



# Irvine Campus Medical Complex

## Final Subsequent Environmental Impact Report

SCH NO. 2020029099

January 2021



Kimley»»Horn

# Irvine Campus Medical Complex

## Final Subsequent Environmental Impact Report

SCH 20200029099



Lead Agency:

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January 2021





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## 1.0 INTRODUCTION AND LIST OF COMMENTERS

### 1.1 Introduction

This Final Environmental Impact Report (Final EIR) contains agency, organization, and resident comments received during the public review period of the University of California, Irvine (UCI) Irvine Campus Medical Complex Project (proposed Project) Draft Subsequent Environmental Impact Report (SEIR). This document has been prepared by UCI, as Lead Agency, in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, Section 15132. The Introduction and List of Commenters chapter of the Final EIR discusses the background of the Draft SEIR and purpose of the Final SEIR, identifies the comment letters received on the Draft SEIR, and provides an overview of the Final SEIR's organization.

#### BACKGROUND

The Draft SEIR identified the proposed project's potential impacts and the mitigation measures that would be required to be implemented. The following environmental analysis chapters are contained in the proposed project Draft SEIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards/Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities/Service Systems
- Other Required CEQA Sections; and
- Alternatives to the Proposed Project.



In accordance with CEQA, a Notice of Availability (NOA) of the Draft SEIR was published on the UCI website, and the Draft SEIR was sent to the State Clearinghouse (SCH#:20200029099) for distribution to State agencies on October 2, 2020 for a 45-day public review period, ending on November 16, 2020. The Draft SEIR and the full administrative record for the Project, including all studies, were available for review on the UCI's website: <https://cpep.uci.edu/environmental/review.php>. Due to the COVID-19 pandemic, a paper copy of the Draft SEIR, would be made available by appointment. In addition, a public hearing was held on October 19, 2020 to solicit public comments regarding the Draft SEIR.

#### PURPOSE OF THE FINAL EIR

Under CEQA Guidelines, Section 15132, the Final SEIR shall consist of:

1. The Draft SEIR or a revision of the Draft.
2. Comments and recommendations received on the Draft SEIR.
3. A list of persons, organizations, and public agencies commenting on the Draft SEIR.
4. The responses to environmental points raised in the review process.
5. Any other information added by the Lead Agency.

As required by CEQA Guidelines, Section 15090(a)(1)-(3), a Lead Agency must make the following three determinations in certifying a Final SEIR:

1. The Final SEIR has been completed in compliance with CEQA.
2. The Final SEIR was presented to the decision-making body of the Lead Agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.
3. The Final SEIR reflects the Lead Agency's independent judgment and analysis.

Under CEQA Guidelines, Section 15091, a public agency shall not approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects. Findings of Fact must be accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record. The Findings of Fact are included in a separate document that will be considered for adoption by the University of California Regents.

In addition, pursuant to CEQA Guidelines, Section 15093(b), when a Lead Agency approves a project that would result in significant and unavoidable impacts, the agency must state in writing the reasons supporting the action (Statement of Overriding Considerations). The Statement of Overriding Considerations shall be supported by substantial evidence.

## LIST OF COMMENTERS

UCI received 86 comment letters during the public comment period on the Draft SEIR for the proposed project, plus comments during a public hearing. The comment letters were authored by the following agencies:

### State Agencies

1. California Department of Fish and Wildlife

### Local Agencies

2. City of Irvine
3. Orange County Transportation Authority
4. Transportation Corridor Agencies
5. Orange County Fire Authority
6. South Coast Air Quality Management District
7. Irvine Ranch Water District

### Organizations

8. Sea and Sage Audubon Society
9. California Cultural Resource Preservation Alliance (Martz)
10. California Cultural Resource Preservation Alliance (Valentin)

### Individuals

11. Julie Coffey
12. Tammy Le
13. Sidika Kilic
14. Jane Olinger
15. Mariam Abbas
16. Angeline Phu
17. Kristyn Guernica
18. Olivia Jenkins
19. Justin Fong
20. Jeanne Baran
21. Julissa Talamante
22. Mariam Al Moubasher
23. Gloria Huynh

24. Deida Lopez
25. Joe Valdez
26. Unknown Author
27. Peter Anthony Trejo
28. Kaylyn Hoy
29. Victoria Leonardi
30. Disney Williams
31. Cassandra Jade Gesmundo Asprec
32. Lia Celeste Rivera
33. Adrienne Jessica Santiago
34. Umaima Arif
35. Rabia Akhtar
36. Brooke Juarez
37. Camilo G Jr. Cia
38. Samantha Lemus
39. Skylar Hanson
40. Sahil Katrekar
41. Alexandra Huff
42. Araceli Mejia
43. Melanie Ortega
44. Blanca Aldana
45. Melina
46. Joanna Olvera
47. Jessica Diaz
48. Elizabeth Lopez
49. Lily Tran
50. Isalys De La Rosa
51. Miranda Xiao
52. Katherine Honganh Phan
53. Monserrath Resendiz
54. Jerry Du
55. Pamela Borden
56. Marc Adreil Olegario Villa Fuerte
57. Sydney Baraceros
58. Mikey Vibal
59. Luis Angel Fuentes
60. Leonang Angelica Diaz
61. Zithlaly Lara
62. Ames Luv
63. Madeline Clement

64. Kathryn Suzanne Rugh
65. Marissa Reina Fukunaga
66. Samantha Amandine Bellier
67. Bilen Michael
68. Angie Kwan-Ho Leung
69. Joshua Adam Block
70. Selin Gharapet
71. Thu Tuong Minh Nguyen
72. Audrey Leona Harjanto
73. Jason Tyler Jungreis
74. Fiona Fan
75. Arianna Romero
76. Alicia Suzanne Drevdahl
77. Katherine Elizabeth Thomas
78. Mona Amirseyedian
79. Kaitlyn Sapida
80. Jun Jang
81. Esmeralda Garcia-Castellanos
82. Jun Huang
83. Claire Alcanar
84. Bettina Eastman
85. Barabara Kipreos
86. Starlyn Howard
87. Sandrine Biziaux
88. Public Hearing Transcript

## ORGANIZATION OF THE FINAL SEIR

The Final SEIR is organized into the following chapters:

### **Chapter 1: Introduction and List of Commenters**

Chapter 1 of the Final SEIR provides an introduction and overview of the document, describing the background and organization of the Final SEIR. Chapter 1 also provides a list of commenters who submitted letters in response to the Draft SEIR.

### **Chapter 2: Responses to Comments**

Chapter 2 of the Final SEIR presents the comment letters received and responses to each comment. Each comment letter received has been numbered at the top and bracketed to



indicate how the letter has been divided into individual comments. Each comment is given a number with the letter number appearing first, followed by the comment number. For example, the first comment in Letter 1 would have the following format: 1-1. The response to each comment will reference the comment number.

### **Chapter 3: Revisions to the Draft SEIR Text**

Chapter 3 of the Final SEIR summarizes changes made to the Draft SEIR text in response to comment letters.

### **Chapter 4: Mitigation Monitoring and Reporting Program**

CEQA Guidelines, Section 15097, requires lead agencies to adopt a program for monitoring the mitigation measures required to avoid the significant environmental impacts of a project. The intent of the Mitigation Monitoring and Reporting Program (MMRP) is to ensure implementation of the mitigation measures identified within the Draft SEIR for the proposed project.

## 2.0. RESPONSES TO COMMENTS

This chapter contains responses to each of the comment letters submitted regarding the Irvine Campus Medical Complex Draft SEIR. Each bracketed comment letter is followed by numbered responses to each bracketed comment. The responses amplify or clarify information provided in the Draft SEIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the project that are unrelated to its environmental impacts) are either discussed or noted for the record, as appropriate. Where revisions to the Draft SEIR text are required in response to the comments, such revisions are noted in the response to the comment and are also listed in Chapter 3, Revisions to the Draft SEIR Text, of this Final SEIR. All new text is shown as double underlined and deleted text is shown as ~~struck through~~.

The changes to the analysis contained in the Draft SEIR represent only minor clarifications or amplifications and do not constitute significant new information or change any of the conclusions of the Draft SEIR. Therefore, in accordance with CEQA Guidelines, Section 15088.5, recirculation of the Draft SEIR is not required.

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## Letter 1: California Department of Fish and Wildlife

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State of California – Natural Resources Agency  
**DEPARTMENT OF FISH AND WILDLIFE**  
 South Coast Region  
 3883 Ruffin Rd.  
 San Diego, CA 92123  
 (858) 467-4201  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



November 16, 2020

Lindsey Hashimoto  
 University of California, Irvine  
 4199 Campus Drive, Suite 38  
 Irvine, CA 92697  
[hashimol@uci.edu](mailto:hashimol@uci.edu)

**Subject: UC Irvine Campus Medical Complex (PROJECT), Subsequent Environmental Impact Report (SEIR) SCH# 2020029099**

Dear Ms. Hashimoto:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a SEIR from UC Irvine for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

### CDFW's ROLE

1-1

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the state. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.



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## PROJECT DESCRIPTION SUMMARY

**Proponent:** University of California, Irvine (UCI)

**Objective:** The objective of the Project is to develop an integrated medical campus at UCI. Primary Project activities include demolition and site grading, installation of utilities, and construction of three new buildings and a parking structure.

**Location:** The Project site is located within the North Campus area of UCI in the City of Irvine, Orange County. The Project site is located within the Coastal Subregion of the Orange County Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP); however, it is not within the Reserve System or identified Special Linkage areas.

**Biological Setting:** The North Campus of UCI is separated from the Main Campus by San Diego Creek, the San Joaquin Marsh Reserve (managed by the UC), and University Drive. A general biological resources survey was conducted of the Project site, the laydown and parking areas that will be temporarily impacted, and a 150-foot buffer required by the 2007 UC Long Range Development Plan along the San Joaquin Marsh. Vegetation communities and land uses identified in the survey area include: 0.18 acre southern arroyo willow riparian forest, 1.04 acres coastal sage scrub (CSS), 0.15 acre restored CSS, 0.03 acre disturbed CSS, 1.18 acres ornamental vegetation, 11.63 acres disturbed, and 2.57 acres developed land. The SEIR indicates that temporary impacts to 0.23-acre of CSS in the laydown area are covered by the NCCP and no additional CSS mitigation will occur. No permanent impacts to special-status vegetation communities are anticipated.

1-1  
 Cont'd

Based on a literature reviewed for the SEIR, many-stemmed dudleya (*Dudleya multicaulis*; California Native Plant Society (CNPS) rarity ranking List 1B.2) has a moderate potential to occur on the Project site; no many-stemmed dudleya individuals were identified during the biological survey. Two special-status animal species were observed during the biological survey: Endangered Species Act (ESA)-listed and CDFW Species of Special Concern (SSC) coastal California gnatcatcher (*Polioptila californica*); and ESA-listed and California Endangered Species Act (CESA)-listed least Bell's vireo (*Vireo bellii pusillus*). Both species are covered under the Orange County NCCP/HCP with UCI as a participating landowner. Orange-throated whiptail (*Aspidoscelis hyperythrus*; SSC), western pond turtle (*Emys marmorata*; SSC), and western mastiff bat (*Eumops perotis californicus*; SSC) were identified as having a moderate potential to occur within the survey area. Western pond turtle and western mastiff bat are not covered species under the Orange County NCCP/HCP.

**Timeframe:** The Project is expected to span 30 months, beginning April 2021 and ending in October 2023.

## COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist UCI in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

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**I. Mitigation Measure or Alternative and Related Impact Shortcoming**

**COMMENT#1: Mitigation Measure BIO-2 (MM BIO-2)  
 Section ES, Page 3.3-18**

**Issue:** Mitigation for special status species is deferred in the SEIR.

**Specific impacts:** MM BIO-2 does not offer mitigation measures for potential impacts to special-status species not covered under the Orange County NCCP/HCP; specifically, western pond turtle and western mastiff bat. MM BIO-2 states that a focused wildlife clearance survey for special-status species including western pond turtle and western mastiff bat will be completed prior to construction and that, "[i]f special status species not already covered by the NCCP/HCP are found within the project site at the time of construction that cannot move on their own, a qualified biologist shall coordinate with CDFW and/or USFWS, as applicable, to determine measures to avoid and minimize impacts and, if impacts cannot be avoided and mitigation is required, it will be provided to ensure CEQA compliance (SEIR, page 3.3-19)."

**1-2 Why impact would occur:** The Project site is adjacent to the San Joaquin Marsh and contains southern arroyo willow riparian forest, which may provide basking or nesting habitat for western pond turtle. The nearest previously recorded occurrence of the species is 0.2 mile south of the survey area. The SEIR indicates that there is moderate potential for western pond turtle to bask and nest along the eastern edges of the survey area, although the species is not expected to occur in the area proposed for construction. The SEIR also identifies moderate potential for western mastiff bat to roost in tall buildings and trees present within the survey area. Direct impacts may occur if western pond turtle or western mastiff bat are found within the Project construction area. Indirect impacts to western pond turtle may be caused by construction-related noise, dust, or off-site sedimentation and indirect impacts to western mastiff bat may be caused from construction-related noise, light, or dust.

**Evidence impact would be significant:** The Guidelines for the Implementation of the California Environmental Quality Act (Cal. Code Regs., tit. 14, § 15000 *et seq.*) state that, "[w]here several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures shall not be deferred until some future time." (CEQA; §§ 15126.4, subdivision (a)(1)(B)).

Detection of these species is moderate, and mitigation measures must be specific and cannot be deferred under CEQA. "CEQA compliance" as referenced cannot be determined within the context of deferred mitigation.

**Recommended Potentially Feasible Mitigation Measure(s) (Regarding Mitigation Measure or Alternative and Related Impact Shortcoming)**

**1-3 Mitigation Measure #1:** In addition to coordination with CDFW and the United States Fish and Wildlife Service (USFWS), we recommend that MM BIO-2 be amended to include species-specific mitigation measures, should western pond turtle or western mastiff bat be identified during focused species surveys.

**To minimize significant impacts:** Prior to clearing, mowing, or ground-breaking activities, a qualified biologist shall conduct a focused wildlife clearance survey for special-status wildlife species with the potential to occur within the Project site, which includes least Bell's vireo, coastal California gnatcatcher, orange-throated whiptail, western mastiff bat, and western pond turtle.

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1-3  
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Focused surveys shall be inclusive of the entire survey area. Areas immediately adjacent to the San Joaquin Marsh Reserve at the southern area of the Project site have a higher potential to support least Bell's vireo and western pond turtle, areas immediately adjacent to CSS have a higher potential to support coastal California gnatcatcher, and the majority of the Project site provides potential habitat for orange-throated whiptail. In addition, all trees and buildings within and near the Project site should be surveyed for roosting bats such as western mastiff bat.

- a. If western pond turtle is detected in focused surveys, CDFW shall be consulted. The qualified biologist shall submit a Pond Turtle Avoidance and Minimization Plan (Plan) to CDFW prior to ground disturbances. The Plan shall include complete avoidance and minimization measures (e.g., project timing, restrictions on grading date and location, exclusionary fencing and zones, trapping); and identification of suitable existing sites for relocation of pond turtles. The Plan shall be approved by CDFW, in writing, prior to ground disturbance.
- b. If western mastiff bat is detected in focused surveys, CDFW shall be consulted. To avoid direct mortality of western mastiff bats, any structure with potential bat habitat shall have temporary and humane bat exclusion devices installed under the supervision of the qualified biologist prior to the initiation of construction activities. Exclusion devices shall be installed between October 1 and November 30, within the 12-month period prior to construction to avoid trapping flightless young inside during the summer months or hibernating individuals during the winter. Exclusion shall be implemented selectively, and only to the extent necessary, to prevent morbidity or mortality to the bats. Exclusionary devices shall be removed at the end of construction or as otherwise authorized by CDFW.
- c. If additional special-status species not already covered by the NCCP/HCP, that were not analyzed in the SEIR, are found within the project site at the time of construction, a qualified biologist shall coordinate with CDFW and/or USFWS, as applicable, to determine measures to avoid and minimize impacts.

1-4

**Mitigation Measure #2:** CDFW currently implements its authority to issue permits for the take or possession of wildlife, including mammals, birds, and the nests and eggs thereof, reptiles, and amphibians, fish, certain plants, and invertebrates for scientific, educational, and propagation purposes through Section 650, Title 14, California Code of Regulations, by issuing Scientific Collecting Permits.

**To minimize significant impacts:** If additional species not covered by the NCCP are identified, on-site biologists shall be required to obtain, as applicable, Scientific Collecting Permits (SCP). A Species Relocation Plan may be appropriate to establish protocol for relocation of wildlife, including guidelines for the SCP-holding biologist to capture unharmed and release found species in appropriate habitat an adequate distance from the project site, unless they are a CESA- and/or ESA- listed species in which case coordination and direction from CDFW and/or the USFWS, respectively, shall be required.

1-5

**Mitigation Measure or Alternative and Related Impact Shortcoming**

**COMMENT #2: Mitigation Measure BIO-4 (MM BIO-4)**  
 Section ES, Page 3.3-21

**Issue:** Mitigation Measure BIO-4 (MM BIO-4) may not reduce potential impacts to nesting birds to less than significant due to no established timeframe for preconstruction surveys.

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1-5  
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**Specific impact:** MM BIO-4 describes pre-construction surveys for nesting birds, should clearing and/or construction activities occur during avian nesting season from January through August, and indicates that a suitable buffer based on the specific species will be established per biologist recommendations. For MM BIO-4 to be effective in reducing nesting bird impacts to less than significant, a specific timeframe should be established for occurrence of preconstruction nesting bird surveys. Surveys should be conducted as close to the time of potential disruption as possible, no more than 3 days prior to the start of construction.

**Why impact would occur:** Trees on the Project site as well as in the adjacent San Joaquin Marsh provide suitable nesting habitat for a variety of bird species. Construction activities including grading and vegetation removal may impact nesting birds.

**Evidence impact would be significant:** Per California Fish and Game Code Sections 3503, 3503.5, and 3513 the Proposed Project is required to avoid the incidental loss of fertile eggs or nestlings or activities that lead to nest abandonment.

**Recommended Potentially Feasible Mitigation Measure(s) (Regarding Mitigation Measure or Alternative and Related Impact Shortcoming)**

**Mitigation Measure #3:** CDFW recommends that nesting bird surveys be conducted a maximum of 3 days prior to construction-related activities. To avoid or minimize impacts to nesting birds, CDFW recommends that MM BIO-4 be amended to read as follows (additions noted in **bold**):

1-6

**To minimize significant impacts:** Project construction activities involving ground disturbance or vegetation removal shall avoid the bird breeding season (typically January through July for raptors and February through August for other avian species), if feasible. If breeding season avoidance is not feasible, a qualified biologist shall conduct a pre-construction nesting bird survey **no more than three days** prior to the commencement of any ground disturbing activities to determine the presence/absence, location, and status of any active nests on or adjacent to the survey area. The extent of the survey buffer area surrounding the site shall be established by the qualified biologist to ensure that direct and indirect effects to nesting birds are avoided.

In the event that active nests are discovered, a suitable buffer (distance to be determined by the biologist based on the specific species found to be nesting, but typical nest buffers are from 500 feet to 300 feet but can be smaller depending on the bird species) shall be established around such active nests, and no construction within the buffer shall be allowed, until the biologist has determined that the nest(s) is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest) or that it is safe to resume certain construction activities. Avoidance buffers may be reduced in size if a qualified biological monitor is present to observe the birds. The biological monitor must use best professional judgment to ensure that construction activities do not cause "take" (e.g., adults flushing off of a nest, fledglings changing behavior that could put them in harm, or any other form of disturbance).

**ENVIRONMENTAL DATA**

1-7

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link:

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1-7  
 Cont'd { [http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB\\_FieldSurveyForm.pdf](http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf). The completed form can be mailed electronically to CNDDDB at the following email address: [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov). The types of information reported to CNDDDB can be found at the following link: [http://www.dfg.ca.gov/biogeodata/cnddb/plants\\_and\\_animals.asp](http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp).

#### FILING FEES

1-8 { The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

#### CONCLUSION

CDFW appreciates the opportunity to comment on the SEIR to assist UCI in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Jessie Lane, Environmental Scientist at [Jessie.Lane@wildlife.ca.gov](mailto:Jessie.Lane@wildlife.ca.gov).

Sincerely,

DocuSigned by:

*Erinn Wilson-Olgin*

B8E58CFE24724F5...

Erinn Wilson-Olgin  
 Environmental Program Manager I  
 South Coast Region

Ec: CDFW

David Mayer, San Diego – [David.Mayer@wildlife.ca.gov](mailto:David.Mayer@wildlife.ca.gov)  
 Karen Drewe, San Diego – [Karen.Drewe@wildlife.ca.gov](mailto:Karen.Drewe@wildlife.ca.gov)

William Miller, USFWS – [William\\_B\\_Miller@fws.gov](mailto:William_B_Miller@fws.gov)  
 State Clearinghouse, Sacramento – [State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

#### ATTACHMENTS

A. CDFW Comments and Recommendations

#### REFERENCES

Public Resources Code Sections 21000-21177 and State CEQA Guidelines 14  
 California Code of Regulations 15000-15387

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**Attachment A:**

**CDFW Draft Mitigation, Monitoring, and Reporting Plan and Associated Recommendations**

Biological Resources			
	Mitigation Measures	Timing	Responsible Party
MM BIO-1	<p>Prior to clearing, mowing, or ground-breaking activities, a qualified biologist shall conduct a focused wildlife clearance survey for special-status wildlife species with the potential to occur within the Project site, which includes least Bell’s vireo, coastal California gnatcatcher, orange-throated whiptail, western mastiff bat, and western pond turtle. Focused surveys shall be inclusive of the entire survey area. Areas immediately adjacent to the San Joaquin Marsh Reserve at the southern area of the Project site have a higher potential to support least Bell’s vireo and western pond turtle, areas immediately adjacent to CSS have a higher potential to support coastal California gnatcatcher, and the majority of the Project site provides potential habitat for orange-throated whiptail. In addition, all trees and buildings within and near the Project site should be surveyed for roosting bats such as western mastiff bat.</p> <p>a. If western pond turtle is detected in focused surveys, CDFW shall be consulted. The qualified biologist shall submit a Pond Turtle Avoidance and Minimization Plan (Plan) to CDFW prior to ground disturbances. The Plan shall include complete avoidance and minimization measures (e.g. project timing, restrictions on grading date and location, exclusionary fencing and zones, trapping); and, identification of suitable existing sites for relocation of pond turtles. The Plan shall be approved by CDFW, in writing, prior to ground disturbance.</p> <p>b. If western mastiff bat is detected in focused surveys, CDFW shall be consulted. To avoid direct mortality of western mastiff bats, any structure with potential bat habitat shall have temporary and humane bat</p>	Before Construction	UCI

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	<p>exclusion devices installed under the supervision of the qualified biologist prior to the initiation of construction activities. Exclusion devices shall be installed between October 1 and November 30, within the 12-month period prior to construction to avoid trapping flightless young inside during the summer months or hibernating individuals during the winter. Exclusion shall be implemented selectively, and only to the extent necessary, to prevent morbidity or mortality to the bats. Exclusionary devices shall be removed at the end of construction or as otherwise authorized by CDFW.</p> <p>c. If additional special-status species not already covered by the NCCP/HCP, that were not analyzed in the SEIR, are found within the project site at the time of construction, a qualified biologist shall coordinate with CDFW and/or USFWS, as applicable, to determine measures to avoid and minimize impacts.</p>		
MM BIO-2	<p>If additional species not covered by the NCCP are identified, on-site biologists shall be required to obtain, as applicable, Scientific Collecting Permits (SCP). A Species Relocation Plan may be appropriate to establish protocol for relocation of wildlife, including guidelines for the SCP-holding biologist to capture unharmed and release found species in appropriate habitat an adequate distance from the project site, unless they are a CESA and/or ESA -listed species in which case coordination and direction from CDFW and/or the United States Fish and Wildlife Service, respectively, shall be required.</p>	Before Construction	UCI
MM BIO-3	<p>Project construction activities involving ground disturbance or vegetation removal shall avoid the bird breeding season (typically January through July for raptors and February through August for other avian species), if feasible. If breeding season avoidance is not feasible, a qualified biologist shall conduct a pre-construction nesting bird survey <b>no more than three days</b> prior to the commencement of any ground disturbing activities to determine the presence/absence, location, and status of any active nests on or adjacent to the</p>	Before Construction	UCI



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	<p>survey area. The extent of the survey buffer area surrounding the site shall be established by the qualified biologist to ensure that direct and indirect effects to nesting birds are avoided.</p> <p>In the event that active nests are discovered, a suitable buffer (distance to be determined by the biologist based on the specific species found to be nesting, but typical nest buffers are from 500 feet to 300 feet but can be smaller depending on the bird species) shall be established around such active nests, and no construction within the buffer shall be allowed, until the biologist has determined that the nest(s) is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest) or that it is safe to resume certain construction activities. Avoidance buffers may be reduced in size if a qualified biological monitor is present to observe the birds. The biological monitor must use best professional judgment to ensure that construction activities do not cause "take" (e.g., adults flushing off of a nest, fledglings changing behavior that could put them in harm, or any other form of disturbance).</p>		
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**Letter 1: California Department of Fish and Wildlife**

1-1: This comment summarizes the contents of the role and responsibilities of the California Department of Fish and Wildlife (CDFW) as a Trustee Agency, and summarizes the project objectives, location, and existing biological resources. These comments on the Draft SEIR are not at variance with the findings of the document and provide a preface to subsequent comments discussed below. This comment does not request additional information or clarification related to the Draft SEIR.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

1-2: As noted in the comment the mitigation measure prescribes a focused wildlife clearance survey for special-status wildlife species conducted by a qualified biologist and subsequent coordination with CDFW and/or USFWS would occur. The subsequent communication with these agencies would ensure compliance with the applicable provisions and standards related to protection of these and any other listed species that may be found as part of the plan described in the mitigation measure. Compliance with applicable provisions and standards has been held to be enforceable and valid mitigation. (*Oakland Heritage Alliance v City of Oakland* (2011) 195 Cal.App.4th 884, 906.) Per the request of CDFW in this comment, the mitigation measure has been revised in the Final SEIR to be consistent with the suggested language provided by CDFW in order to provide clarification as to the mitigation planning process.

In addition, CDFW provided further suggestions related to the mitigation as shown in Comments 1-3 through 1-4, below. The comments recommend additional amendments to the existing mitigation measures. In order to consolidate the revisions, all recommendations from Comments 1-2 through 1-4, have been included to MM-BIO-2. The amended Mitigation Measure BIO-2 now reads as follows:

**MM-BIO-2** - Prior to clearing, mowing, or ground-breaking activities, a qualified biologist shall conduct a focused wildlife clearance survey for special-status wildlife species with the potential to occur within the Project site, which includes least Bell's vireo, coastal California gnatcatcher, White tailed Kite, orange-throated whiptail, western mastiff bat, and western pond turtle. Focused surveys shall be inclusive of the entire survey area. Areas immediately adjacent to the San Joaquin Marsh Reserve at the southern area of the Project site have a higher potential to support least Bell's vireo and western pond turtle, areas immediately adjacent to CSS have a higher potential to support coastal California gnatcatcher, and the majority of the Project site provides potential habitat for orange-throated whiptail, White tailed Kite. Exclusionary fencing for western pond turtle shall be erected along the edge of the limits of construction prior to any ground disturbing activities. In addition, all trees and buildings within and near the Project site should be surveyed for roosting bats such as western mastiff bat.

- If western pond turtle is detected in focused surveys, California Department of Fish and Wildlife (CDFW) shall be consulted. The qualified biologist shall submit a Pond Turtle Avoidance and Minimization Plan (Plan) to CDFW prior to ground disturbances. The Plan shall include complete avoidance and minimization

measures (e.g., project timing, restrictions on grading date and location, exclusionary fencing and zones, trapping); and identification of suitable existing sites for relocation of pond turtles. The Plan shall be approved by CDFW, in writing, prior to ground disturbance.

- If western mastiff bat is detected in focused surveys, CDFW shall be consulted. To avoid direct mortality of western mastiff bats, any structure with potential bat habitat shall have temporary and humane bat exclusion devices installed under the supervision of the qualified biologist prior to the initiation of construction activities. Exclusion devices shall be installed between October 1 and November 30, within the 12-month period prior to construction to avoid trapping flightless young inside during the summer months or hibernating individuals during the winter. Exclusion shall be implemented selectively, and only to the extent necessary, to prevent morbidity or mortality to the bats. Exclusionary devices shall be removed at the end of construction or as otherwise authorized by CDFW.
- If special-status species not covered by the NCCP/HCP, are identified during clearance surveys prior to construction, a qualified biologist shall coordinate with CDFW and/or U.S. Fish and Wildlife Service (USFWS), as applicable, to determine measures to avoid and minimize impacts.

~~If special-status species not already covered by the NCCP/HCP are identified, on-site biologists shall be required to obtain, as applicable, Scientific Collecting Permits (SCP). A Species Relocation Plan may be appropriate to establish protocol for relocation of wildlife, including guidelines for the SCP-holding biologist to capture unharmed and release found species in appropriate habitat an adequate distance from the project site, unless they are a CESA and/or ESA -listed species in which case coordination and direction from CDFW and/or the United States Fish and Wildlife Service, respectively, shall be required. found within the project site at the time of construction that cannot move on their own, a qualified biologist shall coordinate with CDFW and/or USFWS, as applicable, to determine measures to avoid and minimize impacts and, if impacts cannot be avoided and mitigation is required, it will be provided to ensure CEQA compliance. However, based on the analysis conducted for this project, special-status species that are not covered by the Orange County NCCP/HCP are not expected to occur within the areas proposed for construction.~~

The changes to this mitigation measure are in response to the CDFW comment and have been included to the Final SEIR. These changes do not constitute substantial new evidence but have been included for clarifications purposes per the request of the Trustee Agency.

- 1-3:** The comment recommends amendments to the existing mitigation measure MM-BIO-2. Revisions to the mitigation have been made in the Final SEIR in accordance with CDFW recommendation. The commenter is referred to Response 1-2, above.

