
University of California, Irvine
Medical Center

Long Range Development Plan

Final Environmental Impact Report

(SCH No. 2000021111)

December 2002

University of California, Irvine Medical Center
Long Range Development Plan

Final Environmental Impact Report
Volume III

December 2002

Office of Campus and Environmental Planning
University of California, Irvine
750 University Tower
Irvine, California 92697-2325

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I. INTRODUCTION

A. CEQA REQUIREMENTS

Before approving a project that may have a significant effect on the environment, the California Environmental Quality Act (CEQA) requires the Lead Agency to prepare and certify a Final Environmental Impact Report (Final EIR) (Public Resources Code, Section 21100). The contents of a Final EIR are specified in Section 15132 of the CEQA Guidelines, which states that:

The Final EIR shall consist of:

- (a) The Draft EIR or a revision of the Draft.
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the Lead Agency.

An overview of the contents of the Final EIR for the University of California, Irvine Medical Center Long Range Development Plan, indicating compliance with Section 15132 of the CEQA Guidelines, is provided below in Section I.C (Contents and Organization of the Final EIR).

The Lead Agency (The Regents of the University of California) must also provide each public agency that commented on the Draft EIR with a copy of its responses to those comments at least ten days prior to certifying the Final EIR (Section 21092.5(a), Public Resources Code).

B. PUBLIC REVIEW PROCESS

A 45-day public review period for the Draft EIR began on October 18, 2002, and ended on December 2, 2002. During that time, the Draft EIR was reviewed by various federal, state, regional, and local agencies, as well as by interested individuals. A total of six comment letters on the Draft EIR were received during the public review period from state and local public agencies. A public hearing was held on November 20, 2002, at

which no members of the public provided verbal testimony. The letters and public hearing transcript are included below in Section III (Comments and Responses).

C. CONTENTS AND ORGANIZATION OF THE FINAL EIR

This Final EIR is composed of three volumes, as follows:

Volumes I & II Draft EIR and Technical Appendices - This volume describes the existing environmental resources on the project site and in the vicinity of the project site; analyzes potential impacts on those resources due to the proposed project; identifies mitigation measures that could avoid or reduce the magnitude of significant impacts; evaluates cumulative impacts that would be caused by the project in combination with other future projects or growth that could occur in the region; analyzes growth-inducing impacts; and provides an evaluation of various alternatives to the proposed project that could eliminate, reduce, or avoid project-related impacts. The Initial Study and technical evaluations prepared for the Draft EIR are contained in the appendices.

Volume III Response to Comments and Mitigation Monitoring Program - This volume contains an explanation of the format and content of the Final EIR; text changes intended to clarify or correct information in the Draft EIR in response to comments received on the Draft EIR or as initiated by the Lead Agency; a list of persons or entities that commented on the Draft EIR; copies of comments received during public review of the Draft EIR; Lead Agency responses to the comments received on the Draft EIR; and the Mitigation Monitoring Program (MMP) for the proposed project.

D. USE OF THE FINAL EIR

The Lead Agency's administrative record on the proposed project must show that the Lead Agency reviewed and considered the Final EIR before acting on a project. After completing the Final EIR, and before approving the project, the Lead Agency shall certify that:

- 1) The Final EIR has been completed in compliance with CEQA;

- 2) The Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the project; and
- 3) The Final EIR reflects the Lead Agency's independent judgement and analysis. (Section 15090, CEQA Guidelines)

Additionally, pursuant to Section 15093(b) of the CEQA Guidelines, when the Lead Agency approves a project that will result in significant effects which are identified in the Final EIR but are not avoided or substantially lessened, the Lead Agency must state in writing its reasons for supporting the approved action. This Statement of Overriding Considerations shall be supported by substantial evidence in the record, which includes this Final EIR. Since the proposed project would result in significant, unavoidable impacts, The Regents would be required to make a Statement of Overriding Considerations in conjunction with its approval of the project.

The above certifications and the Statement of Overriding Considerations are included in a separate Findings document that will be presented to The Regents. The Findings document also contains written findings of fact for each significant environmental impact identified in the EIR. Both the Final EIR and the Findings will be submitted to The Regents for consideration of the proposed project.

II. TEXT CHANGES TO THE DRAFT EIR

A. FORMAT OF TEXT CHANGES

The following text changes are intended to clarify or correct information in the Draft EIR in response to comments received on the draft EIR or as initiated by the Lead Agency.

B. TEXT CHANGES

This section includes revisions to the Draft EIR that were initiated either by the Lead Agency or in response to public comments. The changes appear in order of their location in the Draft EIR.

Section 1.8 Executive Summary

The following corrections are made to Table 1-1 “Summary of Impacts and Mitigation Measures”:

Impact 3.3-5 is Less than Significant prior to mitigation.

Impact 3.5-2 is Less than Significant after mitigation.

Section 2.1.1 Project Description

Exhibit 2-3 is revised to accurately reflect the location of the Orange Drive-in theatre.

Section 3 Project and Cumulative Impacts

Tables 3-2 and 3-3 are revised to include the Archstone Gateway Apartments and Pinnacle at Uptown Orange Apartments.

Section 3.5 Hazards and Hazardous Materials

The text in the FEIR has been revised to identify the specific mitigation measures that will reduce impact 3.5-6 to a level of Less than Significant. This includes Mitigation Measures 3.5-2(a-d), 3.5-4(a-d) and 3.5-5 (a-e).

Section 3.7 Land Use and Planning

The date of adoption of the City of Orange Housing Element is changed to November 13, 2001.

Section 3.9 Population and Housing

The following sentences are added to Section 3.9-3:

The City of Orange has advised the University that a report currently under preparation (Orange County Council of Governments *Inter-Regional Partnership Project*) may indicate that a substantial number of future jobs in Orange County will be supported by housing in Riverside County due to the continuing jobs-housing imbalance between these two adjacent counties.

While current housing growth is focussed in southern Orange County, it is likely that housing growth will occur more evenly throughout Orange County over the long term as undeveloped land in southern Orange County decreases and redevelopment of urban areas with housing in central and northern Orange County increases.

Section 3.10 Public Services

Section 3.10.1 is revised as follows to reflect the correct staffing at Fire Stations 5 and 6:

Fire Station 5 is staffed with three fire fighting personnel, including one paramedic for Engine 5 and two personnel, including one paramedic for Orange Rescue 5. Fire Station 6 is staffed with four fire fighting personnel for Truck 6, and three fire fighting personnel for one Engine Company (Engine 6), one of whom is a paramedic.

Section 3.12 Utilities and Service Systems

Mitigation Measures 3.12 is revised. The following element will be added to this Mitigation Measure:

3.12-1 (b) Prior to the approval of any LRDP development project beyond Phase 1, the UCI Medical Center shall prepare a project-specific water demand analysis and submit the analysis to the City of Orange Water Department for use in verifying adequate water supply for the project.

III. COMMENTS AND RESPONSES

A. OVERVIEW

The public review period for the University of California, Irvine Medical Center Long Range Development Plan Draft EIR began on October 18, 2002, and ended on December 2, 2002. A Notice of Completion was filed with the State Clearinghouse on October 18, 2002 (see Appendix A for Acknowledgement of Receipt). A notice of availability of the Draft EIR also was published in the October 18, 2002 edition of *Orange County Register* (Appendix B for Affidavit of Publication).

Approximately 42 copies of the Draft EIR were sent to the County Clerk, Responsible and Trustee Agencies, representatives from the cities of Orange and the County of Orange, and all persons and organizations who had requested a copy of the Draft EIR. A complete list of recipients of the Draft EIR may be found in Appendix C. Reviewing state agencies received copies of the Draft EIR from the State Clearinghouse. Copies of the Draft EIR were also available for review at the UCIMC Planning Office and the UCI Office of Campus and Environmental Planning.

A public hearing for the Draft EIR was held at the UCI Medical Center on November 20, 2002, during which no members of the public provided verbal testimony (see Appendix D for transcript).

A total of six comment letters on the Draft EIR were received by the University during the public review period State and local public agencies.

The following information is summarized in Table III-1: (1) a list of entities and persons who submitted comments on the Draft EIR; (2) the reference code that is used in this document to identify individual remarks made by the commenters; and (3) the page numbers in this document where a copy of each comment letter followed by UCI's response may be found.

**Table III-1
LIST OF COMMENTERS ON THE DRAFT EIR**

Commenter	Reference Code	Page Numbers
State Agencies		
Department of Toxic Substances Control	A	III-4 to III-5
Department of Transportation	F	III-37 to III-41
County of Orange		
Orange County Fire Authority	B	III-6 to III-7
Orange County Transportation Authority	E	III-35 to III-36
City of Anaheim		
Planning Department	C	III-8 to III-10
City of Orange		
Department of Community Development	D	III-11 to III-34

B. COMMENTS AND RESPONSES TO COMMENTS

In this section, comments received on the University of California, Irvine Medical Center Long Range Development Plan Draft EIR are reproduced in their entirety, followed by the University of California's response to each comment. For each comment letter, comments are numbered in marginal notes and are responded to individually. In responding to comments, CEQA does not require a Lead Agency to conduct every test or perform all research, study, or experimentation recommended or demanded by commenters. Rather, a Lead Agency need only respond to significant environmental issues and does not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR (Sections 15088 and 15204, CEQA Guidelines).



Department of Toxic Substances Control

Edwin F. Lowry, Director
1001 "I" Street, 25th Floor
P.O. Box 806

Sacramento, California 95812-0806



UCI Campus & Environmental Planning

Gray Davis
Governor

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

October 24, 2002

Richard Demerjian
University of California, Irvine
750 University Tower
Irvine, California 92697-2325

Re: University of California, Irvine Medical Center Long Range Development
Plan

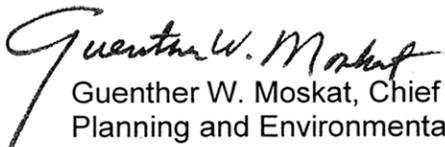
A-1

The Department of Toxic Substances Control (DTSC) is in receipt of the environmental document identified above. Based on a preliminary review of this document, we have determined that additional review by our regional office will be required to fully assess any potential hazardous waste related impacts from the proposed project. The regional office and contact person listed below will be responsible for the review of this document in DTSC's role as a Responsible Agency under the California Environmental Quality Act (CEQA) and for providing any necessary comments to your office:

Johnson Abraham
Site Mitigation Branch
5796 Corporate Avenue
Cypress, California 90630

If you have any questions concerning DTSC's involvement in the review of this environmental document, please contact the regional office contact person identified above.

Sincerely,


Guenther W. Moskat, Chief
Planning and Environmental Analysis Section

cc: Johnson Abraham
Site Mitigation Branch
5796 Corporate Avenue
Cypress, California 90630

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.
For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.*

Response to Comment Letter A – California Department of Toxic Substances Control

A-1 The comment is hereby noted.



ORANGE COUNTY FIRE AUTHORITY

P.O. Box 86, Orange, CA 92856-0086 • 145 South Water St., Orange, CA 92866

Chip Prather, Fire Chief

(714) 744-0400

RECEIVED

NOV 12 2002

UCI Campus & Environmental Planning

November 5, 2002

Office of Campus and Environmental Planning
University of California, Irvine
750 University Tower
Irvine, CA. 92697-2325
Attn: Richard Demerjian, Director

SUBJECT: UCIMC Long Range Plan SCH #2000021111

Dear Mr. Demerjian,

B-1

Thank you for the opportunity to review the draft EIR document. Given the nature of the project, the impacts to the OCFA are not significant as long as the LRDP is specific to the "The City Drive" location. Orange City Fire Department has responsibility for approval on the mitigation of the LRDP/Program, and for additional approval processes.

Thank you for providing us with this information. Please contact me at 714-744-0484 if you have any questions.

Sincerely,

Gene F. Begnell
Battalion Chief, Strategic Services

Response to Comment Letter B – Orange County Fire Authority

B-1 The comment is hereby noted. The Project is specific to the UCI Medical Center location.



RECEIVED

NOV 27 2002

UCI Campus & Environmental Planning

November 25, 2002

Richard Demerjian, Director
UCI Office of Campus and Environmental Planning
750 University Tower
Irvine, CA 92697-2325

RE: NOTICE OF AVAILABILITY OF A DRAFT EIR FOR THE UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER (UCIMC) LONG RANGE DEVELOPMENT PLAN

Dear Mr. Demerjian:

Thank you for the opportunity to review and comment on the above-referenced document. City of Anaheim staff offer the following comments:

Traffic Impacts - The Public Works Department, Traffic Engineering Division, requests that prior to certifying Draft EIR, the following issues be addressed:

C-1

- **Page 3.11-6; Table 3.11-3:** The intersection of Lewis Street and Orangewood Avenue is unsignalized and should be analyzed accordingly. Based on existing counts, signal warrant analysis needs to be conducted. If the intersection does not meet the signal warrant under the existing condition, warrant analysis should be performed for subsequent development scenarios (i.e., short-range (year 2010) with and without project as well as long-range (year 2020) with and without project).

C-2

- **Page 3.11-9:** The City of Anaheim Traffic Impact Study guideline defines “significant impact” at signalized intersections in accordance with the following table:

Level of Service	Final V/C Ratio (Project Related)	Increase in V/C
C	>0.700-0.800	equal to or greater than 0.050
D	>0.800-0.900	equal to or greater than 0.030
E & F	>0.900	equal to or greater than 0.010

For purposes of this calculation, the “Final V/C Ratio” shall mean the future V/C ratio at an intersection considering impacts with Project, Ambient Growth and related Projects, but without any proposed mitigation. The traffic study should determine project impacts accordingly.



C-3

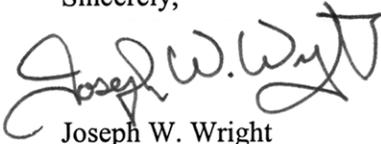
- **Page 3.11-21:** Use of the Edison Field parking lot as a short-term off-site faculty and staff parking area will not be permitted and cannot be assumed.

Should you have any questions regarding these traffic-related comments, please contact Alfred Yalda, Principal Transportation Planner, at (714) 765-5183, Extension 4542.

C-4

We would again like to thank you for the opportunity to comment on the above-referenced project. Please forward any subsequent public notices and/or environmental documents regarding this project to my attention at the address listed at the bottom of the first page of this letter. If you have any questions regarding this response, please do not hesitate to contact me at (714) 765-5139, Extension 5750.

