traffic impact study as a Related Project (Related Project No. LA39 as shown in *Table 29: List of Related Projects* [page 194]). Doing so allows the impact analysis to account for the traffic impacts of this residual Master Plan entitlement on a cumulative basis, while still allowing for

[7] City of Los Angeles Department of Transportation, *Traffic Study Policies and Procedures*, http://www.lacity.org/LADOT/TrafficStudyGuidelines.pdf (March 2002).
[8] Los Angeles County Metropolitan Transportation Authority, *2004 Congestion Management Program for Los Angeles County*, http://www.metro.net/images/cmp_2004.pdf (July 2004).

the isolation of impact findings for the proposed Project. Therefore, the impacts of full build-out of the Master Plan are forecast through the Future Pre-Project Conditions; subsequently, the net incremental impact of the Project is then added to that condition to forecast Future With Project Conditions. The 90,000 square feet of space incorporated from the Existing Building into the West Tower will continue to be considered as existing pre-Master Plan development. Consequently, the impacts of the Existing Building uses were considered as existing traffic conditions for the Master Plan in the Original EIR and all impacts associated with this component have already been considered. Therefore, transportation impacts of all components of the 460,650 square foot West Tower will have been considered in this Draft SEIR.

b. Thresholds of Significance

In accordance with Los Angeles CEQA Thresholds Guide (as adopted 2006), the project would have significant impact on transportation and circulation if it would cause any of the following conditions to occur:

(1) Construction Thresholds

The determination of significance shall be made on a case-by-case basis, considering the following factors:

Temporary Traffic Impacts:

- Length of time of temporary street closures or closures of two or more traffic lanes;
- Classification of the street affected;
- Existing traffic levels and LOS on the affected streets and intersections;
- Whether the affected street directly leads to a freeway on- or off-ramp or other state highway;
- Potential safety issues involved with street or lane closures; and
- Presence of emergency services located nearby that regularly use the affected street.

Temporary Loss of Access:

- Length of time of any loss of vehicular or pedestrian access to a parcel fronting the construction area;
- Availability of alternative vehicular or pedestrian access within ¼ mile of the lost access; and
- Type of land uses affected, and related safety, convenience, and/or economic issues.

Temporary Loss of Bus Stops

- Length of time that an existing bus stop would be unavailable or that existing service would be interrupted;
- Availability of a nearby location (within ¼ mile) to which the bus stop or route can be temporarily relocated;

- Existence of other bus stops or routes with similar routes/destinations within a ¼ mile radius of the affected stops or routes; and
- Whether the interruption would occur on a weekday, weekend or holiday, and whether the existing bus route typically provides service that/those day(s).

Temporary Loss of On-Street Parking

- Current utilization of existing on-street parking;
- Availability of alternative parking locations or public transit options within ¼ mile of the project site; and
- Length of time that existing parking spaces would be unavailable.

(2) Intersection Traffic Thresholds

The significance of the potential impacts of Project generated traffic at each study intersection was identified using the traffic impact criteria set forth in LADOT's *Traffic Study Policies and Procedures*, (March 2002). According to the City's published traffic study guidelines, a significant transportation impact is determined based on the Sliding Scale criteria presented in *Table 27: City of Los Angeles Intersection Impact Threshold Criteria*.

TABLE 27
CITY OF LOS ANGELES – INTERSECTION IMPACT THRESHOLD CRITERIA

FINAL *V/C*	LEVEL OF SERVICE (LOS)	PROJECT RELATED INCREASE IN *V/C*
0.71 - 0.80	C	equal to or greater than 0.040
0.81 - 0.90	D	equal to or greater than 0.020
>0.90	E or F	equal to or greater than 0.010

The City's Sliding Scale Method requires mitigation of project traffic impacts whenever traffic generated by the proposed development causes an increase of the analyzed intersection Volume-to-Capacity (*V/C*) ratio by an amount equal to or greater than the values shown above.

(3) Access Thresholds

The Project would have a significant Project access impact if the intersection(s) nearest the primary site access is/are projected to operate at LOS E or F during the A.M. or P.M. peak hour, under Future With Project Conditions (as defined under Methodology herein).

(4) Parking Thresholds

The Project would have a significant impact on parking if the project provides less parking than needed as determined through an analysis of demand from the Project.

(5) Transit System Thresholds

The determination of significance shall be made on a case-by-case basis, considering the projected number of additional transit passengers expected with implementation of the proposed Project and available transit capacity.

c. Project Impacts

(1) Construction Activity[9]

(a) Construction Assumptions

Certain assumptions must be made about the demolition/construction process in order to determine the estimated traffic impacts caused by construction activities for the proposed Project. It is assumed that demolition and grading/excavation would occur on the Project Site during the first year of construction, in which it is estimated that approximately 78,100 cubic yards of dirt from the Project Site would be removed. It is also assumed that after completion of the demolition and grading phase of construction, the final grading and structure construction phase would begin and would extend over a two-year period. It is also assumed that the equipment staging area during the initial phases of grading, as well as after the start of construction, would occur on the Project Site or within the CSMC Campus. Construction worker parking would also occur within the CSMC Campus.

(b) Construction Traffic Generation

Demolition, Grading and Material Export

While heavy construction equipment would be located at the CSMC Campus during grading activities and would not travel to and from the Project Site on a daily basis, truck trips would be generated during the demolition, grading, and export period, so as to remove material (from demolition) from the Project Site. Trucks are expected to carry the export material to a receptor site located within 25 miles of the Project Site. CSMC anticipates that trucks with a capacity to carry at least 14 cubic yards of material per truck would be used during the export period. Assuming the export period will require approximately 22 workdays per month for five months, during the peak demolition, grading and export activities, up to 100 truck trips per day (i.e., 50 inbound trips and 50 outbound trips) are anticipated from the Project Site. Of the 100 daily truck trips, it is estimated that approximately ten trucks trips (five inbound trips and five outbound trips) would occur during the weekday A.M. peak hour and P.M. peak hour. Construction traffic impacts during the demolition, grading and material export period were not discussed in the Original EIR.

[9] All construction activity analysis and data was generated by Linscott Law & Greenspan Engineers, *Cedars-Sinai Medical Center West Tower Project – Construction Traffic Review* email to Planning Associates Inc., 16 April 2008.

Final Grading and Structure Construction

Activities related to the final grading and structure construction period would generate a higher number of vehicle trips as compared to the demolition, grading and material export period due to the larger amount of construction workers commuting daily to and from the Project Site. Thus, the greatest potential for impact on the adjacent street system would occur during the final grading and structure construction period.

During this period, a trip generation rate of 0.32 worker vehicle trips per 1,000 square feet of commercial development per day is used.[10] Construction workers are expected to typically arrive at the Project Site before 7:00 A.M. and most will depart before 3:00 P.M. Thus, these construction work trips would occur outside of the A.M. and P.M. peak hours of traffic on the local street system. Construction workers are also expected to remain on-site throughout the day. Taking into consideration these expectations, the construction workers are estimated to generate approximately 306 vehicle trips per day (i.e., 153 trips inbound and 153 trips outbound) during the peak construction phases at the Project Site. Of the peak construction daily trip generation of 306 daily trips, it is estimated that approximately 31 construction worker vehicle trips (ten percent of the daily construction worker inbound or outbound trips) would occur during each of the weekday A.M. peak hour and P.M. peak hour.

In addition to construction worker vehicles, additional vehicle trips may be generated by miscellaneous trucks traveling to and from the Project Site. These trucks may consist of larger vehicles delivering equipment and/or construction materials to the Project Site, or smaller pick-up trucks or four-wheel drive vehicles used by construction supervisors and/or City inspectors. During peak construction phases, it is estimated that approximately 50 trips per day would be made by miscellaneous trucks. To conservatively estimate the equivalent number of vehicles associated with the truck trips, a Passenger Car Equivalency or PCE factor of 2.0 was utilized based on standard traffic engineering practice.[11] Therefore, conservatively assuming 50 daily truck trips, it is estimated that the trucks would generate approximately 100 PCE vehicles trips (i.e., 50 trips inbound and 50 trips outbound) on a daily basis. Assuming ten percent of the daily truck trips occur during the peak hours, it is estimated that approximately 10 PCE vehicle trips (five inbound trips and five outbound trips) would occur during the weekday A.M. peak hour and P.M. peak hour.

Summed together, the construction worker vehicles and miscellaneous trucks are forecast to generate 406 PCE vehicle trips per day (i.e., 203 inbound and 203 outbound) during peak final grading and structure construction phases at the Project Site. During the weekday A.M. peak hour and P.M. peak hour, it is estimated that approximately 41 PCE vehicle trips would be generated during each of these peak hours. The Original EIR did not discuss construction traffic impacts associated with final grading and structure construction.

[10] Linscott Law & Greenspan Engineers, *Cedars-Sinai Medical Center West Tower Project – Construction Traffic Review* email to Planning Associates Inc., 16 April 2008.
[11] *Ibid*.

(c) Project Construction Impact and Management

Based on the relatively low number of construction trips generated as compared to the proposed Project's daily operational trip generation (as analyzed below) and the temporary nature of the additional trips, the traffic impacts (LOS, etc.) due to construction activities are forecast to be less than significant at the 22 study intersections during the weekday A.M. and P.M. peak hours. Further, due to the existing excess in parking spaces on the CSMC Campus, discussed below, construction worker parking is not anticipated to result in a significant impact on parking availability at the CSMC Campus.

Temporary, partial lane closures are anticipated during Project construction only on the private internal streets located within the CSMC campus. It can be expected that temporary, partial lane closures may occur on George Burns Road and Gracie Allen Drive. Construction for this type of street work is normally limited from 9:00 A.M. to 3:00 P.M. The private internal streets are expected to remain open during construction and detours around the construction site as a result of lane closures would not be required. Flag-men, however, would be used to control traffic movement during the ingress and egress of trucks and heavy equipment at the Project Site. Thus, Campus access on the private internal streets will only be lost over short periods of time during construction. Due to the utilization of the CSMC Campus for construction activities, the on-street parking outside of the Campus will not be affected. The Project construction is also not expected to affect existing transit bus stops or lines that traverse the CSMC Campus, as most of these are located on the east side of the Campus. Therefore, the proposed Project construction will not result in a significant impact to access and public transit on the Campus.

Although construction-related traffic impacts were not discussed in the Original EIR, the originally anticipated Approved Building and Approved Parking Structure under the Master Plan, which is of similar massing and size as the Project, would likely result in very similar construction activities, equipment and impacts as the proposed Project. Therefore, the proposed Project does not represent a substantial incremental impact beyond those anticipated for the Master Plan.

(d) Haul Route Approval

Approvals required by the City of Los Angeles for implementation of the proposed Project must include a haul route program approved by LADOT. According to Section 91.7006.7.4 of the Los Angeles Building Code, truck haul routes would only require a public hearing before the Board of Building and Safety Commissioners for any import or export of more than 1,000 cubic yards of earth material in a grading hillside area. Although import and export for the proposed Project would exceed the 1,000 cubic yards of earth material, the location of the Project Site is not within a grading hillside area; therefore, the proposed Project would not require a public hearing. With regard to other construction traffic-related issues, construction equipment would be stored within the perimeter fence of the construction site. With the required haul route approval and other construction management practices described above, construction activities are anticipated to result in a less than significant impact. Haul route impacts would be further reduced with the implementation of the following design features when the haul route is approved:

- Maintain existing access for the CSMC campus buildings and parking facilities;
- Limit any potential on-campus roadway lane closures to off-peak travel periods;
- Schedule receipt of construction materials to non-peak travel periods, to the extent possible;
- Coordinate deliveries to reduce the potential of trucks waiting to unload for protracted periods of times; and
- Prohibit parking by construction workers on adjacent streets and direct the construction workers to available parking within the CSMC campus.

A proposed haul route was not discussed in the Original EIR for the Project Site; however, a haul route will be determined before the beginning of the demolition, grading and export period and will be approved by the City of Los Angeles with potential input from the community.

(2) Long-Term Operation

(a) Roadways and Intersections

Project Traffic Generation

The trip generation rates and forecast of the vehicular trips anticipated to be generated by the proposed Project (which includes the addition of 100 inpatient beds equivalent to 200,000 square feet of floor area on the CSMC Campus) are presented in *Table 28: Project Traffic Generation*. The Project trip generation forecast was submitted for review and approval by LADOT staff.

Traffic generation is expressed in vehicle trip ends, defined as one-way vehicular movements, either entering or exiting the generating land use. Generation equations and/or rates used in the traffic forecasting procedure are found in the Seventh Edition of *Trip Generation*, published by the Institute of Transportation Engineers (ITE) [Washington D.C., 2003]. Traffic volumes expected to be generated by the Project were based upon rates per number of hospital beds. ITE Land Use Code 610 (Hospital) trip generation average rates were used to forecast the traffic volumes expected to be generated by the 100 new inpatient hospital beds planned for the Project.

TABLE 28
PROJECT TRAFFIC GENERATION [1]

LAND USE	SIZE	DAILY TRIP ENDS VOLUMES [2]	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
			IN	OUT	TOTAL	IN	OUT	TOTAL
Hospital [3]	100 Beds	1,181	79	34	113	47	83	130
Total		**1,181**	**79**	**34**	**113**	**47**	**83**	**130**

[1] Source: Institute of Transportation Engineers ("ITE"), *Trip Generation, 7th Edition*, 2003.
[2] Trips are one-way traffic movements, entering or leaving.
[3] ITE Land Use Code 610 (Hospital) trip generation average rates. The number of impatient hospital beds is based on a total of 200,000 square feet of development with an estimate of 2,000 square feet for each hospital bed (i.e., 200,000 SF /2,000 SF = 100 beds).
- Daily Trip Rate: 11.81 trips/Bed; 50% inbound; 50% outbound
- A.M. Peak Hour Trip Rate: 1.13 trips/Bed; 70% inbound; 30% outbound
- P.M. Peak Hour Trip Rate: 1.30 trips/Bed; 36% inbound; 64% outbound

As presented in *Table 28: Project Traffic Generation*, the Project is expected to generate 113 net new vehicle trips (79 inbound trips and 34 outbound trips) during the A.M. peak hour. During the P.M. peak hour, the Project is expected to generate 130 net new vehicle trips (47 inbound trips and 83 outbound trips). Over a 24-hour period, the Project is forecast to generate 1,181 net new daily trip ends during a typical weekday (approximately 592 inbound trips and 592 outbound trips). In the Original EIR, build-out of the Master Plan was estimated to generate 594 new vehicle trips during the A.M. peak hour and 1,794 new vehicle trips during the P.M. peak hour, resulting in approximately 23,920 additional daily vehicle trips during a typical weekday. [Original EIR Findings, Section III.B.11]

Project Traffic Distribution and Assignment Analysis

Project traffic volumes both entering and exiting the site have been distributed and assigned to the adjacent street system based on the following considerations:

- The site's proximity to major traffic corridors (i.e., Robertson Boulevard, San Vicente Boulevard, Beverly Boulevard, Third Street, Burton Way, etc.);
- Expected localized traffic flow patterns based on adjacent roadway channelization and presence of traffic signals;
- Existing intersection traffic volumes;
- Ingress/egress availability at the CSMC Campus;
- The location of existing and proposed parking areas; and
- Input from LADOT staff.

The general, directional traffic distribution pattern for the proposed Project is presented in *Figure 37: Project Trip Distribution*. The forecast A.M. and P.M. peak hour traffic volumes associated with the Project are presented in *Figure 38: A.M. Peak Hour Project Traffic Volumes* and *Figure 39: P.M. Peak Hour Project Traffic Volumes*, respectively. The traffic volume assignments presented in *Figure 40: A.M. Peak Hour Project Traffic Volumes* and *Figure 41: P.M. Peak Hour Project Traffic Volumes* reflect the traffic distribution characteristics shown in *Figure 37: Project Trip Distribution* and the Project traffic generation forecast presented in *Table 28: Project Traffic Generation*.

Existing Conditions

As indicated in column [1] of *Table 26: Summary of Volume To Capacity Ratios and Levels of Service*, 18 of the 22 study intersections are currently operating at LOS D or better during the A.M. and P.M. peak hours under existing conditions. The following four study intersections are currently operating at LOS E or F during the peak hours shown below (see *Figure 32: Existing Traffic Volumes - A.M. Peak Hour* and *Figure 33: Existing Traffic Volumes - P.M. Peak Hour*).

Int. No. 1: Robertson Blvd./Beverly Blvd.	A.M. Peak Hour: *V/C* =0.914, LOS E
Int. No. 5: Robertson Blvd./Wilshire Blvd.	A.M. Peak Hour: *V/C* =0.957, LOS E P.M. Peak Hour: *V/C* =0.990, LOS E

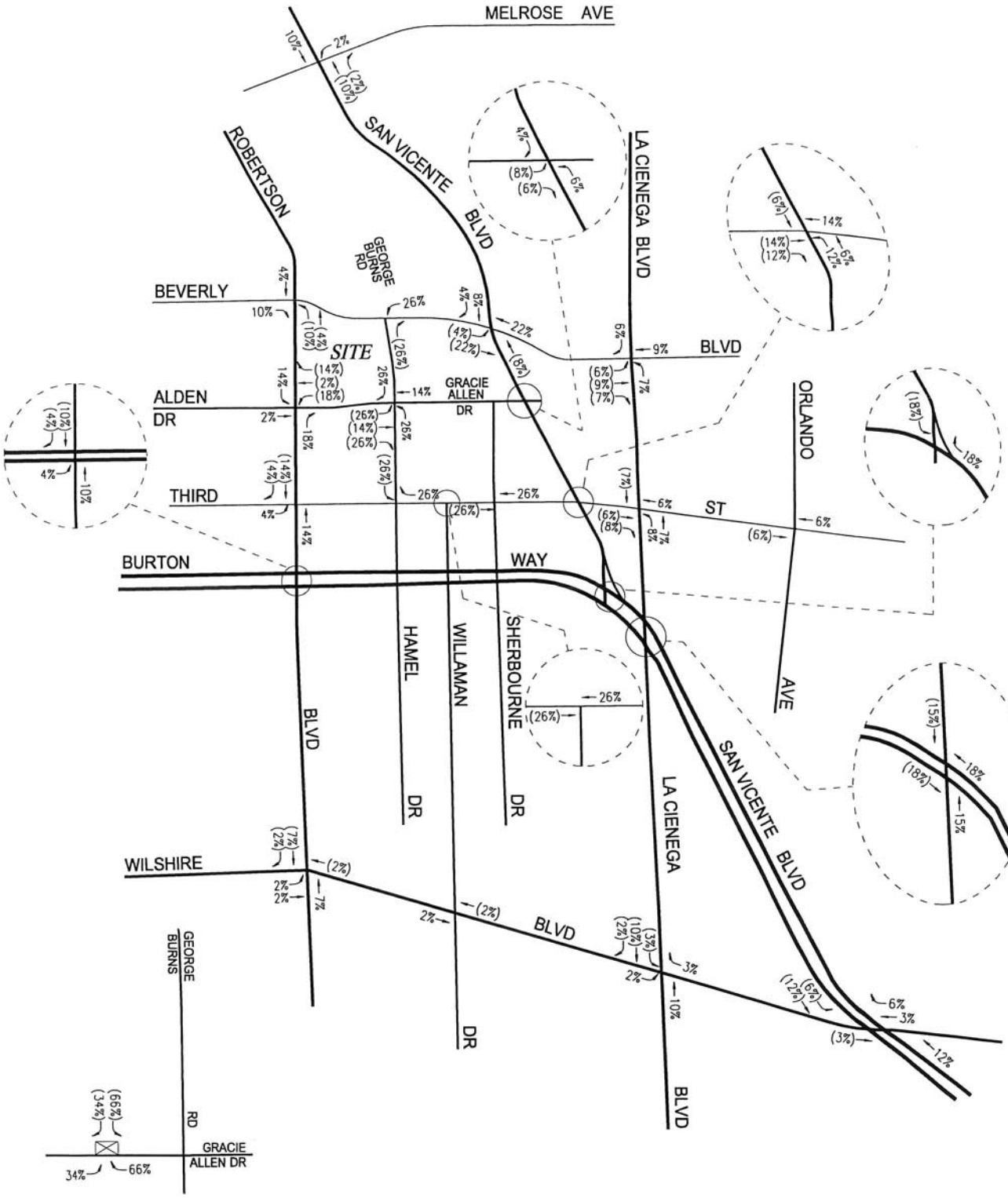


FIGURE 37
PROJECT TRIP DISTRIBUTION

SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

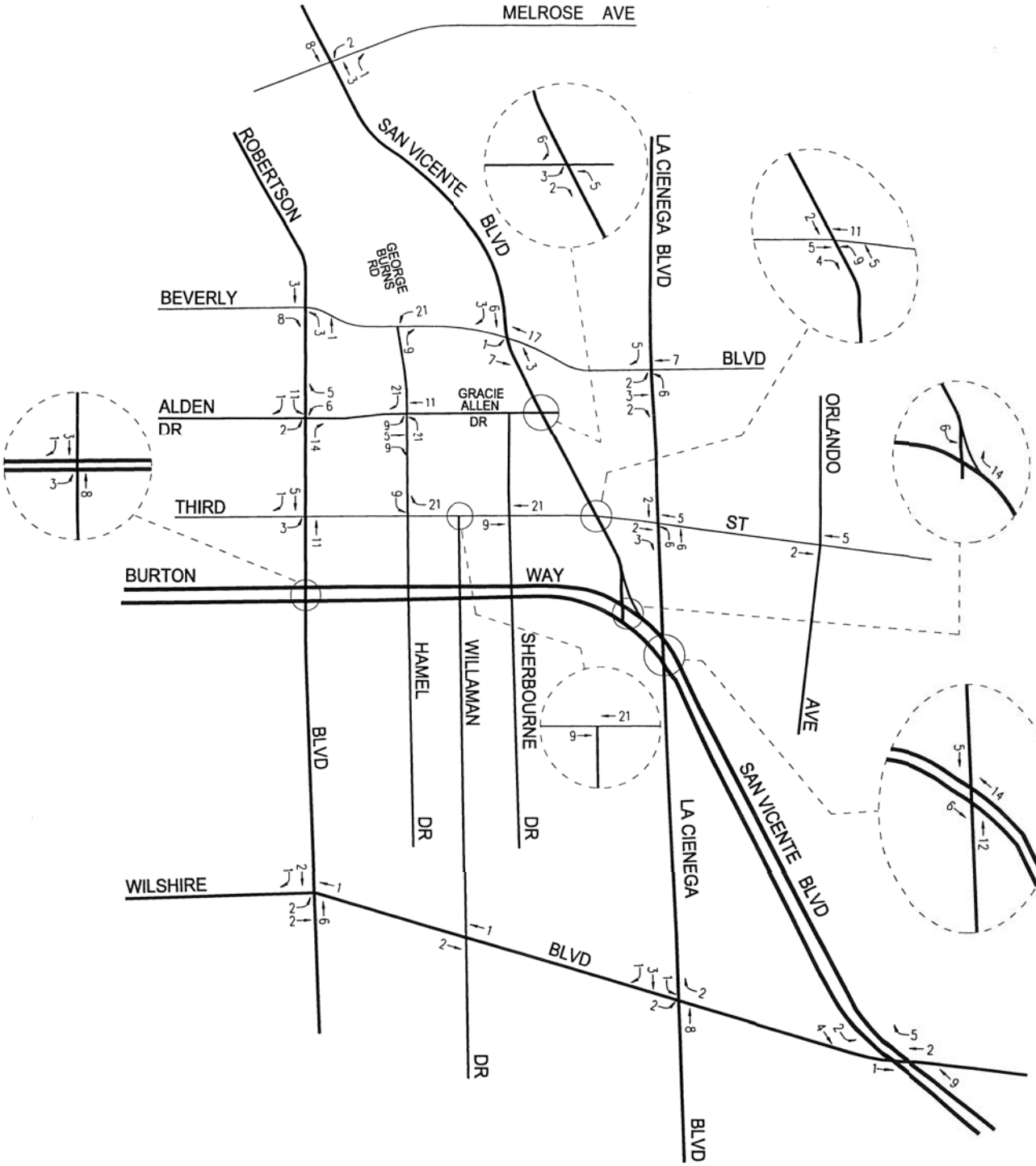


FIGURE 38
A.M. PEAK HOUR PROJECT TRAFFIC VOLUMES
SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

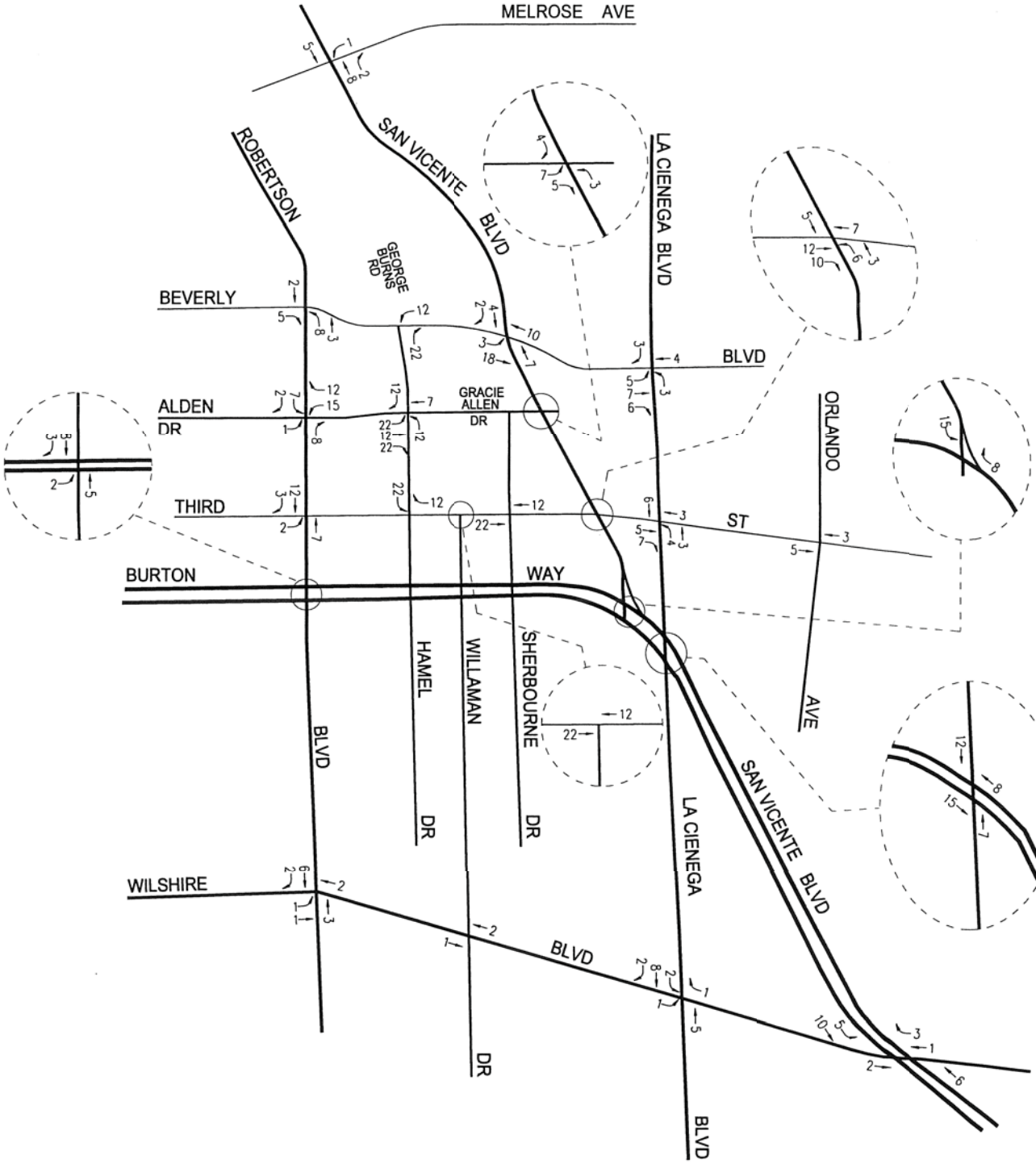


FIGURE 39
P.M. PEAK HOUR PROJECT TRAFFIC VOLUMES
SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

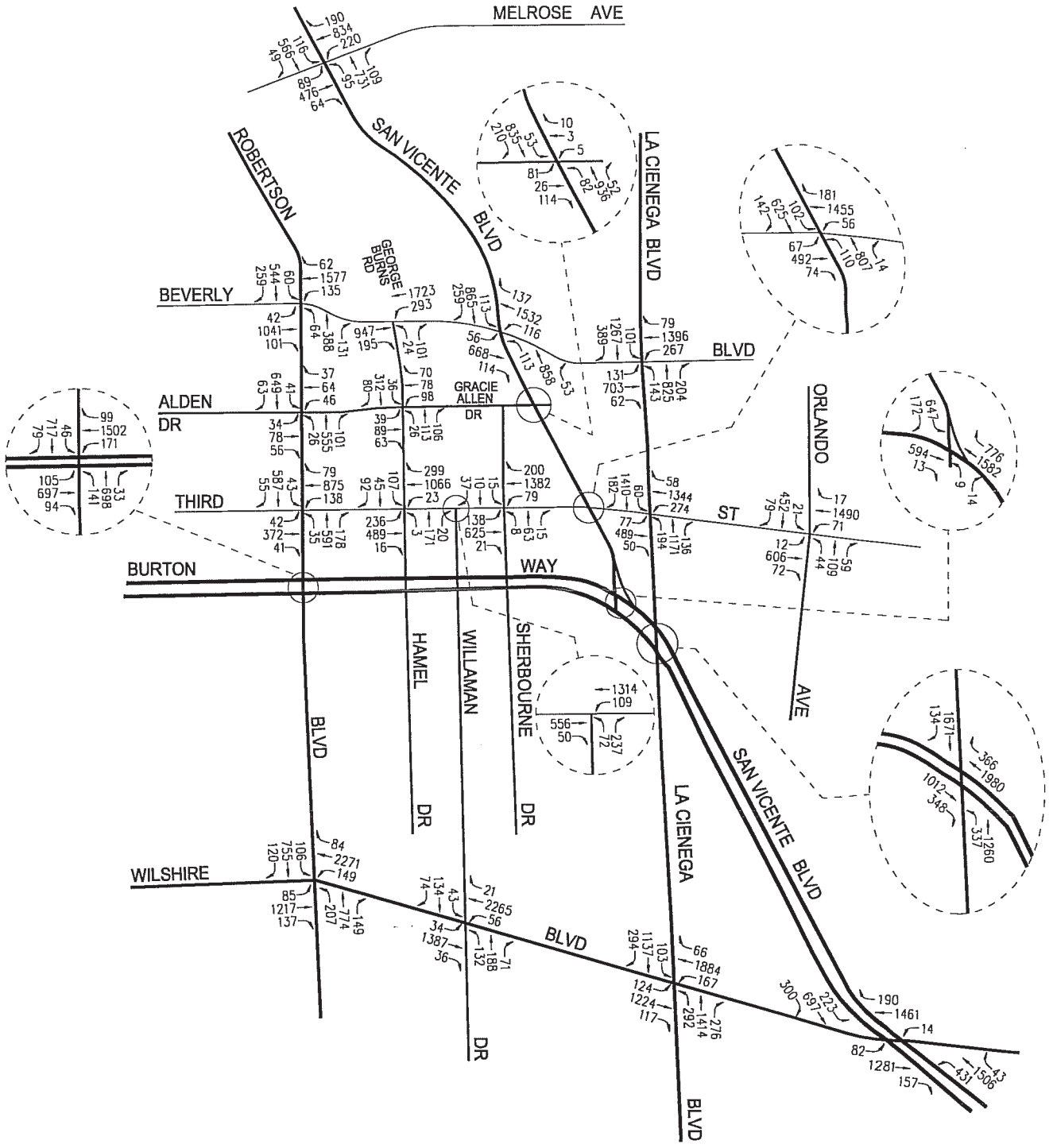


FIGURE 40
EXISTING WITH AMBIENT GROWTH TRAFFIC VOLUMES FOR A.M. PEAK HOUR

SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

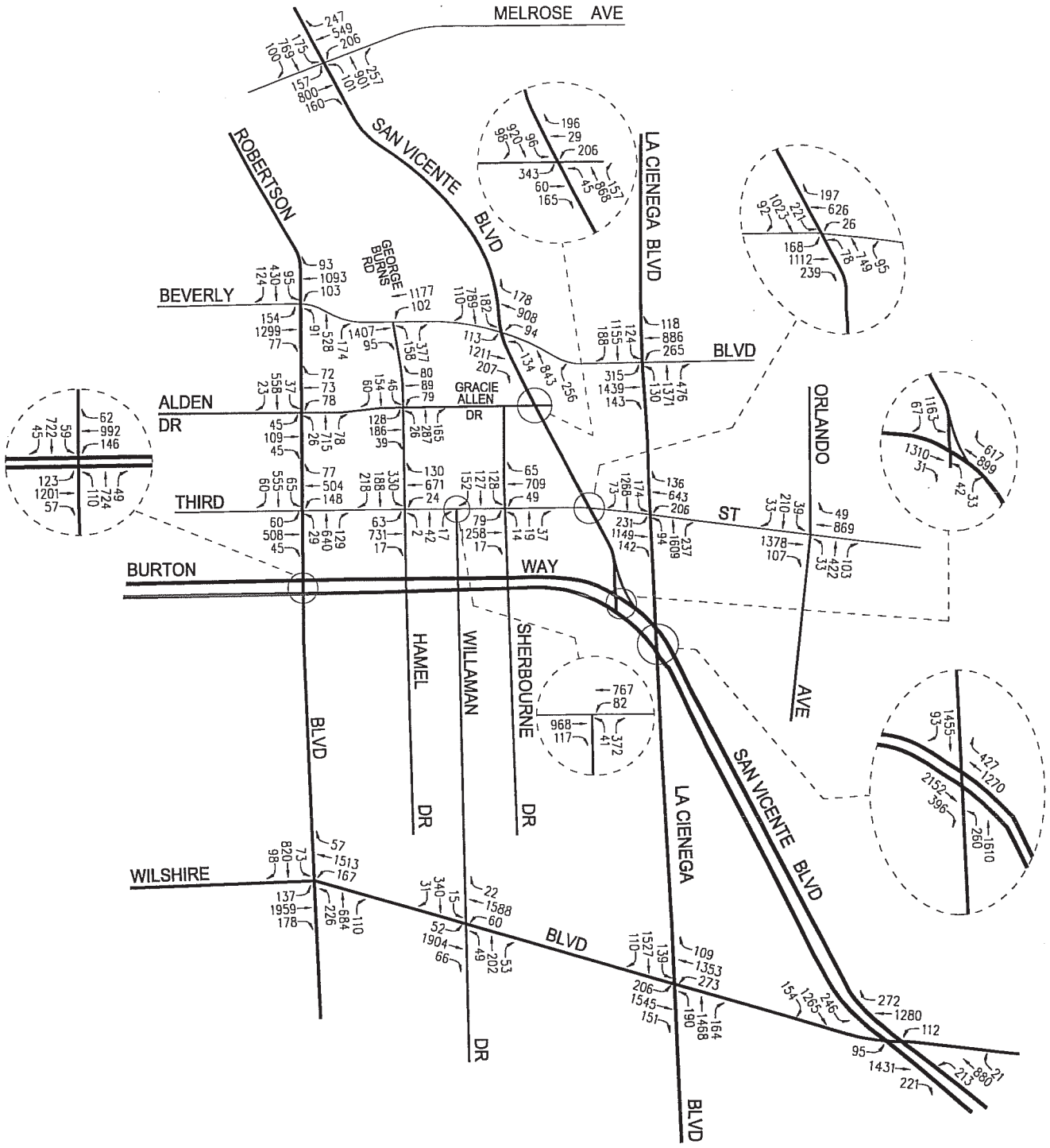


FIGURE 41
EXISTING WITH AMBIENT GROWTH TRAFFIC VOLUMES FOR P.M. PEAK HOUR

SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

Int. No. 18: La Cienega Blvd./Beverly Blvd.	P.M. Peak Hour: *V/C* =0.989, LOS E
Int. No. 21: La Cienega Blvd./Wilshire Blvd.	A.M. Peak Hour: *V/C* =0.976, LOS E P.M. Peak Hour: *V/C* =0.996, LOS E

Existing With Ambient Growth Conditions

In order to account for unknown Related Projects not included in this analysis, the existing traffic volumes were increased at an annual rate of one percent (1.0%) per year to the year 2023 (i.e., the anticipated year of Project build-out). This "ambient growth factor" was based on general traffic growth factors provided in the *2004 Congestion Management Program for Los Angeles County* (the "CMP manual") and determined in consultation with LADOT staff. It is noted that based on review of the general traffic growth factors provided in the CMP manual for the West Los Angeles area, it is anticipated that the existing traffic volumes are expected to increase at an annual rate of less than 1.0% per year between the years 2005 and 2025. Thus, application of this annual growth factor allows for a conservative, worst case forecast of future traffic volumes in the Project area. Further, it is noted that the CMP manual's traffic growth rate is intended to anticipate future traffic generated by development projects in the Project vicinity. Therefore, the inclusion in this traffic analysis of both a forecast of traffic generated by known Related Projects plus the use of an ambient growth factor based on CMP traffic model data will result in a conservative estimate of future traffic volumes at the Project study intersections.

The 1.0% ambient growth would incrementally increase the *V/C* ratios at all of the study intersections. As shown in column [2] of *Table 26: Summary of Volume To Capacity Ratios and Levels of Service*, 14 of the 22 study intersections are expected to continue to operate at LOS D or better during the A.M. and P.M. peak hours with the addition of ambient growth traffic through the year 2023. The following eight study intersections are expected to operate at LOS E or F during the peak hours shown below with the addition of ambient growth traffic:

Int. No. 1: Robertson Blvd./Beverly Blvd.	A.M. Peak Hour: *V/C* =1.031, LOS F
Int. No. 4: Robertson Blvd./Burton Way	A.M. Peak Hour: *V/C* =0.928, LOS E P.M. Peak Hour: *V/C* =0.983, LOS E
Int. No. 5: Robertson Blvd./Wilshire Blvd.	A.M. Peak Hour: *V/C* =1.101, LOS F P.M. Peak Hour: *V/C* =1.138, LOS F
Int. No. 12: San Vicente Blvd./Melrose Ave.	A.M. Peak Hour: *V/C* =0.937, LOS E
Int. No. 18: La Cienega Blvd./Beverly Blvd.	A.M. Peak Hour: *V/C* =0.994, LOS E P.M. Peak Hour: *V/C* =1.118, LOS F
Int. No. 19: La Cienega Blvd./Third St.	A.M. Peak Hour: *V/C* =0.929, LOS E P.M. Peak Hour: *V/C* =0.984, LOS E

Int. No. 20: La Cienega Blvd./San Vicente Blvd. A.M. Peak Hour: *V/C* =0.925, LOS E

Int. No. 21: La Cienega Blvd./Wilshire Blvd. A.M. Peak Hour: *V/C* =1.122, LOS F
P.M. Peak Hour: *V/C* =1.145, LOS F

The existing with ambient growth traffic volumes at the study intersections during the A.M. and P.M. peak hours are shown in *Figure 40: Existing with Ambient Growth Traffic Volumes for A.M. Peak Hour* and *Figure 41: Existing with Ambient Growth Traffic Volumes for P.M. Peak Hour*, respectively.