- 1-4:** This comment recommends amendments to the existing mitigation measure MM-BIO-2. Revisions to the mitigation have been made in accordance with CDFW recommendation. Please see Response 1- 2, above.
- 1-5:** This comment recommends amendments to the existing mitigation measure MM-BIO-4. Revisions to the mitigation have been made in accordance with CDFW recommendation.
- 1-6:** The CDFW letter recommends amendments to the existing mitigation measure MM-BIO-3. Revisions to the mitigation have been made in accordance with CDFW recommendation. Please see Response 1-2, above.
- 1-7:** Per the request of CDFW and CEQA requirements, information related to biological resources (special status species and natural communities) will be reported as required during future surveys to the California Natural Diversity Database (CNDDDB) at the links provided by CDFW in their comment.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

- 1-8:** UCI is aware of the required assessment and filing fees upon filing of the Notice of Determination (NOD) by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Accordingly, UCI will pay the fee in accordance with (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

## Letter 2: City of Irvine



Community Development

[cityofirvine.org](http://cityofirvine.org)

City of Irvine, One Civic Center Plaza, P.O. Box 19575, Irvine, California 92623-9575 949-724-6000

November 10, 2020

Sent via USPS and  
email: [hashimol@uci.edu](mailto:hashimol@uci.edu)

Ms. Lindsey Hashimoto  
Campus Physical and Environmental Planning  
University of California, Irvine  
4199 Campus Drive, Suite 380  
Irvine, CA 92697-2325

**Subject: Comment Letter for NOA for Draft Subsequent EIR for the UCI Irvine Campus Medical Complex and proposed LRDP Amendment 3 to add inpatient clinical/hospital uses (SCH No. 2020029099)**

Dear Ms. Hashimoto:

City of Irvine staff reviewed the Draft Subsequent EIR (SEIR) for the proposed Irvine Campus Medical Complex (ICMC) project located on an approximately 14.5-acre site within UCI's 144-acre North Campus in Planning Area 29. The project site is near the southeast corner of Jamboree Road and Birch Street and is adjacent to and directly east of the UC Regents funded but yet to be constructed approximately 168,500 square foot medical office building called the UCI Health Center for Advanced Care, which includes the Center for Children's Health.

2-1

The 2007 Long Range Development Plan (LRDP) is a comprehensive land use plan for UCI's main campus sites. The 2007 LRDP is based on projected development levels and patterns through the year 2026 and guides future campus growth. The ICMC project, which proposes to add inpatient uses (i.e., hospital) as an allowable use under the Mixed Use-Commercial land use category, requires a requested Amendment (#3) to the 2007 LRDP.

The proposed project is an integrated medical campus providing inpatient, ambulatory, and emergency care services space for the region and includes the following:

- 350,000-square-foot, six-story with basement level acute care hospital with 96- to 144-beds, an emergency department, and diagnostic/treatment space;
- 225,000-square-foot, six-story with basement level ambulatory care center (ACC) with outpatient clinics, chemotherapy and non-oncology infusion center, and retail pharmacy;
- 37,000-square-foot, three-story central utility plant (CUP) to provide thermal energy service (chilling and heating) and back-up power generation;

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2-1  
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- 1,400 space free-standing parking structure with two-levels below-grade and six-levels above-grade, additional surface parking and drop-off areas for visitor, short-term, and service;
- Open space improvements including outdoor public spaces/gardens, pedestrian and bicycle path improvements, recreational trail, and ornamental landscaping; and

Vehicular access would occur from two locations on Jamboree Road as follows: (1) primary visitor entry at the existing signalized intersection of Jamboree Road at Birch Street; and (2) primary staff, service, deliveries, and emergency vehicle entry is a right-in/right-out access on Jamboree Road approximately 700 feet south of Birch Street (a.k.a., West Access Road to be constructed as a part of the UCI Center for Child Health/Medical Office Building project).

As indicated on Page 2-24 of the DSEIR, if the project design and LRDP Amendment #3 is approved as well as SEIR certified by the UC Board of Regents, the proposed project would be phased over an approximately 30-month period with demolition and grading activities anticipated to commence in April 2021 and construction anticipated to complete in October 2023.

**Based on the review of the Draft SEIR, staff would like to provide the following comments:**

2-2

1. City staff is concerned why the proposed Child Health/Medical Office project was not analyzed together with ICMC. Why are these adjacent projects being piecemealed especially when the proposed projects share access points off heavily traveled Jamboree Road?

2-3

2. Throughout the DSEIR, revise the square footage of the CCH medical office building from 168,000 SF to 168,500 SF to be consistent with the NOD filed for the adopted IS/MND (SCH No. 2020019078) with OPR on March 19, 2020. Or clarify the square footage inconsistency.

2-4

3. Page ES-3 indicates that “The 2007 LRDP provides the comprehensive framework for the physical development of the UCI campus and is the primary planning document for the campus; no other local land use plans apply to the University. The LRDP contemplated that North Campus redevelopment, to accommodate future LRDP development, would require demolition of existing North Campus facilities and relocation of those uses to other areas of the campus as identified in the LRDP.”

Furthermore, page 3.10-1 indicates that “no other land use plan, general plan, specific plan, local coastal program, or zoning ordinance applies to the campus.”

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2-4  
Cont'd

The Discretionary Actions and Approvals section on Page ES-4 indicates FEMA and the City of Irvine as responsible agencies where the project will require approval to construct in the FEMA floodplain (i.e., Conditional Letter of Map Revision or "CLOMR").

However, the addition of the proposed inpatient hospital use requires an amendment to the 2007 LRDP as hospital use was not originally contemplated as part of the approved LRDP. As previously indicated in Irvine's NOP comments, a hospital use (as defined by the Irvine Zoning Code below) requires a Conditional Use Permit (CUP) in the 6.1 Institutional zone in accordance with Zoning Ordinance Section 3-37-37.

- *Hospital*: An institution providing primary health services and medical or surgical care to people, primarily inpatients, suffering from illness, disease, injury, deformity and other abnormal physical or mental conditions, and including, as an integral part of the institution, related facilities such as laboratories, outpatient facilities or training facilities.

Based on the available information, City staff does not believe hospital use furthers the University's mission, and requires a conditional use permit.

2-5

4. Page ES-3: Grading approximately 3.5-acres of the existing UCI Arboretum area for a temporary construction staging and equipment laydown area (and "minor" grading for the temporary unpaved surface lot to be located in the existing UCI Support Service Facilities area) will be subject to City of Irvine grading permit application and WQMP. In general, all project components unrelated to the acute care hospital are subject to City of Irvine ministerial approvals. It is highly recommended that UCI coordinates all demolition, grading, and construction activities through the following City staff:

- Kam Chitalia, Chief Building Official at 949-724-6371 or [kchitalia@cityofirvine.org](mailto:kchitalia@cityofirvine.org)
- Claudia Landeras-Sobaih, Principal Plan Check Engineer at 949-724-6330 or [clanderas-sobaih@cityofirvine.org](mailto:clanderas-sobaih@cityofirvine.org)
- Michael Yang, Water Quality Engineer (water quality management plan per Page 3.9-11) at 949-724-6327 or [myang@cityofirvine.org](mailto:myang@cityofirvine.org)
- Tom Polson, Senior Plan Check Engineer (grading) at 949-724-6367 or [tpolson@cityofirvine.org](mailto:tpolson@cityofirvine.org)
- Bruce Ramm, Security Design Concepts (City's security and lighting consultant) at 949-714-997-1084 or [ramm.sdc@ix.netcom.com](mailto:ramm.sdc@ix.netcom.com)
- Michael Byrne, Senior Management Analyst (waste management plan) at 949-724-6357 or [mbyrne@cityofirvine.org](mailto:mbyrne@cityofirvine.org)
- Justin Equina, Associate Planner (addressing and street naming), at 949-724-6364 or [jequina@cityofirvine.org](mailto:jequina@cityofirvine.org)

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- 2-6 { 5. Page ES-3 and Page 2-8: Provide a corresponding “zoning” map with all land use designations including the “Mixed Use-Commercial” and “Open Space” zones overlaid on the conceptual site plan and entire North Campus planning sector aerial.
- 2-7 { 6. ES-33, Impact 3.8-5, Emergency Response and Evacuation Plans: Given the proximity to the Irvine Business Complex, a major jobs and housing center in Irvine, lane or roadway closures related to emergency response and evacuation plans shall be coordinated with Bobby Simmons, Emergency Management Administrator, 949-724-7235 or [RSimmons@cityofirvine.org](mailto:RSimmons@cityofirvine.org) in the City’s Public Safety Department.
- 2-8 { 7. ES-33, Impact 3.8-5. Emergency Response and Evacuation Plans: On the other hand, lane or roadway closures related to construction activities shall be coordinated through Stan Ng, Associate Engineer with the City of Irvine, typically using CA MUTCD guidelines and WATCH Manual for traffic control design and staging. Stan may be reached at [shng@cityofirvine.org](mailto:shng@cityofirvine.org) or 949-724-7355.
- 2-9 { 8. ES-39, Impact 3.10-2, Applicable Land Use Plans, Policies and Regulations states “Project implementation would require an LRDP Land Use Amendment and would be consistent with UCI LRDP applicable goals and policies. The Project would also be consistent with the AELUP for JWA, the City of General Plan, and Orange County NCCP” and concludes that “no mitigation is required.”  
  
 The project site is designated as Mixed Use-Commercial in the 2007 LRDP. Staff confirmed that Table 5-1, 2007 LRDP Land Use Matrix (as amended by Amendment #1), specifies primary uses for “Mixed-use Commercial” as “Facilities for office, research, and development, and academic activities, commercial and retail space, conference facilities, residential facilities, clinical uses (uses may be non-University oriented if located in the Inclusion Areas).”  
  
 As part of the project and CEQA review process, provide a revised LRDP (i.e., strike-out and highlight version) with proposed land use amendment #3 to add inpatient/hospital uses to the Mixed Use-Commercial category as well as justifications/findings demonstrating all applicable goals and policies from the 2007 LRDP will continue to be met. The proposed LRDP amendments and justifications should be available for public review and comment concurrent with the DSEIR. The project information as currently presented is incomplete as the short paragraph on page 3.10-8 and Table 3.10-1 in Section 3.10, Land Use Planning does not adequately address the Amendment #3 request.
- 2-10 ↓ 9. ES-39, Impact 3.10-2, Applicable Land Use Plans, Policies and Regulations: The project is inconsistent with Irvine’s current General Plan as detailed below.  
  
 Per Irvine’s General Plan and Zoning Ordinance, the property is zoned as 6.1 Institutional in Planning Area 29. As previously indicated in the City’s NOP comment

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**2-10**  
Cont'd

letter dated March 18, 2020, there is currently 761,000 SF of educational facilities development intensity and 435 DU allocated to Planning Area 29.

Based on discussions between UCI and City planning staff in late 2019, the square footage intensity for PA 29 in the City's General Plan (Table A-1) and Zoning Ordinance (Chapter 9-29) will be revised as part of the on-going General Plan Update (GPU) effort as summarized below. However, the GPU is not anticipated to be completed until October 2024.

- 950,000 SF (consistent with the 2007 LRDP)
- 435 DU (consistent with the 2007 LRDP)
- 140,000 additive SF for the existing FDA Lab building at 19701 Fairchild

As listed below, the total square footage of 855,855 SF (i.e., 780,500 SF proposed + approximately 75,355 SF existing) exceeds the current General Plan and Zoning Ordinance maximum allocations.

- 350,000 SF acute care hospital
- 225,000 SF ambulatory care center
- 37,000 SF central plant
- 168,500 SF medical office building/CCH (SF based on NOD filed with OPR on March 19, 2020, which differs from the 168,000 SF in the reviewed draft IS/MND)
- 75,355 SF +/- of existing North Campus Land Uses per Table 2-1 on pages 2-6 and 2-7 of the DSEIR (i.e., 117,132 SF total minus the closed child development center, receiving yard, and recycling center that will be demolished to accommodate the CCH and 11,838 SF demolished for ICMC per Table 2-3).

**2-11**

10. Page ES-39, Impact 3.11-1: Table F-1 in the Noise Element of the General Plan details noise standards within Irvine. For a hospital use, the interior standard is 45 CNEL and the exterior standard is 65 CNEL, which is stricter than the state noise standards outlined in Impact 3.11-1. Additionally, Chapter 2, Noise, of the City's Municipal Code designates hospitals and residential properties as "noise zone 1" subject to the strictest City noise standards.

Given the project site is surrounding by the Irvine Business Complex, which includes nearby existing residential developments such as The Plaza and Watermarke, please ensure the project will mitigate to meet the stricter City noise standards. During the October 19, 2020 public hearing for oral comments, a Watermarke resident, expressed concerns regarding noise and traffic impacts especially during construction and requesting a larger study area inclusive of Carlson and Campus (in addition to Jamboree Blvd.).



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2-12 11. Irvine Municipal Code Section 6-8-205 states “Construction activities and agricultural operations may occur between 7:00 a.m. and 7:00 p.m. Mondays through Fridays, and 9:00 a.m. and 6:00 p.m. on Saturdays. No construction activities shall be permitted outside of these hours or on Sundays and federal holidays, except Columbus Day, unless a temporary waiver is granted by the Chief Building Official or his or her authorized representative. Trucks, vehicles, and equipment that are making or are involved with material deliveries, loading, or transfer of materials, equipment service, maintenance of any devices or appurtenances for or within any construction project in the City shall not be operated or driven on City streets outside of these hours or on Sundays and federal holidays unless a temporary waiver is granted by the City. Any waiver granted shall take impact upon the community into consideration. No construction activity and agricultural operations will be permitted outside of these hours except in emergencies including maintenance work on the City rights-of-way that might be required.”

Any deviations from these requirements are subject to City of Irvine temporary waiver approval by the Chief Building Official (in addition to any required UCI approvals as stated in Mitigation Measure NOI-2).

2-13 12. Impact 3.13-1a, Fire Protection indicates “Discussions regarding siting of a new fire station have occurred with OCFA, which potential impacts would be analyzed in a project-specific CEQA document. Development of the Project is consistent with the UCI’s campus strategic planning and would not increase demand for fire protection services than analyzed in the LRDP EIR.”

The City strongly supports the development of a new fire station. Please keep City staff apprised of the status on defining a site.

2-14 13. Impact 3.13-1b, Police Protection: Clarify if police protection services would be provided by UCI campus police and/or City of Irvine police.

2-15 14. Figure 2-4, Project Site: Will the 150-foot wide wetlands buffer zone be sufficient? Approximately 82 percent of the 2007 LRDP allocated SF development intensity for Planning Area 29 is proposed to be used by the CCH and ICMC projects on 20-acres (along with another 8 percent of the SF allocation for miscellaneous existing uses) out of 144-acre total for the North Campus. Page 3.10-7 indicates “the 2007 LRDP North Campus Development program allows for 950,000 gsf of development and 435 residential uses on approximately 46 acres of the 144-acre North Campus sector.”

Page 2-1 indicates, “In June 2018 a minor amendment to the LRDP, Amendment #1, was approved to add Clinical uses as a Primary Use to the North Campus’ Mixed Use-Commercial land use designation.” These intense and concentrated medical

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- 2-15** Cont'd { office and proposed hospital land uses were not originally contemplated with the original 2007 LRDP and its EIR. A medical office use typically keeps regular office hours whereas a hospital with emergency department is 24 hours-7 days per week.
- 2-16** { 15. Page 2-7, UCI Arboretum, and Page 2-14: Will grading and using a 3.5-acre portion of the 12.5-acre arboretum as a “temporary construction staging and equipment laydown area permanently harm and/or displace the flora and fauna (beyond just relocating vegetation to the botanical garden on the Main Campus)? Address the relocation of the impacted portion of the arboretum to the UCI Main Campus as part of this project and EIR as it is a direct physical change in the environment which is caused by and immediately related to the project. Additionally, the UCI Arboretum is currently closed due to COVID-19 until further notice and it appears the Arboretum is potentially relocating to UCI’s Main Campus.
- 2-17** { 16. Figure 2-5, Existing LRDP Land Use Designation: Verify the colors on the legend match the colors on the map. For instance, the mixed-use commercial designation looks “purple-ish” on the legend, but a much brighter “hot pink” on the map.
- 2-18** { 17. Page ES-3 indicates “Service and deliveries would access the site from the Birch Street access.” On the other hand, Page 2-15 indicates “Service and deliveries would access the site primarily from the West Access Drive.” Please clarify as these sentences are contradictory.
- 2-19** { 18. Figure 2-7, Proposed Pedestrian and Bicycle Circulation: Please continue coordinating with Melissa Dugan, Supervising Transportation Analyst at 949-724-7384 or [mdugan@cityofirvine.org](mailto:mdugan@cityofirvine.org) on the Health & Wellness Trail (i.e., the green dashed line at the bottom in Figure 2-7 at the back of the ICMC project) and the Jamboree trail (i.e., Class 1 off-street trail and a Class II bike lane along the CCH project’s Jamboree frontage as part of the CCH project construction per Page 2-16).
- 2-20** { 19. Figure 2-8, Conceptual Rendering Looking Northwest, and Figure 2-9, Conceptual Rendering Looking Southeast: The building materials, which appear to be primarily metal and glass, appear highly reflective in nature. Given the project’s proximity to UC San Joaquin Marsh Reserve wetlands, City staff encourages using building materials that blend in with the natural landscape, minimize the light and glare, and prevent potential injuries to the wildlife (e.g., flying birds).
- 2-21** { 20. Pages 3.1-4 and 3.1-5 discuss policy b of Objective A-3 of the City of Irvine General Plan regarding the Hillside Development Ordinance. This proposed project is not subject to Chapter 5-4, Hillside Overlay District, of the Zoning Ordinance which only pertains to the Santiago Hills and San Joaquin Hills areas within Irvine. Please correct accordingly.

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- 2-22 { 21. Page 3.6-2: Clarify that building permits for OSHPD buildings are issued by OSHPD, consistent with the information indicated in footnote 2 on Page ES-2 (i.e., building permits for non-OSHPD buildings are issued by the local Chief Building Official).
- 2-23 { 22. Page 3.10-3, RTP/SCS: This section discusses the 2016-2040 RTP/SCS; however, in earlier sections, the DSEIR references the current 2020-2045 RTP/SCS (a.k.a., Connect SoCal). This section and any other impacted sections throughout the DSEIR (e.g., Section 3.12) should be updated to reflect the Final Connect SoCal plan which was adopted by SCAG's Regional Council on September 3, 2020 prior to the October 2, 2020 release of the DSEIR for the ICMC project.
- 2-24 { 23. Pages 3.10-4 and 3.10-5, City of Irvine General Plan:
  - Correct first sentence to indicate the GP was most recently update in June 2015, not June 2012.
  - Correct the project site GP designation from "Education/Public Facilities" to Educational Facilities" as indicated in our NOP comment letter dated March 18, 2020. Note the "Public Facilities" GP designation only applies to the IRWD Treatment Facility at 3512 Michelson Drive in Planning Area 23, not UCI.
- 2-25 { 24. Page 3.10-9, City of General Plan Consistency:
  - Correct the project site GP designation from "Education/Public Facilities" to Educational Facilities" as indicated in our NOP comment letter dated March 18, 2020.
  - The "Public Facilities" GP designation only applies to the IRWD Treatment Facility at 3512 Michelson Drive in Planning Area 23, not UCI. Therefore, omit the last sentence which states "Accordingly, the proposed Project would be consistent with the public facilities designation as it would be a medical center and provide a public-serving use."
- 2-26 { 25. Table 3.10-1, UCI 2007 LRDP Consistency Analysis on Page 3.10-12: The justification provided for Project Consistency for Objective 1 of the Land Use Element is inaccurate as it states "As noted above, the proposed Project is consistent with the 2007 LRDP. The addition of clinical and inpatient hospital uses on-site would promote the expansion of the UCI Health enterprise while maintaining connections and integrating with the surrounding area. Project implementation would limit impacts to surrounding natural communities, provide connections to the UCI Main Campus, and be compatible with surrounding uses." Based on the provided information for Objective 5 under the Housing Element portion of the same table on Page 3.10-13, the ICMC healthcare complex is for UCI Health enterprise purposes for providing specialty services for the region, not the University's mission.

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- 2-27 { 26. Page 3.11-28: In the second sentence in the second paragraph under the Mechanical Equipment section, confirm/correct the measurements for "...this equipment typically generates 64 dBA at 50 feet and 50 dBA at 50 feet, respectively."
- 2-28 { 27. Pages 3.13-3 and Page 3.13-8: The number of police officers and ratio to population to officers is not correct. Use the correct number and ratio: There are 243 authorized sworn personnel positions with a ratio of 0.86 officers per 1,000 population based upon 281,707 residents.

**Appendix H - Traffic Study Comments:**

- 2-29 { 28. Table 1-1, UCI North Campus Land Use Summary: Please include the AM, PM, and ADT trips for each of the land use, a summary of the total trips associated with 2007 LRDP and Proposed North Campus, and the difference in trips between the two scenarios.
- 2-30 [ 29. Figure 1-2: Show the proposed trails and sidewalk connectivity on the site plan.
- 2-31 { 30. Alternative Project Access at Graduate/Campus: In Figure 1-3, the Project Access under Alternative Scenario is shown to be offset (existing location) rather than lining up to form a four-way intersection. Provide an access analysis that evaluates the following Transportation Design Procedures (TDPs): TDP-1 Turn Lane Pocket Length, TDP-4 Right Turn Lanes at Uncontrolled Driveways, TDP-12 Signal Warrant, and TDP-14 Driveway Length.
- 2-32 [ 31. Table 3-3: Revise from "OCTAM" to "ITAM."
- 2-33 { 32. VMT Reducing Measures: The project is utilizing a 21% VMT reduction that is tied to the UCI Sustainable Transportation Program. Provide justification for using this 21% VMT reduction on a project that is off-campus and is primarily used by patients and staff.
- 2-34 { 33. Provide discussion on how the proposed project affects the 2007 LRDP mitigation measure findings. Additionally, confirm the timing of the LRDP mitigation improvements and whether any changes result from the proposed project.

Thank you for the opportunity to review and comment on the proposed project. Please add us to the project notification distribution lists (email and USPS) especially public meetings/hearings and project approval notifications. Staff appreciates the opportunity to

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November 10, 2020  
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review any further information regarding this project as the planning process proceeds.

If you have any questions, please contact Senior Planner Melissa Chao at 949-724-6395 or at [mchao@cityofirvine.org](mailto:mchao@cityofirvine.org).

Sincerely,



Marika Poynter  
Principal Planner

ec: Tammy Rivers, Management Analyst, OCFA ([TamyRivers@ocfa.org](mailto:TamyRivers@ocfa.org))  
Bruce Ramm, Security Design Concepts, Inc. ([ramm.sdc@ix.netcom.com](mailto:ramm.sdc@ix.netcom.com))  
Bobby Simmons, Emergency Management Administrator  
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Kerwin Lau, Manager of Planning Services  
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Lisa Thai, Supervising Transportation Analyst  
Claudia Landeras-Sobaih, Principal Plan Check Engineer  
Michael Yang, Water Quality Engineer  
Tom Polson, Senior Plan Check Engineer  
Michael Byrne, Senior Management Analyst  
Diane Vu, Senior Planner  
Melissa Chao, Senior Planner  
Steve Sherwood, Assistant City Engineer  
Stan Ng, Associate Engineer

## Response to Letter 2: City of Irvine

### Response to Letter 2: City of Irvine

- 2- 1:** This comment summarizes the contents of the Project Description of the Project and not at variance with the findings of the SEIR. No further comment is required.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 2- 2.** The Child Health/Medical Office (CH/MO) project was not analyzed as a single project with the ICMC because the two projects would occur under different funding programs, would operate independently, and neither project is required for the other to function. The Project and the CH/MO are separate projects and therefore, discussion of each project in the same environmental document is not appropriate nor required by CEQA.

Chapter 3.10 – Land Use and Planning discusses the CH/MO project and notes that the Project is bordered by the CH/MO which is, “approved but yet to be constructed.” The Notice of Preparation (NOP) for the Project, which was filed on February 27, 2020 stated, “the proposed UCI Center for Child Health/Medical Office Building project, which is not a part of the proposed Project, would redevelop the existing Child Development Center site as a clinical facility focusing on pediatric and adult healthcare.” The CH/MO project was approved by the UC Regents on March 19, 2020.

State CEQA Guidelines 15124 lists the required contents of the Project Description. In accordance with these requirements, the Project Description for the Project details the precise location and boundaries of the Project site and the activities proposed to be undertaken therein. The CH/MO is outside those boundaries and although both projects could be accessed via Jamboree Road, they are not considered a single project. Therefore, because the activities of the CH/MO are already permitted, are not a part of this project, and no additional permits would be issued upon approval of the Project and it is not considered as part of the Project in the SEIR. No changes to the SEIR have been made in response to this comment and no changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 2- 3.** The original Mitigated Negative Declaration (MND) for the Project lists the square footage as 168,000 sf. This value was carried over to the SEIR. No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 2-4.** Page 3.1-4 of the SEIR states, “As previously addressed in this SEIR, UCI, a constitutionally created State entity, is not subject to municipal regulations of surrounding local governments for uses on property owned or controlled by UCI that are in furtherance of the University’s education purposes. However, UCI may consider, for coordination purposes, aspects of local plans and policies for the communities surrounding the campus when it is appropriate and feasible, but it is not bound by those plans and policies in its planning efforts.”

The Irvine Campus Medical Complex (ICMC) Project is under the land use jurisdiction of the UC Regents and will not require conditional use permit approval from the Cities of Irvine or Newport Beach. While approval authority rests with the Regents, UCI has and will continue to consult and work collaboratively with the City on this project and future projects.

In response to the comment and the Projects relation to being used for educational purposes, Section 2.5.2 – Project Objectives on Page 2-10 of Chapter 2.0 Project description states: “Leverage the co-location of UCI Health research, *teaching*, inpatient and outpatient programs through a location on the Irvine Campus”

The top of page 2-10 of Chapter 2.0 Project Description prefaces the above goal by stating, “The UC Irvine Medical Center (UCIMC) is located in the City of Orange, and *it is the primary clinical teaching location* for the UCI School of Medicine.”

Page 2-13 which describes the uses of the Project, specifically the Ambulatory Care Center under the subheading Outpatient Clinics states, “Outpatient services, inclusive of Oncology, Neurosciences, Orthopedics, and Spine, would be located in the Ambulatory Care Center. Workspaces would include shared workstations, shared offices, consult/telehealth rooms, conference rooms, *and teaching areas*. Uses may include medical exam rooms, outpatient surgery services and procedure rooms, 23-hour observation rooms, and diagnostic and imaging services.”

It should be noted, the UCI mission statement is, “The University of California, Irvine's mission is to discover and disseminate knowledge through research, teaching and creative expression in acclaimed academic programs.”

Thus, based on the language of the SEIR, that with the nearest UCI medical facility in Orange being the primary clinical teaching facility, it is appropriate for UCI to use the Project in a teaching capacity. The Project would be used to better train physicians and other staff through education in order to better serve the public. Therefore, the Project would satisfy UCI’s mission.

Finally, as noted, the Project is under the land use jurisdiction of the UC Regents and will not require use approval from the Cities of Irvine or Newport Beach. While approval authority rests with the Regents, UCI has and will continue to consult and work collaboratively with the City on this important project and future projects.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 2- 5:** UCI recognizes that the use of the 3.5 acres within the UCI Arboretum would not be used for construction of the proposed facility. The Project is under the jurisdiction of the UC Regents and will not require approval from the Cities of Irvine or Newport Beach for either land use or a water quality management plan. While approval authority rests with the Regents, UCI has and will continue to consult and work collaboratively with the City on this important project and future projects.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 2- 6:** Figure 2-5 shows the LRDP land use designations for the UCI campus, including the North Campus area. The entire project site is within the Mixed-Use Commercial. The buffer area is within the Open Space-General designation, and the temporary construction laydown is located within the Open Space-Athletics & Recreation land use designation.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 2- 7:** UCI recognizes the importance of communication with the City in regard to a road closure. UCI does not anticipate the need to close a major roadway such as Jamboree Road or a lane closure as a result of Project implementation as the Project will be constructed entirely within the UCI campus. If a lane closure is needed during construction or throughout the life of the project, UCI will coordinate with the City Public Safety Department, as appropriate.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 2- 8:** Please see Response 2- 7, above. In addition, UCI will coordinate with the named City staff member as appropriate.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 2- 9:** The project includes Approval of UCI LRDP Amendment #3 to allow Inpatient uses in the North Campus land use designation of Mixed Use – Commercial. Potential effects related to land use and impacts are discussed in Section 3.10 Land Use and Planning. More specifically, Page 3.10-8 states, “An analysis of the proposed Project’s consistency with the applicable 2007 LRDP objectives is provided in Table 3.10-1: UCI Long Range Development Plan Consistency Analysis at the end of this section. The analysis concludes that the proposed Project would be consistent with applicable 2007 LRDP goals and policies. Upon approval of the 2007 LRDP Amendment #3, the proposed Project would not result in significant land use impacts related to relevant 2007 LRDP planning objectives. Therefore, the proposed Project, with the adoption of the 2007 LRDP Amendment #3, would not conflict with the 2007 LRDP.”

Table 3-10-1 UCI 2007 Long Range Development Plan Consistency Analysis further provides detail related to project consistency with the guidance in this planning document. Because Amendment #3 is included as part of the project it is included in this consistency analysis. The project was found to be consistent with applicable Objectives related to the Key Planning Objectives for the North Campus, the Land Use Element, Circulation Element, Housing Element, Open Space Element, and the Infrastructure Element. In all cases, the project was found to be consistent with the applicable objectives.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 2-10:** UCI agrees that it has worked with the City planning staff related to future developments. Please see Response 2-4 above regarding UCI not being subject to City zoning regulations.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 2-11:** Please see Response 2-4 above, regarding UCI not being subject to City zoning regulations. The project includes all applicable mitigation measures from the 2007 LRDP EIR. Further, as noted on Page 3.11-31 of the SEIR, MM-NOI-1 includes updates specific to the proposed Project and to



reflect the latest best practices and recommendations. MM-NOI-2 listed on pages 3.11-32 through 3.11-33, also has been updated to reflect current practices and recommendations. Each of these mitigation measures prescribe specific requirements that would minimize noise generation, reduce the distance between noise sensitive uses, use other mechanical or structural elements to attenuate noise, minimize daily construction time, and attenuate construction noise by using noise-reduction devices.