Sincerely,



Joseph W. Wright
Associate Planner

cc: John Lower, Public Works - Traffic Engineering
Alfred Yalda, Public Works - Traffic Engineering

Response to Comment Letter C – City of Anaheim

C-1 It is recognized that this intersection is currently unsignalized. The project traffic analysis utilized the signalized intersection methodology for calculating the Intersection Capacity Utilization (ICU) for this intersection for consistency purposes. Since this intersection is not impacted by the project (project peak hour trips are less than one percent of total trips) a detailed analysis of this location was not conducted.

C-2 The proposed project is located within the City of Orange; therefore, City of Orange thresholds of significance (increase greater than 0.01 at locations which reach LOS “E” or “F”) were applied to study intersections. Use of the Anaheim criteria for intersection impact significance requires a three-decimal calculation for ICUs. Reference to the LRDP Traffic Analysis 2020 data for the three Anaheim intersections where the two decimal calculation used in the analysis shows a 0.01 percent impact, gives the following three decimal project impacts:

LOCATION	PROJECT ICU CONTRIBUTION
1. State College & Katella (AM)	.004
4. State College & Gene Autry (AM)	.008
5. State College & Orangewood (AM)	.002

Therefore the project impact does not exceed .010 for any location.

C-3 Edison Field was identified as one of several options for off-site parking. Previous consultation between the University and Edison Field staff identified this site as a viable option. If this option is not available to the University, adequate parking capacity exists within the other options listed on Table 3.11-11 in the DEIR in combination with existing off-site parking facilities. Existing off-site parking facilities include the recently completed lease of 240 spaces at the Equity Partners “City Towers” and 375 spaces at the County of Orange Theo Lacy Facility.

C-4 The comment is hereby noted.



CITY OF ORANGE

DEPARTMENT OF COMMUNITY DEVELOPMENT

FAX (714) 744-7222

ADMINISTRATION
(714) 744-7240

PLANNING DIVISION
(714) 744-7220

BUILDING DIVISION
(714) 744-7200

November 27, 2002

#31-02

Mr. Richard Demerjian
University of California at Irvine
Office of Campus and Environmental Planning
750 University Tower
Irvine CA 92697-2325

Subject: Draft Environmental Impact Report for the University of California, Irvine Medical Center Long Range Development Plan

Dear Mr. Demerjian,

D-1

The City of Orange (City) has received and reviewed the Draft Environmental Impact Report (DEIR) for the University of California, Irvine (UCI) Medical Center Long Range Development Plan. The proposed project consists of the preparation of a Long Range Development Plan (LRDP) for the UCI Medical Center, located at 100 City Drive in the City of Orange. The LRDP would allow an expansion of the existing Medical Center facility to accommodate a total build-out (Year 2020) of 1,902,049 gross square feet that would house 527 hospital beds and provide 4,200 parking spaces. This represents an increase of 991,684 square feet, 136 hospital beds and 2,610 parking spaces compared to existing conditions. The DEIR also evaluates the implementation of Phase I of the LRDP, which includes the demolition of several onsite structures, construction of new structures (including a 254-bed hospital, modular building and surface parking), and the retention of some existing structures. After the implementation of Phase I of the LRDP, the Medical Center will consist of 1,199,741 gross square feet which will house 445 beds and 1,432 parking spaces.

The City would appreciate consideration of the following comments.

D-2

Executive Summary

1. Impact 3.3-3 states that the project is not expected to affect archaeological resources, but indicates a "Significant Impact" in the second column of the table. Please revise the text to clarify whether or not the impact is considered significant.

Richard Demerjian
November 27, 2002
Page 2

D-3 [2. Impact 3.3-5 states that there would be a "Significant Impact" to historic resources, but then indicates the level of significance after mitigation to be "Less than Significant" even though no mitigation is provided. Please revise the text to either add mitigation or clarify how the impact is reduced to a less than significant level.

D-4 [3. Impact 3.5-2 is listed as a "Significant Impact", but no level of significance after mitigation is identified. Please revise the text to indicate the level of significance after mitigation.

D-5 [4. Impact 3.5-6 is identified as "Significant", but is then reduced to a "Less than Significant" level after mitigation; however, no mitigation is identified. Please revise the text to indicate how the significant impact will be reduced to a less than significant level.

Project Description

D-6 [5. Exhibit 2-3, Surrounding Land Uses, incorrectly labels the former Orange Drive-In site as "Stadium". Please re-label the site to accurately represent the current use.

Cumulative Impact Analysis

D-7 [6. Page 3-5 describes projects that were used in the analysis of cumulative impacts and lists two projects located within the City of Orange. In October 2002 two major residential development applications were submitted for the former Orange (Pacific Theater) Drive-In property (currently referred to as the "Archstone Gateway Apartments" development) located at 291 State College Avenue in both the Cities of Orange and Anaheim, and the former Cinedome property (currently referred to as the "Pinnacle at Uptown Apartments" development) located at 3001 West Chapman Avenue. The proposed Pinnacle Apartments development would add 462 residential units to the area and the Archstone Apartments development would add 884 residential units to the area. These projects represent major developments within close proximity to the UCI Medical Center that would substantially affect the cumulative impact analysis and should be included in the EIR.

Both the Archstone and Pinnacle applications with the City include a request for a General Plan Amendment that would allow residential development to occur on these sites. A Zone Change to Specific Plan is also being requested for each project. Therefore, Tables 3-2 and 3-3 should be updated.

D-8 [Additionally, it is anticipated that the former Ramada motel site will redevelop in the near future with a possible mixed-use (retail and residential) development. However, currently there are no applications on file with the City for this project.

Richard Demerjian
November 27, 2002
Page 3

Land Use and Planning

- D-9 [7. An update of the City of Orange Housing Element was adopted on November 13, 2001. The reference to the 1993 Housing Element on page 3.7-6 should be corrected, and other adjustments to the text made as needed to reflect the most current Housing Element.

Air Quality

- D-10 [8. Are alternative fuel facilities (i.e., hook-ups for electric or natural gas vehicles) included in project implementation, or have they been given consideration in the development of mitigation measures?

Noise

- D-11 [9. The discussion of helistop noise on pages 3.8-11 and 3.8-12 should be revised to reflect potential noise impacts on the proposed multi-family residential projects (Archstone and Pinnacle apartments) referenced in the Cumulative Impact Analysis comment above. Based on the description of the typical approach pattern of helicopters to the medical center, these projects would be located under the flight path.

Population and Housing

- D-12 [10. The discussion of impacts associated with increased housing demand on page 3.9-6 raise a number of questions about the demand for housing that would be generated by project implementation. It is the City's understanding from a study of commuting and job-housing imbalance between Orange and Riverside Counties that is currently under preparation (Orange County Council of Governments *Inter-regional Partnership Project*) that a substantial proportion of individuals working in the City of Orange commute from Riverside County.

- D-13 [11. Furthermore, the conclusion that the majority of future household growth in Orange County will occur in the southern parts of the County based on growth trends since 1980 appears questionable given the fact that in recent decades South County experienced high levels of growth due to the availability of undeveloped land. With build-out of vacant land in South County rapidly approaching, future housing growth trends will likely reflect the distribution of new housing more evenly throughout the County as a result of redevelopment at increased densities.

- D-14 [12. While these factors may not alter the conclusion of the housing impact discussion, the analysis on which the conclusion is based should be reconsidered. Furthermore, the analysis should consider the foreseeable land use changes in the Cities of Orange and Anaheim that suggest the redevelopment of nearby areas from commercial or industrial land uses to residential development.

Richard Demerjian
November 27, 2002
Page 4

Public Services

D-15

13. Section 3.10.1 (Page 3.10-1) states "Fire Station 5 is staffed with four fire fighting personnel for Truck 5...". This statement should be revised to reflect that Fire Station 5 is staffed with three fire fighting personnel, including one paramedic, for Engine 5; and, two personnel, including one paramedic, for Orange Rescue 5. Fire Station 6 is staffed with four fire fighting personnel for Truck 6, and three fire fighting personnel for one engine company (Engine 6), one of whom is a paramedic.

Traffic and Parking

D-16

14. In Figures 2-2 and 2.3 (Pages 2-8 and 2-9) which depict the project trip distribution percentages, please indicate the percentages at each project access point.

D-17

15. In order to better understand the project's impact on the local circulation system, please add an exhibit to the report that shows the project traffic for the AM and PM for both short and long range plans on the roadway network.

D-18

16. In the section on Short-Range Conditions (Page 3-4), there is no mention of the two proposed residential development projects referenced previously in Comment #6 (Archstone Gateway Apartments and Pinnacle at Uptown Apartments). A review of the Land Use and Trip Generation Summary indicates that these two sites (Zones 11 and 13) have either no land use assumed for 2010, or use existing data that is not representative of what will be on this site in the year 2010. Zones 11 and 13 need updated 2010 data to reflect the two residential projects.

D-19

17. As part of the discussion of Short-Range Impacts (Page 4-1), there is a sentence that states, "All parking is assumed to be provided on-site, with the off-site parking currently occurring transferred to on-site." While this ample supply of on-site parking may become available at the conclusion of Phase I construction, there will be a severe parking deficit during the construction period. The report indicates that the existing parking demand is 2,000 vehicles. During Phase I construction, over 400 on-site parking spaces will be lost. After subtracting out the 100 on-site spaces to be used by construction vehicles, there will be approximately 1,000 on-site spaces available. This means that 1,000 off-site parking spaces will need to be available during Phase I construction. The report must document how many of the existing 875 off-site parking spaces will be available during Phase I construction, as well as the location of the remainder of the needed spaces.

D-20

18. Table 2-3 of the Draft EIR (Page 2-6) states that the Medical Center currently uses 875 off-site parking spaces. Yet The Parking Analysis in the Traffic Study (Page 6-1) calls out 733 off-site spaces. This discrepancy needs to be corrected.

Richard Demerjian
November 27, 2002
Page 5

- D-21 [19. As part of the Parking Analysis, please provide a site plan that will show the proposed locations of the on-site parking facilities, as well as the number of spaces to be provided for the short and long-range plans.
- D-22 [20. As part of the discussion on the Off-site parking structure that will be built as part of the second phase, the location that has been identified (Southwest corner of Chapman/Manchester) currently has an office building on it. Please address this conflict as part of the Long-Range Impact Analysis.
- D-23 [21. In Table 7-1 (Page 7-2), do the estimated costs include Right-of-way costs? Also, please indicate in the Table which of the "Add" portions of the mitigation will require any Right-of-way acquisition.
- D-24 [22. Table 7-3 (Page 7-4) is missing the intersection of The City Drive and Medical Center Way.
- D-25 [23. The costs that were assumed for the fair share calculations are only estimates. While the project's fair share percentage will not change, the actual dollar amount that will be required for each mitigation measure will be calculated by city staff at the time that each improvement is initiated
- Water**
- D-26 [24. Please clarify the source of the figures provided on Page 3.12-3 related to the provision of water. It is unclear what the basis is for the text that states that the City's Water Department will provide an "anticipated generation of 329,760 gpd, an increase of 155,gpd." This data was not provided by the City.
- D-27 [25. The City of Orange Water Department requests information about the projected water demand associated with the proposed Long Range Development Plan. The analysis and conclusions contained in the water service discussion of the DEIR does not accurately reflect the City's ability to serve the Medical Center due to the fact that the City has not had an opportunity to review the anticipated increase in demand. This information has been requested by the Water Department both verbally and in writing, yet to response has been provided.

Richard Demerjian
November 27, 2002
Page 6

D-28

The City appreciates the opportunity to comment on the DEIR and looks forward to reviewing the Responses to Comments upon completion. If you have any questions, please contact me or Jennifer McDonald at (714) 744-7220.

Sincerely,



Karen Sully
Planning Manager

c: Alice Angus, Community Development Director
Harry Thomas, Public Works Director
Jennifer McDonald, Associate Planner/Environmental Review Coordinator
Anna Pehoushek, Senior Planner

N:\C D D\PL N G\Development Outside City_Outside Agencies\2002 Comment Letters for Outside Agency Env Docs\33-02 UCI Medical Center EIR.doc

Response to Comment Letter D – City of Orange

- D-1** The comment is hereby noted.
- D-2** Although the project is not expected to significantly affect archeological resources, the analysis on page 3.3-17 in the Draft LRDP EIR (DEIR) identifies Impact 3.3-3 as potentially significant since previously unknown cultural resources could be uncovered during project implementation. This potentially significant impact can be mitigated to a level of Less than Significant through implementation of Mitigation Measure 3.3-3. Summary Table 1-1 of DEIR lists all potentially significant impacts as Significant.
- D-3** Table 1-1 contains a typographical error for impact 3.3-5. As described on page 3.3-19 of the DEIR Impact 3.3-5 is Less than Significant prior to mitigation. Table 1-1 in the FEIR has been revised to reflect that impact 3.3-5 should be listed as Less than Significant prior to mitigation.
- D-4** Table 1-1 contains a typographical error for impact 3.5-2 by omitting the Level of Significance after mitigation. As described on page 3.5-16 of the DEIR, Impact 3.5-2 is potentially significant prior to mitigation, but can be reduced to a Less than Significant level through implementation of Mitigation Measure 3.5-2 (a-d). Table 1-1 correctly lists Impact 3.5-2 as Significant prior to mitigation, but omitted listing this impact as Less than Significant after Mitigation. The text in the FEIR has been revised to reflect that impact 3.5-2 should be listed as Less than Significant following mitigation in Table 1-1.
- D-5** The text in the FEIR has been revised to identify the specific mitigation measures that will reduce impact 3.5-6 to a level of Less than Significant. This includes Mitigation Measures 3.5-2(a-d), 3.5-4(a-d) and 3.5-5 (a-e).
- D-6** Exhibit 2-3 in the FEIR has been revised to reflect the correct location of the Orange Drive-in site.
- D-7** The applications for these two development projects (“Archstone Gateway Apartments” and “Pinnacle at Uptown Apartments”) had not been received and filed by the City of Orange at the time the Notice of Preparation (NOP) for the Draft EIR was circulated for public review nor were these applications available during preparation of the Draft EIR. These applications were received by the City on September 26, 2002 and October 31, 2002 respectively. The Draft EIR and Notice of Completion for the UCI Medical Center LRDP EIR was circulated for public review on October 18, 2002.

The following discussion is provided to ensure that all potential effects resulting from the UCI Medical Center LRDP project are adequately described and analyzed. The following discussion includes current descriptions of the proposed Archstone and Pinnacle projects as well as evaluation of any changes to the findings for the cumulative impact analysis in the LRDP DEIR.

