IV. COMMENT LETTERS AND RESPONSES TO COMMENTS

The City of Los Angeles, Department of City Planning received a total of ten written letters that provided comments on the Draft SEIR during the designated public comment period (between September 11, 2008 and October 27, 2008). Comment letters were received from the following:

Federal and State Agencies

None.

Regional, County, and Local Agencies

1.	City of Los Angeles Bureau of Sanitation, Wastewater Engineering Services Division	September 30, 2008
2.	City of Los Angeles Bureau of Sanitation, Wastewater Engineering Services Division	October 9, 2008
3.	City of Los Angeles Bureau of Sanitation, Wastewater Engineering Services Division	October 16, 2008
4.	City of West Hollywood	October 27, 2008
5.	City of Beverly Hills	October 27, 2008
6.	Los Angeles County Metropolitan Transportation Authority (Metro)	October 24, 2008

Organizations and Special Interest Groups

7.	Edward J. Casey, Alston & Byrd, LLP (representing The Decurion Corporation)	October 27, 2008
8.	Laura Lake, Lake & Lake Consulting, Inc. (representing Burton Way Foundation)	October 18, 2008
9.	Robert H. Schwab, Robertson Community Association	October 10, 2008

Individuals and Businesses

10.	Jerry Singer	November 4, 2008

Each comment letter has been included in its entirety in this section, and is followed by responses to the comments in each respective letter. Each comment letter has been assigned a corresponding identification number, and comments within each comment letter are given a comment number. For example, comment letter "1" is from the City of Los Angeles Bureau of Sanitation, and contains comments 1-1 through 1-2.

Written comments made during the public review for the Draft SEIR intermixed points and opinions relevant to the Project approval/disapproval with points and opinions relevant to the environmental review presented in the Draft SEIR. Section 15204(a) of the CEQA Guidelines encourages reviewers to examine the sufficiency of the environmental document, particularly in regard to significant effects, and to suggest specific mitigation measures and project alternatives. Based on judicial interpretation of this section, the Lead Agency is not obligated to undertake every suggestion given it, provided that the Lead Agency responds to significant environmental issues and makes a good faith effort at disclosure. Furthermore, Section 15204(c) of the CEQA Guidelines advises reviewers that comments should be accompanied by factual support. This section of the Final SEIR provides detailed responses to all comments related to the environmental review and discusses as appropriate the points raised by commentors regarding Project design and opinions relating to Project approval. The latter are usually statements of opinion or preference regarding a project's design or its presence as opposed to points within the purview of an EIR: environmental impact and mitigation.

COMMENT LETTER #1

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

File: SC.CE.

DATE: September 30, 2008

TO: Adam Villani
Environmental Review Coordinator
Department of City Planning

RECEIVED
CITY OF LOS ANGELES
OCT 08 2008
ENVIRONMENTAL UNIT

FROM: Brent Lorscheider, Acting Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation

SUBJECT: **Cedars-Sinai Medical Center – West Tower Project – Notice of Completion Draft EIR**

This is in response to your September 11, 2008 letter requesting wastewater service information for the proposed project. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD), has conducted a preliminary evaluation of the potential impacts to the wastewater system for the proposed project. 1

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Existing			
Medical Building	250 GPD/1000 SQ.FT	90,000 SQ.FT	(22,500)
Parking	20 GPD/1000 SQ.FT	79,080 SQ.FT	(1,581)
Proposed			
Medical Use	250 GPD/1000 SQ.FT	460,650 SQ.FT	115,164
Parking	20 GPD/1000 SQ.FT	280,798 SQ.FT	5,616
Total			**96,699**

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes the existing 8-inch line on W Beverly Blvd. The sewage from the existing 8-inch line flows into a 15-inch, then 18-inch line on Beverly Pl, then continues into a 21-inch line on La Cienega Blvd. The sewage travels down S San Vicente Blvd into a 33-inch line on Schumacher Dr before discharging into a 42-inch line on S La Cienega Blvd. The current flow level (d/D) in the 15-inch line cannot be determined at this time as gauging is needed. Based on our existing gauging information, the current flow level (d/D) in the 18-inch, 21-inch, and 42-inch line is approximately 47%, 52%, and 34% full, respectively. The design capacities at d/D of 50% for the 18-inch line are 3.02 million Gallons per Day (GPD) and for the 42-inch line is 17.1 million GPD.

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COMMENT LETTER #1
CONTINUED

The estimated flow that would be generated from your proposed project exceeds 20,000 GPD and therefore may have a significant impact on the sewer system capacity. Thus, detailed gauging is necessary to determine whether the sewer system is capable of safely accommodating the total flow for your proposed project. We have initiated a work order to gauge the designated critical locations in the project area. This process usually takes approximately three (3) to four (4) weeks. A detailed evaluation and response will be provided to you within one (1) to two (2) weeks upon receipt of gauging data. If this schedule is not acceptable, please call us to discuss options. **2**

If you have any questions, please call Abdul Danishwar of my staff at (323) 342-6220.

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IV. COMMENT LETTERS AND RESPONSES TO COMMENTS

A. COMMENT LETTER NO. 1

Brent Lorscheider, Acting Division Manager
City of Los Angeles
Bureau of Sanitation
Wastewater Engineering Services Division
September 30, 2008

Response 1-1

This comment is a standard letter distributed by the Bureau of Sanitation to all projects analyzed in an EIR. The commentor states that they have conducted a preliminary evaluation of the potential impacts to the wastewater system for the proposed Project and identified anticipated sewage generation flows and sewer availability to serve the Project. This information is noted and has been incorporated on pages 324 and 325 of the Draft SEIR (see Correction and Addition III.D.2 of this Final SEIR).

Response 1-2

This comment is a standard letter distributed by the Bureau of Sanitation to all projects analyzed in an EIR. The commentor concludes that area-specific gauging studies have not been completed. Because the proposed Project is estimated to exceed a sewage generation flow of 20,000 gallons per day (GPD), however, the impact to the sewer system capacity could be significant. Subsequent information received from the commentor (see Comment Letters 2 and 3) confirms that, through the completion of the gauging studies, adequate capacity at the Hyperion Treatment Plant has been confirmed and the impact to sewer system capacity would be less than significant (see Response 2-2). This conclusion is consistent with the previous conclusions regarding sewer service in the Draft SEIR (page 325).

COMMENT LETTER #2

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

File: SC.CE.

DATE: October 9, 2008

TO: Adam Villani
Environmental Review Coordinator
Department of City Planning

FROM: Brent Lorscheider, Acting Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation

SUBJECT: **Cedars-Sinai Medical Center – West Tower Project – Notice of Completion Draft EIR**

This is in response to your September 11, 2008 letter requesting wastewater service information for the proposed project. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD), has conducted a preliminary evaluation of the potential impacts to the wastewater system for the proposed project. 1

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Existing			
Medical Building	250 GPD/1000 SQ.FT	90,000 SQ.FT	(22,500)
Parking	20 GPD/1000 SQ.FT	79,080 SQ.FT	(1,581)
Proposed			
Medical Use	250 GPD/1000 SQ.FT	460,650 SQ.FT	115,164
Parking	20 GPD/1000 SQ.FT	280,798 SQ.FT	5,616
Total			**96,699**

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes the existing 8-inch line on W Beverly Blvd. The sewage from the existing 8-inch line flows into a 15-inch and then an 18-inch line on Beverly Pl then continues into a 21-inch line on La Cienega Blvd. The sewage travels down on S San Vicente Blvd into a 33-inch line on Schumacher Dr before discharging into a 42-inch line on S La Cienega Blvd.

Since our last response on October 1, 2008 detailed gauging data has been obtained. Based on our gauging information, the current flow level (d/D) in the sewer system is as follows: 15-inch line is approximately 45% full. The existing 8-inch line is a terminal line and

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COMMENT LETTER #2
CONTINUED

is therefore assumed to have available capacity.

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation may be needed as part of the permit process to identify a sewer connection point. If the local sewer line, the 8-inch lines, to the 21-inch sewer line, has insufficient capacity then the developer will be required to build a secondary line to the nearest larger sewer line with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project. **2**

If you have any questions, please call Abdul Danishwar of my staff at (323) 342-6220.

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IV. COMMENT LETTERS AND RESPONSES TO COMMENTS

B. COMMENT LETTER NO. 2

Brent Lorscheider, Acting Division Manager
City of Los Angeles
Bureau of Sanitation
Wastewater Engineering Services Division
October 9, 2008

Response 2-1

See Response 1-1.

Response 2-2

This comment is a standard letter distributed by the Bureau of Sanitation to all projects analyzed in an EIR. The commentor states that, based on the result of recently completed gauging studies, the City has confirmed that adequate sewer system capacity at the Hyperion Treatment Plant is available to serve the Project and impacts to sewer service would be less than significant. This conclusion is consistent with conclusions previously reached regarding sewer service as presented in the Draft SEIR (page 325). The commentor notes that the Applicant is required to coordinate with the City during the permit process to identify an appropriate sewer connection point. It is further noted that, consistent with standard City practice, a final approval for sewer capacity and connection permit will be sought at the time building permits are obtained (in approximately Year 2020). Extensions and/or secondary local lines will be established by the Applicant, as necessary, to accommodate Project capacity requirements. The Applicant will coordinate with the City on all final approvals and requirements for the Project during the building permit process.

FORM GEN. 160 (Rev. 6-80)

COMMENT LETTER #3

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

File: SC.CE.

DATE: October 16, 2008

TO: Adam Villani
Environmental Review Coordinator
Department of City Planning

RECEIVED
CITY OF LOS ANGELES
OCT 23 2008
ENVIRONMENTAL UNIT

FROM: Brent Lorscheider, Acting Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation

SUBJECT: **Cedars-Sinai Medical Center – West Tower Project – Notice of Completion Draft EIR**

This is in response to your September 11, 2008 letter requesting wastewater service information for the proposed project. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD), has conducted a preliminary evaluation of the potential impacts to the wastewater system for the proposed project. 1

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Existing			
Medical Building	250 GPD/1000 SQ.FT	90,000 SQ.FT	(22,500)
Parking	20 GPD/1000 SQ.FT	79,080 SQ.FT	(1,581)
Proposed			
Medical Use	250 GPD/1000 SQ.FT	460,650 SQ.FT	115,164
Parking	20 GPD/1000 SQ.FT	280,798 SQ.FT	5,616
Total			**96,699**

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes the existing 8-inch line on W Beverly Blvd. The sewage from the existing 8-inch line flows into a 15-inch and then an 18-inch line on Beverly Pl then continues into a 21-inch line on La Cienega Blvd. The sewage travels down on S San Vicente Blvd into a 33-inch line on Schumacher Dr before discharging into a 42-inch line on S La Cienega Blvd.

Since our last response on October 1, 2008 detailed gauging data has been obtained. Based on our gauging information, the current flow level (d/D) in the sewer system is as follows: 15-inch line is approximately 45% full. The existing 8-inch line is a terminal line and

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COMMENT LETTER #3
CONTINUED

is therefore assumed to have available capacity.

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation may be needed as part of the permit process to identify a sewer connection point. If the local sewer line, the 8-inch lines, to the 21-inch sewer line, has insufficient capacity then the developer will be required to build a secondary line to the nearest larger sewer line with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project. **2**

If you have any questions, please call Abdul Danishwar of my staff at (323) 342-6220.

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IV. COMMENT LETTERS AND RESPONSES TO COMMENTS

C. COMMENT LETTER NO. 3

Brent Lorscheider, Acting Division Manager
City of Los Angeles
Bureau of Sanitation
Wastewater Engineering Services Division
October 16, 2008

NOTE: This comment letter appears to be a duplicate of Comment Letter No. 2, except for a revised date.

Response 3-1

See Response 1-1.

Response 3-2

See Response 2-2.

COMMENT LETTER #4

CITY OF WEST HOLLYWOOD

CITY HALL
8300 SANTA MONICA BLVD.
WEST HOLLYWOOD, CA
90069-6216
(323) 848-6475
FAX: (323) 848-6569

TTY: For hearing impaired
(323) 848-6496

DEPARTMENT
OF COMMUNITY
DEVELOPMENT

VIA INTERNET & U.S. MAIL

October 27, 2008

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

Re: Draft Environmental Impact Report No. ENV-2008-0620-EIR

Dear Mr. Villani:

Thank you for informing us of the proposed new inpatient/medical support facility project at Cedars-Sinai Medical Center. Below are our comments on the Draft EIR.

Transportation & Circulation

1. On Figure 31 (Page 162) of the Draft SEIR, the intersections of Robertson Boulevard/Melrose Avenue and Doheny Drive/Beverly Boulevard, locations within the City of West Hollywood, are identified as "Study Intersections", however there are no level of service analyses conducted for these intersections. Please provide analyses. **1**

2. At a meeting (held March 6, 2008 at the City of West Hollywood) with the applicant and EIR traffic consultant, the City of West Hollywood Transportation Manager requested that a midday peak hour analysis be included for the analyzed intersections located within the City of West Hollywood. The Draft SEIR does not include this analysis, please provide requested midday analysis for the City of West Hollywood locations. **2**

3. In the discussion of CMP monitoring locations on Page 174 of the Draft SEIR, it should be recognized that the intersection of Doheny Drive/Santa Monica Boulevard is a CMP location in the City of West Hollywood. This location is less than one mile from the project site and should be included in the CMP discussion and analysis. **3**

COMMENT LETTER #4
CONTINUED

CITY OF WEST HOLLYWOOD

4. On Page 181 (Item 2 – Intersection Traffic Thresholds) of the Draft SEIR, there are analyzed intersections located in the City of West Hollywood. The City of West Hollywood's significant impact criteria should also be included. The following summarizes the City of West Hollywood significant impact criteria. **4**

Level of Service	Final V/C*	Project Related V/C increase
E and F	0.901 or more	Equal to or greater than 0.020

** Final V/C is the V/C ratio at an intersection, considering impacts from the project, ambient and related project growth, and without proposed traffic impact mitigations.*

5. On Page 184, (Item d – Haul Route Approval) of the Draft SEIR, if haul routes are identified that include streets located within the City of West Hollywood, these haul routes should also be reviewed and approved by the City of West Hollywood Director of Public Works. **5**

6. On Page 212 (Summary of Project Impacts) of the Draft SEIR, discussion should be added that identifies Intersection No. 6 – George Burns Road/Beverly Boulevard as a City of West Hollywood intersection and that the City of West Hollywood's significant impact criteria (mentioned above) was applied. **6**

7. The Draft SEIR Transportation Section (Section D) does not include peak hour traffic volume figures for "Project Only" and "Future with Project" scenarios. **7**

8. The City of West Hollywood approves, in concept, the proposed mitigation measure at the intersection of George Burns Road/Beverly Boulevard. An engineering drawing (in 1"=20' scale) should be submitted to the City of West Hollywood Transportation Division showing the proposed improvements for review and final approval. Also, mitigation for the loss of parking spaces along Beverly Boulevard (needed in order to implement this improvement) needs to be determined. **8**

9. On Pages 237-240 of the Draft SEIR, it should be noted that the City of West Hollywood has not fully signed-off on all of the previous mitigation measures from the original EIR (identified as MN TRF-N/A). **9**

2

COMMENT LETTER #4
CONTINUED

CITY OF WEST HOLLYWOOD

Public Works

10. Groundwater levels range from 7 to 20 feet below grade. Continuous dewatering of ground water would have impacts to adjacent areas that would require monitoring and further evaluation (ref. page 311). **10**

Planning

11. We anticipate that the proposed 11-story building would cast shadows into the City of West Hollywood and possibly across Beverly Boulevard. A Shade and Shadow study should be performed. **11**

Sincerely,

Susan Healy Keene

Susan Healy Keene, AICP
Director, Department of Community Development

3

IV. COMMENT LETTERS AND RESPONSES TO COMMENTS

D. COMMENT LETTER NO. 4

Susan Healy Keene, AICP
Director, Department of Community Development
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069-6219
October 27, 2008

Response 4-1

This comment refers to *Figure 31: Study Intersection Map* provided on page 162 of the Draft SEIR. The map incorrectly identifies the intersections of Robertson Boulevard/Melrose Avenue and Doheny Drive/Beverly Boulevard as study locations. Following consultation with LADOT staff and based on input received during the public scoping process, twenty-two (22) area intersections were designated for evaluation of potential Project-related impacts. The traffic analysis study area was also reviewed and approved by LADOT in the Memorandum of Understanding (MOU) dated February 11, 2008. A copy of the MOU is contained in this Final SEIR as *Appendix F: Memorandum of Understanding and LADOT Approval* to the Traffic Impact Study (Appendix E of the Draft SEIR) (see Correction and Addition III.E.4). However, as requested in this comment, a supplemental analysis of the two intersections (Robertson Boulevard/Melrose Avenue and Doheny Drive/Beverly Boulevard) located in the City of West Hollywood has been prepared for inclusion in the Final SEIR. This supplemental analysis has been prepared based on the City of West Hollywood impact threshold criteria (shown below in *Table A: City of West Hollywood Intersection Impact Threshold Criteria*) for the study intersections during the weekday A.M. peak hour, mid-day peak hour and P.M. peak hour.

