

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

A. EFFECTS NOT FOUND TO BE SIGNIFICANT

An Initial Study (“IS”) was prepared for the Project. Pursuant to CEQA Guidelines Section 15063, the IS for the Project was used to: 1) provide the Lead Agency with information for deciding whether to prepare and EIR; 2) assist in the preparation of an EIR by focusing the EIR on effects determined to be potentially significant, identifying effects determined not to be significant, and explaining the reasons for those determinations; 3) identify what type of EIR (i.e., Supplemental EIR) process would be appropriate; and 4) determine whether a previously prepared EIR could be used to support the Project.

The City of Los Angeles determined that the preparation of a Supplemental EIR was appropriate for the Project; thus, consistent with those provisions, and in accordance with CEQA Guidelines Sections 15162 and 15163, the IS considered whether the Project’s proposed revisions to the approved Master Plan would: 1) require major revisions to the Original EIR, because the Project would create either new significant environmental impacts not previously studied in the Original EIR or a substantial increase in the severity of any significant impact previously identified in the Original EIR; or 2) substantially change the circumstances under which the Master Plan is undertaken so as to require major revisions of the Original EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or 3) whether new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Original EIR was certified as complete, meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

Based on the IS and Notice of Preparation (“NOP”) process, it was determined that implementation of the Project may, by itself and/or in conjunction with past, present and reasonably foreseeable future development in the Project vicinity, have a significant environmental effect in the following areas: Aesthetics/Visual Resources, Air Quality, Noise, Traffic/Circulation/Access and Cumulative Effects. This SEIR analyzes these potential environmental impacts and recommends additional feasible mitigation measures to reduce impacts found likely to be significant.

In accordance with CEQA Guidelines Section 15128, other possible effects of the Project, which were determined to not be significant through the IS review and NOP scoping process, are not discussed in detail in this SEIR. Those possible effects which did not warrant detailed analysis are identified below. The specific issues, as defined by the IS checklist questions or *L.A. CEQA Thresholds Guide* (“*Thresholds Guide*”) screening criteria¹, are identified, followed by the impact analysis.

¹ City of Los Angeles, Dept. of Environmental Affairs. *L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles*. 2006

Aesthetics (Views, Scenic, Shade/Shadow)

The Project will not:

- Have a substantial adverse effect on a scenic vista.
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway.
- Include light-blocking structures in excess of 60 feet in height above the ground elevation that would be located within a distance of three times the height of the proposed structure to a shadow-sensitive use on the north, northwest or northeast.

The Original EIR determined that the Master Plan would have less than significant project-level impacts on aesthetic (including visual character, artificial light, and shade/shadow), but that it would have direct and indirect cumulative impacts on views and with respect to illumination and shadows. However, all impacts related to aesthetics were reduced to less than significant through mitigation measures adopted from the Original EIR. The Project would create no new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to views, scenic vistas or shade/shadows.

The Project Site is located in the densely developed Wilshire District of the City of Los Angeles and specifically in the Beverly Center-Cedars Sinai Regional Commercial Center. This area contains a mix of medical, commercial and retail uses with buildings of various sizes and architectural designs. The Project Site is not located near any scenic corridor or scenic highway. According to the Wilshire Community Plan, the Project Site is not located within a scenic viewshed.

Development of the Project may increase the visibility of the Project Site due to increased building height and bulk compared to that of existing development and/or implementation of the remaining Master Plan development. However, visibility of the Project Site would remain limited because off-site views of the Project Site are already obstructed by surrounding development.

The Project Site is currently developed with the two-story Existing Building and adjacent Existing Parking Lot. Primary views of the Project Site in the immediate area are internal views from the CSMC Campus at Gracie Allen Drive and George Burns Road. Views of the Project Site from Beverly Boulevard or Robertson Boulevard are fully or partially obstructed by adjacent buildings. Vegetation on the Project Site consists of landscaping associated with the existing CSMC Campus. The Project would not result in the removal of a valued aesthetic feature. The Existing Building is not designated as and is not a valued aesthetic feature, and existing views of the Project Site are limited from the main thoroughfares.

The Project would introduce light-blocking structures, but (as was demonstrated in the Original EIR) would not affect any shadow-sensitive use(s) that would be located within a distance of three times the height of the West Tower and parking structure to the north, northwest or northeast. A maximum shadow of 545 feet (a length just under the 3:1 height ratio) would be cast from the proposed 185-foot West Tower during the winter solstice at 9:00 A.M. and 3:00

P.M. During the morning hours, the shadow would affect the center of the CSMC Campus, Sherbourne Drive, and Gracie Allen Drive. The shadow would affect the Beverly Center and San Vicente Boulevard during afternoon hours. During the spring and fall equinoxes, a maximum shadow length of 395 feet would be cast from the West Tower between 8:00 A.M. and 4:00 P.M. During morning hours, the shadow would cover portions of the CSMC Campus and Sherbourne Drive. In the afternoon, the shadow would cover a portion of the Beverly Center and San Vicente Boulevard. In summary, the shadows from the Project would be less than three times its height and would be cast on commercial, CSMC, and/or street uses, not on shadow-sensitive uses. Therefore, the Project is not anticipated to result in significant impacts to shade/shadow conditions.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts on short-range views, scenic resources or shade/shadow-sensitive uses not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

The potential significance of the Project's impacts related to visual character, long-range views and lighting is addressed in *Section IV: Environmental Impact Analysis: A-Aesthetics*.

Agriculture

The Project will not:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland to non-agricultural use.

The Project involves construction within a developed urban area. The Farmland Mapping and Monitoring Program (State Department of Conservation, 2002) does not identify any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance at the Project Site. The Project Site is not protected by a Williamson Act Contract. Therefore, as the Project will not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use or conflict with existing agricultural zoning or protected land, no impacts would be expected. Therefore, the Project is not anticipated to result in significant impacts to agricultural resources and would not require further evaluation.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no environmental impacts on agricultural resources, no substantial changes with respect to the circumstances under which the Project is

undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

Biological Resources

The Project will not:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The Original EIR determined that the Master Plan would have less than significant impacts on biological resources (both animal and plant life). Given that the CSMC Campus was and remains in a highly urbanized area, conditions related to biological resources have not changed. The Project would create no new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to biological resources.

The Project Site and the surrounding area is urbanized and developed with a range of moderate intensity commercial, medical services and residential uses. Vegetation at the Project Site is limited to landscaping associated with existing development. Proposed new facilities are associated with the existing urban development. There are no natural habitats on or near the Project Site.