Regarding construction noise, the SEIR found that with the mitigation (MM-NOI-2) adopted as part of the Project, distance to sensitive receptors, compliance with construction timing, and the fact construction is variable, construction noise is punctuated and fluctuates over time, would not be concentrated or confined in the areas closest to sensitive receptors, project construction activities would result in a less than significant noise impact.

Regarding noise generated from mechanical equipment, Page 3.11-28 states, "Noise levels at the closest residences would not exceed City of Irvine's or City of Newport Beach's most stringent exterior noise level of 55 dBA during daytime hours (7:00 a.m. to 10:00 p.m.) and 50 dBA at night (10:00 p.m. to 7:00 a.m.)"

Regarding noise generated from loading areas, Page 3.11-29 states, "Therefore, loading area noise would not exceed City of Irvine's or City of Newport Beach's most stringent exterior noise level of 55 dBA during daytime hours (7:00 a.m. to 10:00 p.m.) and 50 dBA at night (10:00 p.m. to 7:00 a.m.)."

Emergency vehicle noise, as discussed on Page 3.11-29 would be intermittent, short-term in nature, and occur only under emergency conditions. The use of sirens is regulated, and ambulances use them only in urgent medical matters. They are used in getting to the hospital, but typically not on their final approach, unless a traffic signal requires it. The frequency of medical emergencies that would require visits of emergency vehicles using sirens is difficult to predict but based on experience it is understood that such use would be infrequent. Lastly, as noted in the DSEIR, "...noise for the purpose of alerting persons to the existence of an actual emergency is exempt from both the City of Irvine and City of Newport Beach noise standards pursuant to IMC Section 6-8-205(D)(3) and NBMC Section 10.26.035)."

Regarding noise generated from the parking facilities, Page 3.11-31 states, "Based on this distance, the vehicle-related noise levels would be approximately 35 dBA Leq, which would be below both the stationary source standards for Irvine and Newport Beach."

Therefore, although not required, in these instances the project is responsive to the City noise standards, and no changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**2-12:** UCI recognizes the listed City code related to construction activities. The commenter is referred to Response to Comment 11, above, which lists MM-NOI-2 (also listed in the comment) as well as describes that noise impacts would be below the most stringent City exterior noise standards. However, as an autonomous agency, deviations are not subject to the City's Chief Building Official.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**2-13:** UCI recognizes the City's desire for a new fire station. UCI is engaged in ongoing consultation with OCFA regarding coordination and collaboration on the provision of fire and emergency services to the UCI campus. These discussions have included OCFA planning studies related to the need for future fire station facilities. UCI and OCFA have not identified a site location, building program, or a funding strategy for a fire station on the UCI campus. UCI will continue to consult with OCFA on services and planning related to the campus, including planning studies for any future facilities serving UCI. As there is no currently proposal or application to construct a fire station at UCI, discussion and analysis of such a project would be speculative. As discussed on page 3.13-7 of the SEIR, because a new fire station is not proposed at this time, impacts to Threshold 3.13-1(i) would be less than significant as the construction of the ICMC project would not result in physical impacts from a new or existing fire protection facility.

Please see Response 5-2 to the letter submitted by the Orange County Fire Authority (OCFA) for additional discussion.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**2-14:** The Project would be served by the UCI Police Department.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**2-15:** The project would maintain the 150-foot (') buffer that would be sufficient for protection of the marsh habitat. This buffer, which was identified in the 2007 LRDP EIR and found to be adequate for previous uses, also would be adequate for the Project. As noted on page 3.3-5 of Section 3.3-Biological Resources, "With the adoption of the subsequent 2007 LRDP, UCI adopted the principles in the 1989 LRDP MOU as specific mitigation measures in the 2007 LRDP EIR in lieu of a subsequent MOU, including the requirement for a 150' development buffer, stormwater management measures...and other guidance to protect Marsh habitat resources during implementation of the 2007 LRDP."

Page 3.3-20 further notes, "Southern arroyo willow riparian forest and coastal sage scrub are located within the 150-foot development buffer between the Project site and the San Joaquin Marsh Reserve. No impacts to the southern arroyo willow riparian forest would occur as development is not proposed that would take this habitat."

Lastly, the Project is within the scope of intensity of use contemplated in the original 2007 LRDP EIR. While the hospital would operate on a 24-hour basis, the previous residential uses that would have been permitted by the LRDP also operate on a 24-hour basis. The Project would not result in substantial new impacts to the marsh habitat and the buffer, and as discussed above, would be sufficient as it would have been were the residential uses developed.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**2-16:** Chapter 3.3 Biological Resources discusses impacts associated with use of the Arboretum to biological resources. Table 3.3-1 Project Survey Area Vegetation Communities/Land Uses shows

that the laydown area contains approximately 0.05 acres of coastal sage scrub, 0.15 acres of existing restored coastal sage scrub, 0.03 acres of exiting disturbed coastal sage scrub, 1.87 acres of disturbed habitat, 1.0 acres of ornamental, and 1.19 acres of developed area.

Impact 3.3-1 on page 3.3-18 notes that, "The total patch of coastal sage scrub within the Arboretum is relatively small and is isolated by development to the north and east, riparian habitat and grasslands to the south, and disturbed areas to the west." The discussion continues stating, "UCI is a participating landowner within the Orange County NCCP/HCP. For participating landowners, development activities and uses that are addressed by the Orange County NCCP/HCP are considered fully mitigated under the Natural Community Conservation Planning Act (NCCP Act), FESA, and CESA for impacts to habitats occupied by listed and other species "identified" by the Orange County NCCP/HCP and its associated IA. Therefore, this Project is exempt from any additional mitigation for impacts to "identified" species and their habitat (i.e., coastal California gnatcatcher). The only further action that would be required would be to avoid any active nests, if present."

Therefore, while some coastal sage scrub habitat would be lost, it is fully mitigated. Additionally, as discussed on page 3.3-22, the need for restoration, within the site (or as relocation to the UCI Main Campus) is not needed for the temporary disturbance areas (construction laydown area and parking area) because the areas are already degraded and they would revegetate on their own.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 2-17:** The Mixed Use-Commercial as noted in the legend is the colored parcel adjacent to Jamboree Road on the map. While the colors do vary slightly, because no other similar colors are used, the legend and area are discernable and do not require an update in the final document.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 2-18:** Based on information provided in the comment, the Final SEIR has been updated to show that the service and deliveries would take access from the West Access Drive.

This change was made for clarification purposes and does not alter the significance findings of any impact and does not constitute substantial new evidence. No other changes to the Draft SEIR have been made.

- 2-19:** Related to the proposed pedestrian and bicycle circulation elements that would be included in the project, UCI will continue to coordinate, as appropriate, with City of Irvine staff.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 2-20:** Page 2-18 of chapter 2.0 Project Description notes that the buildings would convey an urban character and that buildings would be constructed primarily of concrete, brick, or stone masonry consistent with the architectural design guidelines in the UCI Physical Design Framework. The building would incorporate exterior design measures to limit the impacts to birds and other wildlife in the San Joaquin Marsh Reserve. Proposed building materials may include metal panels

and trim, curtain walls, and pre-cast panels. Ground level building would incorporate glass and metals.

Chapter 3.2 Aesthetics also includes a discussion of the building materials and includes mitigation to reduce glare and impacts. In part MM-AES-1 states, "...UCI shall ensure that the projects include design features to minimize glare impacts. These design features shall include use of non-reflective exterior surfaces and low-reflectance glass (e.g., double or triple glazing glass, high technology glass, low-E glass, or equivalent materials with low reflectivity) on all Project surfaces that could produce glare."

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 2- 21:** Pages 3.1-4 and 3.1-5 do include a brief discussion of hillside development. This discussion also includes a note that the City of Irvine General Plan does not specifically dedicate an element to visual resources or aesthetics. Therefore, while the SEIR does not include analysis of project consistency with city policies, this discussion was included for context.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 2- 22:** Based on information provided in the comment, the text on page 3.6-2 has been revised in the Final SEIR for clarification that building permits for OSHPD buildings are issued by OSHPD. The role of OSHPD standards and permitting is described throughout the SEIR, including OSHPD's role as a responsible agency (2-25).

This change was made for clarification purposes and does not alter the significance findings of any impact and does not constitute substantial new evidence. No other changes to the Draft SEIR have been made.

- 2-23:** The RTP/SCS date of 2020-2045 is correct for use in the earlier chapters as noted by the commenters. Based on information provided in the comment, page 3.10-3 of the Final SEIR has been revised for clarification.

This change was made for clarification purposes and does not alter the significance findings of any impact and does not constitute substantial new evidence. No other changes to the Draft SEIR have been made.

The comment also notes that Chapter 3.12 – Population and Housing, should be updated with the more recent RTP/SCS. Regarding the Population and Housing Chapter, the 2020-2045 RTP/SCS does not provide updated population numbers as were found in the 2016 SCAG document. The 2016 SCAG document provided values for population projections, household projections, jobs to housing projections, and employment projections for both the City of Irvine and Orange County. These values were provided for 2012, 2020, 2035, and 2040. These same values were not provided in the revised SCAG document. The numbers reflected in the SDEIR provide valuable detail regarding potential impacts related to population and housing and due to the relatively minimal time differential (less than 4 years) and large area to which they apply, are still appropriate for discussion. Further, because the NOP was filed prior to the adoption of the new RTP/SCS and the number

cannot be replicated because the data is not provided in the new RTP/SCS, this portion of the Draft SEIR has not been revised.

**2-24:** The text on pages 3.10-4 and 3.10-5 has been revised for clarification based on this comment.

This change was made for clarification purposes and does not alter the significance findings of any impact and does not constitute substantial new evidence. No other changes to the Draft SEIR have been made.

**2-25:** Based on information provided in the comment, the text on pages 3.10-4 and 3.10-5 has been revised in the Final SEIR for clarification.

This change was made for clarification purposes and does not alter the significance findings of any impact and does not constitute substantial new evidence. No other changes to the Draft SEIR have been made.

**2- 26:** The commenter is referred to Response to Comment 4, above. In addition, it should be noted that the Project and medical uses are a “not-for-profit” teaching hospital. Thus, the Project is consistent, as discussed above with the UCI mission and the project consistency for Objective 1 is true and accurate as written.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**2-27:** Based on information provided in the comment, the text on page 3.11-28 has been revised in the Final SEIR for clarification.

This change was made for clarification purposes and does not alter the significance findings of any impact and does not constitute substantial new evidence. No other changes to the Draft SEIR have been made.

**2-28:** Based on information provided in the comment, the text on page 3.13-3 and 3-13-8 have been revised for clarification.

These changes were made for clarification purposes and does not alter the significance findings of any impact and does not constitute substantial new evidence. No other changes to the Draft SEIR have been made.

**2-29:** With the 2018 CEQA Guidelines Update, which came into effect on December 28, 2018, VMT was adopted as the standard to analyze transportation impacts and, as such, LOS is no longer considered the standard to measure transportation impacts under CEQA. Per updated sections of CEQA, the peak hour and trip generation from the 2007 LRDP and Proposed North Campus is not applicable to the CEQA analysis.

**2-30:** The Final SEIR has been revised to clarify that no trails will be located within the 150-foot Buffer Area.

**2-31:** If the Graduate/Campus project access is selected as the preferred alternative, a TDP analysis will be prepared prior to design similar to the proposed project.

**2-32:** This table heading is revised in Appendix G.

**2- 33:** The project is located in UCI's North Campus area and UCI's Sustainable Transportation Program includes this portion of the campus. The performance standards (trip reduction requirements) that are applied to the general campus also apply to UCI's North Campus, specifically, to staff who will have a daily commute. The programs offered to staff on the general campus would be offered to all future staff working in the North Campus. Assistance to patients will also be evaluated by UCI.

The California Air Pollution Control Officers Association (CAPCOA) provides quantifying greenhouse gas mitigation measures. Mitigation Measure TRT-2 Implement Commute Trip Reduction Project Required Implementation Monitoring<sup>1</sup> provides substantial evidence that TDM programs with an established performance standard (i.e., trip reduction requirements), required implementation, and regular monitoring and reporting can have a range of effectiveness upwards of 21.0% VMT reduction and commute trip GHG emissions.

**2-34:** Please see Table 1 at the end of this response regarding UCI's compliance with LRDP EIR mitigation measure Tra-1. As discussed on page 4.13-54 of the 2007 LRDP EIR, the UCITP intersections are not located within UCI's jurisdiction, and, as such, would be planned, designed, and implemented by the owning entity.

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<sup>1</sup> CAPCOA, 2010. Quantifying Greenhouse Gas Mitigation Measures. Page 63. <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf> Accessed December 2, 2020.

**Table 1: UCI LRDP Mitigation Measure Tra-1 Monitoring**

<i>Measure</i>	<i>Status &amp; Summary of Actions</i>
<p><b>TRA-1A:</b> To reduce on- and off-campus vehicle trips and resulting impacts, UCI will continue to implement a range of Transportation Demand Management (TDM) strategies. Program elements will include measures to increase transit and shuttle use, encourage alternative transportation modes including bicycle transportation, implement parking polices that reduce demand, and implement other administrative mechanisms that reduce vehicle trips to and from the campus. UCI shall monitor the performance of TDM programs through annual surveys.</p>	<p>Since 2007 UCI has implemented a comprehensive program of TDM measures resulting in an average vehicle ridership of 2.06 (based on 2019 survey), the highest of any employer greater than 3,000 in the Orange, Los Angeles, and Riverside County SCAQMD. UCI's annual investment in TDM measures is approximately \$5 million.</p> <ul style="list-style-type: none"> <li>• UCI shuttle system ridership was 2.2 million passengers at a cost of \$2.8 million.</li> <li>• "University Pass" transit program with 80% subsidy for unlimited OCTA ridership and coordination OCTA of routes</li> <li>• 20% rebate on commuter Metrolink and Amtrak train passes</li> <li>• Incentivized vanpool, carpool, ridesharing programs</li> <li>• Zipcar car sharing program with 6,000 on campus members</li> <li>• Bicycle program highlights include "ZotWheels," the first bike sharing system in the region; over 3,000 bike parking spaces; significant investment in bikeway infrastructure; bicycle education for campus affiliates of all bicycling levels offered quarterly; and major bi-annual bike education festivals to encourage safe and legal riding.</li> </ul>
<p><b>TRA-1B:</b> UCI will continue to pursue the implementation of affordable on-campus housing to reduce peak-hour commuter trips to the campus.</p>	<p>With the opening of the Middle Earth Expansion and East Campus Student Apartments Phase IV-A in the Fall 2019 quarter, UCI has constructed 5,000 beds of on-campus student housing since 2007. Additionally, UCI amended its 2007 LRDP in September 2019 to increase the total student bed capacity from 50% to 60% of enrollment to accommodate future expansion of the on-campus student housing program.</p> <p>UCI has constructed or approved 708 affordable on-campus faculty and staff homes at a cost of \$275 million since 2007. Approximately two-thirds of UCI faculty live on campus.</p>
<p><b>TRA-1C:</b> To enhance transit systems serving the campus and local community, UCI will work cooperatively with the City of Irvine, City of Newport Beach, OCTA and other local agencies to coordinate service and routes of the UCI Shuttle with existing and proposed shuttle and transit programs including the proposed Jamboree/IBC Shuttle, proposed Orange County Great Park Shuttle, Irvine Spectrum Shuttle, and other community transit programs.</p>	<p>UCI works collaboratively with the local community to coordinate transit service including the City of Irvine Transportation Coordination committee to coordinate City-wide transit programs such as the UCI Shuttle, City I-Shuttle, bike programs, and other transit needs.</p> <p>UCI collaborates regularly with OCTA regarding bus routing, schedules, and UCI ridership.</p>
<p><b>TRA-1D:</b> UCI will monitor campus trip generation and distribution and the performance of UCITP intersections in relationship to enrollment growth. Monitoring will be conducted in consultation with the City of Irvine and the City of Newport Beach, and will occur at each 3,000-student increase in enrollment (measured as General Campus three-term average headcount), above the 2007-08</p>	<p>With the 2018 CEQA Guidelines Update, which came into effect on December 28, 2018, VMT was adopted as the standard to analyze transportation impacts and, as such, LOS is no longer considered the standard to measure transportation impacts under CEQA.</p> <p>However, in 2018, UCI reached the second 3,000-student-enrollment increase threshold and initiated monitoring of UCITP intersections.</p>

<p>General Campus enrollment level. If UCI monitoring determines that LRDP traffic results in significant traffic impacts at UCITP intersections, UCI will implement measures to reduce vehicle trips contributing to the impact or provide “fair share” funding for improvements at the impacted intersections as described in Mitigation Measures Tra-1E and Tra-1F. UCI’s share of funding will be determined by the percentage of UCI traffic volumes compared to the total traffic volumes at the impacted intersections.</p>	<p>The 2016 and 2018 analyses both found all UCITP intersections operating at an acceptable level of service of D or higher.</p>
<p><b>TRA-1E:</b> UCI will collect UCITP traffic fees from “for-profit” development projects on campus or other campus development as determined by the University. Fees will be provided to the City of Irvine, City of Newport Beach, or other public agencies to fund UCI’s share of UCITP improvements when the improvements are implemented, as provided in mitigation measure Tra-1D.</p>	<p>With the 2018 CEQA Guidelines Update, which came into effect on December 28, 2018, VMT was adopted as the standard to analyze transportation impacts and, as such, LOS is no longer considered the standard to measure transportation impacts under CEQA.</p> <p>No for-profit development has occurred on campus since 2007; therefore, no for-profit traffic fees have been collected.</p>
<p><b>TRA-1F:</b> If the City of Irvine or City of Newport Beach implements UCITP improvements following UCI determination that LRDP traffic is causing a significant impact, and UCITP fees collected to date are insufficient to fund UCI’s fair share, UCI shall identify and obtain funding for the fair share of identified improvements from an alternative source.</p>	<p>With the 2018 CEQA Guidelines Update, which came into effect on December 28, 2018, VMT was adopted as the standard to analyze transportation impacts and, as such, LOS is no longer considered the standard to measure transportation impacts under CEQA.</p> <p>However, UCI currently holds a traffic fee balance of \$2.6 million as a result of traffic fee credits from the City of Irvine, but no determination of impact has been identified by a UCI project. 2007 LRDP EIR estimated that UCI additionally generates \$2 million per year in Measure M funds for off-campus transportation improvements.</p>
<p><b>TRA-1G:</b> UCITP fees established for future “for-profit” development on UCI’s North Campus shall be commensurate with the traffic fees established in the City of Irvine’s IBC Transportation Fee program.</p>	<p>No for-profit development projects have occurred at the North Campus. Additionally, with the 2018 CEQA Guidelines Update, which came into effect on December 28, 2018, VMT was adopted as the standard to analyze transportation impacts and, as such, LOS is no longer considered the standard to measure transportation impacts under CEQA.</p>
<p><b>TRA-1H:</b> UCI will assess a San Joaquin Hills Transportation Corridor fee to future “for-profit” campus development projects in accordance with the development fee program established by the Joint Powers Agreement entered into by the City of Irvine, the County of Orange, and neighbor cities to help pay for the San Joaquin Hills Transportation Corridor. Future “for-profit” campus development shall be required to pay such fees prior to construction. UCI’s obligation to pay its share of the costs of the San Joaquin Hills Transportation Corridor shall be satisfied upon the</p>	<p>SJHTC fees have been paid for all University Hills faculty/staff homes. No for-profit projects have occurred since adoption of the 2007 LRDP.</p>



<p>forwarding of these fees to the Transportation Corridor Agencies or other agency designated to collect such fees.</p>	
<p><b>TRA-1I:</b> UCI shall review individual projects proposed under the 2007 LRDP for consistency with UC Sustainable Transportation Policy and UCI Transportation Demand Management goals to ensure that bicycle and pedestrian improvements, transit stops, and other project features that promote alternative transportation are incorporated to the extent feasible.</p>	<p>All UCI projects undergo review for consistency with UC Sustainable Transportation Policy and UCI TDM goals.</p>
<p><b>TRA-1J:</b> If a campus construction project or a specific campus event requires an on-campus lane or roadway closure, or could otherwise substantially interfere with campus traffic circulation, the contractor or other responsible party will provide a traffic control plan for review and approval by UCI. The traffic control plan shall ensure that adequate emergency access and egress is maintained and that traffic is allowed to move efficiently and safely in and around the campus. The traffic control plan may include measures such as signage, detours, traffic control staff, a temporary traffic signal, or other appropriate traffic controls. If the interference would occur on a public street, UCI shall apply for all applicable permits from the appropriate jurisdiction.</p>	<p>MM Tra-1J is implemented on all UCI projects.</p>

### Letter 3: Orange County Transportation Authority



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November 16, 2020

**Ms. Lindsey Hashimoto**  
 University of California, Irvine  
 Campus Physical and Environmental Planning  
 4199 Campus Drive, Suite 380  
 Irvine, CA 92697

**Subject: Notice of Availability and Public Hearing for the UCI Campus Medical Complex**

Dear Ms. Hashimoto:

Thank you for providing the Orange County Transportation Authority (OCTA) with a copy of the Notice of Availability (NOA) of a Subsequent Environmental Impact Report (SEIR) and Public Hearing for the Irvine Campus Medical Complex Project (Project). The following comments are provided for your consideration:


- 3-1 • While CEQA now uses vehicle miles traveled to identify transportation impacts, OCTA still requires level of service analysis to monitor Congestion Management Program (CMP) Highway System (HS) performance, per the CMP Traffic Impact Analysis Requirements. The Orange County CMP requires a CMP Traffic Impact Analysis (TIA) for any development project that meets the adopted trip generation thresholds: (1) 2,400 or more daily trips; or (2) 1,600 or more daily trips for projects that directly access the CMPHS. The proposed project meets the trip generation threshold and thus requires a CMP TIA. Such analysis may be submitted to OCTA separately from any CEQA documents. For more information, please refer to the 2019 CMP Report available here: <http://www.octa.net/Projects-and-Programs/Plans-and-Studies/Congestion-Management-Program/Overview/>
- 3-2 • Please note that Jamboree Road and MacArthur Boulevard are part of the CMPHS. Additionally, the Jamboree Road and MacArthur Boulevard intersection is a CMP intersection. These roadways and this intersection should be analyzed as such for any potential traffic impacts consistent with the Orange County CMP.

*Orange County Transportation Authority*  
 550 South Main Street / P.O. Box 14184 / Orange / California 92863-1584 / (714) 560-OCTA (6282)

Ms. Hashimoto  
November 16, 2020  
Page 2

Throughout the development of this project, we encourage communication with OCTA on any matters discussed herein. If you have any questions or comments, please contact me at (714) 560-5907 or at [dphu@octa.net](mailto:dphu@octa.net).

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan Phu', with a stylized flourish at the end.

Dan Phu  
Manager, Environmental Programs

**Response to Letter 3: Orange County Transportation Authority**

- 3-1:** This comment summarizes the requirements for the revised CEQA Guidelines related to vehicles miles travelled. The comments on the Draft SEIR are not at variance with the findings of the document nor request additional information or clarification. UCI will continue to work with OCTA related to the project and provision of transit opportunities.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further response is required.

- 3-2:** This comment notes that Jamboree Road and MacArthur Boulevard are part of the CMPHS and the Jamboree Road and MacArthur Boulevard intersection is a CMP intersection. The traffic analysis in the SEIR is consistent with the Governor's Office of Planning and Research current guidelines for traffic impacts analysis. The comments on the Draft SEIR are not at variance with the findings of the document nor request additional information or clarification. UCI will continue to work with OCTA related to the Project and provision of transit opportunities.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further response is required.

## Letter 4: Transportation Corridor Agencies

San Joaquin Hills  
Transportation  
Corridor Agency

Chair:  
Patricia Kelley  
Mission Viejo



**Transportation Corridor Agencies™**

Foothill/Eastern  
Transportation  
Corridor Agency

Chair:  
Christina Shea  
Irvine

October 27, 2020

Via E-mail to: [hashimol@uci.edu](mailto:hashimol@uci.edu)

Lindsey Hashimoto, Senior Planner  
Office of Physical and Environmental Planning  
University of California, Irvine  
4199 Campus Drive, Suite 380  
Irvine, CA 92697

Subject: Notice of Availability of a Subsequent Environmental Impact Report for the Irvine Campus Medical Complex (SCH# 2020029099)

Dear Ms. Hashimoto:

4-1

The Transportation Corridor Agencies (TCA) has reviewed the Subsequent Environmental Impact Report (SEIR) for the Irvine Campus Medical Complex, SCH# 2020029099, (Project). TCA understands that the proposed Project would develop a UCI Health integrated medical campus providing inpatient, ambulatory, and emergency care services. TCA thanks you for the opportunity to comment on the SEIR for the Project.

At this time TCA does not have specific comments on the SEIR, but requests to be kept on the distribution list. Additionally, please note, the Project is within the San Joaquin Hills Transportation Corridor Agency Fee Program Area Zone B and may require payment of Development Impact Fees as a condition of issuing building permits pursuant to the Major Thoroughfare and Bridge Fee Program adopted in 1988. Should you have any questions regarding this requirement, please contact Greg Walker, Manager of Internal Audit at (949) 754-3438 or via email at [gwalker@thetollroads.com](mailto:gwalker@thetollroads.com).

TCA looks forward to receiving all future notices, the final environmental document, along with any other forthcoming documentation for the Project. TCA appreciates the opportunity to provide input to your planning process. If you have questions or require additional information, please do not hesitate to contact me at 949.754.3487 or via email at [vgomez@thetollroads.com](mailto:vgomez@thetollroads.com).

Thank you,

Virginia Gomez  
Environmental Analyst

cc: Greg Walker, Manager of Internal Audit

125 Pacifica, Suite 100, Irvine, CA 92618-3304 • (949) 754-3400 Fax (949) 754-3467  
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**Response to Letter 4: Transportation Corridor Agencies**

**4-1:** This comment summarizes the Transportation Corridor Agencies (TCA) understanding and review of the Project and SEIR, and notes that TCA does not have any comments but would like to stay on the mailing list. The comment also references the San Joaquin Hills Transportation Corridor Agency Fee Program Area Zone B and provides contact information. UCI is aware of the impact fee program but notes that the project is a not-for-profit medical complex development consistent with the University's mission. As such, these fees do not apply to this project. UCI will contact TCA should any need arise.

The comments on the Draft SEIR are not at variance with the findings of the document nor request additional information or clarification.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

**Letter 5: Orange County Fire Authority**



**ORANGE COUNTY FIRE AUTHORITY**

P. O. Box 57115, Irvine, CA 92619-7115

1 Fire Authority Way, Irvine, CA 92602

Brian Fennessy, Fire Chief • www.ocfa.org • (714) 573-6000 | Fax (714) 368-8843

November 10, 2020

University of California, Irvine  
 Campus Physical and Environmental Planning  
 Attn: Lindsey Hashimoto, Senior Planner hashimol@uci.edu  
 4199 Campus Drive, Suite 380  
 Irvine, CA 92697-2325

Ref: Irvine Campus Medical Complex Draft Subsequent Environmental Impact Report SCH NO. 2020029099

Dear Lindsey:

5-1 Thank you for the opportunity to review the subject document. The Orange County Fire Authority (OCFA) provides fire protection and emergency medical services response to the project area. Services include: structural fire protection, emergency medical and rescue services, education and hazardous material response. OCFA also participates in disaster planning as it relates to emergency operations, which includes high occupant areas and school sites and may participate in community disaster drills planned by others. Resources are deployed based upon a regional service delivery system, assigning personnel and equipment to emergency incidents without regard to jurisdictional boundaries. The equipment used by the department has the versatility to respond to both urban and wildland emergency conditions. The following are our comments:

5-2 We believe this project along with its subsequent phases will have a cumulative Significant Impact to emergency response and will create a need for a new fire station to serve this area.

- As stated on page 3.13-7, OCFA has been in discussion with UCI regarding the increasing needs of emergency services to the project and its surrounding areas. As to the new station being speculative based on the lack of applications of development plans from OCFA, this application cannot be submitted until OCFA has a clearly entitled site definition (i.e. size, location, and station complement). This has yet to be finalized in the previously mentioned discussions between OCFA and UCL

- 5-3 • Although the medical complex would not directly increase population to the community, it will increase the service needs to the project area through the increase of a commuter population.

5-4 Environmental Settings Connection:

*Please make the following corrections to OCFA's Environmental Settings Portion of your document.*

OCFA is responsible for responding to emergencies that occur on the UCI campus. OCFA provides fire prevention/suppression and emergency services to 23 cities in Orange County and all unincorporated areas and operates 77 fire stations, 12 of which are serving the City of Irvine, UCI and JWA. OCFA is responsible for protecting 587 square miles, including 190,822 acres of wildland, and over 1.9 million residents (OCFA, July 1, 2020). OCFA Reserve Firefighters work 10 stations throughout Orange County. The City of Irvine, including the UCI Campus, falls within the service area of OCFA Division II, Battalion 5.

Serving the Cities of: Aliso Viejo • Buena Park • Cypress • Dana Point • Irvine • Laguna Hills • Laguna Niguel • Laglilla Woods • Lake Forest • La Palma • Los Alamitos • Mission Viejo • Rancho Santa Margarita • San Clemente • San Juan Capistrano • Seal Beach • Santa Ana • Stanton • Tustin • Villa Park • Westminster • Yorba Linda • and Unincorporated Areas of Orange County

RESIDENTIAL SPRINKLERS AND SMOKE DETECTORS SAVE LIVES

UCI Medical Complex EIR

Page 2

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- 5-4 cont'd { OCFA's adopted standard for response times is seven minutes and 20 seconds for 80 percent of emergency calls.
- 5-5 { Other Mitigation Measures necessary to reduce impact include:
- Fire department all weather access shall be provided all around all buildings per OCFA Guidelines (B-09)
- 5-6 {
- Structures of this size and occupancy are required to have automatic fire sprinkler systems designed per NFPA 13 as required in the current CBC, CFC.
- 5-7 {
- A water supply system to supply fire hydrants and automatic fire sprinkler systems is required. Fire flow and hydrant spacing shall meet the minimums identified in the codes. Please refer to the CFC Appendix section. These tables are also located in OCFA Guideline B09, Attachment 23.
- 5-8 {
- Ensure that proposed project meets the current California Fire Code, OCFA Fire Master Plans for Commercial & Residential Development (B-09) Guideline, OCFA High-Rise Building (H-01) Guideline, and OCFA Architectural Review (E-04) Guideline.