TABLE A
CITY OF WEST HOLLYWOOD –INTERSECTION IMPACT THRESHOLD CRITERIA

Final *V/C*	Level of Service	Project Related Increase in *V/C*
>0.901	E or F	equal to or greater than 0.020

The sliding scale method requires mitigation of project traffic impacts whenever traffic generated by the proposed development causes an increase of the analyzed intersection *V/C* ratio by an amount equal to or greater than the values shown above. By comparison, the City of Los Angeles' impact criterion for intersections forecast to operate at LOS E or F (provided in *Table 27: City of Los Angeles Intersection Impact Threshold Criteria* on page 181 of the Draft SEIR) are more strict than the significance thresholds of the City of West Hollywood. Furthermore, the City of West Hollywood significance thresholds do not apply to intersections forecast to operate at LOS D or better (the City of Los Angeles criteria provides significance threshold for intersections forecast to operate at LOS C and D).

At the request of West Hollywood, the West Hollywood intersections of Robertson Boulevard/Melrose Avenue and Doheny Drive/Beverly Boulevard and the four City of West

Hollywood study intersections evaluated in the Draft SEIR and analyzed in the Project traffic study (No. 1: Robertson Boulevard/Beverly Boulevard, No. 6: George Burns Road/Beverly Boulevard, No. 12: San Vicente Boulevard/Melrose Avenue, and No. 13: San Vicente Boulevard/Beverly Boulevard) have been included in this supplemental analysis. *Table B: City of West Hollywood Supplemental Traffic Impact Analysis* shows changes to the *V/C* levels and LOS at the West Hollywood intersections from existing conditions, with and without the proposed Project, in the build-out year of 2023.

TABLE B
CITY OF WEST HOLLYWOOD SUPPLEMENTAL TRAFFIC IMPACT ANALYSIS

NO	INTERSECTION	PEAK HOUR	[1] EXISTING		[2] YEAR 2023 W/ AMBIENT GROWTH		[3] YEAR 2023 W/ RELATED PROJECTS		[4]				[5]			
									YEAR 2023 W/ PROPOSED PROJECT		CHANGE V/C ([4] - [3])	SIGNIF. IMPACT (A)	YEAR 2023 W/ PROJECT MITIGATION		CHANGE V/C ([5] - [3])	MITI-GATED (B)
			V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			V/C	LOS		
1	Robertson Boulevard/ Beverly Boulevard	AM	0.914	E	1.031	F	1.316	F	1.320	F	0.004	NO	1.320	F	0.004	---
		Mid-day	0.696	B	0.781	C	1.181	F	1.188	F	0.007	NO	1.188	F	0.007	---
		PM	0.740	C	0.832	D	1.232	F	1.239	F	0.007	NO	1.239	F	0.007	---
6	George Burns Road/ Beverly Boulevard	AM	0.523	A	0.582	A	0.695	B	0.715	C	0.020	NO	0.646	B	-0.049	---
		Mid-day	0.495	A	0.550	A	0.550	A	0.550	A	0.000	NO	0.489	A	-0.061	---
		PM	0.656	B	0.735	C	0.929	E	0.951	E	0.022	YES	0.918	E	-0.011	YES
12	San Vicente Boulevard/ Melrose Avenue	AM	0.814	D	0.937	E	1.120	F	1.121	F	0.001	NO	1.121	F	0.001	---
		Mid-day	0.520	A	0.578	A	0.923	E	0.925	E	0.002	NO	0.925	E	0.002	---
		PM	0.772	C	0.888	D	1.233	F	1.235	F	0.002	NO	1.235	F	0.002	---
13	San Vicente Boulevard/ Beverly Boulevard	AM	0.723	C	0.811	D	1.050	F	1.057	F	0.007	NO	1.057	F	0.007	---
		Mid-day	0.630	B	0.705	C	0.964	E	0.972	E	0.008	NO	0.972	E	0.008	---
		PM	0.746	C	0.838	D	1.100	F	1.109	F	0.009	NO	1.109	F	0.009	---
23	Doheny Drive/ Beverly Boulevard	AM	0.781	C	0.878	D	0.938	E	0.939	E	0.001	NO	0.939	E	0.001	---
		Mid-day	0.771	C	0.868	D	0.981	E	0.984	E	0.003	NO	0.984	E	0.003	---
		PM	0.830	D	0.935	E	1.048	F	1.051	F	0.003	NO	1.051	F	0.003	---
24	Robertson Boulevard/ Melrose Avenue	AM	0.721	C	0.809	D	1.125	F	1.127	F	0.002	NO	1.127	F	0.002	---
		Mid-day	0.672	B	0.753	C	1.175	F	1.177	F	0.002	NO	1.177	F	0.002	---
		PM	0.777	C	0.874	D	1.295	F	1.297	F	0.002	NO	1.297	F	0.002	---

(A) City of West Hollywood intersection impact threshold criteria is as follows:

Final v/c	LOS	Project Related Increase in v/c
> 0.900	E, F	equal to or greater than 0.020

(B) The recommended mitigation for the George Burns Road/Beverly Boulevard intersection consists of widening along the south side of Beverly Boulevard to provide an eastbound right-turn only lane (i.e., the eastbound approach configuration would include one two-way left-turn lane, two through lanes and one right-turn only lane). This improvement will require the removal of approximately four on-street parking spaces along the south side of Beverly Boulevard, west of George Burns Road. Also, restripe the northbound approach on George Burns Road to provide one shared left-turn/through lane and one right-turn only lane.

Refer to the *City of West Hollywood Traffic Impact Analysis* provided in this Final SEIR as Appendix G to the Traffic Impact Study (Appendix E to the Draft SEIR) (see Correction and Addition III.E.5) for a summary of the supplemental impact analysis prepared based on the City of West Hollywood traffic analysis methodology and threshold criteria. As indicated above in Table B and in the *City of West Hollywood Traffic Impact Analysis*, the Project is forecast to result in a significant impact at the George Burns Road/Beverly Boulevard intersection during the P.M. peak hour based on the City of West Hollywood's impact criteria. This finding is consistent with the conclusion provided in the Draft SEIR (page 212) that the George Burns Road/Beverly Boulevard intersection would be significantly impacted by the proposed Project based on the City of Los Angeles threshold criteria.

Transportation mitigation measures recommended for the forecast impact at the George Burns Road/Beverly Boulevard intersection (i.e., provide a right-turn only lane at the eastbound approach of Beverly Boulevard and two lanes at the northbound approach of George Burns Road) are expected to reduce the potentially significant Project-related impact to less than significant levels, based on both the City of West Hollywood's and the City of Los Angeles' thresholds. Furthermore, the supplemental analysis concludes that the potential traffic impacts at the remaining five West Hollywood study intersections would be less than significant, based on the City of West Hollywood threshold criteria. Thus, no revisions of the identification of the potentially significant traffic impacts identified in the Draft SEIR are required. The utilization of the City of West Hollywood impact threshold criteria is included on page 181 of the Draft SEIR (see Correction and Addition III.C.3 of this Final SEIR).

Response 4-2

This comment refers to a mid-day peak hour analysis for selected intersections. As discussed below, a mid-day peak hour analysis has been completed (see *Appendix G: City of West Hollywood Traffic Impact Analysis* of the Traffic Impact Study included as Appendix E of the Draft SEIR) and concludes that the proposed Project will not result in any significant impacts.

Pages 160 and 161 of the Draft SEIR provide a discussion regarding the traffic counts and traffic analysis periods evaluated in the traffic analysis. In order to identify the morning (A.M.) and afternoon (P.M.) peak hour for each intersection, manual traffic counts were conducted at the 22 study intersections during the weekday morning and afternoon commuter periods (7:00 to 9:00 A.M. and 4:00 to 6:00 P.M.). The peak one-hour (e.g., 7:15 to 8:15 A.M.) traffic volume was determined for each study intersection for both A.M. and P.M. peak hours. The weekday morning and afternoon commuter peak hours were evaluated in the traffic analysis consistent with the requirements provided in the LADOT *Traffic Study Policies and Procedures* manual (March 2002).

Refer to Response 4-1 for a discussion of the supplemental analysis of the study intersections in the City of West Hollywood that has been prepared for inclusion in this Final SEIR. In addition to the intersections of Robertson Boulevard/Melrose Avenue and Doheny Drive/Beverly Boulevard (as requested to be analyzed by the commentor), the four City of West Hollywood study intersections evaluated in the Draft SEIR and analyzed in the Project Traffic Impact Study (No. 1: Robertson Boulevard/Beverly Boulevard, No. 6: George Burns Road/Beverly Boulevard,

No. 12: San Vicente Boulevard/Melrose Avenue, and No. 13: San Vicente Boulevard/Beverly Boulevard) have been included in this supplemental analysis. This supplemental analysis has been prepared based on the City of West Hollywood impact threshold criteria for the weekday A.M. peak hour, mid-day peak hour and P.M. peak hour. As shown in Table B above, the mid-day peak hour analysis of *V/C* levels and LOS determined the potential significant impacts at the City of West Hollywood intersections, considering existing traffic, ambient growth, traffic from Related Projects, and Project-traffic during the 2023 build-out year. Consistent with the findings in the Draft SEIR, a significant impact is anticipated during the P.M. peak hour at the intersection of George Burns Road/Beverly Boulevard (Int. No. 6). During the mid-day peak hour, based on the City of West Hollywood threshold criteria, no significant impacts are expected at any of the City of West Hollywood study intersections or the two additional intersections (Robertson Boulevard/Melrose Avenue and Doheny Drive/Beverly Boulevard) analyzed.

Response 4-3

The comment references the analysis of the Project's potential traffic impacts to the Congestion Management Program ("CMP") monitoring stations as provided in the Draft SEIR. Specifically, page 174 of the Draft SEIR lists the CMP monitoring stations located in the vicinity of CSMC, and the corresponding analysis is provided on page 217 of the Draft SEIR. As discussed in the Draft SEIR, a CMP monitoring station must be analyzed if the Project is expected to add 50 or more A.M. or P.M. peak hour trips to the intersection. As stated on page 217, the Project is not expected to add 50 or more trips to the CMP monitoring stations evaluated in the Draft SEIR, thus no further review was required. As requested in the comment, page 174 of the Draft SEIR will include the Doheny Drive/Santa Monica Boulevard intersection as a CMP monitoring station located in the vicinity of CSMC (see Correction and Addition III.C.2 of this Final SEIR). The Project is forecast to add only a nominal number of trips (i.e., fewer than 10 trips during the A.M. or P.M. peak hours) to this intersection, thus, fewer than 50 Project-related trips will be added to the Doheny Drive/Santa Monica Boulevard intersection and no further review of this CMP monitoring station is required.

Response 4-4

This comment requests supplemental analysis of the intersections located within the City of West Hollywood pursuant to West Hollywood threshold criteria. Four City of West Hollywood study intersections evaluated in the Draft SEIR and Traffic Impact Study (No. 1; Robertson Boulevard/Beverly Boulevard, No. 6: George Burns Road/Beverly Boulevard, No. 12: San Vicente Boulevard/Melrose Avenue, and No. 13: San Vicente Boulevard/Beverly Boulevard), as well as two additional West Hollywood intersections (Robertson Boulevard/Melrose Avenue and Doheny Drive/Beverly Boulevard) have been included in this supplemental analysis.

A reference to West Hollywood threshold criteria has been added to page 181 of the Draft SEIR (see Correction and Addition III.C.3 of this Final SEIR). It should be noted that the City of Los Angeles criteria are similar to and somewhat more stringent than the City of West Hollywood criteria for LOS E and F. Regardless, the level of significance for the Project is based on criteria defined by the Lead Agency, the City of Los Angeles.

Refer to Responses 4-1 and 4-2 for a discussion of the supplemental analysis of the study intersections in the City of West Hollywood that has been prepared for inclusion in the Final SEIR. This supplemental analysis has been prepared based on the City of West Hollywood impact threshold criteria for the study intersections for the weekday A.M. peak hour, mid-day peak hour and P.M. peak hour. As indicated in the *City of West Hollywood Traffic Impact Analysis* and Table B in Response 4-1 above, the proposed Project is expected to create a significant impact at the George Burns Road/Beverly Boulevard intersection during the P.M. peak hour based on the City of West Hollywood's impact criteria. This finding is consistent with the conclusion in the Draft SEIR (page 212) that the George Burns Road/Beverly Boulevard intersection would be significantly impacted by the proposed Project based on the City of Los Angeles threshold criteria.

Transportation mitigation measures recommended for the forecast impact at the George Burns Road/Beverly Boulevard intersection (i.e., provide a right-turn only lane at the eastbound approach of Beverly Boulevard and two lanes at the northbound approach of George Burns Road) are expected to reduce the potentially significant Project-related impact to a less than significant level. Furthermore, the supplemental analysis concludes that the potential traffic impacts at the remaining five West Hollywood study intersections employing the City of West Hollywood threshold criteria would be less than significant. Thus, no revisions are required to the potentially significant traffic impacts identified on page 212 in the Draft SEIR.

Response 4-5

This comment requests coordination with cities other than the City of Los Angeles (e.g., City of West Hollywood) if those cities might be impacted by the hauling of materials. This comment has been incorporated on pages xxviii and 236 of the Draft SEIR (see Correction and Additions III.A.3 and III.C.8 of this Final SEIR). This clarification has also been added to *Section II.D: Summary of Project Impacts* and *Section V: Mitigation Monitoring Program* of this Final SEIR.

Response 4-6

This comment requests that the George Burns Road/Beverly Boulevard intersection be identified as a City of West Hollywood intersection and that it be analyzed pursuant to City of West Hollywood threshold criteria.

Study Intersection No. 6 (George Burns Road/Beverly Boulevard) is located within the city limits of West Hollywood and is identified as such on page 161 of the Draft SEIR. As noted above in Response 4-4, the City of Los Angeles threshold criteria already encompasses the criteria stated for the City of West Hollywood. Page 212 appropriately identifies the impact at Intersection No. 6 as "significant", which is true regardless of which criteria are used; therefore, no change is required. A note has been included in the *Summary of Project Impacts* (see Section II.D and Correction and Addition III.A.2), however, to clarify this information for readers of the Summary.

Refer to Responses 4-1, 4-2, and 4-3 above for a discussion of the supplemental analysis of the study intersections in the City of West Hollywood that has been prepared for inclusion in the Final SEIR.

Response 4-7

This comment refers to the inclusion of traffic volume figures for the "Project Only" and "Future With Project" scenarios in the Draft SEIR. The figures for peak hour traffic volumes for the "Project Only" were provided in the Draft SEIR (see pages 188 and 189 for *Figure 38, A.M. Peak Hour Project Traffic Volumes* and *Figure 39, P.M. Peak Hour Project Traffic Volumes*). The "Future With Project" figures were included in the Traffic Impact Study provided as *Appendix E: Traffic Impact Study* to the Draft SEIR (Figures 9-5 and 9-6 for the A.M. and P.M. peak hours, respectively). These figures have been added to this Final SEIR for clarification (see Correction and Additions III.C.5 and III.C.6 of this Final SEIR).

Response 4-8

This comment acknowledges that the City of West Hollywood approves, in concept, the recommended mitigation measures for the George Burns Road/Beverly Boulevard intersection as described in the Draft SEIR on pages 216 and 217. A concept sketch of the recommended mitigation is included in *Appendix E: Traffic Impact Study* to the Draft SEIR and a 40-scale concept plan was provided to LADOT to demonstrate the feasibility of the measure as part of the Draft SEIR traffic analysis. The Draft SEIR notes on page 216 that the intersection is located within the City of West Hollywood and, thus, implementation of the recommended mitigation is beyond the control of the Lead Agency (the City of Los Angeles). The Applicant has indicated that it will direct its consultants to prepare and submit plans (in 1"=20' scale) to the City of West Hollywood Transportation Division for the mitigation measure.

Page 216 of the Draft SEIR states that the recommended mitigation measure might cause the need to remove approximately four existing street parking spaces along the south side of Beverly Boulevard, west of George Burns Road. These parking spaces are primarily adjacent to property owned by CSMC, which provides required off-street parking for its use. Thus, the removal of these street parking spaces is expected to result in less than significant secondary impacts. The Applicant has indicated, however, that it will coordinate with City of West Hollywood representatives to determine potential measures to off-set the removal of parking spaces along the south side of Beverly Boulevard, west of George Burns Road, in conjunction with implementation of the recommended mitigation measure.