Using *Thresholds Guide* screening criteria, it was determined that the Project would have no impact on biological resources. The Project Site does not include or is near natural open space or a natural water source, and no sensitive species are known to use or inhabit the site.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no environmental impacts on biological resources not previously analyzed in the Original EIR, no substantial increase in the severity of

any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

Cultural Resources

The Project will not:

- Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Disturb any human remains, including those interred outside of formal cemeteries.

The Original EIR determined that the Master Plan would have less than significant impacts on cultural resources, including archeological, paleontological and historical resources. Because the potential for cultural resources within the Project Site were anticipated, no mitigation measures were required per the Original EIR. The Project would create no new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to cultural resources.

The Project Site has been previously disturbed and is currently covered with medical facilities. No historic, archaeological, or paleontological sites or resources were identified in a search of pertinent records, maps, and literature, including the National Register of Historic Places and the California Historical Landmarks.

Using *Thresholds Guide* screening criteria, it was determined that the Project would have no impact on cultural resources, since the Project does not occur in an area with known archaeological resources, archaeological study area, or fossil site. Further, the City of Los Angeles has adopted standard conditions that require that the grading and excavation activities be monitored for evidence of significant cultural resources. These standard conditions were implemented into Ordinance No. 168,847 for all grading at the CSMC Campus and will apply to the proposed Project.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no environmental impacts on cultural (including archeological, paleontological and historical) resources not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

Geology and Soils

The Project will not:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault,
 - Strong seismic ground shaking,
 - Seismic-related ground failure, including liquefaction,
 - Landslides.
- Result in substantial soil erosion or the loss of topsoil.
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Proposed Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.
- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

The Original EIR determined that the Master Plan would have less than significant impacts with respect to geology and soils (including grading, geologic hazards, seismicity, soil stability and contaminated soils). However, any impacts that did exist related to geology and soils were further reduced through mitigation measures adopted from the Original EIR. The Project would create no new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to geology and soils.

Seismic Ground Shaking - Several active fault zones are known to exist in the Los Angeles region, which could produce strong groundshaking in the Project area. The seismically active faults nearest to the Project Site include: 1) the Inglewood branch of the Newport-Inglewood fault zone, approximately 1.3 miles southwest, 2) the Raymond Fault, approximately 10.5 miles east, 3) the Malibu Coast Fault, approximately 13 miles west-southwest, and 4) the San Fernando fault, approximately 14 miles north of the Project Site.

No known faults considered active are found on or adjacent to the Project Site. Although the potentially active Santa Monica fault is believed to traverse the existing CSMC Campus, the fault is not believed to traverse the Project Site. The fault trends east-west to east-northeast across the existing CSMC Campus and has been identified as extending through the intersection of San Vicente Boulevard and Beverly Boulevard.

As in other areas of the Los Angeles region, the Project Site may be subject to potential groundshaking from earthquakes along active and potentially active faults in the Los Angeles area. Project design and construction procedure would involve consideration of seismic design parameters in accordance with standard engineering practice and uniform codes.

Using *Thresholds Guide* screening criteria, it was determined that the Project Site is not designated on official maps and databases or from past episodes as susceptible to unusual geologic hazards, and the Project would not involve the placement of structures on fill or involve the extraction of mineral resources, groundwater, oil or natural gas. Further, adherence to the Building Code and the Los Angeles Seismic Safety Plan would ensure that potential seismic risks would be reduced to a level of less than significant. Therefore, the impacts associated with seismic ground shaking are less than significant and do not require further evaluation.

Seismic-related ground failure, including liquefaction - The potential for liquefaction has been found to be greatest where the groundwater level is shallow and loose and fine sands occur within a depth of approximately 50 feet or less. Liquefaction potential decreases with increasing grain size and clay and gravel content. Groundwater levels in the Project Site area range from approximately seven to 20 feet below grade. Soils existing beneath the site at levels below the groundwater surface consist primarily of clay, and to a lesser extent, sands, silty sands, and silts. The sands beneath the site are dense and are not considered susceptible to liquefactions. Also, due to the dense nature of the granular soils encountered beneath the Project Site, the potential for seismically-induced differential settlement is considered very low. Project design and construction procedure involves consideration of seismic design parameters in accordance with standard engineering practice and building codes.

Using *Thresholds Guide* screening criteria, it was determined that the Project Site is not susceptible to unusual geologic hazards due to the physical properties of the site. Further, adherence to the Building Code and the Los Angeles Seismic Safety Plan would ensure that potential seismic risks would be reduced to a level of less than significant. Therefore, the impacts associated with seismic-related ground failure are less than significant and do not require further evaluation.

Landslides - The Project Site and surrounding area are essentially flat and are not adjacent to any hillside area. Therefore, the Project is not anticipated to result in significant impacts associated with seismic-induced landslides and would not require further evaluation.

Soil erosion or the loss of topsoil - The Project Site is currently developed and essentially flat. Implementation of the Project would involve excavations for subterranean parking and basement structures. The facility design for the Project would involve use of registered professionals as appropriate to ensure that facility design and construction results in stable earth conditions. Further, the earthwork and surface condition changes would be evaluated as part of the building permit process. Standard practices incorporate techniques appropriate to the situation as described in the California Storm Water Best Management Practice Handbook for Construction Activity, or other techniques of equivalent effectiveness to address erosion potential. Standard procedure includes compliance with South Coast Air Quality Management District guidance related to minimization of wind erosion and incorporation of best management practices for water erosion control in Project construction.

Using *Thresholds Guide* screening criteria, it was determined that the Project does not involve grading on a slope of ten percent or more, and does not involve grading, clearing, or excavation

activities in an area of known or suspected erosion hazard. Because the Project would not result in a substantial change to conditions previously considered, the potential impacts noted above would remain less than significant and further analysis is not required.

Unstable Soil – Based on the conclusions of the Original EIR (and the accompanying Geotechnical Evaluation²), unstable soil is not known to be a potential issue on the Project Site. Standard procedure for facility design involves use of registered professionals as appropriate to ensure that facility design and construction results in stable earth conditions. Therefore, the Project is not anticipated to result in significant impacts associated with substantial soil erosion and would not require further evaluation.

Expansive Soil – Based on the conclusions of the Original EIR, expansive soil is not known to be an issue on the CMSC Campus. If expansive soils were encountered during site improvement, the soil and colluvium materials would probably require removal and replacement with engineered fill materials. Standard practice for facility design involves use of registered professionals as appropriate to ensure that facility design and construction results in stable earth conditions. Because of these standard precautions and procedures, the Project is not anticipated to result in significant impacts associated with expansive soil and does not require further evaluation.