The following descriptions were compiled from information contained in the project applications that were provided to the University by the City of Orange on December 2, 2002:

Pinnacle at Uptown Orange

The project applicant, B.R.E. Properties, Inc. proposes to develop a 462-unit luxury apartment complex to be named "The Pinnacle at Uptown Orange" on 11.52 acres at 3001 Chapman Avenue in the City of Orange (see Figure III-1). The proposed project would include apartments ranging from a junior one-bedroom unit at 560 square feet to a two-bedroom/two bathroom unit with a minimum of 1,050 square feet (see Figure III-2). The complex would include a clubhouse with leasing and management offices, an activity room with a fully equipped kitchen, a business center with computer workstations, fax/copier/scanner and high-speed Internet access, a fully equipped fitness center, and a media room/theater. The complex would have two pools, barbecues, and various green spaces interspersed throughout the property. The project would also connect to the Santa Ana River Bike Trail, which is adjacent to the project site on the southeast side. Units on the southern half of the complex would wrap around an interior 4.5-level parking structure. Units on the northern portion of the property would be walk-up units with parking around the site perimeter. Building height would be four stories for the units surrounding the parking structure and three stories for the walk-up units. The Caltrans parcel adjacent to the site on Chapman Avenue may be purchased by BRE Properties, Inc. and if so, would become a part of the project at the time that City action is requested on this project. This additional parcel would allow the clubhouse to be moved westward and expand the accompanying recreational area.

The proposed project would require the following actions: 1) a General Plan Amendment, 2) a Zone Change from C-1 to Planned Community (PC) District, 3) Major Site Plan Review, 4) a Specific Plan pursuant to Chapter 17.26 of the City of Orange Municipal Code and 5) a lot line adjustment to consolidate the two parcels that comprise the project site. The General Plan Amendment would be necessary in order to allow limited residential uses in a District currently designated as General Commercial. A new overlay district, District H, would also be added to the current system of commercial overlay districts, as both a text and Land Use Policy Map amendment. Overlay District H would encompass the project boundary and would allow for both commercial and high-density residential development. The overlay district would also increase the maximum allowable Floor Area Ratio (FAR) from 0.5 to 2.5 FAR. A Development Agreement may also be a component of the project.

A Notice of Preparation and Initial Study NOP/IS for a Draft Environmental Impact Report was circulated by the City (and received by the University) on December 3, 2002. The Initial Study for the proposed project indicates that there may be significant adverse environmental impacts associated with this project in the areas of aesthetics, air quality, cultural resources, hydrology, land use and planning, noise, public services, recreation, and transportation/traffic. These issues will be addressed in the Pinnacle Draft EIR.

Archstone Gateway Apartments

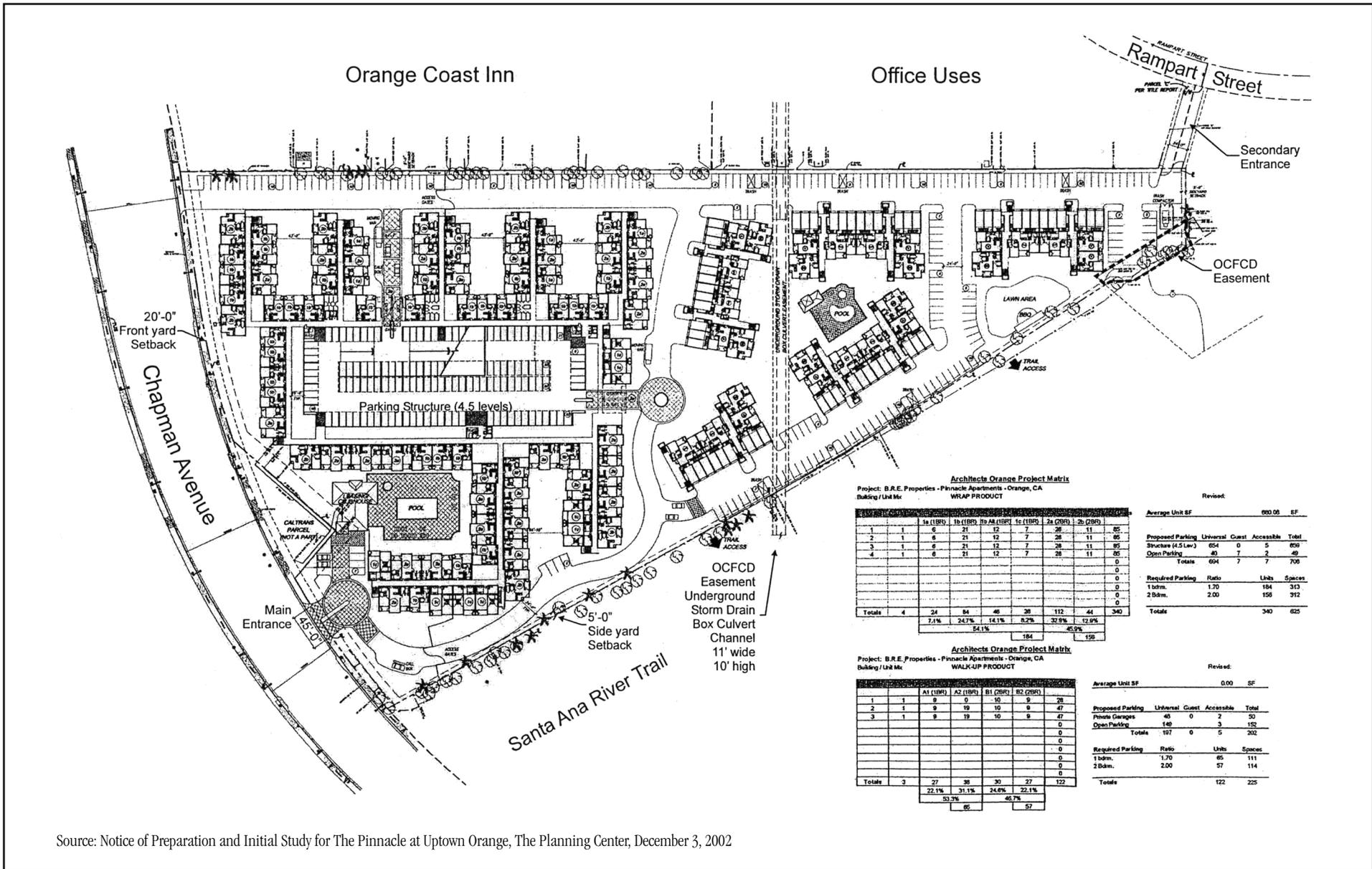
The applicant is proposing a General Plan amendment and zone change to allow the construction of an 884-unit multi-family residential development (see attached site map). The proposed project site is divided between the jurisdictional boundaries of



Source: Notice of Preparation and Initial Study for The Pinnacle at Uptown Orange, The Planning Center, December 3, 2002



Figure III-1
Location of Proposed
Pinnacle and Archstone Projects



NO SCALE

Figure III-2
The Pinnacle at Uptown Orange
Preliminary Site Plan

the Cities of Orange and Anaheim, with 536 of the total units located in the City of Orange. In addition to the residential units, the project includes recreational amenities including an approximately 6,000 square foot clubhouse, sports courts, fitness rooms, pools, and spas. There has been no NOP or other CEQA documents circulated for this project as of December 4, 2002.

Although these specific project applications were not available at the time the DEIR was prepared, the LRDP project analysis recognized that redevelopment at the former Orange (Pacific Theatre) Drive-In and Cinedome property (also referred to as the "Uptown" area) may occur based on consultation with the City of Orange during preparation of the West Orange Circulation Study (WOSC) and LRDP traffic analysis and review of General Plan land uses assumptions for these parcels. These assumptions are identified in the LRDP DEIR in LRDP Traffic Study Figure B-1, Appendix B (DEIR Volume II – Appendix F).

A comparison between the land use assumptions in the WOCS and related LRDP traffic analysis and the proposed Archstone and Pinnacle projects can be made using information contained in Appendix B of the LRDP Traffic Analysis and representative trip rates for these two proposed residential projects. The following table compares the assumptions in Table B-1 for WOCS traffic zones 11 (Archstone) and 13 (Pinnacle) with these recently proposed projects for the year 2020:

LAND USE	AMOUNT	ADT TRIP GENERATION
I. WOCS (LRDP)		
Commercial	119 TSF	5,107
Office	2,000 TSF	22,020
TOTAL	1200 TSF	27,127
II. FILED PLANS (ARCHSTONE AND PINNACLE)		
Apartments	462 DU	3,000
Apartments	884 DU	5,740
Office*	60 TSF	661
Hotel*	100 Rooms	823
TOTAL		10,224
* These uses are for the portion of zone 13 outside the Pinnacle project site (existing uses)		
DU – dwelling unit		
TSF – thousand square feet of floor area		

As indicated in this table, the proposed Archstone and Pinnacle projects would result in a lower trip generation than was assumed in the 2020 LRDP analysis for these two traffic zones. The WOCS assumptions for 2010 are for no new construction in these two zones. Construction and occupancy of these two projects prior to 2010 would result in slightly higher background volumes in 2010, the increase varying by location. This increase in background traffic would have no effect on the findings in the traffic analysis, which indicates that the project has no significant impacts in this time frame. The statement on page 4-1 of the LRDP Traffic report “*the proposed expansion under short-range conditions will generate virtually no additional peak hour trips*” is unchanged by any change in background traffic volumes. Reference to the 2010 Intersection Capacity Utilization (ICU) values in the LRDP Traffic Study shows no significant increases due to the project in this time frame, and such project related incremental differences in ICU values are unchanged by any change in background traffic. The finding that no significant project impacts occur in 2010 would remain unchanged by these two proposed residential projects in these two traffic zones.

The University has reviewed the project descriptions provided by the City of Orange on December 2, 2002 in comparison with the cumulative impact analysis in the DEIR for each relevant environmental issue area to identify any changes to the findings in the DEIR. Following is a summary of that evaluation:

Aesthetics – The Archstone and Pinnacle project sites are located across (north) of Interstate 5 from the Medical Center, which is outside of the cumulative study area for visual impacts identified in section 3.17 of the DEIR. Based on review of the project descriptions, the aesthetics of the proposed projects would be generally compatible with other residential and non-residential development within the study area. There would be no change to the conclusion in section 3.1.7 of the DEIR that LRDP project contribution to cumulative effects related to intensification of development, lighting, and glare would be less than significant.

Air Quality – The proposed Archstone and Pinnacle projects are within the cumulative impact study area for the LRDP. As described above, the vehicular trip generation and distribution would be less than assumed in the LRDP DEIR analysis, therefore air quality effects from mobile sources would be remain unchanged or be slightly reduced from the assumptions in the DEIR. The proposed Archstone and Pinnacle projects would not alter the findings regarding cumulative air quality impacts in the DEIR. The project contribution to CO, ROC, and NOx would remain significant and unavoidable.

Cultural Resources – Proposed redevelopment of the Archstone and Pinnacle projects on these two project sites, rather than redevelopment consistent with the existing General Plan, would not change the conclusions regarding impacts to Cultural Resources in Section 3.5.5. The LRDP’s contribution to cumulative impacts to cultural resources would remain less than significant.

Geology and Soils – The sites for the proposed Archstone and Pinnacle projects are within the cumulative study area of the LRDP. Section 3.4.5 of the DEIR finds that the LRDP’s contribution to soils, geology and seismic impacts would not be significant when combined with proposed development within this cumulative study area, as the LRDP

and cumulative projects will comply with adopted geotechnical and seismic building standards. Proposed development of these two project sites for residential uses would not affect LRDP contribution to cumulative impacts related to soils and geological impacts or to cumulative seismic impacts since these proposed residential projects will adhere to similar codes and standards as the LRDP and other assumed cumulative projects. There were no potential impacts related to soils and geology identified in the December 3, 2002 Pinnacle NOP/IS.

Hazards and Hazardous Materials – The site for the proposed Archstone and Pinnacle projects are within the cumulative study area for Hazards and Hazardous materials. The DEIR finds that the proposed LRDP project contribution to the increased use, storage, transport and disposal of hazardous materials is considered cumulatively significant, but that mitigation measures 3.5-2, 3.5-4 and 3.5-5 will mitigate impacts to a less than significant level. Proposed development of these two project sites for residential uses would not change the finding that these mitigation measures will effectively reduce these impacts to a less than significant level. The Pinnacle NOP/IS found that no potential impacts from hazards and hazardous materials would result from project implementation.

Hydrology and Water Quality – The sites for the proposed Archstone and Pinnacle residential projects are within the cumulative impact study area for Hydrology and Water Quality. The analysis in Section 3.6-5 of the DEIR find that the LRDP's contribution to cumulative water quality impacts will be significant, but can be mitigated to a less than significant level by project mitigation measures including structural and non-structural Best Management Practices (BMP's). Proposed development of these two residential projects would not alter the finding in the DEIR as these projects will conform to similar BMP's (page 34 Pinnacle NOP/IS).

Land Use and Planning - The proposed Archstone and Pinnacle projects are within the cumulative study area for Land Use and Planning. Section 3.7.5 of the DEIR describes the "Anaheim Gateway Project" (335,000 SF of retail, restaurant and service use), which would be replaced by the Archstone project. Proposed redevelopment of these two project sites, including a change in assumed land use at the Anaheim Gateway site, would not impact the LRDP project compatibility with local plans. The revised land uses (i.e., rental housings) would be compatible with, and support, the LRDP.

Noise – As the traffic generation and distribution would remain unchanged, the proposed Archstone and Gateway residential projects would not impact the finding that the LRDP project contribution to cumulative noise and vibration impacts would be less than significant. Please see response to comment D-11 for discussion of noise effects from helicopter flights on these two proposed residential projects.

Population and Housing - The provision of additional housing opportunities at the Archstone and Pinnacle project locations in the City of Orange would assist the City in meeting its Regional Housing Needs Assessment (RHNA) construction need of 3,204 dwelling units, including 635 very low income, 395 low income, 657 moderate income, and 1,518 above moderate income units. There would be no change to the finding that the LRDP contribution to cumulative increases demand for employment and housing would be less than significant.

Public Services – The proposed Archstone and Pinnacle projects are within the general cumulative study area for the LRDP related to Public Services. These two proposed projects, along with all development projects in the Cities of Orange and Anaheim, are required to avoid or mitigate effects to the provision of services to existing, planned, and foreseeable future development. Therefore, the Findings in section 3.10-4 that the LRDP project contribution to cumulative demand for public services will be less than significant would remain unchanged.