Response 4-9

This comment references the traffic mitigation measures listed in the Draft SEIR beginning on page 237 that will be completed prior to issuance of a Certificate of Occupancy for the Advanced Health Science Pavilion. As noted on page 236 of the Draft SEIR, several of these mitigation measures will be implemented as part of the Advanced Health Sciences Pavilion (Related Project No. LA 39A). Several of these measures have received preliminary design approval but are undergoing final permitting and "final sign-off " by the Cities of Los Angeles, West Hollywood,

and Beverly Hills. The determination that the measures are feasible, along with the requirement for the measures to be completed prior to the issuance of the Certificate of Occupancy for the Advanced Health Science Pavilion (which is under construction), means that these measures will not be required for this Project. The City of West Hollywood reviewed and approved the measures (or appropriate substitute measures approved for implementation by the City of West Hollywood and the City of Los Angeles). Details of the approved measures are provided below and are included in this Final SEIR.

Regarding mitigation measure "MM TRF-N/A" on page 237 of the Draft SEIR, in reference to San Vicente Boulevard/Melrose Avenue: In its May 22, 2000 letter to the City of Los Angeles, the City of West Hollywood recommended that CSMC pay the City of West Hollywood $15,000 for the cost of implementing "…roadway striping, signing, and other safety improvements at the San Vicente Boulevard/Melrose Avenue intersection, to be identified after completion of the current Santa Monica Boulevard reconstruction project. The City of West Hollywood has determined that the impacts of the CSMC Master Plan will be fully mitigated at the intersection through payment of this fee." The Applicant subsequently forwarded the $15,000 payment to the City of West Hollywood on July 23, 2002. The May 22, 2000 and July 23, 2002 correspondences have been included in this Final SEIR as *Appendix J: Traffic Mitigation Measure Correspondences* to the Traffic Impact Study (Appendix E of the Draft SEIR) (see Correction and Addition III.E.8). Thus, the Applicant has no further mitigation responsibilities at the San Vicente Boulevard/Melrose Avenue intersection.

Regarding mitigation measure "MM TRF-N/A" on page 238 of the Draft SEIR, in reference to San Vicente Boulevard between Beverly Boulevard and Burton Way: In the May 22, 2000 letter, the City of West Hollywood stated that "…the striping of the southbound right-turn lane on San Vicente Boulevard at the Beverly Boulevard intersection, as well as the installation of the ATCS [Adaptive Traffic Control System] traffic signal equipment will mitigate the CSMC Master Plan traffic impacts at this location." The ATCS equipment has been installed by the City of Los Angeles. For the right-turn lane on southbound San Vicente Boulevard, the City of West Hollywood has reviewed the construction plans and provided comments. Upon approval by the City of Los Angeles (the lead permitting agency), the engineering plans will be submitted to the City of West Hollywood Transportation Division for final approval. The improvements will be completed prior to issuance of a Certificate of Occupancy for the Advanced Health Sciences Pavilion.

Regarding mitigation measure "MM TRF-N/A" on page 239 of the Draft SEIR, in reference to Robertson Boulevard and Beverly Boulevard: In the May 22, 2000 letter, the City of West Hollywood stated that "…the installation of the ATCS [Adaptive Traffic Control System] traffic signal equipment will mitigate the CSMC Master Plan traffic impacts at this location." The City of Los Angeles has installed the ATCS equipment.

Response 4-10

The commentor identifies concerns related to the localized high groundwater levels and the potential for impacts to adjacent areas. This issue has been addressed previously in the Original EIR (see page 33 of the Original EIR). Groundwater issues were determined to be less than

significant, as discussed in *Section VI.A: Effects Not Found to Be Significant* of the Draft SEIR. Groundwater levels in the Project Site area range from approximately seven feet to 20 feet below grade. Due to the shallow depth of the groundwater, dewatering will be required during excavation activities. Basement walls and floor slabs of the proposed subterranean structure would be waterproofed and designed to withstand the potential hydrostatic pressure imposed on the structure by groundwater, or would utilize a continuous dewatering or subdrainage system. Such systems would be constructed following recommendations made by a licensed engineer prepared specifically for the subterranean structure. The commentor is correct that if permanent dewatering is chosen as the means to control hydrostatic pressure, it will require periodic monitoring and may also require on-going filtering of the extracted groundwater. Such monitoring is required by State and Federal regulations, however, and would be incorporated in the recommendations prepared by a licensed engineer (see Correction and Addition III.D.1. of this Final SEIR).

The Project will be designed in a manner similar to buildings in the Project vicinity (which typically consists of minimizing subterranean elements that extend into the water table and waterproofing those subterranean elements that do extend into the water table), which minimizes the need for dewatering; hence, large volumes of pumped/drained water are not anticipated. The Project Site is in a confined aquifer referred to as the Hollywood Basin, which is bounded by the Santa Monica Mountains and the Hollywood Fault on the north, the Elysian Hills on the east, the Newport-Inglewood Uplift on the west, and the La Brea High (a subsurface geologic structure roughly following Third Street) on the south.[1] The Newport-Inglewood Uplift and the La Brea High act as barriers restricting, but not preventing, the flow of groundwater out of the Basin.[2] Limited production or groundwater pumping has occurred in the Basin over the past 20 years.[3] Data from the Los Angeles County Department of Public Works on the historical groundwater levels in the Hollywood Basin suggests that since the reduction of large-scale extractions of water from the Basin by overlying municipalities, the inflows and outflows in the Basin are now generally balanced.[4] As a result, there is limited effect from natural recharge and annual variations in ground water levels are only a few feet.

Since the local aquifer is under pressure, it appears that sufficient hydrostatic pressure is available to offset the loss of any waters removed through dewatering. Conversely, and as addressed in Response 23.1 of the Original Final EIR (page F-113), the construction of buildings does not have any "damming" effect on groundwater tables. The storm drain system and its capacity are not dependent on or affected by groundwater levels. Because the groundwater in the Project area is in a confined aquifer, the construction of engineered building systems that effectively function as a barrier to groundwater cause the pressurized waters encountering these subterranean structures to flow around the structure(s). The water is not "dammed" behind the structure and therefore does not cause the groundwaters to pool and elevate the water table levels. Drainage and subterranean flooding issues experienced by some developments in the

[1] Metropolitan Water District, *Chapter IV –Groundwater Basin Reports, Los Angeles County Coastal Plain Basins – Hollywood Basin*, September 2007.
[2] California Department of Water Resources (DWR), *Bulletin—Coastal Plain of Los Angeles Groundwater Basin, Hollywood Subbasin*, February 27, 2004.
[3] Metropolitan Water District, *Chapter IV –Groundwater Basin Reports, Los Angeles County Coastal Plain Basins – Hollywood Basin*, September 2007.
[4] Ibid.

surrounding areas are likely due to construction designs that did not adequately account for the existing natural groundwater conditions and/or were designed before the underlying conditions were fully understood.

Furthermore, because the Project would not change the permeable area from existing conditions, nor would the Project result in the extraction of local groundwater for potable water supply, the Project is not anticipated to change the volume of groundwater in the local area.

Therefore, the Project is not anticipated to result in significant impacts associated with ground water levels and the issue has been adequately addressed in the Original EIR and the Draft SEIR. For clarification, additional language has been added to pages 311 and 312 of the Draft SEIR (see Correction and Addition III.D.1 of this Final SEIR).

Response 4-11

The commentor identifies concerns that the 185-foot tall Project would cast shadows on properties in the City of West Hollywood, including on Beverly Boulevard (located north of the Project site). Shade and shadow issues were determined to be less than significant as discussed in *Section VI.A: Effects Not Found to Be Significant* of the Draft SEIR. As discussed in the Draft SEIR, the Original EIR (on pages 86-93) included a detailed shade/shadow assessment of a 175-foot tall building on the Project Site from which it was determined that the building on the Project Site would cast a maximum shadow length of 515 feet during the winter solstice. During the morning hours, the shadow would affect the low-rise office and retail buildings on the south side of Beverly Boulevard and Beverly Boulevard itself. However, because the building on the Project Site would not obstruct sunlight on any residential properties, the Master Plan would have less than significant project-level impacts on aesthetics (including visual character, artificial light, and shade/shadow), but that it would have direct and indirect cumulative impacts on views and with respect to illumination and shadows. All impacts related to aesthetics were reduced to less than significant through mitigation measures adopted from the Original EIR. The 185-foot Project would cast a similar shadow as that analyzed in the Original EIR, but would not create any new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to shade/shadows, as well as views and scenic vistas.

COMMENT LETTER #5

October 27, 2008

Adam Villani, Environmental Review Coordinator
Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, California 90012

RE: Draft Environmental Impact Report
Cedars-Sinai Medical Center – West Tower Project
ENV-2008-0620-EIR

Dear Mr. Villani:

Thank you for providing the City of Beverly Hills with a copy of the Notice of Completion for the above referenced Draft Environmental Impact Report ("EIR") for the Cedars-Sinai Center Project (hereafter the "Project"). Given the project site's close proximity to the City of Beverly Hills, the City offers the following comments and requests to be kept on the project's list of interested parties and to receive copies of all notices issued regarding this. Further, the City requests a copy of any notice of determination that may be filed with respect to the Project, pursuant to the provisions of Public Resources Code Section 21197 (f). 1

Traffic and Circulation

1- There is a difference between the way Beverly Hills and this DEIR calculate LOS. The City of Beverly Hills assesses circulation impacts using the ICU method (using 1,600 vehicles per hour lane capacity). Since the City of Los Angeles uses a different method of calculation (CMA), Beverly Hills requests that the intersections of Robertson/Wilshire and La Cienega/Wilshire be studied using the City of Beverly Hills' methodology (ICU method). This will help confirm whether these two intersections are impacted with respect to our thresholds of significance. Please use

Department of Community Development, 455 N. Rexford Drive, Beverly Hills, California 90210 *p* (310) 285-1123 *f* (310) 858-9166 BeverlyHills.*org*

COMMENT LETTER #5
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two scenarios of the cumulative + ambient volumes to identify LOS prior to the project trips and after the project trips. Please include these calculations as an appendix item. **1**

2- It is Beverly Hills' experience that streets in the area have high volumes on weekends, particularly on Saturdays, in the vicinity of centers of retail activity such as the Beverly Center and nearby retail stores. Please provide an explanation as to why an analysis of Saturday peak was not included for LOS study. **2**

3- The method of estimating trip generation appears to be very conservative. Trip generation has been estimated on a per hospital bed basis. On a floor area basis, the Institute of Tranportation Engineers' (ITE) *Trip Generation* manual would produce substantially higher trip generation for the project. As such, the Draft EIR may be seriously underestimating the Project's potential circulation impacts on the area. In addition, given that the Cedars-Sinai Medical Center's existing operation generates traffic, why weren't rates based on its operation either utilized or used to validate the chosen method of estimating trip generation? Please explain why the method of trip generation for the EIR was chosen. **3**

4- Based on Figure 37, no trips have been distributed to Willaman Drive, yet the residential analysis in the Draft EIR indicates that eight percent of the project's daily traffic would utilize this street between Third Street and Burton Way. Please explain this inconsistency. Willaman Drive experiences considerable through traffic in Beverly Hills because signals at Third Street, Burton Way, Wilshire Boulevard, and Olympic Boulevard facilitate these movements when Robertson Boulevard and La Cienega Boulevard become congested. Therefore, the percentage of project trips distributed to and from Willaman is expected to be the highest during peak periods. There is a similar discrepancy with respect to Alden Drive, west of Robertson Boulevard. Figure 37 indicates a two percent trip distribution but the residential street analysis indicates a five percent distribution. This could affect the LOS calculations at Robertson and Alden. **4**

5- Trip distribution at the Alden/Robertson intersection appears to be fairly conservative for eastbound through movement to the facility (2%). As Robertson Boulevard is reaching its one lane capacity per direction at the present time, alternative access points such as the use of local streets west of Robertson such as Alden Drive and streets in Beverly Hills would be an attractive and direct route to reach the Cedar-Sinai Medical Center. Based on this observation, it is recommended that the segment of Alden Drive between Doheny and Wetherly be studied for potential residential impact. **5**

COMMENT LETTER #5
CONTINUED

6- There is a discrepancy between the Parking Analysis and the Circulation Analysis. The parking analysis addresses 87,900 square feet of medical office suites that is not addressed in the circulation analysis. **6**

Transit Lines

7- In discussion of existing public transit routes (page 172 and table 25), please note in the FEIR that none of the Metro lines 218, 220, 305, 550 go through the City of Beverly Hills. **7**

Haul Routes

8- Please identify the proposed haul routes. Haul routes passing through the City of Beverly Hills may be subject to certain restrictions. **8**

9- Please identify the size of a typical heavy haul truck. This information is important for calculating the number of trips required for dirt removal. As a comparative base, the City of Beverly Hills uses 10 cubic yards per truck to estimate the number of trips needed to remove dirt materials. **9**

Mitigation Measures

10- Page 240, MM TRF-N/A : In addition to intersections noted in paragraphs (a) and (b), the two intersections of Wilshire/Willaman and Wilshire/Gale were included in the payment of $100,000 per intersection to the City of Beverly Hills (a total of $400,000 for four intersections). This measure has not been completed and the City of Beverly Hills has not been paid any money for these measures and therefore, contrary to the statement made at that end of this discussion in the Draft EIR, this measure has <u>not</u> been complted and should be required of the proposed project. **10**

<u>Housing and Employment</u>

11- The Draft EIR does not provide a housing/employment analysis. ITE provides rates both on a floor area basis and on a per-employee basis. ITE daily rates imply 369 employees, with corollary housing needs. While this is not a suggested approach for estimating jobs, this exercise reveals a need for a housing & employment impact analysis. **11**

COMMENT LETTER #5
CONTINUED

The City of Beverly Hills appreciates your consideration of our continued interest in the development of projects in adjacent jurisdictions. If you have any questions regarding this letter or the City's policy's with regard to environmental review, please feel free to contact Larry Sakurai, Principal Planner, in the City's Planning Division at (310) 285-1123. Please include Larry Sakurai, Principal Planner, as the contact person for the City of Beverly Hills in your contact list for this project.

Sincerely,

JONATHAN LAIT
City Planner

cc: Roderick J Wood, City Manager
Katie Lichtig, Assistant City Manager
Anne Browning-McIntosh, Acting Community Development Director
David Gustavson, Director of Public Works

IV. COMMENT LETTERS AND RESPONSES TO COMMENTS

E. COMMENT LETTER NO. 5

Jonathan Lait
City Planner, Department of Community Development
City of Beverly Hills
455 N. Rexford Drive
Beverly Hills, CA 90210
October 27, 2008

Response 5-1

This comment requests a supplemental analysis of two intersections (No. 5: Robertson Boulevard/Wilshire Boulevard, and No. 21: La Cienega Boulevard/Wilshire) located in the City of Beverly Hills to be prepared for inclusion in the Final SEIR. As requested in the comment, this supplemental analysis has been prepared based on the City of Beverly Hills traffic analysis methodology and significant impact threshold criteria (see below *Table C: City of Beverly Hills Intersection Impact Threshold Criteria*) for the study intersections for the weekday A.M. peak hour and P.M. peak hour. According to the City of Beverly Hills method for calculating the level of impact due to traffic generated by the proposed Project, a significant transportation impact is determined based on the criteria presented in Table C below.

TABLE C
CITY OF BEVERLY HILLS –INTERSECTION IMPACT THRESHOLD CRITERIA

Final *V/C*	Level of Service	Project Related Increase in *V/C*
> 0.800 - 0.900	D	equal to or greater than 0.040
>0.900	E or F	equal to or greater than 0.020

The sliding scale method requires mitigation of Project traffic impacts whenever traffic generated by the proposed development causes an increase of the analyzed intersection *V/C* ratio by an amount equal to or greater than the values shown above. By comparison, the City of Los Angeles' impact criterion for intersections forecast to operate at LOS E or F (provided on *Table 27: City of Los Angeles Intersection Impact Threshold Criteria* on page 181 of the Draft SEIR) are more strict than the significance thresholds of the City of Beverly Hills. Furthermore, the City of Beverly Hills significance thresholds do not apply to intersections forecast to operate at LOS D or better. The City of Los Angeles criteria provides significance threshold for intersections forecast to operate at LOS C and D. By comparison, the City of Los Angeles impact criterion for intersections forecast to operate at LOS E or F (provided in Table C) are more strict than those of Beverly Hills. *Table D: City of Beverly Hills Supplemental Traffic Impact Analysis* shows changes to the *V/C* levels and LOS at the Beverly Hills intersections, utilizing City of Beverly Hills methodology, from existing conditions with and without the proposed Project in the build-out year of 2023.