Alternative Wastewater Disposal Systems - Wastewater from the Project Site is currently treated at the Hyperion Treatment Plant. The Project does not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project is not anticipated to result in significant impacts associated with the use of septic tanks or alternative wastewater disposal systems and would not require further evaluation.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts with respect to geology and soils not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

Hazards and Hazardous Materials

The Project will not:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment

² *Report of Geotechnical Evaluation for Environmental Impact, Cedars-Sinai Medical Center Master Plan*, prepared by Law/Crandall, Inc., April 16, 1991.

- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.
- Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, where the Proposed Project would result in a safety hazard for people residing or working in the Project area.
- Be within the vicinity of a private airstrip, where the proposed Project would result in a safety hazard for people residing or working in the Project area.
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

The Original EIR determined that the Master Plan would have less than significant impacts with respect to hazards and hazardous materials; however, the Original EIR determined that the Master Plan would have significant and unavoidable project-level and cumulative impacts due to the increase in use of hazardous materials, generation of hazardous wastes, and the increased transport/disposal of hazardous materials. Mitigation measures adopted per the Original EIR would reduce these impacts, but not to less than significant levels. Nonetheless, the Original EIR concluded that continued compliance with applicable federal, state, and local laws would reduce the risk associated with hazardous substances to acceptable levels. These significant unavoidable adverse impacts were accepted through the adoption of a Statement of Overriding Considerations. The Project would create no new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to hazards, hazardous wastes and hazardous materials.

Hazardous Materials - The Applicant currently uses and stores liquids and gases that are flammable or combustible at the CSMC Campus. The 1989 CSMC Business Plan requires biennial reporting of hazardous materials inventory changes and updates to the Los Angeles Fire Department prior to the issuance of a Certificate of Occupancy for expansions of existing facilities.

In order to minimize health risks to employees and to the residents of the surrounding area, the CSMC places quarterly announcements in a local newspaper identifying that hazardous materials are used and stored on site, trains staff in the use and proper handling of hazardous materials, posts notices on site identifying the site contains hazardous materials, and disposes of hazardous materials properly. The Fire Department has determined that the CSMC is not required to file a Risk Management Prevention Plan, due to the quantities and concentrations of substances used on site.

Using *Thresholds Guide* screening criteria, it was determined that the Project would involve the use and storage of toxic, readily combustible, or otherwise hazardous materials; however, the CSMC would update its Business Plan prior to obtaining a Certificate of Occupancy for the Project. Conformance with all applicable laws and regulations and the implementation of all

applicable CSMC safety policies and procedures is considered part of the Project. In addition, the Project would not use or manage hazardous substances in sufficient quantities to cause potential hazard.

Because the Project would not result in a substantial change to conditions previously considered, the potential impacts associated with the use of hazardous materials noted above would remain less than significant and further analysis is not required.

Airport Safety - The Project Site is not located within an airport land use plan or is within two miles of a public use airport, or in the vicinity of a private airstrip. Therefore, the Project is not anticipated to result in significant airport safety hazard impacts and would not require further evaluation.

Emergency Response Plans - The CSMC has a Disaster Response Plan on file with the City of Los Angeles. The Disaster Response Plan responds to a variety of emergency conditions, such as fire and seismic events as well as the release of chemical or hazardous materials. In the event of an emergency, the CSMC is required to notify the Fire Department. The Fire Department provides assistance in control of fire or hazardous material spills and determines whether evacuation of off site areas is necessary or appropriate. Any decision to evacuate off site areas is at the discretion of the Fire Department. Any such decision would conform to established evacuation procedures.

Using *Thresholds Guide* screening criteria, it was determined that the Project would require a revised risk management plan. The CSMC would update its Business Plan, which includes its Disaster Response Plan, prior to obtaining a Certificate of Occupancy for the Project. Conformance with all applicable laws and regulations and the implementation of all applicable CSMC safety policies and procedures is considered part of the Project.

Development of the Project may involve temporary lane closures or traffic detours but would not substantially affect area roadways or other significant transportation corridors. The Project would not involve any permanent changes in transportation corridors.

Because the Project would not result in a substantial change to conditions previously considered, the potential impacts associated with the emergency response plans noted above would remain less than significant and further analysis is not required.

Wildland Fires - The Project Site is located in a relatively flat, urbanized area. There are thirteen fire hydrants located on or adjacent to the CSMC. The hydrant locations include four hydrants on San Vicente Boulevard, two hydrants on Sherbourne Drive, three hydrants on Gracie Allen Drive, and four hydrants on George Burns Road.

Using *Thresholds Guide* screening criteria it was determined that the Project Site is not located in a brush fire hazard area, hillside, or area with inadequate fire hydrant service or street access.

Therefore, the Project is not anticipated to result in significant impacts associated with wildland fires and would not require further evaluation.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts with respect to hazards, hazardous wastes and hazardous materials not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

Hydrology and Water Quality

The Project will not:

- Violate any water quality standards or waste discharge requirements.
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site.
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site.
- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
- Otherwise substantially degrade water quality.
- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.
- Place within a 100-year flood hazard area structures that would impede or redirect flood flows.
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.
- Inundation by seiche, tsunami, or mudflow.

The Original EIR determined that the Master Plan would have less than significant impacts on hydrology and water quality. The Project would create no new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to hydrology and water quality.

Water Quality - The Project Site is within the Los Angeles Region (4) of the Regional Water Quality Control Board (the "RWQCB"). The City of Los Angeles is subject to the water quality regulations of the Los Angeles RWQCB. Under the authority of the Clean Water Act ("CWA"),

which prohibits the discharge of any pollutant to navigable waters from a point source unless a National Pollutant Discharge Elimination System (“NPDES”) permit authorizes the discharge, the Environmental Protection Agency (the “EPA”) publishes regulations establishing the “NPDES” permit application requirements for storm water discharges. As an agent of the State Water Resources Control Board the (the “SWRCB”), RWQCBs are authorized to implement a municipal storm water permitting programs as part of their NPDES authority. The SWRCB has issued general storm water discharge permits to cover industrial and construction activities, which are required for specific industry types based on standard industrial classification and construction activities on projects greater than 5,000 square feet. The general permits include: the “Statewide General Industrial Storm Water Permit” (addresses waste discharge requirements for discharges of storm water associated with industrial activities excluding construction activities); and, the “Statewide General Construction Storm Water Permit” (addresses waste discharge requirements for discharges of storm water runoff associated with construction activities).