Future Pre-Project Conditions

A forecast of on-street traffic conditions prior to occupancy of the proposed Project was prepared by incorporating the potential trips associated with other known development projects ("Related Projects") within the Project area. With this information, the potential impact of the Project can be evaluated within the context of the cumulative impact of all ongoing development. The list of Related Projects was based on information on file at LADOT, the City of West Hollywood and the City of Beverly Hills, as well as recently accepted traffic impact analysis reports prepared for

Related Projects in the vicinity of the CSMC Campus. The list of Related Projects in the Project area is presented in *Table 29: List of Related Projects*. The location of the Related Projects is shown in *Figure 42: Location of Related Projects*. The list of Related Projects was submitted to LADOT staff for review and approval.

It is important to note that the proposed Project is the addition of 100 inpatient beds (200,000 square feet) to the CSMC Campus to be contained within the West Tower. The West Tower will contain 170,650 square feet of residual entitlement already approved under the Master Plan and covered under the Original EIR, as well as an approved 90,000 square-foot Existing Building that will be demolished and incorporated into the new facility. The 170,650 square feet of remaining entitlement under the Master Plan, as well as the approximately 396,000 square foot Advanced Health Sciences Pavilion (beginning construction on the CSMC Campus in first quarter of 2009), which also utilizes entitlements under the Master Plan, are considered as Related Projects for the purposes of this traffic analysis and for the reasons described in the Methodology above. Further, since the remaining entitlement of the Master Plan is considered as a Related Project in the traffic impact study, the Future Pre-Project Conditions represent the full build-out of the Master Plan on the CSMC Campus without the proposed Project.

Expected traffic volumes from the Related Projects were calculated using rates provided in the ITE *Trip Generation* manual. The Related Projects respective traffic generation for the A.M. and P.M. peak hours, as well as on a daily basis for a typical weekday, is summarized in *Table 30: Related Project Traffic Generation*. The anticipated distribution of the Related Projects traffic volumes to the study intersections during the A.M. and P.M. peak hours is displayed in *Figure 43: Related Projects Traffic Volumes for A.M. Peak Hour and Figure 44: Related Projects Traffic Volumes for P.M. Peak Hour*, respectively. The *V/C* ratios at all of the study intersections are incrementally increased with the addition of traffic generated by the Related Projects listed in

TABLE 29
LIST OF RELATED PROJECTS [1]

MAP NO.	FILE PROJECT NUMBER	PROJECT NAME LOCATION	LAND USE	SIZE	STATUS
CITY OF LOS ANGELES					
LA1	EAF 2000-3349	9051 W Pico Bl	Private School (Pre- K to 5th grade)	42,000 SF	Proposed
LA2	EAF 2001-4993	1016 S La Cienega Bl	Auto Body Shop	17,036 SF	Proposed
LA3	EAF 2004-1143	801 N Fairfax Av	Apartments Retail	93 DU 15,826 SF	Proposed
LA4	EAF 2004-1804	329 S La Cienega Bl	Private School	140 Students	Proposed
LA5	EAF 2004-5880	100 N La Cienega Bl	Condominiums Apartments High Turnover Restaurant Retail	62 DU 177 DU 38,739 SF 316,279 SF	Proposed
LA6	Park La Brea Apartment Addition EAF 2004-7359	6298 W 3rd St	Apartments	300 DU	Proposed
LA7	Wilshire Skyline 2003-CEN-463	6411 W Wilshire Bl	Retail Fast-Food Restaurant Apartments	29,060 SF 2,500 SF 130 DU	Proposed
LA8	Sunset Legacy Lofts	7950 W Sunset Bl	Condominiums Retail	183 DU 12,891 SF	Proposed
LA9	ENV2005-6605MN	8525 W Pico Bl	Apartments Retail	39 DU 11,327 SF	Proposed
LA10	TT-61512	1518 S Shenandoah St	Condominiums	16 DU	Proposed
LA11	ENV 2004-6237-MND	357 N Hayworth Ave	Condominiums	16 DU	Proposed
LA12	ZA-2005-749-ZAA	820 S Bedford St	Condominiums	12 DU	Proposed
LA13	ZA-2005-922-CU	603 N Fairfax Av	Hotel	17 Rooms	Proposed
LA14	ENV 2005-6481-EAF	428 S Willaman Dr	Condominiums	14 DU	Proposed
LA15	ENV 2005-4869-MND	600 S Ridgeley Dr	Condominiums	22 DU	Proposed
LA16	ZA 2005-6576-CUB	8108 W 3rd St	Restaurant	42 Seats	Proposed
LA17	VTT 64813	746 S Masselin Ave	Condominiums	60 DU	Proposed
LA18	VTT 63482	842 N Hayworth Ave	Condominiums	28 DU	Proposed
LA19	TT 64919	418 S Hamel Rd	Condominiums	8 DU	Proposed
LA20	TT 63481	111 S Croft Ave	Condominiums	10 DU	Proposed
LA21	TT 66142	751 S Curson Ave	Condominiums	10 DU	Proposed
LA22	EAF 1998-0305	6120 W Pico Bl	Retail	7,929 SF	Proposed
LA23	EAF 1995-0059	1461 S La Cienega Bl	Fast Food Restaurant w/ Drive-Thru	1,600 SF	Proposed
LA24	EAF 1995-0063	1742 S La Cienega Bl	Fast Food Restaurant w/ Drive-Thru	3,160 SF	Proposed
LA25	EAF 1995-0123	431 S Fairfax Av	Food Court	11,023 SF	Proposed
LA26		8305 W Sunset Bl	Retail Restaurant	2,972 SF 10,300 SF	Proposed
LA27	CPC 2004-1906-ZC-GPA-CU	111 S The Grove Dr	Self-storage facility	139,200 SF	Proposed
LA28	ZA 2005-9141-CUB	189 S The Grove Dr	Restaurant	150 Seats	Proposed

TABLE 29 (CONTINUED)
LIST OF RELATED PROJECTS [1]

MAP NO.	FILE PROJECT NUMBER	PROJECT NAME LOCATION	LAND USE	SIZE	STATUS
CITY OF LOS ANGELES					
LA29	EAF 2003-1206	145 N La Brea Avenue	Shopping Center	18, 610 SF	Proposed
LA30		9760 W Pico Boulevard	Private School Addition	22,000 SF	Proposed
LA31		5500 W Wilshire Boulevard	Apartments	175 DU	Proposed
LA32		7600 W Beverly Boulevard	Museum	8,400 SF	Proposed
LA33		101 S La Brea Avenue	Condominiums Retail Restaurant	118 DU 26,400 SF 3,000 SF	Proposed
LA34	ENV2006-6209EA	725 S Curson Avenue	Office Restaurant	28,800 SF 800 SF	Proposed
LA35		5863 W 3rd Street	Apartments	60 DU	Proposed
LA36		5900 W Wilshire Boulevard	Office High Turnover Restaurant Restaurant	7,000 SF 3,500 SF 15,613 SF	Proposed
LA37		300 S Wetherly Drive	Condominiums	140 DU	Proposed
LA38		1042-1062 S Robertson Boulevard	School Expansion	38,240 SF	Proposed
LA39A		Cedars-Sinai Medical Center Advanced Health Sciences Pavilion	Medical Suites Hospital	121,100 SF 274,900 SF	Proposed
LA39B		Cedars-Sinai Medical Center (Remaining Entitled Development under Ordinance No. 168,847)	Medical Suites Hospital	87,900 SF 82,750 SF	Proposed
LA40	2004-CEN-1000	5600 W Wilshire Boulevard	Apartments Restaurant Retail	288 DU 4,000 GSF 8,500 GLSF	Proposed
LA41	2007-CEN-4579	375 N La Cienega Boulevard	Apartments Retail Retail	125 DU 22,300 GLSF (19,200 GLSF)	Proposed
CITY OF BEVERLY HILLS					
BH1		8800 Burton Way	Office Retail Existing Office	11,700 SF 2,870 SF (1,260 SF)	Proposed
BH2		8800 W Wilshire Bl	Retail Office Existing Office	2,870 SF 11,700 SF (1,260 SF)	Proposed
BH3		9590 W Wilshire Bl	Condominiums Retail	60 DU 12,000 SF	Proposed
BH4		9200 W Wilshire Bl	Condominiums Retail/Restaurant	53 DU 14,000 SF	Proposed
BH5		8600 W Wilshire Bl	Condominiums Medical Office	21 DU 4,800 SF	Proposed
BH6		231 N Beverly Dr	Office/Entertainment	201,000 SF	Proposed
BH7		317-325 S Elm Dr	Condominiums Existing Condominiums	25 DU (8 DU)	Proposed
BH8		447 N Doheny Dr	Condominiums Existing Apartments	23 DU (16 DU)	Proposed
BH9		313-317 S Reeves Dr	Condominiums Existing Apartments	10 DU (4 DU)	Proposed

TABLE 29 (CONTINUED)
LIST OF RELATED PROJECTS [1]

MAP NO.	FILE PROJECT NUMBER	PROJECT NAME LOCATION	LAND USE	SIZE	STATUS
CITY OF BEVERLY HILLS					
BH10		154-168 N La Peer Dr	Condominiums Existing Condominiums	16 DU (6 DU)	Proposed
BH11	Young Israel Synagogue	9261 Alden Dr	Sanctuary Multi-Purpose Room	14,811 SF 1,254 SF	Proposed
BH12	Beverly Hills Public Gardens/ Montage Hotel	202-240 N Beverly Dr	Hotel Condominiums Retail/Restaurants Public Garden	214 Rooms 25 DU 27,000 SF 33,279 SF	Proposed
BH13		265 N Beverly Dr	Office	41,500 SF	Proposed
BH14	Gagossian Gallery	456 N Camden Dr	Retail Expansion	1,750 SF	Proposed
BH15		257 N Canon Dr	Medical Office Surgery Center Retail	23,139 SF 13,609 SF 8,148 SF	Proposed
BH16		338 N Canon Dr	Retail	11,900 SF	Proposed
BH17		131-191 N Crescent Dr	Apartments Retail/Office	88 DU 40,000 SF	Proposed
BH18	Beverly Hills Cultural Center	469 N Crescent Dr	Cultural Center	34,000 SF	Proposed
BH19	Mercedes-Benz Service facility	400 Foothill Rd	Service Facility	53,000 SF	Proposed
BH20		50 N La Cienega Bl	Medical Office Existing Office	14,000 SF (14,000 SF)	Proposed
BH21	BMW	9001 Olympic Bl	New Car Dealer	39,700 SF	Proposed
BH22		326 N Rodeo Dr	Retail	4,550 SF	Proposed
BH23		8536 Wilshire Bl	Medical Office Retail	12,445 SF 12,445 SF	Proposed
BH24		8601 Wilshire Bl	Condominiums	37 DU	Proposed
BH25		8767 Wilshire Bl	Retail/Office	75,000 SF	Proposed
BH26		143-149 N Arnaz Dr	Condominiums	23 DU	Proposed
BH27		216-220 S Arnaz Dr	Condominiums	16 DU	Proposed
BH28		201 N Crescent Dr	Assisted Care Facility	80 DU	Proposed
BH29		155-157 N Hamilton Dr	Condominiums	11 DU	Proposed
BH30		225 S Hamilton Dr	Condominiums Existing Condominiums	27 DU (14 DU)	Proposed
BH31		140-144 S Oakhurst Dr	Condominiums	11 DU	Proposed
BH32		432 N Oakhurst Dr	Condominiums	34 DU	Proposed
BH33		450-460 N Palm Dr	Condominiums	38 DU	Proposed
BH34		437-443 N Palm Dr	Condominiums	13 DU	Proposed
BH35		146 Clark Dr	Retail Condominiums Existing Single-Family Home	500 SF 6 DU (1 DU)	Proposed
HB36		9844 Wilshire Boulevard	Commercial Existing Retail	95,000 SF (9,633 SF)	Proposed
BH37		9754 Wilshire Boulevard	Office Medical Office	24,566 SF 7,977 SF	Proposed

TABLE 29 (CONTINUED)
LIST OF RELATED PROJECTS [1]

MAP NO.	FILE PROJECT NUMBER	PROJECT NAME LOCATION	LAND USE	SIZE	STATUS
CITY OF BEVERLY HILLS					
BH38		9876 Wilshire Boulevard	Residential Existing Non-Hotel Office Existing Hotel Support Existing Hotel	120 DU (13,030 SF) (1,804 SF) (47 Rooms)	Proposed
BH39		129 S. Linden Drive	Senior Congregation	76 DU	Proposed
BH40		9900 Wilshire Boulevard	Condominiums Retail Restaurant	252 DU 15,600 SF 4,800 SF	Proposed
CITY OF WEST HOLLYWOOD					
WH1	TT-62042	928 N Croft Ave	Condominiums	12 DU	Proposed
WH2	ENV 2005-2427-CE	141 S Clark Dr	Condominiums	105 DU	Proposed
WH3	Beverly West Square Commercial Center TIS 1996-0923	Beverly Bl & Doheny Bl	Retail Center	94,000 SF	Proposed
WH4	Sunset Millennium Project TIS 1999-0722	La Cienega Bl & Sunset Bl	Hotel Retail/Restaurant Condominiums	296 Rooms 39,440 SF 189 DU	Proposed
WH5	DMP-004-026	8900 Beverly Bl	Retail Existing Condominiums	39,178 SF (8 DU)	Proposed
WH6	DVP-03-10	901 Hancock Ave	Retail Condominiums Restaurant	12,500 SF 40 DU 3,200 SF	Proposed
WH7	DVP-04-21	1351 Havenhurst Dr	Condominiums	12 DU	Proposed
WH8	DMP 004-013	1342 Hayworth Ave	Apartments Existing Apartments	16 DU (10 DU)	Proposed
WH9	CUP-005-012	723 Huntley Dr	Day Care Center	28 Children	Proposed
WH10	TTM-005-014	1248 Laurel Ave	Condominiums Existing Condominiums	16 DU (6 DU)	Proposed
WH11	TTM-005-024	1238 Larrabee St	Apartments Existing Apartments	15 DU (13 DU)	Proposed
WH12	DVP 04-26	1343 Laurel Ave	Senior Housing	35 DU	Proposed
WH13	TTM 006-001	1350 Hayworth Ave	Condominiums Existing Apartments	17 DU (16 DU)	Proposed
WH14	DMP 005-036	8580 Melrose Ave	Retail Existing Retail	9,995 SF (6,475 SF)	Proposed
WH15	DMP 005-035	8590 Melrose Ave	Retail Existing Retail	6,905 SF (3,523 SF)	Proposed
WH16	DMP-005-014	9061 Nemo St	Mixed-Use (Retail, Office, Condominiums)	9,990 SF	Proposed
WH17	DMP-005-004	923 Palm Ave	Condominiums Existing Condominiums	20 DU (8 DU)	Proposed
WH18	DMP-005-040	8120 Santa Monica Bl	Retail Condominiums	13,830 SF 28 DU	Proposed
WH19	DVP-004-002	8631 Santa Monica Bl	Retail	4,200 SF	Proposed
WH20	DVP-00-56	8788 Shoreham Dr	Condominiums	15 DU	Proposed
WH21	DMP-005-033	8760 Shoreham Dr	Condominiums Existing Single-Family Home	12 DU (1 DU)	Proposed

TABLE 29 (CONTINUED)
LIST OF RELATED PROJECTS [1]

MAP NO.	FILE PROJECT NUMBER	PROJECT NAME LOCATION	LAND USE	SIZE	STATUS
CITY OF WEST HOLLYWOOD					
WH22	Mixed-Use Project DMP-006-008	9040 Sunset Bl	Retail/Restaurant/Office Condominiums Apartments	190,350 SF 61 DU 15 DU	Proposed
WH23	DMP-006-014	612 Westmont Dr	Retail Townhomes	2,900 SF 6DU	Proposed
WH24	DVP-004-018	612-616 Croft Avenue	Condominiums Existing Single-Family Home	11 DU (2 SF)	Proposed
WH25		1200 Alta loma Rd	Hotel Addition	40 Rooms	Proposed
WH26		8783 Bonner Dr	Retail	1,000 SF	Proposed
WH27		1042-1050 N Edinburgh Ave	Condominiums Existing Condominiums	18 DU (8 DU)	Proposed
WH28		1433 Havenhurst Dr	Apartments Existing Apartments	24 DU (3 DU)	Proposed
WH29		8465 Holloway Dr	Condominiums Hotel Restaurant	16 DU 20 Rooms 4,619 SF	Proposed
WH30		825 N Kings Rd	Condominiums Existing Single-Family Home	18 DU (1 DU)	Proposed
WH31		1136-1142 N La Cienega Bl	Condominiums Existing Condominiums	16 DU (2 DU)	Proposed
WH32		1037-1051 N Laurel Ave	Condominiums Existing Condominiums	16 DU (10 DU)	Proposed
WH33		8448 Melrose Ave	Retail	4,000 SF	Proposed
WH34		8525 Melrose Ave	Retail Existing Single-Family Home	9,206 SF (2 DU)	Proposed
WH35		8687 Melrose Ave	Office	400,000 SF	Proposed
WH36		8750 Melrose Ave	Medical Office	120,000 SF	Proposed
WH37	Melrose Triangle	9040-9098 Santa Monica Bl	Condominiums Retail Self-storage Facility Existing Retail	191 DU 71,000 SF 327,000 SF (90,000 SF)	Proposed
WH38		8121 Norton Ave	Condominiums Existing Single-Family Home	16 DU (3 DU)	Proposed
WH39		1220 N Orange Grove Ave	Condominiums Existing Single-Family Home	12 DU (1 DU)	Proposed
WH40		8474-8544 W. Sunset Boulevard	Retail/Restaurant Hotel Residential	39,440 SF 296 Rooms 189 DU	Proposed
WH41	Sunset Olive	8430 W Sunset Bl	Retail Condominiums	35,000 SF 138 DU	Proposed
WH42		8746 W Sunset Bl	Retail	2,323 SF	Proposed
WH43		8873 W Sunset Bl	Retail	9,995 SF	Proposed
WH44		8950-8970 W Sunset Bl	Hotel Condominiums	196 Rooms 4 DU	Proposed
WH45		9016 W Sunset Bl	Medical Office Existing Retail	107,900 SF (11,400 SF)	Proposed
WH46		841-851 Westmount Dr	Condominiums	16 DU	Proposed
WH47		310 N Huntley Dr	Private School	170 Student	Proposed
WH48	TTM 03-01	1146 Hacienda Place	Condominiums Existing Single-Family Home	10 DU (1 SF)	Proposed

TABLE 29 (CONTINUED)
LIST OF RELATED PROJECTS [1]

MAP NO.	FILE PROJECT NUMBER	PROJECT NAME LOCATION	LAND USE	SIZE	STATUS
CITY OF WEST HOLLYWOOD					
WH49	TTM-006-003	1236 Harper Avenue	Condominiums	40 DU	Proposed
WH50	DMP-006-011	9001 Santa Monica Boulevard	Condominiums Retail Restaurant Five Existing Lots	42 DU	Proposed
WH51	DVP-005-059	914 Wetherly Drive	Apartments Condominiums Senior Housing Existing Single-Family Home	28 DU 2 DU 26 DU (2 SF)	Proposed
WH52	DVP-006-006	8969 Santa Monica Boulevard	Supermarket	65,325 SF	Proposed
WH53		8849 W. Sunset Boulevard	Retail	7,726 SF	Proposed
WH54		1140 N. Formosa Avenue	Condominiums	11 DU	Proposed
WH55		329 N. La Cienega Boulevard	Private School	140 Stds.	Proposed
WH56		9062 Nemo Street	Retail Condominiums	20,105 SF 4 DU	Proposed
WH57		365 N. San Vicente Boulevard	Condominiums Senior Housing	135 DU 42 DU	Proposed
WH58		8989 Santa Monica Boulevard	Commercial	70,000 SF	Proposed
WH59		8305 W. Sunset Boulevard	Retail Restaurant	2,972 SF 10,300 SF	Proposed

[1] Sources:
- City of Los Angeles, Departments of Planning and Transportation
- City of Beverly Hills , Planning and Community Development Department
- City of West Hollywood, Planning and Community Development Department
- Impact Sciences, Inc., *Draft Environmental Report, Volume 1, for 9900 Wilshire Project*, August 2007
- Linscott, Law & Greenspan Engineers, *Traffic Impact Study, Westfield Century City for New Century Plan*, September 2007

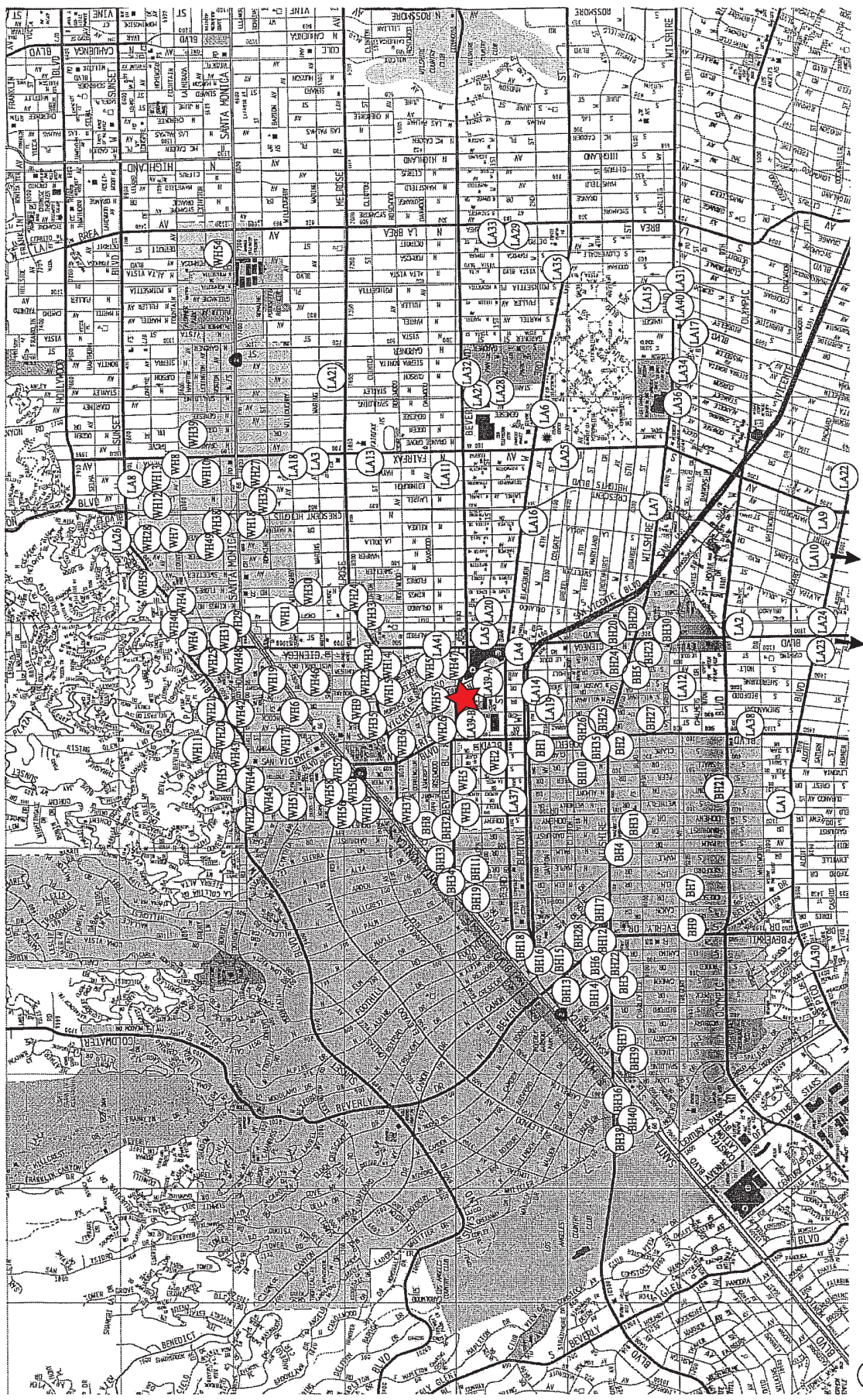


FIGURE 42
LOCATION OF RELATED PROJECTS

SOURCE: THOMAS BROS. GUIDE/
LINSCOTT, LAW & GREENSPAN, ENGINEERS

TABLE 30
RELATED PROJECT TRAFFIC GENERATION [1]

NO.	LAND USE	SIZE	DAILY TRIP ENDS VOLUMES [2]	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
				IN	OUT	TOTAL	IN	OUT	TOTAL
CITY OF LOS ANGELES									
LA1	Private School [3]	42,000 GSF	1,570	275	225	500	140	146	286
LA2	Auto Body Shop [4]	17,036 GLSF	637	33	17	50	29	29	58
LA3	Apartments [5] Retail [6]	93 DU 15,826 GLSF	625 680	9 10	38 6	47 16	38 28	20 31	58 59
LA4	Private School [3]	140 Students	314	69	57	126	40	45	85
LA5	Condominiums [7] Apartments [5] Restaurant [8] Retail [9]	62 DU 177 DU 38,739 GSF 316,279 GLSF	363 1,189 4,926 14,354	5 18 232 190	22 72 214 122	27 90 446 312	21 72 258 643	11 38 165 696	32 110 423 1,339
LA6	Apartments [5]	300 DU	2,016	31	122	153	121	65	186
LA7	Retail [6] Fast-Food Restaurant [10] Apartments [5]	29,060 GLSF 2,500 GSF 130 DU	1,248 1,790 874	18 66 13	12 44 53	30 110 66	52 33 53	57 32 28	109 65 81
LA8	Condominiums [7] Retail [6]	183 DU 12,891 GLSF	1,072 554	14 8	67 5	81 13	64 23	31 25	95 48
LA9	Apartments [5] Retail [6]	39 DU 11,327 GLSF	262 486	4 7	16 5	20 12	16 20	8 22	24 42
LA10	Condominiums [7]	16 DU	94	1	6	7	5	3	8
LA11	Condominiums [7]	16 DU	94	1	6	7	5	3	8
LA12	Condominiums [7]	12 DU	70	1	4	5	4	2	6
LA13	Hotel [11]	17 Rooms	152	6	5	11	6	6	12
LA14	Condominiums [7]	14 DU	82	1	5	6	5	2	7
LA15	Condominiums [7]	22 DU	129	2	8	10	7	4	11
LA16	Restaurant [8]	42 Seats	203	10	10	20	10	8	18
LA17	Condominiums [7]	60 DU	352	4	22	26	21	10	31
LA18	Condominiums [7]	28 DU	164	2	10	12	10	5	15
LA19	Condominiums [7]	8 DU	47	1	3	4	3	1	4
LA20	Condominiums [7]	10 DU	59	1	3	4	3	2	5
LA21	Condominiums [7]	10 DU	59	1	3	4	3	2	5
LA22	Retail [6]	7,929 GLSF	340	5	3	8	14	16	30
LA23	Fast-Food Restaurant [10]	1,600 GSF	794	43	42	85	29	26	55

TABLE 30 (CONTINUED)
RELATED PROJECT TRAFFIC GENERATION [1]

NO.	LAND USE	SIZE	DAILY TRIP ENDS VOLUMES [2]	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
				IN	OUT	TOTAL	IN	OUT	TOTAL
CITY OF LOS ANGELES									
LA24	Fast-Food Restaurant [10]	3,160 GSF	1,568	86	82	168	57	52	109
LA25	Food Court [8]	11,023 GSF	1,402	66	61	127	73	47	120
LA26	Retail [6] Restaurant [8]	2,972 GLSF 10,300 GSF	128 1,310	2 62	1 57	3 119	5 68	6 44	11 112
LA27	Self Storage [12]	139,200 GSF	348	12	9	21	18	18	36
LA28	Restaurant [8]	150 Seats	725	37	34	71	37	26	63
LA29	Retail [6]	18,610 SF	799	12	7	19	34	36	70
LA30	Private School (addition) [24]	14,800 Students	660	92	40	132	37	55	92
LA31	Apartment [5]	175 DU	1,176	18	71	89	71	38	109
LA32	Museum [33]	8,400 SF	30	Nom.	Nom.	Nom.	2	3	5
LA33	Condominiums [7] Retail [6] Restaurant [26]	118 DU 26,400 GLSF 3,000 GSF	691 1,134 270	9 16 1	43 11 1	52 27 2	41 48 15	20 51 7	61 99 22
LA34	Office [14] Retail [6]	28,800 GSF 800 GLSF	317 34	40 1	5 0	45 1	7 1	36 2	43 3
LA35	Apartments [5]	60 DU	403	6	25	31	24	13	37
LA36	Office [14] High Turnover Restaurant [8] Restaurant [26]	7,000 SF 3,500 SF 15,613 SF	77 445 1,404	10 21 7	1 19 6	11 40 13	2 23 78	8 15 39	10 38 117
LA37	Condominiums [7]	140 DU	820	11	51	62	49	24	73
LA38	School Expansion [29]	38,240 SF	554	97	82	179	Nom.	Nom.	Nom.
LA39A	CSMC AHSP [30]	396,000 SF	10,586	527	197	724	263	628	891
LA39B	CSMC Remaining Entitled [30]	170,650 SF	5,324	274	91	365	139	349	488
LA40	Apartment [5] Restaurant [26] Retail [6]	288 DU 4,000 GSF 8,500 GLSF	1,935 360 365	29 2 5	118 1 4	147 3 9	116 20 15	63 10 17	179 30 32
LA41	Apartment [5] Retail [6] Retail [6]	125 DU 22,300 GLSF (19,200) GLSF	840 958 (824)	13 14 (12)	51 9 (8)	64 23 (20)	51 40 (35)	27 44 (37)	78 84 (72)

TABLE 30 (CONTINUED)
RELATED PROJECT TRAFFIC GENERATION [1]

NO.	LAND USE	SIZE	DAILY TRIP ENDS VOLUMES [2]	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
				IN	OUT	TOTAL	IN	OUT	TOTAL
CITY OF BEVERLY HILLS									
BH1	Mixed-Use [13]	14,570 GSF	381	25	3	28	28	85	113
BH2	Retail [6] Office [14] Office (Less Existing) [14]	2,870 GLSF 11,700 GSF (1,260) GSF	123 129 (14)	2 16 (2)	1 2 0	3 18 (2)	5 3 0	6 14 (2)	11 17 (2)
BH3	Condominiums [7] Retail [6]	60 DU 12,000 GLSF	352 515	4 7	22 5	26 12	21 22	10 23	31 45
BH4	Condominiums [7] Retail [6]	53 DU 14,000 GLSF	311 601	4 9	19 5	23 14	19 25	9 28	28 53
BH5	Condominiums [7] Medical Office [15]	25 DU 4,800 GSF	147 173	2 9	9 3	11 12	9 5	4 13	13 18
BH6	Office [14]	201,000 GSF	2,213	275	37	312	51	248	299
BH7	Condominiums [7] Condominiums (Less Existing) [7]	25 DU (8) DU	147 (47)	2 (1)	9 (3)	11 (4)	9 (3)	4 (1)	13 (4)
BH8	Condominiums [7] Apartments (Less Existing) [5]	23 DU (16) DU	135 (108)	2 (2)	8 (6)	10 (8)	8 (7)	4 (3)	12 (10)
BH9	Condominiums [7] Apartments (Less Existing) [5]	10 DU	91 (27)	1 0	7 (2)	8 (2)	6 (1)	3 (1)	9 (2)
BH10	Condominiums [7] Condominiums (Less Existing) [7]	16 DU (6) DU	94 (35)	1 (1)	6 (2)	7 (3)	5 (2)	3 (1)	8 (3)
BH11	Synagogue [16]		127	16	9	25	4	4	8
BH12	Beverly Hill Gardens [17]		2,953	121	73	194	172	134	306
BH13	Office [14]	41,500 GSF	457	56	8	64	11	51	62
BH14	Retail [6]	1,750 GLSF	78	1	1	2	2	3	5
BH15	Medical Office [15] Medical Office [15] Retail [6]	23,139 GSF 13,609 GSF 8,148 GLSF	836 492 350	45 27 5	12 7 3	57 34 8	23 14 15	63 37 16	86 51 31
BH16	Retail [6]	11,900 GLSF	511	7	5	12	22	23	45
BH17	Apartments [5] Office [14]	88 DU 40,000 GSF	591 440	9 55	36 7	45 62	36 10	19 50	55 60
BH18	Cultural Center [16]	34,000 GSF	778	34	21	55	16	40	56
BH19	Service Facility [4]	53,000 GSF	1,767	101	55	156	90	89	179
BH20	Medical Office [15] Office (Less Existing) [14]	14,000 GSF (14,000) GSF	506 (154)	28 (19)	7 (3)	35 (22)	14 (4)	38 (17)	52 (21)

TABLE 30 (CONTINUED)
RELATED PROJECT TRAFFIC GENERATION [1]

NO.	LAND USE	SIZE	DAILY TRIP ENDS VOLUMES [2]	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
				IN	OUT	TOTAL	IN	OUT	TOTAL
CITY OF BEVERLY HILLS									
BH21	New Car Sales [18]	39,700 GSF	1,324	60	21	81	41	64	105
BH22	Retail [6]	4,550 GLSF	195	3	2	5	8	9	17
BH23	Medical Office [15] Retail [6]	12,445 GSF 12,445 GLSF	450 534	24 8	7 5	31 13	12 23	34 24	46 47
BH24	Condominiums [7]	37 DU	217	3	13	16	13	6	19
BH25	Office [14]	75,000 GSF	826	102	14	116	19	93	112
Bh26	Condominiums [7]	23 DU	135	2	8	10	8	4	12
BH27	Condominiums [7]	16 DU	94	1	6	7	5	3	8
BH28	Assisted Living [19]	80 Beds	213	7	4	11	8	10	18
BH29	Condominiums [7]	11 DU	64	1	4	5	4	2	6
BH30	Condominiums [7] Condominiums (Less Existing) [7]	27 DU (14) DU	158 (82)	2 (1)	10 (5)	12 (6)	9 (5)	5 (2)	14 (7)
BH31	Condominiums [7]	11 DU	64	1	4	5	4	2	6
BH32	Condominiums [7]	34 DU	199	3	12	15	12	6	18
BH33	Condominiums [7]	38 DU	223	3	14	17	13	7	20
BH34	Condominiums [7]	13 DU	76	1	5	6	5	2	7
BH35	Retail [6] Condominiums [7] Single-Family Home (Less Existing) [32]	500 GLSF 6 DU (1) DU	21 35 (10)	1 1 0	0 2 (1)	1 3 (1)	1 2 (1)	1 1 0	2 3 (1)
BH36	Beverly Hills Gateway [24]	95,000 SF	1,090	131	(4)	127	21	140	161
BH37	Office [14] Medical Office [15]	24,566 SF 7,977 SF	270 288	33 16	5 4	38 20	6 8	31 22	37 30
BH38	Condominiums [7] Office (Less Existing) [14] Hotel Support (Less Existing) [14] Hotel (Less Existing) [11]	120 DU (13,030) SF (1,804) SF (47) Rooms	703 (143) (20) (384)	9 (18) (3) (16)	44 (2) 0 (10)	53 (20) (3) (26)	42 (3) (1) (15)	20 (16) (2) (13)	62 (19) (3) (28)
BH39	Senior Congregation [27]	76 DU	282	6	9	15	12	8	20
BH40	9900 Wilshire Project [25]		(321)	52	80	132	(6)	(18)	(24)

TABLE 30 (CONTINUED)
RELATED PROJECT TRAFFIC GENERATION [1]

NO.	LAND USE	SIZE	DAILY TRIP ENDS VOLUMES [2]	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
				IN	OUT	TOTAL	IN	OUT	TOTAL
CITY OF WEST HOLLYWOOD									
WH1	Condominiums [7]	12 DU	70	1	4	5	4	2	6
WH2	Condominiums [7]	105 DU	615	8	38	46	37	18	55
WH3	Retail [6]	94,000 GLSF	4,036	59	38	97	169	184	353
WH4	Hotel [11] Retail [6] Condominiums [7]	296 Rooms 39,440 GLSF 189 DU	2,640 1,694 1,108	115 25 14	83 16 69	198 41 83	101 71 66	106 77 32	207 148 98
WH5	Retail [6] Condominiums (Less Existing) [7]	37,178 GLSF (8) DU	1,596 (47)	23 (1)	15 (3)	38 (4)	67 (3)	72 (1)	139 (4)
WH6	Retail [6] Condominiums [7]	12,500 GLSF 40 DU	537 234	8 3	5 15	13 18	23 14	24 7	47 21
WH7	Condominiums [7]	12 DU	70	1	4	5	4	2	6
WH8	Apartments [5] Apartments (Less Existing) [5]	16 DU (10) DU	108 (67)	2 (1)	6 (4)	8 (5)	7 (4)	3 (2)	10 (6)
WH9	Day Care Center [20]	28 Students	125	12	10	22	11	12	23
WH10	Condominiums [7] Condominiums (Less Existing) [7]	16 DU (6) DU	94 (35)	1 (1)	6 (2)	7 (3)	5 (2)	3 (1)	8 (3)
WH11	Apartments [5] Apartments (Less Existing) [5]	15 DU (13) DU	101 (87)	2 (1)	6 (6)	8 (7)	6 (5)	3 (3)	9 (8)
WH12	Senior Housing [21]	35 Occ. DU	122	1	2	3	2	2	4
WH13	Condominiums [7] Apartments (Less Existing) [5]	17 DU (16) DU	100 (108)	1 (2)	6 (6)	7 (8)	6 (7)	3 (3)	9 (10)
WH14	Retail [6] Retail (Less Existing) [6]	9,995 GLSF (6,475) GLSF	429 (278)	6 (4)	4 (3)	10 (7)	18 (12)	19 (12)	37 (24)
WH15	Retail [6] Retail (Less Existing) [6]	6,905 GLSF (3,523) GLSF	297 (151)	4 (2)	3 (2)	7 (4)	12 (6)	14 (7)	26 (13)
WH16	Retail [6]	9,990 GLSF	429	6	4	10	18	19	37
WH17	Condominiums [7] Condominiums (Less Existing) [7]	20 DU (8) DU	117 (47)	2 (1)	7 (3)	9 (4)	7 (3)	3 (1)	10 (4)
WH18	Retail [6] Condominiums [7]	13,830 GLSF 28 DU	594 164	9 2	5 10	14 12	25 10	27 5	52 15
WH19	Retail [6]	4,200 GLSF	180	2	2	4	8	8	16
WH20	Condominiums [7]	15 DU	88	1	6	7	5	3	8

TABLE 30 (CONTINUED)
RELATED PROJECT TRAFFIC GENERATION [1]