TABLE D
CITY OF BEVERLY HILLS SUPPLEMENTAL TRAFFIC IMPACT ANALYSIS

			[1]		[2]		[3]		[4]			
			YEAR 2008		YEAR 2023 W/ AMBIENT		YEAR 2023 W/ RELATED		YEAR 2023 W/ PROPOSED		CHANGE SIGNIF.	
		PEAK	EXISTING		GROWTH		PROJECTS		PROJECT		V/C	IMPACT
NO.	INTERSECTION	HOUR	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	[(4)-(3)]	
5	Robertson Boulevard/ Wilshire Boulevard	AM	1.061	F	1.205	F	1.533	F	1.537	F	0.004	NO
		PM	1.043	F	1.185	F	1.559	F	1.562	F	0.003	NO
21	La Cienega Boulevard/ Wilshire Boulevard	AM	1.086	F	1.234	F	1.564	F	1.568	F	0.004	NO
		PM	1.148	F	1.305	F	1.684	F	1.687	F	0.003	NO

City of Beverly Hills intersection impact threshold criteria is as follows:

Final v/c	LOS	Project Related Increase in v/c
>=0.801 - 0.900	D	equal to or greater than 0.040
> 0.901	E,F	equal to or greater than 0.020

Refer to the *City of Beverly Hills Traffic Impact Analysis* contained in this Final SEIR as Appendix H to the Traffic Impact Study (Appendix E of the Draft SEIR) (see Correction and Addition III.E.6) for further explanation of the supplemental impact analysis prepared based on the City of Beverly Hills traffic analysis methodology and threshold criteria. As indicated in Table D above, the Project is expected to create a less than significant impact at the two City of Beverly Hills intersections (Robertson Boulevard/Wilshire Boulevard and La Cienega Boulevard/Wilshire Boulevard) during the A.M. and P.M. peak hours based on the City of Beverly Hills impact criteria. This finding is consistent with the conclusion in the Draft SEIR (page 212) as determined based on the City of Los Angeles threshold criteria. Thus, no revisions are required to the potentially significant traffic impacts identified in the Draft SEIR. The utilization of the City of Beverly Hills impact threshold criteria has been acknowledged on page 181 of the Draft SEIR (see Correction and Addition III.C.3 of this Final SEIR).

Response 5-2

This comment refers to the time periods selected for analysis in the Project traffic study and Draft SEIR and requests a response as to why analysis of Saturday peak traffic was not included in the traffic study or Draft SEIR. Pages 160 and 161 of the Draft SEIR provide a discussion regarding the traffic counts and traffic analysis periods evaluated in the traffic analysis. In order to identify the morning (A.M.) and afternoon (P.M.) peak hour for each intersection, manual traffic counts were conducted at the 22 study intersections during the weekday morning and afternoon commuter periods (7:00 to 9:00 A.M. and 4:00 to 6:00 P.M.). The peak one-hour (e.g., 7:15 to 8:15 A.M.) traffic volume was determined for each study intersection for both A.M. and P.M. peak hours. The weekday morning and afternoon commuter peak hours were evaluated in the traffic analysis consistent with the requirements provided in the LADOT *Traffic Study Policies and Procedures* manual, March 2002. In general, the weekday commuter peak hours are analyzed as they correspond to the time periods of the highest traffic volume at the study intersections in combination with the peak generation of trips by the Project. Thus, the highest potential for significant traffic impacts caused by the Project would occur during the weekday commuter peak hours, not on Saturdays. Though traffic volume (and congestion) at Saturday

peak hours may be at or near the levels documented in the traffic study, in general, traffic counts conducted during the weekday A.M. and P.M. commuter periods are representative of peak periods found at the study intersections, including conditions that may occur through other parts of the day, or during other days of the week (i.e., weekends). Thus, analysis of traffic during other periods of the day, or on other days of the week (i.e., such as a weekend peak hour as suggested in the comment) is already covered within the existing analysis.

The formulation of the Project trip generation forecast is summarized in *Section IV.D: Transportation and Circulation*, beginning on page 185 of the Draft SEIR, and in Section 6.0 of *Appendix E: Traffic Impact Study* of the DraftSEIR. The proposed Project will include 100 inpatient beds (equivalent to 200,000 square feet of floor area) of additional authorized inpatient development on the CSMC Campus beyond the current authorized development previously approved by the City of Los Angeles. Traffic volumes expected to be generated by the proposed Project during the weekday A.M. and P.M. peak hours, as well as on a daily basis, were estimated using rates published in the Institute of Transportation Engineers' (ITE) *Trip Generation Manual*, 7th Edition, 2003. Traffic volumes expected to be generated by the proposed Project were based upon rates per number of hospital beds. ITE Land Use Code 610 (Hospital) trip generation average rates were used to forecast the traffic volumes expected to be generated by the 100 new inpatient hospital beds planned for the proposed Project. LADOT reviewed and approved the trip generation methodology and forecast used in the traffic study, per correspondence to the Department of City Planning, dated July 15, 2008 (see *Appendix F: Memorandum of Understanding and LADOT Approval* of the Traffic Impact Study included as Appendix E to the Draft SEIR).

As shown in *Table 28: Project Trip Generation*, page 185 of the Draft SEIR, the Project is forecast to generate 113 vehicle trips during the weekday A.M. peak hour and 130 vehicle trips during the weekday P.M. peak hour, which best represent the highest peaks of traffic during a typical week. For comparison purposes, however, the *Trip Generation* manual was consulted for potential trip generation during a Saturday and Sunday mid-day peak hour. Based on the trip rate factors provided therein, the Project is forecast to generate 100 vehicle trips during the Saturday mid-day peak hour and 103 vehicle trips during the Sunday mid-day peak hour. Both of the hourly generation volumes during the weekend are less than the weekday commuter peak hour periods evaluated in the Draft SEIR. Thus, the traffic analysis in the Draft SEIR already provides an appropriate worst-case assessment of the potential traffic impacts of the Project in terms of evaluating the peak period of traffic associated with the Project on the adjacent street system. Therefore, the analysis of additional peak periods of traffic, especially on Saturdays, was already covered under the conservative analysis in the Draft SEIR.

Response 5-3

This comment refers to the methodology of the vehicular trip generation forecast utilized for the Project in the traffic study and Draft SEIR. Refer to Response 5-2 to reiterate discussion regarding the preparation of the trip generation forecast for the Project as described in the Draft SEIR. As referred to in the comment, trip generation forecast is based on the number of hospital beds proposed as part of the Project. The comment is also correct that the ITE *Trip Generation* manual provides trip rates for hospitals based on floor area. However, this method would have

resulted in a substantial overstatement of the potential trips that would be generated by the Project.

The determination for using the ITE trip rates per bed was based on the planned building program of the Cedars-Sinai Master Plan, which is intended to replace older buildings with new facilities that best meet the needs of patients and physicians. The planned building program has been designed to provide newer, safer, more efficient and state of the art inpatient facilities. These facilities encompass more floor area on a per bed basis primarily due to larger, more comfortable hospital rooms and inpatient medical support facilities (e.g., imaging, etc.), as well as larger areas for administrative services, visitor amenities, etc. In general, the additional floor area is intended to accommodate more space for maneuvering and equipment needs, but not necessarily for more people. The Applicant has determined that, while a prior model of one hospital bed for every 1,000 square feet of hospital floor area was appropriate, the more current model is one hospital bed for every 2,000 square feet of hospital floor area.

It is noted on page 1091 of the ITE *Trip Generation* manual that the trip rates in the manual are based on traffic counts conducted at existing hospitals that were "…surveyed from the 1960s to the 1990s throughout the United States." Thus, the ITE trip rates do not reflect the more recent trend of providing more floor area per hospital bed. Thus, the trip generation forecast based on hospital beds is appropriate (and more accurate) compared to using the trip rates based on floor area.

Existing trip generation patterns of the CSMC Campus were also considered in the Draft SEIR. As it is noted on page 218 of the Draft SEIR, traffic counts were conducted at the existing CSMC driveways for purposes of comparing current trip generation patterns at the Campus to a forecast of the traffic generated by the existing facilities based on the ITE trip rates (including use of the ITE trip rates for hospitals on a per bed basis for the existing medical center). As discussed on page 218 of the Draft SEIR, the existing CSMC Campus generates a total of 1,921 P.M. peak hour trips. In contrast, the existing CSMC facilities are forecast to generate a total of 2,994 P.M. peak hour trips based on the ITE trip rates. This indicates that the ITE trip rates highly overstate the existing traffic by approximately 50%. Thus, use of the ITE trip rates (including the trip rate for hospitals on a per bed basis) is appropriate and sufficient for purposes of assessing the potential traffic impacts of the Project.

Response 5-4

This comment refers to the analysis of residential street segments provided on pages 220-224 in the Draft SEIR and requests clarification as to why separate Project-related vehicle trip assignment patterns were utilized in the analysis of study intersections as compared to the analysis of residential street segments. *Section IV.D.: Transportation and Circulation*, beginning on page 220 of the Draft SEIR and *Appendix E: Neighborhood Street Segment Analysis* to the Traffic Impact Study (Appendix E of the Draft SEIR) (see Correction and Addition III.E.3) provide a summary of the neighborhood street segment analysis prepared to evaluate potential Project-related impacts on local residential streets. The residential street segment analysis was prepared in response to questions and comments received during the NOP process for the proposed Project in order to provide a worst-case scenario for traffic impacts, not only for major

study intersections, but also for small residential streets in the Project area. The significance of the potential impacts of Project-generated traffic at the study street segments was identified using criteria set forth in the City's *Traffic Study Policies and Procedures* manual (March 2002). *Table 31: Residential Street Segment Impact Threshold Criteria* on page 222 of the Draft SEIR presents the City of Los Angeles residential street segment impact threshold criteria.

A total of 11 residential street segments in the Project area were analyzed to determine the potential Project-related impacts of cut-through traffic on these residential streets. Willaman Drive, which is located to the south of the CSMC Campus and is the subject of the comment was included in the traffic study. The study street segments were selected for analysis based on the NOP comments and proximity to the CSMC Campus. The analyzed street segments are situated within well-established, built-out residential neighborhoods, which do not offer many opportunities for direct cut-through traffic. As such, nearly all Project-related traffic is anticipated to travel along the key arterials that provide direct access to the CSMC Campus (i.e., Beverly Boulevard, San Vicente Boulevard, Third Street, and Robertson Boulevard). A small number of Project-related motorists may use local residential streets that feed into the CSMC Campus as alternate routes of travel based on perceived convenience, such as Alden Drive, Hamel Drive, Willaman Drive, and Sherbourne Drive. A smaller portion of Project-related motorists could potentially use local streets that do not directly feed into the CSMC Campus, including Ashcroft Avenue, Rosewood Avenue, Bonner Drive, and Huntley Drive.

The differences in the trip assignments utilized for the analysis of study intersections as compared to the analysis of study street segments was done to provide a worst-case assessment for each evaluation. Both analyses utilize the same traffic generation rates for the Project. For each analysis, the higher percentage of trips was utilized to provide a worst-case analysis of traffic. However, this means the highest percentage of traffic was assigned to the study intersections for the intersection analysis and the highest practical percentage of Project-related traffic was assigned to the local streets for the street segment analysis. The differences in percentages provided in the study intersection analysis and the street segment analysis are not differences in the overall amount of traffic produced by the Project; rather, the differences are in the trip distribution of Project traffic at the study intersections and study street segments. Since the study intersection analysis is based on CMA, trips were distributed at intersections in a manner that would produce the worst-case scenario from the Project. Similarly, in producing a worst-case scenario along the residential streets in the Project area, the highest potential percentage of traffic was distributed to the street segments based on their existing traffic and proximity to the CSMC Campus. As a result, each analysis provides a worst-case assessment of potential Project-related impacts for that issue.

The distribution and assignment of the Project's forecast daily traffic to the analyzed residential street segments was determined based on the street's current relative traffic volumes, as well as relative access to the CSMC Campus. In general, on the local streets that do not provide direct access to the CSMC Campus (e.g., Segment Nos. 1 through 5), few, if any, trips related to the Project are expected to utilize these roadways for access (i.e., one percent or less of the total daily trips generated by the Project). For local streets that feed directly into the CSMC Campus (e.g., Segments 6 through 11), it is reasonable to anticipate that a relatively higher percentage of Project-related trips may occur on these roadways, likely in the two to four percent range of total

daily trips generated by the Project. This relative distribution of Project-related trips on the local streets is consistent with the Project-related traffic distribution pattern on the major arterials (Beverly Boulevard, Third Street, Robertson Boulevard, San Vicente Boulevard, etc.) that LADOT approved for use in the traffic study. To provide the worst-case assessment of the potential Project-related impacts to the local residential streets, however, a substantially higher use of these roadways was assumed by Project-generated daily trips (i.e., two percent for local streets that do not provide direct access to the CSMC Campus and three to eight percent for local streets that do provide direct access to the CSMC Campus).

Table 32: Summary of Street Segment Analysis on page 223 of the Draft SEIR summarizes the street segment analysis of potential Project-related impacts on local residential streets. As summarized in *Table 32: Summary of Street Segment Analysis*, application of LADOT threshold criteria indicated that the Project is not anticipated to produce substantial cut-through traffic on local residential streets. Even with an overstated assignment of Project-related daily traffic on local residential streets (e.g., Willaman Drive is shown on Table 32 to accommodate 8% of Project-related daily traffic on the segment north of Burton Way and 5% of Project-related daily traffic on the segment south of Burton Way), the potential effects are deemed less than significant because the incremental increase in cut-through traffic due to the Project is substantially below the significance thresholds used by LADOT.

In the case of Willaman Drive, as shown in *Figure 37: Project Trip Distribution* (on page 187 of the Draft SEIR), the intersection analysis shows that all of the potential Project trips associated with through-traffic on Willaman Drive were distributed to the intersections with Third Street and Wilshire Boulevard which provides a worst-case scenario at those study intersections. The street segment assessment analyzes 8% and 5% of trips distributed to the two street segments along Willaman Drive and provides the worst-case scenario along this segment to determine any potential significant impacts. Similarly, for Alden Drive, 32% of Project trips were distributed to turning movements onto Roberston Boulevard to provide a worst-case scenario at the Robertston Boulevard/Beverly Boulevard and Roberton Boulevard/Third Street intersections. For the street segment analysis, however, 5% of Project-related trips were distributed to Alden Drive between Swall Drive and Clark Drive to provide the worst-case scenario. No significant impact was found.

Response 5-5

This comment requests that analysis be performed for the street segment of Alden Drive between Doheny Drive and Wetherly Drive. Refer to Response 5-4 for a discussion regarding the preparation of the residential street impact analysis for the Project as described in the Draft SEIR. As noted in *Table 32: Summary of Street Segment Analysis* on page 223 of the Draft SEIR, the residential street segment of Alden Drive between Swall Drive and Clark Drive (which is immediately west of Robertson Boulevard) was evaluated for potential impacts due to the Project. As concluded in *Table 32: Summary of Street Segment Analysis*, the potential impacts to the Alden Drive street segment, between Swall Drive and Clark Drive, due to the Project were found to be less than significant even with a generous assignment of 5% of Project-related traffic. The segment of Alden Drive referenced by the comment (between Doheny and Wetherly) is located approximately one-half mile west of the segment of Alden Drive analyzed

in the Draft SEIR. Thus, it is reasonable to conclude that the Project would have less than significant impacts on the segment identified in this comment because traffic disperses on intervening streets moving away from the CSMC Campus.

Response 5-6

This comment requests clarification of how the 87,900 square feet of proposed Medical Suites floor area is addressed in the traffic analysis and parking analysis. Refer to Response 5-2 for discussion regarding the preparation of the trip generation forecast for the Project as described in the Draft SEIR. The Project will include 100 inpatient beds (equivalent to 200,000 square feet of floor area) of additional authorized inpatient development on the CSMC Campus beyond the current authorized development previously approved by the City of Los Angeles. Authorization of the Project will consist of three components:

1. The proposal to develop 100 new inpatient beds (200,000 square feet);
2. Replacement of the existing 90,000 square feet of building floor area and uses contained within the Existing Building at the Project Site; and
3. Development of the anticipated 170,650 square feet of remaining floor area entitled in 1993 under the Development Agreement and Master Plan (pursuant to Ordinance Nos. 168,847).

Of these three components, only the 100 new inpatient beds (200,000 square feet of floor area) is considered "new" because the 90,000 square feet of building floor area associated with the Existing Building is existing space and the 170,650 square feet of building floor area associated with the existing Development Agreement and Master Plan is entitled and considered in the traffic analysis as a Related Project. The traffic and parking impacts associated with the 700,000 square feet of building floor area approved under the existing Development Agreement and Master Plan were analyzed in the Original EIR.