Transportation and Traffic – The Archstone and Pinnacle projects are within the cumulative traffic impact study area of the DEIR. As described above, the vehicular trip generation for the Archstone and Pinnacle projects would be less than assumed in the WOCS and LRDP traffic analysis for 2020 and would be higher than assumed in 2010 if these two projects were implemented prior to 2010. Review of project contribution to ICU values in the LRDP Traffic Analysis for 2010 indicate that there would no significant increases, therefore no significant impacts. The findings that the LRDP project contribution to cumulative impacts would be less than significant after mitigation would remain unchanged.

Utilities and Service Systems – The Archstone and Gateway projects are within the cumulative study area for Utilities and Service Systems. These proposed projects, along with all development projects in the Cities of Orange and Anaheim, are required to provide adequate on-site utilities services and avoid or mitigate effects on the provision of utility services to existing, planned, and foreseeable future development. The Findings in section 3.12 that the LRDP project contribution to cumulative demand for Utilities and Service Systems will be less than significant would remain unchanged.

Based on review and analysis of the project descriptions for the proposed Archstone and Gateway projects in comparison to the analysis in the LRDP DEIR for each environmental topic area described above, it has been determined that there will be no change in the findings of the cumulative impact analysis in the LRDP DEIR resulting from these two development applications.

- D-8** The comment is hereby noted. No information has been provided to the University that would allow evaluation of this potential future project proposal. Please note that the WOCS traffic model assumes additional development beyond the Archstone and Pinnacle projects within this area of the City of Orange for 2020.
- D-9** The text in the EIR has been revised to reflect the updated City of Orange Housing Element.
- D-10** There are currently no facilities at the UCI Medical Center to service alternative fuel vehicles. Fleet vehicles at UCI Medical Center are provided by the UCI Main Campus in Irvine. The UCI Main Campus has multiple facilities for servicing alternative fuel vehicles and is actively conducting pilot programs for several alternative fuel vehicle technologies.
- D-11** The commentator is correct in noting that Emergency Helicopter flightpaths serving the UCI Medical Center Helistop will travel over or near the recently proposed Archstone

and Pinnacle residential projects. The following information is provided to expand the analysis of noise impacts contained in Section 3.8 of the LRDP DEIR.

The UCI Helistop is an existing facility that will remain unchanged with implementation of the proposed project. The approved flight patterns (Department of Transportation Heliport Permit ORA-050) will not change as a result of implementation of this project. The Helistop is located near the southwest corner of the intersection of City Drive and Chapman. Helicopters fly into and out of the helistop to the north-northeast (Magnetic heading of 20 degrees). There are approximately 12 helicopter operations per month (6 arrivals and 6 departures). Use of the helistop is completely dependent on the number of emergency events that require the use of a helicopter to transport patients therefore the frequency of flights is not directly related to implementation of the proposed LRDP project. The times that helicopter events occur are also completely dependent on these emergencies. At another medical center helistop (Harbor UCLA), approximately 24% of the operations occurred during the nighttime hours (typically considered 10 p.m. to 7 a.m. for noise purposes). This would equate to approximately 4 nighttime helicopter operations (2 arrivals and 2 departures) to the UCI Medical Center each month. Based on the infrequency of these flights the DEIR found that impacts resulting from noise resulting from helistop operations would be less than significant.

The recently proposed Archstone and Pinnacle projects are located northeast of the project (see attached site map) on the other side of the I-5 Freeway east of State College Boulevard. The nearest proposed residential area is located approximately 950 feet from the helipad. Helicopter operations would likely occur over these proposed residences.

State and local agencies are pre-empted from establishing noise restrictions on aircraft by the FAA. FAA standards are the same as the Cities' of Anaheim and Orange transportation noise planning guidelines of 65 CNEL. Because of the infrequency of the events, noise generated by the helicopters at the Medical Center will be significantly below the 65 CNEL threshold at the proposed residential areas. Therefore, the proposed residences will not be significantly impacted by noise from the helicopters.

Helicopter operations to and from the medical center will generate noise levels that will be audible both outside and inside the proposed residences. Helicopter operations could interfere with outdoor speech at portions of the proposed residential developments during short periods of the operations (approximately 10 seconds or less). Louder operations could generate noise levels that interfered with speech inside some of the residences for short periods (approximately 10 seconds or less). Nighttime operations could result in sleep interruption for some residents (less than 10% exposed to the highest noise levels). Note that sleep interruption is not solely full awakenings. Sleep interruption also includes disturbances of the typical sleep cycle that a disturbed person may or may not be aware of after the fact.

Consistent with the findings in the DEIR that the helistop would not result in significant noise impacts, the Initial Study and Notice of Preparation (IS/NOP) issued by the City of Orange for the "Pinnacle at Uptown Orange" apartment project dated December 3, 2002 describes the UCI Medical Center Heliport as having no significant noise impacts on this proposed project. As described in the IS/NOP: *The heliport located at the UCI Medical Center would expose residents to occasional noise impacts; however, the heliport is*

used for emergency transport and would not represent a consistent or excessive noise impact. No mitigation measures are necessary.

Based on the analysis in the DEIR and this additional information, the findings that noise impacts from helistop operations are less than significant remain unchanged.

- D-12** The draft Interregional Partnership Project report is being prepared by the Western Riverside Council of Governments (WRCOG) and the Orange County Council of Governments (OCCOG). The primary goal of the WRCOG-OCCOG project is to “foster a more sustainable land use pattern providing appropriate employment closer to where people live and more affordable housing closer to employment in jobs-rich areas throughout the Study Area.” The draft findings of the report are summarized below:

Housing Supply and Affordability

Riverside County – Overall, the County should not encounter supply constraint problems but can expect diminishing capacity for additional housing in close proximity to Orange and San Diego Counties (gateway markets). Diminished capacity in gateway markets will impact sub-market affordability and increase demand for new housing along the I-15 Corridor, Central Riverside County, and planned communities in the greater Prado Basin area of San Bernardino County. Near exclusive emphasis on low-density detached product as the principal form of housing will contribute to increase work-trip congestion outside existing gateway market areas.

Orange County – From a geographic perspective, most future housing planned within the County is relatively convenient to new employment centers envisioned. The future housing supply and its affordability, however, will continue to pose a challenge given the type of housing product emphasized (detached) and suburban densities planned. Increasing the supply of housing at prices that reflect the broad cross-section of employment opportunities remains a fundamental challenge.

Job Creation-Workforce Employment

Riverside County – The Inland Empire accounted for 36.0 percent of total job gains (excluding losses) realized in southern California between 1990 and 2001, with Riverside County representing 53.0 percent of these gains. Despite cost savings related to land and facilities (fixed) and employee wages (labor), incremental job growth (relative to population growth) continues to lag behind incremental growth within coastal employment centers of Southern California. While the local employment base will expand substantially, the workforce population will increase at a faster rate due to immigration and a large number of children entering the workforce. Strong business preference for coastal market settings indicates the need for increased and sustained business attraction efforts.

Orange County – Despite relatively high cost, Orange County accounted for over 28.0 percent of total job gains realized in Southern California between 1990 and 2001. In addition, periodic and temporary oversupplies of industrial and office space have tended to spur fixed cost adjustments and renew coastal market preferences. The County’s attraction as an employment and business center will continue to challenge its ability to provide enough local housing to match demand associated with employment gains.

Home-Work Mobility

Both Counties – A fundamental requirement for sustained economic growth over the next 10 to 20 years is the ability to facilitate movement between home and work. Providing a greater supply of jobs in proximity to working residences is an optimal solution for Riverside County. Providing a greater supply of affordable homes in proximity to worker jobs is an optimal solution for Orange County. Theoretically, each solution is possible. Realistically, economic and political impediments are likely to restrict a wholesale increase in the housing stock of Orange County, and limit changes in preference that now favor coastal settings to conduct business despite cost advantages inherent to inland locations. As result, the jobs-housing gap expected to persist in each respective county (in absolute terms) indicates the need to facilitate more efficient home-work mobility between both economic sub-regions.

The analysis on page 3.9-6 evaluated impacts on housing demand within Orange County. The text in the Final EIR will be revised to add the following sentence to section 3.9-3:

The City of Orange has advised the University that a report currently under preparation (Orange County Council of Governments Inter-Regional Partnership Project) may indicate that a substantial number of future jobs in Orange County will be supported by housing in Riverside County due to the continuing jobs-housing imbalance between these two adjacent counties.

- D-13** The Orange County Projections-2000 (OCP-2000) was adopted by the Orange County Council of Governments (OCCOG) on June 22, 2000. OCP-2000 was developed initially for incorporation in SCAG's growth forecast for the 2001 Regional Transportation Plan (adopted in October 2002). Population, housing, and employment data is projected and adopted in five-year increments from 2005 to 2025 for the 10 Regional Statistical Areas in Orange County. The following table identifies year 2000 housing figures and year 2005 through 2020 housing projections for all 34 Orange County jurisdictions. The table shows that the greatest housing growth in Orange County will occur in the unincorporated portions of the County, the majority of which is located in south Orange County. It is acknowledged that housing growth will occur throughout the County, the continued availability of land in the southern portion of the County will continue to result in greater housing growth in this area.

Jurisdiction	DWELLING UNITS					
	July 2000	July 2005	July 2010	July 2015	July 2020	2020-2000
Anaheim	99,297	101,068	104,651	105,278	105,573	6,276
Brea	13,174	13,909	14,956	15,698	16,422	3,248
Buena Park	24,125	24,483	24,778	25,049	25,342	1,217
Costa Mesa	40,577	40,643	40,873	41,730	42,469	1,892
County Unincorporated	68,089	80,288	101,727	114,727	122,652	54,563
Cypress	16,099	16,344	16,569	16,748	16,892	793
Dana Point	15,789	16,045	16,229	16,334	16,428	639
Fountain Valley	18,624	19,379	19,545	19,702	19,876	1,252
Fullerton	44,709	45,216	46,124	46,852	47,400	2,691
Garden Grove	46,539	46,945	47,102	47,311	47,500	961
Huntington Beach	76,730	78,376	78,937	79,664	79,819	3,089
Irvine	53,750	63,200	64,904	66,686	68,439	14,689
La Habra	19,600	19,735	19,817	19,852	19,891	291
La Palma	5,095	5,095	5,095	5,095	5,095	0
Laguna Beach	13,174	13,253	13,342	13,342	13,349	175
Laguna Hills	10,576	10,585	10,594	10,719	10,724	148
Laguna Niguel	24,000	24,214	24,651	24,683	24,747	747
Laguna Woods	12,711	12,711	12,711	12,711	12,711	0
Lake Forest	20,834	20,946	21,103	21,217	21,228	394
Los Alamitos	4,558	4,579	4,595	4,601	4,606	48
Mission Viejo	33,421	34,740	34,740	34,755	34,789	1,368
Newport Beach	38,374	39,320	40,694	40,992	41,436	3,062
Orange	41,786	43,526	43,574	43,622	43,667	1,881
Placentia	15,633	16,389	16,908	17,199	17,281	1,648
Rancho Santa Margarita	13,823	14,186	14,308	14,343	14,358	535
San Clemente	21,055	22,993	24,577	25,106	25,236	4,181
San Juan Capistrano	11,435	12,060	12,831	13,255	13,430	1,995
Santa Ana	75,083	76,006	76,405	76,724	77,040	1,957
Seal Beach	14,515	14,620	14,635	14,669	14,709	194
Stanton	11,163	11,410	11,981	12,695	13,511	2,348
Tustin	25,160	26,826	27,301	27,679	28,058	2,898
Villa Park	2,032	2,039	2,045	2,051	2,057	25
Westminster	26,792	26,864	26,968	27,051	27,131	339
Yorba Linda	19,682	20,880	21,612	22,290	22,958	3,276
Orange County Total	978,004	1,018,873	1,056,882	1,080,430	1,096,824	118,820

Source: Orange County Projections-2000, Center for Demographic Research at California State University, Fullerton.

The text in the Final EIR has been revised to include the following sentence in sections 3.9-3:

While current housing growth is focused in southern Orange County, it is likely that housing growth will occur more evenly throughout Orange County over the long term as undeveloped land in southern Orange County decreases and redevelopment of urban areas with housing in central and northern Orange County increases.

- D-14** These factors will not alter the conclusions in Chapter 3.9 of the EIR regarding housing impacts. Additional rental housing on these two properties would be considered compatible with, and will likely benefit the proposed project by providing housing opportunities for medical interns, medical residents, and other staff.
- D-15** Section 3.10.1 of the Final EIR has been revised to reflect this updated information regarding staffing of Fire Station 5. This updated information will not change the findings regarding project impacts on Public Services.
- D-16** The project trip percentages at each location are as follows:

Medical Center Drive	30%
Dawn Way	65%
Chapman Ave	5%

- D-17** The project traffic for the a.m. and p.m. for short-range and long-range is provided in the UCI Medical Center LRDP Draft EIR Section 3.11 and Appendix F which includes ICU calculations. These tables provide a comparison of “with” and “without project” turn movements which identify project trips at each location.
- D-18** See response D-7 for a discussion of assumptions and environmental effects related to the Archstone and Pinnacle project proposals. To assist the reader, the following discussion is excerpted from response D-7 to address the assumptions in the WOCS and LRDP Traffic models regarding the Archstone and Pinnacle project sites:

Although these specific project applications were not available, the LRDP project analysis recognized that redevelopment at the former Orange (Pacific Theatre) Drive-In and Cinedome property (also referred to as the “Uptown” area) may occur based on consultation with the City of Orange during preparation of the WOTC and LRDP traffic analysis and review of General Plan land uses assumptions for these parcels. These assumptions are identified in the LRDP DEIR in LRDP Traffic Study Figure B-1, Appendix B (DEIR Volume II – Appendix F).