NO.	LAND USE	SIZE	DAILY TRIP ENDS VOLUMES [2]	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
				IN	OUT	TOTAL	IN	OUT	TOTAL
CITY OF WEST HOLLYWOOD									
WH21	Condominiums [7] Single-Family Home (Less Existing)	12 DU (1) DU	70 (10)	1 0	4 (1)	5 (1)	4 (1)	2 0	6 (1)
WH22	Retail [9] Condominiums [7] Apartments [5]	190,350 GLSF 61 DU 15 DU	10,319 357 101	140 5 2	90 22 6	230 27 8	459 21 6	498 11 3	957 32 9
WH23	Retail [6] Townhouses [7]	2,900 GLSF 6 DU	125 35	2 1	1 2	3 3	5 2	6 1	11 3
WH24	Condominiums [7] Single-Family Home (Less Existing)	11 DU (2) DU	64 (19)	1 (1)	4 (1)	5 (2)	4 (1)	2 (1)	6 (2)
WH25	Hotel Addition [11]	40 Rooms	357	16	11	27	14	14	28
WH26	Retail [6]	1,000 GLSF	43	1	0	1	2	2	4
WH27	Condominiums [7] Condominiums (Less Existing) [7]	18 DU (8) DU	105 (47)	1 (1)	7 (3)	8 (4)	6 (3)	3 (1)	9 (4)
WH28	Apartments [5] Apartments (Less Existing) [5]	24 DU (3) DU	161 (20)	2 0	10 (2)	12 (2)	10 (1)	5 (1)	15 (2)
WH29	Condominiums [7] Hotel [11] Restaurant [8]	16 DU 20 Rooms 4,619 GSF	94 178 587	1 8 28	6 5 25	7 13 53	5 7 31	3 7 19	8 14 50
WH30	Condominiums [7] Single-Family Home (Less Existing)	18 DU (1) DU	105 (10)	1 0	7 (1)	8 (1)	6 (1)	3 0	9 (1)
WH31	Condominiums [7] Condominiums (Less Existing) [7]	16 DU (2) DU	94 (12)	1 0	6 (1)	7 (1)	5 (1)	3 0	8 (1)
WH32	Condominiums [7] Condominiums (Less Existing) [7]	16 DU (10) DU	94 (59)	1 (1)	6 (3)	7 (4)	5 (3)	3 (2)	8 (5)
WH33	Retail [6]	4,000 GLSF	172	2	2	4	7	8	15
WH34	Retail [6] Single-Family Home (Less Existing)	9,206 GLSF (2) DU	395 (19)	5 (1)	4 (1)	9 (2)	17 (1)	18 (1)	35 (2)
WH35	Office [23]	400,000 GSF	3,879	501	68	569	90	437	527
WH36	Medical Office [15]	120,000 GSF	4,336	235	63	298	120	326	446
WH37	Condominiums [7] Retail [6] Self Storage [12] Retail (Less Existing) [6]	191 DU 71,000 GLSF 32,7000 GSF (90,000) GLSF	1,119 3,049 818 (3,865)	14 45 29 (57)	70 28 20 (36)	84 73 49 (93)	66 128 43 (162)	33 138 42 (176)	99 266 85 (338)

TABLE 30 (CONTINUED)
RELATED PROJECT TRAFFIC GENERATION [1]

NO.	LAND USE	SIZE	DAILY TRIP ENDS VOLUMES [2]	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
				IN	OUT	TOTAL	IN	OUT	TOTAL
CITY OF WEST HOLLYWOOD									
WH38	Condominiums [7] Single-Family Home (Less Existing)	16 DU (3) DU	94 (29)	1 (1)	6 (1)	7 (2)	5 (2)	3 (1)	8 (3)
WH39	Condominiums [7] Single-Family Home (Less Existing)	12 DU (1) DU	70 (10)	1 0	4 (1)	5 (1)	4 (1)	2 0	6 (1)
WH40	Retail/Restaurant [6] Hotel [11] Residential [7]	39,440 SF 296 Rooms 189 DU	1,694 2,640 1,108	25 115 14	16 83 69	41 198 83	71 101 66	77 106 32	148 207 98
WH41	Retail [6] Condominiums [7]	35,000 GLSF 138 DU	1,503 809	22 10	14 51	36 61	63 48	68 24	131 72
WH42	Retail [6]	2,323 GLSF	100	1	1	2	4	5	9
WH43	Retail [6]	9,995 GLSF	429	6	4	10	18	19	37
WH44	Hotel [11] Condominiums [7]	196 Rooms 4 DU	1,748 23	76 0	55 2	131 2	67 1	70 1	137 2
WH45	Medical Office [15] Retail (Less Existing) [6]	10,7900 GSF (11,400) GLSF	3,898 (490)	212 (7)	56 (5)	268 (12)	108 (21)	293 (22)	401 (43)
WH46	Condominiums [7]	16 DU	94	1	6	7	5	3	8
WH47	Private School [3]	170 Students	381	84	69	153	49	55	104
WH48	Condominiums [7] Single-Family Home (Less Existing)	10 DU (1) DU	59 (10)	1 0	3 (1)	4 (1)	3 (1)	2 0	5 (1)
WH49	Condominiums [7]	40 DU	234	3	15	18	14	7	21
WH50	Condominiums [7]	42 DU	246	3	15	18	15	7	22
WH51	Apartments [5] Condominiums [7] Senior Housing [21] Single-Family Home (Less Existing)	28 DU 2 DU 26 Occ. DU (2) DU	188 12 90 (19)	3 0 1 (1)	11 1 1 (1)	14 1 2 (2)	11 1 2 (1)	6 0 1 (1)	17 1 3 (2)
WH52	Supermarket [22]	65,325 GSF	6,679	129	83	212	348	335	683
WH53	Retail [6]	7726 SF	332	5	3	8	14	15	29
WH54	Condominiums [7]	11 DU	64	1	4	5	4	2	6
WH55	Private School [28]	140 Students	347	68	43	111	10	14	24
WH56	Retail [6] Condominiums [7]	20,105 SF 4 DU	863 23	13 0	8 2	21 2	36 1	39 1	75 2

TABLE 30 (CONTINUED)
RELATED PROJECT TRAFFIC GENERATION [1]

NO.	LAND USE	SIZE	DAILY TRIP ENDS VOLUMES [2]	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
				IN	OUT	TOTAL	IN	OUT	TOTAL
CITY OF WEST HOLLYWOOD									
WH57	Condominiums [7] Senior Housing [27]	135 DU 42 DU	791 156	10 3	49 5	59 8	47 7	23 4	70 11
WH58	Commercial [14]	70,000 SF	771	96	13	109	18	86	104
WH59	Retail [6] Restaurant [26]	2,972 SF 10,300 SF	128 926	2 4	1 4	3 8	5 52	6 25	11 77
TOTAL			**152,108**	**5,864**	**4,342**	**10,202**	**6,596**	**7,742**	**14,338**

[1] Source: ITE, *Trip Generation, 7th Edition*, 2003.
[2] Trips are one-way traffic movements, entering or leaving.
[3] ITE Land Use Code 534 (Private School (K-8) trip generation average rates. Please note that no weekday daily trip rates are provided for ITE Land Use 534. As such, a comparison of the ITE Land Use Code 536 (Private School [K-12]) weekday daily and AM peak hour trips rates (2.48 per student and 0.79 per student, respectively) with the AM peak hour trip rate for ITE Land Use Code 534 (i.e., 11.91 per 1,000 SF) was made in order to derive a weekday daily trip rate for this land use: (11.91 / 0.79) x 2.48 = 37.39 trips per 1,000 SF
Similarly, a comparison of the ITE Land Use Code 536 daily and PM peak hour of generator was made to derive a weekday daily trip rate based on number of students: (0.55 / 0.61) x 2.48 = 2.24 trips per student
[4] ITE Land Use Code 942 (Automobile Care Center) trip generation average rates.
[5] ITE Land Use Code 220 (Apartment) trip generation average rates.
[6] ITE Land Use Code 820 (Shopping Center) trip generation average rates.
[7] ITE Land Use Code 230 (Residential Condominium/Townhouse) trip generation average rates.
[8] ITE Land Use Code 932 (High-Turnover [Sit-Down] Restaurant) trip generation average rates.
[9] ITE Land Use Code 820 (Shopping Center) trip generation equation rates.
[10] ITE Land Use Code 934 (Fast-Food Restaurant With Drive-Through Window) trip generation average rates.
[11] ITE Land Use Code 310 (Hotel [Occupied Rooms]) trip generation average rates.
[12] ITE Land Use Code 151 (Mini-Warehouse) trip generation average rates.
[13] Coco Traffic Planners, Inc., *Traffic & Parking Study for the Proposed 8800 Burton Way Mixed-Use Development Project*, February 2006.
[14] ITE Land Use Code 710 (General Office) trip generation average rates.
[15] ITE Land Use Code 720 (Medical-Dental Office Building) trip generation average rates.
[16] Crain & Associates, *Transportation Systems Analysis, UCLA Long Range Development Plan*, October 2002.
[17] Parsons Transportation Group, *Traffic and Parking Impact Analysis for Beverly Hills Gardens and Montage Hotel Project*, November 2003.
[18] ITE Land Use Code 841 (New Car Sales) trip generation average rates.
[19] ITE Land Use Code 254 (Assisted Living) trip generation average rates.
[20] ITE Land Use Code 565 (Day Care Center) trip generation average rates.
[21] ITE Land Use Code 252 (Senior Adult Housing - Attached) trip generation average rates.
[22] ITE Land Use Code 850 (Supermarket) trip generation average rates.
[23] ITE Land Use Code 710 (General Office) trip generation equation rates.
[24] Linscott, Law & Greenspan Engineers, *Traffic Impact Study for Westfield Century City for New Century Plan*,September 2007.
[25] Impact Sciences, Inc., *Draft Environmental Impact Report, Volume I, for 9900 Wilshire Project*, August 2007.
[26] ITE Land Use Code 931 (Quality Restaurant) trip generation average rates.
[27] ITE Land Use Code 251 (Senior Adult Housing - Detached) trip generation average rates.
[28] ITE Land Use Code 536 (Private School [K-12]) trip generation average rates.
[29] ITE Land Use Code 520 (Elementary School) trip generation average rates.
[30] ITE Land Use Code 720 (Medical-Dental Office Building) and Code 610 (Hospital) trip generation average rates. Trip generation increased by 15% to reflect gross building floor area.
[31] ITE Land Use Code 210 (Single Family Detached Housing) trip generation average rates.
[32] The daily traffic volumes and distributational splits for the peak hour traffic volumes is calculated based on other City of Los Angeles Museum daily rates. It is assumed that there is no AM peak hour as the peak hour period during weekdays for Museums generally occur between 12:00 PM and 1:00 PM.

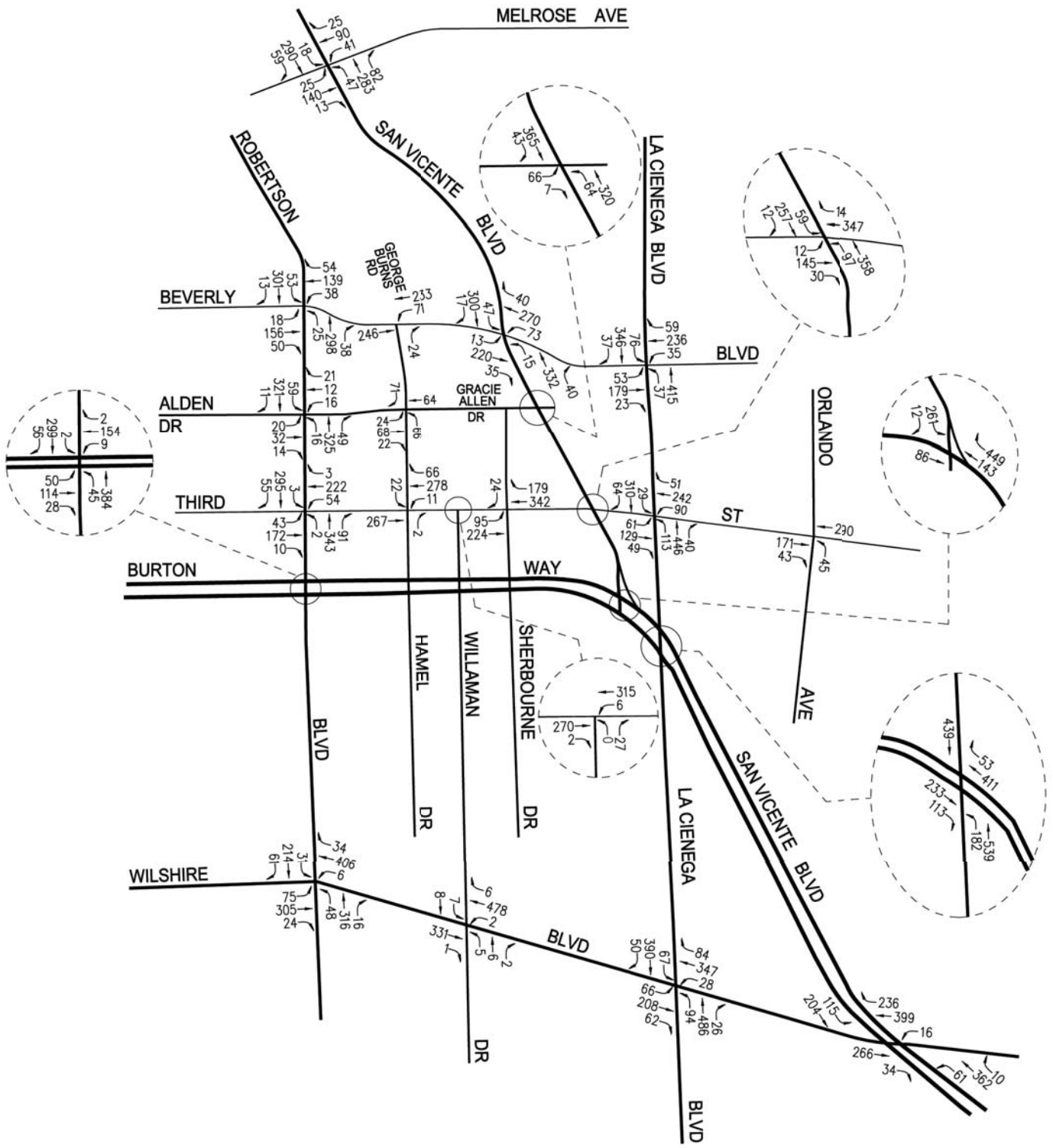


FIGURE 43
RELATED PROJECTS TRAFFIC VOLUME FOR A.M. PEAK HOUR
SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

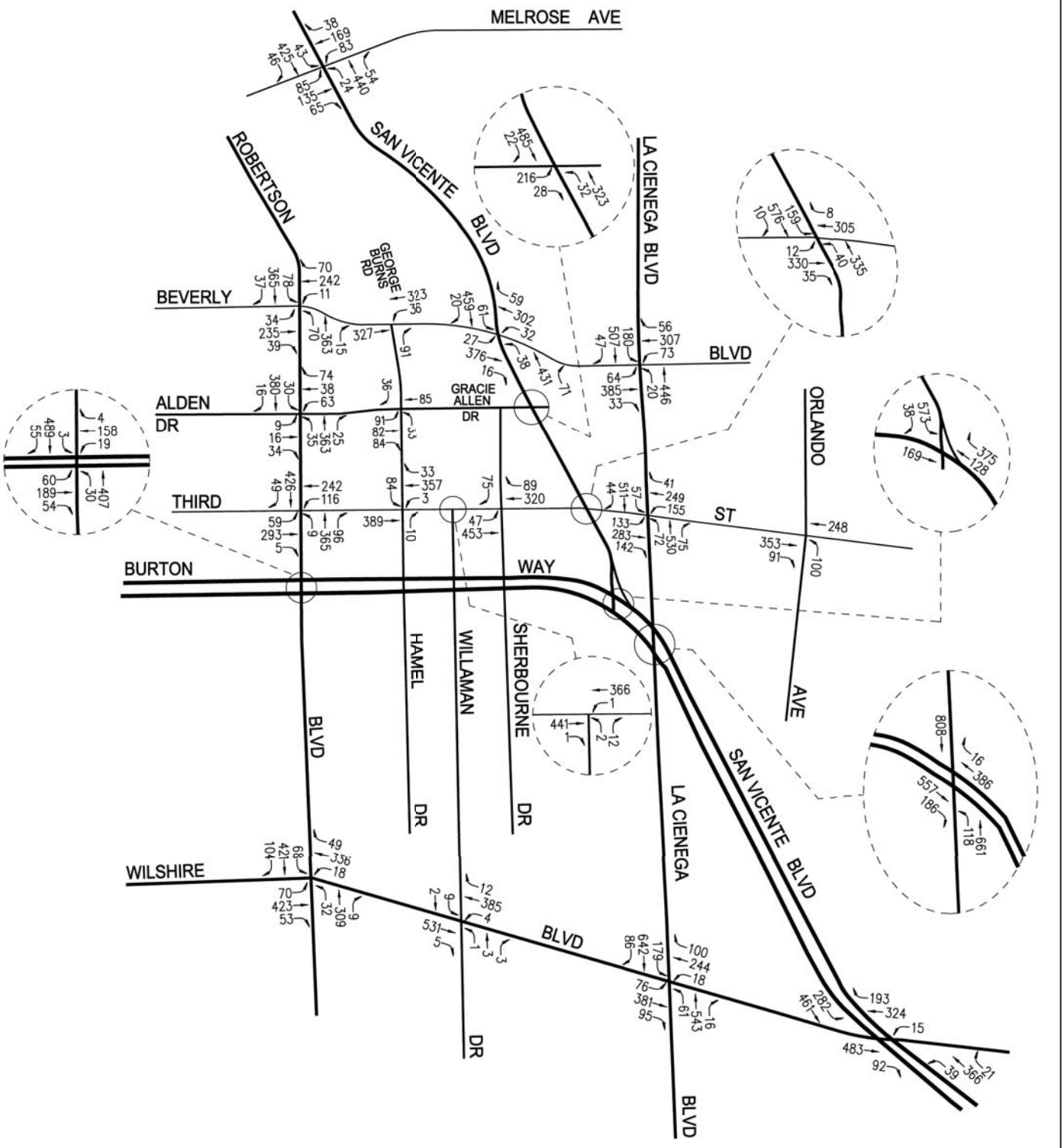


FIGURE 44
RELATED PROJECTS TRAFFIC VOLUME FOR P.M. PEAK HOUR
SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

Table 29: List of Related Projects. As presented in column [3] of *Table 26: Summary of Volume To Capacity Ratios and Levels of Service*, seven of the 22 study intersections are expected to continue operating at LOS D or better during the A.M. and P.M. peak hours with the addition of growth in ambient traffic and the traffic due to the Related Projects. The following 15 study intersections are expected to operate at LOS E or F during the peak hours shown below with the addition of ambient traffic and the traffic due to the Related Projects:

Int. No. 1: Robertson Blvd./Beverly Blvd.	A.M. Peak Hour: *V/C* =1.316, LOS F P.M. Peak Hour: *V/C* =1.232, LOS F
Int. No. 2: Robertson Bl./Alden-Gracie Allen Dr.	P.M. Peak Hour: *V/C* =1.034, LOS F
Int. No. 3: Robertson Blvd./Third St.	A.M. Peak Hour: *V/C* =1.182, LOS F P.M. Peak Hour: *V/C* =1.223, LOS F
Int. No. 4: Robertson Blvd./Burton Way	A.M. Peak Hour: *V/C* =1.262, LOS F P.M. Peak Hour: *V/C* =1.287, LOS F
Int. No. 5: Robertson Blvd./Wilshire Blvd.	A.M. Peak Hour: *V/C* =1.397, LOS F P.M. Peak Hour: *V/C* =1.481, LOS F
Int. No. 6: George Burns Rd./Beverly Blvd.	P.M. Peak Hour: *V/C* =0.929, LOS E
Int. No. 10: Williaman Dr./Wilshire Blvd.	A.M. Peak Hour: *V/C* =0.941, LOS E
Int. No. 12: San Vicente Blvd./Melrose Ave.	A.M. Peak Hour: *V/C* =1.120, LOS F P.M. Peak Hour: *V/C* =1.233, LOS F
Int. No. 13: San Vicente Blvd./Beverly Blvd.	A.M. Peak Hour: *V/C* =1.050, LOS F P.M. Peak Hour: *V/C* =1.100, LOS F
Int. No. 15: San Vicente Blvd./Third St.	A.M. Peak Hour: *V/C* =1.119, LOS F P.M. Peak Hour: *V/C* =1.035, LOS F
Int. No. 16: S. Vicente Bl-LeDoux Rd./Burton Wy.	P.M. Peak Hour: V/C =0.901, LOS E
Int. No. 17: San Vicente Blvd./Wilshire Blvd.	A.M. Peak Hour: *V/C* =1.060, LOS F P.M. Peak Hour: *V/C* =1.010, LOS F
Int. No. 18: La Cienega Blvd./Beverly Blvd.	A.M. Peak Hour: *V/C* =1.192, LOS F P.M. Peak Hour: *V/C* =1.580, LOS F
Int. No. 19: La Cienega Blvd./Third St.	A.M. Peak Hour: *V/C* =1.216, LOS F P.M. Peak Hour: *V/C* =1.369, LOS F

Int. No. 20: La Cienega Blvd./San Vicente Blvd.	A.M. Peak Hour: *V/C* =1.231, LOS F P.M. Peak Hour: *V/C* =1.192, LOS F
Int. No. 21: La Cienega Blvd./Wilshire Blvd.	A.M. Peak Hour: *V/C* =1.450, LOS F P.M. Peak Hour: *V/C* =1.501, LOS F
Int. No. 22: Orlando Ave./Third St.	A.M. Peak Hour: *V/C* =0.958, LOS E P.M. Peak Hour: *V/C* =1.007, LOS F

The Future Pre-Project (existing, ambient growth and Related Projects) traffic volumes at the study intersections during the A.M. and P.M. peak hours are presented in *Figure 45: Future Pre-Project Traffic Volumes for A.M. Peak Hour* and *Figure 46: Future Pre-Project Traffic Volumes for P.M. Peak Hour*, respectively.

The Original EIR found that when traffic from the original Project was combined with existing traffic, a 1.5% ambient growth rate and traffic generated by the Related Projects, it was determined that 10 intersections within the traffic study area would be adversely impacted in the A.M. peak hour and 16 intersections within the traffic study area would be adversely impacted in the P.M. peak hour. Without mitigation, a total of 16 study intersections would operate at LOS E or F in both the A.M. and P.M. peak hours, compared with 10 existing intersections that operated at LOS E or F in 1990 [See Original EIR Findings, Section III.B.11]. The Future Pre-Project Conditions would not represent an incrementally substantial impact above those determined for the Master Plan in the Original EIR.

Summary of Project Impacts and Mitigations (Future With Project Conditions and Future Project With Mitigation Conditions)

As demonstrated in column [4] of *Table 26: Summary of Volume-To-Capacity Ratios and Levels of Service*, application of the City's traffic threshold criteria (see *Table 27: City of Los Angeles Intersection Impact Threshold Criteria*) to the Future With Project scenario indicates that the Project is anticipated to create significant impacts at the following two study intersections:

Int. No. 2: Robertson Blvd./Alden Dr.-Gracie Allen Dr. for A.M. and P.M. peak hours
Int. No. 6: George Burns Rd./Beverly Blvd. for P.M. peak hour

Thus, prior to implementation of the mitigation measures, Intersection No. 2 will be operating at a *V/C* of 0.872 (LOS D) during the A.M. peak hour and 1.063 (LOS F) during the P.M. peak hour. Intersection No. 6 will be operating at a *V/C* of 0.951 (LOS E) during the P.M. peak hour.

As a result, the Project would cause significant impacts for the two intersections. However, with implementation of mitigation measure improvements, the impacts for both intersections will reduce the potentially significant Project-related impacts to less than significant levels.

The following summarizes the recommended transportation mitigation measure improvements for the subject study intersections.

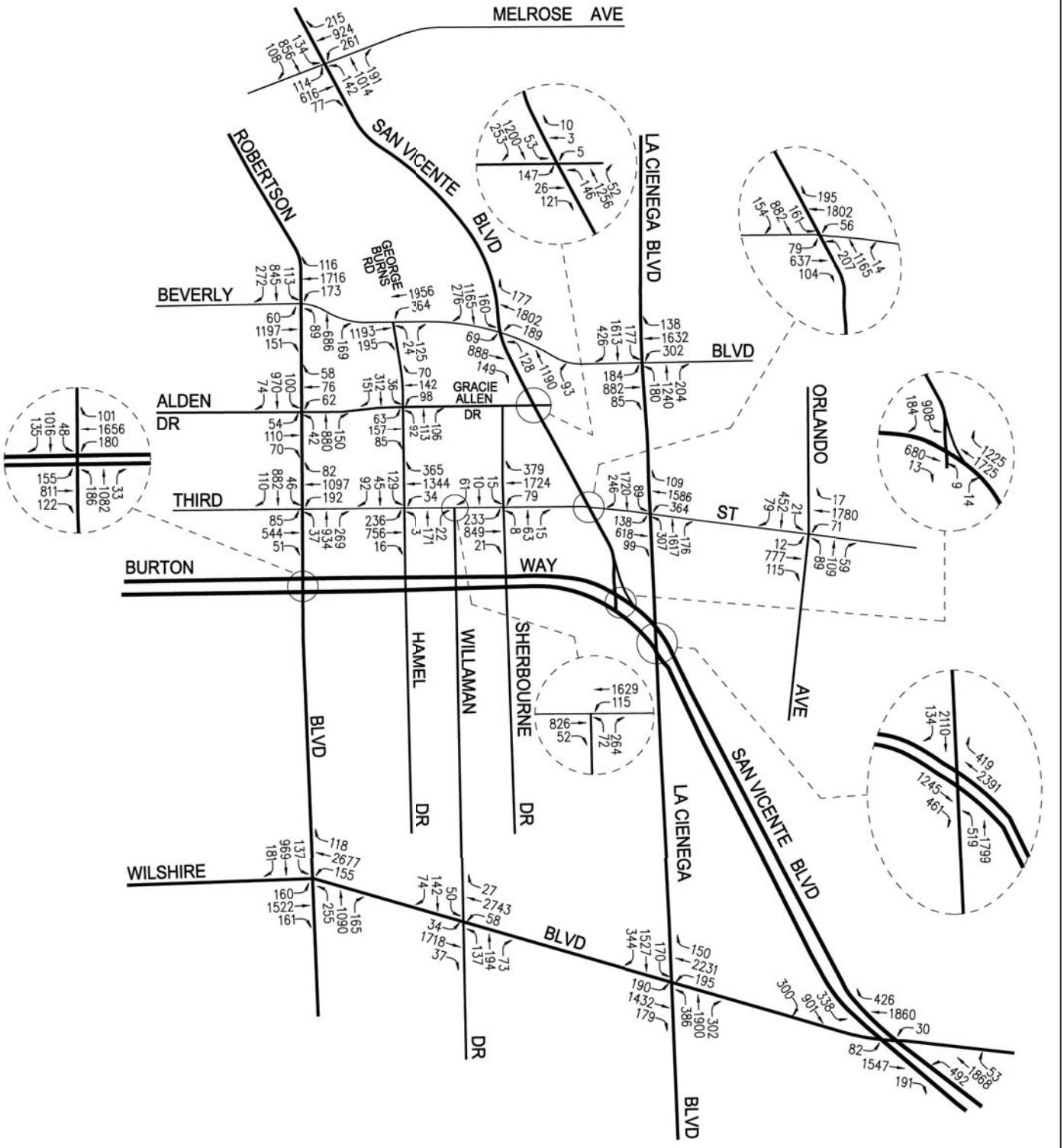


FIGURE 45
FUTURE PRE-PROJECT TRAFFIC VOLUMES FOR A.M. PEAK HOUR
SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

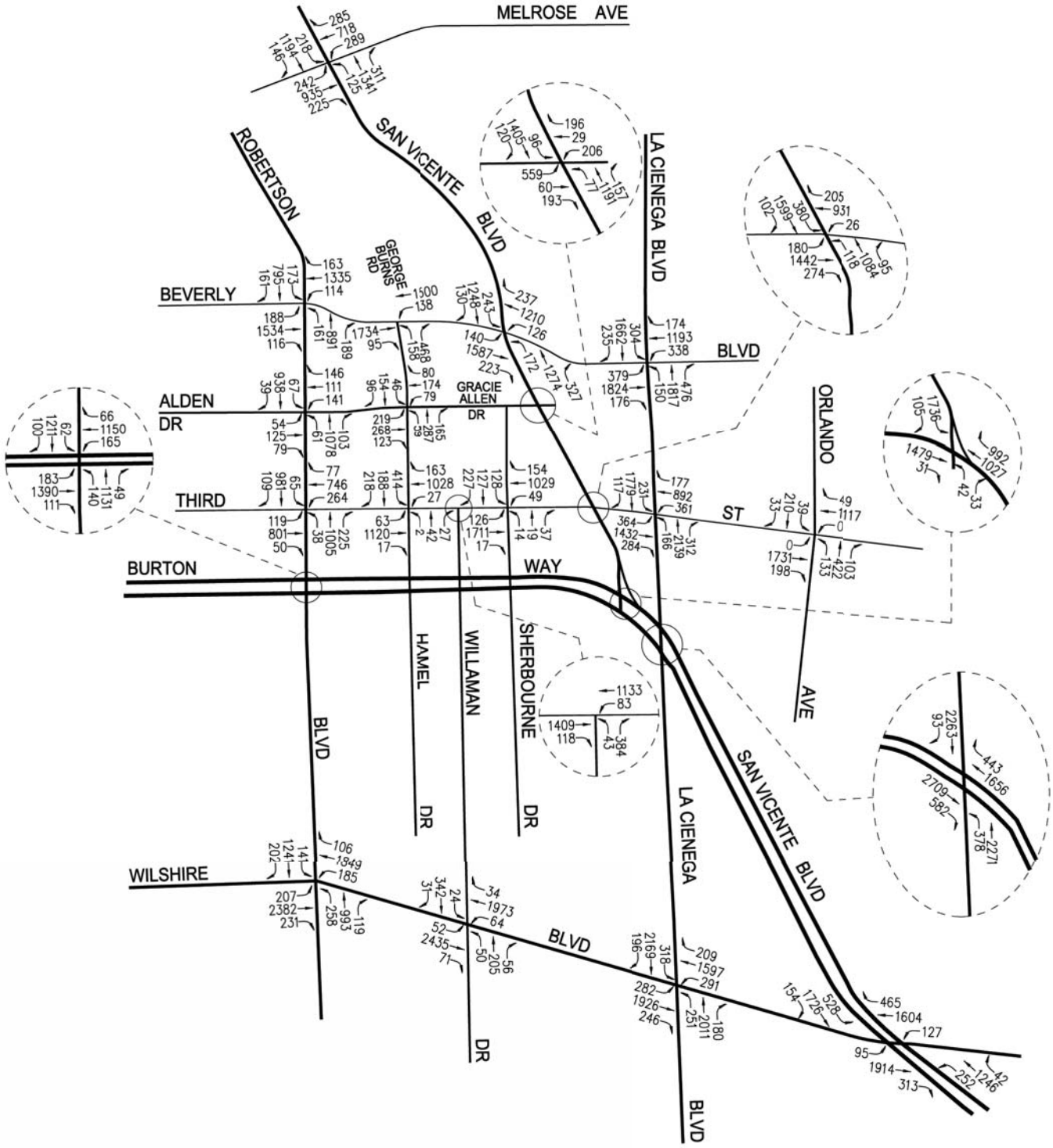


FIGURE 46
FUTURE PRE-PROJECT TRAFFIC VOLUMES FOR P.M. PEAK HOUR
SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

Int. No. 2: Robertson Blvd./Alden Dr.-Gracie Allen Dr.
Provide a right-turn-only lane at the northbound approach of Robertson Boulevard at the Alden Drive-Gracie Allen Drive intersection, as well as a right-turn-only lane at the westbound approach of Alden Drive-Gracie Allen Drive at the intersection. The resultant lane configurations at the northbound approach to the intersection will be one exclusive left-turn lane, one through lane and one right-turn-only lane. The resultant lane configurations at the westbound approach to the intersection will be one shared left-turn/through lane and one right-turn-only lane. These improvement measures would require restriping both the northbound and southbound approaches to the intersection; widening the westbound approach along the north side of Alden Drive-Gracie Allen Drive by 2.5 feet for a distance of approximately 100 feet (not including the transition length back to the existing sidewalk width), thereby reducing sidewalk width from the existing 12.5 feet to 10 feet; as well as the removal of on-street parking along the eastside of Robertson Boulevard south of the intersection for a distance of approximately 130 feet (approximately 6 spaces). Currently, the standard 12.5-foot sidewalk to be affected experiences pedestrian traffic from the surrounding retail and restaurant uses, as well as from CSMC. However, this level of utilization does not exceed the capacity of the sidewalk. As this segment of sidewalk is fairly well utilized by patrons to the shops and restaurants in the area, the proposed measures may result in less than significant secondary impacts in the immediate vicinity of the improvements due to the narrowing of sidewalks and loss of parking spaces.

Currently, a right-turn-only lane at the northbound approach to the intersection on Robertson Boulevard is not warranted by existing right-turn traffic volumes. Therefore, to defer the loss of parking (approximately 6 spaces) on Robertson Boulevard until traffic demands warrant the need for a right-turn-only lane, this mitigation measure should be implemented in two phases. First, the applicant would widen Alden Drive and restripe the westbound approach as proposed above. In the second phase, a traffic warrant analysis would be conducted 2 years after full occupancy of the Project to determine the need for a right-turn-only lane at the northbound approach to the intersection. If warranted, the right-turn-only lane would be implemented on Robertson Boulevard. For visualization, a conceptual roadway mitigation improvement plan for the Robertson Boulevard/Alden Drive-Gracie Allen Drive intersection is contained in *Appendix C of Appendix E: Traffic Impact Study*.

As indicated in column [5] of *Table 26: Summary of Volume To Capacity Ratios and Levels of Service*, this measure is anticipated to reduce the potentially significant Project-related impacts to less than significant levels for both the A.M. and P.M. peak hours. In comparison to the Future Pre-Project Conditions, the Project's proposed mitigation measure improvements for the intersection are expected to improve operations to 0.827 (LOS D) from 0.850 (LOS D) during the A.M. peak hour and to 0.946 (LOS E) from 1.034 (LOS F) during the P.M. peak hour.

Int. No. 6: George Burns Rd./Beverly Blvd.
Provide a right-turn-only lane at the eastbound approach of Beverly Boulevard at the George Burns Road intersection, as well as two lanes at the northbound approach of

George Burns Road at the intersection. The resultant lane configurations at the eastbound approach to the intersection will be one center two-way left-turn lane, two through lanes and one right-turn-only lane. The resultant lane configurations at the northbound approach to the intersection will be one shared left-turn/through lane and one right-turn-only lane. These improvement measures would require widening along the south side of Beverly Boulevard west of the intersection by approximately three feet and the removal of on-street parking for a distance of approximately 55 feet to accommodate the installation of the eastbound right-turn-only lane (approximately 4 parking spaces). The three-foot widening would also reduce the existing sidewalk width from 15 feet to 12 feet, which still exceeds the minimum 8 foot sidewalk for a Major Highway[12], for a distance of approximately 100 feet (not including the transition length back to the existing sidewalk width). Depending on current utilization, these measures may result in a secondary impact in the immediate vicinity of the improvements. For visualization, a conceptual roadway mitigation improvement plan for the George Burns Road/Beverly Boulevard intersection is contained in *Appendix C of Appendix E: Traffic Impact Study*.

As indicated in column [5] of *Table 26: Summary of Volume To Capacity Ratios and Levels of Service*, this measure is anticipated to reduce the potentially significant Project-related impacts to less than significant levels for the P.M. peak hour. In comparison to the Future Pre-Project Conditions, the Project's proposed mitigation measure improvements for the intersection are expected to improve operations to 0.918 (LOS E) from 0.929 (LOS E) during the P.M. peak hour.

While this recommended mitigation measure is feasible, it is noted that this intersection is located in the City of West Hollywood and thus implementation of the recommended mitigation is beyond the control of the Lead Agency (City of Los Angeles). Should the City of West Hollywood not allow the implementation of this recommended mitigation measure, a significant unmitigated impact would result for this intersection and a Statement of Overriding Consideration would be required. However, impacts could still be reasonably mitigated in the future with cooperation of the City of West Hollywood.

The Original EIR analyzed the traffic impacts of the Master Plan development at 18 study intersections in the Master Plan project area. All 18 study intersections have also been analyzed in this Draft SEIR, however, four study intersections have been added to this Draft SEIR, which were not included in the Original EIR:

Int. No. 6: George Burns Rd./Beverly Blvd.
Int. No. 7: George Burns Rd./Gracie Allen Dr.
Int. No. 9: Willaman Dr./Third St.
Int. No. 10: Willaman Dr./Wilshire Blvd.

Excluding the above intersections, in the anticipated Master Plan build-out year of 2005 under the Future With Project Conditions, 16 of the 18 study intersections were anticipated to operate at LOS E or LOS F during the A.M. and/or P.M. peak hours. This finding is more or less consistent with the Future Pre-Project Conditions analyzed above, which account for the full

[12] City of West Hollywood General Plan Section 5.0 Circulation, page 183.

build-out of the Master Plan. Subsequently, these 16 study intersections resulted in significant impacts during the A.M. and/or P.M. peak hours. It was determined that the significant impacts at 15 of the 16 impacted intersections could me mitigated to less than significant levels with implementation of appropriate mitigation measures, as enumerated in the Original EIR[13]. However, the intersection of Sherbourne Dr./Third St. was forecast to result in significant and unavoidable impacts with development of the Master Plan and an SOC was issued.

As discussed, the proposed Project will result in a significant net impact during the A.M. and P.M. peak hours at one of the 18 study intersections analyzed in the Original EIR—Int. No. 2: Robertson Blvd./Alden Drive-Gracie Allen Drive (formerly known as "Robertson Blvd./Alden Dr." in the Original EIR). However, the Project impacts at this intersection may be mitigated to a less than significant level and thus will not add substantial impact above the Master Plan development. The remaining impacted intersection (Int. No. 6: George Burns Rd./Beverly Blvd.) was not analyzed in the Original EIR. However, the impacts at this intersection may also be mitigated to less than significant levels (with cooperation from the City of West Hollywood), and thus will not add substantial impact above the Master Plan development.

Congestion Management Program Traffic Impact Assessment

As required by the CMP, the traffic impact study has been prepared to determine the potential impacts on the designated monitoring locations above. According to Section B.9.1 (Appendix B, Page B-6) of the 2004 CMP manual, the criteria for determining a significant impact is as follows: "A significant transportation impact occurs when the Project increases traffic demand by 2% of capacity ($V/C \geq 0.02$), causing or worsening LOS F ($V/C \geq 1.00$)."

The proposed Project will not add 50 or more trips during the A.M. or P.M. peak hours. The proposed Project will not add 50 or more trips during the A.M. or P.M. peak hours at any of the CMP monitoring intersections. Therefore, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is required.