It is noted on *Table 1: Summary of Master Plan Development Completed Through 2008*, pages 19 and 20 of the Draft SEIR, that 87,900 square feet of Medical Suites is available under the current CSMC development rights pursuant to the 1993 approval (assuming construction of the Advanced Health Sciences Pavilion building). Also as shown on *Table 1: Summary of Master Plan Development Completed Through 2008*, the 87,900 square feet of Medical Suites area is part of the overall 170,650 square feet of remaining development rights. *Table 2: Summary of Uses and Square Footages in Project*, page 26 of the Draft SEIR, shows how the 87,900 square feet of Medical Suites floor area is proposed to be included as part of the Project. Since the remaining development rights are allowed to be developed with or without the Project, their potential trips were evaluated as part of the analysis of Related Projects. Specifically, the remaining development rights are considered as Related Project No. LA39B on *Table 30: Related Project Traffic Generation*, page 202 of the Draft SEIR. Thus, the potential trips associated with the build-out of the entitled Medical Suites floor area was appropriately considered in the traffic analysis.

With respect to parking, the required parking for the 87,900 square feet of Medical Suites was considered in the parking analysis. Specifically, Item No. 15 on *Table 34: Future CSMC*

Campus Parking Summary, page 231 of the Draft SEIR, allocates the required parking for the Medical Suites floor area. As shown in Table 34, 440 parking spaces (at 5.0 spaces per 1,000 square feet of floor area) are allocated to the 87,900 square feet of Medical Suites floor area and, thus, its demand is appropriately considered in the total required parking for future development at CSMC.

Response 5-7

This comment refers to a request by the commentor to note in the Final SEIR that some of the Metro lines discussed in the Draft SEIR (lines 218, 220, 305, and 550) do not travel through the City of Beverly Hills. *Section IV.D., Transportation and Circulation*, beginning on page 172 of the Draft SEIR, and in Section 4.0 of *Appendix E: Traffic Impact Study* of the Draft SEIR, provide a summary of the public bus transit service provided in the vicinity of the CSMC Campus. As noted in *Table 25: Exiting Public Transit Routes* of the Draft SEIR, the source for the Metro transit routes in the CSMC Campus area was its website (i.e., http://www.metro.net). The transit route schedules for each of the four routes (i.e., Metro lines 218, 220, 305 and 550) provided on the Metro website refer to Beverly Hills. Copies of the route schedules and maps for the four routes are contained in this Final SEIR as *Appendix I: Metropolitan Transit Authority Bus Route Schedule and Maps* to the Traffic Impact Study (Appendix E to the Draft SEIR) (see Correction and Addition III.E.7) for reference. Further information on the four cited routes is listed below:

- Metro Route 218: The nearest roadway to the City of Beverly Hills that Metro 218 travels is Third Street between George Burns Road and Fairfax Avenue. Metro 218 connects with the Metro 305 and 550 routes, which travel adjacent to the City of Beverly Hills along San Vicente Avenue, as well as Metro Rapid Bus 705 which travels through the City of Beverly Hills via La Cienega Boulevard.
- Metro Route 220: Metro 220 traverses the City of Beverly Hills via Robertson Boulevard between Burton Way and the southerly City limit.
- Metro Route 305: The nearest roadway to the City of Beverly Hills that Metro 305 travels is along San Vicente Boulevard along the easterly City limit.
- Metro Route 550: The nearest roadway to the City of Beverly Hills that Metro 550 travels is along San Vicente Boulevard along the easterly City limit.

Response 5-8

This comment requests disclosure of the proposed haul route, which may be subject to certain restrictions if passing through the City of Beverly Hills. This recommendation for coordination with cities other than the City of Los Angeles (e.g., City of Beverly Hills) if potentially impacted by the hauling of materials is noted and has been incorporated on pages xxviii and 236 of the Draft SEIR (see Correction and Additions III.A.3 and III.C.8 of this Final SEIR). This clarification has also been added to the *Summary of Project Impacts* (see Section II.D of this Final SEIR) and the Mitigation Monitoring Program (see Section V of this Final SEIR).

Response 5-9

This comment requests identification of the typical size of a construction haul truck. It is stated on page 182 of the Draft SEIR that the assessment of potential traffic impacts related to construction of the Project assumes that 14 cubic yards of material would be hauled per truck. This is based on the assumption that the Applicant will primarily utilize 20-cubic-yard trucks during the export period. The 20-cubic-yard trucks are permitted for use in the City of Los Angeles. Due to air pockets and other inefficiencies created during the transfer of material to the trucks, it has been assumed that the trucks would carry an average of 14 cubic yards per vehicle. This quantity has been assumed in the estimate of the number of trucks needed to remove material from the site in order to construct the Project.

Response 5-10

This comment refers to payment by the Applicant to the City of Beverly Hills in the maximum amount of $400,000 for intersection improvements at four intersections. According to the CSMC Development Agreement, CSMC is required to contribute to the design and installation of ATSAC or Quicnet systems at the intersections of Wilshire Boulevard/Gale Drive and Wilshire Boulevard/Willaman Drive in an amount not to exceed $100,000 for each intersection. Furthermore, according to the Q Conditions in Ordinance No. 168,847, CSMC is required to contribute to the design and installation of ATSAC or Quicnet systems at the intersections of Robertson Boulevard/Wilshire Boulevard and La Cienega Boulevard/Wilshire Boulevard in amount not to exceed $100,000 for each intersection. In sum, a maximum total of $400,000 is required as contribution to the City of Beverly Hills. It is noted on page 236 of the Draft SEIR that these improvement measures and the noted payment will be completed prior to the issuance of a Certificate of Occupancy for the Advanced Health Sciences Pavilion. Thus, the $400,000 required payment is not delinquent, as the Advanced Health Sciences Pavilion has not been issued a Certificate of Occupancy. Nevertheless, the Applicant transmitted payment to the City of Beverly Hills on December 3, 2008 and a letter dated December 3, 2008, acknowledging the payment, was received by the Lead Agency.

Response 5-11

The commentor suggests that a housing/employment impact analysis is required because the Project will generate jobs for an estimated 369 employees (based on the ITE rates used for traffic assessment). However, the commentor has not identified any potential impacts associated with this increase in employment. 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.

In the Original EIR, it was acknowledged that increases in employment opportunities at CSMC may cause some potential employees to seek housing in relatively close proximity to the Campus. However, the Project would not result in a substantial change to conditions previously considered in the Original EIR or the Wilshire Community Plan. According to the 2000 Census, the Wilshire Community Plan area contained a total population of 289,007 residents.[5] The City of Los Angeles has estimated that in 2007, the total population of the Plan area has increased to approximately 313,729 residents, representing an annual growth rate of 1.11%.[6] Furthermore, the Los Angeles Citywide General Plan Framework EIR (Section 2.3 Housing and Population) projects a total population for the Plan area of 337,144 people by a year 2010 planning horizon. As such, the potential growth from the Project is within the anticipated growth projections of the Wilshire Community Plan. As a result, the Project's potential impacts associated with population and housing would be less than significant and the issue has been adequately addressed in the Original EIR and the Draft SEIR.

[5] City of Los Angeles, Department of City Planning, Demographic Research Unit, *Department of City Planning website http://cityplanning.lacity.org/DRU/C2K/C2KRpt.cfm?geo=cp&sgo=ct#*, 2000 Census.
[6] Ibid.

COMMENT LETTER #6

Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952
213.922.2000 Tel
metro.net

Metro

RECEIVED
CITY OF LOS ANGELES
OCT 30 2008
ENVIRONMENTAL UNIT

October 24, 2008

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

Dear Mr. Villani:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Cedars-Sinai Medical Center – West Tower Project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

The Traffic Impact Analysis prepared for the Draft EIR satisfies the traffic requirements of the proposed project. However, the Transit Plan highlighted on page 36, Figure 14 of the Draft EIR should be revised for the Final EIR:

> The proposed re-routing and relocation of bus layovers for Metro bus lines 16/316 and 218 would lengthen these routes and subject the buses to additional traffic on Beverly Drive, thereby slowing bus speeds and increasing Metro's operating costs. Therefore, the proposed re-routing and relocation of bus layovers for these Metro bus lines should be considered temporary during the course of construction. Lines 16/316 and 218 should return to their former layover locations when construction is complete.

1

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

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

Sincerely,

Susan Chapman
Program Manager, Long Range Planning Manager

IV. COMMENT LETTERS AND RESPONSES TO COMMENTS

F. COMMENT LETTER NO. 6

Susan Chapman
Program Manager, Long Range Planning Manager
Los Angeles County Metropolitan Transportation Authority (Metro)
One Gateway Plaza
Los Angeles, CA 90012-2952
October 24, 2008

Response 6-1

The commentor notes that Metro does not currently have plans to make permanent changes to the existing transit routes and stops in the vicinity of the Project. This comment is in response to *Figure 14: Transit Plan* in the Draft SEIR, which shows both the existing and the Applicant's recommended future transit stops that serve the CSMC Campus. These recommendations for transit route and transit stop relocations were made with the intent to best reflect ridership needs and promote pedestrian and access safety within and around the CSMC Campus, based on the experience of CSMC. While no changes to the existing public transit routes are required due to the Project, the Applicant will continue to coordinate with Metro and local transit providers to facilitate potential route adjustments that may best reflect ridership needs and promote safety within and around the CSMC Campus. Ultimately, any changes to the transit route and stop locations will be at the discretion of Metro. Page 35 of the Draft SEIR has been revised to reflect this clarification (see Correction and Addition III.B.1 of this Final SEIR).

COMMENT LETTER #7

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October 27, 2008

Via E-mail and U.S. Mail

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

Re: Cedars- Sinai Medical Center West Tower Project
Comments to September 2008 Draft SEIR No. ENV 2008-0620-EIR

Dear Mr. Villani:

The Decurion Corporation ("Decurion") hereby submits the following comments to the City of Los Angeles Department of City Planning ("City") regarding the above-referenced proposed project (the "Project") Supplemental Draft Environmental Impact Report (the "Cedars SDEIR"). These comments follow Decurion's April 7, 2008 letter [copy attached] to the City regarding the Project, which letter is reiterated and incorporated herein by reference. 1

Thank you for the opportunity to review the Cedars SDEIR. Decurion's additional comments at this time focus on the issue of the primary access point proposed for the Project. Currently, the main access points to parking for the Cedars Sinai Medical Complex ("CSMC") are from George Burns Road, which runs north/south through the medical complex with bilateral access. The Cedars SDEIR indicates that the Project proposes relocating primary access to Alden Drive.

The Cedars SDEIR acknowledges that the Project is anticipated to create significant traffic impacts at two Project area intersections ("Intersection Nos. 2 and 6" as identified in the Cedars SDEIR). Intersection No. 2 is the newly proposed primary access to the Project site, Robertson Boulevard/Alden Drive-Gracie Allen. As mentioned in Decurion's April 7, 2008 letter to the City, Decurion owns an office building with an

COMMENT LETTER #7
CONTINUED

1

existing parking entrance and truck dock accessed via Alden Drive. Accordingly, Decurion is concerned that the proposed parking entrance at Alden Drive, adjacent to Decurion's own parking, will create unnecessary congestion and parking access/egress obstacles for Decurion's employees and guests, as well as have significant adverse impacts on neighboring office, commercial and retail businesses and their patrons.

As stated in the Cedars SDEIR:

1. The Project will have significant impacts at Intersection No. 2 during both morning and evening peak hours as demonstrated in Table 26: Summary of Volume-To-Capacity Ratios and Levels of Service utilizing the City's traffic threshold criteria. [SDEIR, p. 212.]

2. "As a result, the Project would cause significant impacts for the two intersections [referencing Intersections No. 2 and No. 6]. However, with implementation of mitigation measure improvements, the impacts for both intersections will reduce the potentially significant Project-related impacts to less than significant levels." [SDEIR, p. 212.]

However, the SDEIR also states that Project impacts at Intersection No. 2 may not be mitigated to a less than significant level and that if implemented proposed mitigation measures may result in significant impacts themselves:

3. "While the recommended mitigation measure is feasible [referencing Intersection No. 2], it is noted that the Lead Agency [City] may determine that the removal of on-street parking spaces shall not be permitted, and thus not allow implementation of the recommended mitigation measure [i.e., removal of several on-street parking spaces at Robertson]. In this circumstance, a significant unmitigated impact would result for this intersection and a Statement of Overriding Considerations should be adopted." [SDEIR, p. 245.]

4. The Cedars SDEIR acknowledges that the proposed mitigation measures for the two significantly impacted study intersections, including Intersection No. 2, will require the removal of up to ten (10) on-street parking spaces along the east side of Robertson Boulevard, which is determined to have a significant adverse effect for on-street parking. [SDEIR, p. 232.]

COMMENT LETTER #7
CONTINUED

5. The Cedars SDEIR also acknowledges that the proposed mitigation measures for the two significantly impacted study intersections, including Intersection No. 2, will require the reducing of sidewalk width from existing conditions in the Project vicinity, a second adverse effect of mitigation measure implementation. [SDEIR, pp. 215-216.]

The Cedars SDEIR concedes that the mitigation proposed for Intersection No. 2 is likely infeasible and that impacts at Intersection No. 2 are likely to remain significant and unavoidable at Project completion.[1] CEQA requires that all Project impacts be mitigated to the extent feasible. [See CEQA Guidelines § 15091 (a)(3).] This obligation cannot be avoided by adopting a Statement of Overriding Considerations. [See CEQA Guidelines § 15092 (b)(2)(A).] Feasible mitigation can include an alternative Project design. [See CEQA Guidelines § 15126.2 (b).] Where impacts can be alleviated by imposing an alternative design, the implications of such design, and the reasons for why the project is being proposed despite the alternative design's potential to reduce significant impacts, must be described in the environmental document prepared for such project. [Id.] The significant and unavoidable impact at Intersection No. 2 would likely be avoided if CSMC's primary parking access were maintained at George Burns Road. Accordingly, Decurion requests that the Cedars SDEIR be revised to analyze whether maintaining CSMC's primary access at George Burns Road is feasible.

Even if the mitigation proposed for Intersection Nos. 2 is feasible and is ultimately implemented, the potential impacts to surrounding businesses [e.g. Decurion] resulting from its implementation are not discussed in the Cedars SDEIR. CEQA requires that effects of a proposed mitigation measure be discussed in at least some detail, where a mitigation measure has the potential to cause significant effects in addition to those that would be caused by the proposed project. [CEQA Guidelines § 15126.4 (D).] While Cedars SDEIR pp. 215-16 and 233 acknowledge the potential for impacts resulting from proposed Intersection Nos. 2 mitigation measures, there is little discussion of what these impacts might be in the analysis. Given the mitigation measure's potential to

[1] In addition, Decurion is concerned that impacts at Intersection No. 2 may actually be greater than disclosed in the Cedars SDEIR. In order to account for unknown Related Projects not included in the Project traffic analysis, an ambient growth rate of one percent [1.0%] per year to the year 2023 was added to existing traffic volumes as part of the analysis. [SDEIR, p. 192.] The general traffic growth factors for the Westside of Los Angeles provided in the *2004 Congestion Management Program for Los Angeles County* (the "CMP"), and required for use as a minimum ambient growth rate by the CMP, are greater than 1.0 in every year between 2005 and 2025. [See CMP Appendix B, B-9.] Thus, it appears as though the Cedars SDEIR may underestimate potential impacts to Intersection No. 2.

COMMENT LETTER #7
CONTINUED

impact Decurion and other surrounding businesses, Decurion requests that its potential impact be further analyzed in the Cedars SDEIR. 4

Decurion hopes that the City will reconsider design plans that will change the CSMC primary surface parking entrance. If the City chooses not to reconsider the relocation of CSMC's primary parking entrance, Decurion requests that the City revise and recirculate the SDEIR to address the feasibility of maintaining the existing CSMC parking entrance, potential impacts of proposed mitigation, and the possibility that overall traffic impacts are underestimated in the SDEIR. 5

As mentioned in our prior letter, Decurion commends CSMC for introducing the proposed project and looks forward to a design that is compatible with and integrates into the surrounding community.

Please feel free to contact me at (213) 576-1005 if you have any questions regarding Decurion's comments.