If you need additional information regarding this letter, please contact me at (714) 573-6199.

Respectfully,

Tamera Rivers  
 Management Analyst  
[tamyrrivers@ocfa.org](mailto:tamyrrivers@ocfa.org)  
 714-573-6199

CC:

OCFA Assistant Chief Jim Ruane  
 OCFA Fire Marshal Lori Smith  
 OCFA Division Chief Shane Sherwood  
 OCFA Deputy Chief Tim Kerbrat  
 OCFA Fire Safety Engineer Robert Distaso  
 OCFA Property Manager Patrick Bauer  
 OCFA ECC Manager Jeff Logan  
 City of Irvine Senior Planner Melissa Chao



## Response to Letter 5: Orange County Fire Authority (OCFA)

- 5-1:** This comment summarizes the Orange County Fire Authority (OCFA) review of the Project and summarizes the OCFA roles and responsibilities.

The comments on the Draft SEIR are not at variance with the findings of the document or request additional information or clarification. No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

- 5- 2:** This comment states that the Project will have a cumulative significant impact to emergency response that creates a need for a new fire station to serve the area. The Project is consistent with the intensity of development of the project site that was reviewed in the 2007 LRDP EIR, and which considered cumulative impacts of development under that plan, including development of the project site, on emergency response and the need for a new fire station. The 2007 LRDP EIR described that full buildout under the LRDP would potentially contribute to the need for a new fire station due to increases in demand on stations #4 and #28. However, because a new fire station would be subject to its own environmental review and compliance with CEQA as well as local, state, and federal requirements, the EIR included that any adverse impacts would require appropriate mitigation measures to reduce impacts to the physical environment. Therefore, the 2007 LRDP EIR concluded that full buildout under the LRDP would lead to less than significant cumulative impacts related to the need for a new fire station. As a result, the 2007 LRDP EIR.

UCI agrees with OCFA that UCI and OCFA have been in discussion regarding a new fire station. UCI is engaged in ongoing consultation with OCFA regarding coordination and collaboration on the provision of fire and emergency services to the UCI campus. These discussions have included OCFA planning studies related to the need for future fire station facilities. UCI and OCFA have not identified a site location, building program, or a funding strategy for a fire station on the UCI campus. UCI will continue to consult with OCFA on services and planning related to the campus, including planning studies for any future facilities serving UCI. As there is no currently proposed project to construct a fire station at UCI, discussion and analysis of such a project would be speculative. As discussed on page 3.13-7 of the SEIR, because a new fire station is not proposed at this time, impacts to Threshold 3.13-1(i) would be less than significant as the construction of the ICMC project would not result in physical impacts to new or existing fire protection facilities.

Accordingly, page 3.13-7 of the SEIR states:

“OCFA has informed UCI regarding OCFA interest in constructing a new fire station within Battalion 5 to serve the Irvine Business Complex (IBC) district, which is adjacent to the North Campus. This would provide an additional fire station in the immediate vicinity of the North Campus, improving fire services to the project site and surrounding areas in the city of Irvine. This is consistent with the 2007 LRDP EIR, which discussed OCFA plans for a new 9,000 square foot station. As discussed in the 2007 LRDP EIR, the physical adverse impacts associated with the construction of the fire station would include short-term construction-related and would be subject to CEQA review and compliance with local, state and federal environmental requirements and would include appropriate mitigation to reduce potential impacts to the physical environment. The 2007 LRDP EIR

found that with this review adverse physical impacts resulting from construction and operation of a new fire station to serve cumulative regional demand would be less than significant.

While the planning for a new fire station remains speculative as no applications of development plans have been submitted by OCFA, UCI will continue to cooperate with OCFA in any future feasibility analysis for a new fire station located on, or in the vicinity of, the North Campus. Therefore, implementation of the proposed Project would have a less than significant impact regarding the construction of new or physically altered fire protection facilities. No mitigation is required.”

UCI disagrees that the inclusion of an undetermined location of a future fire station is not speculative. Consideration of the evaluation of these unknown impacts such as that recommended by the commenter would be speculative given specific environmental conditions of a site, impacts on the site, and mitigation could not be properly or adequately determined. It should be noted that State CEQA Guideline § 15145 Speculation states,

*“If, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact.”*

Therefore, the SEIR does not improperly defer discussion of impacts disclosure of the provision of a new OCFA fire station. No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further discussion is required.

- 5-3:** SEIR does discuss potential for an increased demand for fire services due to the increase of workers on the project site. This would include potential accidents and emergencies. As discussed on page 3.13-7 the following is stated:

*“While the hospital would not directly increase population growth within Fire Station #28’s service area, the patients, workers, and potential accidents and emergencies on site would result in an incremental increase in calls for service. Overall, the increase in calls would be minimal in comparison to the overall population and existing structures already served by OCFA fire stations in vicinity of the proposed Project; therefore, the increase for fire protection and medical emergency response are not anticipated to be substantial in this regard.”*

Considering the above text, the SEIR does consider the commuter population. This potential impact is discussed in general terms because it is not possible to attach a specific call volume to such incidents and would be speculative because of the number of unknown variables. The commenter is referred to Response 5-2 above regarding use of speculation and substantial evidence to determine impacts. Therefore, while UCI appreciates OCFA’s comments, the determination in the SEIR impacts to emergency services would not be substantial in this regard, is the appropriate conclusion.

- 5-4:** The comment includes suggestions regarding changes and minor corrections to the text of the SEIR. This Final SEIR has been revised to include the suggested changes.
- 5-5:** The comment requests mitigation to further define the emergency access around the building. The SEIR states that adequate emergency access and emergency water infrastructure would be provided and that the project would meet applicable building and fire codes, but does not specifically call out the applicable codes. To clarify these requirements, page 3.13-7 of the Final SEIR has been updated with the following text for clarification.

“To help reduce demands on OCFA services, the Project would be designed to comply with building and fire codes and include appropriate fire safety measures and equipment, including but not limited to, use of fire retardant building materials, inclusion of emergency water infrastructure (e.g., fire hydrants and sprinkler systems – including automatic fire sprinkler systems designed per NFPA 13 as required in the current CBC, CFC, and conformance to the CFC Appendix section/OCFA GuidelineB09, Attachment 23 related to hydrants and spacing), installation of smoke detectors and fire extinguishers, emergency response notification systems and provision of adequate emergency access including all weather access all around all buildings per OCFA Guidelines (B-09). Lastly, the proposed project would conform to all other CFC requirements, the OCFA Fire Master Plans for Commercial & Residential Development (B-09) Guideline, OCFA High-Rise Building (H-01) Guideline, and OCFA Architectural Review (E-04) Guideline. As such, with implementation of the proposed Project, the existing fire stations in the vicinity of the UCI campus would be adequate to meet the increases in demand for fire protection and emergency medical response services associated with the Project, and no additional new or physically altered facilities would be necessary.”

This change was made for clarification purposes and does not alter the significance findings of any impact and does not constitute substantial new evidence. No other changes to the Draft SEIR have been made based on this comment.

- 5-6:** The commenter request mitigation to further define the fire sprinkler system. The SEIR states that it would be built to conform to all fire and building codes. Although not specifically stated in the impacts discussion, the fire sprinkler system would be required to conform to the CBC and CFC and all other elements of these codes, which would be verified as part of the Project design process. To further clarify this, page 3.13-7 of the FSEIR has been revised as shown in Response 5-5, above.
- 5-7:** The commenter request mitigation to further define fire flow and hydrant spacing identified in the codes. More specifically, the commenter refers to the CFC Appendix section and notes the requirements also are located in OCFA GuidelineB09, Attachment 23. Although not specifically stated in the impacts discussion, fire flow and hydrant spacing would be required to conform to the CBC and CFC and all other elements of these codes, which would be verified as part of the Project approval process. To further clarify this, page 3.13-7 of the FSEIR has been revised as shown in Response 5-5, above.
- 5-8:** The commenter request mitigation to further clarify the requirement that the Project meet CFC requirements, OCFA Fire Master Plans for Commercial & Residential Development (B-09) Guideline, OCFA High-Rise Building (H-01) Guideline, and OCFA Architectural Review (E-04)

Guideline. As discussed above, all these elements would be verified prior to project approval. To further clarify this, page 3.13-7 of the FSEIR has been revised as shown in Response 5-5, above.

## Letter 6: South Coast Air Quality Management District



SENT VIA E-MAIL:

November 16, 2020

[hashimol@uci.edu](mailto:hashimol@uci.edu)

Lindsey Hashimoto, Senior Planner  
University of California, Irvine  
Campus Physical and Environmental Planning  
4199 Campus Drive, Suite 380  
Irvine, California 92697

**Draft Subsequent Environmental Impact Report (Draft SEIR) for Proposed Irvine Campus Medical Complex Project (Proposed Project) (SCH No.: 2020029099)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments include a recommended revision to the air dispersion modeling, South Coast AQMD's permits, and compliance with South Coast AQMD rules and regulations that the Lead Agency should include in the Final SEIR.

**South Coast AQMD Staff's Summary of Project Description**

The Lead Agency proposes to demolish 11,838 square feet of existing infrastructure and construct a 360,000-square-foot hospital, a 225,000-square-foot medical office building, and 710,596 square feet of parking on 14.5 acres (Proposed Project). The Proposed Project is located at the University of California, Irvine campus near the southwest corner of Jamboree Road and Campus Drive within the City of Irvine. Construction is anticipated to begin in April 2021 and will be completed by October 2023<sup>1</sup>. Once operational in 2023, the Proposed Project will generate 8,550 average daily trips and include the operation of a central plant building which will include the use of stationary source equipment such as boilers and backup emergency generators<sup>2</sup>. The nearest existing sensitive receptors (i.e. residential uses) to the Proposed Project are located 450 feet west of the Proposed Project<sup>3</sup>.

**South Coast AQMD Staff's Summary of the Air Quality Analysis**

In the Air Quality Analysis Section of Draft SEIR, the Lead Agency quantified the Proposed Project's regional construction and operational emissions and compared those emissions to South Coast AQMD's regional air quality CEQA significance thresholds for construction and operation. Based on the analysis, the Lead Agency found that the Proposed Project's regional construction air quality impacts would be less than significant before implementation of Mitigation Measure AQ-1 (MM AQ-1), which includes, but is not limited to, fugitive dust control measures, use of alternatively fueled construction equipment, where feasible, and use of low VOC coatings<sup>4</sup>. The Proposed Project's regional operational air quality impacts from NOx emissions would be significant at 82 pounds per day (lbs/day), which is above South Coast

<sup>1</sup> Draft SEIR, Executive Summary, Page ES-4.

<sup>2</sup> Draft SEIR, Section 3.2 Air Quality, Page 3.2-22 to 3.2-23.

<sup>3</sup> *Ibid*, Page 3.2-12.

<sup>4</sup> *Ibid*, Pages 3.2-21, 3.2-25 to 3.2-26.

6-1

Lindsey Hashimoto

November 16, 2020

6-1  
Cont'd

AQMD's regional air quality CEQA significance threshold for operational NOx emissions at 55 lbs/day<sup>5</sup>. The Lead Agency is committed to implementing Mitigation Measure AQ-2 (MM AQ-2) and Mitigation Measure AQ-3 (MM AQ-3). MM AQ-2 requires rideshare incentives, expansion of shared transit systems, and use of Best Available Control Technology (BACT) for stationary sources<sup>6</sup>. MM AQ-3 requires that the backup diesel generator meet Tier 4 engine standards or use a Level 3 Verified Diesel Emission Control System<sup>7</sup>. With implementation of MM AQ-2 and MM AQ-3, the Proposed Project's operational NOx emissions would be reduced to 38 lbs/day<sup>8</sup>.

The Lead Agency analyzed the Proposed Project's localized air quality impacts and found they were less than significant<sup>9</sup>.

The Lead Agency conducted a construction Health Risk Assessment (HRA) and modeled the construction exhaust emissions in AERSCREEN to determine pollutant concentrations from mobile sources (i.e. off-road equipment). The highest calculated cancer risk during construction would be 7.23 in one million<sup>10</sup>, which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk<sup>11</sup>. The Lead Agency also modeled operational stationary source emissions in AERSCREEN to determine pollutant concentrations from boilers and backup emergency generators. The highest calculated cancer risk during operation would be 6.30 in one million<sup>12</sup>, which would also not exceed South Coast AQMD's CEQA significance threshold of 10 in one million.

#### South Coast AQMD Staff's Comments

##### *Air Dispersion Modeling*

6-2

According to the Draft SEIR, the Proposed Project includes operation of four stationary equipment or two emission source types: two backup emergency generators and two boilers. The stationary equipment will be operated at two different locations at the Proposed Project: the Central Utility Plant and the Clinics and Ambulatory Services Building. The Lead Agency performed project-specific air dispersion modeling using AERSCREEN and modeled emissions from two backup emergency generators and two boilers together as a single point source with the following parameters: 20-foot stack height, a 0.61-meter diameter stack, a velocity of 24.7 meters per second, and a temperature of 673 Kelvins.

<sup>5</sup> *Ibid.* Pages 3.2-21 to 3.2-22.

<sup>6</sup> *Ibid.* Pages 3.2-26 to 3.2-27.

<sup>7</sup> *Ibid.*

<sup>8</sup> *Ibid.* Page 3.2-23.

<sup>9</sup> *Ibid.* Pages 3.2-29 to 3.2-30.

<sup>10</sup> *Ibid.* Pages 3.2-31 to 3.2-34.

<sup>11</sup> South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk is based on the most current methodology recommended by the California Office of Environmental Health Hazard assessment.

<sup>12</sup> *Ibid.*

Lindsey Hashimoto

November 16, 2020

6-3

AERSCREEN is a U.S. Environmental Protection Agency-approved screening model of AERMOD and is designed to model single-source scenarios<sup>13</sup> or multiple emission sources with the same emission characteristics. The Proposed Project includes operation of four stationary equipment at two different locations. Depending on the emission characteristics, the stationary equipment at the Proposed Project represent different emission characteristics. Therefore, it is more appropriate to use AERMOD to model pollutant concentrations from these emission sources. Additionally, as discussed in the comment below, operation of the backup emergency generators and boilers at the Proposed Project requires permits from South Coast AQMD, unless exempted by South Coast AQMD Rule 219. South Coast AQMD uses the most recent version of AERMOD to conduct modeling analysis for reviewing permit applications<sup>14</sup>. Therefore, South Coast AQMD staff recommends that the Lead Agency use the most recent version of AERMOD (version 19191) to model the Proposed Project's operational stationary source emissions and identify the maximum concentration for the operational HRA in the Final SEIR. Alternatively, if the Lead Agency does not use AERMOD in the Final SEIR, it should provide reasons as substantial evidence in the record to support that it is more appropriate to use AERSCREEN to model pollutant concentrations from stationary sources during operation of the Proposed Project.

*Responsible Agency, South Coast AQMD's Permits, and Compliance with South Coast AQMD Rules and Regulations*

6-4

In the Draft SEIR, the Lead Agency identified South Coast AQMD as a Responsible Agency for the Proposed Project (CEQA Guidelines Section 15381) since implementation of the Proposed Project will require permits from South Coast AQMD<sup>15</sup>. However, at the time of the release of the Draft SEIR, South Coast AQMD has not received permit applications related to the Proposed Project. Since the Proposed Project is anticipated to include new, stationary source equipment such as backup emergency generators and boilers, the Proposed Project may be required to submit complete and timely permit applications to South Coast AQMD for such equipment. Therefore, it is recommended that the Lead Agency consult with South Coast AQMD's Engineering and Permitting staff to determine if any permits from South Coast AQMD will be required for operation of the backup emergency generators and boilers, and if compliance with applicable South Coast AQMD rules is required and should be discussed in the Air Quality Section of the Final SEIR.

6-5

It is important that the permits are fully and adequately evaluated in the Final SEIR as required under CEQA Guidelines Section 15096(b). It is also important to note that the assumptions used in the Air Quality Analysis in the Final SEIR will be used as the basis for evaluating the permits under CEQA and imposing permit conditions and limits. If there is any information in the permitting process suggesting that the Proposed Project would result in significant adverse air quality impacts not analyzed in the Final SEIR, or substantially more severe air quality impacts than those analyzed in the Final SEIR, the Lead Agency should commit to reevaluating the Proposed Project's air quality and health risks impacts through a CEQA process (CEQA

<sup>13</sup> United States Environmental Protection Agency (U.S. EPA). "Revisions to the Guideline on Air Quality Models: Enhancements to the AERMOD Dispersion Modeling System and Incorporation of Approaches to Address Ozone and Fine Particulate Matter". 82 Fed Reg. 5209 (January 2017).

<sup>14</sup>South Coast AQMD. *South Coast AQMD Modeling Guidance for AERMOD*. Accessed at: <http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance/submittal-requirements>.

<sup>15</sup> Draft SEIR. Executive Summary. Page ES-5.



Lindsey Hashimoto

November 16, 2020

6-5  
Cont'd { Guidelines Section 15162). Questions on permits and applicable South Coast AQMD rules can directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

6-6 { Conclusion  
Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final SEIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Air Quality Specialist, at [amullins@aqmd.gov](mailto:amullins@aqmd.gov), should you have any questions or wish to discuss the comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development &amp; Area Sources

LS:AM  
ORC201008-03  
Control Number



**Response to Letter 6: South Coast Air Quality Management District**

**6-1:** This comment is an introductory statement from South Coast Air Quality Management District (SCAQMD) and states SCAQMD's intention to provide guidance to be incorporated into the Final SEIR. UCI appreciates the commenter's review of the Draft SEIR. Responses to specific comments are provided below; no further response is required.

No changes to the Draft SEIR were made as a result of this comment.

**6-2:** This comment summarizes the SCAQMD staff's understanding to the project. This comment does not raise a specific concern with the adequacy of the Draft SEIR. Therefore, no further analysis is warranted.

No changes to the Draft SEIR were made as a result of this comment.

**6-3:** This comment summarizes the Draft SEIR's air dispersion modeling and health risk analysis for operational stationary sources and notes the SCAQMD's preference for the use of the AERMOD dispersion model instead of AERSCREEN for stationary source permits. It should be noted that the Draft SEIR conducted the stationary source dispersion modeling to analyze the project's impacts under CEQA. As noted in the Draft SEIR, AERSCREEN is a screening model based on the AERMOD dispersion model. AERSCREEN produces estimates of worst-case concentrations without the need for hourly meteorological data. According to the U.S. EPA Support Center for Regulatory Atmospheric Modeling (SCRAM) website, AERSCREEN is intended to produce concentration estimates that are equal to or greater than the estimates produced by AERMOD with a fully developed set of meteorological and terrain data. Therefore, the analysis within the Draft SEIR is conservative.

As noted above, U.S. EPA's AERSCREEN screening model was used in the Draft SEIR to be conservative and because the final location of the stationary equipment are subject to change and not currently known. The AERSCREEN model used in the Draft SEIR conservatively combined all of the stationary equipment into a single point source because AERSCREEN can only model one source. The method of combining all of the stationary equipment into a single point source provides worst case results by concentrating all of the emissions in a single location. AERSCREEN then reports the highest emissions concentration, which is what was used in the Draft SEIR.

However, in the interest of full disclosure and in order to respond to the comment, the stationary source emissions have been modeled with AERMOD for informational purposes. As the ultimate location of the stationary sources are subject to change, the worst-case location of the stationary source points in AERMOD were modeled. In order to be conservative, the modeling included two point sources, each with the emissions rate calculated in the Draft SEIR. It should be noted that two point sources were modeled in AERMOD because this model allows for multiple sources. Stationary sources would be located in both the Acute Hospital building and the Clinics and Ambulatory Services building. The multiple stationary sources were combined into one point source for each building because the stationary equipment would be grouped together in the same room.

The AERMOD modeling used surface and upper air meteorological data provided by the SCAQMD from the John Wayne International Airport Monitoring Station and was selected as being the most representative for meteorology based on proximity to the project site. Due to the size of the project site, receptors were modeled with a 20-meter grid spacing. In addition, National Elevation Dataset (NED) terrain data was imported into AERMOD for the project. The modeling and analysis was prepared in accordance with the SCAQMD Modeling Guidance for AERMOD.<sup>2</sup>

Based on the AERMOD outputs, the highest expected hourly average diesel PM<sub>10</sub> emission concentrations at the closest sensitive receptors from stationary sources would be 0.19 µg/m<sup>3</sup>. The highest expected annual average diesel PM<sub>10</sub> emission concentrations near sensitive receptors would be 0.0096 µg/m<sup>3</sup>. The highest calculated carcinogenic risk resulting from the project is 8.33 per million residents. The highest maximum chronic and acute hazard index associated with both DPM and acrolein emissions from the project would be 0.0019 and 0.076, respectively. Additionally, the Center for Child Health would be located adjacent to the proposed project. The highest expected hourly and annual average diesel PM<sub>10</sub> emission concentrations at this location would be 0.21 µg/m<sup>3</sup> and 0.0137 µg/m<sup>3</sup>, respectively. The highest calculated carcinogenic risk resulting from the project is 0.85 in one million for worker exposure. The highest maximum chronic and acute hazard index associated with both DPM and acrolein emissions from the project would be 0.0028 and 0.084, respectively. As noted above, these risk levels are based on conservative emissions rates and worst-case source and receptor locations.

The health risk computation performed to determine the risk of developing an excess cancer risk was calculated using age sensitivity factors (exposure starting at the third trimester) and 95<sup>th</sup> percentile breathing rates using CARB's Risk Assessment Stand Alone Tool. The chronic and carcinogenic health risk calculations are based on the standardized equations contained in the U.S. EPA *Human Health Evaluation Manual* (1991) and the OEHHA *Guidance Manual* (2015). Risk levels would not exceed SCAQMD's 10 in one million threshold for cancer risk or the 1.0 chronic and acute hazard threshold.

No changes to the Draft SEIR were made as a result of this comment.

- 6-4 The comment states the proposed Project may be required to submit complete and timely permit applications to South Coast AQMD for such equipment. UCI concurs with this comment. Pending approval by the UC Regents, applicable South Coast AQMD permits, if required, will be submitted prior to construction once the final project design has been finalized and construction schedules have been determined.

No changes to the Draft SEIR were made as a result of this comment.

- 6-5 The comment states that the permits must be fully and adequately evaluated in the Final SEIR. Please see Response 6-3 above. The project was re-evaluated using the AERMOD modeling methodology as requested. No changes to the conclusions of the Draft SEIR were identified.

No changes to the Draft SEIR were made as a result of this comment.

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<sup>2</sup> South Coast Air Quality Management District, *SCAQMD Modeling Guidance for AERMOD*, [www.aqmd.gov/home/air-quality/air-quality-data-studies/meteorological-data/modeling-guidance](http://www.aqmd.gov/home/air-quality/air-quality-data-studies/meteorological-data/modeling-guidance), accessed February 21, 2020.

- 6-6:** The SCAQMD requests written responses to their comment letter and identifies CEQA Guidelines Section 15088(b), which requires lead agencies to provide written responses to public agency comments. UCI intends to fully comply with the requirements of the California Public Resources Code and CEQA Guidelines Section 15088(b) as requested in the comment.

No changes to the Draft SEIR were made as a result of this comment.

## Letter 7: Irvine Ranch Water District



November 12, 2020

Ms. Lindsey Hashimoto, Senior Planner  
Office of Physical and Environmental Planning  
University of California, Irvine  
4199 Campus Drive, Suite 380  
Irvine, CA 92697-2325

### Re: NOA/Draft SEIR-UCI Irvine Campus Medical Complex

Dear Ms. Hashimoto:

7-1

Irvine Ranch Water District (IRWD) has received the University of California, Irvine's (UCI) Notice of Availability (NOA) for a draft Subsequent Environmental Impact Report (SEIR) for the proposed UCI Irvine Campus Medical Complex Project. IRWD has reviewed the NOA/draft SEIR and offers the following comments.

The draft SEIR indicates that the proposed project would allow for the development of a UCI Health integrated medical campus providing inpatient, ambulatory, and emergency care services. IRWD understands that the proposed project includes an approximately 350,000 gross-square-foot (GSF) hospital, an approximately 200,000 GSF ambulatory care center, an approximately 25,000 GSF central utility plant, and a parking structure with 1,400 spaces.

As stated in the draft SEIR, the 2007 UCI Long Range Development Plan (LRDP) provides a comprehensive framework for development on the UCI campus. The project site, as noted in the draft SEIR, has a LRDP use of Mixed Use - Commercial. The LRDP Mixed Use - Commercial land use designation currently does not include inpatient clinical uses so IRWD noted that through this environmental process, the draft SEIR analyzed a third amendment to the LRDP to include inpatient clinical uses as an allowable use under Mixed Use - Commercial.

7-2

IRWD has included the overall demands associated with the 2007 UCI LRDP in IRWD's water demands and sewer flow projections. Similar with other IRWD comment letters about UGI projects, as projects in the LRDP are developed IRWD will require UGI to complete studies analyzing the impact of the proposed projects on IRWD-owned facilities (potable, recycled, and sewer systems). These studies will verify if any additional off-site improvements to IRWD's existing systems are needed. IRWD acknowledges that IRWD's Development Service and Planning Divisions have worked with UCI's Planning Division to develop the necessary Sub-Area Master Plan (SAMP) analysis for this project. For further questions about the LRDP studies, SAMP addendums, or in the event there are any changes to the proposed project, please contact Eric Akiyoshi, Engineering Manager - Planning at (949) 453-5552.

Ms. Lindsey Hashimoto  
 NOA/Draft SEIR - UCI Irvine Campus Medical Complex  
 Page2

7-3 The draft SEIR correctly indicates that the proposed project site is within IRWD's service area. Page 2-23 of the draft SEIR indicates that potable water would be connected through two feeds, an existing 12-inch pipeline located in Jamboree Road and a 12-inch pipeline connected to Campus Drive. A 6-inch recycled water pipeline would connect to an existing IRWD recycled water pipeline in Campus Drive. IRWD noted that the proposed project includes the installation of new recycled water pipelines to support recycled water uses on-site. Per the draft SEIR recycled water may be used for landscape irrigation, cooling tower water, as well as ambulatory clinic toilets use outside of surgical departments. The proposed project would also involve the extension of a 12-inch sewer main from an existing IRWD sewer pipeline in Campus Drive that would serve the proposed Acute Care Hospital, the proposed Ambulatory Care Center, and the proposed Central Utility Plant. Discharge from the sewer system would be directed to Orange County Sanitation District's treatment plants via IRWD's existing sewer pipeline.

7-4 As noted in the draft SEIR, the proposed project includes a Central Utility Plant, which would provide thermal energy service and other utility services to the project including chilled water, high temperature water, back-up power generation and services to the building. The draft SEIR provides a good discussion of recycled water demand or uses. Since recycled water may be available to the proposed project site, IRWD recommends that UCI continue to consult with and contact Mark Tettemer, Recycled Water & Development Manager at (949) 453-5592 to review the project's final design to ensure that recycled water is used to the maximum extent for irrigation, cooling tower and other approved uses.

IRWD appreciates the opportunity to review and comment on the NOA/draft SEIR. If you have any questions or if you require additional information, please contact me at (949) 453-5325 or Ms. Jo Ann Corey, Environmental Compliance Specialist at (949) 453-5326.

Sincerely,



Fiona M. Sanchez  
 Director of Water Resources

cc: Eric Akiyoshi, IRWD  
 Mark Tettemer, IRWD  
 Jo Ann Corey, IRWD

**Response to Letter 7: Irvine Ranch Water District**

- 7-1:** This comment summarizes the Irvine Ranch Water District (IRWD) review of the Project and summarizes the proposed square footage and that the SEIR analyzed a third amendment to the LRDP to include inpatient clinical uses as an allowable use under Mixed Use - Commercial.

The comments on the Draft SEIR are not at variance with the findings of the document or request additional information or clarification. No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

- 7-2:** This comment summarizes the overall IRWD review process and studies for projects in the LRDP, and if future improvements would be needed, it provides contact information.

The comments on the Draft SEIR are not at variance with the findings of the document or request additional information or clarification. No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

- 7- 3:** IRWD summarizes the SEIR and information that discusses potable and recycled water use.

The comments on the Draft SEIR are not at variance with the findings of the document or request additional information or clarification. No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

- 7-4:** IRWD summarizes the SEIR and information that discusses the Central Utility Plant noting that a good discussion is provided. IRWD provides contact information and recommends UCI contact Recycled Water & Development Manager for consultation related to water use.

The comments on the Draft SEIR are not at variance with the findings of the document or request additional information or clarification. No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

Letter 8: Sea and Sage Audubon



Sea and Sage Audubon

P.O. BOX 5447, IRVINE, CA 92616-5447

(949) 261-7963

November 16, 2020

Lindsey Hashimoto, Senior Planner
University of California, Irvine
Campus Physical and Environmental Planning
4199 Campus Drive, Suite 380
Irvine, California 92697-2325
949-824-8692 hashimol@uci.edu

Subject: Irvine Campus Medical Complex Draft SEIR Comments

Delivered Via Email

Dear Ms. Hashimoto,

Sea and Sage Audubon Society appreciates the opportunity to provide comments and questions regarding the Irvine Campus Medical Complex Draft Subsequent Environmental Impact Report SCH 20200029099. Sea and Sage Audubon is an Orange County chapter of the National Audubon Society with nearly 3,000 local members dedicated to the protection and appreciation of birds and their habitats. Our offices are located at the San Joaquin Wildlife Sanctuary and we are essentially neighbors of University of California, Irvine (UCI). We share the same wetland and wildlife habitats (separated only by Campus Drive) that would be impacted by this project.