The RWQCBs oversee implementation and enforcement of the general permits. Municipal permits typically require permittees to develop an area-wide storm water management plan, implement Best Management Practices (“BMPs”) and perform storm water monitoring. BMPs for the County of Los Angeles are identified in the documents supporting the County NPDES permits. On December 13, 2001, the Los Angeles RWQCB issued a municipal storm water NPDES permit (NPDES Permit No. CAS004001) to the County of Los Angeles and its co-permittees, which include the City of Los Angeles. Implementation of the Best Management Practices in accordance with the Development Best Management Practices Handbook (City of Los Angeles Department of Public Works, May 2002) would adequately protect the water quality during construction activities.

Using *Thresholds Guide* screening criteria, it was determined that, with implementation of BMPs, construction and operation of the Project would not involve point source discharges or nonpoint sources of contamination into a receiving water body.

Therefore, the Project is not anticipated to result in significant impacts associated with surface water quality and would not require further evaluation.

Groundwater - Potable water is currently supplied to the Project Site by the Los Angeles Department of Water and Power (the “LADWP”). Groundwater levels in the Project Site area range from approximately seven to 20 feet below grade. The Project Site is currently developed with no permeable area.

Using *Thresholds Guide* screening criteria it was determined that the Project would not include groundwater extraction for potable water supply purposes. Due to the shallow depth to groundwater, dewatering may be involved during excavation activities. Basement walls and floor slabs of the proposed subterranean structures would be either waterproofed and designed to withstand the potential hydrostatic pressure imposed on the structures by groundwater, or would utilize a continuous dewatering or subdrainage system. Such systems would be constructed following recommendations made by a licensed engineer prepared specifically for the

subterranean structures. It was further determined that the Project would not reduce any permeable area.

Therefore, the Project is not anticipated to result in significant impacts associated with ground water levels and would not require further evaluation.

Drainage – Runoff from the Project Site drains into existing city storm drains. Drainage facilities in the vicinity include catch basins in Gracie Allen Drive and George Burns Road. Runoff from George Burns Road connects to a 42-inch drain in Gracie Allen Drive.

Using *Thresholds Guide* screening criteria, it was determined that as the Project Site is currently developed and impervious to runoff, development of the Project would not be expected to change the amount of runoff from the Project Site, and run-off from the Project Site would not drain onto an unimproved street or onto adjacent properties.

Therefore, the Project is not anticipated to result in significant impacts associated with existing drainage patterns and would not require further evaluation.

Flood Zone/Flood Hazard – Using *Thresholds Guide* screening criteria, it was determined that the Project Site is not located within a 100-year flood plain, according to the FEMA Flood Insurance Rate Map, and is also not located in a hillside area, near a dam or levee, or near any large bodies of water.

Therefore, the Project is not anticipated to result in significant impacts associated with inundation and would not require further evaluation.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts with respect to hydrology or water quality not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

Land Use and Planning

The Project will not:

- Physically divide an established community.
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- Conflict with any applicable habitat conservation plan or natural community conservation plan.

The Original EIR determined that the Master Plan would have less than significant project-level impacts on land use planning and zoning. The Project would create no new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to land use planning and zoning.

The Project Site is located on the CSMC Campus and surrounded by medical, commercial and residential uses.

Using *Thresholds Guide* screening criteria it was determined that: the Project would include a land use compatible with adjacent land uses; the Project would not include features that would cause any permanent disruption in the established community; and the Project would not result in a “spot” zone.

The Project would be a 100 new inpatient bed expansion of the existing Master Plan and would assist in supporting the health care needs of the area and the region. The West Tower and attached 7-level parking structure would be similar in scale and character to other buildings on the CSMC Campus and in the surrounding area. The West Tower would not exceed 185 feet, the maximum height permitted in the Master Plan, and would be of the same architectural style as the other buildings on the CSMC Campus.

The General Plan Land Use map designates the Project Site and CSMC Campus as a Regional Commercial land use with a “Health Center” symbol. The zoning for the CSMC Campus and Project Site is [T][Q]C2-2D-O.

Using *Thresholds Guide* screening criteria, it was determined that the Project would be consistent with the General Plan and would not require a General Plan amendment.

The proposed Project will not change the type of land use on the Project Site, therefore no General Plan amendment would be required. Moreover, the established zoning of [T][Q]C2-2D-O supports the use, density, and height of the Project. Only the conditions imposed on the current zoning would be revised to accommodate amendments to the CSMC Master Plan and associated Development Agreement (Ordinance No. 168,847). The Zoning nomenclature of [T][Q]C2-2D-O and the land use designation of Regional Commercial would be retained. The Project Site is not located in or near any natural community conservation area and is not associated with any habitat conservation plan. Therefore, the Project is not anticipated to result in significant impacts due to inconsistencies with adopted plans and would not require further evaluation.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts on land use planning and zoning not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

Mineral Resources

The Project will not:

- Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

The Original EIR determined that the Master Plan would have less than significant impacts on mineral resources. The Project would create no new or substantially increased significant impacts on mineral resources beyond those analyzed in the Original EIR.

The Project Site overlies a portion of the Salt Lake Oil Field. Oil is currently being extracted from a portion of the oil field immediately adjacent to the east of the Project Site, across San Vicente Boulevard. Abandoned oil wells are located throughout the Salt Lake Oil Field, including five known abandoned wells within the boundaries of the CSMC Campus. No known oil wells are located on the Project Site.

Using *Thresholds Guide* screening criteria it was determined that the Project would not block access to any potential mineral resources.

Oil wells, which previously existed near the Project Site, have since been abandoned. The Project Site would be developed with similar uses to those currently found on site. Therefore, it is unlikely that the Project would block any ongoing oil extraction activities. The Project is not anticipated to result in significant impacts on mineral resources, and would not require further evaluation.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts on mineral resources not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

Noise (Airport)

The Project will not:

- Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, where the Project would expose people residing or working in the Project area to excessive noise levels.
- Be within the vicinity of a private airstrip, where the Project would expose people residing or working in the Project area to excessive noise levels.

The Original EIR determined that the Master Plan would have less than significant impacts with respect to airport noise. The Project would create no new or substantially increased significant impacts beyond those analyzed in the Original EIR with respect to airport noise.

Using *Thresholds Guide* screening criteria, it was determined that the Master Plan area is not located within an airport land use plan, or within two miles of a public airport or public use airport, or within the vicinity of a private airstrip.