Very truly yours,

Edward J. Casey

EJC/ysr

cc: Elisa L. Paster, Esq. – Paul, Hastings, Janofsky & Walker
John Manavian – Robertson Properties Group
David Hokanson – Robertson Properties Group
Dinh Huynh – Decurion Corporation, Representing Robertson Properties Group

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IV. COMMENT LETTERS AND RESPONSES TO COMMENTS

G. COMMENT LETTER NO. 7

Edward J. Casey
Alston & Bird LLP
333 South Hope Street, 16th Floor
Los Angeles, CA 90071-1410
October 27, 2008

On behalf of The Decurion Corporation

Response 7-1

The commentor summarizes factual information excerpted from the Draft SEIR regarding access, level of service, and parking in the vicinity of Robertson Boulevard/Alden Drive-Gracie Allen Drive (Study Intersection No. 2), set forth in *Section IV.D: Transportation and Circulation* (pages 157 to 245) of the Draft SEIR. As presented, the commentor's characterization of the anticipated impact at Intersection No. 2 is essentially correct. The Project access is from Alden Drive-Gracie Allen Drive. Increased trips due to vehicles entering/exiting from this access point due to the Project will reduce the level of service at nearby Intersection No. 2 (Alden Drive-Gracie Allen Drive at Robertson Boulevard) and result in an impact requiring mitigation to reduce the impact to a less than significant level.

The commentor asserts (on page 2, point no. 4) that the proposed mitigation measures in the Draft SEIR "will require the removal of up to ten (10) on-street parking spaces along the east side of Robertson Boulevard, which is determined to have a significant adverse effect for on-street parking." However, as indicated on pages 215, 216, and 232 of the Draft SEIR, the mitigation measures will require the removal of up to *six* spaces along the east side of Robertson Boulevard and up to four spaces along the south side of Beverly Boulevard, for a total removal of up to ten spaces at both locations. Implementation of the recommended mitigation to address level of service impacts at Intersection No. 2 would also require a reduction in the width of the public sidewalk from approximately 12.5 feet to 10 feet. These modifications would result in a secondary impact to adjacent businesses and pedestrians due to the reduction in available patron parking and slightly more congested sidewalk space. The Draft SEIR acknowledges the possibility that the City may not approve the recommended mitigation, thereby retaining the on-street parking and sidewalk configuration as currently exists, electing instead to accept a reduced level of service at Intersection No. 2. The Draft SEIR, however, does not "concede" that the mitigation at Intersection No. 2 is infeasible. Rather, the Draft SEIR properly identifies the potential secondary (indirect) impacts due to implementation of the mitigation measure, as CEQA requires (see CEQA Guidelines §15126.4). Disclosure of these facts allows for the decision makers to decide if accepting the secondary impacts out-weighs the value of the traffic mitigation.

Response 7-2

The commentor suggests that the level of impact identified in the Draft SEIR for Intersection No. 2 may be understated because future growth used to analyze the impacts were underestimated by use of different growth rates than those provided in the *2004 Congestion Management Plan for Los Angeles County* (CMP). The Project traffic analysis assumed an ambient growth rate of one percent (1%) per year to Year 2023 (page 192 of the Draft SEIR). The commentor is concerned that this growth rate may be too low because the CMP appears to provide ambient growth rates that are greater than 1% through Year 2025, as provided in Exhibit B-1 (page B-9) of the CMP.

The values provided in CMP Exhibit B-1 are growth factors and not growth percentages; however, these values can be used to establish the annual growth rate. Factoring the CMP growth rate requires that the comparative CMP years be averaged for the term between years. This average is calculated by subtracting the baseline year factor from the buildout year factor and dividing by the number of intervening years. For example, assuming a 2005 baseline year with a 1.036 factor and a 2025 buildout year with a 1.219 factor, the calculation would be as follows:

$$\frac{1.219 - 1.036}{20 \text{ years}} = 0.00915 \times 100 = 0.92\%$$

In this example, 0.92% represents the average annual increase in ambient growth. That is, an ambient background rate established as 1.0 during year one, would increase by 0.92% to 1.009 for year two, 1.018 for year three, and 1.028 for year four, etc. The traffic analysis for the Project assumed a 1.0% growth factor, which is slightly greater than the rate provided in the CMP. Therefore, the ambient growth rate used to evaluate Project traffic impacts is consistent with guidelines of the CMP, as well as guidelines required by LADOT. These guidelines are used as a standard for all projects evaluated by the Lead Agency. Utilization of the 1.0% ambient growth rate estimation for future traffic/trip conditions exceeds that of the CMP rates.

Response 7-3

The commentor suggests that the Project does not consider nor incorporate other potentially feasible mitigation measures that could reduce impacts at Intersection No. 2, while maintaining the on-street parking and sidewalk configuration as currently exists. Specifically, the commentor asserts that significant impacts to Intersection No. 2 could be avoided if the Project access were moved to George Burns Road. Presumably, the commentor assumes that Project vehicles would access the West Tower primarily from the Beverly Boulevard/George Burns Road intersection (Study Intersection No. 6) if the access were relocated.

The suggestion to move the access driveway oversimplifies the situation and would not provide the desired result to eliminate significant impacts at Intersection No. 2. Relocation of the Project access alone would not necessarily reduce significant impacts to Intersection No. 2. Designs for an alternate Project access were considered during the conceptual planning stages for the Project, but were rejected early in the process because the current design afforded a configuration that

minimized pedestrian conflicts, enhanced traffic safety and minimized intersection impacts better than the alternate configurations.

Furthermore, changing the Project access may result in increased impacts at other local intersections. The Project trip distribution (see *Figure 37: Project Trip Distribution* in the Draft SEIR) shows that vehicle trips to the Project are distributed from several locations. In fact, the Draft SEIR anticipated that only 34% of the Project trips would access the site from Intersection No. 2. The remaining 66% of the trips come from other access points (located to the north, east and south) to the CSMC Campus. Trip distribution assumptions are influenced primarily by regional trip patterns; thus, specific driveway locations have only a limited influence. Relocating the Project access further east on Gracie Allen Drive, or around the corner to George Burns Road, would not affect the Project trip distribution significantly from what is shown in *Figure 37: Project Trip Distribution*. Hence, a reduction in the number of Project trips moving through Intersection No. 2 would not be anticipated if the access was moved, and similar significant impacts would remain.

The only way to influence trips effectively to accomplish the effect desired by the commentor (i.e., reduce vehicles accessing the Project from Robertson Boulevard), would be to close off and/or restrict access to/from Robertson Boulevard at Alden Drive-Gracie Allen Drive. As a result, the distribution patterns would have to be changed to show that 34% of the trips would be redistributed to the three other locations that provide access to the Project Site (i.e., Beverly Boulevard/George Burns Road, San Vicente Boulevard/Gracie Allen Drive, and Third Street/George Burns Road-Hamel Drive). With this redistribution of trips, impacts at other surrounding intersections would be increased, including impacts to Intersection No. 6 (George Burns Road/Beverly Boulevard), which already requires mitigation (including removal of on-street parking) due to significant impacts to the level of service. Because of the built-out conditions along those roadways, there is little opportunity for additional improvements without physically removing or affecting some businesses. Under the existing localized congested traffic conditions, the consolidation of trips from four points to three points is not a feasible solution as this would simply shift, and most probably exacerbate and increase, the impact from one intersection to several others. The issue of traffic congestion and mitigation on Robertson Boulevard and Alden Drive-Gracie Allen Drive is further discussed in Response 9-4 to a comment provided by the Robertson Community Association.

Response 7-4

The commentor requests that secondary impacts (i.e., impacts to surrounding businesses) due to implementation of mitigation proposed for Intersection No. 2 be discussed in the Final SEIR. As pointed out by the commentor, however, secondary impacts are already discussed on pages 215, 216, 232 and 233 of the Draft SEIR. On page 215, the Draft SEIR concludes that a reduction in sidewalk width would have a less than significant impact on pedestrians and patrons to adjacent/local businesses; hence, further discussion is not necessary. On page 233, the Draft SEIR concludes that a reduction in on-street parking may result in a significant adverse impact to local businesses along Robertson Boulevard and Beverly Boulevard whose patrons depend on the on-street parking.

Furthermore, on pages 232 and 233, the Draft SEIR indicates that the reduction in on-street parking spaces was previously considered in the Original EIR and the impact was determined to be significant. Because the Draft SEIR focuses on the "net increase" of an additional 100 new inpatient beds and ancillary services (or the equivalent of 200,000 square feet of floor area), the incremental impact to local businesses is stated in comparison to the analysis of the Master Plan in the Original EIR. As such, and as noted on page 233, the adverse effects of the Project to surrounding businesses are not anticipated to be incrementally substantial beyond the impacts found for the Master Plan in the Original EIR, which were already determined to be significant.

CEQA Guidelines Section 15126.4(a)(1)(D) states that if a mitigation measure would cause a significant effect, in addition to those caused by the project, then the (secondary) effects of the mitigation measure should be discussed and can be done so in less detail than as for project effects. The secondary impacts are adequately addressed in both the Draft SEIR and the Original EIR, which clearly state that local businesses will be impacted by the reduction of on-street parking and reduction of sidewalk width. A Statement of Overriding Considerations was previously adopted for the Original EIR that incorporated significant impacts due to implementation of the mitigation measures that would reduce on-street parking. As such, the SEIR has met the intent of Section 15126.4 and adequately addressed secondary impacts to local businesses.

Furthermore, direct physical impacts to the businesses are not anticipated as the implementation of the mitigation measures would not require that any business be moved or relocated. The mitigation measure improvements would be completed within the existing City right-of-way and would not encroach into properties of surrounding businesses. Construction activities for the mitigation measures are not anticipated to be extended for more than a 2-week time period; thus, surrounding businesses would not be required to close due to these improvement activities. Consistent with CEQA Guidelines Section 15131, economic and social effects are not required to be addressed in an EIR. Without more specific information and/or evidence for consideration, it is unclear what additional analysis the commentor would expect to see included.

Response 7-5

The commentor reiterates a request for the consideration of a Project design that would relocate the Project entrance and suggests that the Draft SEIR be recirculated with additional information relative to revised traffic information, an alternate Project design, and discussion of secondary impacts due to implementation of Project mitigation measures. As discussed in Responses 7-2, 7-3, and 7-4, information presented in those responses does not change the conclusions previously reached or present significant new information that would warrant recirculation of the Draft SEIR.

CEQA Guidelines Section 15088.5 outlines the circumstances under which an EIR would be required to be recirculated. Specifically, this section clarifies that an EIR need only be recirculated when "significant" new information has been added to the EIR that was previously circulated, and that failure to recirculate with the new information would deprive the public of a meaningful opportunity to comment on a project and/or its significant effects. Recirculation is not required when new information merely clarifies or amplifies information already provided.

Because the information provided in these responses to comments does not present significant new information, nor change any of the conclusions previously reached in the Draft SEIR, recirculation of the Draft SEIR is not required.

COMMENT LETTER #8

LAKE & LAKE
Consulting, Inc.
Strategic Research

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

October 18, 2008

Adam Villani, Environmental Review Coordinator
LA Dept. Of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RE: COMMENTS ON CEDARS DEIS (ENV 2008-0620-EIR)

Dear Mr. Villani:

Thank you for the opportunity to comment on this DEIS. My comments are in behalf of my client, Burton Way Foundation and incorporate by reference all other comments.

There are three areas of concern: evidence of infrastructure adequacy, parking and compliance with the Wilshire Community Plan.

INFRASTRUCTURE ADEQUACY

In my scoping comments I raised the question of how the city can certify that its infrastructure is adequate to accommodate a project and related projects when no such study has been prepared in ten years. I could not find a reply to this question. **1**

In the absence of such a study, how can the Planning Department assure the deicisonmakers (the City Council) that there is adequate infrastructure? Since CEQA decisions must be based on the evidence in the record, the absence of such evidence is of concern.

PARKING

1. Have parking requirements increased since the 1993 Masterplan and have any such changes been included, i.e., at the completion of the project would the campus meet current parking requirements for old and new elements? **2**

2. Page 228 includes 1654 spaces in the privately-owned two Medical Tower office buildings as part of the Cedars parking supply. These spaces were required for those buildings, not Cedars. Further, some of these spaces are also leased to Third Street restaurants. What allows Cedars to count these already-committed spaces as theirs? Is there a shared parking agreement? Normally such arrangements work for complementary, not competing users. Please provide documentation that the spaces Cedars claims are exclusively theirs. **3**

COMMENT LETTER #8
CONTINUED

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WILSHIRE COMMUNITY PLAN

1. The traffic analysis relies on thresholds of significance utilized by LADOT. However, these do not correspond with the Community Plan's policies 16.1 and 16.2. This creates several significant challenges:

   A. Policy 16.1-1:. Rather than relying on a threshold based on a percentage increase over current traffic, it imposes an absolute standard of adequate service, LOS D or better. It then asks what the current Level of Service is on major streets and highways serving the site. The FEIS must evaluate the current LOS and future LOS within this framework in addition to DOT's standard thresholds of significance. **4**

   B. The DEIS totally fails to discuss compliance with Policy 16.2-1 and Programs of the Wilshire Community Plan: This was specifically requested on page two of my scoping comments of April 2, 2008 (attached). **5**

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

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

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

   Looking at the LOS tables for this particular project, it would appear that the finding cannot be made that there is adequate capacity. Therefore, the DEIS must utilize the statement of overriding considerations.

   Given the importance of the services that Cedars provides to our community such a statement should be readily approved by the City Council. Avoiding this requirement of the Community Plan, however, is unacceptable.

COMMENT LETTER #8
CONTINUED

LAKE & LAKE
Consulting, Inc.
Strategic Research

I look forward to your responses in the FEIS and am available to discuss these issues.

Sincerely,

Laura Lake

Laura Lake, Ph.D.

Cc: Burton Way Foundation
Lisa Trifiletti, CD5
Gail Goldberg, Director of Planning

Attachment: Lake and Lake Scoping Comments, April 2, 2008

COMMENT LETTER #8
CONTINUED

LAKE & LAKE
Consulting, Inc.
Strategic Research

Laura Lake, Ph.D.
President
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laura.lake@gmail.com
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April 2, 2008

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

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

Dear Mr. Villani:

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

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

Parking:

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

Liquefaction:

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

Compliance with the General Plan:

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

6

COMMENT LETTER #8
CONTINUED

LAKE & LAKE
Consulting, Inc.
Strategic Research

6

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

Compliance with the Wilshire Community Plan:

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

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

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

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

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

_____WILSHIRE_____
III-37
The transportation infrastructure serving the project site and surrounding area, specifically the Freeways, Highways, and Streets presently serving the affected area within the Wilshire Community Plan, have adequate capacity to accommodate the existing traffic flow volumes, and any additional traffic volume which would be generated from projects enabled by such discretionary actions.

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

COMMENT LETTER #8
CONTINUED

LAKE & LAKE
Consulting, Inc.
Strategic Research

Analyze Cut-Through Traffic

Also, please analyze the impacts of additional project related and cumulative traffic on adjacent residential streets (spillover/cut-through traffic). 6

Thank you for your consideration in advance.

Sincerely yours,

Laura Lake

Laura Lake, Ph.D.
President

cc: Lisa Trifiletti, CD5
Jeff Haber, Esq.
Harald R. Hahn, Burton Way Foundation

Page -3-

IV. COMMENT LETTERS AND RESPONSES TO COMMENTS

H. COMMENT LETTER NO. 8

Laura Lake, Ph.D.
Lake & Lake Consulting
1557 Westwood Boulevard #235
Los Angeles, CA 90024
October 18, 2008 (with attachment dated April 2, 2008)

On behalf of Burton Way Foundation

Response 8-1

The commentor makes reference to the City's "infrastructure adequacy" without any specific comment. The Initial Study for this Project, (contained in *Appendix A* to the Draft SEIR), assessed potential impacts to the water, wastewater, storm water, solid waste, communications, power, and natural gas infrastructure. The Initial Study also assessed potential impacts to the police, fire, school, and park services, which are sometimes described as part of the City's infrastructure. The Draft SEIR contains a detailed assessment of potential impacts to the transportation system of the City (see *Section IV.D: Transportation and Circulation*, pages 157-245 of the Draft SEIR), which may also be considered part of the City's infrastructure. Without specifics from the commentor as to which aspect(s) of the City's infrastructure are of concern, it is not possible to further address the adequacy of the analysis or determine if the conclusions would otherwise change. Additionally, it should be noted that a recent gauging of the sewer line capacities in the Project area, by the Bureau of Sanitation, indicated that the sewer line serving the Project Site is currently operating at 45% of capacity (see Comment Letter/Response Nos. 1-1 and 2-2), which validates the determination of the Initial Study regarding potential impacts to the wastewater system. Therefore, the information contained in the Initial Study and the Draft SEIR provide substantial information and evidence that the Project will not significantly impact the infrastructure of the City.

