The following provides a summary of the proposed Project description, environmental impacts and mitigation measures from the Draft SEIR. This summary uses the *Executive Summary* as contained in the Draft SEIR as its basis. Changes resulting from the modifications of the proposed Project since circulation of the Draft SEIR are shown in underline with deletions shown in ~~strikeout~~ mode.

II. ~~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:

Lead Agency: City of Los Angeles
Department of City Planning
Environmental Review Section
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Attention: Adam Villani

Owner/Applicant: Cedars-Sinai Medical Center
8720 Beverly Boulevard
Los Angeles, CA 90048
Attention: Larry Colvin

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~~ the Draft SEIR. The Project is an amendment to the previously approved Master Plan development analyzed in the Original 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 the 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 (refer to *Table 1: Summary of Master Plan Development Completed Through 2008* on page 19 of the Draft SEIR). 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. The parking structure will be approximately 35 feet high. 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

[1] Pursuant to LAMC 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).

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~~ the 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~~ the Draft SEIR.

II. ~~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~~ the 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* of the Draft SEIR. 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* of the Draft SEIR.

II. ~~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~~ the 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~~ the 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.

II. ~~EXECUTIVE~~ SUMMARY

D. SUMMARY OF PROJECT IMPACTS

Section IV: Environmental Analysis of ~~this~~ the 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~~ the 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~~ the 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~~ the 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, many 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~~ the 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~~ the 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~~ the 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. During this approval process, the Applicant shall coordinate with the Cities of West Hollywood or Beverly Hills, as appropriate, regarding the proposed haul route, if the route is proposed to utilize streets in either city.

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 (which is located just north of the Project Site within the City of West Hollywood) 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 ("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. During this approval process, the Applicant shall coordinate with the Cities of West Hollywood or Beverly Hills, as appropriate, regarding the proposed haul route, if the route is proposed to utilize streets in either city.

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 the 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. A flag person(s) shall be required at the construction site to monitor and assist the ingress and egress of trucks from the site and ensure compliance with the approved haul route. The location of the flag person(s) and warning signs shall be set forth in the TCP.

MM TRF-24: **Int. No. 2: Robertson Blvd./Alden Dr.-Gracie Allen Dr.** The applicant shall 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.** The applicant shall 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 and 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.

The Original EIR (pages 104-114) identified a total of 1,206,490 jobs and 908,742 housing units within a 30-minute commute radius of the Project Site and indicated that this would be considered a relatively balanced relationship between jobs and housing and, thus, impacts would not be anticipated for a project that is not considered regionally significant. CEQA Guidelines Section 15206, which establishes criteria for identifying potential regionally significant projects, indicates that projects with less than 500,000 new square feet of commercial use or employment of fewer than 1,000 new employees are not considered regionally significant. As discussed in *Section VI.A: Effects Not Found to Be Significant* of the Draft SEIR, population, housing and employment issues for the Project were determined to be less than significant and changes to local and regional population due to the Project would not affect housing and employment significantly from those conditions that were previously identified and evaluated in the Original EIR.

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.

II. 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~~ the Draft SEIR, and a ~~draft MMP is included in *Appendix G: Mitigation Monitoring Program.*~~ final MMP is included in Section V of this Final SEIR.