Therefore, the Project is not anticipated to result in significant impacts associated with airport noises, and further evaluation of such is not required.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts with respect to airport noises not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

The potential significance of impacts related to other noise issues is addressed in *Section IV.B: Noise*.

Population, Housing and Employment

The Project will not:

- Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

The Original EIR determined that the Master Plan would have less than significant impacts on population and housing. Further, employment impacts in the context of jobs/housing balance were determined to be less than significant. The Project would create no new or substantially increased significant impacts on population and housing beyond those analyzed in the Original EIR.

The Project Site is currently developed with medical facilities and parking lot uses, and is located in a fully developed urban area. Using *Thresholds Guide* screening criteria it was determined that: the Project would not include a General Plan amendment, which could result in an increase in population over that projected in the General Plan; the Project would not induce substantial growth around the Project Site as it does not involve the construction of major infrastructure; the

proposed medical facilities would replace and are an extension of existing medical facilities; and the Project would not involve displacement of existing housing and/or residents.

Because the Project would not result in a substantial change to conditions previously considered, the potential impacts associated with population and housing would remain less than significant and further analysis is not required.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts on population, housing and employment not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

Public Services

The Project will not:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for:
 - Fire protection,
 - Police protection during Project construction,
 - Schools,
 - Parks,
 - Other public facilities.

The Original EIR determined that the Master Plan would have less than significant impacts on public services, including fire protection, police protection, schools, parks and recreation and libraries, except that the Master Plan would have significant project-level and cumulative impacts on fire protection services and on police protection services. Mitigation measures adopted per the Original EIR would reduce these impacts, but not to less than significant levels. Nonetheless, the Original EIR concluded that continued compliance with applicable state and local codes, and guidelines in City planning/policy documents, would reduce these impacts to the extent reasonably feasible. These significant unavoidable adverse impacts were accepted through the adoption of a Statement of Overriding Considerations. The Project would create no new or substantially increased significant impacts on public services beyond those analyzed in the Original EIR.

Fire Protection Services - The Los Angeles Fire Department (the “LAFD”) has fire stations at the following locations for initial response into the Project area. Distances shown were calculated to the intersection of Gracie Allen Drive and George Burns Road:

Fire Station No. 58 Task Force Station – Truck and Engine Company Battalion 18 Headquarters 1556 South Robertson Boulevard	1.7 miles
Fire Station No. 61 Task Force Station – Truck and Engine Company 5821 West Third Street	2.0 miles
Fire Station No. 41 Single Engine Company 1439 North Gardner Street	3.2 miles

Using *Thresholds Guide* screening criteria, it was determined that the Project would be located farther from an engine or truck company than the maximum response distance.

The maximum response distance for a Truck and Engine company to a Commercial Center is 1 mile and 0.75 miles, respectively. As shown above, the Project Site is at a slightly greater distance. However, per mitigation measures required and implemented from the Original EIR, which address CSMC Campus access and building requirements, fire protection impacts were reduced to less than significant levels. These mitigation measures would still be required as part of any additional development completed in accordance with the Master Plan, including the Project. Therefore, the Project's potential impacts related to fire protection would be adequately mitigated to less than significant levels and further analysis is not required.

As indicated in *Thresholds Guide*, the Project could result in a significant impact if the following is true:

- The Project Site is located in a brush fire hazard area, hillside, or area with inadequate fire hydrant service or street access.

However, the Project Site is located in a relatively flat, urbanized area. There are thirteen fire hydrants located on or adjacent to the CSMC Campus. The hydrant locations include four hydrants on San Vicente Boulevard, two hydrants on Sherbourne Drive, three hydrants on Gracie Allen Drive, and four hydrants on George Burns Road.

As also indicated in the *Thresholds Guide*, the Project could result in a significant impact if the following is true:

- The Project does involve the use and storage of toxic, readily combustible, or otherwise hazardous materials.

CSMC currently uses and stores liquids and gases that are flammable or combustible. The 1989 CSMC Business Plan requires biennial reporting of hazardous materials inventory changes to the

Los Angeles Fire Department and updates prior to the issuance of a Certificate of Occupancy for expansions of existing facilities.

In order to minimize health risks to employees and to the residents of the surrounding area, the CSMC places quarterly announcements in a local newspaper identifying that hazardous materials are used and stored on site, trains staff in the use and proper handling of hazardous materials, posts notices on site identifying the site contains hazardous materials, and disposes of hazardous materials properly. The Fire Department has determined that the CSMC is not required to file a Risk Management Prevention Plan, due to the quantities and concentrations of substances used on site. Conformance with all applicable laws and regulations and the implementation of all applicable CSMC safety policies and procedures is considered part of the Project.

The CSMC also has a Disaster Response Plan on file with the City of Los Angeles. The Disaster Response Plan responds to a variety of emergency conditions, such as fire and seismic events as well as the release of chemical or hazardous materials. In the event of an emergency, the CSMC is required to notify the Fire Department. The Fire Department provides assistance in control of fire or hazardous material spills and determines whether evacuation of off-site areas is necessary or appropriate. Any decision to evacuate off-site areas is at the discretion of the Fire Department. Any such decision would conform to established evacuation procedures. The CSMC would be required to update its Business Plan prior to obtaining a Certificate of Occupancy for the Project.

The *Thresholds Guide* determines that a Project would have a less than significant impact if:

- The Project's location would provide for adequate LAFD access.

Both George Burns Road and Gracie Allen Drive are wider than the minimum 20 feet required for LAFD access, do not have a grade exceeding 15 percent, and are not dead-ends exceeding 700 feet. Per the mitigation measures in the Original EIR, these site planning considerations adequately mitigate potential impacts related to emergency access to a less than significant level, and no further analysis is required.

According to the *Thresholds Guide*, a significant impact could also result if:

- There are two street intersections near the Project Site that would have a level of service (LOS) of E or F due to implementation of the Project.

The intersections of Robertson Boulevard/Alden-Gracie Allen Drive and George Burns Road/Beverly Boulevard would be significantly affected by implementation of the Project unless mitigation measures are implemented. Further analysis of these intersections, to identify appropriate mitigation measures, as well as other area intersections, as appropriate, is recommended in the Project EIR. Traffic congestion issues, including those that may affect accessibility of emergency vehicles, would be addressed through the traffic analysis in the Project EIR.