Also, no CMP freeway monitoring locations have been identified in the Project area. Therefore, no further review of potential impacts to freeway monitoring locations which are part of the CMP highway system is required.

Transportation Demand Management Assessment

City of Los Angeles Ordinance No. 168,847, which approved the Master Plan and Development Agreement for the CSMC Campus, includes two related trip reduction requirements associated with CSMC: 1) Prepare and submit a TDM program to achieve an 18 percent reduction in P.M. peak hour trips above SCAQMD Regulation XV requirements for new facilities and a 9 percent overall P.M. peak hour trip reduction for the entire CSMC Campus, and 2) At the time of Master

[13] As addressed in the Original EIR, mitigation measures proposed at certain intersections were dependent upon concurrent approval and cooperation by the Cities of West Hollywood and Beverly Hills.

Plan build-out, CSMC shall achieve a final Average Vehicle Ridership ("AVR")[14] of 1.8 persons per vehicle for full-time employees.

The measures in the Ordinance are a result of findings in the Original EIR, which estimated that implementation of a TDM program at the CSMC Campus could reduce the potential traffic generation of 2,048 P.M. peak hour trips from facilities proposed under the Master Plan by approximately 25 percent, equivalent to approximately 512 P.M. peak hour trips. Thus, for purposes of mitigation of traffic impacts as determined in the Original EIR, only the 9 percent reduction in overall P.M. peak hour trips was required. The required attainment of a 1.8 AVR for full-time employees was added as a condition of approval of Ordinance 168,847 for purposes of facilitating the 9 percent P.M. peak hour trip reduction.

The Original EIR did not establish a trip generation baseline for the entire CSMC Campus on which to base compliance with the trip reduction requirements in Ordinance 168,847. Therefore, at the direction of LADOT, to verify whether the trip reduction goals are being met by CSMC and to establish a baseline from which the traffic reduction requirements can be compared, P.M. peak hour traffic counts[15] at the CSMC Campus were conducted at the driveways serving existing CSMC parking facilities and at the two parking structures serving the Third Street Medical Office Towers.[16]

Based on the traffic counts, the existing CSMC Campus[17] generates a total of 1,921 P.M. peak hour trips (350 inbound and 1,572 outbound).[18] In contrast, the existing CSMC facilities are forecast to generate at total of 2,994 P.M. peak hour trips, which serves as the baseline for existing CSMC facilities.[19] Thus, the current measured trip generation of the CSMC Campus (1,921 P.M. peak hour trips) is approximately 36 percent less than the estimated baseline (2,994 P.M. peak hour trips) based on existing facilities. This reduction is well in excess of the minimum 9 percent required reduction target for the entire Campus, per Ordinance 168,847.

CSMC currently operates an aggressive TDM program, in which a total of 5,503 employees[20] participate, that has successfully reduced vehicle traffic and parking demand at the CSMC Campus. Pursuant to the most recent rideshare report filed with the SCAQMD, CSMC has also

[14] Average Vehicle Ridership or AVR is the average number of employees who report to a work site divided by the average number of vehicles driven by these employees, calculated for an established time period. This calculation recognizes vehicle trip reductions from telecommuting, compressed work-weeks, and non-motorized transportation.
[15] Traffic counts were conducted during P.M. peak period (4:00 to 6:00 P.M.) on Tuesday, Wednesday and Thursday, June 19, 20, and 21, 2007 respectively.
[16] The Third Street Medical Office Towers parking structures were included because CSMC employees park in these garages and CSMC leases space within these buildings.
[17] For purposes of establishing a true baseline trip generation, "existing" CSMC Campus facilities are considered to be all buildings and structures built and occupied as of the publication of this Draft SEIR, and does not include the Advanced Health Sciences Pavilion which is scheduled to begin construction in the first quarter of 2009.
[18] Linscott, Law & Greenspan Engineers, *Traffic Impact Study, Cedars-Sinai Medical Center Project*, June 23, 2008.
[19] *Ibid.* Based on nationally accepted trip generation rates established in the *Trip Generation Manual, 7th Edition* by the Institute of Transportation Engineers for medical facilities.
[20] Pursuant to CSMC Rule 2202 File 2008, the total current number of employees reporting to the Campus within the designated peak window is 5,503 employees.

attained an AVR among its full-time employees of approximately 1.4 persons per vehicle.[21] In addition to trip reduction programs available to full-time employees, CSMC encourages ridesharing and other programs to part-time and contract employees, as well as to patients and visitors to further reduce vehicle trips during peak commute hours. The TDM program administered by CSMC includes two full-time ride share coordinators, a zip code matching database for ride-sharing, vanpooling, prizes and incentives for ride-sharing, preferential parking for carpoolers and vanpoolers, guaranteed rides home, transit pass subsidies, flexible work schedules, and accessibility to public transportation. Further, the urban nature of the CSMC Campus and surrounding synergistic land uses which support CSMC (such as medical office buildings, retail, and restaurant uses that draw patronage from CSMC) allow for trips made by walking and bicycling. The existing TDM program will incorporate the employees who work in the proposed Project.

As part of the Project, CSMC requests that the 1.8 AVR requirement for full-time employees be eliminated as it has been demonstrated that the required overall Campus trip reductions can be achieved through implementation of travel demand programs for full-time employees and non-CSMC full-time employees (i.e., part-time and contract employees), as well as through development synergies that facilitate trips between CSMC Campus uses through means other than the private automobile. Further, additional scheduling limitations imposed on full-time employees as a result of an AVR requirement could adversely affect CSMC's ability to continue to provide a high level of healthcare to the community. LADOT has concurred that the measurement of AVR for full-time employees can be eliminated, with the provision that all trips that would be potentially eliminated by achievement of the 1.8 AVR be added to the overall CSMC Campus trip reduction target in order to justify the elimination of the requirement.

Build-out of the remaining entitlement under the Master Plan and the proposed Project would increase the Campus-wide forecast trip generation (without a TDM program) from 2,994 P.M. peak hour trips to 4,229 P.M. peak hour trips.[22] Per the requirements of Ordinance 168,847, CSMC would be required to implement a TDM program that would reduce the Campus-wide 4,229 P.M. peak hour trips by 9% (or 381 trips) to 3,848 P.M. peak hour trips. Additionally, per the AVR provisions of the existing Ordinance, CSMC would be required to operate at a 1.8 AVR, thereby reducing the unmanaged forecast of 4,229 P.M. peak hour trips by 804 trips to 3,425 P.M. peak hour trips, which equates to a 19% reduction in P.M. peak hour trips.

If CSMC achieves the 19% reduction in P.M. peak hour trips, LADOT has determined that CSMC can achieve equivalency to the required reductions in traffic generation imposed by Ordinance 168,847 without attaining a 1.8 AVR. Therefore, in lieu of AVR requirements, LADOT has recommended that a more appropriate measurement to meet the goals and requirements of Ordinance 168,847 would be to utilize this 19% target to reduce the number of P.M. peak hour trips generated by the entire CSMC Campus.[23] This reduction target would be

[21] Linscott, Law & Greenspan Engineers, *Traffic Impact Study, Cedars-Sinai Medical Center Project*, June 23, 2008.
[22] Trip generation based on ITE Rates.
[23] The reduction target is deemed "more appropriate" by Los Angeles Department of Transportation (LADOT). *Traffic Impact Study for the Proposed Cedars-Sinai Medical Center (CSMC) Project Located on CSMC Campus (ENV-2008-620-EIR)*, Inter-Departmental Correspondence to Department of City Planning, Jimmy Liao. July 15, 2008.

applied to the entire Campus, with annual reports submitted by CSMC to LADOT to monitor compliance.

The P.M. peak hour reduction target would exceed the trip reduction estimates in both the TDM and AVR analysis in the Original EIR. Therefore, the amended trip reduction target will provide at least equivalent mitigation, and no new impacts, to development of the Master Plan analyzed in the Original EIR. Therefore, assuming compliance with the 19% P.M. peak hour trip reduction target and with LADOT reporting and monitoring requirements, the Project is anticipated to result in less than a significant impact to trip reduction provisions and the existing TDM program.

Residential Street Segment Analysis (Cut-Through Traffic)[24]

A total of 11 residential street segments located in the Project area were analyzed to determine the potential Project-related impacts of non-residential traffic using local streets in adjacent residential neighborhoods (known as cut-through traffic).[25] As shown in *Figure 47: Residential Street Segment Locations*, the analyzed street segments included:

1. Huntley Drive south of Melrose Avenue[26]
2. Rosewood Avenue east of Norwich Drive[26]
3. Ashcroft Avenue west of Sherbourne Drive[26]
4. Rosewood Avenue west of Sherbourne Drive[26]
5. Bonner Drive west of Sherbourne Drive[26]
6. Sherbourne Drive south of Ashcroft Avenue[26]
7. Alden Drive between Swall Drive and Clark Drive[27]
8. Hamel Road between 3rd Street and Burton Way[27]
9. Willaman Drive between 3rd Street and Burton Way[27]
10. Willaman Drive between Burton Way and Colgate Avenue[27]
11. Sherbourne Drive between 3rd Street and Burton Way[27]

Pursuant to the LADOT *Traffic Study Policies and Procedures* manual, a transportation impact on a local residential street shall be deemed significant based on a percentage increase in the Project average daily traffic ("ADT") volumes as shown in *Table 31: Residential Street Segment Impact Threshold Criteria*. It must be noted that the City of West Hollywood and City of Los Angeles use similar traffic analysis methodologies and significance thresholds for determining potential impacts to local residential streets.

[24] Information provided from Linscott, Law & Greenspan Engineers, *Cedars-Sinai Medical Center Project Neighborhood Street Segment Analysis*, memorandum to Planning Associates, Inc., July 23, 2008.
[25] The street segments analyzed were selected based on comments received during the Notice of Preparation process and proximity to the CSMC Campus.
[26] City of West Hollywood street segment.
[27] City of Los Angeles street segment.

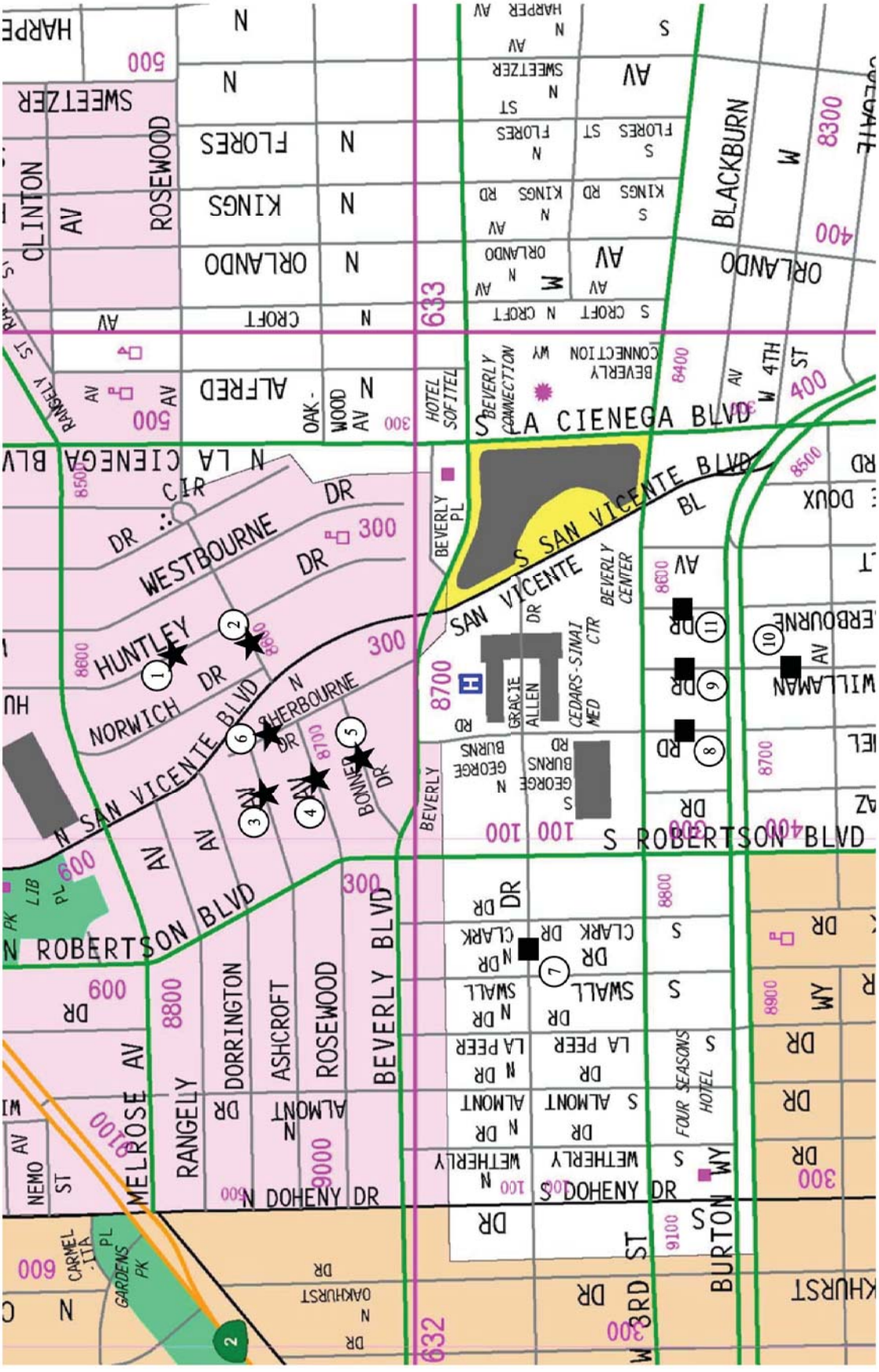


FIGURE 47
RESIDENTIAL STREET SEGMENT LOCATIONS

TABLE 31
RESIDENTIAL STREET SEGMENT IMPACT THRESHOLD CRITERIA

PROJECTED AVERAGE DAILY TRAFFIC WITH PROJECT (FINAL ADT)	PROJECT-RELATED INCREASE IN ADT
0 to 999	16% or more of Final ADT
1,000 or more	12% or more of Final ADT
2,000 or more	10% or more of Final ADT
3,000 or more	8% or more of Final ADT

Similar to the traffic analysis for study intersections, the 11 residential street segments were analyzed for the following conditions:

[a] Existing conditions.

[b] Condition [a] plus 1.5 percent (1.5%) ambient traffic growth per year, including Related Projects, through year 2023 (build-out year) to allow for a conservative forecast of future traffic volumes ("Future Pre-Project Conditions").

[c] Condition [b] with completion and occupancy of the proposed Project ("Future With Project Conditions").

The analyzed street segments are situated within well-established, built-out residential neighborhoods which do not offer many opportunities for direct cut-through traffic. As such, nearly all Project-related traffic is anticipated to travel along the key arterials that provide direct access to the CSMC Campus (i.e., Beverly Boulevard, San Vicente Boulevard, Third Street, and Robertson Boulevard). However, some Project-related motorists may use local residential streets that feed into the CSMC Campus as alternate routes of travel based on perceived convenience and for ease of access, such as Alden Drive, Hamel Drive, Willaman Drive, and Sherbourne Drive. A smaller group of Project-related motorists could potentially use local streets that do not directly feed into the CSMC Campus as part of a short-cut route, including Ashcroft Avenue, Rosewood Avenue, Bonner Drive, and Huntley Drive. The percentage of the Project's estimated 1,181 daily trip ends assigned to each local street segment were dependent upon on the street's current relative traffic volumes, as well as relative access to the CSMC Campus.

In general, on the local streets which do not provide direct access to the CSMC Campus (e.g., street segment nos. 1 through 5), one percent (1.0%) or less, if any, of the total daily trips generated by the Project are expected to utilize these roadways for access. For local streets that feed directly into the CSMC Campus (e.g., street segment nos. 6 through 11), it is reasonable to anticipate that a relatively higher percentage of Project-related trips may occur on these roadways, most likely in the two to four percent (2.0% to 4.0%) range of total daily trips generated by the Project. This relative distribution of the Project-related trips on the local residential streets is consistent with the Project-related traffic distribution pattern on the major arterials (i.e., Beverly Boulevard, Third Street, Robertson Boulevard, and San Vicente Boulevard, etc.) approved for use in the traffic study by LADOT. However, to provide a conservative, "worst case" assessment of the potential Project-related impacts to the local residential streets, a substantially higher use of these roadways was assumed from Project-generated daily trips. As a result, two percent (2.0%) for local streets that do not provide direct

access to the CSMC Campus, and three to eight percent (3.0% to 8.0%) for local streets that provide direct access to the CSMC Campus were used.

The estimated ADT volumes associated with Existing Conditions, Future Pre-Project Conditions, and Future With Project Conditions are shown in *Table 32: Summary of Street Segment Analysis*. By comparing the Future With Project Conditions in column [5] of *Table 32: Summary of Street Segment Analysis* to the Future Pre-Project Conditions in column [2] and the resulting increase of daily trip ends caused by the Project at each street segment (column [4]), the percent ADT growth can be calculated in column [6]. As indicated in column [6], the percentage increase in ADT growth for the 11 street segments ranges from 0.6% to 3.6%. Therefore, application of LADOT's threshold criteria (as shown in *Table 31: Residential Street Segment Impact Threshold Criteria*) indicates that the Project is not anticipated to produce substantial cut-through traffic on local residential streets. Even with an "overstated" assignment of Project-related daily trips on local residential streets, the potential effects are deemed less than significant as the incremental increase in cut-through traffic due to the Project is substantially below the significance thresholds used by LADOT and the City of West Hollywood.

TABLE 32
SUMMARY OF STREET SEGMENT ANALYSIS

	LOCATION	[1] EXISTING WEEKDAY ADT VOLUME	[2] YEAR 2023 FUTURE PRE-PROJ. VOLUME	PROPOSED PROJECT		[5] YEAR 2023 W/PROJ. ADT VOLUME ([2]+[4])	[6] PERCENT ADT GROWTH ([4] /[5])	[7] SEGMENT IMPACT
				[3] TOTAL PROJECT DISTRIB	[4] DAILY PROJECT TRIP ENDS			
1	Huntley Drive south of Melrose Avenue [8]	1,146	1,404	2.0% In/Out	24	1,428	1.7%	NO
2	Rosewood Avenue east of Norwich Drive [8]	3,160	3,871	2.0% In/Out	24	3,895	0.6%	NO
3	Ashcrofl Avenue west of Sherbourne Drive [8]	525	643	2.0% In/Out	24	667	3.6%	NO
4	Rosewood Avenue west of Sherbourne Drive [8]	642	786	2.0% 1n/Out	24	810	3.0%	NO
5	Bonner Drive west of Sherbourne Drive [8]	639	782	2.0% In/Out	24	806	3.0%	NO
6	Sherbourne Drive south of Ashcroft Avenue [8]	1,531	1,875	3.0% In/Out	35	1,910	1.8%	NO
7	Alden Drive between Swall Drive and Clark Drive [9]	2,783	3,409	5.0% In/Out	59	3,468	1.7%	NO
8	Hamel Road between 3rd Street and Burton Way [9]	4,075	4,992	5.0% In/Out	59	5,051	1.2%	NO

TABLE 32 (CONTINUED)
SUMMARY OF STREET SEGMENT ANALYSIS

	LOCATION	[1] EXISTING WEEKDAY ADT VOLUME	[2] YEAR 2023 FUTURE PRE-PROJ. VOLUME	PROPOSED PROJECT [3] TOTAL PROJECT DISTRIB	PROPOSED PROJECT [4] DAILY PROJECT TRIP ENDS	[5] YEAR 2023 W/PROJ. ADT VOLUME ([2]+[4])	[6] PERCENT ADT GROWTH ([4] /[5])	[7] SEGMENT IMPACT
9	Willaman Drive between 3rd Street and Burton Way [9]	5,990	7,338	8.0% In/Out	94	7,432	1.3%	NO
10	Willaman Drive between Burton Way and Colgate Avenue [9]	4,580	5,611	5.0% In/Out	59	5,670	1.0%	NO
11	Sherbourne Drive between 3rd Street and Burton Way [9]	1,906	2,335	5.0% In/Out	59	2,394	2.5%	NO

[1] Existing ADT volumes for study locations 1 through 6 were based on data contained in the Greenwich Place Traffic Impact Study, dated October 2006, prepared by Katz, Okitsu & Associates. The year 2006 traffic counts were adjusted by a 1.5 percent (1.5%) ambient growth factor per year to reflect year 2008 condtions. New ADT counts were conducted for study locations 7 through 11, and copies of the summary count data worksheets are provided in the attached Appendix of Linscott, Law & Greenspan, Engineers, *Cedars-Sinai Medical Center Project Neighborhood Street Segment Analysis*, memorandum to Planning Associates, 23 July 2008.

[2] The existing weekday ADT volumes were adjusted by a 1.5 percent (1.5%) annual ambient growth factor to derive year 2023 Future Pre-Project Conditions.

[3] Total distribution of inbound and outbound daily Project traffic at the analyzed street segment.

[4] Daily Project volume includes inbound and outbound trips based on the proposed Project's net increase of 1,181 daily trip ends (approximately 591 inbound trips and 591 outbound trips).

[5] Total of columns [1] and [3].

[6] Column [3] divided by column [4].

[7] According to LADOT's "Traffic Study Policies & Procedures," March, 2002, page 10: "A local residential street shall be deemed significantly impacted* based on an increase in the projected average daily traffic (ADT) volumes."

Projected Average Daily Traffic with Project (Final ADT)	Project-Related Increase in ADT
0 to 999	16% or more of final ADT**
1,000 or more	12% or more of final ADT
2,000 or more	10% or more of final ADT
3,000 or more	8% or more of final ADT

*Source: Traffic Infusion on Residential Environment (TIRE) Index developed by D.K. Goodrich and modified by LADOT for Los Angeles City conditions.

**Note: For projects in West Los Angeles Transportation Improvement and Mitigation Specific Plan area, use 120 or more trips.

[8] Greenwich Place traffic impact study location.

[9] City of Los Angeles study location.

(b) Project Access

Vehicular Access

Project access refers mainly to vehicular access to the Project through street intersections and external and internal driveways at the Campus. The following five key access intersections provide primary Project Site access:

Robertson Blvd./Alden Dr.-Gracie Allen Dr. (Study Intersection No. 2)
George Burns Rd/Beverly Blvd. (Study Intersection No. 6)

George Burns Rd.-Hamel Rd./Third St. (Study Intersection No. 8)
Sherbourne Dr./Third St. (Study Intersection No. 11)
San Vicente Blvd./Gracie Allen Drive-Beverly Center (Study Intersection No. 14)

There are no changes planned for the five key intersections and external Campus driveways, as approved under the current Master Plan. There are also no changes planned for most internal Campus driveways as approved under the current Master Plan; however, minor modifications are planned for the internal driveway access points at the Project Site to accommodate the Project.

As indicated in *Table 26: Summary of Volume To Capacity Ratios and Levels of Service*, Study Intersection numbers 6, 8, 11 and 14 provide primary project site access and are projected to operate at LOS D or better under the Future With Project Conditions. As also indicated in *Table 26: Summary of Volume To Capacity Ratios and Levels of Service,* the Robertson Boulevard/Alden Drive-Gracie Allen Drive intersection (Study Intersection No. 2) provides primary Project Site access and is projected to operate at LOS F during the P.M. peak hour under the Future With Project Conditions. However, it should be noted that the subject intersection is also forecast to operate at LOS E during the P.M. peak hour under the Future Pre-Project Conditions. Therefore, the proposed Project contributes to the future forecast adverse operating conditions at the Robertson Boulevard/Alden Drive-Gracie Allen Drive intersection and is expected to result in a significant Project access impact based on application of the City's CEQA threshold criteria to the Future With Project scenario.

The Project is expected to create a significant impact at the Robertson Boulevard/Alden Drive-Gracie Allen Drive intersection based on the City's intersection threshold impact criteria during the P.M. peak hour shown with the addition of ambient growth, related projects traffic, and Project-related traffic. Mitigation is available to reduce the forecast intersection and Project access impacts to less than significant levels, as discussed below.

The Original EIR based the level of significance for project access on the elimination or replacement of access points (i.e., external and internal driveways). The Original EIR determined that with implementation of the Master Plan, several access points were being eliminated and replaced, specifically external driveways on San Vicente Boulevard and Third Street and internal driveways on George Burns Road and Sherbourne Drive. Under the Master Plan, the internal driveway on George Burns Road at the Project Site was to be replaced and an additional driveway was to be added. The Original EIR determined that the implementation of mitigation measures generally regarding free travel along private internal Campus streets for emergency, police and fire protection vehicles, as well as provision of safe pedestrian/auto junctures, would reduce access impacts to a less than significant level.

The proposed Project will not substantially differ in access modifications on the Project Site from those proposed under the Master Plan. Additionally, the Project will not affect other Campus access modifications that were proposed under the Master Plan and mitigated in the Original EIR. As similarly planned for the Master Plan development, the Project, as a component of the West Tower, will eliminate the existing driveway access point at the Project Site on George Burns Road and will replace an existing driveway access point at the Project Site on Gracie Allen Drive. Due to the fact that driveway access points were already planned for

modification on the Project Site and mitigated appropriately, the proposed Project will not result in a significant impact and will not substantially increase access impacts above those determined in the Original EIR.

Pedestrian Access and Environment

The pedestrian access and environment on the CSMC Campus includes a network of private internal streets, sidewalks, crosswalks, signage, ground-level entrances to all structures, public transit stops and elevated pedestrian bridge connections between most buildings. As intended under the CSMC Master Plan, all new buildings constructed on the Campus, including the 700,000 square feet of development considered under the Original EIR, as well as the currently proposed Project, are to be designed to provide appropriate access and include those necessary street and sidewalk improvements to comply with all Building Code and Municipal Code regulations. The proposed Project design will comply with all imposed regulations and will include improved and landscaped adjacent sidewalks on the Project Site with ground level access to both the West Tower and the attached parking structure. Handicap access will be provided in compliance with all Americans with Disabilities Act ("ADA") requirements. The Project will also include an elevated pedestrian bridge connection across George Burns Road between the West Tower and the existing North Tower building to the east. The two-story Existing Building on the Project Site does not currently have an elevated pedestrian bridge connection to any neighboring structure on the CSMC Campus, therefore, the proposed Project will improve access at the Campus by allowing easy movement between facilities. The Project will not affect existing pedestrian access on the Campus and no mitigation is required as the Project will, in fact, improve pedestrian access to a beneficial level.

The Wilshire Community Plan includes Urban Design guidelines that address the overall community design of the Project area. The design policies establish a minimum level of design required in private projects and recommendations for public space improvements. With regards to the pedestrian environment, the Urban Design guidelines suggest that the mass, the proportion the scale, the visual interest, the materials and the streetscape associated with the Project must foster an environment of pedestrian orientation. The Project must also preclude opportunities for criminal activity and graffiti. The proposed Project is anticipated to be consistent with the following policies, as suggested in the Urban Design guidelines:

- For building frontages, require the use of offset building masses, recessed pedestrian entries, articulations, and surface perforations, or porticoes. Also require transparent windows (non-reflective, non-tinted glass for maximum visibility from sidewalks into building interiors).

- Require each new building to have a pedestrian-oriented ground floor, and maximize the building area devoted to ground level display windows to afford pedestrian views into lobby space.

- Provide color, lighting, and surface texture accents and complementary building materials to building walls and facades, consistent with neighborhood adjacent architectural themes.

- Locate surface and above grade parking areas to the rear of buildings, with access driveways on side streets, or from rear streets where project buildings cover the majority of block areas.

- Integrate landscaping within pedestrian-friendly plazas, green space, pocket parks, and other open space compliments.

The Project is anticipated to be consistent with all of these guidelines. Preliminary architectural plans for the West Tower indicate that it will contain a large proportion of glass windows at the entrance and ground floor, and throughout the exterior of the building. The entrance of the building will be recessed from the street with a continuous portico along the building frontage. The color, lighting and surface texture of the West Tower will be consistent with those currently existing at other CSMC Campus facilities and will visually remain similar to the character of the Campus. The parking structure adjoining the West Tower will be located to the rear of the building with an access driveway planned on Gracie Allen Drive. Landscaping will be implemented along adjacent variable width sidewalks as well as a rooftop plaza garden. Therefore, due to consistency with several Community Plan Urban Design guidelines regarding pedestrian orientation through building design, the Project is not anticipated to have a significant impact on the pedestrian environment of the CSMC Campus and will prove to be beneficial.

The Original EIR indicated that the preliminary plans for the Master Plan facilities would unify the visual character of the CSMC Campus through architecture and landscaping, similar to the proposed Project. Like the proposed Project, the Master Plan anticipated the demolition of the existing surface parking lot on the Project Site, thereby increasing pedestrian orientation by creating building street frontage. However, whereas the Master Plan proposed a building on the Project Site with a parking structure entrance on the ground floor, the proposed Project is consistent with the Community Plan in that it will provide for ground level display windows into the lobby of the West Tower. Therefore, the pedestrian orientation components of the Master Plan will not be affected or prevented by the Project and will, in fact, be enhanced.

(c) Parking

This section reviews the Project's parking requirements and planned CSMC Campus parking supply according to provisions in the Zone and Height District Change that were approved by the City of Los Angeles in 1993 pursuant to Ordinance No. 168,847. On-street parking located on the surrounding roadways in the Project area is also analyzed. It is anticipated that the Project will provide required parking for the Campus as determined by the City of Los Angeles prior to issuance of a building permit for the Project.

Parking requirements applicable to the CSMC Campus land use components include the following rates:

Administrative, Diagnostic, Imaging and Support Uses:

- 3.3 parking spaces per 1,000 square feet of floor area

Inpatient/ Hospital Uses:

- 2.5 parking spaces per hospital bed

Medical Suite Uses:

- 5.0 parking spaces per 1,000 square feet of floor area

The floor area utilized to determine the parking requirements and referenced in the Ordinance is consistent with Section 12.21 of the Los Angeles Municipal Code, which excludes building floor areas devoted to exterior walls, stairwells, shafts, rooms housing building operating equipment, etc.

It should be noted that the parking supply and requirements for CSMC and the adjacent Third Street Medical Office Towers are considered together by the City, even though the facilities are separately owned and operated. At the time the Medical Office Towers were approved, the City tied their parking requirements to the adjacent CSMC due to anticipated overlapping of parking demand expected to occur between the two facilities (e.g., a doctor on staff at CSMC also leases office space at the Medical Office Towers).

It must also be noted that construction is anticipated to begin on the Advanced Health Sciences Pavilion (at the southwest corner of San Vicente Boulevard and Gracie Allen Drive) in the first quarter of 2009, which will include a total of 547 parking spaces. This Project will also include demolition of 166 parking spaces to accommodate the building, resulting in a net increase in parking of 381 spaces. As the facility will be complete at the time of development of the proposed Project, these parking spaces are considered as existing parking supply on the Campus for the purposes of this Draft SEIR.

Existing CSMC Parking Supply and Requirements

The City of Los Angeles determines parking (required and supply) for a multi-building, institutional environment such as CSMC on a campus-wide basis, rather than on a building-by-building or lot-by-lot basis. The baseline for the existing City required parking and supply for the CSMC Campus was established by the City of Los Angeles in 1993 (per Ordinance No. 168,847). This included Zoning Case Nos. 21332 and 21940, which authorized the development of the Medical Office Towers on Third Street and its associated parking.

As presented in *Table 33: Existing CSMC Campus Parking Summary*, a total of 7,275 parking spaces are currently provided on the CSMC Campus (see note above regarding construction of the Advanced Health Science Pavilion) in accordance with the requirements of Ordinance No. 168,847. This total includes a total of 5,621 spaces in parking facilities controlled by CSMC and a total of 1,654 spaces in the two Medical Office Tower parking structures.

TABLE 33
EXISTING CSMC CAMPUS PARKING SUMMARY

REQUIRED PARKING		
ITEM NO.	**REQUIRED PARKING**	**NO. OF SPACES**
1	Zoning Case 21332 and 21940 (main hospital and 3rd Street MOTS)	3,964
2	Harvey Morse Conference Center (within the South Tower)	179
3	Existing Building at 8723 Alden Drive (including new elevator)	182
4	Comprehensive Cancer Center	81
5	Becker Building (within the North Tower)	22
6	Mark S. Taper Imaging Center	157
7	Davis Research Building Phase 1	456
8	Computer Center (within the Mental Health Center)	48
9	Emergency Room Expansion (within the North Tower)	78
10	Administration/Pediatric Walk-in entrance (within the North Tower)	1
11	Davis Research Building Phase 2	20
12	North Care Tower (180 bed replacement of 201 bed Schuman/Brown buildings)	0
13	Human Resources Trailers	5
14	Advanced Health Sciences Pavilion (396,000 SF): Medical Suites: 121,100 SF x 5.0 spaces/1,000 SF Other: 274,900 SF x 3.3 spaces/1,000 SF	 606 907
TOTAL REQUIRED PARKING		**6,706**
PARKING SUPPLY		
ITEM NO.	**PARKING FACILITY**	**NO. OF SPACES**
1	Parking Lot 1 (site of Research Building)	0
2	Existing Parking Lot (Existing Building lot)	217
3	Mental Health Center (after construction of Computer Center)	95
4	Employee Parking Structure (excluding public meters)	2,140
5	Within Main Hospital Structure (after construction of ER expansion, & Telecomm. remodel)	567
6	Within Service Yard	29
7	3rd St. MOT Parking Structures: 133 S. Sherbourne 8675 W. 3rd St.	 838 816
8	Parking Lot 9 (Cancer Center)	104
9	Parking Lot 7 (Taper)	0
10	Parking Structure 4 (3rd St and San Vicente)	1,922
11	Parking Structure 4 Expanded	547
TOTAL PARKING SUPPLY		**7,275**
PARKING SURPLUS/(DEFICIT)		**569**

Table 33: Existing CSMC Campus Parking Summary also indicates that a total of 6,639 parking spaces are currently required for the CSMC Campus (including the required spaces for the adjacent Medical Office Towers and the Advanced Health Sciences Pavilion).

Therefore, the existing CSMC parking supply of 7,275 spaces currently exceeds the City parking requirement of 6,706 spaces by a total of 569 parking spaces.

Future CSMC Parking Supply and Requirements

An analysis of future parking conditions was prepared for CSMC based on the build-out and occupancy of the proposed Project. Each land use component associated with the Project was assigned a parking requirement as determined by the City of Los Angeles under Ordinance No. 168,847. The demolition of existing parking supply to accommodate the Project was also taken into account. The final anticipated required parking count and parking supply for the CSMC Campus are discussed below.

The proposed Project will modify the existing parking supply on the CSMC Campus through removal of 217 parking spaces in the Existing Parking Lot and development of the new 700-space adjoining parking structure to be constructed as part of the Project. No other modifications to the CSMC parking supply are planned as part of the Project. As such, the Project will increase the parking supply at the CSMC Campus by an approximate net change of 483 spaces as detailed below:

Loss of parking spaces in Existing Parking Lot:	(217) Spaces
Addition of parking spaces in new structure:	700 Spaces
Net increase in CSMC parking supply:	483 Spaces

A summary of the future CSMC Campus parking supply is presented in *Table 34: Future CSMC Campus Parking Summary*, which shows that the parking supply for the CSMC Campus will increase from a existing parking supply of 7,275 spaces to a total of 7,758 spaces.

TABLE 34
FUTURE CSMC CAMPUS PARKING SUMMARY

REQUIRED PARKING		
ITEM NO.	**REQUIRED PARKING**	**NO. OF SPACES**
1	Zoning Case 21332 and 21940 (main hospital and 3rd Street MOTS)	3,964
2	Harvey Morse Conference Center (within the South Tower)	179
3	Existing Building at 8723 Alden Drive (including new elevator)	0 [1]
4	Comprehensive Cancer Center	81
5	Becker Building (within the North Tower)	22
6	Mark S. Taper Imaging Center	157
7	Davis Research Building Phase 1	456
8	Computer Center (within the Mental Health Center)	48
9	Emergency Room Expansion (within the North Tower)	78
10	Administration/Pediatric Walk-in entrance (within the North Tower)	1

TABLE 34 (CONTINUED)
FUTURE CSMC CAMPUS PARKING SUMMARY

ITEM NO.	REQUIRED PARKING	NO. OF SPACES
11	Davis Research Building Phase 2	20
12	North Care Tower (180 bed replacement of 201 bed Schuman/Brown buildings)	0
13	Human Resources Trailers	5
14	Advanced Health Sciences Pavilion (396,000 SF): Medical Suites: 121,100 SF x 5.0 spaces/1,000 SF Other: 274,900 SF x 3.3 spaces/1,000 SF	 606 907
15	Proposed Project: Inpatient Beds: 100 beds (200,000 SF) x 2.5 spaces/bed Medical Suites: 87,900 SF x 5.0 spaces/1,000 SF Other: 82,750 SF x 3.3 spaces/1,000 SF 8723 Alden Drive Medical Building Replacement (90,000 SF)	 250 440 273 182
TOTAL REQUIRED PARKING		**7,669**
PARKING SUPPLY		
ITEM NO.	**PARKING FACILITY**	**NO. OF SPACES**
1	Parking Lot 1 (site of Research Building)	0
2	Existing Parking Lot (Existing Building lot – removed for proposed project)	0[2]
3	Mental Health Center (after construction of Computer Center)	95
4	Employee Parking Structure (excluding public meters)	2,140
5	Within Main Hospital Structure (after construction of ER expansion, & Telecomm. remodel)	567
6	Within Service Yard	29
7	3rd St. MOT Parking Structures: 133 S. Sherbourne 8675 W. 3rd St.	 838 816
8	Parking Lot 9 (Cancer Center)	104
9	Parking Lot 7 (Taper)	0
10	Parking Structure 4 (3rd St and San Vicente)	1,922
11	Parking Structure 4 Expanded	547
12	New Parking Structure 2 (part of proposed project)	700
TOTAL PARKING SUPPLY		**7,758**
PARKING SURPLUS/(DEFICIT)		**89**

Notes:
[1] Assumes removal of the Existing Building at 8723 Alden Drive .
[2] Assumes removal of 217 spaces previously on the Existing Parking Lot at the Project Site.

The City parking requirement calculations for the proposed Project components are as follows:

Removal of Existing Building (90,000 SF): (182 spaces)

Inpatient Beds: 100 beds (200,000 SF) × 2.5 spaces/bed = 250 spaces

Medical Suites: 87,900 SF × 5.0 spaces/1,000 SF = 440 spaces

Other:	82,750 SF × 3.3 spaces/1,000 SF =	273 spaces
Replacement of Existing Building floor area (90,000 SF):		182 spaces
Total Required Parking		963 Spaces[28]

However, as discussed above, the parking for the proposed Project need not be located on the Project Site and is not analyzed as a separate entity; rather, the parking need only be located within the CSMC Campus and analyzed in combination with all other parking on the CSMC Campus. Based on the parking requirements for the planned development program, the future City parking requirement for the CSMC Campus will be 7,669 spaces. This is based on the existing City requirement of 6,706 spaces and the future Code requirement of 963 spaces for the planned development program (6,706 + 963 = 7,669 spaces).