8-1 While Sea and Sage Audubon appreciates the efforts put forth in the Draft Subsequent Environmental Impact Report (DSEIR) we find the analysis of potential impacts to the environment, particularly as biological impacts, to be significantly inadequate and/or absent. We list some of the inadequacies below. We believe that a much more detailed and through investigation into the impacts on biological resources must be completed and that a revised DSEIR is required in order to adequately analyze the project and inform the public of the potential and real impacts of the project

8-2 As we mention below the DSEIR only briefly mentions the presence of numerous sensitive species and gives little or no acknowledgement of the impact of the project. There is no investigation and no discussion about the ecological relationship between the upland bluffs and the marsh. No recognition of secondary or accumulative impacts. Instead biological surveys were minimal and incomplete, and the analyzation of impacts is almost absent. The DSEIR relies too heavily on the fact that UCI is enrolled in the NCCP and presumes that therefore it does not have to identify or determine whether to impacts are adequately mitigated. Species like California Gnatcatcher may have increased in numbers in the proposed project area, habitat restoration was initiated after the approval of the NCCP and has likely drawn wildlife to the area, something not considered in the NCCP. Little was known about western pond turtle use of the marsh in the 1990s. White-tailed Kites, a California Fully Protected Species that will be impacted by this project, are poorly studied in the DSEIR and are not a covered species in the NCCP.



8-2  
cont'd | UCI teaches, as part of its curriculum, environmental sustainability, and responsibility, it promotes and advocates for stewardship of open spaces and wildlife. The DSEIR should not simply gloss over impacts and considerations of how to avoid or minimize those impacts just because they are a participant in the NCCP.

**Comments to Specific Sections of the DSEIR**

8-3 | Pg ES-3  
 "The 2007 LRDP provides the comprehensive framework for the physical development of the UCI campus and is the primary planning document for the campus; no other local land use plans apply to the University."  
 UCI 2007 Long Range Development Plan Final EIR page 4.3-19 states:  
 "The North Campus Sub-Area is adjacent to the SJFMR, which is managed jointly by UCI and UCNRS. The SJFMR is not included in the UCI LRDP. The 1989 Memorandum of Understanding between UCI and UCNRS identified planning parameters for development of the North Campus Sub-Area with the goal of limiting impacts on habitat values and research within the SJFMR. The planning parameters included the establishment of a 150-foot-wide buffer zone between North Campus Sub-Area and the SJFMR. The buffer zone would be restricted from building development and would contain native plantings."  
 The MOU should be referenced in the DSEIR.

8-4 | Pg 2-16  
 "Pedestrian and Bicycle Access"  
 UCI currently provides access control for the SJFMR using fencing and locked gates. Unrestricted public access will have various negative impacts on habitat values. This DSEIR must include provision for controlling access. Because access control mechanisms can have negative impacts, the design (and alternatives) should be defined in the DSEIR.

8-5 | Pg 2-18  
 "...a pedestrian and bicycle trail at the project/buffer zone interface..."  
 Putting a trail (and the required access control mechanisms) within the buffer zone will violate the intent of the buffer zone. The trail should be wholly within the project area and the design should be defined in the DSEIR.

8-6 | Pg 2-23  
Natural Gas  
 "The University of California restricts the use of natural gas for space and water heating for new buildings except for acute care hospitals."  
 The above statement seems to be a misinterpretation of UC Policy on Sustainable Practices III. A.2 and 3.  
 "2. Acute care/hospital facilities and medical office buildings shall be designed, constructed, and commissioned to outperform ASHRAE 90.1 - 2010 by at least 30% or meet the whole-building energy performance targets listed in Table 2 in Section V.A.3."



8-6  
cont'd | Paragraph 2 requires that “acute care/hospital facilities shall be designed...to outperform” certain standards”

“3. No new building or major renovation that is approved after June 30, 2019, shall use onsite fossil fuel combustion (e.g., natural gas) for space and water heating (except those projects connected to an existing campus central thermal infrastructure).”

Paragraph 3 requires no new buildings use onsite fossil fuel combustion, even if the design can meet or exceed the specified standards.

Natural gas should not be used in a new building. It is a greenhouse gas and use of it should be eliminated in new buildings.

**October 25, 2020 Los Angeles Times Letter to the Editor**

**To the editor:** The American Institute of Architects California, an association of 11,000 architects in California, wholeheartedly agrees that now is the time to insist that future buildings are designed to be more energy efficient and to be ready for renewable energy sources. (“[This is easy — new buildings should be designed for a fossil fuel-free future](#),” editorial, Oct. 19)

Our group is taking several steps to get there. We are actively supporting the adoption of an all-electric energy code for residential and commercial buildings. We are actively supporting efforts by local governments to require new buildings in their jurisdictions to be all-electric before it becomes a state mandate. We believe the move to all-electric buildings must begin right away.

Indoor and outdoor air pollution disproportionately affect disadvantaged communities and communities of color, and unfortunately, California continues to lead the nation in air pollution. These structural inequities must be addressed with urgency.

All-electric buildings of all types and sizes are already being designed today. They use efficient electric appliances that run on California’s rapidly expanding clean renewable energy supply supplemented with rooftop or community solar.

We encourage the city of Los Angeles to join other communities in California that have shown leadership in supporting a truly equitable and sustainable future by requiring buildings to be all-electric.

*Debra Gerod, Los Angeles*

*The writer, an architect, is president of the American Institute of Architects California.*

8-7 | Pg 2-23

“As a part of the Project, a waiver would be submitted to the UC Regents to allow for the use of natural gas for the Central Utility Plant and Ambulatory Care Center.”

If a waiver is to be requested, the analysis and rationale for the waiver should be included in this DSEIR.

8-8

Pg 3.1-2

“Lighting”

It should be possible to provide a graphic model available online of the potential Light Spill so that the effects can be judged objectively.

Outside lighting should be controlled by motion sensors to further reduce Light Spill and the negative effects on migrating birds travelling at night.

8-9

8-10	<p style="text-align: center;"><u>“Glare”</u></p> <p>It should be possible to provide a graphic model available online of the potential Glare so that the effects can be judged objectively.</p> <p>Another effect that that is caused by window glass is bird strikes. Bird strikes are one of the major causes of death for birds. The appropriate choice of glass material or other preventative measures will allow flying birds to perceive the glass so that they can avoid flying into it.</p>
8-11	<p>Pg 3.3-7</p> <p><u>General Biological resources Surveys</u></p> <p>The surveys list did not detect specific animal species known to be present in the project area or adequately evaluate the habitat known to support these species. Multiple “Coastal California Gnatcatcher” individuals are routinely detected year-round. Multiple Least Bell’s Vireo individuals are routinely detected during nesting season. Multiple White-tailed Kites are detected year-round. Multiple Western pond turtles have been detected nesting and estivating during appropriate times of the year.</p>
8-12	<p>Pg 3.3-11</p> <p>Figure 3.3-2</p> <p>This figure ignores the documented presence of White-tailed Kite in the project area (see eBird.org for a species map and zoom in to the project area). The “Vegetation Community” classified as Disturbed Habitat is frequently used for White-tailed Kite foraging. The White-tailed Kite use the Southern Arroyo Willow Riparian Forest for nesting annually and require nearby foraging area to provide ample food for their young. The kites also use the SJFMR as a winter roost. Thus the “Disturbed Habitat” is a necessary part of the habitat requirement for this species.</p>
8-13	<p>Pg 3.3-14 through 3.3-19</p> <p>Western Pond Turtle</p> <p>The statements about the Western Pond Turtle use of habitat are demonstrably false.</p> <p>According to an Master Thesis completed in 2016 by California State University, Long Beach Barry Nerhus, western pond turtles occur throughout the marsh and nest in the dry uplands/mesa at or near the proposed hospital location. Whether or not the hospital directly takes breeding habitat may be unclear, but the hospital and ensuing foot trail will undoubtedly impede and impact western pond turtle movements</p> <p>Nerhus, B.S., 2016. The Movements, Habitat Use and Population Assessment of Western Pond Turtles (<i>Actinemys moarmorata</i>) in a Southern California Seasonal Wetland. Master Thesis. California State University, Long Beach. (ProQuest # 10105256)</p> <p>This species uses the project area for nesting and estivation as documented in a thesis. The proposed mitigation measures will not detect the species or prevent “take”.</p> <p>The connection to the bike/pedestrian trail system may also cause harm to this species by possibly interfering with the movement between the pond area of SJFMR and the area required for nesting or estivation. The lack of details about the design elements of the trail in the project area prevent a</p>

8-13  
cont'd | complete evaluation of this risk. There is also no consideration for the cumulative impact on this species if the trail connections are completed to the main campus.

| Pg 3.10-8

| “UC Natural Reserve System Consultation”

8-14

| Under current conditions, the fencing and locked gates along Jamboree and Campus provide access control for the marsh. Public access is allowed only under controlled and supervised conditions. The proposed design does not include any elements to provide access control after the completion of construction. These design elements should be included in the DSEIR so that any impacts can be fully evaluated.

| In several places throughout the DSEIR, the sentence “The Project would connect to a campus-wide network of bike/pedestrian trail system.” Is used. However, there are no specific design elements described for the trail, so the impacts of the trail system cannot be evaluated. The Project would only provide a small section of the trail, so any potential cumulative impacts cannot be evaluated.

Darrell Wilson

Conservation Committee, Special Projects

## Response to Letter 8: Sea and Sage Audubon Society

**8-1:** As discussed at our meeting on December 4, 2020, UCI does not concur with this comment that the analysis of biological impacts is significantly inadequate or absent. The Project Site was evaluated for potential impacts on biological resources in the 2007 LRDP EIR. The 2007 LRDP EIR found that potential impacts on biological resources were less than significant with the incorporation of mitigation measures. The proposed Project is consistent with the 2007 LRDP development site location and development intensity, and the SEIR incorporates the applicable biological mitigation measures from the 2007 LRDP EIR.

Site specific biological surveys conducted by qualified biologists were prepared for the Proposed Project, covering the Project Site which includes both the Development Area and 150-foot Buffer Area. As noted on page 3.3-7 of the SEIR, the biologists conducted two pedestrian surveys of the site (April 11, 2019 and August 20, 2020). The surveys were conducted to document existing site conditions and biological resources, and to evaluate habitat with the potential to support various special-status plant and wildlife resources, including jurisdictional aquatic or other hydrological features, if present. Prior to conducting fieldwork, literature reviews and database searches were conducted to identify special-status plant and wildlife species, vegetation communities, and other biological resources that have been previously documented within, near, and/or have the potential to occur within the survey area. A supplemental rare-plant survey was conducted for the Project in September 2020 (included as Appendix C-3 to the SEIR). No rare plant species were observed within the survey area during the survey. The SEIR evaluated potential impacts on biological resources and determined that impacts are reduced to less than significant with the implementation of mitigation measures. UCI did incorporate changes to Mitigation Measure BIO-2 to include more specific language regarding the specific steps that need be taken if Western Pond turtle or western mastiff bat are detected during preconstruction surveys. Responses to the comments raised in this letter are provided in the responses below.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**8-2:** UCI does not agree that the biological surveys were minimal and incomplete. Please see Response 8-1. As shown in Figure 3.3-1 and Table 3.3-1, 15.38 acres of the 16.86-acre surveyed area (91%) are identified as disturbed, ornamental, or developed habitat. The coastal sage scrub habitat located within the 150-foot Marsh Buffer Area is where no structural development is proposed, including no bike or pedestrian trails. Further, there are 322 acres of existing open space on and surrounding the ICMC site, including the 150-foot Buffer Area, UCI NCCP Habitat Reserve Areas including the former landfill site, UC San Joaquin Marsh Reserve, and Irvine Ranch Water District marsh corner parcel. This area does not include approximately 18 acres that is identified for future development on the North Campus within the 2007 LRDP. The ICMC Project will permanently remove approximately eight acres of disturbed habitat within the Project Development Area, which is approximately two percent of the existing open space, leaving approximately 98 percent of open space post-Project. Please see Response 8-11 regarding impacts to California gnatcatcher, Western Pond turtle, and White-tailed kites.

UCI does not agree that the Draft SEIR relies too heavily on the fact that UCI is enrolled in the NCCP. As noted in the SEIR (page 3.3-22), UCI has been a participating landowner in the Orange County NCCP/HCP program since 1996. The NCCP is a mechanism that can provide an early planning framework for proposed development Projects within the planning area in order to avoid, minimize, and compensate for Project impacts to wildlife. The purpose of natural community conservation planning is to sustain and restore those species and their habitat identified by the Department of Fish and Wildlife which are necessary to maintain the continued viability of those biological communities impacted by growth and development.

Participation in the Orange County NCCP/HCP program by UCI is how long-term impacts on biological resources are addressed both as a result of development and other environmental factors (including climate change). As stated on page II-3 of the Orange County Subregional NCCP Plan, “[O]ne purpose of this subregional planning program is to carry out a conservation planning effort on a large-scale, subregional level with sufficient geographic scope and habitat/species diversity to enable cumulative impacts on CSS habitat and related species, reserve design and connectivity needs to be addressed and satisfied in a manner consistent with the NCCP Conservation Guidelines.” The NCCP is not a static plan, but rather is informed by monitoring and adaptive management. Through the NCCP’s adaptive management approach, reserve areas are monitored to guide management decisions, allowing management plans to adapt and respond to sudden or progressive environmental changes. UCI scientists serve a key role in NCCP science and monitoring programs.

UCI has preserved and managed designated open space areas throughout the campus as a part of the 37,000-acre multi-habitat subregional NCCP reserve system. The development for the North Campus was considered in the 2007 LRDP, which took into account UCI’s enrollment in the NCCP by preserving and managing significant areas of upland habitat to benefit multiple species on the Main campus, North campus, and off-campus habitat areas within the Orange County Coastal/Central NCCP Subregion, as an integrated and collaborative approach to mitigate UCI development under the LRDP. As a participating NCCP landowner, UCI has permanently preserved and actively managed a significant land area for habitat and species protection in collaboration with other subregional landowners and state and federal wildlife agencies. This includes preservation of 135 acres of primarily upland habitat types on the Main Campus and North Campus that provide important natural area linkages to campus and subregional open space systems, establishing much-needed habitat connectivity to benefit multiple species and habitat types. Consistent with the adaptive management approach described in the NCCP, participating landowners work in partnership with State and Federal Wildlife agencies to enhance, monitor, and actively manage their Reserve lands. As a result, UCI has implemented a significant program of habitat establishment and enhancement throughout UCI NCCP Reserve areas under the LRDP. This includes investment in extensive upland habitat establishment, enhancement, and management in the UCI West Campus to accommodate a key regional habitat linkage providing nesting and foraging habitat for multiple bird and other species along the Bonita Creek/SR-73 corridor, supporting habitat connectivity from the San Joaquin Hills to the UCI North Campus NCCP Reserve area and UCI San Diego Creek NCCP Reserve area. In addition, UCI has implemented extensive upland habitat establishment, restoration, and management in the South Campus NCCP Reserve area, providing extensive nesting and foraging habitat for multiple bird and other species,

preserving critical linkages to NCCP habitat areas south of the campus to the Bommer Canyon, Shady Canyon, and Crystal Cove State Park NCCP Reserve areas. Finally, UCI established a significant NCCP Reserve area on the North Campus to provide upland habitat in support of species using the San Joaquin Marsh and surrounding areas. The North Campus NCCP Reserve area, which includes the UCI landfill site, provides habitat connectivity to the San Joaquin Marsh, North Campus Biological Buffer Zone, and adjacent areas, providing important North Campus upland open space for species foraging and other uses. UCI is continuing to pursue habitat establishment and restoration within the UCI NCCP Reserve areas, including the North Campus NCCP Reserve area.

The Project Site is biologically linked to the Preserve Area through existing coastal sage scrub and other habitat types in the 150-foot development Buffer Area that extends between the two areas. The Project Site is not located within the Reserve System or identified special linkage areas. The development for the North Campus was considered in the 2007 LRDP which was included within the NCCP at that time, and the proposed Project is consistent with the development intensity contemplated in the 2007 LRDP. The NCCP fully analyzed and mitigated for species and habitat impacts in the 1996 NCCP/HCP for County of Orange Central & Coastal Subregion Joint EIR/EIS (Joint EIR/EIS), and UCI is bound to the implementation of the plan by virtue of being a signatory of the Implementation Agreement. Through the Implementing Agreement with the U.S. Fish and Wildlife Service, the California Department of Fish and Wildlife, and the other participating landowners, the Regents of the University of California have dedicated 135 acres to the NCCP/HCP Reserve System.<sup>3</sup>

As noted on page 3.3-18 of the SEIR, for participating landowners, development activities and uses that are addressed by the Orange County NCCP/HCP are considered fully mitigated under the Natural Community Conservation Planning Act (NCCP Act), FESA, and CESA for impacts to habitats occupied by listed and other species “identified” by the Orange County NCCP/HCP and its associated Implementing Agreement. Therefore, the proposed Project is not required to implement additional mitigation for impacts to “identified” species and their habitat (i.e., coastal California gnatcatcher). The purpose of the Orange County NCCP/HCP, and NCCPs in general, is to encourage development in urban and disturbed areas with little to no sensitive species and provide mitigation in the reserve areas established to protect sensitive species. Mitigation in the reserve areas helps to create large blocks of contiguous habitat that will provide long term habitat viability and promote genetic exchange among the protected species. This includes preservation and management of significant UCI open space adjacent to the San Joaquin Marsh as a part of the NCCP Reserve to provide upland habitat to benefit San Joaquin Marsh habitat and species. Therefore, reliance on participation in the NCCP in the SEIR analysis is appropriate.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

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<sup>3</sup> The NCCP, Joint EIR/EIS, and Implementation Agreement are hereby incorporated by reference and can be found at <https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans/Orange-Coastal> or <https://cpep.uci.edu/environmental/review.php>. Additionally, copies are available to the public at University of California, Irvine, Physical and Environmental Planning, 4199 Campus Drive, Suite 380, Irvine, California 92697-2325.

**8-3:** The Draft SEIR does reference the 1989 MOU. As described in the ICMC SEIR (page 3.3-5), the 1989 MOU pertained to the 1989 LRDP. During the update of the 2007 LRDP, the 1989 MOU was replaced by specific mitigation measures in the 2007 LRDP EIR to protect the UC San Joaquin Marsh, including the establishment of the 150-foot biological Buffer Area. The MOU is addressed in the 2007 LRDP EIR, which has been incorporated by reference, but is no longer applicable.

There are no permanent building improvements proposed for the 150-Buffer Area, including bike or pedestrian trails. The Final SEIR has been revised to clarify that no trails will be located within the 150-foot Buffer Area. Improvements within the Buffer Area will be limited to water quality improvements to support UC San Joaquin Marsh Reserve habitat management, native landscaping to support habitat restoration and enhancement to benefit the Marsh, and temporary grading. These improvements will be planned, implemented, and managed in close consultation with UCI Nature biologists that oversee the management of the Marsh.

**8-4:** The proposed Project will not result in unrestricted public access to the Marsh nor result in other changes to public access to the Marsh area. Access to the Marsh will remain restricted by the University to protect the research, teaching, and habitat management mission of the Marsh. Pedestrian or bicycle trails built as a part of the Project will be located within the Project Development Area and outside of the 150-foot Buffer Area and the Marsh. Barriers would be installed to prevent public access into the 150-foot Buffer Area and Marsh in order to preserve Marsh resources.

**8-5:** The commenter is referred to response 8-4 above. Pedestrian or bicycle trails built as a part of the Project will be located within the Project Development Area and outside of the 150-foot Buffer Area and the Marsh. Barriers would be installed to prevent public access into the 150-foot Buffer Area and Marsh in order to preserve Marsh resources.

**8-6:** The Project central utility plant will be all-electric, including electric heat-recovery chillers for all building space and water heating, electric humidifiers, and electric steam generators for sterilization. No natural gas will be utilized by the central utility plant in support of UCI climate protection goals and the UC Sustainability Policy. Page 2-23 of the Final SEIR will be revised to clarify that no natural gas will be used by the central utility plant.

**8-7:** UCI recognizes and appreciates this comment. However, the comment is unrelated to the proposed Project and not at variance with the findings in the Draft SEIR. Please see Response 8-6 above. No further response is required.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**8-8:** Please see Response 8-6. Page 2-23 of the Final SEIR will be revised to clarify that no natural gas will be used by the central utility plant.

**8-9:** Potential impacts from daytime glare and nighttime light are discussed in Chapter 3-1 of the Draft SEIR. This section of the SEIR incorporates mitigation measures from the 2007 LRDP SEIR that applies to all development consistent with the buildout of the 2007 LRDP. Nighttime lighting is addressed on page 3.1-4 of the Draft SEIR and mitigation is proposed to address nighttime lighting in Mitigation Measure AES-2. As noted in the Draft SEIR:

“[I]mplementation of MM AES-2 would ensure that the lighting plan for the Project was reviewed prior to construction to ensure that building lights, spotlights, floodlights, reflectors, and other means of illumination are shielded or equipped with special lenses in such a manner as to prevent any glare or direct illumination on any public street or other property including the San Joaquin Marsh Reserve.

Therefore, potential impacts associated with nighttime lighting are less than significant. Similarly, daytime glare was also discussed on page 3.1-4 of the Draft SEIR. Mitigation measure AES-1 is proposed to minimize daytime glare. The Draft SEIR concludes, “Implementation of MM AES-1 would ensure that building plans were reviewed prior to construction to ensure all exterior windows and glass used on building surfaces would be non-reflective or treated with a non-reflective coating to avoid glare impacts from the sun.”

Graphic models of the nighttime lighting and glare are not available because the final building designs are still in progress and the locations of specific exterior lighting packages have not been finalized. As described more fully in Response 8-10, the project will incorporate bird-safe design features as part of the exterior architecture of the buildings. This is in addition to the requirements of MM AES-1 specifying the use of non-reflective exterior surfaces and low reflectance glass.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**8-10:** The commenter is referred to response 8-9 above. UCI will continue to work in close consultation with UCI Nature biologists that manage the UC San Joaquin Marsh Reserve regarding project planning, design, and operations elements to protect wildlife and support the University’s teaching, research, and habitat management mission of the UC San Joaquin Marsh Reserve. In addition to mitigation measures AES-1 and AES-2, architectural and operational features are currently being investigated, in consultation with UCI Nature biologists, as part of the final architectural design of the proposed buildings to further reduce the risk of bird strikes. UCI is will incorporate a range of bird protection measures in the ICMC project design. This includes bird-safe glass applications and other bird-safe exterior design features:

1. Avoiding tall expanses of reflective or transparent glass in the first 60 feet of the building by breaking-up glass areas with sections of fritted glass and spandrel units, particularly in areas facing open space.
2. Requiring all building glass to be low reflectivity (less than 25% reflectivity).
3. Limiting the amount of clear or reflective glass on ground level stories, especially in areas adjacent to landscaping, through the use of fritted panels, shadowbox units, and shading devices.
4. Incorporating shading devices around the buildings to reduce massing of glass.
5. Incorporating a mixture of vision glass, spandrel panels, and fritted glass.
6. Mitigating the risk of sky reflections into glass through sun shading devices, spandrel glass, metal panel and frit patterns.
7. Limiting the use of tall landscaping in front of glass and avoids green roofs and water features near any facades.
8. Maintaining open space connections through the ICMC campus to prevent funneling of open space toward a building facade.



9. Avoiding the use of glass skyways or freestanding glass walls.
10. Avoiding the use of up-lighting or spot lighting.
11. Requiring that all lighting fixtures will be fully shielded.
12. Utilizing interior blinds to mitigate nighttime light pollution from the façade. Where feasible depending on use, building lights will be turned off at night. No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**8-11:** UCI does not agree that the Project biological surveys did not detect specific animal species known to be present in the Project area or adequately evaluate the habitat known to support these species. Please see Response 8-1. Coastal California Gnatcatcher and Least Bell's Vireo were detected during Project surveys and are mentioned on page 3.3-14. Western Pond turtle was not detected because aquatic habitat was outside of the survey area, most of the on-site habitat is highly disturbed dense-growing vegetation, and this species is not usually incidentally detected in uplands away from aquatic areas; however, this species is also discussed on page 3.3-14. White-tailed kites were not detected during surveying that occurred on April 11, 2019 and August 20, 2020, nor during a supplemental survey that occurred on October 16, 2020. Although not detected during project surveys, UCI does not dispute that the species occurs at the UC San Joaquin Marsh Reserve. But because the species was not detected during multiple field surveys, it cannot be included in the list of observed species. The CNDDDB record search indicates that the nearest reported nest occurrence for the White-tailed Kite is approximately 0.4 miles from the Project Site where suitable nesting habitat occurs within the UC San Joaquin Marsh Reserve. This species nests in trees that are either isolated or that are part of riparian or woodland habitat adjacent to open space and does not nest on the ground or in dense mustard vegetation that are characteristic of the Project Site. Because of this, there is no suitable nesting habitat in the Project Development Area and therefore White-tailed Kites would not use it for nesting. The Arroyo Willow Riparian Forest habitat area at the southern edge of the 150-foot Buffer Area that could potentially allow for nesting habitat is not a part of the Project Development Area and will not be directly impacted by the Project.

UCI acknowledges the information provided by the commenter that a pair of White-tailed Kites nest in the UC San Joaquin Marsh and use North Campus land areas for foraging, which is consistent with information provided in the Biological Resources Report for the SEIR that a pair of White-tailed Kite have been recorded nesting in the Marsh approximately 0.4 miles from the Project Site, and the analysis provided in the 2007 LRDP EIR that White-tailed Kites and other raptors use North Campus land areas for foraging. As described in Response 8-2, the Project Development Area represents a small percentage of overall North Campus open space and consists of a UCI maintenance yard and dense stands of black mustard, which likely provide lower value foraging area than other North Campus open space areas that contain more open vegetation cover and are more isolated from active human use. UCI has set aside significant areas of North Campus open space through the LRDP to provide habitat to support species using the Marsh. The University welcomes the opportunity to continue to work in consultation with Sea and Sage Audubon in guiding and implementing UCI's habitat management programs for these dedicated open spaces to continue to benefit White-tailed Kite and other species.

While White-tailed Kites do not nest onsite, there is potential foraging habitat on the Project Site. However, Mitigation Measure BIO-2 has been revised in the Final SEIR to include the White-tailed

Kite in the list of sensitive species that require focused protocol surveys prior to construction. Mitigation Measure BIO-4 requires a pre-construction nesting bird survey for raptors (including White-tailed Kite) and other avian species. In the event that an active nest is found, a nest buffer up to 500 feet shall be established around such active nests. No construction within the buffer shall be allowed until a qualified biologist has determined that the nest(s) is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest) or that it is safe to resume certain construction activities. Mitigation BIO-4 has been revised in the Final SEIR to state that if additional special-status species not covered by the NCCP/HCP are identified at the time of construction, a qualified biologist shall coordinate with the California Department of Fish and Wildlife (CDFW) and/or U.S. Fish and Wildlife Service (USFWS), as applicable, to determine measures to avoid and minimize impacts.

Should preconstruction surveys find that White-tailed Kites are present on the site or are nesting within 500 feet of the site, UCI will consult with CDFW as needed to determine appropriate avoidance and minimization actions. UCI has identified Reserve lands that can be used for mitigation if required by CDFW.

**8-12:** Figure 3.3-2 of the SEIR is of CNDDDB records and does not include eBird records. eBird records are not practical to include as it is an application used by bird watchers to report bird sightings but does not require specification of the geographic location, such as spatial coordinates, that a bird was observed. Furthermore, as any person can post to the eBird site, there is no way to confirm the veracity of the information or the qualifications of people posting to the site, and as such it is not considered substantial evidence and a reliable source of information for the SEIR. (See *Bowman v City of Berkeley* (2004) 122 Cal.App.4th 572, 583 (fact-based comments must be supported by evidence of factual foundation and observers' qualification to be substantial evidence; non-expert opinion is not substantial evidence for CEQA.) Further, review of eBird records suggests that White-tailed Kites are commonly observed in the adjacent UC San Joaquin Marsh Reserve, not on the project site, but only a handful of sightings in eBird include any comments/details about the sightings. Of the few observations that do include comments, none indicate where a nest is present and most either indicate kite presence over the ponds or simply state what time the birds were observed. Nearly all of the eBird records have no comments and therefore there is no way to know exactly where any kites were observed. There are no eBird records that indicate that kites are nesting closer than the nest record in the CNDDDB located approximately 0.4 miles from the project site survey area. Therefore, the nest data in the CNDDDB is the most accurate for use on a map for the SEIR, as it states a specific location. It should be noted that the CDFW was provided with the SEIR and technical appendices during the public review period for the SEIR and all measures they suggested have been adopted.

While White-tailed Kites do not nest on the Project Site and the Development Area does not contain nesting habitat, UCI recognizes Sea and Sage Audubon Society's comment that kites may forage over the currently undeveloped portion of the Development Area (approximately eight acres) and furthermore that a small amount of potential nesting habitat is within the 150-foot Buffer Area adjacent to the project site. At the same time, UCI contends that better quality nesting and foraging habitat is located in other areas around the UC San Joaquin Marsh Reserve away from the activities associated with the UCI Facilities Management and Distribution Services buildings, which are directly adjacent to and even encompass a portion of the Project

Development Area. As noted in Response 8-11 above, Mitigation Measure BIO-4 has been revised in the Final SEIR to specify that if special-status species not covered by the NCCP/HCP (which includes White-Tailed kites) are identified during nesting surveys prior to construction, a qualified biologist shall coordinate with California Department of Fish and Wildlife (CDFW) and/or U.S. Fish and Wildlife Service (USFWS), as applicable, to determine measures to avoid and minimize impacts. As such this mitigation measure will ensure there is no take of White-tailed Kites.