A comparison between the land use assumptions in West Orange Circulation Study (WOCS) and related LRDP traffic analysis and the proposed Archstone and Pinnacle projects can be made using information contained in Figure B-1 of the LRDP Traffic Analysis and representative trip rates for these two proposed residential projects. The following table compares the assumptions in Table B-1 for WOCS traffic zones 11 (Archstone) and 13 (Pinnacle) with these recently proposed projects for the year 2020:

LAND USE	AMOUNT	ADT TRIP GENERATION
I. WOCS (LRDP)		
Commercial	119 TSF	5,107
Office	2,000 TSF	22,020
TOTAL	1200 TSF	27,127
II. FILED PLANS (ARCHSTONE AND PINNACLE)		
Apartments	462 DU	3,000
Apartments	884 DU	5,740
Office*	60 TSF	661
Hotel*	100 Rooms	823
TOTAL		10,224
* These uses are for the portion of zone 13 outside the Pinnacle project site (existing uses)		
DU – dwelling unit TSF – thousand square feet of floor area		

As indicated in this table, the proposed Archstone and Pinnacle projects would result in a lower trip generation than was assumed in the 2020 LRDP analysis for these two traffic zones. The WOCS assumptions for 2010 are for no new construction in these two zones. Construction and occupancy of these two projects prior to 2010 would result in slightly higher background volumes in 2010, the increase varying by location. This increase in background traffic would have no affect on the findings in the traffic analysis, which indicates that the project has no significant impacts in this time frame. The statement on page 4-1 of the LRDP Traffic report *“the proposed expansion under short-range conditions will generate virtually no additional peak hour trips”* is unchanged by any change in background traffic volumes. Reference to the 2010 Intersection Capacity Utilization (ICU) values in the LRDP Traffic Study shows no significant increases due to the project in this time frame, and such project related incremental differences in ICU values are unchanged by any change in background traffic. The finding that no significant project impacts occur in 2010 would remain unchanged by these two proposed residential projects in these two traffic zones.

As described above, the WOCS model assumed less intense development within traffic zones 11 and 13 for the year 2010 and more intense development assumptions for the year 2020. Nevertheless the findings regarding project level traffic impacts for Phase 1 and full LRDP Implementation remain unchanged.

- D-19** Phase 1 construction will result in the displacement of 418 on-site parking spaces, resulting in 1,172 spaces remaining on-site. The replacement of these 418 spaces will be provided off-site through implementation of options identified in Table 2-12. The four options in Table 2-12 would provide a total of 1,270 spaces. In addition, the UCI Medical Center has recently completed a lease with Equity Partners for an additional 240 spaces at the City Towers site. A combination of the off-site options identified in Table 2-12 and the City Towers site will provide adequate parking capacity to serve Phase 1 construction. Potential impacts from the relocation of onsite parking to the potential offsite parking lots was assessed in the traffic study and Section 3.11 of the Draft EIR.
- D-20** The correct number of off-site parking spaces is 875 as described in Table 2-3 of the Draft EIR.
- D-21** Exhibit 2-11 of Section 2 of the Draft EIR identifies the location of the three onsite parking structures that will serve the LRDP. As described in Table 2-16, it is proposed that 1,600 parking spaces will be constructed in Parking Structure 1 (southeast corner of site), 1,150 spaces will be constructed in Parking Structure 2 (eastern edge at I-5) and 200 spaces will be constructed in the South Parking Structure Addition (Dawn Way). As described in Table 2-11, the Phase 1 project will include 1,172 existing parking spaces, 60 new surface spaces at the Emergency Room, 50 new surface spaces adjacent to the new Hospital, and 150 new surface spaces at the eastern perimeter of the site.
- D-22** As addressed in Section 2 of the Draft EIR, the full implementation of the LRDP assumes that all parking associated with the UCI Medical Center would be provided on the site. Section 4, Alternatives to the Proposed Project, identifies one alternative that would allow for a portion of the parking associated with full implementation to be provided off of the Medical Center campus. As described on page 4-31 of the Draft EIR, this full LRDP implementation alternative assumes that a parking structure would be sited at the southwest corner of the intersection of Manchester Boulevard at Chapman Avenue, immediately west of 200 Manchester Drive, the location of an office building owned by the University. A parking structure in this location would provide approximately 1,600 parking spaces for use by Medical Center faculty and staff. If this project alternative were pursued, this parking structure would be located at the site of the existing surface parking lot serving the office building. No buildings would be displaced should a parking structure be sited in this location.
- D-23** The estimated costs identified in Table 3.11-16 in Section 3.11 of the Draft EIR and in Table 7-1 of the traffic study includes estimates for the one intersection where right-of-way acquisition is expected to be required: Haster Street at Chapman Avenue.
- D-24** The improvement identified at the intersection of The City Drive and Medical Center Way (addition of a second southbound left-turn lane) is the sole responsibility of the proposed project; therefore, this location was not included in the fair share summary (Table 7-3).
- D-25** The transportation costs identified in Table 7-1 were developed using best available information regarding the proposed improvements and standard construction costs. The University will contact the City of Orange to meet and confer to determine the appropriate method for confirming these commitments for fair-share contributions.

D-26 The information cited on page 3.12-2 was provided by the City of Orange Water Department in a letter dated August 12, 2002 (a copy is attached at the end of this response). As stated in this letter “the projected demand for the expansion (UCI Medical Center LRDP) is anticipated to almost double the water usage at the site from an existing 172,000 mgd (120 gpm) to an approximated 329,000 mgd (229 gpm)....This additional demand will be absorbed into the system as a whole.” The letter further states that “There are both groundwater and import waster sources in relative close proximity to the project (within a mile or so) that can currently serve the complex in conjunction with other water sources that comprise the water system.” Please note that the August 12, 2002 letter from the City of Orange includes a typographical error regarding the units of measure for water demand (i.e. units should be gpd (i.e., gallons per day) rather than mgd.)

D-27 The projected water demand for the LRDP is 329,760 gallons per day as described on page 3.12-3 of the Draft EIR. To further ensure that growth within the LRDP is coordinated with water supply provided by the City or Orange Water Department, Mitigation Measure 3.12-1 will be expanded to include:

3.12-1 (b) *Prior to the approval of any LRDP development project beyond Phase 1, the UCI Medical Center shall prepare a project-specific water demand analysis and submit the analysis to the City of Orange Water Department for use in verifying adequate water supply for the project.*

D-28 The comment is hereby noted.



CITY OF ORANGE

DEPARTMENT PUBLIC WORKS

ENGINEERING DIVISION
(714) 744-5544
FAX: (714) 744-6961

STREET DIVISION
(714) 532-8480
FAX: (714) 532-6444

TRAFFIC DIVISION
(714) 744-5540
FAX: (714) 744-6961

WATER DIVISION
(714) 288-2475
FAX: (714) 744-2973

August 12, 2002

VIA TELECOPIER
(949-824-1213)

Jim Lawson
UCI Campus and Environmental Planning

**RE: UCI Medical Center Expansion S/W/C Chapman and City Drive
Projected Water Requirements**

Dear Mr. Lawson

In response to your inquiry we offer the following information.

The City of Orange Water Department is the water purveyor for your project and currently supplies the existing UCI Medical Complex located at the S/W/C of Chapman Avenue and City Drive, in Orange. The City of Orange's water sources are (and remain) a blend of both groundwater (well) and treated import water. In general, groundwater sources (well water) provide 75% of the water provided to the City water system as a whole. The Orange County Water District administers the overall management of the groundwater basin, which serves the city of Orange and most of Orange County.

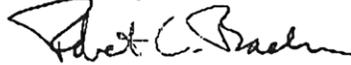
Import water sources comprise 25% of the total water supplied to the city water system. The Municipal Water District of Orange County (MWDOC) oversees the delivery of the majority of water imported to the city through facilities owned by the Metropolitan Water District of Southern California.

The City has an extensive City dedicated water system serving the existing medical complex, which utilizes multiple connections to water transmission mains surrounding the site. The projected demand for the expansion is anticipated to almost double the water usage at the site from and an existing 172,000 mgd (120 gpm) to an approximated 329,000 mgd (229 gpm). The additional required demand comprises approximately half a percent (0.5%) additional demand on the city water system as a whole. This additional demand will be absorbed into the system as a whole.

There are both groundwater and import water sources in relative close proximity to the project (within a mile or so) that can currently serve the complex in conjunction with other water sources that comprise the water system. The City continues to pursue expanding the ground water sources (along with other necessary infrastructure) and is currently constructing a new ground water well located at the Orange Block that should be operational in approximately two years.

If you need further information or have questions or comments, please do not hesitate to contact me at (714) 288-2475.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert C. Baehner". The signature is fluid and cursive, with the first name "Robert" being the most prominent.

Robert C. Baehner, PE
Principal Civil Engineer

cc: Steve Smith, Water Manager
Ramona Takahashi, Assistant Engineer



December 2, 2002

Richard Demerjian
Director, UCI Office of Campus and Environmental Planning
750 University Tower
Irvine, CA 92697-2325

**Subject: University of California, Irvine Medical Center Long Range
Development Plan DEIR Vol. I,II**

Dear Mr. Demerjian:

The Orange County Transportation Authority (OCTA) has reviewed the above
referenced document and has the following comments:

E-1



The existing Average Daily Traffic (ADT) of 35,000 on Chapman Avenue east of
City Drive (Exhibit 3.11-3) appears to reflect conditions prior to the widening of
Chapman Avenue and the completion of construction on I-5, and is significantly
lower than current (2001) counts provided by the City of Orange (42,000 ADT
for the same segment). In addition, the Short Range plus Phase I ADT
projection of 37,000 ADT (Exhibit 3.11-10) is also lower than the 2001 counts.
As a result, the projected long range impacts appear to be understated. OCTA
respectfully requests that the traffic model be re-run using current (2001 or
2002) counts for the base year.

Please contact me with questions or comments at 714-560-5749 or
cwright@octa.net.

OCTA appreciates the opportunity to review and comment on this project.

Sincerely,

Christopher Wright
Associate Transportation Analyst

Response to Comment Letter E – Orange County Transportation Authority

E-1 The comment is correct in noting that the 35,000 ADT on Chapman Avenue east of The City Drive reflects conditions prior to widening of Chapman Avenue and completion of the I-5 construction. Comparison ADT volumes taken in November 2002 are as follows for the four legs of the intersection of State College/The City Drive and Chapman:

LOCATION	2000	2002
Chapman west of The City Drive	35,000	39,000
Chapman east of The City Drive	35,000	42,000
State College north of Chapman	32,000	31,000
The City Drive south of Chapman	31,000	34,000

Total traffic entering the intersection is approximately 10 percent higher in 2002 versus 2000, and volumes on each leg of the intersection show individual differences. Comparison of volumes for 2010 and 2025 with the 2002 data (and network configuration) as a base would be as follows:

LOCATION	----- 2010 -----		----- 2020 -----	
	PREVIOUS	REVISED	PREVIOUS	REVISED
Chapman west of The City Drive	37,000	40,000	36,000	39,000
Chapman east of The City Drive	36,000	42,000	38,000	44,000
State College north of Chapman	38,000	34,000	43,000	39,000
The City Drive south of Chapman	39,000	41,000	45,000	47,000

Under the revised volumes, the ICUs for the intersection are approximately five percent higher for 2010 and four percent higher for 2020, which does not change the findings of the peak hour analysis.

DEPARTMENT OF TRANSPORTATION

District 12
3337 Michelson Drive, Suite 380
Irvine, CA 92612-8894

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DEC 02 2002

UCI Campus & Environmental Planning



*Flex your power!
Be energy efficient!*

Mail and Fax

November 26, 2002

Mr. Richard Demerjian
University of California
750 University Tower
Irvine, CA 92697

File: IGR/CEQA
SCH#: 2000021111
Log #: 1159
SR #: 57 & 22 & I-5

Subject: Draft Environmental Impact Report for University of California Medical Center, Long Range Development Plan

Dear Mr. Demerjian,

F-1

Thank you for the opportunity to review and comment on the **Draft Environmental Impact Report for University of California Medical Center, Long Range Development Plan** dated October 18, 2002. The project is located at 101 The City Drive South in the City of Orange, Orange County, California. The Medical Center site is bound by Chapman Avenue to the north, Dawn Way to the south, I-5 to the east and SR 22 to the west. Regional access to the Medical Center is provided by I-5, SR 22 and SR 57.

Caltrans District 12 status is a responsible agency on this project, and has the following comments:

F-2

1. If any project work (e.g. storage of materials, street widening, emergency access improvements, sewer connections, sound walls, stormdrain construction, street connections, etc.) that occurs in the vicinity of the Caltrans Right-of-Way, an encroachment permit would be required and environmental concerns must be adequately addressed. If the environmental documentation for the project does not meet Caltrans requirements, additional documentation (e.g. Native American Heritage Commission consultation for cultural resources) would be required before approval of the encroachment permit. Please coordinate with Caltrans to meet requirements for any work within or near Caltrans Right-of-Way. **(See Attachment: Environmental Review Requirements for Encroachment Permits)**

F-3

2. All work within the State Right of Way must conform to Caltrans Standard Plans and Standard Specifications for Water Pollution Control, including production of a Water Pollution Control Program (WPCP) or Storm Water Pollution Prevention Plan (SWPPP) as required. Any runoff draining into Caltrans right-of-way from construction operations, or from the resulting project, cannot be approved by District 12 Environmental Planning. Measures must be incorporated to contain all vehicle loads and avoid any tracking of materials, which may fall or blow onto Caltrans roadways or facilities. **(See Attachment: Water Pollution Control Provisions)**

F-4

3. Transportation and Traffic Study has not been completed in this DEIR. This medical center will significantly impact The City Drive/SR 22 EB ramps and downgrade the level of service from existing C to F (failure condition) during afternoon peak hours in year 2020 (see Table 3.11-15, #27). In this report, mitigation measures are not discussed and provided for this impact. The costs and financial responsibilities are not addressed either. In order to protect SR 22 and keep it in an acceptable level of service, those issues need to be addressed in details in the Final Environmental Report for Caltrans to review.

Please continue to keep us informed of future developments, which could potentially impact the transportation facilities. If you have any questions or need to contact us, please do not hesitate to call Lan Zhou at (949) 756-7827.

Sincerely,

A handwritten signature in black ink that reads "Robert F. Joseph" with a long horizontal flourish extending to the right.

Robert F. Joseph, Chief
Advanced Planning Branch

c: Terry Roberts, Office of Planning and Research
Ron Helgeson, Caltrans HQ IGR/Community Planning
Saied Hashemi, Traffic Operations
Leslie Manderscheid, Environmental Planning

ENVIRONMENTAL REVIEW REQUIREMENTS FOR ENCROACHMENT PERMITS

Any Party, outside of Caltrans, that does work on a State Highway or Interstate Highway in California needs to apply for an encroachment permit. To acquire any encroachment permit, environmental concerns must be addressed. Environmental review of encroachment permit applications may take 3 weeks if the application is complete or longer if the application is incomplete. For soil disturbing activities (e.g. geotechnical borings, grading, use of unpaved roads from which dirt and other materials may be tracked onto the State/Interstate highways, etc.), compliance with Water Quality and Cultural Resources Provisions are emphasized. Surveys may/ may not be soil-disturbing activities, depending on the site and survey method.