Response 8-2

Parking requirements for hospital, medical office, and research uses have not increased since the Master Plan approval in 1993. The 1993 Cedars-Sinai Master Plan imposed a specific parking requirement for the CSMC Campus. As identified on Pages 227 and 228 of the Draft SEIR, these requirements are as follows: 3.3 parking spaces per 1,000 square feet of Administration, Diagnostic, Imaging and Support uses; 2.5 parking spaces per hospital bed; and 5.0 parking spaces per 1,000 square feet (sf) of Medical Suites. Under the Los Angeles Zoning Code, Section 12.24A.4(d), hospitals are only required to provide 2.0 spaces per bed for all hospital/inpatient space without delineation for specific hospital uses. The Zoning Code does not contain distinctions between various inpatient-related uses including patient space, administration, and hospital support uses, as well as any diagnostic and imaging space that is used for inpatient care. Under the 1993 Master Plan, however, a substantial portion of hospital/inpatient space that would typically be included as part of the 2.0 spaces per bed

requirement, must be calculated separately at higher parking rates (e.g., 3.3 per 1,000 sf and 2.5 per bed). As a result, support, administration and diagnostic space devoted to inpatient care that would not otherwise be accounted for under the Code provisions must be counted separately under the Master Plan. The Original EIR indicates that the total parking required and proposed under the Original EIR and Master Plan would exceed City Code requirements by 197 spaces (i.e., 7,053 spaces per the Master Plan vs. 6,856 per the City Code). As identified on pages 230-232 of the Draft SEIR, the proposed development under the revised Master Plan would also meet and exceed the City Code requirements by 89 spaces (i.e., 7,758 spaces per the Master Plan vs. 7,669 spaces per the City Code). Thus, at completion of the Project, the CSMC Campus would exceed the parking requirements of the Code for the old and new elements of the Master Plan.

Response 8-3

As indicated on page 228 of the Draft SEIR, the Medical Office Towers (MOTs) along Third Street, adjacent to CSMC, were authorized by Zoning Case No. 21332. This case is attached to this Final EIR in *Appendix H: Zoning Administrator Case 21332* (see Correction and Additions III.C.7 and III.E.9 of this Final SEIR). The findings of this case state that the main Hospital and MOTs have interrelated functions and that requiring separate parking for the two facilities would be duplicative and would create a hardship that would be inconsistent with the intent of the parking requirements of the Zoning Ordinance (see *Findings of Fact* 1 and 2). The commentor asserts that the MOTs and the main Hospital are competing, not complementary uses. Case No. 21332 shows, however, that there is a strong relationship between the two properties due to the fact that many of the doctors who regularly visit and utilize the main Hospital also have office space in the MOTs. The case found that these doctors generally do not move their cars from the MOT parking structures to the main Hospital parking structures and/or surface lots when crossing from one to the other, thus creating complementary uses between the two properties (see *Findings of Fact* 1 through 4). The complementary nature of these uses can be observed in the fact that, as mentioned in the commentor's letter, there are unused parking spaces available in the Medical Office Towers. It should be noted that the parking spaces in the MOTs are not being used to satisfy parking requirements for any other uses. Therefore, it was determined under this case that the parking demand and supply of the main Hospital and the MOTs shall be jointly calculated. As a result, as shown in *Table 33: Existing CSMC Campus Parking Summary* on Page 229 of the Draft SEIR, the combined requirements of the main Hospital and the MOTs are reflected in Item No. 1 under *Required Parking*. As also shown in *Table 33: Existing CSMC Campus Parking Summary*, the parking supplied by the main Hospital is reflected in Item No. 5 and the parking supplied by the Medical Office Towers is reflected in Item No. 7 under *Parking Supply*.

Response 8-4

The commentor asserts that Policy 16.1-1 of the Wilshire Community Plan "imposes an absolute standard of adequate service, LOS D or better." Policy 16.1-1 of the Community Plan, however, does not establish a standard of adequate service for the street system; rather, it identifies a desired level of operation for traffic flow. As such, this Policy represents a quality-of-life standard, not a definition of capacity.

As discussed in *Appendix B: CMA and Levels of Service Explanation, Proposed Project CMA Data Worksheets –AM and PM Peak Hours* to *Appendix E: Traffic Impact Study* of the Draft SEIR, intersection capacity is considered reached when a Critical Movement Analysis (CMA) or Volume-to-Capacity (*V/C*) value reaches 1.0. This is the dividing line between LOS E and LOS F. Any intersection operating at a V/C value of less than 1.0 means the intersection has not reached capacity. A review of Table 17 on page 132 of the Original EIR, as shown in *Table E: Original EIR, Table 17: Existing (1990) Level of Service Summary*, shows that 5 of the 18 intersections studied in 1990 operated beyond their theoretical capacity (*V/C* at 1.0 and LOS F). For example, in the Original EIR, the intersection of San Vicente Boulevard and Melrose Avenue operated at a *V/C* of 1.203. The actual capacity of a given intersection may be above the theoretical *V/C* value of 1.0.

TABLE E
ORIGINAL EIR, *TABLE 17: EXISTING (1990) LEVEL OF SERVICE SUMMARY*

INTERSECTION	AM PEAK HOUR		PM PEAK HOUR	
	V/C	LOS	V/C	LOS
San Vicente Boulevard/Melrose Avenue	0.816	D	1.203	F
Robertson Boulevard/Beverly Boulevard	0.960	E	0.998	E
San Vicente Boulevard/Beverly Boulevard	0.809	D	0.864	D
La Cienega Boulevard/Beverly Boulevard	0.969	E	1.103	F
Robertson Boulevard/Alden Drive	0.523	A	0.685	B
San Vicente Boulevard/Alden Drive	0.448	A	0.677	B
Robertson Boulevard/Third Street	0.768	C	0.910	E
George Bums Road/Third Street	0.495	A	0.529	A
Sherbourne Drive/Third Street	0.453	A	0.654	B
San Vicente Boulevard/Third Street	0.782	C	0.996	E
La Cienega Boulevard/Third Street	0.951	E	1.048	F
Orlando Avenue/Third Street	0.676	B	0.786	C
Robertson Boulevard/Burton Way	0.973	E	1.072	F
San Vicente Boulevard/Burton Way	0.373	A	0.502	A
San Vicente Boulevard/La Cienega Boulevard	0.650	B	0.968	E
Robertson Boulevard/Wilshire Boulevard	0.834	D	0.953	E
La Cienega Boulevard/Wilshire Boulevard	0.932	E	1.005	F
San Vicente Boulevard/Wilshire Boulevard	0.835	D	0.890	D

Therefore, the assertion that Policy 16.1-1 should be used as a threshold for evaluating traffic impacts in the SEIR is inappropriate because the SEIR is intended to perform a worst-case assessment of impact. As identified on page 176 of the Draft SEIR, the traffic assessment utilizes the existing traffic volumes, applies a growth factor for every year up to the build out year of the Project, and then adds the potential traffic for all known potential projects (Related Projects) in the study area. This methodology and the traffic generation forecast were approved by the LADOT in an Inter-Departmental Correspondence to the Department of City Planning, dated July 15, 2008 (see *Appendix F: Memorandum of Understanding and LADOT Approval* of the Traffic Impact Study included as Appendix E to the Draft SEIR). In many cases this assessment procedure over-estimates the future traffic conditions. For example, Table 21 on

page 152 of the Original EIR estimated that with ambient growth and the identified Related Projects, a total of 15 of the 18 intersections studied would operate at LOS F during the P.M. peak hour by year 2005. As identified in *Table 26: Summary of Volume to Capacity Ratios and Levels of Service* on Page 177 and 178 of the Draft SEIR, however, none of these 15 intersections are actually operating at LOS F today (in 2008). It should also be noted that in comparing the existing/current conditions between the Original EIR and SEIR (LOS and *V/C* in 1990 [depicted in Table 17 of the Original EIR] compared to LOS and *V/C* in 2008 [depicted in column 1 of *Table 26: Summary of Volume to Capacity Ratios and Levels of Service* in the Draft SEIR]) for 8 intersections within the City of Los Angeles operating at LOS E or F, all 8 intersections are operating with a better LOS and *V/C* today than they did in 1990. This suggests that the policies and programs implemented by the City since the adoption of the Wilshire Community Plan Update in 2001 have been consistent with, and have maintained, the intent of Policy 16-1.1.

Response 8-5

The commentor asserts that Policy 16.2-1 should have been analyzed in the Draft SEIR but was not. The Policy indicates, however, that it only applies to increases in density. Density refers to a permitted intensity of residential development, not commercial intensity. The importance of monitoring residential density, especially residential properties developed on commercial land uses, is elaborated in the Wilshire Community Plan. Specifically, as stated under the section entitled *Community Issues and Opportunities* on page I-5 of the Community Plan, "[n]on-conforming residential units exist in areas zoned and designated for commercial land use." Furthermore, in the section of the Community Plan entitled *Relationship to other General Plan Elements* on page II-4, it states, "plan capacity or buildout is an estimate and depends on specific assumptions about the future density of development and household size which may be greater or smaller than that which actually occurs. It should also be noted that the community plan capacity does not include housing in commercial districts nor does it adjust for the current residential vacancy rate." Similar statements do not exist regarding commercial intensity (or FAR) in the Plan area. It is evident that residential density is a major concern expressed in the Community Plan. As a result, increases in residential density within the Plan area are important and do justify additional review; however, the Project Site is a commercially zoned and used property and does not trigger policies and programs pertaining to residential density.

When read in the context of the entire Community Plan, Policy 16.2-1 refers to increases in density *beyond* that assumed for the Plan, not simply any increase resulting from changes in the zoning of a property that are within the limits prescribed by the Plan.

Similarly, even if Policy 16.2-1 is applied to commercially designated and/or commercially used property, such as the Project Site, the Project's proposed Zone Change would not increase the intensity of the site beyond that assumed under the Community Plan. The proposed Zone Change would increase the allowable square footage of the site from 2.27 million to 2.62 million; however, this is still less than the intensity permitted by the Plan, which designates the site as a Regional Commercial Center with a Height District 2 designation, permitting approximately 6.36 million square feet of development.

Despite the evidence that Policy 16.2-1 does not apply to this commercial Project, the commentor suggests that Policy 16.2-1 should be applied to the traffic analysis. As noted in this comment, Policy 16.2-1 requires that "the transportation infrastructure serving the project site and surrounding area. . . have adequate capacity to accommodate the existing traffic flow volumes, and any additional traffic volume which would be generated from such discretionary actions [i.e., the Project]." Thus, this Policy calls for an impact assessment of existing traffic and street capacity, plus the Project-related traffic. The Draft SEIR, on the other hand, goes beyond the Policy's impact assessment procedure and includes assessment of the existing traffic, plus conservative ambient growth, plus traffic from potential Related Projects, plus the Project-related traffic. To understand whether a project has the potential to exceed the theoretical capacity of an intersection per Policy 16.2-1 (Project-related traffic added to the existing traffic), one can add the Project-related *V/C* (shown in column 5 in *Table 26: Summary of Volume to Capacity Ratios and Levels of Service* of the Draft SEIR) to the existing *V/C* (shown in column 1 in *Table 26: Summary of Volume to Capacity Ratios and Levels of Service* of the Draft SEIR). Although this rough analysis does not account for all the intricacies of turning movements at an intersection, it does provide a reasonable rough approximation. This assessment procedure shows that none of the study intersections would degrade to a *V/C* of 1.0 or worse. An impact assessment accounting for all variation in turning movements for the 4 study intersections in the City of Los Angeles that currently operate at LOS D, E, or F is shown in *Table F: Policy 16.2-1 Impact Assessment –City of Los Angeles Intersections Operating at LOS D, E, or F*.

TABLE F
POLICY 16.2-1 IMPACT ASSESSMENT
CITY OF LOS ANGELES INTERSECTIONS OPERATING AT LOS D, E OR F

INTERSECTION	PEAK HOUR	[1] YEAR 2008 EXISTING V/C	[1] YEAR 2008 EXISTING LOS	[2] YEAR 2008 W/PROPOSED PROJECT V/C	[2] YEAR 2008 W/PROPOSED PROJECT LOS	CHANGE V/C [(2)-(1)]	SIGNIF. IMPACT
Robertson Boulevard/ Burton Way	A.M.	0.824	D	0.828	D	0.004	NO
	P.M.	0.872	D	0.879	D	0.007	NO
La Cienega Boulevard/ Beverly Boulevard	A.M.	0.882	D	0.891	D	0.009	NO
	P.M.	0.989	E	0.992	E	0.003	NO
La Cienega Boulevard/ Third Street	A.M.	0.825	D	0.830	D	0.005	NO
	P.M.	0.873	D	0.875	D	0.002	NO
La Cienega Boulevard/ San Vicente Boulevard	A.M.	0.822	D	0.825	D	0.003	NO
	P.M.	0.732	C	0.737	C	0.005	NO

This analysis, based on the application of the impact assessment procedure in Policy 16.2-1, confirms that the transportation infrastructure serving the Project Site and surrounding area has adequate capacity to accommodate the existing traffic flow volumes and any additional traffic volume that is generated by the Project enabled by the requested Zone Change, Height District Change, and Amendment to the existing Development Agreement. As shown in Table F, using

the worst study intersections currently operating at LOS D, E, or F within the City of Los Angeles and the impact assessment procedure enumerated in Policy 16.2-1 of the Community Plan (i.e., taking existing traffic *V/C* and LOS, and adding Project-related traffic to determine the impacts), these intersections would have less than significant impacts due to the Project, which is consistent with the findings in the Draft SEIR, *Section IV.D: Transportation and Circulation*.

Response 8-6

Issues raised in the commentor's response to the Notice of Preparation (dated April 2, 2008) were addressed in the Draft EIR. Specifically, issues related to parking, compliance with traffic/transportation-related Community Plan policies, and "cut-through" traffic are addressed in *Section IV.D: Transportation and Circulation* of the Draft SEIR and further explained through Responses 8-1 through 8-5 in this Final SEIR. Liquefaction is addressed on page 306 in *Section VI.A: Effects Not Found to be Significant* of the Draft SEIR. As noted in Response 8-1 above, infrastructure issues are discussed throughout several sections of the Draft SEIR.

COMMENT LETTER #9

ROBERTSON COMMUNITY ASSOCIATION
C/o R&L PROPERTIES
10940 WILSHIRE BOULEVARD, #2250
LOS ANGELES, CA

RECEIVED
CITY OF LOS ANGELES
OCT 16 2008
ENVIRONMENTAL UNIT

10/10/08

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7006 0100 0002 8470 5815

RE: Draft Environmental Impact Report
NO. ENV-2008-0620-EIR
(8720 Beverly Boulevard, Los Angeles, CA 90048)
Council District 5 – Jack Weiss

Mr. Villani:

Robertson Boulevard in the two blocks west of Cedars proposed 460,650sf tower has become the most successful retail street in the City of Los Angeles. Together with The Ivy and Chaya restaurants, the press refers to us as the new Rodeo Drive. 1

The Robertson business community is very concerned about the proposed Cedars tower, with some of the members objecting to the project as a whole. We understand that some members intend to oppose the project at the hearing. At a minimum for those who don't object to the project as a whole, they would surely expect Cedars-Sinai to formally reaffirm its past commitments to the Robertson Community Association to: 2

1. Be good neighbors to the Robertson business community, acting responsibly and with concern to all our merchants and restaurants. 3

2. Keep Cedars traffic, including construction traffic, away from Robertson Boulevard by directing it not to go westbound on Alden to Robertson and not to go eastbound on Alden from Robertson. 4

3. Have traffic personnel monitor full and continuing compliance with #2 above. 5

4. Keep construction noise and dust to a minimum, and regularly clean up any debris which would affect our business community. No construction after 5pm. 6 7

5. On a permanent basis, offer handicapped patients with state placards free Cedars parking, and have good signage to ensure that they know about it. Cedars handicap patients continually park in metered parking spaces on Robertson for free; the reason for this is clearly the result of Cedars charging handicap patients for parking. Cedars has taken advantage of this situation for years and this must stop. Cedars continuing to not address this past commitment has resulted in more and more of Robertson's limited street parking being used by hospital handicapped patients, costing our merchants business and costing the City of Los Angeles parking meter revenue. 8

In addition to implementing the above, we ask that Cedars offer free parking after 5PM and on weekends to valets parking cars for Robertson's businesses. 9

At minimum, Cedars must formally recommit to the above and follow through on these past commitments to our Robertson Community Association --- now, during construction of the proposed tower, and after the proposed tower is completed. 10

The Robertson Community Association and all of its owners and tenants have been good neighbors for many years; Cedars needs to act more responsibly and with concern for the area retailers during and after the proposed project. Thank you for your cooperation.

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COMMENT LETTER #9
CONTINUED

Please feel free to contact the undersigned with any questions; my office number is (310) 208-1800, Ext. 13. In the event you can't reach me, please call Mr. Phil Colman as listed below.

Sincerely,
ROBERTSON COMMUNITY ASSOCIATION

By: _____
ROBERT H. SCHWAB

Enclosure.