- 8-13:** The proposed Project will not result in unrestricted public access to the Marsh nor result in other changes to public access to the Marsh area. As referenced in response 8-3, all bicycle and pedestrian trails will be located on the Project Development Area outside of the 150-foot Buffer Area, including the coastal sage scrub used by the Western Pond Turtle. Additionally, fencing barriers, in consultation with UCI Nature biologists, will be installed to protect Western Pond turtles and other reptiles from moving onto the Project Development Area.

Mitigation Measure BIO-2 has been revised to include additional language regarding the specific steps that need be taken if Western Pond turtle is detected during preconstruction surveys. The revised mitigation measure includes, among other steps, that CDFW be consulted if the Western Pond Turtle is detected, that a Pond Turtle Avoidance and Minimization Plan be prepared by a qualified biologist, and that exclusionary fencing be installed prior to construction to prevent turtles from entering the project site. The fencing plan will further ensure that that exclusionary fencing does not impede Turtles from accessing nesting and estivating site from Marsh wetland areas.

The CSULB Master's thesis shows nest records in the coastal sage scrub within the 150-foot Buffer Area, which is not within the Project Development Area. No turtles were found nesting or estivating on the Project Development Area or in any other disturbed grassland or mustard areas on the North Campus. The Master's thesis notes that all nest sites that were monitored over the course of the study were located on bare ground, either in bare patches in coastal sage scrub with no overhead shrub canopy or in road banks. Although nests in coastal sage scrub had anywhere from 60-90% canopy cover within 1 square meter of each nest, all nests were located in areas with no direct overhead canopy cover. This may make the Project Development Area, which is largely covered in dense mustard, less appealing as nesting areas to the turtles. The project will not directly impact recorded nesting and estivating sites and no temporary or permanent project improvements will impede Turtles from accessing nesting and estivating sites from Marsh Wetland areas.

- 8-14:** Please see Response 8-4 above. The proposed Project will not result in unrestricted public access to the Marsh nor result in other changes to public access to the Marsh area. Access to the Marsh will remain restricted by the University to protect the research, teaching, and habitat management mission of the Marsh. Pedestrian or bicycle trails built as a part of the Project will be located within the Project Development Area and outside of the 150-foot Buffer Area and the Marsh. Barriers would be installed to prevent public access into the 150-foot Buffer Area and Marsh in order to preserve Marsh resources.

The UCI LRDP does include a pedestrian and bicycle trail network as a part of the programmatic LRDP circulation element, including proposed future trails systems that would serve the North Campus. Connections to future UCI or other public trail systems are not part of this Project and

have not been designed, and therefore cannot be evaluated without speculation in the analysis of the Project-level SEIR.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**Letter 9: California Cultural Resource Preservation – Martz**

**P.O. Box 54132**  
Irvine, CA 92619-4132

**California Cultural Resource Preservation Alliance, Inc.**  
An alliance of American Indian and scientific communities working for  
the preservation of archaeological sites and other cultural resources.

October 24, 2020

Lindsey Hashimoto, Senior Planner  
Campus Physical & Environmental Planning  
University of California, Irvine

Dear Ms. Hashimoto:

SUBJECT: Draft Subsequent Environmental Impact Report (SEIR) for the Proposes Irvine Campus Medical Complex (ICMC) project

9-1

Thank you for the opportunity to review the cultural resources portions of the SEIR. We are concerned that another National Register eligible archaeological site will be destroyed to make way for development on the UCI campus. According to CEQA cultural resources guidelines and the California Code of Regulations 15126.4, preservation in place is the preferred manner of mitigating impacts to significant archaeological sites and public agencies should seek to avoid damaging archaeological sites whenever feasible. The cultural resources sections of the SEIR state that archaeological site P-30-00015 is a significant cultural resource, but that avoidance of the adverse effects of the proposed project is not feasible. However, there is no indication that any mitigation measures other than data recovery excavations were ever considered. Given that the project is for a medical complex, consideration should be given to avoidance and preservation of at least the core area of the site within green space. Other mitigation measures that should be considered are provided in Section 21083.2 of the California Public Resources Code.

9-2

Also, of concern is that although the SEIR recognizes that the UCI campus is listed on the Native American Heritage Commission's Sacred Lands Inventory, there is no discussion of mitigation measures for these values. Preservation may avoid conflict with religious or cultural values of groups associated with the site. Data recovery archaeological excavations do not.

9-3

It has been estimated that 90% of archaeological sites in Orange County have been destroyed to make way for development. As a highly esteemed campus of learning and medical advances, please take the lead in historic preservation and consider ways to avoid or minimize the destruction of this significant part of our cultural patrimony.

Sincerely,

Patricia Martz, Ph.D., President

**Response to Letter 9: California Cultural Resource Preservation Alliance – Patricia Martz**

9-1: While UCI acknowledges that preservation in place is the preferred method for preserving archaeological resources per section 15126.4(b)(3) of the State CEQA Guidelines, the Draft SEIR (page 3.4-6) notes that the area in which the Project site is located has been surveyed for potential cultural resources five times since the 1960s. No unique cultural resources, as defined by the California Public Resources Code (PRC) Section 21083.2, has been identified as a result of those studies. The UCI North Campus was evaluated for development in the 2007 LRDP and 2007 LRDP EIR. The 2007 LRDP EIR concluded that potential impacts on cultural resources would be less than significant with mitigation incorporated. The 2007 LRDP EIR included Mitigation Measures Cul-1A, Cul-1B, Cul-1C, Cul-2A, Cul-2B, and Cul-2C related to the protection of cultural resources.

The proposed project implemented mitigation measures Cul-1A and Cul-2A by preparing a technical cultural resources study (Draft SEIR Appendix D) as part of the preparation of the Draft SEIR. Page 3.4-11 of the Draft SEIR notes that the archeological site is considered eligible for the California Register of Historical Resources under the criterion related resources likely to yield important information about prehistory. Mitigation Measure CUL-1 would be implemented which outlines a Data Recovery Plan. The Data Recovery Plan is the systematic recovery of site data, including artifacts, stratigraphy, and cultural features.

Mitigation Measures Cul-1B and Cul-1C also require archaeological and Native American monitoring during construction. It should be noted that Mitigation Measures Cul-2B and Cul-2C do not apply to the Project because there are no historic resources on the Project site. Additionally, the Final SEIR has been revised to include Mitigation Measure TCR-1:

**MM TCR-1:** If subsurface deposits believed to be cultural or human in origin, or tribal cultural resources, are discovered during construction all work shall halt within a 100-foot radius of the discovery, the Construction Manager shall immediately notify UCI Physical and Environmental Planning and Design & Construction Services. The Construction Manager shall also immediately coordinate with the tribal monitor and Project archaeologist meeting the Secretary of the Interior’s Professional Qualification Standards for archaeology and subject to approval by UCI to evaluate the significance of the find and develop appropriate management recommendations. All management recommendations shall be provided to UCI in writing for UCI’s review and approval. If recommended by the qualified professional and consulting tribes, and approved by UCI, this may include modification of the no-work radius.

The professional archaeologist and tribal monitors must make a determination, based on professional judgement and supported by substantial evidence, within one business day of being notified, as to whether or not the find represents a cultural resource or has the potential to be a tribal cultural resource. The subsequent actions will be determined by the type of discovery, as described below. These include: 1) a work pause that, upon further investigation, is not actually a discovery and the work pause was simply needed in order to allow for closer examination of soil (a “false alarm”); 2) a work pause and subsequent action for discoveries that are clearly not related to tribal cultural resources,

such as can and bottle dumps, artifacts of European origin, and remnants of built environment features; and 3) a work pause and subsequent action for discoveries that are likely related to tribal cultural resources, such as midden soil, bedrock mortars, groundstone, or other similar expressions.

Whenever there is question as to whether or not the discovery represents a tribal resource, culturally affiliated tribes shall be consulted in making the determination. The following processes shall apply, depending on the nature of the find, subject to the review and approval of UCI:

- Response to False Alarms: If the professional archaeologist in consultation with the tribal monitor(s) determines that the find is negative for any cultural indicators, then work may resume immediately upon notice to proceed from UCI's representative. No further notifications or tribal consultation is necessary, because the discovery is not a cultural resource of any kind. The professional archaeologist shall provide written documentation of this finding to UCI.
- Response to Non-Tribal Discoveries: If at the time of discovery a professional archaeologist and tribal monitor(s) determines that the find represents a non-tribal cultural resource from any time period or cultural affiliation, UCI shall be notified immediately, to consult on a finding of eligibility and implementation of appropriate treatment measures pursuant to Mitigation Measure CUL-1.
- Response to Tribal Discoveries: If the find represents a tribal or potentially tribal cultural resource that does not include human remains, the [tribe(s)] and UCI shall be notified. UCI will consult with the tribe(s) on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be either a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines, or a Tribal Cultural Resource, as defined in Section 21074 of the Public Resources Code. Preservation in place is the preferred treatment, if feasible. Work shall not resume within a 100-foot radius until UCI, through consultation as appropriate, determines that the site either: 1) is not a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines; or 2) not a Tribal Cultural Resource, as defined in Section 21074 of the Public Resources Code; or 3) that the treatment measures have been completed to its satisfaction.
- Response to Human Remains: If the find includes human remains, or remains that are potentially human, the construction supervisor or on-site archaeologist shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641) and shall notify UCI and the Orange County Coroner (per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California Public Resources Code, and Assembly Bill 2641 shall be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the Native American Heritage Commission (NAHC), which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the Public Resources Code). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. Public Resources Code

§ 5097.94 provides structure for mediation through the NAHC if necessary. If no agreement is reached, UCI shall rebury the remains in a respectful manner where they will not be further disturbed (§ 5097.98 of the Public Resources Code). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the Orange County Clerk's Office (AB 2641). Work shall not resume within the no-work radius until UCI, through consultation as appropriate, determines that the treatment measures have been completed to its satisfaction.

Mitigation Measure TCR-1 outlines specific actions to be taken if subsurface deposits believed to be cultural or human in origin, or tribal cultural resources, are discovered during construction. Implementing TCR-1 requires a qualified archaeologist and the consulting tribes to evaluate the significance of the find and develop appropriate management recommendations. Both Mitigation Measures CUL-1 and CUL-2 have been revised in the Final SEIR to reference TCR-1 with regard to implementing a management plan if tribal cultural resources are discovered during construction.

UCI reviewed the location and characteristics of archaeological site CA-ORA-115 during ICMC project planning and has identified the opportunity to preserve areas of CA-ORA-115 Locus B based on the proposed site plan configuration. As a result, the majority of CA-ORA-115 Locus B will be avoided and remain undisturbed by project construction. In addition, UCI will preserve an area of Locus B as dedicated open space as part of the ICMC Project. In addition to avoiding and preserving areas of CA-ORA-115 Locus B, UCI will implement a comprehensive data recovery and monitoring program in consultation with Tribal Representatives and Professional Archaeologists for any areas of Tribal Cultural Resources that will be impacted by ICMC project construction. However, Project implementation would destroy areas of the resource within the Project site, and only partial avoidance is possible. As such, the impact on cultural resources is considered a significant and unavoidable impact.

- Section 21083.2 of the PRC does list mitigation measures for unique archaeological resources as defined by Section 21083.2(g). However, the definition of unique archaeological resources is narrower than that of the California Register of Historic Resources. And while the resources identified on site may contribute to an understanding of Native American subsistence strategies, there is no evidence that they have “special or particular quality[ies] such as being the oldest of its type or the best available example” and do not have special or particular qualities that warrant the preservation requirements of unique archaeological resources as defined by the PRC. With regard to the methods of preservation listed within section 15126.4(b)(3) of the State CEQA Guidelines, UCI evaluated the feasibility of avoidance and preservation of CA-ORA-115 as part of ICMC project planning: A majority of Locus B of CA-ORA-115 will remain undisturbed and intact. Avoidance of a portion of the Locus B area is proposed within the Project site. No development or disturbance is proposed in this area of the Project site and it will be left in its natural state.
- Similarly, this portion of Locus B within the Project site will be preserved in place as an open space area. Preservation of the entire CA-ORA-115 as parks, greenspace, or other



open space within the Project site is not feasible due to the distribution of CA-ORA-115, and the necessity for grading and clearing required to accommodate the proposed buildings and other improvements.

- Covering the Project site with a soil cap is not feasible because the grading and clearing involved in preparing the site for development would result in disturbing the top layers of soil where most archaeological resources are likely to be found.
- Deeding the site into a permanent conservation easement is not feasible because the CA-ORA-115 site covers a significant area of the Project site and would preclude the Project from meeting any of its Project objectives.

Nonetheless, the SEIR recognized that even after the implementation of a data recovery plan, potential impacts would remain significant and unavoidable.

9-2 With regard to Sacred Lands, none of the Native American tribes contacted by UCI as part of the tribal consultation process identified the Project site as a Sacred Lands site. The Tribal Cultural Resources Section of the SEIR, page (page 3.16-5) discussed UCI's tribal consultation process:

In compliance with PRC Section 21080.3.1(b), the UC Regents has provided formal notification to California Native American tribal representatives that have previously requested notification from the UC Regents regarding projects within the geographic area traditionally and culturally affiliated with the tribe. Native American groups may have knowledge about cultural resources in the area and may have concerns about adverse effects from development on tribal cultural resources as defined in PRC Section 21074. UCI contacted the following tribal representatives on May 26, 2020:

- Gabrieleno Band of Mission Indians – Kizh Nation, Andrew Salas
- Agua Caliente Band of Cahuilla Indians, Patricia Garcia-Plotkin
- Gabrielino/Tongva San Gabriel Band of Mission Indians, Anthony Morales
- Gabrielino/Tongva Nation, Sandonne Goad
- Gabrielino Tongva Indians of California Tribal Council, Robert Dorame
- Gabrielino-Tongva Tribe, Charles Alvarez
- Juaneno Band of Mission Indians, Sonia Johnston
- Juaneno Band of Mission Indians – Acjachemen Nation - Belardes, Joyce Perry
- Juaneno Band of Mission Indians – Acjachemen Nation – Romero, Teresa Romero
- La Jolla Band of Luiseno Indians, Fred Nelson
- Pala Band of Mission Indians, Shasta Gaughen
- Pauma Band of Luiseno Indians, Temet Aguilar
- Pechanga Band of Luiseno Indians, Paul Macarro
- Rincon Band of Luiseno Indians, Bo Mazzetti
- San Luis Rey Band of Mission Indians, San Luis Rey Tribal Council

- Soboba Band of Luiseno Indians, Scott Cozart

Two tribes responded to the notification, Gabrieleno Band of Mission Indians – Kizh Nation and Juaneno Band of Mission Indians – Acjachemen Nation, to initiate consultation regarding the project and the archaeological site, CA-ORA-115, and request on-site monitoring. Neither tribe identified the Project site as a Sacred Lands site during the consultation process. However, per the consultation meetings, the tribes will have Native American representatives for on-site monitoring during the extended Phase I data recovery of P30-000115/CA-ORA-115 and during earthwork for the proposed Project.

Additionally, the Final SEIR has added an additional mitigation to the Tribal Cultural Resources section of the Draft SEIR. The added mitigation measure, TCR-1, has been added to provide mitigation specifically for Tribal Cultural Resources. Mitigation Measure TCR-1 specifies that Native American consulting tribes are included in the construction monitoring, identification, and determination of any unknown tribal cultural resources discovered during construction. Nonetheless, potential impacts remain significant and unavoidable.

- 9-3. As noted in Response 9-1 above, the project site has been surveyed for cultural resources multiple times since the 1960s and no unique cultural resources have been identified. The SEIR includes mitigation measures for data recovery of both cultural resources and tribal cultural resources as well as ongoing construction monitoring during earthwork activities.

**Letter 10: California Cultural Resource Preservation – Valentin**

**P.O. Box 54132**  
**Irvine, CA 92619-4132**

**California Cultural Resource Preservation Alliance, Inc.**  
 An alliance of American Indian and scientific communities working for  
 the preservation of archaeological sites and other cultural resources.

November 7th, 2020

Lindsey Hashimoto, Senior Planner  
 Campus Physical & Environmental Planning  
 University of California, Irvine

Dear Ms. Hashimoto:

SUBJECT: Draft Subsequent Environmental Impact Report (SEIR) for the Proposed Irvine Campus Medical Complex (ICMC) project

10-1 Thank you for the opportunity to review the cultural resources portions of the SEIR. We are concerned that another National Register eligible archaeological site will be destroyed to make way for development on the UCI campus. According to CEQA cultural resources guidelines and the California Code of Regulations 15126.4, preservation in place is the preferred manner of mitigating impacts to significant archaeological sites and public agencies should seek to avoid damaging archaeological sites whenever feasible. The cultural resources sections of the SEIR state that archaeological site P-30-00015 is a significant cultural resource, but that avoidance of the adverse effects of the proposed project is not feasible. However, there is no indication that any mitigation measures other than data recovery excavations were ever considered. Given that the project is for a medical complex, consideration should be given to avoidance and preservation of at least the core area of the site within green space. Other mitigation measures that should be considered are provided in Section 21083.2 of the California Public Resources Code.

10-2 Also, of concern is that although the SEIR recognizes that the UCI campus is listed on the Native American Heritage Commission's Sacred Lands Inventory, there is no discussion of mitigation measures for these values. Preservation may avoid conflict with religious or cultural values of groups associated with the site. Archaeological data recovery excavations do not.

10-3 It has been estimated that 90% of archaeological sites in Orange County have been destroyed to make way for development. As a highly esteemed campus of learning and medical advances, please take the lead in historic preservation and consider ways to avoid or minimize the destruction of this significant part of our cultural patrimony.

Sincerely,

Mr. Sylvere CM Valentin, MA RPA.  
 Vice- President CCRPA

**Response to Letter 10: California Cultural Resource Preservation Alliance – Sylvere Valentin**

10-1: Comment Letter 10 contains verbatim language as Comment Letter 9. Comment Letter 9 was responded to in full.

Please see Responses 9-1 to 9-3.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 11: Julie Coffey**

November 15, 2020

Lindsey Hashimoto, Senior Planner  
Campus Physical & Environmental Planning  
University of California, Irvine  
4199 Campus Drive, Suite 380  
Irvine, CA 92697-2325

RE: Draft Environmental Impact Report for the Irvine Campus Medical Complex (ICMC)

Senior Planner Hashimoto:

11-1

Thank you for the opportunity to provide comments on the University's Draft Environmental Impact Report (DEIR) for the Irvine Campus Medical Complex (ICMC). I respectfully submit these seven comments for your consideration. I also strongly encourage the university to adopt all possible biological resource mitigation measures to prevent erosion of habitat quality in the reserve if a suitable alternative to locating the hospital immediately adjacent the Marsh buffer is not adopted. In addition, I urge UCI to correct its analysis of impacts to biological resources to reflect the information provided below and consider recirculating the report to reflect these changes so the public can comment. The purpose of CEQA is to allow the public to weigh in on a project's impacts which cannot be achieved successfully with incomplete information on the full extent of probable impacts.

Thank you for your thoughtful preparation of this document and please don't hesitate to contact me with questions or additional information. I ran out of time but do have additional clarity and documentation for any comments should they be necessary. I look forward to your responses.

Sincerely,

Julie Coffey

- 11-2 1. THE PROPOSED PROJECT IS NOT CONSISTENT WITH SCAG SUSTAINABLE COMMUNITIES STRATEGY.
  - a. The project as proposed is not in keeping with goals of the sustainable communities strategy: **GOAL 10: Promote conservation of natural and agricultural lands and restoration of habitats.** The DEIR states this goal is ‘Not Applicable’ because the project would preserve adjacent habitat areas. This dodges the point. The proposed project will develop natural land and prevent habitat restoration of an invaluable wetland adjacent upland area. This is particularly concerning at a time when species need habitat to migrate to as a result of habitat loss from climate change rendering current habitats unusable (sea level rise, unprecedented droughts & fires Mills et al. 2016). The statement of ‘Not Applicable’ implies because this natural land is not a reserve it is not relevant in the context of conservation and restoration, and that is untrue, particularly because of the importance of adjacent upland to marsh and riparian species. Therefore the claim that this project is consistent with SCAG Regional Transportation Plan/Sustainable Communities Strategy Consistency is seriously in question.
  - 11-3 b. Further, USDA reports “... the global potential for carbon sequestration from restoring degraded grasslands is significant, with the possibility to sequester approximately 3 Gt C per year—equivalent to reducing atmospheric CO2 by 50 ppm over 50 years.” Grasslands Mediterranean est 8.6kgC/m2”. Which highlights the significance of potential restoration at this site in mitigating local emissions, a stated goal of UCI sustainability policies.
- 11-4 2. THE DEIR FAILS TO IDENTIFY RELEVANT SENSITIVE SPECIES PRESENT IN THE PROJECT AREA.
  - a. The rare plant survey was timed to be biologically irrelevant and therefore tells little information about presence of rare plants. The consultant notes this fact: “...due to project timing, Michael Baker’s 2020 rare plant survey was not conducted during the peak blooming periods for some rare plant species, limiting identification of some species that bloom earlier in the year, particularly annual plant species that may no longer be growing above-ground.” **This is unacceptable for making conclusions about impacts and another rare plant survey must be completed in the Spring, when plants have a chance of actually being there.**
  - 11-5 b. I suggest UCI consult with reserve managers to use see if methods can be employed to prompt germination of native species existing in the seedbank and allowing for seed collection or transplanting of these individuals so the genetic variation from the population is not lost.

- 11-6 c. White-tailed kite (WTKI) occur in the project area for hunting and have nested in willows adjacent to the project area. This is well documented through publicly available Ebird data from trained observers at Sea and Sage Audubon. Citizen Science data can provide important information on species presence, abundances, and habitat use. In particular, these data were collected every month by the same short list of trained, experienced birders and they should be treated on par with CNDDDB entries. A full list of sightings near the project area follows these comments. Impacts to nesting WTKI are considered a significant impact and this species is not covered under the NCCP. **Given the requirement of hunting grounds adjacent nest trees, I suggest that development of this open space could constitute significant negative impact by reducing the breeding habitat quality of the WTKI at the adjacent San Joaquin Marsh Reserve.** I further underline the importance of protective measures outlined in the biological resources report that a monitor should be present to assure no adverse impacts to breeding birds in the buffer and overall project area.
- 11-7 d. **The greatest concentration of Western Pond Turtle nests documented in the marsh were within the project buffer right up against the project footprint** (Figure 1, Nerhus 2016). Further, these data points are only the nests that were found, and do not represent all possible nest locations. Western pond turtles have been documented to nest quite far from the wetland edge, and in other areas have been documented nesting in invaded grasslands. They can also be heavily impacted by nest predation and killed or injured by maintenance and development-associated activities (e.g. mowing, trucks, artificial structures like walls or fencing; Alvarez et al. 2014). It is therefore preferable that any human impacts & habitat modifications happen as far from nesting sites as possible.
  - 11-8 i. **Nesting turtles are also greatly impacted by barriers like walls or fencing.** From Alvarez et al. "We determined—through tracks, trails, direct observation, and camera stations—that the fence line was functioning to direct and concentrate potential predators along the western and southern borders of the marsh. Although we do not know the overall percentage of nests lost to predation, we observed the loss of 16 *A. marmorata* nests in 45 days. We speculate that approximately 30 adult female *A. marmorata* occupy the marsh; if our count is accurate, this attrition would represent a significant level of predation to nesting turtles on the site." This same scenario could occur at the San Joaquin Marsh if care is not taken to assess the impacts of any reserve boundary designs. **A turtle expert (I would recommend Barry Nerhus, as the expert on the marsh pond turtle population) should be consulted prior to any decision making surrounding structures or increased predator access along the buffer.**



**FIGURE 17. Aerial Map with vegetation community types. Points in the freshwater marsh are locations of females in pond before nest movements. Each number or letter denotes the pond in which the turtle resided prior to nesting. Each colored point in the ponds corresponds to the same color nest site**

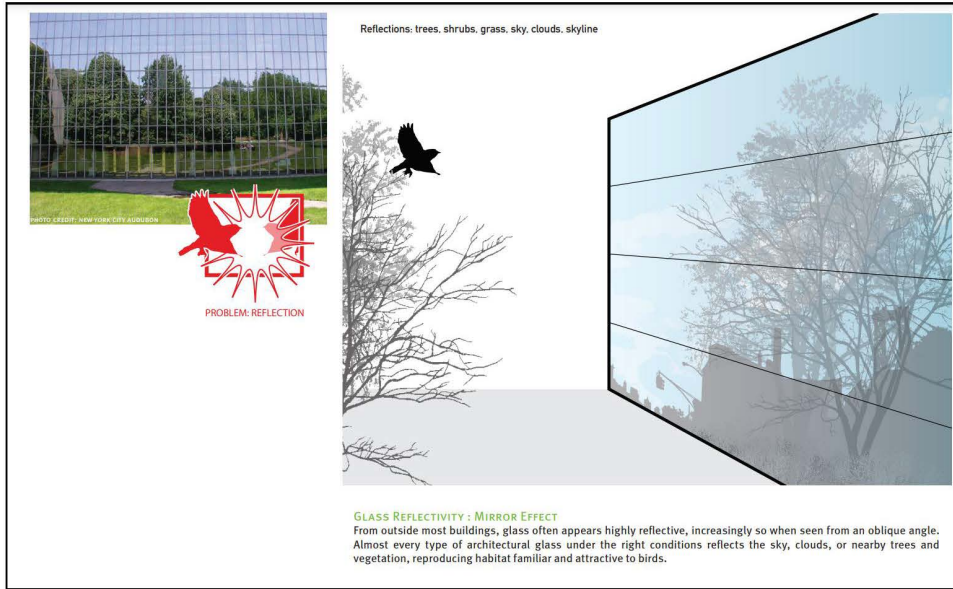
*Figure 1: Western Pond Turtle nest locations in 2012 from Nerhus. Black outline of project area added for clarity*



11-9

3. THE DEIR FAILS TO PROVIDE PLANS FOR ADDRESSING BIRD-BUILDING COLLISIONS.

a. The project would site a glassy multi-story building adjacent a significant migratory stopover within the pacific flyway and an important breeding area for threatened species. One of the leading threats to birds from humans are collisions with buildings.



11-10

b. A 2014 estimate indicated a staggering range of 365 to 988 million bird deaths a year in the United States directly caused by building collisions. This estimate is broken down into three building types: commercial buildings (4-11 stories tall), which this proposed hospital would fall under, accounting for 60% of the yearly collisions. Reflective and transparent glass windows are really at fault here, as well as lighting. **I would like to see this impact directly addressed through use of bird safe glass. Audubon has a published set of recommendations on how to avoid bird building collisions, available here: <http://www.nycaudubon.org/pdf/BirdSafeBuildingGuidelines.pdf>**

11-11

4. PROTECTION AND ADEQUACY OF THE 150FT BUFFER ZONE.

The function of wetland buffers is to protect the adjacent wetlands and the biological resources that rely on them. **If there are features and activities within the buffers that compromise this function, then the buffers will be inadequate.**

Trails and recreation are examples of such features and activities. First, when building trails in buffers involves removal of vegetation, the buffering services (e.g., reducing

11-11  
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edge effects of the adjacent development and human uses) that vegetation provided are lost. Second, though not widely recognized, trails themselves and non-consumptive recreation (e.g., nature and wildlife viewing and photography, hiking, dog walking, biking, horseback riding) can negatively affect wildlife and habitat (Lucas 2020; Larson et al. 2020). In some cases, these effects can be severe and hinder the retention of ecological functions of protected areas (i.e., in this context, wetlands and buffers). Recreation ecology has shown that the majority of the documented effects on wildlife from non-consumptive recreation are negative. Such effects include detrimental changes to behavior, reproduction, growth, immune system function, and levels of stress hormones, and ultimately the survival of individual animals and persistence of wildlife populations and communities.

11-12

The effects of trails penetrate into adjacent areas such that a zone of effect several hundred meters on either side of trails can encompass a substantial proportion of protected areas and beyond. Science-based concerns about trail- and recreation-related disturbance to vegetation and wildlife are exacerbated by the fact that it is rare that (a) the planning and siting of trails is done well enough, and (b) the management and enforcement of recreation are sufficient, to ensure the perpetuation of species.

11-13

**This information about trails and recreation underscores that it is almost always biologically preferable to place trails outside of wetland buffers.** This must be done without reducing the width of the buffer to accommodate trails outside it; in other words, the appropriate trail width must be determined on the biological merits, and only then would the trail location (typically adjacent to the buffer) within the development footprint be determined. Short of this, whether trails and recreation in a buffer are compatible with the buffer's and adjacent wetlands' functions and values, and the resources they support, depends on many factors requiring thorough consideration. A few such factors are: (1) the adjacent development and human uses; (2) the vegetation type and density within the buffer (3) the wetland species present; (4) the distance of the trail from the wetlands; (5) the types, level, frequency, and schedule of recreation; and (6) the level of management and enforcement of the recreation, including adaptive management. The Final EIR should reflect these and other factors; and I strongly encourage the Final DEIR to remove trails and any fuel modification or habitat alterations in the buffer. Given presence of threatened species (CAGN, western pond turtle nesting) in this buffer the impacts of any edge effects from this project could be highly significant.

11-14

5. THE DEIR DOES NOT PROVIDE ADEQUATE MEASURES TO PROTECT AGAINST INDIRECT EDGE EFFECTS ON PROJECT ADJACENT HABITAT OCCUPIED BY PROTECTED SPECIES. Edge effects are real, quantifiable impacts to habitat quality as a result of adjacent development or habitat fragmentation (Patten & Bolger 2003; Leston & Rodewald 2006). These include increased abundance or behavioral changes in nest predators like raccoons, crows, and rats, influence of human or dog activity on habitat use by

11-14  
cont'd

predators and prey, increased likelihood of invasive species introduction, lighting and noise impacts to circadian rhythms and foraging success. All these effects are well documented in the literature and can lead to reduced habitat functionality over time. I strongly urge UCI to consider these impacts and adopt measures to mitigate them as suggested below.

a. ARTIFICIAL LIGHT.