A complete application for environmental review includes the following:

1. If an environmental document (CE, EIR/EIS, ND, etc.) has been completed for the project, copy of the final, approved document must be submitted with the application.
2. **Water Quality Provision:** All work within the State Right of Way must conform to Caltrans Standard Plans and Standard Specifications for Water Pollution Control including production of a Water Pollution Control Program or Storm Water Pollution Prevention Plan as required. The applicant must provide Encroachments with a copy of the Storm Water Pollution Prevention Plan (SWPPP) including Best Management Practices (BMPs) to be implemented for construction activities impacting Caltrans Right of Way, prepared for this as required by the NPDES Statewide Storm Water Permit for General Construction Activities. If no SWPPP has been prepared for this project, then the applicant must follow the requirements described in the attached Water Pollution Control Provisions (please see attachment).
3. **Cultural Resources Provisions:** If not included in the environmental document, before permit approval and project construction, the encroachment permit applicant must complete a Cultural Resource Assessment pursuant to Caltrans Environmental Handbook, Volume 2, Appendix B-1, and Exhibit 1, as amended. The Cultural Resources Assessment ascertains the presence or absence of cultural resources within a one-mile radius of the project area and evaluates the impact to any historical/cultural resource. Cultural Resources include "those resources significant in American history, architecture, archaeology, and culture, including Native American Resources" (Caltrans Environmental Handbook, Volume 2, Chapter 1, as amended). The Cultural Resource Assessment must include:
 - a) a clear project description and map indicating project work, staging areas, site access, etc.;
 - b) a Record Search conducted at the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton. For information call (714) 278-5395;
 - c) proof of Native American consultation. Consultation involves contacting the Native American Heritage Commission (NAHC), requesting a search of their Sacred Lands File, and following the recommendations provided by the NAHC. For information call (916) 653-4082;
 - d) documentation of any historic properties (e.g. prehistoric and historic sites, buildings, structures, objects, or districts listed on, eligible for, or potentially eligible for listing on the National Register of Historic Places) within a one mile radius of the project area;
 - e) and a survey by qualified archaeologist for all areas that have not been previously researched.

The SCCIC and NAHC have an approximate turn around time of 2 weeks.

4. **Biological Resources Provisions:** Work conducted within Caltrans Right of Way should have the appropriate plant and wildlife surveys completed by a qualified biologist. If the information is not included in the environmental document, Environmental Planning requests that the applicant submit a copy of the biological study, survey, or technical report by a qualified biologist that provides details on the existing vegetation and wildlife at the project site and any vegetation that is to be removed during project activities. Official lists and databases should also be consulted for sensitive species such as the California Natural Diversity Database and lists provided by the U.S. Fish and Wildlife Service and the California Department of Fish and Game. Any impacts that affect waterways and drainages and/or open space during construction, or that occur indirectly as a result of the project must be coordinated with the appropriate resource agencies. As guidance, we ask that the applicant include:
 - a) clear description of project activities and the project site
 - b) completed environmental significance checklist (not just yes and no answers, but a description should be given as to the reason for the response),
 - c) staging/storage areas noted on project plans,
 - d) proposed time of year for work and duration of activities (with information available),
 - e) any proposed mitigation (if applicable to the project),
 - f) and a record of any prior resource agency correspondence (if applicable to the project).

ATTACHMENT CALTRANS DISTRICT 12

WATER POLLUTION CONTROL PROVISIONS

Any runoff draining into Caltrans Right of Way must fully conform to the current discharge requirements of the Regional Water Quality Control Board (RWQCB) to avoid impacting water quality. Permittee shall fully conform to the requirements of the Caltrans Statewide National Pollutant Discharge Elimination System (NPDES) Storm Water Permit, Order No. 99-06-DWQ, NPDES No. CAS000003, adopted by the State Water Resources Control Board (SWRCB) on July 15, 1999, in addition to the BMPs specified in the Caltrans Storm Water Management Plan (SWMP). When applicable, the Permittee will also conform to the requirements of the General NPDES Permit for Construction Activities, Order No. 99-08-DWQ, NPDES No. CAS000002, and any subsequent General Permit in effect at the time of issuance of this Encroachment Permit. These permits regulate storm water and non-storm water discharges associated with year-round construction activities.

Please note that project activities should pay extra attention to storm water pollution control during the "Rainy Season" (October 1st – May 1st) and follow the Water Pollution Control BMPs to minimize impact to receiving waters. Measures must be incorporated to contain all vehicle loads and avoid any tracking of materials, which may fall or blow onto Caltrans Right of Way.

For all projects resulting in 2 hectares (5 acres) or more of soil disturbance or otherwise subject to the NPDES program, the Contractor will develop, implement, and maintain a Storm Water Pollution Prevention Plan (SWPPP) conforming to the requirements of the Caltrans Specification Section 7-1.01G "Water Pollution Control", Caltrans Statewide NPDES Permit, the General NPDES Permit for Construction Activities, and the Caltrans Storm Water Quality Handbooks "Storm Water Pollution Prevention Plan (SWPPP) and Water Pollution Control Program (WPCP) Preparation Manual", and "Construction Site Best Management Practices (BMPs) Manual" effective November 2000, and subsequent revisions. In addition, the SWPPP must conform to the requirements of the SWRCB Resolution No. 2001-046, the Sampling and Analytical Procedures (SAP) Plan.

For all projects resulting in less than 2 hectares (5 acres) of soil disturbance or not otherwise subject to the requirements of the NPDES program, the Contractor will develop, implement, and maintain a Water Pollution Control Program (WPCP) conforming to the requirements of Caltrans Specifications Section 7-1-.01G, "Water Pollution Control", and the Caltrans Storm Water Quality Handbooks "Storm Water Pollution Prevention Plan (SWPPP) and Water Pollution Control Program (WPCP) Preparation Manual", and "Construction Site Best Management Practices (BMPs) Manual" effective November 2000, and subsequent revisions.

Copies of the Permits and the Construction Contractor's Guide and Specifications of the Caltrans Storm Water Quality Handbook may be obtained from the Department of Transportation, Material Operations Branch, Publication Distribution Unit, 1900 Royal Oaks Drive, Sacramento, California 95815, Telephone: (916) 445-3520. Copies of the Permits and Handbook are also available for review at Caltrans District 12, 3347 Michelson Drive, Suite 100, Irvine, California 92612, Telephone: (949) 724-2260. Electronic copies can be found at <http://www.dot.ca.gov/hq/construc/stormwater.html>

Response to Letter F – California Department of Transportation

- F-1** The comment is hereby noted.
- F-2** Any project-related work occurring in Caltrans right-of-way will be performed in consultation with Caltrans and will conform to Caltrans permit requirements.
- F-3** Any project-related work performed within Caltrans right-of-way will conform to Caltrans standards for water quality control.
- F-4** The completed Traffic Analysis was contained in DEIR Volume II – Appendix F. The Draft EIR does note that project will have a significant impact on the intersection of The City Drive at SR-22 eastbound ramps, which will operate at LOS “F” under long-range conditions during the PM peak hour. The SR-22 Freeway improvement project includes the addition of a southbound free right-turn at the SR-22 eastbound ramps which will improve the intersection to an acceptable level of service under long-range conditions.

IV. MITIGATION MONITORING PROGRAM

A. INTRODUCTION

The California Environmental Quality Act (CEQA) requires the adoption of feasible mitigation measures to reduce the severity and magnitude of potentially significant environmental impacts associated with project development. The Final Environmental Impact Report (Final EIR) for the University of California, Irvine Medical Center Long Range Development Plan (State Clearinghouse No. 2000021111) includes project-specific mitigation measures to reduce the potential environmental effects of the proposed project.

Monitoring the implementation of adopted mitigation measures is required by Public Resources Code Section 21081.6. The Final EIR for the proposed project provides a list of mitigation measures, and describes the process whereby the mitigation measures would be monitored. Following certification of the Final EIR and approval of the Mitigation Monitoring Program (MMP) by The Regents, the mitigation measures included in the Final EIR would be monitored as described in this Mitigation Monitoring Program.

The purpose of the University of California, Irvine Medical Center Long Range Development Plan project Mitigation Monitoring Program is to ensure compliance with all mitigation measures to mitigate or avoid potentially significant adverse environmental impacts resulting from the proposed project which were identified in the Final EIR. The implementation of this MMP shall be the responsibility of the UCIMC and the UCI campus. Mitigation measures will be implemented: 1) as part of project-specific CEQA analysis; 2) prior to approval of the final design by The Regents or their designate; 3) during project construction (as required in construction contract specifications); or 4) as part of project operations or ongoing campus practice.

In general, monitoring will consist of demonstrating that mitigation measures were implemented, and that the responsible units monitored the implementation of the measures. Monitoring will consist of determining whether:

- Specific issues were considered in the project-specific CEQA analysis;
- Specific issues were considered in the design development phase;

- Construction contracts included the specified provisions;
- Certain actions occurred prior to or during construction; and
- Ongoing administrative activities included the identified provisions.

B. LIST OF MITIGATION MEASURES

All LRDP mitigation measures included in the Final EIR for the proposed project would be monitored as described above. These measures are listed in Table IV-1.

**Table IV-1
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM**

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
3.1 Aesthetics			
3.1-1 As a part of site design associated with full LRDP implementation, the UCI Medical Center shall address and implement an option(s) to reduce visual effects associated with the siting of a seven-story parking structure adjacent to the Orange County Juvenile Hall facility. These options include, but are not limited to, relocation of the parking structure within the UCI Medical Center campus, reduction in parking structure height, and visual buffering of the uses.	PO, D&CS	CEQA, Design	1
3.1-3 Prior to the completion final construction documents, the UCI Medical Center shall ensure that Medical Center projects use low-reflective materials on buildings and parking structures that do not promote glare to the greatest extent feasible.	PO, D&CS	CEQA, Design	1
3.2 Air Quality			
3.2-1(a) Prior to construction, the UCI Medical Center shall implement the following measures to reduce impacts of ozone precursor emissions from construction equipment exhaust. (1) In order to reduce diesel fuel engine emissions, the UCI Medical Center shall require that all construction bid packages include a separate "Diesel Fuel Reduction Plan." This plan shall identify the actions to be taken to reduce diesel fuel emissions during construction activities (inclusive of grading, demolition, and excavation activities). Reductions in diesel fuel emissions can be achieved by measures including, but not limited to, the following: a) use of alternative energy sources, such as compressed natural gas or liquefied petroleum gas, in mobile equipment and vehicles; b) use of "retrofit technology," including diesel particulate traps, on existing diesel engines and vehicles; c) other appropriate measures. (2) Turn equipment off when not in use for more than five minutes.	D&CS	Construction	1

Responsible Units:

PO – UCIMC Planning Office
D&CS – UCI Design & Construction Services

Mitigation Timing:

CEQA – Implement as part of project-specific CEQA analysis
Design – Incorporate into project-specific design
Construction – Implement during construction of specific projects
Ongoing – Implement as an ongoing campus practice

Compliance Action:

1. Project Level
2. Service Level
3. Administrative Measure

**Table IV-1 (Continued)
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM**

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
3.2-2 To reduce emissions associated with full LRDP implementation project-related vehicle trips, the UCI Medical Center shall prepare, prior to occupancy of the Phase I project, a Transportation Demand Management Program to reduce vehicle miles traveled to the maximum extent feasible. Such measures can include: a. Preferential parking for carpool vehicles b. Bicycle parking and shower facilities c. Information provided to employees on transportation alternatives d. Rideshare vehicle loading areas e. Vanpool vehicle accessibility f. Bus stop improvements	PO	Construction	3
3.2-4(a) Prior to the completion of final construction documents, the UCI Medical Center shall conduct a wind/fume discharge study, for facilities that include fume hoods, to determine whether the desired fume exhaust stack height must be greater than seven feet. The wind/fume discharge study shall address the relationship between fresh air intake and exhaust fume stacks for individual development projects at the UCI Medical Center, as well as its relationship to other existing facilities on the campus. The analysis will determine acceptable intake and exhaust positions to ensure that these projects are in conformance with emission regulations.	D&CS	Design	1

Responsible Units:

PO – UCIMC Planning Office
 D&CS – UCI Design & Construction Services

Mitigation Timing:

CEQA – Implement as part of project-specific CEQA analysis
 Design – Incorporate into project-specific design
 Construction – Implement during construction of specific projects
 Ongoing – Implement as an ongoing campus practice

Compliance Action:

1. Project Level
 2. Service Level
 3. Administrative Measure

**Table IV-1 (Continued)
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM**

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
3.4 Cultural Resources			
<p>3.3-3 A Register of Professional Archaeologists-certified archaeologist shall be retained to perform periodic project-specific inspections of ground disturbing activities. The archaeologist shall be allowed to divert or direct grading in the areas of resources in order to facilitate evaluation and, if necessary, salvage any buried artifacts that may be uncovered.</p> <p>a. A final monitoring report, including an itemized inventory and pertinent field data, shall be sent to the University of California and to the South Central Coastal Information Center at California State University at Fullerton following the completion of each construction project.</p> <p>b. Any recovered prehistoric and historic artifacts shall be offered, on a first right-of-refusal basis, to a repository with a retrievable collection system and an educational and research interest in the materials such as the Fowler Museum of Cultural History (UCLA) or California State University, Fullerton, or alternatively to the Pacific Coast Archaeological Society where collections are held locally.</p>	D&CS	Construction	1
<p>3.3-4 A qualified paleontologist shall be retained to perform periodic project-specific inspections of excavations and salvage exposed fossils. The paleontologist shall be allowed to divert or direct grading in the areas of an exposed fossil in order to facilitate evaluation and, if necessary, salvage the exposed fossil.</p> <p>a. During monitoring, any scientifically significant specimens shall be properly salvaged after evaluation by, and under the supervision of, the paleontologist. During fossil salvage, contextual stratigraphic data shall also be collected. This will include lithologic descriptions, localities plotted on a USGS 7.5' Series topographic quadrangle, photographs, and field notes.</p> <p>b. Specimens shall be prepared to the point of identification, identified, and curated on a long-term loan basis in a suitable repository that has a</p>	D&CS	Construction	1

Responsible Units:

PO – UCIMC Planning Office
D&CS – UCI Design & Construction Services

Mitigation Timing:

CEQA – Implement as part of project-specific CEQA analysis
Design – Incorporate into project-specific design
Construction – Implement during construction of specific projects
Ongoing – Implement as an ongoing campus practice

Compliance Action:

1. Project Level
2. Service Level
3. Administrative Measure

**Table IV-1 (Continued)
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM**

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
<p>retrievable storage system, such as the Los Angeles County Museum of Natural History.</p> <p>c. A final report shall be prepared at the end of earthmoving activities for each construction project, and shall include an itemized inventory of recovered fossils and appropriate stratigraphic and locality data. This report shall be sent to the University of California to signify the end of mitigation. Another copy shall accompany any recovered fossils, along with field logs and photographs, to the designated repository.</p>			
4.5 Geology and Soils			
<p>3.4-3(a) The UCI Medical Center shall construct interceptor ditches and diversion dikes to divert runoff away from graded areas during the implementation of the project.</p>	D&CS	Construction	1
<p>3.4-3(b) Erosion control during construction activities shall be maximized to the extent feasible; adequate erosion control methods may include, but are not limited to the following:</p> <p>(1) During construction, soil on any graded slopes shall be revegetated where feasible.</p> <p>(2) During grading or before any landscape areas have established root, straw, wood chips, or plastic shall be used to stabilize the ground.</p> <p>(3) Air-born and vehicle-born sediment shall be controlled during construction by the regular sprinkling of exposed soils; the moistening of vehicle loads; and by providing gravel and paved driveways between the construction site(s) and public streets.</p> <p>(4) Sediment shall be removed from storm flows with sediment filters, before the runoff leaves the construction site.</p> <p>(5) During the period of construction activity, vegetation shall be protected from traffic by the use of fences. Buffer strips of vegetative filter strips, such as tall strands of grass, shall be used to protect against sediment buildup.</p>	D&CS	Construction	1

Responsible Units:

PO – UCIMC Planning Office
D&CS – UCI Design & Construction Services

Mitigation Timing:

CEQA – Implement as part of project-specific CEQA analysis
Design – Incorporate into project-specific design
Construction – Implement during construction of specific projects
Ongoing – Implement as an ongoing campus practice

Compliance Action:

1. Project Level
2. Service Level
3. Administrative Measure

**Table IV-1 (Continued)
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM**

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
(6) Street sweeping services will be required for to maintain the quality of surface water being discharged.			
3.4-3(c) After individual construction projects are completed, the following measures, as applicable, shall be observed in order to protect and promote landscaping at the UCI Medical Center as a form of erosion control: (1) Landscaping shall be placed along manufactured slopes, drainageways, or other disturbed areas which are subject to sheet flows. (2) Mulch shall be added to topsoil prior to landscaping, to reduce the erosive force of raindrops and encourage plant establishment. (3) In areas where soil is inhospitable to plant growth, topsoiling shall be used to create a medium more suitable for landscaping. (4) Slopes shall be scarified or grooved to aid in the establishment of vegetative cover from seed, and to reduce slope runoff velocity.	D&CS	Design	1
3.4-3(d) If construction occurs between the period of October 15 to April 15, the UCI Medical Center shall implement project-specific erosion control measures to control any runoff from construction site.	D&CS	Construction	1
3.4-3(e) The level of construction site sediment and the velocity of sheet flows shall be minimized by the use of sandbag, gravel bag, or straw bale barriers. The barriers shall be placed around drainage inlets. Due to the short life expectancy of these barriers (i.e., one rainy season), these shall be used only where other measures of sediment control are not possible.	D&CS	Construction	1
3.4-3(f) To reduce/eliminate mud and sediment carried by vehicles or runoff onto public right-of-ways, a temporary gravel entrance shall be located at every construction site entrance, where needed. The gravel shall cover the entire width of the entrance, and its length shall be no less than 50 feet.	D&CS	Construction	1

Responsible Units:

PO – UCIMC Planning Office
D&CS – UCI Design & Construction Services

Mitigation Timing:

CEQA – Implement as part of project-specific CEQA analysis
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Compliance Action:

1. Project Level
2. Service Level
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Table IV-1 (Continued)
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
3.4-3(g) Filter berms, consisting of a ridge of gravel, shall be placed across graded right-of-ways to decrease and filter runoff levels while permitting construction traffic to continue. Prior to the stabilization of the construction site area, sediment flows shall be prevented from entering storm drainage systems by the construction of temporary filter inlets around existing storm drain inlets. The sediment trapped in these impounding areas shall be removed after each storm.	D&CS	Construction	1
3.4-4(a) Preliminary plans for new major capital improvement projects, except pre-engineered buildings, wood-framed buildings of less than 3,000 square feet, and buildings not intended for human occupancy other than hospitals proposed for construction shall be examined by the consulting structural engineer, who shall prepare recommendations regarding any special criteria that, in that engineer's opinion, should be recognized in providing adequate resistance to seismic forces to minimize the risk of injury to persons and damage to property. Upon completion of the final plans, the consulting structural engineer shall review the plans and structural calculations for completeness, general accuracy, structural details, and for compliance with any special criteria previously established. Should seismic design standards be revised during the period between completion of final plans and the date of advertisement for bids, the consulting structural engineer shall review again the plans and structural calculations before advertising for bids. The design structural engineer shall incorporate comments into the plans, where feasible, prior to bidding.	D&CS	Design	1
3.4-4(b) Prior to the release of construction funds for structures other than hospital or for seismic rehabilitation projects, a letter or report from the campus consulting structural engineer shall be submitted, stating that the construction plans are in general conformance with the University policy on seismic safety. The design and construction of new facilities or alterations for hospitals, skilled nursing facilities, and intermediate-care facilities as defined in Section 15001 of the California Health and Safety Code, on University premises or under University operation shall comply with CCR, Title 24, California Building Standards Code.	D&CS	Design	1

Responsible Units:

PO – UCIMC Planning Office
 D&CS – UCI Design & Construction Services

Mitigation Timing:

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Compliance Action:

1. Project Level
2. Service Level
3. Administrative Measure

**Table IV-1 (Continued)
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM**

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
3.5 Hazards and Hazardous Materials			
<p>3.5-2(a) Prior to demolition activities at each location, the UCI Medical Center shall develop a decommissioning plan for facilities known or suspected to contain hazardous materials in building features including, but not limited to, exterior surfaces such as rooftops and stacks, and interior features such as floors, walls, ceilings, countertops, and storage areas, and plumbing and ventilation fixtures. Potential contaminants to be evaluated shall include, but not be limited to, the following: friable asbestos, lead-based paint, mercury or other chemical substances, Polychlorinated Biphenyls (PCBs), radioactive materials, and biohazardous materials. The decommissioning plan shall identify, at a minimum, the following information:</p> <ul style="list-style-type: none"> (1) the location, type, and estimated amount of exterior and interior features known or suspected to contain contaminants. Measures to evaluate the potential for contaminants to be present could include, but would not be limited to, a review of departmental history, UCI Medical Center records pertaining to use, hazardous materials purchases, consultation with knowledgeable individuals, and sample collection where practical; (2) specific tasks that would be performed to determine the type, location, and amount of contaminants that could be present; (3) a mechanism for ensuring removal of contaminated items in compliance with all applicable hazardous materials management laws and regulations. Such measures could include identification fo individuals or companies permitted or licensed to handle the contaminants, procedures, contract specifications, periodic monitoring during demolition, and documentation of activities; (4) for each affected location, health and safety precautions that meet the intent of California Occupational Safety and Health Administration (Cal/OSHA) requirements shall be developed and identified in the decommissioning plan; and 	D&CS	Design	1

Responsible Units:

PO – UCIMC Planning Office
D&CS – UCI Design & Construction Services

Mitigation Timing:

CEQA – Implement as part of project-specific CEQA analysis
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Ongoing – Implement as an ongoing campus practice

Compliance Action:

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**Table IV-1 (Continued)
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM**

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
(5) the decommissioning plan shall identify specific steps that will be taken to account for and relocate all stored chemical and radioactive wastes and other hazardous wastes and other hazardous substances used in routine operations. This mitigation would occur during the design phase.			
3.5-2(b) The UCI Medical Center, through its contractor or designee, shall ensure proper implementation of all demolition activities in which hazardous wastes may be encountered.	D&CS	Construction	1
3.5-2(c) In the event unidentified, obvious, or suspected hazardous materials or contamination are discovered during decommissioning or demolition, such activities shall cease immediately until evaluated by a qualified health and safety professional. Work shall not continue until appropriate actions recommended by the health and safety professional have been implemented to demonstrated that there would be no unacceptable health risk to exposed individuals.	D&CS	Construction	1
3.5-2(d) All buildings shall be tested by a registered environmental assessor for the presence of lead-based paint prior to demolition. If lead-based paint is detected, the material shall be removed and transported to an approved waste disposal facility in accordance with the requirements of the County of Orange Health Care Agency.	D&CS	Construction	1
3.5-4(a) Prior to final construction documents, in conjunction with building surveys (required to comply with asbestos and lead abatement recommendations, and as required by standard conditions and Mitigation Measures 3.5-2(a) through 3.5-2(d)), the UCI Medical Center shall estimate the amount of demolition debris and residues (including, but not limited to, building materials, fixtures, containers, and soils) that would need to be disposed of as hazardous waste.	D&CS	Construction	1

Responsible Units:

PO – UCIMC Planning Office
D&CS – UCI Design & Construction Services

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Table IV-1 (Continued)
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
3.5-4(b) Prior to demolition, or prior to site preparation that could generate contaminated soils, the UCI Medical Center shall identify waste-segregation and processing activities that would minimize the amount of hazardous waste generated. Waste reduction measures for hazardous building debris may include, but are not limited to, shredding, compaction, and other measures to reduce waste volume.	D&CS	Construction	1
3.5-4(c) Prior to demolition which could result in the generation of hazardous chemical waste, or prior to site preparation that could generate contaminated soils, the campus shall identify appropriate disposal sites and confirm that these sites will have sufficient capacity to accept the waste at the time the waste is generated. In the event disposal site options are not available or capacity is limited, the campus shall redesign the demolition activity or delay demolition of the affected building until a disposal option is identified.	D&CS	Construction	1
3.5-4(d) Prior to demolition of the first building that could generate low-level radioactive waste, in the event an offsite disposal facility for low-level radioactive waste has not been identified, the UCI Medical Center shall coordinate with the California DHS Radiologic Health Branch to identify appropriate options that could be implemented to provide sufficient and secured space to accommodate the interim storage of the waste until the waste can be transported to a licensed facility. Such options could include onsite storage or transport to an offsite temporary storage location. If one of these options (or another option) is identified, the UCI Medical Center shall prepare a management plan that would include, but not be limited to, the following: identification of types and quantities of wastes to be stored; transportation procedures; site security; monitoring and inspection procedures; emergency response measures; and administrative responsibilities, including amendments to the Radioactive Materials License, if necessary. Appropriate environmental documentation shall also be prepared prior to approval of the selected storage option. In the event appropriate	D&CS	Construction	1

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PO – UCIMC Planning Office
 D&CS – UCI Design & Construction Services

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**Table IV-1 (Continued)
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM**

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
storage or disposal options cannot be identified, the UCI Medical Center shall redesign the demolition activity to reduce the amount of waste or delay demolition of the affected building until a storage/disposal option is identified.			
3.5-5(a) Prior to any demolition or construction activity, the UCI Medical Center shall evaluate the site to determine the appropriate level of investigation that would be required to assess the possible presence of hazardous chemical and radioactive materials in soil and groundwater. Investigative measures could include, but would not be limited to, a review of historic maps and aerial photographs; Sanborn maps; review of available campus, city, county, and state records; and consultation with knowledgeable individuals. In the event soil and/or groundwater testing is deemed appropriate, the campus shall ensure the testing is performed in accordance with professional standards for such evaluations, using appropriate EPA testing methods. The UCI Medical Center shall evaluate the results and implement recommended actions. The Medical Center shall document the results of all investigations and shall notify the appropriate local or state agencies in the event contaminants are detected at levels that could present a human health or environmental risk.	D&CS	Construction	1
3.5-5(b) In the event that testing finds evidence of contamination, waste discharges, underground storage tanks, hazardous debris, or other environmental impairment at locations to be developed, a risk management plan shall be prepared by the UCIMC prior to construction at that location that: (1) identifies the contaminants of concern and potential risk each contaminant would pose to human health and the environment during construction and post-development; and (2) describes measures to be taken to protect workers and the public from exposure to potential site hazards. Such measures could include a range of options, including, but not limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof.	D&CS	Construction	1

Responsible Units:

PO – UCIMC Planning Office
D&CS – UCI Design & Construction Services

Mitigation Timing:

CEQA – Implement as part of project-specific CEQA analysis
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**Table IV-1 (Continued)
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM**

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
3.5-5(c) For locations where remediation is determined to be necessary to reduce contaminant concentrations to levels that would not exceed risk-based criteria appropriate to that location, commencement of construction in the areas of potential hazard shall not proceed until a site remediation plan has been completed. Depending on the nature of contamination, if any, appropriate agencies shall be notified (e.g., the Regional Water Quality Control Board for groundwater contamination).	D&CS	Construction	1
3.5-5(d) A site health and safety plan, which meets California Occupational Safety and Health Administration (Cal/OSHA) requirements, shall be prepared and in place prior to commencing work on any contaminated sites. The UCI Medical Center, through its contractor, shall ensure proper implementation of the health and safety plan.	D&CS	Construction	1
3.5-5(e) In the event of obvious or suspected contamination in underground tanks or other features or materials that could present a threat to human health or the environment are discovered, construction in that immediate area shall cease immediately. A qualified professional shall evaluate the find and make appropriate recommendations. Work shall not commence at the site until appropriate actions have been implemented to demonstrate that there would be no unacceptable health risk to exposed individuals or the environment.	D&CS	Construction	1

Responsible Units:

PO – UCIMC Planning Office
D&CS – UCI Design & Construction Services

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Compliance Action:

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**Table IV-1 (Continued)
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM**

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
3.6 Hydrology and Water Quality			
3.6-1 Prior to design approval, the UCI Medical Center shall be responsible for the preparation of a hydrological analysis to determine the quantity of runoff associated with development of the Caltrans lot as a surface parking facility and if the existing storm drain system can accommodate the additional runoff without adversely impacting existing and planned development flows. If the project would adversely affect the storm drain system, the UCI Medical Center shall be responsible for project-related improvements to ensure potential impacts are mitigated to a less than significant level. Improvement options include offsite improvements or increasing the size of the onsite catch basin to allow for the rate of future flows from the Caltrans lot to remain at existing levels.	D&CS	Construction	1
Please also refer to Mitigation Measures 3.4-3(a) through 3.4-3(g).			
3.7 Land Use and Planning			
Please refer to Mitigation Measure 3.1-1.			
3.8 Noise			
3.8-1(a) All construction equipment shall be equipped with improved noise muffling and have the manufacturer's recommended noise abatement measures, such as mufflers, engine covers, and engine vibration isolators in good working order.	D&CS	Construction	1
3.8-1(b) To the maximum extent feasible, hydraulic equipment (instead of pneumatic impact tools) and electric powered tools (instead of diesel powered equipment) shall be used for all exterior construction work.	D&CS	Construction	1
3.8-1(c) Maintaining equipment in an idling mode shall be minimized. All equipment shall be turned off if not in use.	D&CS	Construction	1

