

I. INTRODUCTION

A. ENVIRONMENTAL REVIEW PROCESS

1. OVERVIEW OF THE CEQA PROCESS

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

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

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

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

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

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

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

2. PROJECT EIR PROCESS

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

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

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

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

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

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

3. PROJECT APPROVAL AND INTENDED USES OF THIS EIR

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

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

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

4. INITIAL STUDY AND NOTICE OF PREPARATION

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

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

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

Federal and State Agencies

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

Regional, County, and Local Agencies

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

Organizations and Special Interest Groups

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

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

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

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

5. REVIEW OF THE DRAFT SEIR

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

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

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

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

I. INTRODUCTION

B. RELATIONSHIP TO PREVIOUS EIR

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

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

In accordance with CEQA Section 21166 and CEQA Guidelines Sections 15162 and 15163, the City considered whether the Project's proposed amendment to the approved Master Plan would (1) require major revisions to the Original EIR, because the Project would create either new significant environmental impacts not previously studied in the Original EIR or a substantial increase in the severity of any significant impact previously identified in the Original EIR;(2) substantially change the circumstances under which the Master Plan is undertaken so as to require major revisions of the Original EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;(3) bring to light new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Original EIR was certified as complete, meeting the test of CEQA Guidelines Section 15162(a)(3).

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

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

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

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

I. INTRODUCTION

C. ORGANIZATION OF THIS SEIR

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

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

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

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

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

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

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

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

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

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