11-15

i. The DEIR does address best practices in lighting to shield sensitive biological resources. I fully support these measures and add that additional factors should be considered when calculating the amount of light emanating from the project, including the amplifying effect of the marine layer. Patten et al. found in their report of the OC NCCP/HCP in 2017: "Based on our readings, the marine layer plays a significant impact on skyglow effect. Many light studies ignore the marine layer, but our findings demonstrate that this layer is an important feature of light pollution in the Coastal Reserve (Patten 2017)." Additionally, interior lighting should be timed out so that unoccupied rooms are not lit unnecessarily to further reduce Artificial Night Lighting (ANL). **I further urge a commitment to continued communication with land managers of the adjacent reserve and flexibility for retrofitting should impacts to sensitive species be found to occur after the project is established.**

b. NOISE IMPACTS

11-16

i. Increases in ambient noise disrupt the ability of songbirds to communicate, and raptors and owls to hunt. Animals in the San Joaquin Marsh are already subjected to higher than natural noise impacts from plane traffic, and additional operational noise should be minimized where possible. For example, noise generating features of the building (HVAC, air purification, generators) should be located facing away from the natural area and marsh buffer. Similarly, ambulances, loading docks, and other human congregation areas should be located as far from the marsh boundary as possible. Preferably, an ambient noise study would be conducted to determine the impacts to birds breeding in the buffer and adjacent riparian.

c. THE PROPOSED RUNOFF AND DISCHARGE CONTROLS ARE INADEQUATE

11-17

i. The DEIR states: "Site design that controls runoff discharge volumes and durations shall be utilized, where applicable and feasible, to maintain or reduce the peak runoff for the 10-year, 6-hour storm event in the post-development condition compared to the pre-development condition, or as defined by current water quality regulatory requirements." **This is inadequate planning. Climate models have been telling us that Southern California will see increased magnitude storms.** Most recently: "increases in the magnitude and frequency of large storms (> 36 mm/day) which combined with a shorter rainy season, lead to increases in annual peak flows; and (iv) the propagation of the altered precipitation characteristics resulting in nonlinear changes in the magnitude and

11-17  
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variability of annual maximum discharges (i.e., mean, standard deviation, skew) impacting estimated return period discharges (e.g., estimated 100-year flood discharges for the period 2061–2100 under 8.5 increase by up to 185%).” In other words, your historical 10-year storm is probably now an annual storm, and I believe you need to be planning for a 100 year storm. **If you don’t take climate change models into account when designing these catchment basins and discharge controls, you will likely be discharging sediment from your project area because your control systems will be under engineered, and ultimately that could result in degrading habitat and potentially contributing to the Newport Bay sediment TMDL.**

11-18

d. I echo the concerns of Newport Beach on the original LRDP to question whether there is a plan for compliance verification for these BMPs for water quality. I know from experience that without regular, on the ground checks and water quality monitoring of sediment basins, swales, etc. the function of these systems degrades over time. I also echo their recommendations of vacuum street cleaners, pervious pavement, climate-controlled irrigation systems (to reduce erosion), use of native plant palette for landscaping and use of bioswales.

1. UCI should draft a maintenance plan for annual cleaning of all catchment basins, ensure street sweeping etc. UCI should assign a contact person in charge of the annual inspection of these safeguards and be committed to open communication with reserve and watershed stakeholders about potential modifications should stormwater quality standards be unsatisfactory.

11-19

e. **INVASIVE SPECIES INTRODUCTIONS.** Disturbances and landscaping at the edge of natural areas have a high potential for introduction of non-native and invasive plants, animals, and pathogens. **UCI can and should take basic steps combined with clear and continued communication with reserve managers to prevent the introduction and spread of non-native species.**

- i. Development borders with natural reserves are well documented as areas of high invasion potential. A 2015 report on Habitat Conservation Plans (HCPs) in California states “... understanding the science behind edge effects and the best ways to minimize them can be essential ... A study on the invasive Argentine ant species within the Orange County Central and Coastal NCCP/HCP found that the reserve was vulnerable to invasion in areas that were within two hundred meters of an urban or agricultural edge. The study predicted the NCCP/HCP reserve system will become “less functional over time” and that native ant ecological functions will be compromised within invaded areas (Camacho et al. 2016).” In order to prevent further introduction a suite of landscaping and preventative design features should be considered to prevent humans and animals from easily accessing the marsh buffer from the

- 11-19 cont'd
  - ii. In order to address the threats to the reserve faced by introduction of invasive species, **UCI should commit to no invasive plants in the project area and having the planting list approved by the reserve manager prior to implementation.** In addition, best practices for prevention, early detection, and reducing the spread of pests should be employed and trees that are known to be susceptible to borers or bark beetles should be avoided. Other best practices for sustainable landscaping should be followed: <https://www.cal-ipc.org/solutions/prevention/landscaping/>.
- 11-20
  - f. **INCREASED NEST PREDATOR ABUNDANCES THROUGH TRASH SUBSIDIES.**
    - i. An abundance of food associated with open dumpsters and other characteristics of developed landscapes leads to human subsidizing of predator populations. These overly abundant predators can then move into adjacent landscapes, negatively impacting sensitive nesting species like the California gnatcatcher or Western Pond Turtle by predateding their nests. Attempts to preclude these predators can sometimes backfire-one study found pond turtles nested in higher densities along a fence, however raccoons learned to walk along the fence and were able to find and destroy more nests as a result of the artificial barrier. **In order to avoid subsidized predator populations, UCI should invest in dumpsters with wildlife-proof lids, site dumpsters as far from the buffer as feasible, and create a plan to ensure these measures are maintained.**
    - ii. Discouraging feeding of wildlife. It should be made clear through permanent signage to all staff and visitors of the hospital that trash should be disposed of properly and under no circumstances should wildlife be fed (this includes birds like pigeons, etc.) Feeding of wildlife promotes rats and other pests, as well as an overabundance of select species associated with humans that can outcompete native species for resources.
- 11-21
- 11-22
- 11-23
  - The potential cumulative negative impact of edge effects on the San Joaquin Marsh Reserve are difficult to overstate.** Introduction of an invasive shot hole beetle through wood chips or a landscaped plant, for example, could wipe out the entire canopy of the marsh, potentially eliminating habitat for dozens of sensitive species that breed in the riparian forest. Increased abundance and activity of raccoons could lead to sustained declines in one of the largest Western pond turtle populations in Orange County due to nest failures. *It is near impossible to anticipate and mitigate all edge effects/indirect impacts in their entirety, therefore siting development immediately adjacent to a reserve should be avoided whenever possible.* If it absolutely must be located adjacent to the



11-23  
cont'd

reserve, the modifications listed above should be incorporated to mitigate indirect impacts as much as possible. Last, there must be assurance of correct installation, implementation, and continued maintenance (including assignment of responsibility for the quality control and maintenance of these measures, or they will fail see Figure 3).



Figure 3: Open dumpsters on UCI's main campus promote artificially high number of scavengers like corvids (Crows, ravens), rats, and raccoons.

11-24

**6. INCORPORATE CLIMATE CHANGE INTO ASSESSMENTS OF BIOLOGICAL IMPACTS.**

We know protected species will be (currently are) losing habitat as a result of climate change. To quote the report on HCPs again "Climate change threatens to move ecosystems outside their historic variability at an exceptionally fast rate, resulting in species extinctions or significant shifts in geographic distributions, as the locations they currently occupy will become unsuitable for them. Due to climate change in concert with other anthropogenic stressors (like human-induced habitat loss, over-exploitation, invasive species, and disease), substantial losses in species diversity are projected to occur without concerted assistance (Camacho et al. 2016)." **Without taking the regional impact of climate change into account how can we reasonably decide whether this development will result in causing a wildlife population to drop below a sustainable level?**

11-25

7. WHAT IS THE JUSTIFICATION FOR NOT USING A PARKING STRUCTURE IN ALTERNATIVE 3?

a. This would seem a comparable cost, lower biological impact solution relative to the proposed project. UCI claims in the DEIR that because more land area is available to be developed for Alternative 3, a surface lot would be used instead of a parking garage. It is then stated that biological and hydrological impacts would be increased and that makes the alternative less desirable. I fail to understand why Alternative 3 cannot be modified to include a parking garage, which would lessen the footprint and dramatically reduce the biological and hydrological impacts while presumably costing the same as the proposed project. If the proposed project includes funding for a parking garage, it stands to reason this funding would also be available to build the same structure in the Alternative 3 location. Why this was not considered seems odd, and a few explanations present themselves: 1) the proposed project adjacent to the marsh may be preferred by the planning department, and the surface parking lot is a convenient reason not to go with Alternative 3 or 2) there are future conflicting development plans on North Campus that involve these areas, yet are not presented here. Without a detailed explanation of this design decision, I can only speculate, so I request clarification on why this design modification was not considered.

11-26

b. The poorly justified surface parking aside, Alternative 3 is a redevelopment, rather than a development of natural land and is located much further from the boundary with the San Joaquin Marsh Reserve. It therefore greatly reduces the biological impacts with respect to sensitive species in the buffer, as well as indirect impacts from edge effects that could result in significant degradation of reserve habitat. If the surface lot was replaced with a parking structure, it would also be less likely to impact hydrology of the marsh as there would be minimal new paved area in the watershed relative to the proposed project. For these reasons, I support a modified Alternative 3 with a parking structure as a preferred alternative to the proposed project with respect to biological and hydrological resources. If a clear reason why a parking structure cannot be implemented is not able to be detailed, I urge UCI to recirculate the DEIR with the modified alternative in keeping with CEQA regulations to provide the public opportunity to comment.

ADDITIONAL RESOURCES

Bird fatal light awareness program (FLAP) - <https://flap.org/>

<http://www.nycaudubon.org/pdf/BirdSafeBuildingGuidelines.pdf>

Effects of night lighting: <https://travislongcore.net/research/light-pollution/>

USDA grassland carbon management: <https://www.fs.usda.gov/ccrc/topics/grassland-carbon-management>



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## Response to Letter 11: Julie Coffey

**11-1:** This comment prefaces the balance of the commenter's letter urging adoption of mitigation, requesting recirculation, and highlighting one of the purposes of CEQA which includes public disclosure. These concerns are addressed in full in response to the subsequent comments, below. No further comment is required.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**11-2:** UCI does not concur that the proposed Project conflicts with the SCAG Sustainable Communities Strategy. It should be noted that the SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. The RTP/SCS also considers existing development patterns, existing land use plans, such as the UCI LRDP and Irvine General Plan, in its recommendations. The Project has been planned and is consistent with the UCI LRDP Project Site location and development intensity. The LRDP is a comprehensive land use plan providing mixed-use development, a work-live-learn community, sustainable transportation network and green building systems, and preserves, manages, and restores a significant network of natural areas and other open space as part of the campus, in addition to UC and community-wide open space management and protection programs. The LRDP and ICMC Project is consistent with SCAG Sustainable Communities Strategies. The comment does not provide any substantial evidence that the Project conflicts with the SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.

UCI disagrees with the comment that the Project does not promote the preservation of natural land, agricultural land, and the restoration of habitats. As discussed on page 2-1 of Chapter 2.0 Project Description, the Project is part of the LRDP that sets forth concepts, principles, and plans to guide future growth of the UCI campus and was designated for development in that plan. In addition, the Irvine General Plan designated the Project site for use as Education/Public Facilities.

The Project Site includes both the Development Area, where project improvements will be located, and the 150-foot Buffer Area that separates the Development Area from the Marsh. No Project structures, roads, or paths will be located in the Buffer Area. As shown in Figure 3.3-1 and Table 3.3-1 of the Draft SEIR, 15.38 acres of the 16.86-acre surveyed area (91%), which includes the Development Area, 150-foot Buffer Area, and the temporary laydown area, are identified as disturbed, ornamental, or developed habitat. The coastal sage scrub habitat is located within the 150-foot Buffer Area where no development is proposed. Further, there are 322 acres of existing open space on and surrounding the ICMC site, including the 150-foot Buffer Area, UCI NCCP Habitat Reserve areas including the former landfill site, UC San Joaquin Marsh Reserve, and Irvine Ranch Water District marsh corner parcel. The 322-acre area does not include approximately 18 acres that is identified for future development on the North Campus within the 2007 LRDP. The ICMC Project will permanently remove approximately eight acres of disturbed habitat within the Project Development Area, which is approximately two percent of the existing open space, leaving approximately 98 percent of open space post-Project. The Project would promote the protection of the nearby Marsh habitat by incorporating and maintaining the 150-foot Buffer Area.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 11-3:** The comment cites the USDA report and the potential for grassland carbon sequestration. Page 3.7-9 of Chapter 3.7 Greenhouse Gas Emissions (GHG) of the SEIR discusses the mechanism of sequestration and page 3.7-11 discusses sequestration in relation to Executive Order B-55-18. Further pages 3.7-19 through 3.17-35 discuss the Project impacts related to GHG emissions. As discussed on page 3.7-20 of the SEIR, MM GHG-1 requires the Project to be consistent with UCI's campus-wide carbon neutral targets identified in the UCI CAP and the UC Policy on Sustainable Practices. The UCI CAP also describes UCI's planning goals related to carbon sequestration. Implementation of MM GHG-1 would reduce and offset the GHG emissions from the proposed Project. Additionally, the landscape plan for the Project will use native plant species and other environmentally appropriate, non-invasive plants, and the plant palette and planting locations will be reviewed by UCI Nature. Please see Response 11-2 regarding the Project's consistency with the SCAG SCS. As the Project is consistent with the long range development plans of the both the 2007 LRDP and SCS, habitat loss and carbon sequestration is accounted for in the GHG analyses prepared for regional plan that account for planned growth. As such potential impacts related to GHG impacts related to carbon sequestration are less than significant.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 11-4:** UCI does not concur that the rare plant survey was timed to be biologically irrelevant. The Project Site consists of the Development Area, where the buildings and pedestrian and bike trails will be sited, and the 150-foot Buffer Area between the Development Area and the UC San Joaquin Marsh Reserve. Most species that could occur are perennial and would be present even if not in bloom, or are annual but the survey fell within their blooming period. Those plants that are annual and for which the blooming period was missed are either not expected within the Development Area of the Project Site or are not considered for impacts under CEQA (CRPR 3 and 4). The on-site habitat of the Development Area is dense, tall mustard choking out other species, and the likelihood of rare plants being able to grow in it are considered very low.

Page 3.3-17 of the Draft SEIR discusses sensitive plants based on the studies and states the following:

"There is one special-status plant species with moderate potential to occur on the Project site: many-stemmed dudleya (*Dudleya multicaulis*; CRPR 1B.2). Special-status species with a CRPR 1 or 2, such as the many-stemmed dudleya, do not warrant legal protection under federal or State law; although, potential impacts are required to be disclosed under CEQA.

The 2007 LRDP EIR identifies that many-stemmed dudleya is documented within the UCI NCCP Reserve Area in the western portion of the South Campus Sub-Area. A few isolated individuals have been observed within the developed portions of the LRDP Biological Resources Study Area (North Campus Sub-Area, West Campus Sub-Area, East Campus-Northern Sub-Area, and East Campus-Southern Sub-Area). The 2007 LRDP EIR notes that, *based on years of focused botanical surveys*, it is considered unlikely that this species is present outside the documented sites (none have been documented at the Project site).

The 2007 LRDP EIR states that any incidental take of this species would be a significant impact. The many-stemmed dudleya is not covered under the NCCP. Due to this, the Proposed Project implemented a Project-specific mitigation measure BIO-1, which requires a focused rare plant survey prior to construction. In compliance with BIO-1, qualified biologists from Michael Baker International performed a focused rare plant survey within the Project survey area in September 2020, and no special-status plant species were found on-site.”

Note that the years of focused surveys in italics above were conducted during the species blooming period and were not found. Accordingly, the Draft SEIR does not conclude that a less than significant impact would result solely from the surveys that were conducted. As noted in the quote above, Page 3.3-18 of the Draft SEIR includes Mitigation Measures BIO-1 which requires focused rare plant surveys to be conducted prior to construction to confirm the years of focused surveys that have been conducted to date. No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 11-5:** The comment suggests coordination with the Reserve Manager to determine methods to prompt germination of native species. As noted in Response 11-2, approximately 91% of the surveyed area is disturbed habitat and as discussed in Response 11-4, the on-site habitat is dense, tall mustard choking out other species, and the likelihood of rare plants being able to grow in it are considered very low. Additionally, UCI will continue to work in close consultation with UCI Nature biologists that manage the UC San Joaquin Marsh Reserve regarding Project planning, design, and operations elements to protect wildlife and support the University’s teaching, research, and habitat management mission of the UC San Joaquin Marsh Reserve. No new or additional mitigation measures with regard to native or rare plants are recommended or required.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 11-6:** The potential presence of White-tailed Kite is discussed in the Biological Resources Report following the database searches on April 11, 2019. The report noted that the potential for occurrence of the species was low but recognized an occurrence 0.4 mile to the southeast outside of the survey area. The report noted that suitable nesting habitat within the survey area was marginal. The Arroyo Willow Riparian Forest habitat area at the southern edge of the 150-foot Buffer Area that could potentially allow for nesting habitat is not a part of the Development Area and will not be directly impacted by the Project. White-tailed Kites do not nest on the Development Area as there is no suitable nesting habitat.

eBird records are not practical to include as it is an application used by bird watchers to report bird sightings but does not require specification of the geographic location, such as spatial coordinates, that a bird was observed. Furthermore, as any person can post to the eBird site, there is no way to confirm the veracity of the information or the qualifications of people posting to the site, and as such it is not considered substantial evidence and a reliable source of information for the SEIR. (See *Bowman v City of Berkeley* (2004) 122 Cal.App.4th 572, 583 (fact-based comments must be supported by evidence of factual foundation and observers’ qualification to be substantial evidence; non-expert opinion is not substantial evidence for CEQA.) Further, review of eBird records suggests that White-tailed Kites are commonly observed in the adjacent UC San Joaquin Marsh Reserve, not on the project site, but only a handful of sightings in

eBird include any comments/details about the sightings. Of the few observations that do include comments, none indicate where a nest is present and most either indicate kite presence over the ponds or simply state what time the birds were observed. Nearly all of the eBird records have no comments and therefore there is no way to know exactly where any kites were observed. There are no eBird records that indicate that kites are nesting closer than the nest record in the CNDDDB located approximately 0.4 miles from the survey area. Therefore, the nest data in the CNDDDB is the most accurate for use on a map for the SEIR, as it states a specific location. It should be noted that the CDFW was provided with the SEIR and technical appendices during the public review period for the SEIR and all measures they suggested have been adopted.

While White-tailed Kites do not nest on the Development Area and the Development Area does not contain nesting habitat, UCI recognizes that kites may forage over the currently undeveloped portion of the Development Area (approximately eight acres) and furthermore that a small amount of potential nesting habitat is within the 150-foot Buffer Area of the Project Site. At the same time, better quality nesting and foraging habitat is located in other areas around the UC San Joaquin Marsh Reserve away from the activities associated with the UCI Facilities Management and Distribution Services buildings, which are directly adjacent to and even encompass a portion of the project Development Area. Mitigation Measure BIO-2 has been revised in the Final SEIR to include the White-tailed Kite in the list of sensitive species that require focused protocol surveys prior to construction. Please see Response 1-2. Additionally, Mitigation Measure BIO-4 has been revised in the Final SEIR to specify that if special-status species not covered by the NCCP/HCP (which includes White-tailed Kites) are identified during nesting surveys prior to construction, a qualified biologist shall coordinate with California Department of Fish and Wildlife (CDFW) and/or U.S. Fish and Wildlife Service (USFWS), as applicable, to determine measures to avoid and minimize impacts. As such this mitigation measure will ensure there is no take of White-tailed Kites. Please see Response 8-11.

Should preconstruction surveys determine White-tailed Kites are on-site, UCI will consult with CDFW as needed to determine appropriate avoidance and minimization actions. UCI has identified Reserve lands that can be used for mitigation if required by CDFW.

- 11-7:** Mitigation Measure BIO-2 has been revised to include more specific language regarding the specific steps that need be taken if Western Pond Turtle is detected during preconstruction surveys. The revised mitigation measure includes, among other steps, that CDFW be consulted if the pond turtle is detected, that a Pond Turtle Avoidance and Minimization Plan be prepared by a qualified biologist, and that exclusionary fencing be installed prior to construction.

Permanent fencing barriers, in consultation with UCI Nature biologists, will be installed to keep Western Pond Turtles and other species from moving onto the Project Development Area. Additionally, pedestrian and bike trails will be located in the Project Development Area and outside of the 150-foot Buffer Area. Please see Response 1-2.

- 11-8:** This comment lists concerns related to Western Pond Turtles from walls and other barriers, as well as levels of predation on Turtles, and recommends consulting a named Turtle expert. Please see Response 11-7. The CSULB Master's thesis cited shows nest records in the CSS covered within bluff areas within the 150-foot Buffer Area in an area that will not be within the Project

Development Area. The erection of a fence along the Development Area's boundary has been endorsed by both UCI Nature biologists and by Sea and Sage Audubon Society.

The conditions at the Project site are not the same as the conditions of the study site referenced in the comment. The conditions of the study at Moorhen Marsh were such that the marsh was immediately bordered on all sides by the Shell-Martinez Oil Refinery, the Mt. View Sanitary District's wastewater treatment plant, and Interstate 680. As such, a chain-link fence was erected immediately adjacent to the marsh boundaries to prevent the ingress and egress of turtles at the adjacent operational facilities. Consequentially, all predated turtle nests in the study were located within 10 meters (33 feet) of open water because the turtles had no other upland habitat to nest in other than the immediate edge of the marsh.

The conditions at the Project site are such that a fence, if erected, would be located on the Development Area and a minimum 150 feet (entirety of the Buffer Area) from the edge of the marsh's riparian boundary. This would allow significantly more space for turtles to find nesting opportunities between the marsh edge and the proposed fence line. Notably, the fencing would not encompass the UC San Joaquin Marsh Reserve, as in the Moorhen Marsh site, but would run along the Development Area, meaning that any turtles traveling into uplands would still have the remainder of the open space surrounding the Development Area in which to nest, including the 150-foot Buffer Area.

No trails will be constructed within the 150-foot Buffer Area. In consultation with UCI Nature biologists, the Project will include barriers between the Project Development Area and the 150-foot Buffer Area during construction and throughout the life of the Project to protect Western Pond Turtles and other reptiles from entering the Development Area. Plans for temporary or permanent fencing barriers will be reviewed by a qualified biologist to confirm that barrier placement will not impede Turtles from accessing recorded nesting and estivating sites from the UC San Joaquin Marsh Reserve.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

- 11-9:** The commenter raised concern about the potential for bird strikes to the Project structures. Glare issues are addressed by MM AES-1. UCI will continue to work in close consultation with UCI Nature biologists that manage the UC San Joaquin Marsh Reserve on Project planning, design, and operations elements to protect wildlife and support University's teaching, research and habitat management mission of the San Joaquin Marsh, including architectural and operational features to further reduce the risk of bird strikes. UCI will incorporate a range of bird protection measures in the ICMC project design and has amended MM AES-1 to specify that bird-safe glass applications and other bird-safe exterior design features will be used. Please see Response 8-10 for a list of bird safe measures that are being considered for the project.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

- 11-10:** The commenter requests that the Project include the use of bird safe glass. Please see Response 11-9.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

- 11-11:** The commenter notes the incorporation of the trail could detract from the value of the Buffer Area. All pedestrian or bicycle trails built as a part of the Project will be located on the Project Development Area and will not be located within the 150-foot Buffer Area or the Marsh. In addition, barriers will be constructed to prevent public access into the Buffer Area and Marsh to protect habitat and species within the Marsh.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

- 11-12:** The commenter reiterates concerns related to trails. The commenter is referred to Response 11-11 above.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

- 11-13:** The commenter reiterates concerns related to trails. The commenter is referred to Response to Comment 11-11 above.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

- 11-14:** UCI does not agree that the Draft SEIR does not provide adequate measures against indirect edge effects. The 150-foot Buffer Area was established in the 2007 LRDP to protect the Marsh area from edge effects. Regarding potential impacts from nest predators, the Marsh habitat is in close proximity to existing urbanized development within the UCI North Campus and the city of Irvine, and placement of the new UCI facility would not be considered a substantial attractant to raccoons, crows, rats, or other species that may result in predation on nests. It should be noted that exterior trash receptacles would be secured and emptied regularly to minimize their attraction to such species. As a medical facility, medical waste and trash management is a controlled process to ensure that any medically related waste is not released outside of a facility authorized to dispose of such waste.

Furthermore, Project planning, design and operational planning are proceeding in close consultation with UCI Nature biologists responsible for managing the UC San Joaquin Marsh Reserve. This includes specific discussion and identification of measures to address edge effects including lighting and glare, noise, stormwater management, invasive plant and animal species, and solid waste management. The project includes perimeter fencing on the Development Area along the 150-foot Buffer Area that will prevent humans and pets from crossing from the Development Area into the Buffer Area.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 11-15:** UCI agrees that Draft SEIR includes best practices as well as mitigation to reduce the potential effects from nighttime lighting. Nighttime lighting is addressed on page 3.1-4 of the Draft SEIR

and mitigation is proposed to address nighttime lighting in Mitigation Measure AES-2. As noted in the Draft SEIR:

“[I]mplementation of MM AES-2 would ensure that the lighting plan for the Project was reviewed prior to construction to ensure that building lights, spotlights, floodlights, reflectors, and other means of illumination are shielded or equipped with special lenses in such a manner as to prevent any glare or direct illumination on any public street or other property including the San Joaquin Marsh Reserve.

It should be noted that timers for interior lights are a common energy savings features for new buildings. UCI has committed to constructing the building as a LEED Gold building which requires energy efficient measures such as interior lighting to be controlled by timers or motion sensors. With regard to the marine layer (a coastal weather condition created by temperature inversions), implementation of Mitigation Measure AES-2 will ensure that nighttime lighting from the Project is cast downward and not outward or upward, and that no light trespass over the Project area limits occurs. Additionally, the 150-foot Buffer Area between the Development Area and the Marsh will ensure that lighting from the building is not directly or indirectly trespassing into the Marsh with or without marine layer conditions. Therefore, potential impacts associated with nighttime lighting are less than significant. As noted in Response 11-14 above, UCI will continue to communicate with UCI Nature to further minimize lighting impacts. Please see Response 8-9.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

**11-16:** Chapter 3.11 Noise, discusses the existing noise environment and noise generating uses of the Project. The Project would not substantially contribute to the existing noise levels. As noted in the comment, the existing noise environment consists of noise generated by aircraft and requests operational noise from the Project be reduced. The Project does include design measures that would reduce noise experienced at off-site locations. For example, as shown in Figure 2-6, Conceptual Site Plan of the SEIR, the Central Utility Plant is located on the southwest side of the Development Area, away from the Marsh and Buffer Area. Similarly, the loading area and emergency entrance for the hospital is located on the west side of the building. The building will partially shield the loading area from the Marsh and Buffer Area. The loading area for the Acute Care Center is on the northwest end of the building, away from the Marsh and Buffer Area.

HVAC equipment would be located in the Central Utility Plant or roof mounted (with parapets surrounding the equipment). Other considerations such as noise from ambulances would be intermittent and typically the use of sirens is terminated within the confines of the Project area. It should be noted that while some congregation areas would be located between the buildings, the noise generated by people gathering and talking would be minimized by intervening structures, differences in elevation, landscaping and distance from the Marsh and Buffer Area. Potential impacts from operational noise are considered less than significant.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.



**11-17:** The requirement to maintain and reduce runoff for the 10-year, 6-hour storm event is consistent with Mitigation Measure HYD-1A of the 2007 LRDP EIR. However, the Final SEIR has been revised to clarify on page 3.9-18 and Mitigation Measure HYD-3 (page 3.9-20) to state that Project stormwater systems on site will be designed to maintain the peak runoff from the 25-year, 24-hour storm event. This change is made to be consistent with the current Orange County Hydrology Manual requirements. Designing basins for a 100-year storm is not required pursuant to the guidelines of the Orange County Hydrology Manual and would be excessive for the relatively small watershed draining to the Project site (39.4 acres). Additionally, the Project includes current Low Impact Development (LID) stormwater designs to address increases in peak flows from large storm events. Best Management Practices (BMPs) will be implemented in accordance with Orange County requirements and the storm water quality requirements of the UCI Irvine Storm Water Management Plan dated March 2003 and updated August 2014. The Project storm drainage shall be designed using Orange County LID standards for urban stormwater management with flow through planters and biofiltration areas with underdrains for treatment.

The biofiltration basin built onto the landscaped areas allow water to infiltrate into the ground rather than flowing into detention basins or offsite. Underground detention pipes with flow control devices are located downstream of the bioretention areas to limit the peak flows into the marsh area. Stormwater will be released into the marsh area through shallow catch basin bubblers for flow dispersion and erosion control.