Responsible Units:

PO – UCIMC Planning Office
D&CS – UCI Design & Construction Services

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Table IV-1 (Continued)
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
3.8-1(d) A noise barrier 8 to 10 feet in height shall be provided at the project site perimeter, where construction would be adjacent to onsite or offsite sensitive receptors, that will break the line-of-sight between construction equipment and noise receptors, where feasible.	D&CS	Construction	1
3.8-1(e) Physical separation between noise generators and noise receptors shall be minimized to the extent feasible.	D&CS	Construction	1
3.8-2(a) Prior to the initiation of vibration-generating demolition and construction activities, the UCI Medical Center construction project manager shall notify building/department representatives that these activities are planned. This notification will allow for the relocation of vibration-sensitive equipment in portions of buildings that could be affected or scheduling modifications to avoid vibration disruptions.	D&CS	Construction	1
3.8-2(b) The UCI Medical Center construction staff shall work with the project contractor to schedule demolition and construction activities that use heavy equipment and are located within 50 feet of buildings where vibration-sensitive medical procedures occur, such that demolition and construction activities are not scheduled concurrent with sensitive medical operations. A system of communications would be established between selected vibration-sensitive uses/areas and the construction managers to avoid noise or vibration affecting patient care or research activities.	PO, D&CS	Construction	1
3.8-3(a) The UCI Medical Center shall prepare an acoustical study(ies) prepared by a qualified acoustical expert for any activities found to potentially exceed the City of Orange Noise Ordinance. The study(ies) shall be prepared by a qualified acoustical expert and describe the noise levels generated by the use and show any measured required for compliance with the Noise Ordinance standards.	PO, D&CS	Construction	1

Responsible Units:

PO – UCIMC Planning Office
 D&CS – UCI Design & Construction Services

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**Table IV-1 (Continued)
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM**

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
3.8-3(b) The UCI Medical Center shall prepare detailed plans for all parking structures. Said plans shall be accompanied by an acoustical study prepared by an acoustical expert. The acoustical study shall demonstrate that all feasible sound attenuation in compliance with the City of Orange Noise Ordinance has been incorporated into parking structure design, including but not limited to brushed driving surfaces (textured), limited openings oriented toward sensitive noise sources, etc.	D&CS	Design	1
3.8-4(a) As specific projects are developed and prior to the completion of final construction documents, the site plans shall be reviewed by a qualified acoustical expert to determine the noise reduction required by the buildings. Noise studies should be prepared for any building areas requiring more than 20 dB of outdoor-to-indoor noise attenuation. These assessments shall be prepared by a qualified acoustical expert and demonstrate the measures required to meet the applicable indoor standard.	D&CS	Design	1
3.8-4(b) Outdoor areas subject to the 65 CNEL noise standard shall be reviewed prior to the completion of final construction documents by a qualified acoustical expert to determine if the less than 65 CNEL standard will be achieved or can be met with sound barriers or other mitigation. Outdoor areas where noise barriers cannot provide enough reduction to achieve the 65 CNEL standard should be relocated, if feasible. Areas that will require sound barriers should have detailed noise studies prepared by a qualified acoustical expert to show the location and height of the noise barrier required to meet the 65 CNEL standard.	D&CS	Design	1

Responsible Units:

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**Table IV-1 (Continued)
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM**

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
3.10 Public Services and Utilities			
3.10-1(a) Prior to design approval, the UCI Medical Center shall have a water delivery system designed to provide adequate fire flows to the project site. Each site development project shall provide sufficient capacity for fire flows, as required by the City of Orange Fire Department.	D&CS	Design	1
3.10-1(b) Prior to design approval, the UCI Medical Center shall ensure that emergency pathways and accessways to buildings are of sufficient width to allow for the passage of emergency service vehicles. Spacing between buildings shall be sufficient to allow for the required turning radius of emergency response vehicles.	D&CS	Design	1
3.10-1(c) Prior to commencement of demolition and construction activities for each structure/facility, the UCI Medical Center or its designee shall file an emergency access plan with the City of Orange Fire Department. The plan shall identify alternative routes for emergency access during construction to areas blocked by project-related construction activities.	D&CS	Construction	1
3.10-1(d) Emergency vehicle access shall be provided to all required fire hydrants and be operational throughout construction.	D&CS	Construction	1
3.10-3(a) Security and design measures which employ defensible space concepts should be integrated into the project design and construction plans prior to design approval by the UCI Medical Center. These measures incorporate the concepts of Crime Prevention Through Environmental Design (CPTED), which involve the placement, and orientation of structures, access and visibility of common areas, placement of doors, windows, addressing and landscaping. CPTED promotes public safety, physical security and allows employees the ability to monitor activity.	D&CS	Design	1

Responsible Units:

PO – UCIMC Planning Office
D&CS – UCI Design & Construction Services

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**Table IV-1 (Continued)
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM**

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
3.10-3(b) Prior to commencement of demolition and construction activities for each structure/facility, the UCI Medical Center shall file an emergency access plan with the UCIMC Security Department and the City of Orange Police Department. The plan shall identify alternative routes for emergency access during construction to areas blocked by project-related construction activities.	D&CS	Construction	1
3.11 Traffic and Transportation			
3.11-1 During periods of high construction traffic (such as peak demolition and excavation), the UCI Medical Center shall coordinate construction truck traffic with daily traffic patterns in the project vicinity. Such coordination would seek to minimize short-term construction traffic conflicts to the extent feasible.	PO, D&CS	Construction	1
3.11-4 The UCI Medical Center shall implement a fee system or other mechanism to fund its fair share of costs for transportation improvements as identified in Table 3.11-16. The fair share payments will be linked to future (post-Phase I) traffic generating development projects within the LRDP and shall occur only after the City or Orange or other applicable jurisdiction has: (1) determined through reasonable traffic engineering analysis that the intersection or roadway link is operating at an unacceptable Level of Service; (2) established and implemented a mechanism for collecting funds from any other developers and entities contributing to traffic impacts; and (3) constructed the relevant intersection or roadway improvement.	PO	CEQA	1, 2

Responsible Units:

PO – UCIMC Planning Office
D&CS – UCI Design & Construction Services

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Compliance Action:

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**Table IV-1 (Continued)
UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER
LONG RANGE DEVELOPMENT PLAN
MITIGATION MONITORING PROGRAM**

Mitigation Measure	Responsible Unit	Mitigation Timing	Compliance Action
3.12 Utilities and Service Systems			
3.12-1(a) The UCI Medical Center shall be responsible for the provision of all onsite water system improvements necessary to serve the UCI Medical Center Phase I and Long Range Development Plan projects. Improvements shall be coordinated with the City of Orange to ensure that the project will have no net decrease in service to existing and future water customers	PO, D&CS	CEQA, Design	1
3.12-1(b) Prior to the approval of any LRDP development project beyond Phase 1, the UCI Medical Center shall prepare a project-specific water demand analysis and submit the analysis to the City of Orange Water Department for use in verifying adequate water supply for the project.	PO	CEQA	1
3.12-3(a) New construction should incorporate all practical and mandated water conservation measures. All developments should use ultra-low flow water fixtures to reduce the volume of wastewater generated.	D&CS	Design	1
3.12-9 Prior to the initiation of demolition and construction activities, the UCI Medical Center shall prepare a waste reduction plan. During the term of the demolition and construction, the UCI Medical Center shall establish a goal to recycle or divert 50 percent of construction and demolition wastes and keep records thereof in tonnage or in other measures deemed acceptable to the City of Orange. To the maximum extent feasible, onsite separation of scrap wood and clean green waste shall occur to permit chipping and mulching for soil enhancement or land cover purposes.	PO, D&CS	Design, Construction	1

Responsible Units:

PO – UCIMC Planning Office
D&CS – UCI Design & Construction Services

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Appendix A

SCH Acknowledgement of Receipt



Gray Davis
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse



ACKNOWLEDGEMENT OF RECEIPT

DATE: November 15, 2002
TO: Richard Demerjian
University of California, Irvine
750 University Tower
Irvine, CA 92697-2325
RE: University of California, Irvine Medical Center Long Range Development Plan
SCH#: 2000021111

This is to acknowledge that the State Clearinghouse has received your environmental document for state review. The review period assigned by the State Clearinghouse is:

Review Start Date: October 18, 2002
Review End Date: December 2, 2002

We have distributed your document to the following agencies and departments:

- California Highway Patrol
- Caltrans, District 12
- Department of Fish and Game, Region 5
- Department of Parks and Recreation
- Department of Toxic Substances Control
- Department of Water Resources
- Native American Heritage Commission
- Regional Water Quality Control Board, Region 8
- Resources Agency

The State Clearinghouse will provide a closing letter with any state agency comments to your attention on the date following the close of the review period.

Thank you for your participation in the State Clearinghouse review process.

Appendix B

Notice of Availability Affidavit of Publication

Appendix C

Mailing List for DEIR

UCIMC LRDP 2002

State Clearinghouse
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Sacramento, CA 95814

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Director
Campus Asset Mgmt
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Academic Senate
Attn: James Earthman
Planning & Budget
ZOT: 1325

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Plng. & Dev. Service
P.O. Box 4048
Santa Ana, CA 92702
Att: Mr. George Britton

Bill Parker
Vice Chancellor
Research & Graduate Studies
ZOT: 3175

Wendell Brase
Vice Chancellor
A&BS
ZOT: 1025

SCAQMD
Attn: Kathy Higgins
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Diamond Bar, CA 91765

UCI Main Library
Government Publications
ZOT: 8175

Ralph Cicerone
Chancellor
C/O Barbara Davidson
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Orange Co. Water District
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Science Library
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D&CS
ZOT: 2450

State Water Resources Control
Board
3737 Main St., Suite #500
Riverside, CA 92501-3339

Dept. of Transportation
Aeronautics Program MS40
P.O. box 942874
Sacramento, CA 994274-001

Mr. Jack Zimmermann
UCOP
1111 Franklin St., 6th FL
Oakland, CA 94607-5200

Airport Land Use Commission
3151 Airway Ave., K101
Costa Mesa, CA 92626

Orange County Clerk/Recorder
P.O. Box 238
Santa Ana, CA 92702-0238

State of California Air Resources
Board
9420 Telstar Ave
El Monte, CA 91731

Sanitation Districts of Orange
County
P.O. Box 8127
Fountain Valley, CA 92667

Orange County Fire Authority
180 So. Water Street
P.O. Box 86
Orange, Ca 92666-0086
Attn: Fuel Mod. Officer

Pat Roberts
COM - Research Program
Development
252 Irvine Hall
ZOT: 3950

Orange County Transportation
Authority
Attn: CEQA Review
550 S. Main Street
Orange, CA 92883

City of Villa Park
Att: Fred Maley, City Mgr.
17855 Santiago Blvd.
P.O. Box 3222
Anaheim, CA 92861

City of Anaheim
Attn: Joel Fick
Planning Dept.
P.O. Box 3222
Anaheim, CA 92803

Orange Co. Juvenile Courthouse
341 the City Drive
Orange, CA 92868

Oranewood Children's Home
401 The City Drive
Orange, CA 92868

Equity Office Properties
Attn: Thomas Clark
600 City Parkway West
Orange, CA 92868

Orange County Flood Control
District
Attn: Herb Nakasone
300N. Flower St. , 6th Fl.
Santa Ana, CA 92702-4048

Beam & Associates
Attn: Jim Beam
3745 W. Chapman Ave. #203
Orange, CA 92668

City of Orange Fire Dept.
Attn: Chief Vince Bonacker
176 South Grand
Orange, CA 92866

City of Orange Police Dept.
Attn: Andy Romero, Chief
1107 Batavia Street
Orange, CA 92867

City of Tustin
Community Development Dept.
Attn; Elizabeth Binsack
300 Centennial Way
Tustin, CA 92780

City of Santa Ana
Planning & Building Agency
Attn: Dan Bott
P.O. Box 9988-M20
Santa Ana, CA 92702

Theo Lacy Facility
Attn: Facilities Manager
501 the City Drive South
Orange, CA 92868

Santa Ana Watershed Project
Authority
11615 Sterling Aveue
Riverside, CA 92503

Pacific Bell
Attn: CEQA Review
140 New Montgomery St.
San Francisco, CA 94105

Dean Tom Cesario
UCI COM
252 Irvine Hall
ZOT: 3950

City of Orange
Community Dev. Dept
Attn: Alice Angus
300 E. Chapman Ave
Orange, CA 92866

Calif. Dept. of Transportation
District 12
3347 Michelson Drive, # 100
Irvine, CA 92612-0661

City of Garden Grove
Community Dev. Dept.
Attn: Matthew Fertal
11222 Acacia Parkway
Garden Grove, CA 92842

The Mills Corporation
1300 Wilson Blvd., #400
Arlington, VA 22209

Doubletree Hotel Orange
Attn: Jeff Protzman, Gen. Mgr.
100 The City Drive
Orange, CA 92868

So. Calif. Gas Company
P.O. Box 513249
Los Angeles, CA90051-1249
Mail Location 9392

Appendix D

Transcript of Public Hearing

CERTIFIED COPY

UCI MEDICAL CENTER

LONG RANGE DEVELOPMENT PLAN

ENVIRONMENTAL IMPACT REPORT

Public Hearing

October 20, 2002

6:00 p.m.

Reporter: Ewa Barnes, CSR 12522

spherion
deposition services

27281 Las Ramblas, Suite 160
Mission Viejo, CA 92691
Voice: 949-582-2503 / 800-640-1949
Fax: 949-582-8569
Email: deposoc@spherion.com

Spherion Deposition Services

Maxene Weinberg Agency
A Spherion Affiliate

1 Hearing called to order at 6:16 p.m.

2 My name is Lauren Becker, and I will be serving
3 as the hearing officer for tonight's public hearing on
4 the UCI Medical Center Long Range Development Plan
5 Environmental Impact Report.

6 I'm now opening the public hearing for the
7 UCI Medical Center Long Range Development Plan
8 Environmental Impact Report for public comment.

9 As there are no members of the public present,
10 this hearing is closed. It is now 6:18 p.m.

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