Per the Original EIR, mitigation measures pertaining to Fire Protection services were adopted and would be carried forward to the Project as follows:

- The proposed project shall comply with all applicable State and local codes and ordinances and the guidelines found in the Fire Protection and Fire Prevention Plan and the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles.
- Definitive plans and specifications shall be submitted to the Fire Department and requirements for necessary permits satisfied prior to commencement of any portion of this project.
- All first story portions of any building must be within 300 feet of an approved fire hydrant.
- Fire lanes in commercial or industrial areas shall be no more than 300 feet from a fire hydrant.
- Adequate public and private fire hydrants shall be required.
- Any person owning or having control of any facility, structure, group of structures, or premises shall provide and maintain Fire Department access.
- If any portion of the first story exterior walls of any building or structure is more than 150 feet from the edge of the roadway of an improved street, an approved fire lane shall be provided so that such portion is within 150 feet of the edge of the fire lane.
- At least two different ingress/egress roads for each area able to accommodate major fire apparatus and provide for an evacuation during emergency situations shall be required.
- Construction of public or private roadways in the proposed development shall not exceed a 15 percent grade.
- Private development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549.
- Access for Fire Department apparatus and personnel to and into all structures shall be required.
- No fire lane shall be less than 20 feet in width. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
- Sprinkler systems shall be required throughout any structure in accordance with the Los Angeles Municipal Code, Section 57.09.07.
- To mitigate potential significant impact on access, the Medical Center should covenant and agree that all current public and private streets shall remain open to free travel of emergency vehicles.
- The water delivery system shall be improved to the satisfaction of the Fire Department prior to occupancy of any new development.

Implementation of standard conditions of approval and these mitigation measures, as well as the collection of service fees/taxes associated with the Project, would reduce all fire protection service impacts to a less than significant level and would not require further evaluation.

Police Services – The Project Site is located in the Los Angeles Police Department's (the "LAPD") Wilshire Area, in Reporting District 7. The Wilshire Area station is located at 4861 West Venice Boulevard. The Project Site is currently developed with 90,000 square feet of medical uses.

The *Thresholds Guide* screening criteria for police protection services asks: Would the Project result in a net increase of 75 residential units, 100,000 square feet of commercial floor area, or 200,000 square feet of industrial floor area?

The Project would involve the development of 100 new inpatient beds (200,000 square feet of floor area for medical uses) beyond the 700,000 square feet of development approved and vested under the Master Plan. Several mitigation measures pertaining to Police Protection services were adopted per the Original EIR and Development Agreement, and would be carried forward under the Project. These mitigation measures are:

- Elevators, lobbies, and parking areas should be well illuminated and designed with minimum dead space to eliminate areas of concealment.
- Tenant parking areas should be controlled by an electronic card-key gate in conjunction with a closed circuit television system.
- Private security guards are recommended to monitor and patrol the development.
- Upon project completion, the applicant should be encouraged to provide the Wilshire Area commanding officer with a diagram of the project. The diagram should include access routes, unit numbers, and any information that might facilitate police response.
- CSMC shall make available up to 1,500 square feet of floor area within the Property for a temporary Los Angeles Police Department sub-station, subject to the acceptance and approval thereof by the Los Angeles Police Department and The Los Angeles City Council.

In addition, the CSMC uses would continue to use a private security network including closed circuit television system and security personnel throughout the CSMC Campus.

Implementation of standard conditions of approval and these mitigation measures, as well as the collection of service fees/taxes associated with the Project, would reduce the Project's police protection service impacts to a less than significant level, and no further evaluation is required.

The proposed Project would have a less than significant effect on police services during the construction phase, and further analysis is not warranted.

Schools - The Project Site is located in the Los Angeles Unified School District, Board of Education District 1. The Project Site is currently developed with 90,000 square feet of medical uses.

The *Thresholds Guide* screening criteria for schools asks: would the Project result in a net increase of 75 residential units, 100,000 square feet of commercial floor area, or 200,000 square feet of industrial floor area?

The Project would involve the development of 100 new inpatient beds (200,000 square feet of floor area for medical uses) beyond the 700,000 square feet of development approved and vested under the Master Plan. However, these medical uses would be similar to existing land uses at the

Project Site and would be an extension of the established CSMC Campus. As the surrounding area is fully developed, the addition of 100 new inpatient beds is not expected to promote residential development in areas surrounding the Project Site. Therefore, the Project is not expected to involve growth-inducing impacts associated with schools and would not require further evaluation.

Parks and Other Public Facilities – The Project involves the development of medical and parking uses.

Using *Thresholds Guide* screening criteria it was determined that the Project would not result in a net increase of any residential units.

Therefore, the Project is not anticipated to result in significant impacts to parks and other public facilities would not require further evaluation.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts on public services not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

Parks and Recreation

The Project will not:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

The Original EIR determined that the Master Plan would have less than significant impacts on parks and recreation resources. The Project would create no new or substantially increased significant impacts on park and recreation resources beyond those analyzed in the Original EIR.

The Project would not create additional demand for recreational facilities or does not include or require the construction of recreational facilities. Therefore, the Project is not anticipated to result in significant impacts to recreational facilities and would not require further evaluation.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts on park and recreation resources not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and

no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

Traffic, Transportation and Access (Air Traffic)

The Project will not:

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Air Traffic – The Project Site is not located within an airport land use plan or within two miles of a public use airport, or in the vicinity of a private airstrip. The Project would have no impact on air traffic patterns. Therefore, the Project is not anticipated to result in significant impacts to air traffic patterns and would not require further evaluation of this issue.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no impacts on air traffic patterns, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

The potential significance of the Project's impacts related to other traffic, transportation and access issues, is addressed in *Section IV: Environmental Impact Analysis: D- Traffic, Circulation and Access*.

Utilities

The Project will not:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.
- Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- Have insufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlements needed.
- Result in a determination by the wastewater treatment provider which serves or may serve the proposed Project that it does not have adequate capacity to serve the Proposed Project's projected demand in addition to the provider's existing commitments.
- Be served by a landfill without sufficient permitted capacity to accommodate the project's solid waste disposal needs

The Original EIR determined that the Master Plan would have less than significant impacts on utilities, including power, natural gas, communication systems, and storm water drainage; however, the Original EIR concluded that the Master Plan would have significant and unavoidable project-level and cumulative impacts on water conservation, sanitary sewers and non-hazardous and hazardous solid waste and disposal. The Project would create no new or substantially increased significant impacts on utilities beyond those analyzed in the Original EIR.

Water/Wastewater (Sanitary Sewers) - Water is currently supplied to the Project Site by the Los Angeles Department of Water and Power (the "LADWP"), which also distributes water to most of the City of Los Angeles. The LADWP had indicated that the existing water system could accommodate the anticipated water use demand of the CSMC Master Plan.