Therefore, as presented in *Table 34: Future CSMC Campus Parking Summary*, the planned CSMC Campus parking supply of 7,758 spaces will exceed the City parking requirement of 7,669 spaces by a total of 89 spaces. However, it must be noted as reflected in *Table 33: Existing CSMC Campus Parking Summary* and *Table 34: Future CSMC Campus Parking Summary*, the Project will result in a reduction in the Campus-wide parking surplus by 480 parking spaces (from 569 surplus parking spaces to 89 surplus spaces).

With respect to the Master Plan, the Original EIR proposed a total CSMC Campus parking supply after development of the Master Plan of 7,053 parking spaces.[29] This total number of proposed spaces included the 3,200 parking spaces approved under the Master Plan, as well as all parking spaces existing before approval of the Master Plan. The proposed Project now proposes a total CSMC Campus parking supply after the amendment to the Master Plan of 7,758 parking spaces, which includes the additional 50 parking spaces in the adjacent parking structure that were not previously approved on the Project Site. Therefore, the Project will provide for an additional 705 parking spaces on the CSMC Campus above the parking supply proposed under the Master Plan, resulting in a benefit to CSMC facilities and no incremental parking impacts beyond those determined for the Master Plan in the Original EIR.

Future On-Street Parking

The proposed mitigation measures for the two significantly impacted study intersections (Int. No. 2 and Int. No. 6) will require the removal of up to 10 on-street parking spaces along the east side of Robertson Boulevard and the south side of Beverly Boulevard. Under the Master Plan development, the Original EIR anticipated removal of a total of between 55 and 64 parking spaces along various roadways in the Project area as recommended through mitigation measures. The loss of these parking spaces was determined to have a significant adverse effect for on-street

[28] As the replacement floor area associated with the proposed removal of the Existing Building will equal the current floor area, there is no net change to its parking requirement of 182 spaces.

[29] It should be noted that although 7,053 parking spaces were originally proposed for the CSMC Campus under the Master Plan, 222 extra spaces have since been built on the CSMC Campus, resulting in the current Campus parking supply of 7,275 parking spaces (including parking to be built as part of the Advanced Health Sciences Pavilion).

parking. The proposed removal of up to 10 on-street parking spaces on Robertson Boulevard and Beverly Boulevard may result in an adverse effect to surrounding commercial businesses whose patrons depend on the on-street parking. However, the adverse effects of the Project are not anticipated to be incrementally substantial beyond the impacts found for the Master Plan in the Original EIR

(d) Transit System

The Project trip generation, as shown in *Table 28: Project Traffic Generation*, was adjusted by values set forth in the CMP (i.e., person trips equal 1.4 times vehicle trips, and transit trips equal 3.5 percent of the total person trips) to estimate transit trip generation. Pursuant to the CMP guidelines, the Project is forecast to generate demand for 6 transit trips (4 inbound and 2 outbound trips) during the weekday A.M. peak hour and 7 transit trips (3 inbound trips and 4 outbound trips) during the weekday P.M. peak hour. Over a 24-hour period, the Project is forecast to generate demand for 58 daily transit trips. The calculations are as follows:

A.M. Peak Hour = 113 × 1.4 × 0.035 = 6 Transit Trips
P.M. Peak Hour = 130 × 1.4 × 0.035 = 7 Transit Trips
Daily Trips = 1,181 × 1.4 × 0.035 = 58 Transit Trips

Approximately 11 bus transit lines and routes are provided adjacent to or in close proximity to the Project Site, with 10 of these transit lines and routes directly serving the Site. A total of three different bus transit providers provide service within the Project study area. These 11 transit lines provide service for an average (i.e., an average of the directional number of buses during the peak hours) of approximately 93 buses during the A.M. peak hour and roughly 94 buses during the P.M. peak hour. Thus, based on the above calculated peak hour transit trips, this would correspond to less than one additional Project-related transit rider per bus. Therefore, it is anticipated that the existing transit service in the Project area would adequately accommodate the Project generated transit trips.

The Original EIR found that development of the Project might disrupt bus service at Third Street and at the corner of Alden Drive and San Vicente Boulevard, but that after mitigation, any significant impacts associated with this disruption would be less than significant [Original EIR Findings, Section III.B.10(d)]. In comparison, the net incremental impact resulting from the proposed Project is not substantial and will not add substantial impact above the Master Plan development. Therefore, given the low number of generated transit trips per bus, no significant impacts on existing or future transit services in the Project area are expected to occur as a result of the Project.

(3) Consistency with Adopted Plans and Policies

As previously discussed, the Wilshire Community Plan is the primary guiding document for development in the Project area. The proposed Project will be consistent with a number of goals, objectives and policies relating to transportation set forth in the Community Plan, including:

- Objective No. 10-1: Continue to encourage improved and additional local and express bus service and neighborhood shuttles throughout the Wilshire Community Plan Area.

- Policy No. 13-1.5: Identify and implement intersection improvements (channelization, turn lanes, signal modifications) on all Major Class II and Secondary Highways, and along some Collector Streets, throughout the Wilshire Community Plan Area.

- Policy No. 15-1.2: Develop off-street parking resources, including parking structures and underground parking in accordance with design standards.

- Policy No. 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.

A determination and discussion of consistency with the goals, objectives and policies of the Community Plan is provided below.

Objective No. 10-1 of Goal No. 10. This Objective encourages improved and additional bus service in the Community Plan area. Although the proposed Project does not take credit for improved or additional bus service in the Project area, the CSMC Campus, as a whole, has proposed to implement additional transit stops on the periphery of the Campus along the south side of Beverly Boulevard and the west side of San Vicente Boulevard. Additionally, pursuant to the Master Plan and Development Agreement, CSMC has agreed with the City to provide an easement on Campus property for a portal to a potential Metro Rail station at the southwest corner of San Vicente Boulevard and Beverly Boulevard provided that the easement does not adversely impact operation of the CSMC, as determined by CSMC. As the Project is located approximately 450 feet west of the Metro portal site, blocked by several interfering buildings, the Project is not anticipated to be impacted by or cause impact to the potential Metro station, should it be developed. However, any anticipated transit riders of the Project will have access to these proposed and potential transit services and are expected to utilize them accordingly.

Policy No. 13-1.5, Objective No. 13-1 of Goal No. 13. The Community Plan specifies the provision to "Identify and implement intersection improvements (channelization, turn lanes, signal modifications) on all Major Class II and Secondary Highways, and along some Collector Streets, throughout the Wilshire Community Plan Area." As discussed, the proposed Project will result in a significant impact at two study intersections that involve one Secondary Highway—Robertson Boulevard (Int. No. 2 with Alden Drive-Gracie Allen Drive) and one Major Highway Class II—Beverly Boulevard (Int. No. 6 with George Burns Road). However, traffic impacts at these two intersections may be mitigated to a less than significant level with measures that are consistent with Policy 13-1.5 of the Community Plan, including the addition of turn lanes and restriping to improve traffic flow and congestion (see Mitigation Program below). Therefore, the Project with mitigation measures will be consistent with the Community Plan goal to maintain a safe and efficient highway and street network. It must be noted that implementation of some of the mitigation measures for Intersection No. 6 may not be feasible as their implementation would require approval and cooperation with the City of West Hollywood. Therefore, the net impact of

the Project would remain significant and a Statement of Overriding Considerations would be required. However, impacts could still be reasonably mitigated in the future with cooperation of the City of West Hollywood.

Policy No. 15-1.2, Objective 15-1 of Goal No. 15. This Policy posits the development of "off-street parking resources, including parking structures and underground parking in accordance with design standards." As approved under the existing Master Plan and analyzed under the Original EIR, in conjunction with the proposed West Tower, the Project Site will contain a seven-level, 700-space, partially subterranean parking structure to serve the proposed Project and the CSMC Campus. The parking structure will be designed in accordance with all Building Code and Municipal Code regulations. Therefore, the Project will be consistent with the goals of the Community Plan relating to off-street parking.

Policy No. 16-1.1, Objective 16-1 of Goal No. 16. This Policy stipulates the need to maintain a satisfactory Level of Service above LOS D for Class II Major Highways, Secondary Highways, and Collector streets in the Community Plan area. As analyzed previously, in the year 2023 (the anticipated year of full occupancy of the West Tower), without development of the proposed Project and under forecast ambient growth only, several of the 22 study intersections will be operating at LOS E or LOS F. Including construction of Related Projects in the area, without the West Tower, several more intersections will be operating below LOS D. The proposed West Tower Project, with implementation of mitigation measures, at the intersections of Robertson Boulevard/Alden Drive-Gracie Allen Drive and George Burns Road/Beverly Boulevard, is anticipated to result in less than significant impact levels. Again as noted above, cooperation with and approval by the City of West Hollywood on the proposed mitigations at the George Burns Road/Beverly Boulevard intersection will be required, otherwise a significant impact will result. Therefore, with implementation of mitigation measures, the proposed Project would be consistent with the goals of the Community Plan relating to LOS.

In comparison to the analysis of the Master Plan in the Original EIR, the Master Plan did not have any negative impacts on the applicable adopted plans and policies, including the Wilshire Community Plan. No mitigation measures were required as a result. The entitlements and development associated with the proposed Project are not anticipated to result in impacts that are substantially beyond those determined in the Original EIR for the Master Plan. Therefore, the Project is not anticipated to be inconsistent with the applicable adopted plans and policies and no mitigation will be required to ensure conformance.

d. Cumulative Impacts

The analysis of cumulative impacts was completed concurrent with the Project impacts analysis(existing conditions plus ambient growth plus Related Projects development plus Project with mitigation measures) and is included in the discussion above. Further discussion of cumulative impacts for the Project are found in *Section IV.E: Cumulative Effects.*

In the Original EIR, the Master Plan was anticipated to result in a cumulative traffic impact of 206,400 vehicle trips per day. Of the 18 study intersections, 10 were found to result in a significant impact during the A.M. peak hour and 16 would result in a significant impact during

the P.M. peak hour. However, it was determined that the significant impacts during the A.M. peak hour could be mitigated to less than significant levels at all intersections. During the P.M. peak hour, the significant impacts could be mitigated to less than significant levels with the exception of the intersection at Sherbourne Drive and Third Street, for which a significant and unavoidable impact was found. The Original EIR also determined that a cumulative impact would result for Project parking, but not for Project access. Although parking and Project access impact levels are determined on a project-by-project basis (campus-wide basis in the case of the CSMC Campus) and not on a City-wide cumulative basis, due to the high level of development in the area, the subsequent high parking demand and the potential impacts caused by Related Projects, the parking was anticipated to result in a significant cumulative impact.

The proposed Project could result in cumulative significant impacts at two study intersections, but both could be mitigated to less than significant levels, thus eliminating contribution to a cumulative impact. The Project does not represent an incrementally substantial impact above those determined for the Master Plan. The proposed Project is also not anticipated to have significant impacts on either parking or Project access and thus will not substantially increase cumulative impacts beyond the Master Plan.

4. MITIGATION PROGRAM

a. Regulatory Requirements, Standard Conditions and Project Design Features

The following is a list of standard measures that will be required for the Project in accordance with City of Los Angeles Code requirements.

MM TRF-1: In accordance with Los Angeles Municipal Code ("LAMC") Section 91.70067, hauling of construction materials shall be restricted to a haul route approved by the City. The City of Los Angeles will approve specific haul routes for the transport of materials to and from the site during demolition and construction.

b. 1993 Mitigation Measures (Carried Forward)

The following is a list of previous mitigation measures recommended by the Original EIR and by Ordinance No. 168,847, which were required for development of the 700,000 square feet of the Master Plan. Many of these measures have been implemented with development approved under the Master Plan or will be implemented prior to the issuance of a Certificate of Occupancy for the Advanced Health Sciences Pavilion (Related Project No. LA39A), which will begin construction in the first quarter of 2009. Many mitigation measures are followed by a statement indicating if the measure has been implemented or is being implemented as part of the Advanced Health Sciences Pavilion. Those without a status statement have been implemented with each new building developed at the CSMC Campus and will be required for the proposed Project as well.. Those mitigation measures labeled as "MM TRF-N/A" will not be required as part of the proposed Project and therefore will not be assigned a number.

(1) Traffic

MM TRF-2: The applicant shall submit site plans to the Department of Transportation (LADOT) and the Bureau of Engineering for approval prior to the issuance of any foundation permit. The site plans shall include highway easements, access locations, and adjacent street improvements.

MM TRF-3: Applicant shall prepare and submit a Transportation Demand Management ("TDM") plan to LADOT which will contain measures to achieve a 19 percent reduction in overall P.M. peak hour trips for the entire Cedars-Sinai Medical Center. This plan shall be submitted to and must be approved by LADOT prior to the issuance of any building permits. The TDM Plan shall include, but not be limited to, the following features: transportation allowance, provision of preferential parking for carpools/vanpools, additional financial incentives, purchase of bicycles and related equipment for employees, increased employee participation in Compressed Work Week schedules, expanded employee benefits, visitor transit incentives, and a Guaranteed Ride Home program for ridesharers. Prior to the issuance of any building permit, the applicant shall execute and record a covenant to the satisfaction of DOT guaranteeing implementation of the DOT approved TDM Plan.

Status: CSMC currently has a TDM program which will be amended to incorporate the employees associated with the West Tower. As such, this measure will be required for the proposed Project.

MM TRF-N/A: The applicant shall contribute to the design and installation of an Automated Traffic Surveillance and Control (ATSAC) system at the intersections of: Robertson Boulevard and Wilshire Boulevard; La Cienega Boulevard and Wilshire Boulevard; and Orlando Avenue and Third Street.

Status: The Applicant has made the contribution for the design and installation of ATSAC systems at these intersections; therefore, this measure will no longer be required for the proposed Project.

Improvement plans for the following intersections have been approved by the Cities of Los Angeles and Beverly Hills. Implementation of these improvements will be completed prior to issuance of a Certificate of Occupancy for the Advanced Health Sciences Pavilion. As such, several of these measures will not be required for the proposed Project.

MM TRF-N/A: San Vicente Boulevard and Melrose Avenue: The existing Melrose Avenue single lane eastbound approach should be restriped to provide a left turn lane, a through lane, and an optional through/right turn lane. This would require the removal of approximately 10 parking spaces on Melrose Avenue west of San Vicente Boulevard. An alternative mitigation proposal could be to provide two eastbound lanes on the approach to the San Vicente Boulevard intersection. This plan would result in the removal of only one parking space

on the south side of Melrose avenue east of San Vicente Boulevard. The implementation of the above mitigation requires improvements within the city of West Hollywood. As a result, concurrent approval from the city of West Hollywood is required.

Status: This measure has been completed and will not be required for the proposed Project.

MM TRF-N/A: San Vicente Boulevard between Beverly Boulevard and Burton Way: Restripe San Vicente Boulevard for an additional north and southbound lane during the AM and PM peak traffic periods by posting peak hour parking restrictions (or full time parking prohibitions). A red curb may not be acceptable because of the loss of street parking. However all the lost parking spaces in the City of Los Angeles are adjacent to the developer's property. A total of four parking spaces will be lost in West Hollywood, while a total of 26 spaces will be lost in the City of Los Angeles. Traffic impacts will be fully mitigated at the intersections of San Vicente and Beverly Boulevard. However the intersections of San Vicente Boulevard at Third Street and the San Vicente Boulevard at Alden Drive require the additional application of 25 percent TDM to fully mitigate these intersections. The implementation of the above mitigation requires improvements within the City of West Hollywood. As a result, concurrent approval from the City of West Hollywood is required.

Status: This measure has been completed and will not be required for the proposed Project.

MM TRF-N/A: Beverly Boulevard between San Vicente Boulevard and La Cienega Boulevard: Restripe Beverly Boulevard eastbound for an additional through lane which becomes an optional through/right-turn lane at La Cienega Boulevard. This requires no additional street width and is acceptable to LADOT if satisfactory arrangements are made to relocate the yellow and white curb zones on the south side of Beverly Boulevard adjacent to the Beverly Center (west of La Cienega Boulevard). However, the intersection of Beverly and San Vicente Boulevards is substantially within the City of West Hollywood so this striping would require their review. On the westbound Beverly Boulevard approach to La Cienega Boulevard, an exclusive 80-foot long right-turn-only lane will be provided by reducing sidewalk width from 15 to 10 feet and is also acceptable to LADOT. No curb parking space removal will be required in West Hollywood but four spaces on the south side of Beverly Boulevard will be lost in the City of Los Angeles as a result of the mitigation.

Status: This measure has been completed and will not be required for the proposed Project

MM TRF-N/A: Robertson Boulevard between Beverly Boulevard and Burton Way: Install northbound and southbound left-turn pockets on Robertson Boulevard at its intersection with Alden Drive, Third Street and Burton Way. However, the removal of one parking space on the east side of Robertson Boulevard north of Third Street and one space south of Third Street will be required. In addition, two parking spaces in Beverly Hills on the west side of Robertson Boulevard south of Burton Way will be lost. A three-foot roadway widening of the south side of Beverly Boulevard, west of Robertson Boulevard, will provide mitigation by installing an eastbound right-turn-only lane. The implementation of the above mitigation requires improvements within the cities of West Hollywood and Beverly Hills. As a result, concurrent approval from both cities is required.

Status: This measure has been completed and will not be required for the proposed Project.

MM TRF-N/A: Third Street between Sherbourne Drive and La Cienega Boulevard: A westbound right-turn-only lane on Third Street at Sherbourne Drive will be implemented by means of a five-foot dedication, a two-foot sidewalk easement, and a 12-foot dedication and widening along the project site frontage. However this will only partially mitigate the projects significant impact even with the additional application of 25 percent TDM. At San Vicente Boulevard, eastbound Third Street will be striped to add a right-turn-only lane within the existing roadway by the installation of additional red curb. In addition, mitigation will be provided at the intersection of Third Street and La Cienega Boulevard within the existing right-of-way from Third Street to Blackburn Avenue to provide dual left-turn lanes for northbound and southbound La Cienega Boulevard. Three parking spaces on the south side of Third Street west of San Vicente Boulevard and seven parking spaces on the west side of Sherbourne Drive, north of Third Street, will be removed.

Status: This measure has been completed and will not be required for the proposed Project.

MM TRF-N/A: San Vicente Boulevard and Wilshire Boulevard: Restripe San Vicente Boulevard with an additional exclusive left-turn lane on both approaches to provide double left-turn lanes. Although these modifications fall almost entirely within the boundaries of the City of Los Angeles, the City of Beverly Hills should also review the mitigation because the intersection is partly within their jurisdiction.

Status: This measure has been completed and will not be required for the proposed Project.

MM TRF-N/A: La Cienega Boulevard and San Vicente Boulevard: Restripe eastbound San Vicente Boulevard to provide two lanes. Together with the two existing lanes

from Burton Way, this restriping will be sufficient to mitigate impacts at this intersection. South of the intersection, the four lanes would merge to three, at a point satisfactory to LADOT. Six parking spaces on the west side of San Vicente Boulevard north Burton Way would be lost during 7:00 AM to 7:00 PM, Monday through Friday.

Status: This measure has been completed and will not be required for the proposed Project.

MM TRF-N/A: Cedars-Sinai Medical Center shall guarantee (by bond, cash or irrevocable letter of credit, subject to the approval of the City of West Hollywood) the necessary funding to enable the City of West Hollywood to design and install street improvements at the following intersections/street segments located within the City of West Hollywood:

(a) San Vicente Boulevard/Melrose Avenue
(b) San Vicente Boulevard/Beverly Boulevard
(c) Robertson Boulevard/Beverly Boulevard

In the event that any improvement described above is rejected by the City of West Hollywood, or is not approved prior to or concurrently with the approval of a building permit by the City of Los Angeles, then the project shall be deemed as having satisfied the condition. If the City of West Hollywood rejects the proposed street improvements, the City of Los Angeles Department of Transportation shall propose a substitute street improvement not to exceed the cost of the originally proposed improvement.

Status: This measure has been completed and will not be required for the proposed Project.

MM TRF-N/A: Cedars Sinai Medical Center shall guarantee (by bond, cash, or irrevocable letter of credit, subject to the approval of the City of Beverly Hills) the necessary funding to enable the City of Beverly Hills to install ATSAC or Quicnet equipment at the following intersections located within the City of Beverly Hills. The cost shall not exceed the current cost of $100,000 per intersection:

(a) Robertson Boulevard/Wilshire Boulevard
(b) La Cienega Boulevard/Wilshire Boulevard

The City of Beverly Hills Department of Transportation shall determine the electronic traffic surveillance system to be utilized at these two intersections.

In the event the improvement described above is rejected by the City of Beverly Hills, or is not approved prior to or concurrently with the approval of a building permit by the City of Los Angeles, then the project shall be deemed

as having satisfied the condition. In the event the City of Beverly Hills rejects the proposed street improvements, the City of Los Angeles Department of Transportation shall propose a substitute street improvement not to exceed the cost of the originally proposed improvement.

Status: This measure has been completed and will not be required for the proposed Project.

(3) Vehicular Access

MM TRF-4: Driveway plans shall be prepared for approval by the appropriate District Office of the Bureau of Engineering and the Department of Transportation.

MM TRF-5: Access for the handicapped shall be located in accordance with the requirements of the Handicapped Access Division of the Department of Building and Safety.

MM TRF-N/A: Applicant shall covenant and agree that all current public and private streets within the Cedars-Sinai Medical Center campus shall remain open to free travel of emergency vehicles, vehicles driven by the public, and for public use.

Status: The Applicant has filed the required Covenant and Agreement with the City. As such, this measure is not required as part of the proposed Project.

MM TRF-6: Adequate access to site for police shall be provided. A diagram of the site shall be sent to the Police Department for their review, and their recommendations and requirements shall be incorporated into the final design.

MM TRF-7: Adequate access to site for fire protection service vehicles and personnel shall be provided. A diagram of the site shall be sent to the Fire Department for their review. Emergency access and exit plans shall comply with the recommendation and requirements of the Fire Department.

MM TRF-8: The applicant should provide safe pedestrian/auto junctures to the satisfaction of the Department of Transportation and the Bureau of Engineering at key intersections, driveway locations, entry points, and within parking areas of the Medical Center.

MM TRF-9: Sheltered waiting areas shall be provided by the applicant at bus stops adjacent to the perimeter of the CSMC campus where no shelter currently exists.

Status: The Applicant is currently working with the Metro on the relocation of transit stops around the CSMC Campus (See Section II: Project Description and Figure 14: Transit Plan). As part of this relocation program, new bus

stops and shelters will be provided. The relocation program and the new bus shelters are anticipated to be implemented prior to occupancy of the new Advanced Health Sciences Pavilion (beginning construction in 2009).

MM TRF-10: Applicant shall coordinate with DOT to identify sidewalks and pedestrian access points for improvement of access from transit stops.

(4) Parking

MM TRF-11: Parking/driveway plan. A parking area and driveway plan shall be prepared for approval by the appropriate District Offices of the Bureau of Engineering and the Department of Transportation.

MM TRF 12: The design of the on-site parking shall integrate safety features, such as, signs, lights, and striping pursuant to Section 12.21.A5 of the Municipal Code.

MM TRF-13: The Driveway and Parking Plan review for the project should be coordinated with the Citywide Planning Coordination Section.

MM TRF-14: Off-street parking should be provided for all construction-related employees generated by the proposed project. No employees or sub-contractors should be allowed to park on the surrounding residential streets for the duration of all construction activities.

MM TRF-15: Off-street parking shall be provided free of charge for all construction-related personnel and employees, including without limitation, independent contractors, consultants and agents, during the construction phases of the project.

(5) Public Transit

MM TRF-16: Coordinate temporary location for bus stops on Third Street and Alden Drive with SCRTD [now Metro] during project construction.

MM TRF-17: Maps of surrounding bus services should be posted at bus stops and other locations where people are likely to view the information, particularly near the Outpatient Diagnostic and Treatment Center (now known as the Advanced Health Sciences Pavilion), where over 75 percent of the daily new trips are assigned. Information shown should include the location of the closest bus stops, hours of operation, frequency of service, fares, and SCRTD [now Metro] telephone information numbers.

MM TRF-18: Sheltered waiting areas should be provided at major bus stops where no shelter currently exists.

MM TRF-19: The Medical Center shall coordinate with LADOT to identify sidewalks which should be widened within the campus to encourage pedestrian activity and improve access to transit stops.

MM TRF-20: Any planned retail sites such as pharmacies, newspaper stands, or food and beverage stands should be located adjacent to major bus stops in order to improve the convenience of using transit.

(6) Easements

MM TRF-21: Coordinate relocation of underground utility lines in the event of encroachment upon same by construction related to proposed project.

c. Recommended and Additional Mitigation Measures

The following is a list of Project-specific mitigation measures that are unique to the Project and are based upon the impacts of the proposed Project as defined in this Draft SEIR.

(1) Construction

MM TRF-22: The Project Applicant will prepare and implement an Interim Traffic Control Plan ("TCP") during construction.

MM TRF-23: Prior to obtaining a demolition and/or grading permit, the Project Applicant shall prepare a Construction Traffic Control Plan ("Construction TCP") for review and approval by the LADOT. The Construction TCP shall include the designated haul route and staging area, traffic control procedures, emergency access provisions, and construction crew parking to mitigate the traffic impact during construction. The Construction TCP will identify a designated off-site parking lot at which construction workers will be required to park.

(2) Long-Term Operational

MM TRF-24: Int. No. 2: Robertson Blvd./Alden Dr.-Gracie Allen Dr. Provide a right-turn-only lane at the northbound approach of Robertson Boulevard at the Alden Drive-Gracie Allen Drive intersection, as well as a right-turn-only lane at the westbound approach of Alden Drive-Gracie Allen Drive at the intersection. The resultant lane configurations at the northbound approach to the intersection will be one exclusive left-turn lane, one through lane and one right-turn-only lane. The resultant lane configurations at the westbound approach to the intersection will be one shared left-turn/through lane and one right-turn-only lane. These improvement measures would require restriping both the northbound and southbound approaches to the intersection; widening the westbound approach along the north side of Alden Drive-Gracie Allen Drive by 2.5 feet for a distance of approximately 100 feet (not including the

transition length back to the existing sidewalk width), thereby reducing sidewalk width from the existing 12.5 feet to 10 feet; as well as the removal of on-street parking along the eastside of Robertson Boulevard south of the intersection for a distance of approximately 130 feet (approximately 6 spaces). If implemented, the mitigation measure shall be executed in two phases. First, Alden Drive-Gracie Allen Drive shall be widened and restriped as proposed above. Second, a traffic warrant analysis shall be performed 2 years after full occupancy of the Project to determine the need for a right-turn-only lane at the northbound approach of Robertson Boulevard. If a right-turn-only lane is warranted, the lane shall be implemented as proposed above.

MM TRF-25: Int. No. 6: George Burns Rd./Beverly Blvd. Provide a right-turn-only lane at the eastbound approach of Beverly Boulevard at the George Burns Road intersection, as well as two lanes at the northbound approach of George Burns Road at the intersection. The resultant lane configurations at the eastbound approach to the intersection will be one two-way left-turn lane, two through lanes and one right-turn-only lane. The resultant lane configurations at the northbound approach to the intersection will be one shared left-turn/through lane and one right-turn-only lane. These improvement measures would require widening along the south side of Beverly Boulevard west of the intersection by approximately three feet and the removal of on-street parking for a distance of approximately 55 feet to accommodate the installation of the eastbound right-turn-only lane (approximately 4 spaces). The three-foot widening would also reduce the existing sidewalk width from 15 feet to 12 feet, which still exceeds the minimum 8 foot sidewalk for a Major Highway [30], for a distance of approximately 100 feet (not including the transition length back to the existing sidewalk width).

It must be noted that this intersection is located in the City of West Hollywood, therefore implementation of the recommended mitigation will require approval and cooperation with the City of West Hollywood.

d. Recommended Cumulative/Area-wide Mitigation

All potential cumulative impacts on transportation will be reduced to a less than significant level with incorporation of the Project mitigation measures identified above.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

The following paragraphs summarize the level of significance after the implementation of the recommended transportation mitigation measures for the subject study intersections.

[30] City of West Hollywood General Plan Section 5.0 Circulation, page 183.

- Int. No. 2: Robertson Blvd./Alden Dr.-Gracie Allen Dr.

  As indicated in *Table 26: Summary of Volume-To-Capacity Ratios and Levels of Service*, this measure is anticipated to reduce the potentially significant Project-related impact to less than significant levels. The improvement is expected to improve operations to 0.824 (LOS D) from 0.847 (LOS D) with the Project during the A.M. peak hour. The improvement is expected to improve operations to 0.918 (LOS E) from 1.010 (LOS F) with the Project during the P.M. peak hour.

While the recommended mitigation measure is feasible, it is noted that the Lead Agency (i.e., City of Los Angeles) may determine that the removal of on-street parking spaces shall not be permitted, and thus not allow implementation of the recommended mitigation measure. In this circumstance, a significant unmitigated impact would result for this intersection and a Statement of Overriding Considerations should be adopted.

The Original EIR found that development of the Master Plan Project and implementation of the mitigation measures would result in the loss of approximately 51 to 60 on-street parking spaces, a significant impact without feasible mitigation that is nonetheless acceptable compared with the benefits of the Project, as explained in the Statement of Overriding Considerations [See Original EIR Findings, Section III.D.5; see also Original EIR, Statement of Overriding Considerations, Section VII]

- Int. No. 6: George Burns Rd./Beverly Blvd.

  As indicated in *Table 26: Summary of Volume-To-Capacity Ratios and Levels of Service*, this measure is anticipated to reduce the potentially significant Project-related impact to less than significant levels. The improvement is expected to improve operations to 0.880 (LOS D) from 0.910 (LOS E) with the Project during the P.M. peak hour.

While the recommended mitigation measure is feasible, it is noted that this intersection is located within the City of West Hollywood and thus implementation of the recommended mitigation is beyond the control of the Lead Agency (i.e., City of Los Angeles). Should the City of West Hollywood not allow the implementation of this recommended mitigation measure, a significant unmitigated impact would result for this intersection and a Statement of Overriding Considerations should be adopted.

The Original EIR found that, with the effective implementation of the mitigation measures, significant Project-related traffic effects would be eliminated at all intersections at Master Plan build-out during the A.M. and P.M. peak hours. [See Original EIR Findings, Section III.B.11]

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.

V. ALTERNATIVES

A. OVERVIEW OF ALTERNATIVES ANALYSIS

1. GUIDANCE AND SETTING FOR ANALYSIS

a. Regulatory Requirements for Identifying and Analyzing Project Alternatives

The identification and analysis of alternatives is a fundamental concept of the environmental review process under CEQA. CEQA Guidelines Section 15126.6 addresses the required discussion of alternatives to proposed projects in an EIR and the intended use of such information. Section 15126.6(a) states:

> An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible.

The CEQA Guidelines further clarify in Section 15126.6(b):

> Because the EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

Thus, an EIR for any project that is subject to CEQA review must consider a reasonable range of alternatives to the project which: 1) substantially lessen the project's significant environmental impacts; and 2) that are feasible and may substantially accomplish the proposed project goals.

The CEQA Guidelines Section 15126.6(f)(1) provides additional factors that may be taken into account when addressing the feasibility of alternatives. These factors include:

> [S]ite suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries. . .and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site. . .

The range of alternatives required within an EIR is governed by the "rule of reason." Specifically, CEQA Guidelines Section 15126.6(c) provides that:

> The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the Lead Agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the Lead Agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The CEQA Guidelines also require the analysis of a "No Project" alternative in addition to any other feasible alternatives identified. CEQA Guidelines Section 15126.6(e). The "No Project" alternative discusses the existing conditions at the time the Notice of Preparation ("NOP") is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved. CEQA Guidelines Section 15126.6(e)(2).

The impact analysis, as detailed in *Section IV: Environmental Impact Analysis* of this Draft SEIR, concludes that the proposed Project will not cause significant unavoidable impacts after the implementation of the standard conditions and requirements, project design features, previously adopted mitigation measures and recommended new mitigation measures, with the exception of significant (temporary) air quality and noise impacts during the construction phase of the Project.

The Applicant requests approval of a Zone Change and Height District Change to revise the conditions of the current [T][Q]C2-2D-O zoning designation and an amendment to the existing Master Plan and Development Agreement to permit an additional 100 new inpatient beds and ancillary medical services (equivalent of 200,000 square feet of floor area), and parking on the CSMC Campus. This 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. The objectives of the Project are stated as follows:

- To continue to provide high quality medical services and advanced research capabilities at the CSMC Campus;
- To accomplish better utilization of limited CSMC Campus space;
- To provide an additional 100 inpatient beds in the Southern California region, which has been consistently losing beds and other inpatient medical services over the last decade;
- To provide a public benefit and fulfill a healthcare need for the community and region;
- To facilitate a balanced distribution of healthcare, emergency room and trauma services throughout the Los Angeles region;

- To support improved medical technologies that will enhance CSMC's ability to provide high quality medical care to the community;

- To provide needed inpatient diagnostic and treatment facilities, research facilities, medical suites, and administrative space to support customer and community demand for these services;

- To remain committed to fulfilling the intent of the Master Plan and demonstrating consistency with the City of Los Angeles comprehensive planning programs;

- To provide development that is thoughtfully designed, that reflects a refined cohesive image of the CSMC Campus as an integrated complex of buildings and functions, and that balances with the surrounding community;

- To provide adequate and convenient parking for each CSMC Campus component, including the Project; and

- To provide improvements to the pedestrian and vehicular circulation patterns within the CSMC Campus that will maintain and improve accessibility, safety, efficiency and convenience for patients, visitors, and staff.

b. Alternatives Analysis Format and Methodology

CEQA Guidelines Section 15126.6(d) provides that the degree of analysis required for each alternative need not be exhaustive, but rather should be at a level of detail that is reasonably feasible and shall include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." Under CEQA Guidelines Section 15151, the EIR must contain "a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences." Hence, the analysis of environmental effects of the Project alternatives need not be as thorough or detailed as the analysis of the Project itself.

The level of analysis in the following sections is sufficient to determine whether the overall environmental impacts would be less, similar or greater than the corresponding impacts of the proposed Project. In addition, each alternative is evaluated to determine whether the Project objectives, identified above and in *Section II: Project Description*, would be substantially attained by the alternative.

It should be noted that since the proposed Project consists of an amendment to the Master Plan to include a net additional 100 inpatient beds (equivalent to 200,000 square feet of floor area for medical uses) on the CSMC Campus, each alternative will analyze the net incremental impacts of the Project alternative beyond those determined in the Original EIR for build-out of the Master Plan, as well as changes to the new West Tower to be constructed at the Project Site. Similarly, as implemented throughout this Draft SEIR, the level of significance determination for

each alternative will be based on the net incremental impact for each environmental issue beyond the impacts determined in the Original EIR for build-out of the Master Plan.

The evaluation of each alternative also considers the anticipated net environmental impacts after implementation of feasible mitigation measures. The net impacts of the alternatives for each environmental issue area are classified as either having no impact, a less than significant impact or a significant and unavoidable impact. These impacts are then compared to the corresponding impact for the Project in each environmental issue area. To facilitate the comparison, the analysis identifies whether the net incremental impact would clearly be less, similar, or greater than that identified for the Project. Finally, the evaluation provides a comparative analysis of the alternative and its ability to attain the basic Project objectives.

2. ALTERNATIVES SELECTION

a. Potential Project Alternatives Considered but Rejected

(1) Alternative Sites

Section 15126.6(a) of the CEQA Guidelines suggests that an alternate location should be included in the range of reasonable alternatives to a project evaluated in an EIR, when feasible. However, in this case there is no feasible alternative site that could reasonably fulfill the basic objectives of the Project.

The Original EIR identified outstanding unmitigatable impacts related to operational phase (long-term) air quality (due to mobile emissions and toxic air contaminants), operational phase (long-term) fire protection and police services, operational phase (long-term) water supply and sewer services, and operational phase (long-term) solid and hazardous waste disposal. The selection of alternatives for the Project focused primarily on reducing overall construction (short-term) impacts, with particular focus on air quality and noise, as well as reducing operational (long-term) traffic impacts to less than significant levels without required mitigation implementation, as currently required under the proposed Project. The General Plan, Community Plan and zoning designations applicable to the Project Site were key considerations and established limitations on reasonable alternative land uses. The achievement of Project objectives was also emphasized in designing and selecting alternatives.

The Original EIR evaluated a range of alternative sites to accommodate the entire 700,000 square-foot Master Plan development. Due to the nature of the services provided under the Master Plan, it was assumed that the proposed facilities would need to be associated with existing hospitals and that relocation on vacant land not associated with an existing hospital was infeasible. The two most suitable locations within a 5-mile service area of the CSMC Campus with available land for development, included: the University of California at Los Angeles Medical Center and the Midway Hospital (now known as Olympia Medical Center). The Original EIR concluded that neither of these alternative sites resulted in the potential to significantly reduce the Master Plan project impacts, including significant impacts to short-term (construction phase) air quality and noise, and long-term (operational) traffic, while still attaining the Master Plan objectives. There is no appreciable change in the conclusions about those

alternative sites with regard to the current Project, and it is unrealistic to expect that these location options would help further the objectives of the Project.

An alternative site within the CSMC Campus boundary is another potential option. However, due to the nature of the inpatient uses associated with the proposed Project and the building square footage required for those uses, relocation within the CSMC Campus would require full or partial demolition of an existing facility or parking structure. Options for demolition would include the Thalians Building, the North Patient Tower, the South Patient Tower, Parking Structure No. 8 or the planned Advanced Health Sciences Pavilion (beginning construction in the first quarter of 2009). As these facilities provide a number of important services for CSMC that are not present within the Existing Building at the Project Site, there would be a substantial adverse impact to the operation of CSMC. Further, relocation at these CSMC Campus alternative sites would not result in the potential to significantly reduce short-term (construction phase) air quality and noise and long-term (operational) traffic, while still attaining the Project objectives.

A more reasonable alternative site may be found at the location of another nearby off-site CSMC facility. In this case, the uses proposed for the Project would be incorporated into existing CSMC structures. One such option is the Mark Goodson Building ("the Goodson Building"), located several blocks to the south at 444 S. San Vicente Boulevard, between Colgate and Drexel Streets.

The Goodson Building, built in 1982 and comprised of approximately 101,300 square feet, is managed by CSMC and houses several state-of-the-art specialty facilities including the Institute for Spinal Disorders, the Orthopaedic Center and the Gamma Knife Center. However, the Goodson Building only contains approximately 50% of the 200,000 square feet needed for the proposed Project. Accommodating the Project (i.e., an increase of 100 inpatient beds to be contained within 200,000 square feet) at the Goodson Building location would require a reduction in size of the Project by approximately 100,000 square feet in order to fit the 100 inpatient beds within the existing available building space. Presumably, the remainder of the medical uses associated with the Project (i.e., the 170,650 remaining entitlement from the Master Plan) would be accommodated as infill in another location within the CSMC Campus and the 90,000 square-foot Existing Building would remain as-is.