Cc:

Bruce Corwin (310)858-2810; email: mtcbruce@aol.com (w/Enclosure)
Metropolitan Theatres Corporation
8727 W. 3rd Street #301
Los Angeles, CA 90048

Bonnie Fuller (310)859-1925; email: bonnie@fulvest.com (w/Enclosure)
Fulvest Corporation
8727 W. 3rd Street #208
Los Angeles, CA 90048

Richard Irving
c/o Ann Parker (310)278-2908
The Ivy Restaurant
113 N. Robertson Blvd.
Los Angeles, CA 90048

Yuta Tsunoda (310)338-1122; email: yuta@thechaya.com (w/Enclosure)
Chaya Restaurant Group
100 Corporate Point #265
Culver City, CA 90230

Stuart Schneider (805)777-1177 (Chaya's attorney); email: schneider@ssicinc.com (w/Enclosure)
250 N. Westlake Boulevard
Suite 240
Thousand Oaks, CA 91362

Philip Colman (310)474-0555; email: phcolman@gmail.com (w/Enclosure)
10525 Garwood Place
Los Angeles, CA 90024

Lenore Winsberg (310)278-9111; email: lenore@winsberg.com (w/Enclosure)
101 S. Robertson Blvd.
Los Angeles, CA 90048

Don Epstein (310)275-1818; email: frogpond82@mac.com (w/Enclosure)
625 N. Palm Drive
Beverly Hills, CA 90210

Jay Luchs (310)489-5000; email:jay.luchs@cbre.com (w/Enclosure)
CB Richard Ellis
1840 Century Park East □ #700
Los Angeles, California 90067

Councilman Jack Weiss 310-289-0353 (w/Enclosure)
5th Council District Office
822 South Robertson Boulevard
Suite 102
Los Angeles, CA 90035

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IV. COMMENT LETTERS AND RESPONSES TO COMMENTS

I. COMMENT LETTER NO. 9

Robert H. Schwab
Robertson Community Association
10940 Wilshire Boulevard, #2250
Los Angeles, CA
October 10, 2008

Response 9-1

The commentor notes that additional comments and expressed opposition to the Project may be forthcoming. Unless written comments are received by the Lead Agency prior to the close of the public comment period (a total of 45 days, from September 11, 2008 to October 27, 2008), formal responses will not be provided. Furthermore, it should be noted that, pursuant to Section 15088 of the CEQA Guidelines, expressed opposition alone, without factual evidence to support specific claims, does not necessitate specific responses. Thus, the comment is noted.

Response 9-2

The commentor asserts that CSMC must "reaffirm" past formal commitments to the Robertson Community Association; however, the Applicant is not aware of any formal commitments between itself and the commentor that were made at the time of the Original Master Plan or since that time related to the obligations raised by the commentor. Further, the City of Los Angeles is not aware of any formal commitment binding the Applicant to any requirements agreed upon with the Robertson Community Association. The Applicant has committed to continue to resolve issues within the control of CSMC when identified by surrounding businesses.

Response 9-3

The commentor requests that CSMC continue to operate as a "good neighbor" within the Robertson business community. In defining a "good neighbor," the commentor suggests that CSMC embrace "good neighbor" polices that include a range of commitments, including reduced construction hours, free parking, and the provision of traffic control monitors. These specific requests are addressed individually in Responses 9-4 through 9-9 below; however, it can be generally stated that CSMC currently operates, and intends to continue to operate, in a manner that is, at a minimum, consistent with required City rules, regulations, and ordinances. To the extent that being a "good neighbor" specifically correlates with environmental impacts or that the Project operation may result in significant impacts not otherwise addressed through compliance with standard regulatory practice, mitigation measures are recommended in the SEIR. Because all impacts have been mitigated to the extent required and/or feasible, the good neighbor measures suggested by the commentor are not needed to reduce significant impacts.

Response 9-4

The commentor requests that traffic, including construction traffic, be directed away from Robertson Boulevard. In *Section IV.D: Transportation and Circulation* of the Draft SEIR, it was acknowledged that during the construction phase, local traffic may experience a temporary increase because additional construction-related trips (including commuting construction personnel and haul trucks) would be added to the area in addition to traffic generated by the existing uses. In response to traffic coordination issues during the construction phase, the Draft SEIR stated that 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. Provisions for this level of coordination, which will include coordination with local businesses, are made through Mitigation Measures (MM) TRF-1, TRF-14, TRF-15, TRF-22, and TRF-23. MM TRF-1 and TRF-23 have been modified in this Final SEIR (see Correction and Additions III.C.8 and III.C.9) to reinforce the level of construction phase coordination that will be required. 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 Plan and the City's approval of the haul routes.

It should be noted that, due to the intersection configuration at Robertson Boulevard and Alden Drive-Gracie Allen Drive, it is not anticipated that the large construction vehicles would utilize this intersection as part of a construction-phase traffic pattern. The commentor suggests, however, that all Project operational traffic should also be directed away from Robertson Boulevard. As a key arterial access to the Project area, it would be inappropriate to place access restrictions to Robertson Boulevard from CSMC. Such restrictions would undoubtedly add to congestion and decreased levels of service on the remaining surrounding roadways, and potentially encourage drivers to use surrounding residential neighborhood streets as alternative parallel routes. As the Draft SEIR incorporates adequate mitigation measures to address impacts to Roberson Boulevard, restrictions to this key local access are not necessary (see also Response 7-3).

Response 9-5

The commentor's recommendation that a traffic personnel monitor be used during construction has been incorporated into MM TRF-23 (see Correction and Additions III.A.4 and III.C.9). With regard to specifically having a monitor direct traffic away from Robertson Boulevard, see Response 9-4.

Response 9-6

The commentor requests that construction-related noise and dust be minimized and that the Project Site (and vicinity) be maintained free of debris. The commentor is directed to *Sections IV.B: Air Quality* and *IV.C: Noise* of the Draft SEIR which include detailed discussions of the air

quality and noise concerns anticipated during the construction phase of the Project, and which identify specific Mitigation Measures to minimize nuisance noise and dust.

For example, fugitive dust emissions would primarily result from demolition and site preparation (e.g., excavation) activities. It is mandatory for all construction projects in the South Coast Air Quality 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. Even with application of the best management practices, however, it is not possible to completely eliminate particulate matter emissions.

Similarly, all reasonable measures will be employed to minimize noise during the construction phase including, for example, hour limitations on construction, use of quieted construction equipment, and use of temporary noise barriers. See also *Section II: Summary* and/or *Section V: Mitigation Monitoring Program*, of this Final SEIR for a complete listing of all recommended air quality and noise mitigation measures.

Response 9-7

The commentor requests that construction activity noise be curtailed by 5:00 P.M. There is no evidence to show how this restriction on construction hours would further reduce construction noise impacts. Implementation of such a restriction, without a significant and measurable reduction in impacts, would be an undue hardship for the Project. If such a restriction were to be implemented, it is anticipated that the overall length of the construction period would extend beyond the 36 months analyzed in the Draft SEIR. For these reasons, consideration of reduced hours of construction activity is not considered a feasible option. CSMC will ensure that the construction activities of the Project will abide by the law.

Response 9-8

The commentor requests that CSMC provide free parking to visitors with handicapped vehicle placards with the assumption that this would encourage such visitors to park within the Campus rather than on City maintained/metered spaces, which offer free parking to vehicles with handicapped placards. CSMC provides parking at several locations throughout its Campus that are intended to accommodate a range of parking needs and conveniences. Through the provision of convenient parking and appropriate pedestrian access, CSMC anticipates that visitors will use these convenient Campus parking facilities in lieu of City maintained/metered spaces (e.g., along Robertson Boulevard) that may not be convenient to Campus buildings. Furthermore, unless the City removes these spaces as public spaces or installs signage and restricts the use of the spaces, the CSMC has no means to control who may or may not park in public parking spaces.

Response 9-9

The commentor requests that CSMC offer free parking for surrounding (non Medical Center) uses after 5:00 P.M. and on weekends. The adequacy of parking for other area uses is not a CEQA issue relevant to the Project. As demonstrated in *Section IV.D: Transportation and Circulation* of the Draft SEIR (pages 227-233), adequate parking is provided to serve both the West Tower Project and the CSMC Campus. The commentor suggests that CSMC should compensate for existing parking inadequacies in the area that are unrelated to the Project, as a "good neighbor" measure.

CSMC parking lots and structures remain full until 9:00 P.M. on most days of the week. Requiring free parking for off-site local businesses may result in a shortage of adequate Campus parking to accommodate the Project and the patients, visitors, and staff utilizing those parking spaces. The operational characteristics of CSMC necessitate that a portion of the facilities be open during weekends and evening hours; thus, if CSMC were to provide free parking for adjacent businesses after 5:00 P.M. and on weekends, it would be virtually impossible to limit the use of that parking to those using or visiting offsite businesses. Furthermore, as a self-insured, not-for-profit medical center that is not in the parking business, it is not appropriate for CSMC to be providing preferential free parking to those utilizing or visiting the surrounding businesses, especially if those parking spaces were being taken away from visitors and patients of CSMC.

Response 9-10

See Response 9-2 and Response 9-3.

COMMENT LETTER #10

Jerry Singer
P.O. Box 8400
Van Nuys, Ca. 91409

November 4, 2008

Mr. Adam Villani
Environmental Review Coordinator
Los Angeles Department of City Planning
200 North Spring Street
Los Angeles, Ca. 90012

Reference: Draft Environmental Impact Report
No. Env-2008-0620-EIR
8729 Beverly Boulevard, Los Angeles, 90048
Council District 5- Jack Weiss

By email to: Adam.Villani@lacity.org

Dear Mr. Villani:

As per our recent telephone conversation, I am addressing two of the issues we discussed that are extremely important to the two blocks on Robertson Blvd. between Beverly Blvd., and Third Street.

1. Parking: The parking rate that Cedars charges should be less than either our street parking on Robertson Blvd. and/ or our parking structure, owned by the City of Los Angeles, thus encouraging visitors to utilize Cedar's parking lots. To the best of my knowledge, and I will ask that someone investigates this further, Cedars is more expensive than our parking structure and our street parking. In addition, I am told that Cedars charges for handicap parking. This directs people with handicap placards to use the parking on the street which is primarily available for customers of our retail stores and restaurants. As soon as I have the results of this investigation, I will email it to you.

1

COMMENT LETTER #10
CONTINUED

2. My other concern is that all traffic created by this new structure be directed towards San Vincente Blvd., by making it impossible to travel West towards Robertson. **2**

Robertson Blvd., between Third Street and Beverly Blvd. has become the most successful new Retail area in the City of Los Angeles. In order for us to continue to grow and prosper, we need your help in addressing these issues.

Thank you,

Jerry Singer
Property owner on Robertson Blvd.

Phone 203 255-9283 Fax 203 255-9293
Email: hparsimoni@aol.com

IV. COMMENT LETTERS AND RESPONSES TO COMMENTS

I. COMMENT LETTER NO. 10

Jerry Singer
P.O. Box 8400
Van Nuys, CA 91409
November 4, 2008

Response 10-1

The commentor requests that parking rate fees at CSMC parking facilities be reduced as an incentive to encourage CSMC visitors to use those parking facilities rather than local street metered parking.

The CSMC provides a range of parking options and rates to address CSMC visitor needs. These parking options (identified at http://www.cedars-sinai.edu/5252.html and restated below) target short-term visitors, outpatient and office visitors, long-term visitors, and daily visitors.

Cedars-Sinai Medical Center Patients and Visitors - Parking

Self-Parking - Self-parking is available in Cedars-Sinai parking Lots 1, 2, 4 and 7 for $1.50 per 15 minutes; $10 maximum. Validated parking is $4.00 for outpatients only for all or part day. Parking Rates for Lots 1, 2, 4 and 7 are:

- $1.50 - Up to 15 minutes
- $3.00 - 16 to 30 minutes
- $4.50 - 31 to 45 minutes
- $6.00 - 46 to 60 minutes
- $7.50 - 61 to 75 minutes
- $9.00 - 76 to 90 minutes
- $10.00 - 91 to 105 minutes
- Lost ticket pays the $10 maximum fee

Restricted Parking - Parking in the Street Level of the South Tower, the Street Level of the Emergency Department (by the North Tower), and the Samuel Oschin Comprehensive Cancer Institute is restricted and is only open to patients who are being hospitalized or treated at these specific locations. Parking rates at these locations are $2.50 per 15 minutes; $15.00 maximum. Validated parking rate is $4.00 for all or part day. There is no charge to patients for parking in Lot 3 (Street Level South Tower) on the day of admission and the day of discharge. This area is located on Gracie Allen Street, just under the South Tower.

Metered Parking - Metered parking is available in the public parking lot, adjacent to Lot 8. Rates are $1 per hour and parking is limited to 4 hours maximum.

Long-Term Parking Passes – [For visitors who will] be at Cedars-Sinai Medical Center for more than five consecutive days, a weekly or biweekly parking pass [is available]. With this pass, [visitors] may come and go as often as [necessary] - for one low price. It may be used at Garages 1 and 4, and Lots 2 and 7. Long-term park rates (time/cost) as follows:

- 7 days - $30
- 14 days - $50
- 30 days - $99

Under the CSMC parking price structure, legitimate CSMC patients or visitors (i.e., those that purchase long-term parking passes and/or those who obtain parking validation) using CSMC-designated parking lots would pay between $4 - 6 for up to a full day of parking. Existing CSMC-designated parking lots and structures include Lots 1 (North Tower), 2 (Existing Lot at the Project Site), 4 (at Third Street/San Vicente Boulevard), and 7 (at Beverly Boulevard/San Vicente Boulevard). Short-term users (visitors or patrons at local businesses) that do not receive parking validation would pay a higher rate of $6 per hour up to $10 per day maximum. The CSMC-designated lots are located and priced to accommodate employees, staff, inpatients, outpatients, and long-term visitors; however, other users may also utilize the lots for a slightly increased cost. Additional public parking (as well as employee parking) is available in Lot 8 (located at Third Street/George Burns Road), which offers metered parking at a rate of $1 per hour with a four-hour maximum, to serve short-term CSMC visitors and the general public. Hourly parking at the meters can be pro-rated at fifteen-minute intervals (i.e., 25 cents per each 15 minutes). With the four-hour limitation, parking in the metered lot could cost a maximum of $4 per one-half day of parking (or the equivalent of $8 per day).

On July 16, 2008, the Los Angeles City Council voted to increase parking meter rates and extend the hours of operation. Under the approval, hourly rates increased to $1 an hour at most locations City-wide. Certain high usage areas (e.g., downtown Civic Center) increased to $4 an hour, while other popular "destination" areas, including the Robertson/Alden area, increased to $2 an hour. Parking time limits remain a maximum of two hours. Hence, on-street metered parking in the Roberson/Alden area (west of the Project Site) currently costs $4 for a two-hour limited period.

Parking rates charged at CSMC-operated parking facilities appear appropriately priced to create an incentive for CSMC visitors to use those facilities. A survey of parking rates for other parking facilities in the area show the following: the Pacific Theaters building is $2.25 every 15 mintues with a maximum rate of $17.50 ($7.50 more than CSMC); the Third Street Medical Office Towers are $1.95 every 15 minutes with a maximum rate of $13.65 ($3.65 more than CSMC); and the Beverly Center is $1.00 per hour with a maximum rate of $10.00 (equal to CSMC). Furthermore, the CSMC-operated parking facilities are more conveniently located to serve CSMC visitors and offer longer parking duration limits than on-street parking spaces. For example, an outpatient or visitor attending an approximate two-hour appointment and obtains parking validation would pay $4 to park on the CSMC Campus. Parking would generally be available and within close proximity to their appointment location in a variety of lot locations. Also, unless parked at a metered space in Lot 8, there would be no penalty if the appointment

lasted longer than two hours. Conversely, a visitor desiring to use on-street parking along Robertson Boulevard may need to "circle" the street in search for an open metered space and have confidence that her or his appointment would be complete in under two hours. He or she would also pay $4 to park and would risk a costly parking ticket if the appointment ran late. Visitors may also be required to walk a longer distance to their appointment destination.

With regard to special circumstances for drivers displaying a handicap placard, please see Response 9-8 for further information. It should be noted that handicap parking is also time-restricted in metered street spaces and the on-street parking spaces would most likely be a greater distance to their appointment destination on the CSMC Campus.

Once the Project is constructed, an additional 500 parking spaces will be made available within the CSMC Campus and within close and convenient proximity to CSMC services.

Given the information and comparison above, there is no evidence to support the commentor's claim that CSMC parking rates are more expensive than on-street parking rates, and/or that the pricing discourages CSMC patrons from parking within the Campus.

Response 10-2

See Response 7-3, Response 7-4, Response 9-4, and Response 9-8. Limiting all traffic solely to San Vicente Boulevard would further exacerbate the impacts discussed in the previous responses.