Using *Thresholds Guide* screening criteria it was determined that the Project would not cause the Community Plan area to exceed the projected growth in employment for the year of project occupancy/build out.

Following development of the Project, water service would continue to be provided by the LADWP. The Project would result in a net increase of 55,000 gallons³ per day over the Master Plan projected levels. The established zoning of [T][Q]C2-2D-O supports the use and density of the Project. Several mitigation measures pertaining to water usage (and sewage generation) were included in the Original EIR and as part of the existing Development Agreement. These mitigation measures are:

Water

- To the maximum extent feasible, reclaimed water shall be used during the grading and construction of the project for dust control, soil compaction, and concrete mixing.
- The project should incorporate water saving design techniques in order to minimize water requirements. The installation of water conserving plumbing fixtures and City approval of a landscape design plan would be required if the City's water conservation program is still in effect at the time of building permit issuance. If the [program is] no longer in effect, the applicant should still consider the incorporation of these measures into the proposed project, where feasible.
- Water in fountains, ponds, and other landscape features within the proposed project must be treated and filtered to meet City and State health standards. Also, recirculating systems should be used to prevent waste.
- A recirculating hot water system should be used, where feasible.
- Automatic irrigation systems should be set to ensure irrigation during early morning or evening hours to minimize water loss through evaporation.
- Drip irrigation systems should be used for any proposed irrigation system.
- Reclaimed water should be investigated as a source of irrigation for large landscaped areas.

³ Daily water consumption based on 275 gallons per 1,000 square feet. Worst case analysis assumes water consumption to be 110 percent of sewage flow. Source: Bureau of Sanitation. Sewer Facilities Charge, Sewage Generation Factors for Residential and Commercial Categories. Effective June 6, 1996.

- Selection of drought-tolerant, low-water-consuming plant varieties should be used to reduce irrigation water consumption.
- Low-flow and water conserving toilets, faucets, and showerheads must be installed in new construction and when remodeling.
- Plumbing fixtures should be selected which reduce potential water loss from leakage due to excessive wear of washers.
- Promptly detect and repair leaks.

Sanitary Sewer (Wastewater)

- The applicant must comply with the provisions of ordinances regarding sewer capacity allotment in the City of Los Angeles. In addition, the applicant must comply with Ordinance No. 166,080 which restricts water consumption and which will concurrently reduce sewage flows.
- Measures cited in Section IV.Q.4, Water, [of the Original EIR], which restricts water consumption should be implemented to reduce sewage flows.

Since the time of certification of the Original EIR and adoption of the mitigation measures through the Development Agreement, available water supply and achievement of water conservation continue to be of environmental concern. Legislation enacted since the approval of the Master Plan requires water agencies to prepare and adopt water management plans. The City of Los Angeles Department of Water and Power's ("LADWP") Urban Water Management Plan ("UWMP"), last adopted in 2005, recognizes and accounts for periods of dry conditions and calls for increased water conservation continually through year 2030 to off-set periods of diminished water capacity. LADWP is in the process of adopting updated Water Conservation Devices and Measure for New Development in the City of Los Angeles. These requirements were incorporated into the City's proposed Green Building Ordinance adopted in April 2008, and would therefore become a standard condition requirement for all new development, including the Project. In the interim, the LADWP requests that the proposed water measures be required and incorporated for all discretionary projects under review by Los Angeles Department of City Planning.⁴ Many of these water conservation devices and measures are already addressed through the adopted mitigation measures per the Original EIR. Compliance with this City requirement would further reduce the impacts of the Project.

Wastewater from the Project Site is currently treated at the Hyperion Treatment Plant (the "HTP"). The HTP treats wastewater from almost all of the City of Los Angeles, as well as from the Cities of Beverly Hills, Glendale, Culver City, El Segundo, Burbank, San Fernando, Santa Monica, and portions of Los Angeles County and 29 contract agencies.

Using *Thresholds Guide* screening criteria for it was determined that: the Project would not produce wastewater flows in a Sewer Capacity Threshold Area; the Project would produce an increase of more than 4,000 gallons per day; and the Project would not include a change in the land use limitations, which would allow greater average daily flows.

⁴ Letter to Gail Goldberg, Director of Planning, City Planning Department from H. David Nahai, Chief Executive Officer and General Manager, Los Angeles Department of Water and Power, dated March 6, 2008.

The Project would result in a net increase of 50,000 gallons⁵ per day over the CSMC Master Plan. The established zoning of [T][Q]C2-2D-O supports the use and density of the Project. The applicant must comply with the provisions of ordinances regarding sewer capacity allotment in the City of Los Angeles. The mitigation measures pertaining to water usage would also reduce sewage flows.

Implementation of standard conditions of approval and the Original EIR's mitigation measures, as well as the collection of service fees/taxes associated with the Project, would reduce the Project's water and wastewater impacts to a less than significant level, and no further evaluation is required.

Solid Waste - Solid waste from the Project Site is collected by private collection firms contracted directly with the property owner. The private collectors operating in the project area dispose of general refuse at any of four Class III landfills in Los Angeles County.

Using *Thresholds Guide* screening criteria for it was determined that the Project would not result in solid waste generation of five tons or more per week above the Master Plan generation rate.

Construction of some of the Master Plan's approved development will involve site preparation (vegetation removal and grading activities) and construction activities, which would generate typical construction debris, including wood, paper, glass, plastic, metals, cardboard, and green wastes. Construction of the Project would result in a net increase in site-generated solid waste of approximately 1,400 pounds⁶ per day or 4.9 tons per week over the projected Master Plan levels. Several mitigation measures pertaining to solid waste were included in the Original EIR and as part of the existing Development Agreement. These mitigation measures are:

- Commercial-size trash compactors shall be installed.
- White paper, glass, and metal recycling programs shall be implemented.

In addition, the Project would comply with all federal, state, and local statutes and regulations related to solid waste. Implementation of standard conditions of approval and the Original EIR's mitigation measures, as well as the collection of service fees/taxes associated with the Project, would reduce the Project's solid waste impacts to a less than significant level, and no further evaluation is required.

As such, the revisions to the Master Plan proposed by the Project would not require major revisions to the Original EIR, because there would be no new significant environmental impacts on utilities not previously analyzed in the Original EIR, no substantial increase in the severity of any significant impact previously identified in the Original EIR, no substantial changes with respect to the circumstances under which the Project is undertaken, and no new information of substantial importance meeting the test of CEQA Guidelines section 15162(a)(3) has arisen.