The establishment of the Project's medical uses at this alternative site would also require the relocation of the Goodson Building's currently existing state-of-the-art specialty facilities. Given limitations on the availability of adequate modern medical office facilities in the Project area, relocation of the 100 new inpatient beds to the Goodson Building would require the relocation of these specialty facilities to an area further away from the CSMC Campus. If the approximately 101,300 square feet of specialty medical uses currently in the Goodson Building were relocated outside of the Project area and the Project were reduced by approximately 100,000 square feet to fit within the building area of the Goodson Building, the result would be an approximate 200,000 square-foot net loss of medical uses within property operated, leased and/or managed by CSMC. This loss of square feet is contrary to the Project's objectives of providing expanded medical services within a more efficiently-designed and consolidated campus, and to retaining state-of-the-art medical facility components that advance medical technology and range of services at the CSMC Campus. Furthermore, the Goodson Building is currently not approved by the Office of Statewide Health Planning and Development ("OSHPD"). With implementation of inpatient

uses, the building would need to be retrofitted to comply with seismic resistance regulations of Senate Bill 1953,[1] as well as other applicable OSHPD requirements.

Another option in lieu of reducing the Project by 50% to fit within the existing Goodson Building and relocating the specialty services currently in the facility is to demolish the Goodson Building and construct an approximately 301,300 square-foot building with associated parking on the site. This new building would incorporate the 200,000 square feet of inpatient uses of the Project and the 101,300 square feet of specialty medical uses already existing in the building. However, since this site is located outside of the CSMC Campus in a residential area, the associated impacts of the new building at this site are anticipated to be greater than those associated with construction at the current Project Site. This option at the Goodson Building site would not fulfill the Project objectives to provide high quality medical services at the CSMC Campus or provide development that reflects a refined cohesive image of the CSMC Campus as an integrated complex of buildings and functions.

Additionally, implementation of the Project's new inpatient services on other off-site property owned by CSMC would require the creation of new administration space and/or duplicate lab space, diagnostic space, admitting space and food service space at that off-site property. Thus, the Goodson Building alternative may involve an expansion of medical uses beyond the defined Beverly Center-Cedars Sinai Regional Commercial Center area and, therefore, would be in conflict with Objective 2-2 of Goal No. 2 of the Community Plan, which promotes distinctive commercial districts and pedestrian-oriented areas. By locating these inpatient services outside of the CSMC Campus and the boundaries of the Regional Commercial Center, CSMC inpatient uses would be fragmented and would require transportation between the Campus and these off-site inpatient uses via additional CSMC shuttle buses for patients and staff, thus conflicting with the creation of a distinctive commercial district centered around the CSMC Campus and the Beverly Center, and the promotion of a pedestrian-oriented area.

The Goodson Building site offers no appreciable benefit in reducing environmental impacts, is in conflict with the Project objectives, and is not consistent with the Community Plan. Other potential alternative sites within the CSMC Campus offer no appreciable difference from the proposed Project (which is also located within the Campus). Therefore, given the conclusion regarding alternative sites in the Original EIR and the above conclusion regarding the Goodson Building site, development of the Project in an alternative site location is considered infeasible and is not analyzed further in this Draft SEIR.

(2) Alternative Land Uses

As an alternative to the Project, a development could include a mix of land uses other than, or in addition to, typical medical center facilities. The Project Site is currently developed with medical uses and is zoned [T][Q] C2-2D-O. The Property is designated Regional Commercial by the Community Plan, which permits a range of commercial (CR, C2 and C4) and mixed-use

[1] Senate Bill 1953 or SB 1953, The Hospital Facilities Seismic Safety Act, requires all general acute-care inpatient buildings in the state to be seismically retrofitted by 2030 to be able to maintain operations following a major earthquake.

zones (RAS3 and RAS4). More specifically, the Community Plan identifies the Project area as the Beverly Center-Cedars Sinai Regional Commercial Center.

Given the existing uses, a reasonable alternative could include the addition of office, hotel or residential uses that would complement the existing medical center. However, the Original EIR evaluated a range of alternate uses, including office, hotel and retail center, and concluded that none of these options resulted in the potential to significantly reduce the Master Plan impacts while still attaining the Master Plan objectives. With regards to the Project, a reduced version of each of those options could be considered as an alternative use at the Project Site. However, there would be no appreciable change in the conclusions about these uses, and these alternative uses would not further the objectives of the Project. For the reasons noted above, a departure from medical uses and the development of an alternative land use project is considered infeasible and not analyzed further in this Draft SEIR.

Nonetheless, alternative medical center uses may be both reasonable and feasible. For example, the proposed 200,000 square feet could contain outpatient services instead of 100 new inpatient bed uses. This type of change-in-use alternative is evaluated as a feasible option and is discussed below.

b. Project Alternatives Selected for Evaluation

The selection of alternatives for the Project focused primarily on reducing overall short-term construction impacts, with particular focus on air quality and noise, which were found to be significant and unavoidable under the proposed Project, as well as reducing long-term operational traffic impacts to less than significant levels without implementation of the mitigation measures that are required under the proposed Project. Three alternatives (including the "No Project" alternative) are evaluated in this Draft SEIR that would avoid or substantially lessen some or all of the Project's significant impacts. Since alternatives involving an alternate site have been rejected, and one of the objectives of the Project is to implement the previously approved and vested Master Plan, the range of alternatives considered for evaluation are focused on different site-specific, medical-use options. Alternatives selected for evaluation include the following:

- Alternative A: No Project – Build-out of Master Plan
- Alternative B: Reduced Project – Net Increase of 150,000 SF
- Alternative C: Change in Use Project – Outpatient Uses

These three alternatives are described below and summarized in *Table 35: Summary of Alternatives*. The following sections provide an analysis of each alternative, including an assessment of the anticipated development impacts, as shown in *Table 36: Summary of Alternative Net Incremental Impacts*; a comparison of each alternative's impacts relative to the Project, as shown in *Table 37: Alternatives Comparison to the Project*; and a determination of each alternative's ability to meet the Project objectives.

TABLE 35
SUMMARY OF ALTERNATIVES

PROJECT DESCRIPTION COMPONENT	PROPOSED PROJECT	ALT A NO PROJECT	ALT B REDUCED PROJECT	ALT C CHANGE IN USE PROJECT
Alternative Title	West Tower Project	Master Plan Build-out	150,000 SF (75 inpatient beds)	200,000 SF Outpatient Services
Overview	Amend Master Plan to add 200K sf of inpatient space and 100 inpatient beds on CSMC Campus	No additional floor area beyond build-out of Master Plan	Reduce floor area for inpatient services by 25%	Maintain floor area, but convert inpatient services to outpatient services
Total Floor Area of Construction at Project Site	460,650 SF	170,650 SF	410,650 SF	460,650 SF
Total Associated Parking Provided at Project Site	700 space structure	650-700 space structure	625-700 space structure	>700 space structure
Total "Net" New Floor Area Above Master Plan	200,000 SF	0 SF	150,000 SF	200,000 SF
Total "Net" New Project Parking Required	250 spaces	0 spaces	188 spaces	1000 spaces
Proposed Uses (SF)	30,000 Research 312,750 Inpatient[1] 117,900 Outpatient[2] (100 Inpatient Beds)	0 Research[3] 82,750 Inpatient 87,900 Outpatient (52 Inpatient Beds)[4]	30,000 SF Research 262,750 Inpatient 117,900 Outpatient (75 Inpatient Beds)	30,000 SF Research 112,750 Inpatient 317,900 Outpatient (0 Inpatient Beds)
Building Stories / Height	11 stories/ 185 feet	10 stories/ 175 feet	10 stories/ 175 feet	11 stories/ 185 feet

[1] "Inpatient" uses include Administrative, Rehabilitation, Diagnostic/ER and Support space.
[2] Outpatient uses include Medical Suites.
[3] The "No Project" Alternative would only include full build-out of the remaining 170,650 sf of the Master Plan without incorporation of the 90,000 sf Existing Building uses into the new facility.
[4] Remaining number of inpatient beds allowed for the 170,650 sf of residual Master Plan development, as analyzed in the Original EIR.

B. ALTERNATIVE A: NO PROJECT – BUILD-OUT OF MASTER PLAN

1. ALTERNATIVE DESCRIPTION

The Original EIR evaluated a "No Project" alternative under which the Master Plan would not have been implemented, essentially representing a "no new development" scenario. Although the "No Project" alternative evaluated in the Original EIR was determined to be environmentally superior to the Master Plan project, it would not have provided for attainment of the Master Plan project objectives. In 1993, the Master Plan was approved and has been partially implemented on the CSMC Campus.

For the current Project, the "No Project" Alternative assumes that the entire 700,000 square feet of the approved Master Plan plus approved parking would be developed, but that no additional medical center uses beyond the 700,000 square feet evaluated in the Original EIR would occur.

Under this No Project Alternative, the Existing Building would not be demolished and up to 170,650 square feet of remaining entitled uses would be constructed on a building footprint limited to the Existing Parking Lot located at the Project Site. On the Project Site, the new construction scale and design would be essentially equivalent to that described for the "Site 2" Rehabilitation Center (the "Rehab Center") in the Master Plan, which consisted of a 10-story, 175-foot high building with a four-level, subterranean 650-space parking structure underneath. Additionally, the new building could contain a total of 52 inpatient beds, which represents the remaining entitlement for inpatient beds associated with development of the Rehab Center[2] and the remainder of the Master Plan. Under the No Project Alternative, the resultant physical and operational conditions described in the Original EIR for the approved Master Plan are anticipated. This Alternative satisfies a direct requirement in CEQA Guidelines Section 15126.6(e) for a "No Project" alternative comparison.

2. ENVIRONMENTAL IMPACTS OF ALTERNATIVE

a. Aesthetics

Under the No Project Alternative scenario, development of the 170,650 square feet of remaining entitlement under the Master Plan within a new building at the Project Site would result in no visual change beyond that determined in the Original EIR.

(1) Visual Character

A future building at the Project Site would change the visual character from the Existing Parking Lot to a 10-story structure. The design of the building would be architecturally consistent with the existing buildings on the CSMC Campus and would appear similar in massing, size and

[2] After construction of the Advanced Health Sciences Pavilion, approximately 33,000 square feet or 26% of the 127,500 square foot Rehab Center approved under the Master Plan will remain for development at the Project Site to be incorporated into the new 170,650 square foot facility. The potential 52 inpatient beds to be included in the new facility thus represents the remaining approximately 26% of the 200 inpatient beds approved for the Rehab Center under the Master Plan and analyzed in the Original EIR.

height to that conceptualized for the proposed Project. As the Existing Building at the Project Site would not be demolished under the No Project scenario, there would be lesser aesthetic construction-related impacts at the Project Site and any landscaping associated with the Existing Building would be retained. However, similar to the Rehab Center described in the Master Plan, the new building would stack the parking structure underneath the proposed uses of the facility, utilizing the ground floor of the new facility as a parking garage entrance. Under the proposed Project, the parking garage would be a separate, adjoining structure behind the West Tower, thus allowing a more pedestrian-oriented utilization of the West Tower ground floor as a lobby with large windows. Therefore, the No Project Alternative may result in a street level entrance that is not consistent with the goals of the Community Plan to orient building street frontages to pedestrians through utilization of windows or visually interesting design elements at street level.

Despite minor differences between the new buildings to be constructed under the proposed Project and the No Project Alternative, both would have similar impacts to visual character due to the similar construction characteristics and similar massing and height of the buildings, as well as the similar architecture planned under both scenarios. In both cases, the urban visual character of the Project Site, the CSMC Campus and the Project area would not be significantly impacted. Both the No Project Alternative and the proposed Project would result in a less than significant impact to visual character during both the construction and operational phases. Further, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project beyond the impacts determined in the Original EIR for build-out of the Master Plan, both the No Project Alternative and the proposed Project would result in less than significant visual character impacts, as both would be incorporated into new buildings that are similar in height and massing. Therefore, the impacts associated with the No Project Alternative would be similar and comparable to those of the proposed Project.

(2) Alteration of Views

Under the No Project Alternative, a new building at the Project Site would result in a change of views similar to those anticipated for the Master Plan Rehab Center described in the Original EIR. The visual analysis for the proposed Project, included in *Section IV.A: Aesthetics*, indicates that due to the urban nature and building heights existing in the Project area and on the CSMC Campus, views would not be greatly affected by the proposed Project and would not result in a significant impact. Both the proposed Project and the No Project Alternative would result in a less than significant impact on views in the area during the construction and operational phases. Further, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project beyond the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in a less than significant impact to viewsheds, which is similar and comparable to the proposed Project due to the similar height and massing of the new buildings under both scenarios.

(3) Lighting and Glare

A new building at the Project Site would be subject to the Los Angeles Building Code and Municipal Code requirements regarding lighting and glare. Nighttime illumination from security lighting and interior lighting is expected under the No Project scenario, but similar to the

proposed Project, these impacts can be mitigated through window tinting, shielding and other regulatory requirements. Glare from windows and reflective surfaces may also be mitigated through Code and regulatory requirements. Both the proposed Project and the No Project Alternative would take similar steps to mitigate impacts from lighting and glare to less than significant levels. Further, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project beyond the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in a less than significant incremental impact to lighting and glare, which is similar and comparable to the proposed Project due to the similar height, massing and window coverage of the new buildings under both scenarios.

b. Air Quality[3]

(1) Construction Phase

Construction activity assumptions for the proposed Project and the No Project Alternative were based on the size of the Project Site and the type of development being proposed. As such, similar general construction assumptions were made for both scenarios, including seven pieces of construction equipment operating simultaneously for eight hours during each day of construction, a maximum of two acres per day graded and/or excavated, the generation of 100 delivery/haul truck trips per day, 100 workers per day, and the application of architectural coating over a six-month time period. Construction emissions are primarily based on the type and amount of equipment required on a peak daily basis at the Project Site.

Unlike the proposed Project, the No Project Alternative would only anticipate the demolition of the Existing Parking Lot, not the Existing Building. Furthermore, the No Project Alternative, under the Master Plan, included excavation activities for four subterranean parking levels at the Project Site; whereas, the proposed Project contains three levels of subterranean parking. While the No Project Alternative would reduce demolition and increase excavation activities at the Project Site, construction activity assumptions (i.e., daily number of pieces of construction equipment, workers, haul trucks, maximum grading per day, etc.) would continue to be similar under both scenarios, as both new buildings are similar in massing and height and would require the same types and amount of equipment during the construction process on a daily basis. The primary difference in construction emissions resulting from both scenarios would result from a reduced construction time span (i.e., number of days) for the No Project Alternative. However, this construction time difference would neither be substantial nor discernable with regards to a determination in levels of significance. As such, daily regional and localized construction emissions associated with the No Project Alternative would be slightly reduced due to less construction time (number of days) needed for development, but are considered substantially similar to the proposed Project. Therefore, as determined for the proposed Project, the daily construction emissions for the No Project Alternative would be significant and unavoidable for NO_X emissions (regional) and $PM_{2.5}$ and PM_{10} emissions (localized).

[3] Air quality analyses for Alternatives A, B and C were generated by Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., August 7, 2008.

As with the proposed Project, the No Project Alternative would comply with SCAQMD Rule 403 as well as the mitigation measures that were adopted in connection with the approval of the Master Plan. The construction mitigation measures recommended for the proposed Project (see *Section IV.B: Air Quality* of this Draft SEIR) would also apply to the No Project Alternative. As noted above, like the proposed Project, construction of the new Rehab Building at the Project Site would result in a significant and unavoidable regional NO_X impact and localized $PM_{2.5}$ and PM_{10} impacts after implementation of mitigation measures. Further, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project beyond the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in an incrementally less impact to construction emissions. This is due to the fact that the Original EIR anticipated completion of build-out for the Master Plan by 2005. Since construction of the remaining entitlement would start after this date, additional emission regulations will incrementally reduce emissions from vehicles and construction equipment from those anticipated in the Original EIR.

The No Project Alternative would not involve demolition of the Existing Building at the Project Site, which was built in 1947 and has the potential to contain asbestos-containing materials ("ACMs") and lead-based paint. As such, there would be no release of ACMs and lead-based paint into the atmosphere. Thus, as with the proposed Project, the new building proposed under the No Project Alternative would result in a less than significant impact associated with carcinogenic air toxics. However, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project beyond the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in no incremental impact associated with carcinogenic air toxics, which is less than the proposed Project. This is due to the fact that both the Original EIR and the No Project Alternative will not involve demolition of the Existing Building.

Finally, as with the proposed Project, potential sources that may emit odors during construction of the No Project Alternative would include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the Project Site. Similar to the proposed Project, the No Project Alternative would utilize typical construction techniques, and the odors would be temporary and typical of most construction sites. In addition, the No Project Alternative would be required to comply with regulations contained in SCAQMD Rule 402. Thus, as with the proposed Project, the construction odor impacts from the No Project Alternative would be less than significant. Further, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project beyond the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in no incremental impact associated with construction odors, which is similar and comparable to the proposed Project. Because the No Project Alternative and the proposed Project would require the same types and amount of equipment during the construction process on a daily basis as determined in the Original EIR, there would be comparable and similar impacts.

(2) Operational Phase

Regional operational emissions from area and mobile sources associated with the No Project Alternative would not exceed SCAQMD significance thresholds. Since the regional operational

emissions for the Project would be less than significant, the regional operational emissions for the 170,650 square-foot No Project Alternative, which is smaller than the 200,000 square-foot proposed Project, would be less than the proposed Project and also less than significant. Even so, and like the proposed Project, the No Project Alternative would be required to comply with the mitigation measures adopted in connection with the approval of the Master Plan, which includes implementing a Transportation Demand Management program for the CSMC Campus. Therefore, as with the proposed Project, the No Project Alternative would result in a less than significant operational emissions impact. Further, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project over the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in no incremental impact associated with operational emissions, which is less than the proposed Project.

In the build-out year of 2023, CO concentrations associated with the No Project Alternative would result in a one-hour concentration of 2 ppm and an eight-hour concentration in a range between 1.2 ppm and 1.7 ppm.[4] As with the proposed Project, the one- and eight-hour CO concentrations would not exceed the State standards and would result in a less than significant CO concentrations impact. However, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project over the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in no incremental impact associated with CO concentrations, which is less than the proposed Project.

Like the Project, the No Project Alternative would not include any substantial potential sources of acutely and chronically hazardous toxic air contaminants ("TACs"). The Project may increase the amount of medical waste incinerated on the CSMC Campus. The Original EIR, which included mitigation measures to reduce reliance on hazardous materials, discussed regulations and impacts associated with medical waste incineration (e.g., dioxin emissions). However, CSMC has replaced the incinerator with two steam sterilizers. The steam sterilizers dispose of medical waste without generating dioxin emissions.[5] Thus, any increase in the amount of medical waste on the CSMC Campus resulting from the Project would not produce dioxin emissions. Therefore, both the No Project Alternative and the proposed Project would not release substantial amounts of TACs and would result in less than significant impacts on human health. Further, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project over the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in less than significant incremental impact associated with TACs, which is similar and comparable to the proposed Project.

The No Project Alternative would develop the Project Site with hospital-related uses, which are not land uses that are typically associated with odor complaints, such as agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. Similar to the proposed Project, on-site trash receptacles would have the potential to create adverse odors; however, as trash receptacles would be located

[4] Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., August 7, 2008.
[5] Health Care Without Harm, *Toolkit 7, Alternatives to Medical Waste Incineration: Stopping the Toxic Threat*, 2002.

and maintained in a manner that promotes odor control, no adverse odor impacts would result. Like the Project, odors associated with food preparation in a kitchen are not anticipated to be substantial under the No Project Alternative and would be controlled by the ventilation system of the new building to be constructed. Additionally, both the No Project Alternative and the proposed Project would be required to comply with SCAQMD Rule 402 and thus both would result in a less than significant impact associated with operational odors. However, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project over the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in a less than significant incremental impact associated with operational odors, which is similar and comparable to the proposed Project.

Like the Project, the No Project Alternative would not increase population or housing in the Los Angeles subregion since this alternative does not include a residential component. The new building proposed under the Master Plan for the No Project Alternative is expected to incrementally increase employment by approximately 238 persons[6], which is less than half for the proposed Project. This increase would represent less than one percent of the 278,264 new employment growth projected by SCAG between 2007 and 2023 for the Los Angeles subregion.[7] As with the proposed Project, operations of the No Project Alternative would not exceed the Southern California Association of Governments ("SCAG") growth forecasts and would be considered to be consistent with growth assumptions included in the Air Quality Management Plan ("AQMP").[8] Therefore, neither the No Project Alternative nor the proposed Project would cause or contribute to new air quality violations and both would be consistent with the AQMP, resulting in less than significant impacts. Further, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project over the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in a less than significant incremental impact associated with AQMP consistency, which is similar and comparable to the proposed Project.

Finally, the No Project Alternative would not embody features that are not typical of an urban environment or generate a disproportionate amount of vehicle miles traveled. This alternative would not have unique or disproportionately high fuel consumption characteristics and would be located in an urban area that is already planned for medical uses. Further, the No Project Alternative would be required to comply with any applicable mitigation measures adopted in connection with the approval of the Master Plan and all Assembly Bill ("AB") 32 related regulations, as well as those mitigation measures recommended for the proposed Project (see *Section IV.B: Air Quality*). As such, like the proposed Project, the No Project Alternative would have a negligible and less than significant impact on any increase in regional and national greenhouse gas ("GHG") emissions. However, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project over the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in no incremental impact associated with global climate change, which is similar and comparable to the proposed Project.

[6] Southern California Association of Governments, *Employment Density Study Summary Report*, October 31, 2001.
[7] Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., August 7, 2008.
[8] *Ibid.*

c. Noise[9]

(1) Construction Phase

Construction of the No Project Alternative would involve similar types of grading/excavation and building construction activities as the proposed Project. As such, construction noise levels associated with the No Project Alternative would be similar to the proposed Project. As with the proposed Project, construction-related noise levels would exceed the 5–dBA significance threshold at various sensitive receptors, resulting in a significant noise impact.[10] With consideration of the nearest Related Project, both the Project and the No Project Alternative would result in a significant cumulative noise impact as well. Similarly, should pile driving be required for this alternative, vibration levels would have the potential to exceed the significance threshold of 0.5 inches per second peak particle velocity ("PPV").[11] With implementation of proper mitigation measures (see *Section IV.C: Noise*), including those that were adopted in connection with the approval of the Master Plan and certification of the Original EIR, the No Project Alternative would be reduced to a less than significant short-term vibration impact; however, even with mitigation measures, both scenarios would result in a temporary significant and unavoidable construction noise impact (including cumulatively). Further, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project over the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in no incremental impact associated with construction noise and vibration, which is less than the proposed Project.

(2) Operational Phase

Noise from the operation of existing uses is generated primarily by vehicular traffic coming to and from the Project Site. These levels would increase with any intensification of uses at the Project Site. The No Project Alternative would generate a total of approximately 5,324 daily vehicle trips associated with full build-out of the 170,650 square feet of remaining entitlement in the Master Plan, which is lower than the daily trips generated by the West Tower at the Project site.[12] Noise levels for the No Project Alternative would range from 66.5 to 74.6 dBA Community Noise Equivalent Level ("CNEL"), which would be lower than noise levels associated with the proposed Project.[13] Therefore, the vehicular noise impacts from both the No Project Alternative and the proposed Project would be less than significant. However, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project over the impacts determined in the Original EIR for build-out of the Master

[9] Noise analyses for Alternatives A, B and C were generated by Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., August 7, 2008.
[10] Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., August 7, 2008.
[11] *Ibid.*
[12] Linscott, Law and Greenspan Engineers, *Traffic Impact Study, Cedars-Sinai Medical Center Project*, June 23, 2008.
[13] Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., August 7, 2008.

Plan, the No Project Alternative would result in no incremental impact associated with operational vehicular noise, which is less than the proposed Project.

As with the proposed Project, the No Project Alternative would also generate noise levels from mechanical equipment. However, the No Project Alternative would be required to implement the mitigation measures recommended for the proposed Project and those that were adopted in connection with the approval of the Master Plan and certification of the Original EIR (i.e., the installation of sound attenuating devices on exhaust fans, enclosing mechanical equipment and providing sound absorbing and shielding provisions into the design of these equipment). Similar to the proposed Project, the mitigation measures would ensure that the mechanical equipment would not incrementally increase ambient noise levels by 5 dBA or more, thus resulting in a less than significant impact for both scenarios.[14] Further, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project over the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in no incremental impact associated with stationary noise, which is similar and comparable to the proposed Project.

The No Project Alternative would develop a similar sized parking structure on the Project Site to the proposed Project; however, the multi-level parking structure would occupy the subterranean and bottom floors of the new building, as opposed to the adjacent and adjoining parking structure planned under the proposed Project. Regardless of the configuration of the parking structure, as with the proposed Project, there would be an increase in the noise level at the adjacent medical office building to the south by 0.1 dBA over the existing noise level to 65.9 dBA.[15] Other medical buildings on the CSMC Campus are located farther away from the Project Site; thus, noise levels generated by the parking structure would be decreased at these buildings. As the parking structure activity would not incrementally increase ambient noise levels by 5 dBA or more, parking noise under both the No Project Alternative and the proposed Project would result in a less than significant impact. However, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project over the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in a less than significant incremental impact associated with parking noise, which is less than the proposed Project.

Finally, neither the No Project Alternative nor the proposed Project would include significant stationary sources of operational ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the Project vicinity would be generated by vehicles and delivery trucks on the local roadways and would not be perceptible by sensitive receptors. Thus, operational vibration for both the No Project Alternative and the proposed Project would result in a less than significant impact. Further, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project over the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in a less than significant incremental impact associated with operational phase vibration, which is similar and comparable to the proposed Project.

[14] *Ibid.*
[15] *Ibid.*

d. Transportation and Circulation

(1) Traffic and LOS[16]

Under the No Project Alternative, a net increase of 365 vehicle trips during the weekday A.M. peak hour and 488 vehicle trips during the weekday P.M. peak hour are anticipated under the Future With Project Conditions (Build-out Year of 2023) for a total of 5,324 daily vehicle trips[17]. Unlike the proposed Project, which will be contained within the West Tower, constructed at the Project Site, the No Project Alternative building would only include the remaining entitlement under the Master Plan. Thus, the anticipated daily vehicle trips associated with the No Project Alternative will be less than the proposed Project. The impacts determined in the Original EIR for build-out of the Master Plan would apply to this scenario and the adopted mitigation measures would carry forward. Applicable mitigation measures recommended for the proposed Project would also apply. Therefore, with implementation of the mitigation measures approved in connection with the Master Plan (many of which have already been implemented at intersections in the Project area) and those associated with the Project, the No Project Alternative would be consistent with the Original EIR findings of impact. However, in comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project over the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in no incremental impact associated with traffic and levels of service, which is less than the proposed Project.

(2) Access and Transit

Under the No Project Alternative, improvements to internal CSMC Campus circulation, pedestrian safety and access enhancements would be implemented in a manner consistent with the proposed Project and the Master Plan. The changes in driveway and pedestrian access points at the Project Site would be similar under both scenarios. As the proposed Project would generate more employees and would service more patients than the No Project Alternative, this alternative would result in impacts to public transit that are less than the proposed Project. The proposed Project would result in the addition of less than one Project-related transit rider per bus in the Project area during the A.M. and P.M. peak hours;[18] therefore, the No Project Alternative is reasonably anticipated to result in the addition of less than one Project-related transit rider per bus during the A.M. and P.M. peak hours. Thus, both the No Project Alternative and the proposed Project would result in a less than significant Project access and public transit impact. Overall, the No Project Alternative impacts to access and transit would be less than the proposed Project impacts. In comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project over the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would result in no incremental impact associated with access or transit, which is less than the proposed Project impact.

[16] Analysis based on findings from Linscott, Law and Greenspan Engineers, *Traffic Impact Study, Cedars-Sinai Medical Center Project*, June 23, 2008.
[17] See Related Project No. LA39B of Table 7-2, Related Projects Trip Generation of *Appendix E: Traffic Impact Study* in this Draft SEIR.
[18] Linscott, Law and Greenspan Engineers, *Traffic Impact Study, Cedars-Sinai Medical Center Project*, June 23, 2008.

(3) Parking

Similar to the 700-space parking structure of the proposed Project, the No Project Alternative would include the construction of a 650-space parking structure at the Project Site, requiring the demolition of the Existing Parking Lot that contains 217 parking spaces. With implementation of the No Project Alternative, the City of Los Angeles parking requirement for the CSMC Campus would be the amount of parking required under the Master Plan as analyzed in the Original EIR, which is a total of 7,053 parking spaces. This is compared to the total 7,669 parking spaces required under the proposed Project (per parking ratios determined in Ordinance No. 168,847). Under existing conditions (considering the Advanced Health Sciences Pavilion as built), the CSMC Campus already provides 7,275 spaces, which exceeds the Master Plan parking requirement by 222 spaces. The No Project scenario (i.e., build-out of the Master Plan) would provide a 650-space parking structure, as originally proposed for the Rehab Center under the Master Plan. After demolition of the Existing Parking Lot, the No Project Alternative would be providing a net 433 parking spaces for the CSMC Campus. With the addition of the net 433 spaces, the CSMC Campus would contain a total of 7,708 parking spaces under the No Project Alternative. Thus, under the No Project Alternative, the planned CSMC Campus parking supply of 7,708 spaces would exceed the City parking requirement of 7,053 spaces (per the Original EIR) by a total of 655 spaces. In contrast, the 700 parking spaces proposed as part of the Project would contribute to a total of 7,758 spaces at the CSMC Campus, representing a surplus of 89 spaces over the 7,669-space requirement. In comparing the parking on the CSMC Campus under both scenarios, both the Project and the No Project Alternative would result in excess Campus parking supply, and thus less than significant impacts. However, the parking impact of the new facility under the No Project Alternative would be less than the proposed Project due to the larger amount of excess parking provided. In comparing the incremental impact of the No Project Alternative to the incremental impact of the proposed Project over the impacts determined in the Original EIR for build-out of the Master Plan, however, the No Project Alternative would result in a less than significant impact associated with parking, which is similar and comparable to the proposed Project.

e. Growth Inducing

The No Project Alternative would not result in an increased potential for new growth over the potential for new growth determined for build-out of the Master Plan in the Original EIR. As with the proposed Project, the No Project Alternative (i.e., medical uses on an existing medical campus) would not contain a residential or commercial component and would not be expected to incrementally induce substantial residential, commercial or population growth in the Project area. The net growth-inducing effect of the No Project scenario (i.e., build-out of the Master Plan) would be less than significant and comparable to the impact determined in the Original EIR. Further, because there would be no change to the Master Plan, the No Project Alternative would result in no incremental impact to incremental growth inducing impacts, and therefore are anticipated to be less than the impacts for the proposed Project.

f. Cumulative Impacts

Other Related Projects, similar to those anticipated with the proposed Project, would be expected to be developed and impacts corresponding to those developments are anticipated to occur. However, as the No Project Alternative would not contribute any change to the cumulative conditions beyond build-out of the Master Plan (as analyzed in the Original EIR), this alternative would have no significant incremental cumulative impacts.

g. Relationship of Alternative to Project Objectives

The No Project Alternative would avoid all of the net incremental impacts to the environment associated with the proposed Project (including those that would be less than significant and those that would be beneficial). However, the environmental impacts determined in the Original EIR for build-out of the Master Plan would still apply to the No Project Alternative and the adopted mitigation measures would still be required (if not already implemented). The No Project Alternative would not satisfy the Project objective to provide an additional 100 inpatient beds in the Southern California region and would not satisfy the Project objectives to support improved medical technologies and provide needed inpatient diagnostic and treatment facilities to the extent possible under the proposed Project. In summary, the No Project Alternative would not attain three Project objectives to the extent established for the proposed Project. For these reasons, and although some of the incremental impacts of the net Project would be avoided or minimized to some extent, the No Project Alternative is not considered a feasible alternative to the proposed Project.

h. Comparison of Alternative's Project Impacts

Table 36: Summary of Alternative Net Incremental Impacts and *Table 37: Alternatives Comparison to the Project* (below) provide a summary of the net incremental impacts by environmental issue for each of the proposed alternatives and a comparison of the net incremental impacts of each alternative relative to the level of impact anticipated with the proposed Project, respectively. As illustrated in *Table 36: Summary of Alternative Net Incremental Impacts*, the proposed Project would result in significant and unavoidable impacts to air quality and noise during the short-term construction phase. A significant impact to traffic during the long-term operational phase would be reduced to a less than significant level after mitigation implementation. For those issues addressed, the new building to be constructed under the No Project scenario would result in similar or reduced impacts; however, in terms of the incremental impacts over the impacts determined in the Original EIR for build-out of the Master Plan, the No Project Alternative would not result in any new or increased significant environmental impacts.

Implementation of the No Project Alternative would not result in new or incremental environmental impacts over those found in the Original EIR. Most of the significant and unavoidable impacts associated with the proposed Project would be avoided under the No Project Alternative, except for the significant and unavoidable impacts to air quality and noise during the construction (short-term) phase. However, none the potential benefits of the 200,000

additional square feet of inpatient uses and 100 inpatient beds would be implemented and the Project objectives would not be met.

V. ALTERNATIVES

C. ALTERNATIVE B: REDUCED PROJECT – NET INCREASE OF 150,000 SF

1. ALTERNATIVE DESCRIPTION

The "Reduced Project" Alternative would consist of build-out of the 700,000 square feet approved and vested under the Master Plan and an additional 150,000 square feet (or the equivalent to 75 inpatient beds) of new medical center uses. The Reduced Project Alternative represents a 25% reduction of the Project, with no reduction in the approved Master Plan. Under the Reduced Project Alternative, the Existing Building would be demolished and the Project Site would be redeveloped with approximately 410,650 square feet of medical center uses (90,000 square feet from the Existing Building, 170,650 square feet of development rights remaining under the Master Plan, and 150,000 square feet of new development rights) in a 10-story building. The associated parking structure to be developed on the Project Site would reflect a reduction of approximately 75 spaces, but it is assumed that the overall scale and configuration of the proposed seven-level parking structure would not change substantially as compared to the Project, even though the footprint may be slightly reduced.

The Reduced Project Alternative would require entitlements similar to those requested for the Project, except that the overall increases in intensity would be reduced proportionately. The Reduced Project Alternative would require the following:

- Zone Change to amend the conditions of the [T][Q]C2-2D-O zoning designation and to approve an additional 75 inpatient beds or 150,000 square feet of development entitlement for the CSMC Campus;
- Height District Change to increase the Campus-wide permitted floor area ratio (FAR).
- Amendment to the existing Development Agreement and Master Plan to permit the addition of 150,000 square feet of medical uses (or up to 75 inpatient beds) and related parking;
- Haul Route Permit;
- B-Permit for necessary street, sewer, storm drain, and lighting improvements;
- Grading Permits;
- Demolition Permits;
- Building Permits; and
- Any other necessary discretionary or ministerial permits and approvals required for the construction or operation of the Project.

The Reduced Project Alternative was selected because it provides for full implementation of the Master Plan and has the potential to accomplish many of the Project objectives by increasing the medical center intensity at the Project Site. Further, the Reduced Project Alternative has the potential to result in reduced impacts for those significant impacts identified with the Project, including those related to construction (including air quality and noise), as well as an overall reduction in related trip generation and traffic. Additionally, the Reduced Project Alternative has the potential to reduce aesthetic impacts, although these have already been determined to be less than significant for the Project, through a reduced building envelope.

2. ENVIRONMENTAL IMPACTS OF ALTERNATIVE

a. Aesthetics

Under the Reduced Project Alternative, the 150,000 square feet of inpatient uses would be incorporated into an approximately 410,650 square-foot building, thus, the visual changes to the Project Site would be similar to those identified for the proposed Project with slightly reduced building massing and height. The parking structure envelope may also be slightly reduced if the parking structure is reduced in size, but the change in appearance would not be discernable as compared to the proposed Project.

(1) Visual Character

Similar to the proposed Project, implementation of the Reduced Project Alternative on the Project Site would change the visual character from a 2-story, architecturally non-descript Existing Building and adjacent surface parking lot to a 10-story, approximately 175 foot tall modern-style medical tower and a 7-level parking structure (3 levels subterranean, 1 level at grade, 3 levels above grade). The Reduced Project Alternative would be similar in size and mass to the existing North and South Towers on the CSMC Campus. The architectural design and landscaping associated with the new building would also be consistent with the existing design theme of the CSMC Campus.

Overall, the Reduced Project Alternative would have a similar net impact to visual character as that identified for the proposed Project as both scenarios would provide for a more intensive Project Site with larger structures than currently exist. In the context of the existing urban character of the Project vicinity and CSMC Campus, neither the proposed Project nor the Reduced Project Alternative would substantially alter the valued visual character or image of the area from current conditions or from what was previously entitled for the Project Site under the Master Plan. Thus, both the Reduced Project Alternative and the proposed Project would have a less than significant impact on visual character. Both scenarios would also have a less than significant incremental visual character impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

(2) Alteration of Views

Implementation of the Reduced Project Alternative would increase visibility of development at the Project Site. The 2-story Existing Building and adjacent surface parking lot, which are

relatively obscured from view by the surrounding urban development, would be replaced by a 10-story tower structure and adjoining parking structure that would be taller than some of the surrounding development. However, the viewshed impacts of the Reduced Project scenario would be comparable to the impacts of the proposed Project as well as the Master Plan Rehab Center as described in the Original EIR. Both the Reduced Project Alternative and the proposed Project would be visually consistent with the surrounding CSMC structures and would thus result in less than significant impacts to existing views in the area. Both scenarios would also have a less than significant incremental viewshed impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

(3) Lighting and Glare

The Reduced Project Alternative would be subject to the Los Angeles Building Code and Municipal Code requirements regarding lighting and glare. Nighttime illumination from security lighting and interior lighting is expected under the Reduced Project scenario, but similar to the proposed Project, these impacts can be mitigated through window tinting, shielding and other regulatory requirements. Glare from windows and reflective surfaces may also be mitigated through Code and regulatory requirements. Both the proposed Project and the Reduced Project Alternative would take similar steps to mitigate impacts from lighting and glare to less than significant levels. Both scenarios would also have a less than significant incremental lighting and glare impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

b. Air Quality

(1) Construction Phase

Based upon construction assumptions for the peak amount of workers, haul trucks, construction equipment, construction hours and acreage per day on the Project Site, the Reduced Project Alternative would require substantially similar construction activity as assumed for the proposed Project. Similarly, as with the proposed Project, the Reduced Project Alternative would require the demolition of the Existing Building, grading/excavation and building construction. As such, daily regional and localized construction emissions associated with the Reduced Project Alternative would be similar to the proposed Project.[19]

As with the proposed Project, the Reduced Project Alternative would comply with SCAQMD Rule 403, as well as the mitigation measures that were adopted in connection with the approval of the Master Plan. The construction mitigation measures recommended for the proposed Project (see *Section IV.B: Air Quality* of this Draft SEIR) would also be recommended for the Reduced Project Alternative. As with the proposed Project, a significant and unavoidable regional NO_X impact and localized $PM_{2.5}$ and PM_{10} impacts are anticipated after implementation of mitigation measures.[20] Both scenarios would also have a significant and unavoidable incremental

[19] Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., August 7, 2008.
[20] Terry A. Hayes Associates, *Cedars-Sinai Medical Center West Tower Project Air Quality & Noise Impact Report,* August 7, 2008.

construction emissions impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.[21]

As with the proposed Project, the Reduced Project Alternative would demolish the Existing Building at the Project Site, which was built in 1947, and has the potential to contain ACMs and lead-based paint. Demolition of the Existing Building has the potential to result in accidental release of ACMs and lead into the atmosphere. However, with implementation of the mitigation measures contained in *Section IV.B: Air Quality* for the proposed Project, the Reduced Project Alternative would result in a less than significant impact associated with carcinogenic air toxics. Both scenarios could also be mitigated to a less than significant incremental air toxics impact beyond the impacts determined in the Original EIR for build-out of the Master Plan, and therefore would be comparable and similar.

Finally, as with the proposed Project, potential sources that may emit odors during construction of the Reduced Project Alternative would include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the Project Site. Similar to the proposed Project, the Reduced Project Alternative would utilize typical construction techniques, and the odors would be temporary and typical of most construction sites. In addition, the Reduced Project Alternative would be required to comply with regulations contained in SCAQMD Rule 402. Therefore, the construction odor impacts from both the Reduced Project Alternative and the proposed Project would be less than significant. Both scenarios would also have a less than significant incremental construction odor impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

(2) Operational Phase

Regional operational emissions from area and mobile sources associated with the Reduced Project Alternative would not exceed SCAQMD significance thresholds. Regional operational emissions for the Reduced Project Alternative would be slightly less than the proposed Project due to the reduction in size.[22] However, both the Reduced Project Alternative and the proposed Project would result in a less than significant operational emissions impact. Both scenarios would also have a less than significant incremental operational emissions impact beyond the impacts determined in the Original EIR for build-out of the Master Plan, and therefore would be comparable and similar.

In the build-out year of 2023, CO concentrations associated with the Reduced Project Alternative would result in a one-hour concentration of 2 ppm and an eight-hour concentration in a range between 1.2 ppm and 1.7 ppm. As with the proposed Project, the one- and eight-hour CO concentrations would not exceed the State standards and would result in a less than significant CO concentrations impact.[23] Both scenarios would also have a less than significant incremental

[21] Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., August 7, 2008.
[22] *Ibid.*
[23] Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., August 7, 2008.

CO concentrations impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

The Reduced Project Alternative would not include any substantial potential sources of acutely and chronically hazardous TACs. The Project may increase the amount of medical waste incinerated on the CSMC Campus. The Original EIR, which included mitigation measures to reduce reliance on hazardous materials, discussed regulations and impacts associated with medical waste incineration (e.g., dioxin emissions). However, CSMC has replaced the incinerator with two steam sterilizers. The steam sterilizers dispose of medical waste without generating dioxin emissions.[24] Thus, any increase in the amount of medical waste on the CSMC Campus resulting from the Project would not produce dioxin emissions. Therefore, neither the Reduced Project Alternative nor the proposed Project would release substantial amounts of TACs and both would result in less than significant impacts on human health. Both scenarios would also have a less than significant incremental TAC impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

The Reduced Project Alternative would develop the Project Site with hospital-related uses, which are not land uses that are typically associated with odor complaints. Similar to the proposed Project, on-site trash receptacles would have the potential to create adverse odors; however, as trash receptacles would be located and maintained in a manner that promotes odor control, no adverse odor impacts would result. Like the Project, odors associated with food preparation in a kitchen are not anticipated to be substantial under the No Project Alternative and would be controlled by the ventilation system of the new building to be constructed. Additionally, both the Reduced Project Alternative and the proposed Project would be required to comply with SCAQMD Rule 402 and thus both would result in a less than significant impact associated with operational odors. Both scenarios would also have a less than significant incremental operational odor impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

The Reduced Project Alternative would not increase population or housing in the Los Angeles subregion since this alternative does not include a residential component. The Reduced Project Alternative is expected to incrementally increase employment over existing conditions by approximately 543 persons[25], which is less than the proposed Project. This increase would represent less than one percent of the 278,264 new employment growth projected by SCAG between 2007 and 2023 for the Los Angeles subregion. As with the proposed Project, operations of the Reduced Project Alternative would not exceed SCAG growth forecasts and would be considered to be consistent with growth assumptions included in the AQMP. Therefore, neither the Reduced Project Alternative nor the proposed Project would cause or contribute to new air quality violations and both would be consistent with the AQMP, resulting in less than significant impacts. Both scenarios would also have a less than significant incremental AQMP consistency impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

[24] Health Care Without Harm, *Toolkit 7, Alternatives to Medical Waste Incineration: Stopping the Toxic Threat*, 2002.
[25] Southern California Association of Governments, *Employment Density Study Summary Report*, October 31, 2001.

Finally, the Reduced Project Alternative would not embody features that are not typical of an urban environment nor generate a disproportionate amount of vehicle miles traveled. This alternative would not have unique or disproportionately high fuel consumption characteristics and would be located in an urban area that is already planned for medical uses. Further, the Reduced Project Alternative would be required to comply with any applicable mitigation measures adopted in connection with the approval of the Master Plan and all AB-32 related regulations, as well as those mitigation measures recommended for the proposed Project (see *Section IV.B: Air Quality*). As such, both the Reduced Project Alternative and the proposed Project would have a negligible and less than significant effect on any increase in regional and national GHG emissions. Both scenarios would also have a less than significant incremental global climate change impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

c. Noise

(1) Construction Phase

Construction of the Reduced Project Alternative would involve similar types of demolition, grading/excavation and building construction activities as the proposed Project. As such, construction noise levels associated with the Reduced Project Alternative would be similar to the proposed Project. As with the proposed Project, construction-related noise levels would exceed the 5–dBA significance threshold at various sensitive receptors, such as the adjacent medical office building, resulting in a significant noise impact. With consideration of the nearest Related Project, both the Project and Reduced Project Alternative would result in a significant cumulative noise impact as well. Similarly, should pile driving be required for this alternative, vibration levels would have the potential to exceed the significance threshold of 0.5 inches per second PPV. With implementation of proper mitigation measures (see *Section IV.C: Noise*), including those that were adopted in connection with the approval of the Master Plan and Original EIR, the Reduced Project Alternative would be reduced to a less than significant short-term vibration impact. However, even with mitigation measures, both scenarios would result in a temporary significant and unavoidable construction noise impact (including cumulatively). Both scenarios would also have a significant and unavoidable incremental construction noise impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

(2) Operational Phase

Noise from the operation of existing uses is generated primarily by vehicular traffic coming to and from the Project Site. These levels would increase with any intensification of uses at the Project Site. The Reduced Project Alternative would generate a total of approximately 886 daily vehicle trips from the 75 inpatient beds associated with the Reduced Project scenario, which is less than the amount of traffic generated by the proposed Project.[26] The new 410,650 square-foot facility to be constructed at the Project Site would generate a total of approximately 9,675 daily

[26] Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., May 5, 2008.

vehicle trips, which is less than the West Tower to be constructed under the proposed Project. Noise levels for the Reduced Project Alternative would range from 67.1 to 74.6 dBA CNEL, which would be similar to or less than noise levels associated with the proposed Project. The greatest Project-related noise increase resulting from this alternative would be 0.3 dBA CNEL and would occur along Alden Drive-Gracie Allen Drive between Robertson Boulevard and George Burns Road. Thus, roadway noise levels attributed to both the Reduced Project Alternative and the proposed Project would increase by less than three dBA CNEL at all analyzed road segments, resulting in a less than significant impact. Both scenarios would also have a less than significant incremental operational vehicular noise impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

As with the proposed Project, the Reduced Project Alternative would also generate noise levels from mechanical equipment. However, the Reduced Project Alternative would be required to implement the mitigation measures recommended for the proposed Project and those that were adopted in connection with the approval of the Master Plan (i.e., the installation of sound attenuating devices on exhaust fans, enclosing mechanical equipment and providing sound absorbing and shielding provisions into the design of these equipment). Similar to the proposed Project, the mitigation measures would ensure that the mechanical equipment would not incrementally increase ambient noise levels by 5 dBA or more, thus resulting in a less than significant impact for both scenarios. Both scenarios would also have a less than significant incremental stationary noise impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

The Reduced Project Alternative would develop a similar seven-story, adjoining parking structure on the Project Site as the proposed Project, which would increase the noise level at the adjacent medical office building to the south by 0.1 dBA over the existing noise level to 65.9 dBA.[27] The other medical buildings (including the hospital) surrounding the Project Site would be farther away from the proposed parking structure and thus, incremental increases in noise levels at these buildings would be less than the adjacent medical office building. As the parking structure activity would not incrementally increase ambient noise levels by 5 dBA or more, parking noise under both the Reduced Project Alternative and the proposed Project would result in a less than significant impact. Both scenarios would also have a less than significant incremental parking noise impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

Finally, neither the Reduced Project Alternative nor the proposed Project would include significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the Project vicinity would be generated by vehicles and delivery trucks on the local roadways and would not be perceptible by sensitive receptors. Thus, operational vibration for both the Reduced Project Alternative and the proposed Project would result in a less than significant impact. Both scenarios would also have a less than significant incremental operational phase vibration impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

[27] Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., August 7, 2008.

d. Transportation and Circulation

(1) Traffic and LOS

Under the Reduced Project Alternative, a net increase of 85 vehicle trips during the weekday A.M. peak hour and 98 vehicle trips during the weekday P.M. peak hour are anticipated under the Future With Project Conditions (Build-out Year of 2023) for a total of 886 daily vehicle trips[28]. As a whole, the new 410,650 square-foot facility to be constructed at the Project Site would generate a total of approximately 9,675 daily vehicle trips, which is less than the new facility to be constructed under the proposed Project. The same intersections, Int. No. 2: Robertson Blvd./Alden Dr.-Gracie Allen Dr. and Int. No. 6: George Burns Rd./Beverly Blvd., would be impacted by the Reduced Project Alternative, however, the impacts are slightly reduced. At these two intersections, the Reduced Project Alternative would not result in a significant impact during the A.M. peak hour at both, but would result in a significant impact during the P.M. peak hour at both without mitigation measures.[29] In comparison, the proposed Project would result in significant impacts during the A.M. and P.M. peak hours at both intersections. Further, although LOS levels are substantially similar at all intersections, under both the Reduced Project Alternative and the proposed Project, the *V/C* values are slightly reduced under this alternative. Overall, however, both the Reduced Project Alternative and the proposed Project would result in significant impacts at the two intersections, which could be reduced to less than significant levels with implementation of proper mitigation measures (see *Section IV.D Transportation and Circulation* of this Draft SEIR). Both scenarios would also have a less than significant incremental traffic impact with mitigation implementation beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

(2) Access and Transit

Under the Reduced Project Alternative, improvements to internal Campus circulation, pedestrian safety and access enhancements would be implemented in a manner consistent with the proposed Project. The changes in driveway and pedestrian access points at the Project Site would be similar under both scenarios. Impacts to public transit in the Project area would be slightly less than the proposed Project due to the decrease in beds and the reduction in anticipated employees for the Reduced Project Alternative. Both scenarios would result in the addition of less than one Project-related transit rider per bus in the Project area during the A.M. and P.M. peak hours. Both the Reduced Project Alternative and the proposed Project would result in less than significant Project access and public transit impacts. Both scenarios would also have less than significant incremental access and transit impacts beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

[28] Linscott, Law & Greenspan Engineers, *CSMC Project Alternatives Analyses* email to Planning Associates Inc., August 5, 2008.
[29] *Ibid*.

(3) Parking

Similar to the proposed Project, the Reduced Project Alternative would include the construction of the adjacent seven-level parking structure on the Project Site. However, due to the reduced City parking requirement for this alternative, the parking structure would contain extra parking spaces for CSMC Campus use. The City parking requirement for the CSMC Campus with implementation of the Reduced Project Alternative would total 7,607 parking spaces compared to the 7,669 spaces required with the proposed Project.[30] Both scenarios would provide a CSMC Campus total of 7,758 parking spaces. Thus, under the Reduced Project Alternative, the planned CSMC Campus parking supply of 7,758 spaces would exceed the City parking requirement of 7,607 spaces by a total of 151 spaces. Therefore, the parking impact of both the Reduced Project Alternative and the proposed Project would be less than significant. Both scenarios would also have a less than significant incremental parking impact beyond the impacts determined in the Original EIR for build-out of the Master Plan, and therefore would be comparable and similar. It should be noted that there would continue to be an adverse impact to businesses on Robertson Boulevard and Beverly Boulevard due to the loss of on-street parking spaces as a result of recommended traffic mitigation measures at Intersection Nos. 2 and 6 (above) under both the Reduced Project Alternative and the proposed Project.

e. Growth Inducing

The Reduced Project Alternative would not result in a measurable increased potential for new growth. As with the proposed Project, the net growth-inducing effect of the Reduced Project scenario would be less than significant and may be slightly less than any potential associated with the proposed Project (see *Section VI.D: Growth-Inducing Impacts*).

f. Cumulative Impacts

Other Related Projects, similar to those anticipated with the proposed Project, would be expected to be developed and impacts corresponding to those developments are anticipated to occur. The Reduced Project Alternative would result in a contribution to cumulative impacts that is similar to, but slightly less than, that described for the proposed Project. With the implementation of mitigation measures similar to those recommended for the proposed Project, the alternative's contribution toward cumulative impacts would be less than significant, like the Project's.

g. Relationship of Alternative to Project Objectives

The Reduced Project Alternative would result in similar or slightly lower impacts for most of the environmental impacts associated with the proposed Project (including those that would already be less than significant). However, the level of significance determination of each environmental issue for both scenarios is comparable and similar. The Reduced Project Alternative would satisfy some of the Project objectives to the extent possible with the proposed Project, with a few notable exceptions. Specifically, the Reduced Project Alternative would only provide an additional 75% of the 100 inpatient beds desired in the Southern California region, which is not as many as the proposed Project. Further, due to the reduced floor area for inpatient services for

[30] Per parking requirements set forth in City of Los Angeles Ordinance No. 168,847.

this alternative, the Reduced Project scenario may not provide and support the needed inpatient diagnostic and treatment facilities or improved medical technologies to the extent possible and desired under the proposed Project. Therefore, the Reduced Project Alternative would not attain three of the Project objectives to the extent established and possible under the proposed Project.

h. Comparison of Alternative's Project Impacts

Table 36: Summary of Alternative Net Incremental Impacts and *Table 37: Alternatives Comparison to the Project* provide a summary of the proposed alternatives, the net incremental impacts by environmental issue for each of the proposed alternatives and a comparison of the net incremental impacts of each alternative relative to the level of impact anticipated with the proposed Project, respectively. As illustrated in *Table 36: Summary of Alternative Net Incremental Impacts*, the proposed Project would result in significant and unavoidable impacts to air quality and noise during the short-term construction phase. A significant impact to traffic during the long-term operational phase would be reduced to a less than significant level after mitigation implementation. The Reduced Project alternative would not avoid, but could slightly reduce, the temporary significant air quality and noise impacts; however, the level of significance determinations would be the same under both scenarios.

Implementation of the Reduced Project Alternative would result in similar or reduced environmental impacts for all issue areas compared to the proposed Project. While some of the impacts under this alternative may have somewhat lesser impacts relative to the proposed Project, none of the impacts would be totally avoided. Overall, the Reduced Project Alternative would result in a slightly reduced level of impact when compared to the proposed Project, but would retain similar and comparable level of significance determinations.

V. ALTERNATIVES

D. ALTERNATIVE C: CHANGE IN USE – OUTPATIENT SERVICES

1. ALTERNATIVE DESCRIPTION

The "Change in Use" Alternative would consist of build-out of the Master Plan plus the addition of 200,000 square feet of new medical center uses dedicated for outpatient services. The Change in Use Alternative would entail the addition of outpatient uses with no substantial change in the uses already entitled by the approved Master Plan. The 200,000 square feet of outpatient services would replace the 200,000 square feet for 100 inpatient beds requested by the Project. It should be noted that up to 52 residual inpatient beds could still be incorporated on the CSMC Campus per the previous entitlement. Under the Change in Use Alternative, the 90,000 square-foot Existing Building would be demolished and the Project Site would be redeveloped with approximately 460,650 square feet of medical center uses and a seven-level (or more) parking structure. The exterior building massing and design for the Change in Use Alternative is assumed to be essentially identical to that for the Project, although modifications may be necessary to address additional required parking, appropriate access and security for the outpatient services.

The Change in Use Alternative would require entitlements that are similar to those requested for the Project, except that the increases in intensity would be tied specifically to square footage increases for the purpose of outpatient services. The Change in Use Alternative would require the following:

- Zone Change to amend the conditions of the [T][Q]C2-2D-O zoning designation and to approve an additional 200,000 square feet of development entitlement for outpatient services;
- Height District Change to increase the permitted floor area ratio (FAR) on the CSMC Campus;
- Amendment to the Development Agreement and the Master Plan to permit an addition of 200,000 square feet of medical uses (for outpatient services) and related parking;
- Haul Route Permit;
- B-Permit for necessary street, sewer, storm drain, and lighting improvements;
- Grading Permits;
- Demolition Permits;

- Building Permits; and

- Any other necessary discretionary or ministerial permits and approvals required for the construction or operation of the Project.

The Change in Use Alternative was selected because it allows full implementation of the Master Plan and has the potential to accomplish many of the Project objectives by increasing the medical center intensity at the Project Site. As discussed earlier and determined in the Original EIR, the only feasible option for a change in use alternative at the Project Site is within the medical/hospital land use category. Since the proposed Project is currently made up of inpatient uses, the only option for an alternative is outpatient services. Further, changing the proposed uses from inpatient to outpatient uses has the potential to result in reduced impacts relative to those impacts identified with the Project. Although the overall construction related impacts would not change, the operational characteristics could change due to the shift from inpatient to outpatient services. The change in use may result in different vehicle trip characteristics and different visual and noise characteristics associated with the operation of this alternative.

2. ENVIRONMENTAL IMPACTS OF ALTERNATIVE

a. Aesthetics

Under the Change In Use Alternative, the visual changes to the Project Site would be substantially similar to those identified for the proposed Project. Building massing, height and design of the Change In Use Alternative would be identical to the proposed Project; however, the parking structure may need to be increased in massing, envelope or height to accommodate additional parking spaces that will be required for the CSMC Campus as a result of the change in use.

(1) Visual Character

Similar to the proposed Project, implementation of the Change In Use Alternative on the Project Site would change the visual character from a 2-story, architecturally non-descript Existing Building and adjacent surface parking lot to an 11-story, approximately 185 foot tall modern-style medical tower and a 7-level (or potentially larger) parking structure. The Change In Use Project Alternative would be similar in size and mass to the proposed Project as well as the existing North and South Towers on the CSMC Campus. The architectural design and landscaping associated with the new building would also be consistent with the existing design theme of the CSMC Campus.

The parking requirement for the outpatient services will be higher than the requirement for the inpatient services of the proposed Project (see Transportation and Circulation discussion below), thus the parking structure may need to be increased in size to accommodate additional parking. Although there will be an excess of parking created by a 700-space parking structure at the Project Site (as proposed for the Project), there would still be a shortfall in overall required parking on the CSMC Campus under this alternative. Potential infill parking development may also be required across the CSMC Campus. However, due to the size of the new medical

building and the urban character of the area, a heightened or larger parking structure on the Project Site beyond the seven levels of the proposed Project would not substantially affect the visual character of the area. The potential infill parking development at the CSMC Campus could require visual changes to existing parking structures, but these changes would be minor and would be consistent with the urban visual character of the CSMC Campus.

Overall, the Change In Use Project Alternative would have a similar impact to visual character as that identified for the proposed Project as both scenarios would provide for a more intensive Project Site with larger structures than currently exist. However, in the context of the existing urban character of the Project vicinity and CSMC Campus, neither the proposed Project nor the Change In Use Project Alternative would substantially alter the visual character or image of the area from current conditions or from what was previously entitled under the Master Plan. Therefore, both the Change In Use Project Alternative and the proposed Project would have a less than significant impact to visual character. Both scenarios would also have a less than significant incremental visual character impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

(2) Alteration of Views

Implementation of the Change In Use Project Alternative would increase visibility of development at the Project Site from existing conditions, which currently include the Existing Parking Lot and the Existing Building. The 2-story Existing Building and adjacent surface parking lot, which are relatively obscured from view by the surrounding urban development, would be replaced by an 11-story tower structure and adjoining parking structure that would be taller than some of the surrounding development. However, the viewshed impacts of the Change In Use Project scenario would be comparable to impacts of the proposed Project. Both the Change In Use Project Alternative and the proposed Project would be visually consistent with the surrounding CSMC structures and would result in less than significant impacts to existing views in the area. Both scenarios would also have a less than significant incremental viewshed impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

(3) Lighting and Glare

The Change In Use Project Alternative would be subject to the Los Angeles Building Code and Municipal Code requirements regarding lighting and glare. Unlike inpatient services, the proposed outpatient services are expected to operate during daytime business hours, thus nighttime illumination may be slightly reduced from interior lighting. However, nighttime illumination from security lighting is expected to remain the same under the Change In Use Project scenario. The impacts of nighttime illumination from both the Change In Use Project Alternative and the proposed Project can be mitigated through window tinting, shielding and other regulatory requirements. Glare from windows and reflective surfaces may also be mitigated through Code and regulatory requirements. Both the proposed Project and the Change In Use Project Alternative would take similar steps to mitigate impacts from lighting and glare to less than significant levels. Both scenarios would also have a less than significant incremental

lighting and glare impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

b. Air Quality

(1) Construction Phase

Based upon construction assumptions for the peak amount of workers, haul trucks, construction equipment, construction hours and acreage per day on the Project Site, the Change In Use Project Alternative would require similar construction activity as assumed for the proposed Project. Similarly, as with the proposed Project, the Change In Use Project Alternative would require the demolition of the Existing Building, grading/excavation and building construction. As such, daily regional and localized construction emissions associated with the Change In Use Project Alternative would be similar to the proposed Project.

As with the proposed Project, the Change In Use Project Alternative would comply with SCAQMD Rule 403 as well as the mitigation measures that were adopted in connection with the approval of the Master Plan. The construction mitigation measures recommended for the proposed Project (see *Section IV.B: Air Quality* of this Draft SEIR) would also be recommended for the Change In Use Project Alternative.[31] As with the proposed Project, a significant and unavoidable regional NO_X impact and localized $PM_{2.5}$ and PM_{10} impacts are anticipated after implementation of mitigation measures. Both scenarios would also have a significant and unavoidable incremental construction emissions impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

As with the proposed Project, the Change In Use Project Alternative would demolish the Existing Building at the Project Site, which was built in 1947, and has the potential to contain ACMs and lead-based paint. Demolition of the Existing Building has the potential to result in accidental release of ACMs and lead into the atmosphere. However, with implementation of the mitigation measures contained in *Section IV.B: Air Quality* for the proposed Project, both the Change In Use Project Alternative and the proposed Project would result in a less than significant impact associated with carcinogenic air toxics. Both scenarios would also have a less than significant incremental air toxics impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

Finally, as with the proposed Project, potential sources that may emit odors during construction of the Change In Use Project Alternative would include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the Project Site. Similar to the proposed Project, the Change In Use Project Alternative would utilize typical construction techniques, and the odors would be temporary and typical of most construction sites. In addition, the Change In Use Project Alternative would be required to comply with regulations contained in SCAQMD Rule 402. Therefore, the construction odor impact from both the Change In Use Project Alternative and the proposed Project would be less than significant. Both scenarios would also have a less than significant incremental construction odor impact

[31] Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., August 7, 2008.

beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

(2) Operational Phase

Regional operational emissions from area and mobile sources associated with the Change In Use Project Alternative would exceed SCAQMD significance thresholds for VOC, NO_X, CO and PM_{10}.[32] Regional operational emissions for the Change In Use Project Alternative would be greater than the proposed Project due to the conversion of the Project's inpatient services to outpatient services and the subsequent increase in vehicular traffic associated with these outpatient services (see Transportation and Circulation below). Since operational emissions are primarily generated by motor vehicles, and no feasible mitigation measures are available to reduce emissions from motor vehicles, the Change In Use Project Alternative would result in a significant and unavoidable long-term air quality impact, which is greater than the proposed Project. Therefore, the Change In Use scenario would result in a significant and unavoidable incremental operational emissions impact beyond the impacts determined in the Original EIR for build-out of the Master Plan, and therefore would result in a greater impact than the proposed Project.

In the build-out year of 2023, CO concentrations associated with the Change In Use Project Alternative would result in a one-hour concentration of 2 ppm and an eight-hour concentration in a range between 1.2 ppm and 1.7 ppm.[33] As with the proposed Project, the one- and eight-hour CO concentrations would not exceed the State standards and would result in a less than significant CO concentrations impact. Both scenarios would also have a less than significant incremental CO concentrations impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

The Change In Use Project Alternative would not include any substantial potential sources of acutely and chronically hazardous TACs. The Project may increase the amount of medical waste incinerated on the CSMC Campus. The Original EIR, which included mitigation measures to reduce reliance on hazardous materials, discussed regulations and impacts associated with medical waste incineration (e.g., dioxin emissions). However, CSMC has replaced the incinerator with two steam sterilizers. The steam sterilizers dispose of medical waste without generating dioxin emissions.[34] Thus, any increase in the amount of medical waste on the CSMC Campus resulting from the Project would not produce dioxin emissions. Therefore, neither the Change In Use Project Alternative nor the proposed Project would release substantial amounts of TACs and both would result in less than significant impacts on human health. Both scenarios would also have a less than significant incremental TAC impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

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[32] Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., August 7, 2008.
[33] *Ibid*.
[34] Health Care Without Harm, *Toolkit 7, Alternatives to Medical Waste Incineration: Stopping the Toxic Threat*, 2002.

The Change In Use Project Alternative would develop the Project Site with hospital-related uses, which are not land uses that are typically associated with odor complaints. Similar to the proposed Project, on-site trash receptacles would have the potential to create adverse odors. However, as trash receptacles would be located and maintained in a manner that promotes odor control, no adverse odor impacts would result. Like the Project, odors associated with food preparation in a kitchen are not anticipated to be substantial under the No Project Alternative and would be controlled by the ventilation system of the new building to be constructed. Additionally, both the Change In Use Project Alternative and the proposed Project would be required to comply with SCAQMD Rule 402 and thus both would result in a less than significant impact associated with operational odors. Both scenarios would also have a less than significant incremental operational odor impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

The Change In Use Project Alternative would not increase population or housing in the Los Angeles subregion since this alternative does not include a residential component. The Change In Use Project Alternative is expected to incrementally increase employment by approximately 606 persons[35], which is the same as the proposed Project. This increase would represent less than one percent of the 278,264 new employment growth projected by SCAG between 2007 and 2023 for the Los Angeles subregion.[36] As with the proposed Project, operations of the Change In Use Project Alternative would not exceed SCAG growth forecasts and would be considered to be consistent with growth assumptions included in the AQMP. Therefore, neither the Change In Use Project Alternative nor the proposed Project would cause or contribute to new air quality violations and both would be consistent with the AQMP, resulting in less than significant impacts. Both scenarios would also have a less than significant incremental AQMP consistency impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

Finally, the Change In Use Project Alternative would not embody features that are not typical of an urban environment or generate a disproportionate amount of vehicle miles traveled. This alternative would not have unique or disproportionately high fuel consumption characteristics and would be located in an urban area that is already planned for medical uses.[37] Further, the Change In Use Project Alternative would be required to comply with any applicable mitigation measures adopted in connection with the approval of the Master Plan and Original EIR and all AB-32 related regulations, as well as those mitigation measures recommended for the proposed Project (see *Section IV.B: Air Quality*). As such, both the Change In Use Project Alternative and the proposed Project would have a negligible and less than significant effect on any increase in regional and national GHG emissions. Both scenarios would also have a less than significant incremental global climate change impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

[35] Southern California Association of Governments, *Employment Density Study Summary Report*, October 31, 2001.
[36] Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., August 7, 2008.
[37] *Ibid*.

c. Noise

(1) Construction Phase

Construction of the Change In Use Project Alternative would involve similar types of demolition, grading/excavation and building construction activities as the proposed Project. As such, construction noise levels associated with the Change In Use Project Alternative would be similar to the proposed Project. As with the proposed Project, construction-related noise levels would exceed the 5–dBA significance threshold at various sensitive receptors, resulting in a significant noise impact.[38] With consideration of the nearest Related Project, both the Project and the Change In Use Project Alternative would result in a significant cumulative noise impact as well. Similarly, should pile driving be required for this alternative, vibration levels would have the potential to exceed the significance threshold of 0.5 inches per second PPV. With implementation of proper mitigation measures (see *Section IV.C: Noise*), including those that were adopted in connection with the approval of the Master Plan and Original EIR, the Change In Use Project Alternative would be reduced to a less than significant short-term vibration impact; however, even with mitigation measures, both scenarios would result in a temporary significant and unavoidable construction noise impact (including cumulatively). Therefore, both scenarios would also have a significant and unavoidable incremental construction noise impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

(2) Operational Phase

Noise from the operation of existing uses is generated primarily by vehicular traffic coming to and from the Project Site. These levels would increase with any intensification of uses at the Project Site. The Change In Use Project Alternative would generate a total of approximately 7,963 daily vehicle trips from the 200,000 square feet of outpatient services associated with the Change In Use Project scenario, which is greater than the amount of traffic generated by the 100 inpatient beds (200 square feet) for the proposed Project.[39] The new 460,650 square-foot facility to be constructed at the Project Site would generate a total of approximately 16,752 daily vehicle trips, which is greater than the new facility to be constructed under the proposed Project.[40] Noise levels for the Change In Use Project Alternative would range from 68.0 to 74.8 dBA CNEL, which would be similar to or greater than noise levels associated with the proposed Project.[41] The greatest Project-related noise increase resulting from this alternative would be 1.2 dBA CNEL and would occur along Alden Drive-Gracie Allen Drive between Robertson Boulevard and George Burns Road.[42] Thus, roadway noise levels attributed to both the Change In Use Project Alternative and the proposed Project would increase by less than 3 dBA CNEL at all analyzed road segments, resulting in a less than significant impact. Both scenarios would also have a less than significant incremental operational vehicular noise impact beyond the impacts

[38] Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., August 7, 2008.
[39] *Ibid*.
[40] *Ibid*.
[41] *Ibid*.
[42] *Ibid.*

determined in the Original EIR for build-out of the Master Plan, and therefore would be comparable and similar. It must be noted that unlike inpatient service facilities, which may operate 24 hours daily, the medical tenants utilizing the outpatient space could be expected to operate under regular business hours and thus may confine traffic noise during the daytime, which may reduce operational noise impacts further.

As with the proposed Project, the Change In Use Project Alternative would also generate noise levels from mechanical equipment. However, the Change In Use Project Alternative would be required to implement the mitigation measures recommended for the proposed Project and those that were adopted in connection with the approval of the Master Plan and Original EIR (i.e., the installation of sound attenuating devices on exhaust fans, enclosing mechanical equipment and providing sound absorbing and shielding provisions into the design of these equipment). Similar to the proposed Project, the mitigation measures would ensure that the mechanical equipment would not incrementally increase ambient noise levels by 5 dBA or more, thus resulting in a less than significant impact for both scenarios. Both scenarios would also have a less than significant incremental stationary noise impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

The Change In Use Project Alternative may develop a similar or larger parking structure in comparison to the 7-level adjoining parking structure of the proposed Project. A similar parking structure would mimic the proposed Project by increasing the noise level at the adjacent medical office building to the south by 0.1 dBA over the existing noise level to 65.9 dBA.[43] The other medical buildings (including the hospital) surrounding the Project Site would be farther away from the proposed parking structure and thus, incremental increases in noise levels at these buildings would be less than the adjacent medical office building. A larger parking structure with higher capacity for vehicles may increase the noise level at the adjacent medical office building by a slightly larger dBA. However, in both scenarios, parking structure activity would not incrementally increase ambient noise levels by 5 dBA or more; therefore, parking noise under both the Change In Use Project Alternative and the proposed Project would result in a less than significant impact. Both scenarios would also have a less than significant incremental parking noise impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

Finally, neither the Change In Use Project Alternative nor the proposed Project would include significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the Project vicinity would be generated by vehicles and delivery trucks on the local roadways and would not be perceptible by sensitive receptors. Thus, operational vibration for both the Change In Use Project Alternative and the proposed Project would result in a less than significant impact. Both scenarios would also have a less than significant incremental operational phase vibration impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

[43] Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., August 7, 2008.

d. Transportation and Circulation

(1) Traffic and LOS

Under the Change in Use Alternative, a net increase of 496 vehicle trips during the weekday A.M. peak hour and 600 vehicle trips during the weekday P.M. peak hour are anticipated under the Future With Project Conditions (Build-out Year of 2023) for a total of 7,963 additional daily vehicle trips.[44] As a whole, the new 460,650 square-foot facility to be constructed at the Project Site would generate a total of approximately 16,752 daily vehicle trips, which is greater than the new facility to be constructed under the proposed Project.[45] Contrary to the two intersections impacted by the proposed Project, the Change In Use Project Alternative would result in significant impacts to 17 of the 22 study intersections in the Project area during the A.M. and/or P.M. peak hours. A total of 15 of these 17 intersections would be operating at an LOS E or LOS F under Future With Project Conditions in the A.M. and/or P.M. peak hours. The same intersections would also have operated at an LOS E or LOS F in the A.M. and P.M. peak hours under Future Pre-Project Conditions with Related Projects. The capacity for improvements at some intersections has been reached, so the ability to implement mitigation measures to reduce impacts to less than significant levels may be unavoidable. Thus, the Change In Use Project Alternative may result in a significant and unavoidable long-term traffic impact, which is greater than the traffic impact associated with the proposed Project. Therefore, the Change In Use scenario would result in a significant and unavoidable incremental traffic impact beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would have a greater impact than the proposed Project.

(2) Access and Transit

Under the Change In Use Project Alternative, improvements to internal Campus circulation, pedestrian safety and access enhancements would be implemented in a manner consistent with the proposed Project. The changes in driveway and pedestrian access points at the Project Site would be the same under both scenarios. In terms of public transit impacts, the Change In Use Project Alternative would generate approximately 24 A.M. peak hour transit trips and 29 P.M. peak hour transit trips. Over a 24-hour period, this alternative would generate demand for 390 daily transit trips. For the 11 transit lines in the Project area, which provide service for an average of 93 buses during the A.M. peak hour and roughly 94 buses during the P.M. peak hour[46], the Change In Use Project Alternative would add less than one Project-related transit rider per bus during both the A.M. and P.M. peak hours. Whereas the Change In Use Project Alternative would result in a greater number of public transit riders in the Project area over the proposed Project, both would result in a less than significant impact based on the existing capacity of public transit in the area. Overall, both the Change In Use Project Alternative and the proposed Project would result in less than significant Project access and public transit impacts.

[44] Linscott, Law & Greenspan Engineers, *CSMC Project Alternatives Analyses* email to Planning Associates Inc., August 5, 2008.
[45] Terry A. Hayes Associates, *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates, Inc., August 7, 2008.
[46] Linscott, Law & Greenspan Engineers, *Traffic Impact Study Cedars Sinai Medical Center Project*, June 23, 2008 (see *Appendix E: Traffic Impact Study*)

Both scenarios would also have less than significant incremental access and transit impacts beyond the impacts determined in the Original EIR for build-out of the Master Plan and, therefore, would be comparable and similar.

(3) Parking

Similar to the proposed Project, the Change In Use Project Alternative would include the construction of an adjoining parking structure on the Project Site. However, due to the increased City parking requirement for this alternative, the parking structure would need to contain more parking spaces than the parking structure adjoining the proposed Project. The City parking requirement for the CSMC Campus with implementation of the Change In Use Project Alternative would total 8,419 parking spaces compared to the 7,669 spaces required with the proposed Project.[47] Under the proposed Project, the 7-level parking structure would help provide a CSMC Campus total of 7,758 parking spaces. However, the Change In Use Project Alternative would be required to include an additional approximately 661 spaces to the adjoining parking structure or to the CSMC Campus in order to meet City requirements. Although much of this additional required parking could be included in the proposed parking structure, the parking structure size would be limited by spatial restrictions at the Project Site and height restrictions imposed by the City. Thus, additional spaces would likely be infilled within existing parking structures throughout the CSMC Campus. This would require expansions or construction of a new parking structure, which may require demolition of an existing facility. These changes would potentially result in increased incremental impacts over the impacts determined for build-out of the Master Plan in the Original EIR. Therefore, the parking impact of the Change In Use Project Alternative would be greater than the proposed Project and would result in a significant impact if additional parking were not provided on the CSMC Campus. Assuming the provision of additional parking on the CSMC Campus, both scenarios would have a less than significant incremental parking impact beyond the impacts determined in the Original EIR for build-out of the Master Plan, and therefore would be comparable and similar. It must be noted that there may be additional adverse impacts to businesses on surrounding roadways due to the loss of on-street parking spaces as a result of recommended traffic mitigation measures at various impacted intersections.

e. Growth Inducing

Like the proposed Project, the Change In Use Project Alternative is not anticipated to result in a measurable increased potential for new growth. As with the proposed Project, the net growth-inducing effect of the Change In Use Project scenario would be less than significant and may be slightly less than any potential associated with the proposed Project (see *Section VI.D: Growth-Inducing Impacts*).

f. Cumulative Impacts

The same Related Projects for the proposed Project would be expected to be developed under the Change In Use Project Alternative and the impacts corresponding to those developments are anticipated to occur. The Change In Use Project Alternative would result in a significant

[47] Per parking requirements established under City of Los Angeles Ordinance No. 168,847.

contribution to cumulative traffic impacts that are greater than the proposed Project. Due to the increase in traffic on the surrounding street network and the LOS impacts at several study intersections, the Change In Use Project Alternative is anticipated to result in significant impacts. Even with the implementation of mitigation measures, certain impacted intersections may have reached mitigation capacity; thus, this alternative's contribution toward cumulative impacts may be significant and unavoidable.

g. Relationship of Alternative to Project Objectives

The Change In Use Project Alternative would result in similar and comparable impacts for most of the environmental impacts associated with the proposed Project (including those that would already be less than significant), but would result in greater impacts and level of significance determinations for long-term operational air quality, traffic, and cumulative effects. The Change In Use Project Alternative would also satisfy most of the Project objectives to the extent possible with the proposed Project, with a few important exceptions. Specifically, the Change In Use Project Alternative would not provide any (0%) additional inpatient beds desired in the Southern California region. Further, due to the conversion of floor area to outpatient services for this alternative, the Change In Use Project scenario will not provide and support the needed inpatient diagnostic and treatment facilities or improved medical technologies to the extent possible and desired under the proposed Project. Therefore, the Change In Use Project Alternative would not attain three of the Project objectives to the extent established and possible under the proposed Project.

h. Comparison of Alternative's Project Impacts

Table 36: Summary of Alternative Net Incremental Impacts and *Table 37: Alternatives Comparison to the Project* provide a summary of the proposed alternatives, the net incremental impacts by environmental issue for each of the proposed alternatives and a comparison of the net incremental impacts of each alternative relative to the level of impact anticipated with the proposed Project, respectively. As illustrated in *Table 36: Summary of Alternative Net Incremental Impacts*, the proposed Project would result in significant and unavoidable impacts to air quality and noise during the short-term construction phase. A significant impact to traffic during the long-term operational phase would also occur. Due to the mitigation capacity utilization of several intersections impacted by the Change In Use Project Alternative, it is anticipated that this alternative would not be able to mitigate the significant impacts at several study intersections to less than significant levels, thus resulting in significant and unavoidable traffic impacts. The Change In Use Project scenario would not avoid the temporary significant air quality and noise impacts, and could potentially create a significant and unavoidable impact to long-term operational air quality and traffic. Significant impacts to parking would also result if additional parking spaces were not provided on the CSMC Campus.