⁵ Based on 250 gallons per 1,000 square feet. Source: Bureau of Sanitation. Sewer Facilities Charge, Sewage Generation Factors for Residential and Commercial Categories. Effective June 6, 1996.

⁶ Seven pounds/1000 square feet. Source: City of Los Angeles Bureau of Engineering, April, 1981.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

B. SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126(b) requires that an EIR discuss significant environmental effects that cannot be avoided if the proposed project is implemented. Based upon the analysis in *Section IV: Environmental Impact Analysis*, with implementation of mitigation measures, the Project will not result in a significant environmental effect with regard to the issues analyzed herein, except for significant unavoidable impacts related to:

- Construction (short-term) air quality impacts related to NO_x, PM₁₀ and PM_{2.5}
- Construction (short-term) noise impacts at sensitive receptors

Pursuant to CEQA Guidelines Sections 15092 and 15093, and in the event the Project is approved, the City of Los Angeles must adopt a Statement of Overriding Considerations acknowledging these outstanding significant adverse impacts and stating the reason(s) for accepting these impacts in light of the whole environmental record as weighed against the benefits of the Project.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

C. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126(c) requires that an EIR discuss irreversible environmental changes due to the proposed Project. Irreversible environmental changes will not occur as a result of Project implementation. The Project Site has been committed to urban use for many years, and as a medical center since at least 1955. The Project uses are consistent with City planned land uses for the Project Site and the existing uses within the project area. Thus, development of the Project Site is not considered a new commitment to urban development and does not represent the conversion of undeveloped land.

Construction of the Project will require the consumption of natural resources and renewable and nonrenewable materials, including building materials (e.g., wood and metal) and fossil fuels (e.g., gasoline, diesel fuel, and natural gas). Once operational, the Project uses will require consumption of natural resources and renewable and non-renewable materials such as electricity, natural gas, potable water, and fossil fuels for Project-generated vehicle trips. The commitment of resources associated with the Project is consistent with planned future development within the City of Los Angeles. Moreover, the use of resources represents a very small percentage of the resources to be utilized by development City-wide.

Additionally, the Project provides public benefits through expansion of medical services and research. There is no particular justification for avoiding or delaying the continued commitment of these resources.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

D. GROWTH-INDUCING IMPACTS

How the Proposed Project Could Foster Growth

Section 15126(d) of the CEQA Guidelines requires that an EIR “discuss the growth inducing impact of the proposed Project, including ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.”

The Project is not expected to generate growth in the area beyond the intensification of the Project Site. Development of the 460,650 square foot West Tower, which will contain 90,000 square feet from the Existing Building that will be demolished, 170,650 square feet remaining under the approved and vested Master Plan, and 200,000 square feet under the Project, will result in an increase in short-term construction and long-term employment opportunities. The City of Los Angeles and surrounding areas include a large employee base; however, new jobs at the Project Site would offer employment opportunities to workers who may already reside close to or within the Wilshire Community Plan area.

The Project Site is readily accessible from area freeways, local roadways and mass transit (buses). CSMC employees come from a variety of locations throughout Los Angeles, Orange and Ventura Counties.

It is not expected that any significant number of employees will move to the area specifically because of the Project. No significant growth inducing impact would occur. Short-term construction jobs are not anticipated to induce unanticipated new population growth, because the construction process is temporary and those jobs would end once development is completed.

It is anticipated that the Project will be adequately serviced by existing extensions of the electrical, water, sewer and natural gas utility systems existing on or near the Project Site. No additional infrastructure of this nature would be constructed that could generate additional population growth in the project area.

Construction of the Project will create short-term construction jobs, as well as permanent jobs associated with the increase in medical services and research. Surrounding land uses and businesses may experience secondary effects through stimulated economic activity and growth due to an increased need for commercial support services in the general vicinity of the Project Site due to the incremental increase in the number of employees and patrons at the CSMC Campus. Although the Project would directly provide employment growth at the Project Site, and indirectly stimulate economic growth in the surrounding area, such growth is not outside the scope of what has been anticipated and planned for in the Community Plan area. Thus, no significant growth inducing impacts are anticipated.

Cumulative Development Impacts

The related projects (see *Section III: General Description of the Environmental Setting*) are primarily infill projects that will similarly add to the physical and economic revitalization of the Wilshire and West Los Angeles area. Cumulative impacts relating to each environmental issue discussed in this SEIR are addressed under the individual impact analysis sections (see *Section IV: Environmental Impact Analysis*). The City will require the preparation of an EIR for those related projects that the City anticipates will have potentially significant environmental impacts. Those EIRs must similarly discuss cumulative impacts and growth inducing effects. Individual project mitigation measures may be required in order to reduce environmental impacts. The Project and the related projects are not expected to generate unwanted or unplanned growth inducing effects. On the contrary, the City's General Plan Framework favors infill development, and the continued development of vital, Regional and/or Community Centers such as the project area to provide for high-intensity centers, consistent with the preservation and protection of low-density, single-family residential areas from encroachment by other types of uses. Such land use arrangements are generally considered to have less of an effect on the environment by preserving unplanned or premature lands from development on the urban fringe or in more remote and rural locations.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

E. MITIGATION MONITORING PROGRAM

A Mitigation Monitoring Program (“MMP”) has been prepared in accordance with Public Resources Code Section 21081.6, which requires a Lead or Responsible Agency that approves or carries out a project where an EIR has identified significant environmental effects to adopt a “reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment.” The City of Los Angeles is the Lead Agency for the Project.

The function and format of the MMP are described here, and a copy of the Draft MMP is provided in *Appendix G: Mitigation Monitoring Program* of this SEIR. A Final MMP will be adopted at the conclusion of the SEIR process and will reflect the final set of required mitigation measures to address Project impacts.

The MMP is designed to monitor implementation of all feasible mitigation measures as identified in the SEIR for the Project. In the Draft MMP, mitigation measures are listed and numbered consistent with the relevant section numbering provided in the Draft SEIR. Each mitigation measure is listed and categorized by topic with an accompanying discussion of the following:

- The phase of the Project during which the mitigation measure should be monitored (i.e., prior to issuance of a building permit, construction, or occupancy);
- The enforcing agency (i.e., the agency with the authority to enforce the mitigation measure); and
- The monitoring agency (i.e., the agency which monitors compliance and implementation of the required mitigation measure).

The Project Applicant shall be obligated to provide certification prior to the issuance of site or building plans (or an appropriate subsequent stage) that compliance with the required mitigation measures has been achieved. All departments listed in the MMP are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all mitigation measures shall be the Project Applicant unless otherwise noted.