Although conversion of inpatient to outpatient services under the Change In Use Project Alternative was anticipated to reduce certain air quality, noise and traffic impacts (or confine them to certain hours of the day) due to the types of medical equipment (or lack of) and operational hours associated with the outpatient services, these impact reductions would be negligible and substantially similar to, or in some cases greater than, the proposed Project.

Implementation of the Change In Use Project Alternative would result in similar or increased environmental impacts for all issue areas compared to the proposed Project. Some of the impacts under this alternative could be somewhat greater impacts relative to the proposed Project and none of the impacts would be completely avoided. Overall, the Change In Use Project Alternative would result in an increased level of impact when compared to the proposed Project.

V. ALTERNATIVES

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the CEQA Guidelines requires that an EIR identify the environmentally superior alternative. If the "No Project" alternative is the environmentally superior alternative, then the EIR must identify an environmentally superior alternative among the remaining alternatives.

Based on the analysis of the Draft SEIR, the proposed Project is anticipated to result in significant unavoidable impacts related to:

- Construction (short-term) air quality impacts related to NO_X, PM_{10} and $PM_{2.5}$
- Construction (short-term) noise impacts at sensitive receptors

Table 37: Alternatives Comparison to the Project, provides a matrix that compares the impacts of each alternative relative to the level of impact anticipated with the proposed Project. A more detailed description of each alternative and the potential impacts associated with each is provided above.

Of the alternatives analyzed in this Draft SEIR, the No Project Alternative is considered the overall environmentally superior alternative as it would reduce and/or avoid the majority of the impacts (even those that would be less than significant) that would occur with implementation of the proposed Project. However, the No Project Alternative would not substantially satisfy the objectives of the Project.

In accordance with the CEQA Guidelines, a second alternative must be established as environmentally superior when the No Project Alternative is the primary superior alternative. The comparative evaluation indicates that the Reduced Project Alternative would also be environmentally superior. The Reduced Project Alternative would result in the reduction of more Project impacts than the remaining alternative. Primarily, the Reduced Project Alternative would reduce the transportation and circulation impacts associated with the proposed Project due to the reduced size of this alternative. However, the Reduced Project Alternative would not meet the Project objective to provide 100 additional inpatient beds in the region and Project objectives to support improved medical technologies and to provide needed inpatient diagnostic and treatment facilities may not be fulfilled to the extent desired or possible under the proposed Project due to the reduction in inpatient and building space.

TABLE 36
SUMMARY OF ALTERNATIVE NET IMPACTS

PROJECT PHASE	PROPOSED PROJECT	ALT A NO PROJECT	ALT B REDUCED PROJECT	ALT C CHANGE-IN-USE PROJECT
AESTHETICS				
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	No impact	Less than significant	Less than significant
Cumulative	Less than significant	No impact	Less than significant	Less than significant
AIR QUALITY				
Construction (Short-Term)	Significant	No impact	Significant	Significant
Operation (Long-Term)	Less than significant	No impact	Less than significant	Significant
Cumulative	Less than significant	No impact	Less than significant	Significant
NOISE				
Construction (Short-Term)	Significant	No impact	Significant	Significant
Operation (Long-Term)	Less than significant	No impact	Less than significant	Less than significant
Cumulative	Less than significant	No impact	Less than significant	Less than significant
TRANSPORTATION AND CIRCULATION				
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant
Operation (Long-Term)	Less than significant with mitigation	No impact	Less than significant with mitigation	Significant
Cumulative	Less than significant	No impact	Less than significant	Significant
CUMULATIVE EFFECTS				
Construction (Short-Term)	Not applicable	Not applicable	Not applicable	Not applicable
Operation (Long-Term)	Less than significant	No impact	Less than significant	Significant
Cumulative	Less than significant	No impact	Less than significant	Significant
GROWTH INDUCTING IMPACTS				
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	No impact	Less than significant	Less than significant
Cumulative	Less than significant	No impact	Less than significant	Less than significant

TABLE 37
ALTERNATIVES COMPARISON TO THE PROJECT

ALTERNATIVE ID	ALTERNATIVE TITLE	AESTHETICS	AIR QUALITY	NOISE	TRANSPORTATION AND CIRCULATION	CUMULATIVE EFFECTS	GROWTH INDUCING	OTHER IMPACTS
CONSTRUCTION PHASE (SHORT-TERM)								
A	No Project (Master Plan Build-out)	—	∞	∞	—	—	N/A	—
B	Reduced Project (150K Additional)	¤	√	√	¤	¤	N/A	¤
C	Change in Use (Outpatient Services)	¤	¤	¤	¤	¤	N/A	¤
OPERATIONAL PHASE (LONG-TERM)								
A	No Project (Master Plan Build-out)	—	—	—	—	—	—	—
B	Reduced Project (150K Additional)	¤	—	—	—	¤	¤	¤
C	Change in Use (Outpatient Services)	¤	►	▲	►	►	¤	¤
CUMULATIVE (LONG-TERM/OPERATIONAL)								
A	No Project (Master Plan Build-out)	—	—	—	—	—	—	—
B	Reduced Project (150K Additional)	¤	—	¤	—	¤	¤	¤
C	Change in Use (Outpatient Services)	¤	►	¤	►	►	¤	¤

Key:
¤ = Net incremental impact is equivalent to that identified for the Project
▲ = Net incremental impact is greater than that identified for the Project, but remains less than significant (either with mitigation or not)
▼ = Net incremental impact is greater than that identified for the Project and thus remains a significant impact
► = Net incremental impact is greater than that identified for the Project and becomes a significant impact
— = Net incremental impact is less than that identified for the Project and thus remains a less than significant impact (either with mitigation or not)
√ = Net incremental impact is less than that identified for the Project, but remains a significant impact
∞ = Net incremental impact is less than that identified for the Project, and becomes a less than significant impact

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

A. EFFECTS NOT FOUND TO BE SIGNIFICANT

An Initial Study ("IS") was prepared for the Project. Pursuant to CEQA Guidelines Section 15063, the IS for the Project was used to: 1) provide the Lead Agency with information for deciding whether to prepare and EIR; 2) assist in the preparation of an EIR 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 could be used to support the Project.

The City of Los Angeles determined that the preparation of a Supplemental EIR was appropriate for the Project; thus, consistent with those provisions, and in accordance with CEQA Guidelines Sections 15162 and 15163, the IS considered 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.

Based on the IS and Notice of Preparation ("NOP") process, it was determined that implementation of the Project may, by itself and/or in conjunction with past, present and reasonably foreseeable future development in the Project vicinity, have a significant environmental effect in the following areas: Aesthetics/Visual Resources, Air Quality, Noise, Traffic/Circulation/Access and Cumulative Effects. This SEIR analyzes these potential environmental impacts and recommends additional feasible mitigation measures to reduce impacts found likely to be significant.

In accordance with CEQA Guidelines Section 15128, other possible effects of the Project, which were determined to not be significant through the IS review and NOP scoping process, are not discussed in detail in this SEIR. Those possible effects which did not warrant detailed analysis are identified below. The specific issues, as defined by the IS checklist questions or *L.A. CEQA Thresholds Guide* ("*Thresholds Guide"*) screening criteria[1], are identified, followed by the impact analysis.

[1] City of Los Angeles, Dept. of Environmental Affairs. L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles. 2006

Aesthetics (Views, Scenic, Shade/Shadow)

The Project will not:

- Have a substantial adverse effect on a scenic vista.
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway.
- Include light-blocking structures in excess of 60 feet in height above the ground elevation that would be located within a distance of three times the height of the proposed structure to a shadow-sensitive use on the north, northwest or northeast.

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.

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 viewshed.

Development of the Project may increase the visibility of 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 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 the 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.

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 A.M. and 3:00

P.M. 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 A.M. and 4:00 P.M. 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. In summary, the shadows from 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.

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 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.

The potential significance of the Project's impacts related to visual character, long-range views and lighting is addressed in *Section IV: Environmental Impact Analysis: A-Aesthetics*.

Agriculture

The Project will not:

- 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.
- Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland to non-agricultural use.

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.

Biological Resources

The Project will not:

- 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.
- 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 U.S. Fish and Wildlife Service.
- 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.
- 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.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation 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.

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.

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.

Cultural Resources

The Project will not:

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

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.

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.

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.

Geology and Soils

The Project will not:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
    - 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,
    - Strong seismic ground shaking,
    - Seismic-related ground failure, including liquefaction,
    - Landslides.
- Result in substantial soil erosion or the loss of topsoil.
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Proposed Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
- 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.
- 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.

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 exist 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.

Seismic Ground Shaking - 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. 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.

Seismic-related ground failure, including liquefaction - 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. 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.

Landslides - 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.

Soil erosion or the loss of topsoil - 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. 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.

Unstable Soil – Based on the conclusions of the Original EIR (and the accompanying Geotechnical Evaluation[2]), 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.

Expansive Soil – 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.

Alternative Wastewater Disposal Systems - 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.

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 geology and soils 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.

Hazards and Hazardous Materials

The Project will not:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- 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

[2] *Report of Geotechnical Evaluation for Environmental Impact, Cedars-Sinai Medical Center Master Plan*, prepared by Law/Crandall, Inc., April 16, 1991.

- 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.
- Be 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, where the Proposed Project would result in a safety hazard for people residing or working in the Project area.
- Be within the vicinity of a private airstrip, where the proposed Project would result in a safety hazard for people residing or working in the Project area.
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- 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.

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.

Hazardous Materials - 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.

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.

Airport Safety - 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.

Emergency Response Plans - 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.

Wildland Fires - 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.

Therefore, the Project is not anticipated to result in significant impacts associated with wildland fires 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 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.

Hydrology and Water Quality

The Project will not:

- Violate any water quality standards or waste discharge requirements.
- 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).
- 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.
- 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.
- 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.
- Otherwise substantially degrade water quality.
- 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.
- Place within a 100-year flood hazard area structures that would impede or redirect flood flows.
- 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.
- Inundation by seiche, tsunami, or mudflow.

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.

Water Quality - The Project Site is within the Los Angeles Region (4) of the Regional Water Quality Control Board (the "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 (the "EPA") publishes regulations establishing the "NPDES" permit application requirements for storm water discharges. As an agent of the State Water Resources Control Board the (the "SWRCB"), RWQCBs are authorized to implement a municipal storm water permitting programs 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 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 discharges 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.

Groundwater - Potable water is currently supplied to the Project Site by the Los Angeles Department of Water and Power (the "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.

Drainage – 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.

Flood Zone/Flood Hazard – 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.

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.

Land Use and Planning

The Project will not:

- Physically divide an established community.
- 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.
- Conflict with any applicable habitat conservation plan or natural community conservation 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.

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 CSMC Campus.

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 Guid*e screening criteria, it was determined that the Project would be consistent with the General Plan and would not require a General Plan amendment.

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 nomenclature 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.

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.

Mineral Resources

The Project will not:

- 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.
- 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.

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.

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.

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.

Noise (Airport)

The Project will not:

- Be 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, where the Project would expose people residing or working in the Project area to excessive noise levels.
- Be within the vicinity of a private airstrip, where the Project would expose people residing or working in the Project area to excessive noise levels.

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.

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.

Therefore, the Project is not anticipated to result in significant impacts associated with airport noises, and further evaluation of such 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 new significant environmental impacts with respect to airport noises 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.

The potential significance of impacts related to other noise issues is addressed in *Section IV.B: Noise*.

Population, Housing and Employment

The Project will not:

- 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).
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

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.

The Project Site is currently developed with medical facilities and parking lot uses, and is 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; the Project would not 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; and the Project would not involve displacement of existing housing and/or residents.

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.

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.

Public Services

The Project will not:

- 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:
    - Fire protection,
    - Police protection during Project construction,
    - Schools,
    - Parks,
    - Other public facilities.

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.

Fire Protection Services - The Los Angeles Fire Department (the "LAFD") 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	1.7 miles
Fire Station No. 61 Task Force Station – Truck and Engine Company 5821 West Third Street	2.0 miles
Fire Station No. 41 Single Engine Company 1439 North Gardner Street	3.2 miles

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 Master Plan, including the Project. Therefore, the Project's potential impacts related to fire protection would be adequately mitigated to less than significant levels and further analysis is not required.

As indicated in *Thresholds Guide*, the Project could result in a significant impact if the following is true:

- The Project Site is located in a brush fire hazard area, hillside, or area with inadequate fire hydrant service or street access.

However, the Project Site is located in a relatively flat, 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.

As also indicated in the *Thresholds Guide*, the Project could result in a significant impact if the following is true:

- 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 *Thresholds Guide* determines that a Project would have a less than significant impact if:

- 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.

According to the *Thresholds Guide*, a significant impact could also result if:

- 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 Drive 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 proposed 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 public and private fire hydrants shall be required.
- Any person owning or having control of any facility, structure, group of structures, or premises shall provide 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 lane 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.

Police Services – The Project Site is located in the Los Angeles Police Department's (the "LAPD") 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 square feet of floor area for medical uses) beyond the 700,000 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 mitigation measures are:

- Elevators, lobbies, and parking areas should be well illuminated and designed with minimum dead space to eliminate areas 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 that 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 Campus.

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.

The proposed Project would have a less than significant effect on police services during the construction phase, and further analysis is not warranted.

Schools - 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.

The *Thresholds Guide* screening criteria for schools 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 square feet of floor area for medical uses) beyond the 700,000 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.

Parks and Other Public Facilities – 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 parks and other public facilities 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 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.

Parks and Recreation

The Project will not:

- 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.
- Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

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.

The Project would not create additional demand for recreational facilities or does not include or require the construction of recreational facilities. Therefore, the Project is not anticipated to result in significant impacts to recreational facilities 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 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.

Traffic, Transportation and Access (Air Traffic)

The Project will not:

- 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?

Air Traffic – The Project Site is not located within an airport land use plan or 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. Therefore, the Project is not anticipated to result in significant impacts to air traffic patterns and would not require further evaluation of this issue.

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.

The potential significance of the Project's impacts related to other traffic, transportation and access issues, is addressed in *Section IV: Environmental Impact Analysis: D- Traffic, Circulation and Access*.

Utilities

The Project will not:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.
- Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- 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.
- Have insufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlements needed.
- Result in a determination by the wastewater treatment provider which serves or may serve the proposed Project that it does not have adequate capacity to serve the Proposed Project's projected demand in addition to the provider's existing commitments.
- Be served by a landfill without sufficient permitted capacity to accommodate the project's solid waste disposal needs

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.

Water/Wastewater (Sanitary Sewers) - Water is currently supplied to the Project Site by the Los Angeles Department of Water and Power (the "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/build out.

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[3] per day over the Master Plan projected levels. The established zoning of [T][Q]C2-2D-O supports the use and density of the Project. Several mitigation measures pertaining to water usage (and sewage generation) 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.

[3] 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.

- 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 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. These requirements were incorporated into the City's proposed Green Building Ordinance adopted 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.[4] 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.

Wastewater from the Project Site is currently treated at the Hyperion Treatment Plant (the "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; the Project would produce an increase of more than 4,000 gallons per day; and the Project would not include a change in the land use limitations, which would allow greater average daily flows.

[4] 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.

The Project would result in a net increase of 50,000 gallons[5] 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.

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 no further evaluation is required .

Solid Waste - 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 Angeles 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[6] per day or 4.9 tons per week over the projected Master Plan levels. 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.

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.

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.

[5] 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.
[6] Seven pounds/1000 square feet. Source: City of Los Angeles Bureau of Engineering, April, 1981.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

B. SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126(b) requires that an EIR discuss significant environmental effects that cannot be avoided if the proposed project is implemented. Based upon the analysis in *Section IV: Environmental Impact Analysis*, with implementation of mitigation measures, the Project will not result in a significant environmental effect with regard to the issues analyzed herein, except for significant unavoidable impacts related to:

- Construction (short-term) air quality impacts related to NO_X, PM_{10} and $PM_{2.5}$
- Construction (short-term) noise impacts at sensitive receptors

Pursuant to CEQA Guidelines Sections 15092 and 15093, and in the event the Project is approved, the City of Los Angeles must adopt a Statement of Overriding Considerations acknowledging these outstanding significant adverse impacts and stating the reason(s) for accepting these impacts in light of the whole environmental record as weighed against the benefits of the Project.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

C. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126(c) requires that an EIR discuss irreversible environmental changes due to the proposed Project. Irreversible environmental changes will not occur as a result of Project implementation. The Project Site has been committed to urban use for many years, and as a medical center since at least 1955. The Project uses are consistent with City planned land uses for the Project Site and the existing uses within the project area. Thus, development of the Project Site is not considered a new commitment to urban development and does not represent the conversion of undeveloped land.

Construction of the Project will require the consumption of natural resources and renewable and nonrenewable materials, including building materials (e.g., wood and metal) and fossil fuels (e.g., gasoline, diesel fuel, and natural gas). Once operational, the Project uses will require consumption of natural resources and renewable and non-renewable materials such as electricity, natural gas, potable water, and fossil fuels for Project-generated vehicle trips. The commitment of resources associated with the Project is consistent with planned future development within the City of Los Angeles. Moreover, the use of resources represents a very small percentage of the resources to be utilized by development City-wide.

Additionally, the Project provides public benefits through expansion of medical services and research. There is no particular justification for avoiding or delaying the continued commitment of these resources.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

D. GROWTH-INDUCING IMPACTS

How the Proposed Project Could Foster Growth

Section 15126(d) of the CEQA Guidelines requires that an EIR "discuss the growth inducing impact of the proposed Project, including ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment."

The Project is not expected to generate growth in the area beyond the intensification of the Project Site. Development of the 460,650 square foot West Tower, which will contain 90,000 square feet from the Existing Building that will be demolished, 170,650 square feet remaining under the approved and vested Master Plan, and 200,000 square feet under the Project, will result in an increase in short-term construction and long-term employment opportunities. The City of Los Angeles and surrounding areas include a large employee base; however, new jobs at the Project Site would offer employment opportunities to workers who may already reside close to or within the Wilshire Community Plan area.

The Project Site is readily accessible from area freeways, local roadways and mass transit (buses). CSMC employees come from a variety of locations throughout Los Angeles, Orange and Ventura Counties.

It is not expected that any significant number of employees will move to the area specifically because of the Project. No significant growth inducing impact would occur. Short-term construction jobs are not anticipated to induce unanticipated new population growth, because the construction process is temporary and those jobs would end once development is completed.

It is anticipated that the Project will be adequately serviced by existing extensions of the electrical, water, sewer and natural gas utility systems existing on or near the Project Site. No additional infrastructure of this nature would be constructed that could generate additional population growth in the project area.

Construction of the Project will create short-term construction jobs, as well as permanent jobs associated with the increase in medical services and research. Surrounding land uses and businesses may experience secondary effects through stimulated economic activity and growth due to an increased need for commercial support services in the general vicinity of the Project Site due to the incremental increase in the number of employees and patrons at the CSMC Campus. Although the Project would directly provide employment growth at the Project Site, and indirectly stimulate economic growth in the surrounding area, such growth is not outside the scope of what has been anticipated and planned for in the Community Plan area. Thus, no significant growth inducing impacts are anticipated.

Cumulative Development Impacts

The related projects (see *Section III: General Description of the Environmental Setting*) are primarily infill projects that will similarly add to the physical and economic revitalization of the Wilshire and West Los Angeles area. Cumulative impacts relating to each environmental issue discussed in this SEIR are addressed under the individual impact analysis sections (see *Section IV: Environmental Impact Analysis*). The City will require the preparation of an EIR for those related projects that the City anticipates will have potentially significant environmental impacts. Those EIRs must similarly discuss cumulative impacts and growth inducing effects. Individual project mitigation measures may be required in order to reduce environmental impacts. The Project and the related projects are not expected to generate unwanted or unplanned growth inducing effects. On the contrary, the City's General Plan Framework favors infill development, and the continued development of vital, Regional and/or Community Centers such as the project area to provide for high-intensity centers, consistent with the preservation and protection of low-density, single-family residential areas from encroachment by other types of uses. Such land use arrangements are generally considered to have less of an effect on the environment by preserving unplanned or premature lands from development on the urban fringe or in more remote and rural locations.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

E. MITIGATION MONITORING PROGRAM

A Mitigation Monitoring Program ("MMP") has been prepared in accordance with Public Resources Code Section 21081.6, which requires a Lead or Responsible Agency that approves or carries out a project where an EIR has identified significant environmental effects to adopt a "reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment." The City of Los Angeles is the Lead Agency for the Project.

The function and format of the MMP are described here, and a copy of the Draft MMP is provided in *Appendix G: Mitigation Monitoring Program* of this SEIR. A Final MMP will be adopted at the conclusion of the SEIR process and will reflect the final set of required mitigation measures to address Project impacts.

The MMP is designed to monitor implementation of all feasible mitigation measures as identified in the SEIR for the Project. In the Draft MMP, mitigation measures are listed and numbered consistent with the relevant section numbering provided in the Draft SEIR. Each mitigation measure is listed and categorized by topic with an accompanying discussion of the following:

- The phase of the Project during which the mitigation measure should be monitored (i.e., prior to issuance of a building permit, construction, or occupancy);

- The enforcing agency (i.e., the agency with the authority to enforce the mitigation measure); and

- The monitoring agency (i.e., the agency which monitors compliance and implementation of the required mitigation measure).

The Project Applicant shall be obligated to provide certification prior to the issuance of site or building plans (or an appropriate subsequent stage) that compliance with the required mitigation measures has been achieved. All departments listed in the MMP are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all mitigation measures shall be the Project Applicant unless otherwise noted.

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VIII. REFERENCES

American Society for Testing of Materials (ASTM). 2003. *Standard Classification for Determination of Outdoor-Indoor Transmission Class*. West Conshohocken, PA: Author.

California Air Resources Board (CARB). 2007. *2006 State Area Designations*. 25 June 2008 <http://www.arb.ca.gov/desig/adm/adm.htm>.

California Air Resources Board (CARB). 2007. *Proposed Early Actions to Mitigate Climate Change in California*. 25 June 2008 <http://www.climatechange.ca.gov/climate_action_team/reports/2007-04-20_CAT_REPORT.PDF>.

California Air Resources Board (CARB). 2007. *Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration*. 25 June 2008 <http://www.arb.ca.gov/cc/ccea/meetings/ea_final_report.pdf>

California Climate Action Registry. 2008 (April). *California Climate Action Registry General Reporting Protocol Version 3.0*. 25 June 2008 <http://www.climateregistry.org/resources/docs/protocols/grp/GRP_V3_April2008_FINAL.pdf>.

California Department of Transportation (Caltrans), Environmental Program. 1998. *Technical Noise Supplement*. Sacramento, CA: Author. 25 June 2008 <http://www.dot.ca.gov/hq/env/noise/index.htm>.

California Department of Transportation (Caltrans), Environmental Program. 2006. *Guidance for Preparers of Growth-related, Indirect Impact Analyses*. 7 June 2008 <http://www.dot.ca.gov/ser/Growth-related_IndirectImpactAnalysis/GRI_guidance06May_files/gri_guidance.pdf>

California Energy Commission. 2006 (December). *Inventory of Greenhouse Gas Emissions and Sinks: 1990 to 2004*. 25 June 2008 <http://www.energy.ca.gov/2006publications/CEC-600-2006-013/CEC-600-2006-013-SF.PDF>.

California Energy Commission. 2005. *2005 Building Energy Efficiency Standards Nonresidential Compliance Manual*. 19 May 2008 <http://www.energy.ca.gov/title24/2005standards/nonresidential_manual.html>.

California Governor's Office of Planning and Research (OPR). 2007 (as amended). *California Environmental Quality Act: Guidelines*. 1 May 2008 <http://ceres.ca.gov/ceqa/guidelines/>.

California Office of Statewide Healthcare Planning and Development (OSHPD). 2008. *Beds Lost/Gained in Los Angeles County Between 1995 and 2006*. Sacramento, CA: Author.

California Office of the Governor. 2005 (June). Executive Order S-3-05. 28 May 2008 <http://governor.ca.gov/state/govsite/gov_htmldisplay.jsp?BV_SessionID=@@@@1909556881.1213669701@@@@&BV_EngineID=ccccadeeghfkgjecfngcfkmdffidfnf.0&sCatTitle=Exec+Order&sFilePath=/govsite/executive_orders/20050601_S-3-05.html&sTitle=Executive+Order+S-3-05&iOID=69591>.

California Office of the Governor. 2004 (December). Executive Order S-20-04. 28 May 2008 <http://governor.ca.gov/state/govsite/gov_htmldisplay.jsp?BV_SessionID=@@@@1909556881.1213669701@@@@&BV_EngineID=ccccadeeghfkgjecfngcfkmdffidfnf.0&sCatTitle=Exec+Order&sFilePath=/govsite/executive_orders/20041214_S-20-04.html&sTitle=Executive+Order+S-20-04&iOID=60045>.

California, State of. 2006 (as amended). *California Code of Regulation*. 2 May 2008 <http://www.oal.ca.gov/ccr.htm>.

California, State of. 2006 (as amended). *California Government Code* (Section 65962.5). 4 May 2008 <http://www.leginfo.ca.gov/calaw.html>.

California, State of. 2006 (as amended). *California Health and Safety Code (HSC)* (Section 38561(e)). 2 May 2008 <http://www.leginfo.ca.gov/calaw.html>.

California, State of. 2006 (as amended). *California Public Resources Code* (Sections 21000-21177 and 25402). 2 May 2008 <http://www.leginfo.ca.gov/calaw.html>.

California State Legislature. 2007. Senate Bill 97 (SB 97). Dutton. 25 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=sb_97&sess=CUR&house=B&author=dutton>.

California State Legislature. 2006. Assembly Bill 32 (AB 32), Global Warming Solutions Act of 2006. Nunez. 25 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=ab_32&sess=PREV&house=B&author=nunez>.

California State Legislature. 2006. Assembly Bill 140 (AB 140), Disaster Preparedness and Flood Prevention Bond Act of 2006. Nunez. 25 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=ab_140&sess=PREV&house=B&author=nunez>.

California State Legislature. 2006. Senate Bill 1266 (SB 1266), Highway Safety, Traffic Reduction, Air Quality and Port Security Bond Act of 2006. Perata. 25 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=sb_1266&sess=PREV&house=B&author=perata>.

California State Legislature. 2006. Senate Bill 1368 (SB 1368). Perata. 25 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=sb_1368&sess=PREV&house=B&author=perata>.

California State Legislature. 2002. Assembly Bill 1493 (AB 1493), Pavley. 25 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=ab_1493&sess=0102&house=B&author=pavley>.

California State Legislature. 1994. Senate Bill 1953 (SB 1953), Hospital Facilities Seismic Safety Act. Alquist. 4 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=sb_1953&sess=9394&house=B&author=senator_alquist>.

California State Legislature. 1989. Assembly Bill 939 (AB 939), California Integrated Waste Management Act of 1989.

California State Legislature. 1988. Assembly Bill 2595 (AB 2595), California Clean Air Act of 1988. Sher. 26 June 2008 <http://www.arb.ca.gov/bluebook/bb06/HEA[14]/HEA_[14].htm>.

California State Legislature. 1983. Assembly Bill 1807 (AB 1807), Toxic Air Contaminant Identification and Control Act of 1983. Tanner.

California State Legislature. 1976. Senate Bill 151 (SB 151), Lewis-Presley Air Quality Management Act. 27 June 2008 < http://www.leginfo.ca.gov/cgi-bin/calawquery?codesection=hsc&codebody=&hits=20>.

California Stormwater Quality Association. 2003. *California Stormwater Best Management Practice Handbook-Construction*. Sacramento, CA: Author. 25 June 2008 <http://www.cabmphandbooks.com/Construction.asp>.

Cousineau, Michael R. *Healthcare Summit* (Presentation to the Hospital Association of Southern California (HASC)). University of Southern California - Center for Community Health Studies, Los Angeles, CA. June 2008. [Presenter referenced from the Los Angeles County Department of Public Health]

Finlayson-Pitts, Barbara J., and James N. Pitts, Jr. (1999). *Chemistry of the Upper and Lower Atmosphere*. Burlington, MA: Academic Press.

Garza, Vincente J., Peter Graney, Daniel Sperling. 1996 (May). *Transportation Project-Level Carbon Monoxide Protocol* [Research Report UCD-ITS-RR-96-01]. Davis, CA: Institute of Transportation Studies, University of California, Davis. 25 June 2008 <http://pubs.its.ucdavis.edu/publication_detail.php?id=595>.

Green Car Congress. 2007. *EPA Concludes Public Hearings on California Waiver for New Vehicle CO2 Regulations*. 28 May 2008 <http://www.greencarcongress.com/2007/05/epa_concludes_p.html>.

Health Care Without Harm. 2002. *Toolkit 7, Alternatives to Medical Waste Incineration: Stopping the Toxic Threat*. 1 July 2008 <http://www.noharm.org/details.cfm?type=document&id=630>

Institute of Transportation Engineers (ITE). 2003. *Trip Generation, 7th Edition*. Washington D.C.: Author. 25 June 2008 <http://www.ite.org/emodules/scriptcontent/Orders/ProductDetail.cfm?pc=GP-001B>.

Law/Crandall, Inc. 1991. *Report of Geotechnical Evaluation for Environmental Impact, Cedars-Sinai Medical Center Plan*. Los Angeles, CA: Author.

Linscott, Law & Greenspan, Engineers. 2008. *Cedars-Sinai Medical Center Project Neighborhood Street Segment Analysis*, memorandum to Planning Associates, Inc. Pasadena, CA: Author.

Linscott, Law & Greenspan, Engineers. 2008. *Traffic Impact Study Cedars-Sinai Medical Center Project*. Pasadena, CA: Author.

Los Angeles, City of. 2007. *City of Los Angeles Ordinance No. 178,866*. 16 June 2008 <http://clkrep.lacity.org/councilfiles/07-0692_ord_178866.pdf>.

Los Angeles, City of. 2007. *Green LA An Action Plan to Lead the Nation in Fighting Global Warming*. 19 May 2008 <http://www.lacity.org/ead/EADWeb-AQD/GreenLA_CAP_2007.pdf>.

Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 16 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.

Los Angeles, City of. 2006 (May). *L.A. CEQA Thresholds Guide*. Los Angeles, CA: Author. 25 June 2008 <http://www.lacity.org/ead/EADWeb-AQD/thresholdsguide.htm>.

Los Angeles, City of. 2001. *Wilshire Community Plan*. 19 May 2008 <http://cityplanning.lacity.org/complan/pdf/wilcptxt.pdf>.

Los Angeles, City of. 1995. *The Citywide General Plan Framework An Element of the City of Los Angeles General Plan*. Agoura Hills, CA: Envicom Corporation. 19 May 2008 <http://cityplanning.lacity.org/>.

Los Angeles, City of. 1993. *City of Los Angeles Ordinance No. 168,847*. 16 June 2008 <http://clkrep.lacity.org/councilfiles/88-0046_ORD_168847_07-31-1993.pdf>.

Los Angeles, City of. 1993. *City of Los Angeles Ordinance No. 168,848*. 16 June 2008 <http://clkrep.lacity.org/councilfiles/88-0046-S1_ORD_168848_07-31-1993.pdf>.

Los Angeles, City of. 1993. *Development Agreement Between The City of Los Angeles and Cedars-Sinai Medical Center*. Los Angeles, CA: City of Los Angeles.

Los Angeles, City of. 1992. *Draft Environmental Impact Report Cedars-Sinai Medical Center Master Plan*, EIR No. 90-0643(ZC)(HD). Los Angeles, CA: Author.

Los Angeles, City of. 1992. *Final Environmental Impact Report Cedars-Sinai Medical Center Master Plan*, EIR No. 90-0643(ZC)(HD). Los Angeles, CA: Author.

Los Angeles, City of. 1988. *City of Los Angeles Ordinance No. 163,617*. 19 May 2008 <http://clkrep.lacity.org/councilfiles/84-1515_ORD_163617_06-21-1988.pdf>.

Los Angeles, City of. 1973. *City of Los Angeles Noise Regulation, Ordinance No. 144,331*.

Los Angeles County Metropolitan Transportation Authority (Metro). 2004. *Congestion Management Program for Los Angeles County*. Los Angeles, CA: Los Angeles County Metropolitan Transportation Authority. 16 June 2008 <http://www.metro.net/projects_programs/cmp.htm>.

Los Angeles Department of Building and Safety. 2008 (as amended). *Los Angeles Building Code*. 4 June 2008 <http://www.ladbs.org/permits/codes.htm>.

Los Angeles Department of City Planning. 1995. *Los Angeles Citywide General Plan Framework Draft Environmental Impact Report*. Los Angeles, CA: Author.

Los Angeles Department of City Planning. 1995. *Noise Element of the Los Angeles City General Plan*. Los Angeles, CA: Author. 16 June 2008 <http://cityplanning.lacity.org/cwd/gnlpln/noiseElt.pdf>.

Los Angeles Department of Public Works. 1999. *Standard Street Dimensions Standard Plan S-470-0*. 25 May 2008 <http://eng.lacity.org/techdocs/stdplans/s-400.htm>.

Los Angeles Department of Transportation (LADOT). 2002. *Traffic Study Policies and Procedures*. Los Angeles, CA: Author. 16 June 2008 <http://www.lacity.org/LADOT/TrafficStudyGuidelines.pdf>.

Los Angeles Department of Transportatin (LADOT). 2008. *Traffic Impact Study for the Proposed Cedars-Sinai Medical Center (CSMC) Project Located on CSMC Campus (ENV-2008-620-EIR)*, inter-departmental correspondence to City Planning Department. Los Angeles, CA: Author.

Los Angeles Department of Water and Power (LADWP). 2008 (March 8). Letter Re: *Request for Increased Water Conservation Measures in New Construction*. Letter to Ms. S. Gail Goldberg, Director of City Planning from H. David Nahai, Chief Executive Officer and General Manager, Department of Water and Power.

Los Angeles Department of Water and Power (LADWP). 2005. *2005 Urban Water Management Plan*. 19 May 2008 <http://www.ladwp.com/ladwp/cms/ladwp007157.pdf>.

Los Angeles Police Department, COMPSTAT Unit. 2008. *COMPSTAT Wilshire Area Profile 04/06/08 – 05/03/08*. 6 May 2008 <http://www.lapdonline.org/assets/pdf/wilprof.pdf>.

Los Angeles Police Department. 2005 – 2008. *PACMIS Report #10, Selected Crimes and Attempts by Reporting District.* Los Angeles, CA: Author.

South Coast Air Quality Management District (SCAQMD). 2008. *AQMD Meteorological Data Dispersal Model Application*. 25 June 2008 <http://www.aqmd.gov/smog/metdata/ MeteorologicalData.html>.

South Coast Air Quality Management District (SCAQMD). 2007. *Final 2007 Air Quality Management Plan*. 19 May 2008 <http://www.aqmd.gov/aqmp/07aqmp/index.html>.

South Coast Air Quality Management District (SCAQMD). 2007. *Final Socioeconomic Report for the 2007 AQMP*. Page C-1. 30 July 2008 <http://www.aqmd.gov/aqmp/07aqmp/07aqmp_socio.html>

South Coast Air Quality Management District (SCAQMD). 2006 (October). *Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds*. Diamond Bar, CA: Author. 16 June 2008 <http://www.aqmd.gov/CEQA/handbook/PM2_5/finalmeth.doc>.

South Coast Air Quality Management District (SCAQMD). 2005. *AQMD Rule Book*. IV. Prohibitions (Rule 403). 19 May 2008 <http://www.aqmd.gov/rules/rulesreg.html>.

South Coast Air Quality Management District (SCAQMD). 2005 (January). *Sample Construction Scenarios for Projects Less than Five Acres in Size*. 19 May 2008 <http://www.aqmd.gov/ceqa/ handbook/LST/FinalReport.pdf>.

South Coast Air Quality Management District (SCAQMD). 2003 (June). *Final Localized Significance Threshold Methodology*. 19 May 2008 <http://www.aqmd.gov/CEQA/handbook/LST/ LST.html>.

South Coast Air Quality Management District (SCAQMD). 2003 (August). *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. 16 June 2008 <http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc>.

South Coast Air Quality Management District (SCAQMD). 2000. *An Air Toxics Control Plan for the Next Ten Years*. 19 May 2008 <http://www.aqmd.gov/aqmp/AirToxicsControlPlan.html>.

South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook*. Diamond Bar: Author. 6 June 2008 <http://www.aqmd.gov/ceqa/oldhdbk.html>.

South Coast Air Quality Management District (SCAQMD). 1976. *AQMD Rule Book*. IV. Prohibitions (Rule 402). 19 May 2008 <http://www.aqmd.gov/rules/rulesreg.html>.

Southern California Association of Governments (SCAG). 2004. *2004 Regional Transportation Plan: Destination 2030.* 1 December 2007 <http://www.scag.ca.gov/rtp2004/2004/FinalPlan.htm>.

Southern California Association of Governments (SCAG). 2001. *Employment Density Study Summary Report*. 28 May 2008 <http://www.scag.ca.gov/forecast/downloads/employ_den.pdf>.

Terry A. Hayes Associates, LLC. 2008. *Air Quality and Noise Analysis for the Proposed Cedars-Sinai Medical Center West Tower Project Alternatives* memorandum to Planning Associates Inc. Culver City, CA: Author.

Terry A. Hayes Associates, LLC. 2008. *Cedars-Sinai Medical Center Project Air Quality and Noise Impact Report.* Culver City, CA: Author.

U.S. Congress, 101st Congress. 1990 (as amended). *U.S. Code* (Title 42, Chapter 85). Federal Clean Air Act of 1990. 16 June 2008 <http://www.epa.gov/air/caa/>.

U.S. Department of Transportation, Federal Railroad Administration. 2005 (October). *High-Speed Ground Transportation Noise and Vibration Impact Assessment*. Washington D.C.: Parsons Transportation Group. 16 June 2008 <http://www.fra.dot.gov/downloads/RRDev/nvman.pdf >.

U.S. Department of Transportation, Federal Transit Administration. 1995 1st edition; 2006 2nd edition. *Transit Noise and Vibration Impact Assessment*. Washington D.C.: Author. 16 June 2008 <http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf>.

Western Regional Climate Center. 2007. *Western Regional Climate Center*. 26 June 2008 <http://www.wrcc.dri.edu/>.