Regarding total maximum daily loads (tmdl), Mitigation Measures HYD-1 and HYD-2 in the Draft SEIR (page 3.9-16) identify pre- and post-construction best management practices (BMPs) to reduce erosion and minimize sedimentation of downstream receiving waters. It should be noted that associated impacts were found to be less than significant.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

**11-18:** The commenter is referred to Response 11-17 above regarding water quality mitigation. In addition, as part of the storm water pollution prevention plan (SWPPP), a monitoring program to ensure the continuing functionality of BMPs would be incorporated during construction. This would include emptying debris traps and removing sediment from basins and other water quality swales as needed. Operationally, maintenance of catch basins, retention basins, and biofiltration strips is the responsibility of the landscaping and maintenance staff for the medical complex. The maintenance operations would follow the same procedures as the rest of the campus as outlined in the UCI Environmental Health & Safety Stormwater Management Guidelines (<https://ehs.uci.edu/enviro/storm-water/index.php>) which addresses the items raised by the commenter. In addition, ongoing consultations with UCI Nature has occurred for the design of water quality features, and consultation will continue throughout Project operation, including regarding maintenance of these features, to ensure preservation of the Marsh and the watershed.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

**11-19:** The landscape plan for the Project will use native plant species and other environmentally appropriate, non-invasive plants, and the plant palette and planting locations will be reviewed by

UCI Nature. The majority of the Project is currently covered in non-native invasive weed species which will be removed as part of the Project. Landscaping on the Project site will be consistent with the goals and objectives of the Green and Gold UCI Landscape Policy (<https://cpep.uci.edu/physical/landscape-policy.php>) which emphasizes native and other environmentally suitable plant materials. The goals of this policy include the following goals:

- Goal 1. Develop a landscape that is sustainable and provides for long term conservation of resources: energy, water, labor, and reduced production of green waste.
- Goal 2. Develop campus landscaping and open space networks that maximize local and regional natural resource values.
- Goal 3. Develop landscaping that provides the greatest functional value consistent with comprehensive campus planning and design objectives.
- Goal 4. While selection of appropriate plant materials and proper planting and irrigation techniques are crucial first steps in developing sustainable landscaping, it is equally important that adequate management programs are in place to preserve this asset.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

**11-20:** Please see Response 11-19. As noted above UCI has developed its own best practices for landscaping with the Green and Gold UCI Landscape Policy and the plant palette will be reviewed by UCI Nature biologists.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

**11-21:** Please see response 11-14. The Project has been designed such that waste bins and dumpsters would be kept located in a designated enclosure and the bins would secure. Trash management and vector control associated with the proposed Project is part of an ongoing coordination with UCI Nature biologists.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

**11-22:** UCI agrees that feeding of wildlife can create situations that attract non-native and unwanted animals. Trash receptacles at outdoor dining facilities and other outdoor seating areas would be designed in consultation with UC Nature biologists to avoid feeding wildlife and would be regularly maintained to meet health and safety requirements. No food for animals will be provided at the medical complex. The hospital operations will be separated from the 150-foot Buffer Area by a 20-foot wide trail and landscaped area. Please see Responses 11-14 and 11-21 regarding trash management.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

**11-23:** The comment states and summarizes concerns related to invasive species and potential effects on native-species and habitats within the adjacent Buffer Area and marsh habitat. The Development Area is separated from the Marsh by the 150-foot Buffer Area established by the

2007 LRDP. As noted in Response 11-19, the UCI Green and Gold UCI Landscape Policy seeks to improve the planning and implementation process for future development more consistently with current campus values, objectives, and priorities. One of the implementation policies under Goal 4 is for “Protection—Control disease and pests through an integrated and environmentally responsible pest management program.” As such, implementation of trash design features to secure solid waste, coordination with UCI Nature biologists regarding safe practices to minimize invasive species, and implementation of an integrated pest management program required in the UCI Green and Gold UCI Landscape Policy would reduce potential indirect impacts, and cumulative indirect impacts to less than significant.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

- 11-24:** The issue of Climate Change is addressed in Chapter 3.7 Greenhouse Gas Emissions. This chapter does address potential changes to the region and looks at ways GHG leading to potential climate change can be reduced at the regional level. UCI has committed to all-electric central plant systems to serve the medical complex consistent with the UCI sustainability policies to reduce the greenhouse gas emissions from the campus. As discussed on page 3.7-20 of the SEIR, MM GHG-1 requires the Project to contribute to UCI’s campus-wide carbon neutrality goals per the UCI CAP and the UC Policy on Sustainable Practices. Implementation of MM GHG-1 would reduce and fully offset the GHG emissions from the proposed Project.

UCI has been a participating landowner in the Orange County NCCP/HCP program since 1996. The NCCP is a mechanism that can provide an early planning framework for proposed development Projects within the planning area in order to avoid, minimize, and compensate for Project impacts to wildlife. The purpose of natural community conservation planning is to sustain and restore those species and their habitat identified by the Department of Fish and Wildlife which are necessary to maintain the continued viability of those biological communities impacted by growth and development. UCI has preserved and managed designated open space areas throughout the campus as a part of the 37,000-acre multi-habitat subregional NCCP reserve system, including preserve areas to the southeast of the Project site adjacent to the San Joaquin Marsh Reserve on a former landfill site. This area is biologically connected to the Project site through existing coastal sage and other habitat types that link the Development Area to the Preserve Area through the 150-foot Buffer Area that extends between the two areas. The Project site is not located within the NCCP Reserve System or identified special linkage areas identified in the plan. The development of the North Campus and the preservation of NCCP Reserve System lands were included in the 2007 LRDP and analyzed in the 2007 LRDP EIR. The proposed Project is consistent with the 2007 LRDP and the NCCP/HCP, including the preservation of the NCCP Reserve System lands.

Participation in the Orange County NCCP/HCP program by UCI is how long-term impacts on biological resources are addressed both as a result of development and other environmental factors (including climate change). As stated on page II-3 of the Orange County Subregional NCCP Plan, “[O]ne purpose of this subregional planning program is to carry out a conservation planning effort on a large-scale, subregional level with sufficient geographic scope and habitat/species diversity to enable cumulative impacts on CSS habitat and related species, reserve design and

connectivity needs to be addressed and satisfied in a manner consistent with the NCCP Conservation Guidelines.” The NCCP is not a static plan, but rather is informed by monitoring and adaptive management. Through the NCCP’s adaptive management approach, reserve areas are monitored to guide management decisions, allowing management plans to adapt and respond to sudden or progressive environmental changes. UCI scientists serve a key role in NCCP science and monitoring programs.

For these reasons, potential cumulative impacts on biological resources such as habitat loss, invasive species, disease, and decreases in diversity are less than significant and no additional mitigation measures beyond what is included in the Draft SEIR are required.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

**11-25:** The Draft SEIR fully discusses and analyzes a reasonable range of feasible alternatives and satisfies the purpose of CEQA by providing UCI, the public, other responsible and trustee agencies with relevant information to inform the decision-making process. In accordance with State CEQA Guideline 15126(f) that is discussed on page 5-2 of Chapter 5.0 Alternatives, the alternatives discussion is guided by a rule of reason and sets forth a reasoned choice of alternatives; an EIR is not required to discuss every iteration of every alternative. The alternatives used were chosen to avoid or substantially lessen significant effects of the Project while feasibly attaining most of the basic Project objectives.

The comment states that Alternative 3 is an otherwise comparable cost to the proposed Project if it includes structured parking as opposed to a parking lot, however this is not correct. The two projects are not equal in costs as Alternative 3 would result in the need for the UCI Support Services Facilities to be relocated and new facilities to be constructed in another location on the UCI campus. Alternative 3, however, regardless of inclusion of a parking structure or surface parking lot, would require demolition and relocation of approximately 117,000 square feet of existing UCI Support Services Facilities within that site. This would result in additional impacts related to the emissions, noise, hazards, and GHG from the demolition activities, as well as additional development-related environmental impacts and costs that would arise due to the need to relocate the existing uses to new buildings and/or the construction of new buildings at a yet to be determined location within the campus. These relocation-related impacts would not occur under the Project.

Therefore, Alternative 3 is proposed without structured parking in order to offset additional development costs and construction impacts associated with the relocation; that way the relative costs of the Project and Alternative 3 would remain more similar. With structured parking, Alternative 3 would greatly exceed costs for the Project.

Further, as noted on page 5-18 of the SEIR, construction in this location would bring development closer to the existing residential units located across Campus Drive. Overall, noise impacts under this alternative related to construction and operations would be greater than those that would occur under the proposed Project. Development of Alternative 3 would increase impacts to

biological resources and hydrology compared to the proposed Project due to the removal of vegetation in the Arboretum area.

As with the proposed Project, this alternative still would result in significant and unavoidable direct and cumulative impacts associated with cultural resources and tribal cultural resources.

The comment characterizes the Alternative 3 as a redevelopment project compared to the proposed Project. However, a portion of the Alternative 3 location is currently developed, and construction of Alternative 3 would remove all or most of the current arboretum area, an open space area consisting of native and ornamental landscaping. It should be noted that a portion of the Project site is currently developed with approximately 12,000 square feet of existing UCI Support Services Facilities buildings, a paved storage yard, and a graded road. This portion of the Project area has been previously disturbed from past grading and the native vegetation has been removed. As such, both the proposed Project and Alternative 3 would redevelop portions of an existing site.

Therefore, with the listed considerations, while Alternative 3 would have no new significant impacts in comparison to the Project, it would not result in a reduction of impacts with or without the parking structure.

Further, as discussed on page 5-20 for Alternative 3, locating the Project near the intersection of Jamboree Road and Campus Drive would reduce connectivity with the existing open space area, and require removal of the Arboretum for the parking lot. This connection to open space, both visually and physically, is a critical component of the landscape that contributes to the healing and wellness environment desired for the Project. This alternative also would not meet two Project objectives including the following:

- Provide a site location with high-quality open space connections to provide an environment that promotes healing and wellness.
- Support the stewardship of adjacent UCI open space resources.

Based on the above, and the full analysis contained in Chapter 5.0 Alternatives, this alternative has not been recommended to the decision-making body for approval.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

**11-26:** Please see Response 11-25 regarding the analysis of Alternative 3.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment. No further comment is required.

**Letter 12: Tammy Le**

**From:** [Tammy Ngoc Le](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Campus Medical Complex Building Grounds  
**Date:** Friday, November 13, 2020 16:42:41

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Dear Lindsey Hashimoto,

I am a 2nd year undergraduate student here at UC Irvine, as well as a local Irvine Resident. I am writing to you about the Irvine Campus Medical Complex Project.

The San Joaquin Marsh is a place where my family and I go hiking on the weekends to relax and bond in nature. It is a place that is near the city of Irvine, but far enough to provide solitude from our daily stressors and challenges (especially during this pandemic).

On behalf of all the hikers and nature lovers and bird watchers in and around Irvine, I urge you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons:

- The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine.
- Access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics
- This location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation.

There are many more environmental reasons and I am sure you can think of some too. I hope that you will hear me, my family, and my fellow peers out by NOT building on the San Joaquin Marsh.

Thank you for your time!  
Tammy Le

12-1

**Letter 12: Tammy Le**

**From:** [Tammy Ngoc Le](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Campus Medical Complex Building Grounds  
**Date:** Friday, November 13, 2020 16:42:41

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Dear Lindsey Hashimoto,

I am a 2nd year undergraduate student here at UC Irvine, as well as a local Irvine Resident. I am writing to you about the Irvine Campus Medical Complex Project.

The San Joaquin Marsh is a place where my family and I go hiking on the weekends to relax and bond in nature. It is a place that is near the city of Irvine, but far enough to provide solitude from our daily stressors and challenges (especially during this pandemic).

On behalf of all the hikers and nature lovers and bird watchers in and around Irvine, I urge you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons:

- The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine.
- Access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics
- This location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation.

There are many more environmental reasons and I am sure you can think of some too. I hope that you will hear me, my family, and my fellow peers out by NOT building on the San Joaquin Marsh.

Thank you for your time!  
Tammy Le

12-1

## Response to Letter 12: Tammy Le

12-1: UCI acknowledges and appreciates this comment. The proposed Project is not located within the San Joaquin Marsh Reserve. As discussed on page 2-18 of the SEIR, “The site plan concept includes a 150-foot setback between on-site building development and the San Joaquin Marsh Reserve. This buffer zone was identified in the 2007 LRDP to provide a buffer between the proposed building development and the existing operations and management of the San Joaquin Marsh Reserve.” Please see Figure 2-4 (page 2-5 of the SEIR) for an exhibit that shows how the 150-foot buffer zone is incorporated into the project design.

With regard to impacts on plants and animals, please see Section 3.3, Biological Resources, of the SEIR. This section discussed potential impacts related to special status (sensitive) plant and animal species. Potential impacts were found to be less than significant with the incorporation of mitigation measures. Please see Responses 1-2 and 8-1.

UCI agrees that access to open spaces and the natural environment is an important aspect of planning and development. The 2007 LRDP includes a pedestrian and bicycle trail at the project/buffer zone interface to provide a recreational trail and sustainable circulation link between the Main Campus and North Campus. Accordingly, the project includes walkways to provide connections to the proposed Jamboree sidewalk and joint use trail and connections through the site to the proposed joint-use trail identified in the 2007 LRDP at the project/buffer zone interface south of the project.

The proposed trail segment would provide a new resource for bicyclists and pedestrians and provide a new connection to the UCI main campus and regional trail system, including the proposed recreational trail that would connect to the UCI Naturescape trail system.

With regard to sustainability, Section 2.7 of the SEIR (page 2-24) identifies the Sustainability Design Requirements for the project. Key elements of the University of California and UCI requirements that are applicable to the Project include but are not limited to the following:

- Minimum LEED Silver certification with a goal to obtain LEED Gold certification or better;
- Minimum building energy efficiency requirements: Exceed California Title 24 2019 energy code by 20 percent (outpatient) and ASHRAE 90.1-2010 by 30 percent (inpatient);
- Optimize building and site water efficiency to meet UC sustainability targets; and
- Contributions to campus-wide targets related to fossil fuel reduction, water efficiency, waste reduction, and transportation.

Further, UCI has committed to be an all-electric medical complex consistent with the UCI sustainability policies to reduce the greenhouse gas emissions from the campus. The parking structure will be constructed with the necessary infrastructure for solar panels to be installed for solar electricity to be generated onsite. As discussed on page 3.7-20 of the SEIR, MM GHG-1 requires the project to minimize carbon emissions to assist the campus in becoming carbon



neutral per the UCI CAP and the UC Policy on Sustainable Practices. Implementation of MM GHG-1 would reduce and fully offset the GHG emissions from the proposed Project.

With regard to potential impacts on Native American cultural resources, the Draft SEIR (page 3.4-6) notes that the project site has been evaluated for potential cultural resources five times since the 1960s. No unique cultural resources material has been identified as a result of those studies. The UCI North Campus was evaluated for development in the 2007 LRDP and 2007 LRDP EIR. The 2007 LRDP EIR concluded that potential impacts on cultural resources would be less than significant with mitigation incorporated. The 2007 LRDP EIR included Mitigation Measures Cul-1A, Cul-1B, Cul-1C, Cul 2A, Cul-2B, and Cul-2C related to the protection of cultural resources.

The proposed project implemented mitigation measures Cul-1A and Cul-2A by preparing a technical cultural resources study (Draft SEIR Appendix D) as part of the preparation of the Draft SEIR. The project carries forward Mitigation Measures Cul-1B and Cul-1C which require a data recovery plan and construction monitoring (including a Native American monitor), respectively. It should be noted that Mitigation Measures Cul-2B and Cul-2C do not apply to the project because there are no historic resources on the project site.

Additionally, the Final SEIR has been revised to include Mitigation Measure TCR-1, to address potential impacts to tribal cultural resources. Mitigation Measure TCR-1 provides specific actions to be taken if subsurface deposits believed to be cultural or human in origin, or tribal cultural resources, are discovered during construction. Implementing TCR-1 requires a qualified archaeologist and the consulting Native American tribes to evaluate the significance of the find and develop appropriate management recommendations.

While the Draft SEIR proposes mitigation to reduce impacts to the extent feasible, it is disclosed that the Project would have a significant and unavoidable impact on Cultural and Tribal Cultural Resources. Please see responses 9-1 through 9-3, which provide further discussion regarding these issues and those related to data recovery.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

### Letter 13: Sidika Kilic

**From:** [Sidika Kilic](#)  
**To:** [Lindsey Hashimoto](#)  
**Subject:** Medical Complex  
**Date:** Monday, October 12, 2020 09:48:03

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13-1

Good Morning Lindsey,  
I received your letter about the EIR report and took a quick look at it. I moved to Watermarke Condo Complex (corner of Jamboree & campus) in 2018 and therefore I am not aware if there have been previous plans for using the described area for the Medical Complex or this is the first time the public is hearing about it.

The report is very nice and detailed but when I reviewed the transportation and noise attachments I could not tell how much we are going to be affected by them

In plain language my concerns are :

1. Are we going to hear ambulance sirens day and night?
2. Is the traffic on Carlson and campus going to be more busy?
3. How long are the roads going to be closed?

Thank you,

--

Sidika Kilic  
Cell: 1-724-771-1230



**Response to Letter 13: Sidika Kilic**

- 13-1 UCI acknowledges and appreciates this comment. The comments raised in the letter are responded to individual below.

Regarding concerns of hearing ambulance sirens day and night, emergency vehicle noise is discussed on Page 3.11-29 in the Noise section of the SEIR. Emergency vehicle noise would be intermittent, short-term in nature, and occur only under emergency conditions. The use of sirens is regulated, and ambulances use them only in urgent medical matters. They are used in getting to the hospital, but typically not on their final approach, unless a traffic signal requires it. The frequency of medical emergencies that would require visits of emergency vehicles using sirens is difficult to predict but based on experience it is understood that such use would be infrequent. Lastly, as noted in the DSEIR, "...noise for the purpose of alerting persons to the existence of an actual emergency is exempt from both the City of Irvine and City of Newport Beach noise standards pursuant to IMC Section 6-8-205(D)(3) and NBMC Section 10.26.035."

Regarding increased vehicle traffic on Campus Drive Carlson and Carlson Avenue, the project will generate new traffic trips to the project site and it is anticipated that some of the surrounding roadways will see an increase in daily traffic volume. However, as discussed in Section 3.15, Transportation (page 3.15-9) of the SEIR, UCI has used the City of Irvine guidelines and transportation model for evaluating traffic impacts based on Vehicle Miles Travel (VMT) Using VMT, potential transportation impacts are measured by the distance people travel in their cars rather the number of cars on the road. The traffic analysis concluded that with the implementation of Mitigation Measures TR-1 and TR-2 potential impacts would be less than significant. The mitigation measures implement mitigation measures that were developed as part of the 2007 LRDP. These mitigation measure require UCI to develop transportation management programs that encourage on and off campus vehicle trips be encouraging people coming to the campus and the Project site to use alternative means of transportation rather than a single user car. These measures include such items as subsidized public transportation, ride sharing, bicycle parking and showers and locker rooms, shuttle buses, and guaranteed rides home.

Regarding the potential for roads to be closed, it is unknown at this time if lane or roadway closures would be required. As discussed on page 3.15-31 of the SEIR, "Construction site access and temporary lane closures on local roads would be reviewed by the UCI Fire Marshal and local authorities in the cities of Irvine and Newport Beach to ensure adequate emergency access at all times. Construction impacts are temporary in nature and would cease to occur once the Project is completed."

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**Letter 14: Jane Olinger**

**From:** [Jane Olinger](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [Patricia Martz; p.martz@cox.net](#)  
**Subject:** The SEIR for UCI's proposed hospital  
**Date:** Tuesday, October 20, 2020 20:42:22

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Lindsey Hashimoto, Senior Planner  
 Campus Physical & Environmental Planning  
 University of California, Irvine

Dear Mr. Hashimoto,  
 This letter is in regard to the SEIR for UCI's proposed hospital.

It stated that the avoidance of significant archaeological destruction to site P-30-000115 is not feasible.

It has been estimated that 90% of the archaeological sites in Orange County have been destroyed to make way for development. We believe that we are much more enlightened now, and have passed laws, policies and procedures in order to avoid such destruction today.

"Public agencies should whenever feasible, seek to avoid damaging effects on any historic resource of an archaeological nature. PRESERVATION IN PLACE is the preferred manner of mitigating impacts to archaeological sites." (California Code 15126.4 (b) (3) )

Preservation may also enable you to avoid conflict with the religious and/or cultural values of Orange County groups associated with the site. The Irvine Company has had, and continues to have, a good working relationship with the ancestors of the original people who settled this area.

Archaeology, as practiced today, is a destructive process. It is important to preserve the few remaining sites for a future archaeology. Please consider the preservation measures provided in Section 21083.2 of the California Public Resources Code. Incorporate the site, or at least a core area of the site, in a greenspace within the project area.

The UCI area is listed on the Native American Heritage Commission Sacred Lands File. Data recovery archaeological excavations DO NOT MITIGATE for these values or consider the attachment that ancestors of original peoples have for their Sacred Sites.

We were not notified of your meeting. Please add us to your contact list for future communications and meetings. And please feel free to contact us anytime in the future. Our President is Dr. Patricia Martz, PhD ([p.martz@cox.net](mailto:p.martz@cox.net)).

14-1

14-1  
Cont'd

Sincerely,  
M. Jane Olinger  
California Cultural Resources Preservation Alliance, Inc.  
[janeolinger@cox.net](mailto:janeolinger@cox.net)

**Response to Letter 14: Jane Olinger**

- 14-1 UCI acknowledges and appreciates this comment. Please see responses Section 3.4 of the SEIR for a discussion of potential impacts on Cultural resources and Section 3.16 for a discussion on Tribal Cultural Resources. Please see Responses 9-1 through 9-3, which provide further discussion regarding these issues, additional mitigation, and issues related to avoidance, preservation in place, and data recovery.

### Letter 15: Mariam Abbas

**From:** [Mariam Abbas-BA](#)  
**To:** [Lindsey Hashimoto](#)  
**Subject:** San Joaquin Marsh & Irvine Medical Complex  
**Date:** Monday, November 16, 2020 18:28:39

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15-1

As it pertains to the the buffer that will be impacted by the new construction, I am emailing today to reconsider the location of the proposed medical complex. We are already losing so much environment in the world, we don't need to harm it any more in Irvine. It should also be noted that environmental degradation can influence various health issues, which seems ironic as this is the building of a medical complex. If memory serves me right, the marsh is one of two locations proposed.

As a school that prides itself on sustainability and making the world a better place, it shouldn't even be a question if this area should be protected.

Thank you for your time,  
Mariam Abbas

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Mariam Abbas  
BA in Business Administration Class of 2023, UC Irvine Paul Merage School of Business  
abbasma@uci.edu



Create your own [email signature](#)

**Response to Letter 15: Mariam Abbas**

15-1 UCI acknowledges and appreciates this comment. The proposed Project is not located within the San Joaquin Marsh Reserve. As discussed on page 2-18 of the SEIR, “The site plan concept includes a 150-foot setback between on-site building development and the San Joaquin Marsh Reserve. This buffer zone was identified in the 2007 LRDP to provide a buffer between the proposed building development and the existing operations and management of the San Joaquin Marsh Reserve.” Please see Figure 2-4 (page 2-5 of the SEIR) for an exhibit that shows how the 150-foot buffer zone is incorporated into the project design.

Please see Responses 21-1 regarding mitigation and policies related to UCI sustainability.

No changes or modifications to the SEIR have been made or are required as a result of this comment. No further comment is required.



## Letter 16: Angeline Phu

**From:** [Angeline Phu](#)  
**To:** [Lindsey Hashimoto](#)  
**Subject:** Concerns Regarding Construction Plans on the San Joaquin Marsh  
**Date:** Saturday, November 14, 2020 23:56:32

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To whom it may concern:

16-1 I hope this email finds you well. My name is Angeline Phu, and I am a 2nd year student at University of California: Irvine in the School of Biological Sciences. I'm reaching out in regards to concerns over planned developments of an expanded medical complex, which could possibly be built on the San Joaquin Marsh. It is imperative to the students of UCI that the building does not happen on the San Joaquin Marsh.

16-2 I speak mainly with concern for the Acjachemen Nation. As you may know, UCI has already continued with construction projects on 86 sacred sites of the Acjachemen Nation, which is inexcusable and serves as not necessary sacrifices for the advancement of knowledge, but rather as the manifestation of unjust, capitalist avarice that drives people to exploit others in order to line their pockets with silver. Building over the San Joaquin Marsh would make the 86 land-related transgressions against the Acjachemen Nation into 87, all over property that originally was not ours to begin with. The Acjachemen Nation have been guardians over the land that we now call our school—to pay them back by stealing more land is rooted in self-righteousness, ignorance, colonialism, and compliance in enforcing white supremacy against the first marginalized group in the United States. I desperately urge you to not be complicit in the centuries-long sin of thievery and exploitation, especially as an employee of a campus focused on social justice and diversity.

16-3 Moreover, I'm sure you and your colleagues understand the environmental hazards and repercussions that would result from building on the marsh, including, but not limited to: destroying the refuge of several animal and plant species, damaging the current ecosystem dependent on said animal and plant species, and cause unnecessary contaminants and pollution from construction and occupation of the marsh that would expedite the decay of our planet. I stress to you the importance of the ecological preservation of the marsh; in an urban location such as Irvine, it is imperative for students and local residents alike to be able to not only enjoy the marsh's beauty for the sake of mental health, but for those with complications such as asthma to be able to breathe air not polluted with construction-related contaminants. We are both proudly associated with a school that prides itself on sustainability and assurance of quality life through healthcare, and yet the proposed plans to build on the marsh all but defy such standards set on us by our prestigious school.

16-4 I hope my words, and the words of my fellow UCI students who may send emails or other communications regarding the construction plan, have managed to make you and your peers rethink the decision to build on the marsh. Not only is it your moral duty and debt to the Acjachemen Nation to place human life before distorted material desires, but it is your obligation as an inhabitant of our beautiful Earth to stop all plans to defile the San Joaquin Marsh. I look forward to announcements to expand the medical complex somewhere else, preferably one more well thought out and less problematic, by your planning team.

Best,  
 Angeline Phu (she/her)

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**Response to Letter 16: Angeline Phu**

- 16-1 UCI acknowledges and appreciates this comment. The proposed Project is not located within the San Joaquin Marsh Reserve. As discussed on page 2-18 of the SEIR, “The site plan concept includes a 150-foot setback between on-site building development and the San Joaquin Marsh Reserve. This buffer zone was identified in the 2007 LRDP to provide a buffer between the proposed building development and the existing operations and management of the San Joaquin Marsh Reserve.” Please see Figure 2-4 (page 2-5 of the SEIR) for an exhibit that shows how the 150-foot buffer zone is incorporated into the project design.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 16-2 With regard to potential impacts on Native American cultural resources, the Draft SEIR (page 3.4-6) notes that the project site has been evaluated for potential cultural resources five times since the 1960s. No unique cultural resources material has been identified as a result of those studies. The UCI North Campus was evaluated for development in the 2007 LRDP and 2007 LRDP EIR. The 2007 LRDP EIR concluded that potential impacts on cultural resources would be less than significant with mitigation incorporated. The 2007 LRDP EIR included Mitigation Measures Cul-1A, Cul-1B, Cul-1C, Cul 2A, Cul-2B, and Cul-2C related to the protection of cultural resources. Please see Response 16-1 regarding the Project being located out of the Marsh.

The proposed project implemented mitigation measures Cul-1A and Cul-2A by preparing a technical cultural resources study (Draft SEIR Appendix D) as part of the preparation of the Draft SEIR. The project carries forward Mitigation Measures Cul-1B and Cul-1C which require a data recovery plan and construction monitoring (including a Native American monitor), respectively. It should be noted that Mitigation Measures Cul-2B and Cul-2C do not apply to the project because there are no historic resources on the project site.

Additionally, the Final SEIR has been revised to include Mitigation Measure TCR-1, to address potential impacts to tribal cultural resources. Mitigation Measure TCR-1 provides specific actions to be taken if subsurface deposits believed to be cultural or human in origin, or tribal cultural resources, are discovered during construction. Implementing TCR-1 requires a qualified archaeologist and the consulting Native American tribes to evaluate the significance of the find and develop appropriate management recommendations.

While the Draft SEIR proposes mitigation to reduce impacts to the extent feasible, it is disclosed that the Project would have a significant and unavoidable impact on Cultural and Tribal Cultural Resources. Please see responses 9-1 through 9-3, which provide further discussion regarding these issues and those related to data recovery.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 16-3 The project is not located within the Marsh, please see Response 16-1. With regard to impacts on plants and animals, please see Section 3.3, Biological Resources, of the SEIR. This

section discussed potential impacts related to special status (sensitive) plant and animal species. Potential impacts were found to be less than significant with the incorporation of mitigation measures. Please see Responses 1-2 and 8-1.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

16-4 Please see Responses 16-1 and 16-2 regarding impacts on the Marsh and on Native American cultural resources.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

## Letter 17: Kristyn Guernica

**From:** [Kristyn Guernica](#)  
**To:** [Lindsey Hashimoto](#)  
**Subject:** San Joaquin Marsh  
**Date:** Monday, November 16, 2020 13:34:02

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17-1

I'm writing to oppose UCI's development on the San Joaquin Marsh. This is a crucial habitat for endangered species and is an ecosystem that is vital to the health of the state of California and the entire planet. Please reconsider as this will have lasting and irreversible negative impacts.

Kristyn Guernica

**Response to Letter 17: Kristyn Guernica**

17-1: UCI acknowledges and appreciates this comment. The proposed Project is not located within the San Joaquin Marsh Reserve. As discussed on page 2-18 of the SEIR, “The site plan concept includes a 150-foot setback between on-site building development and the San Joaquin Marsh Reserve. This buffer zone was identified in the 2007 LRDP to provide a buffer between the proposed building development and the existing operations and management of the San Joaquin Marsh Reserve.” Please see Figure 2-4 (page 2-5 of the SEIR) for an exhibit that shows how the 150-foot buffer zone is incorporated into the project design.

With regard to impacts on plants and animals, please see Section 3.3, Biological Resources, of the SEIR. This section discussed potential impacts related to special status (sensitive) plant and animal species. Potential impacts were found to be less than significant with the incorporation of mitigation measures. Please see Responses 1-2 and 8-1.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**Letter 18: Olivia Jenkins**

**From:** [Olivia Jenkins](#)  
**To:** [Lindsey Hashimoto](#)  
**Subject:** Irvine Campus Medical Complex Public Comment  
**Date:** Monday, November 16, 2020 13:12:50

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18-1

Dear Lindsey,

I am a graduate student in the UCI Masters in Restoration and Conservation Science program. I urge the planners to reject the placement of the medical complex on critical habitat for endangered species such as the California gnatcatcher. This is such important land for native plants and animals. Please consider choosing a location that does not permanently destroy our native wildlife.

Thank you,  
Olivia Jenkins

**Response to Letter 18: Olivia Jenkins**

18-1 UCI acknowledges and appreciates this comment. The proposed Project is not located within the San Joaquin Marsh Reserve. As discussed on page 2-18 of the SEIR, “The site plan concept includes a 150-foot setback between on-site building development and the San Joaquin Marsh Reserve. This buffer zone was identified in the 2007 LRDP to provide a buffer between the proposed building development and the existing operations and management of the San Joaquin Marsh Reserve.” Please see Figure 2-4 (page 2-5 of the SEIR) for an exhibit that shows how the 150-foot buffer zone is incorporated into the project design.

With regard to impacts on plants and animals, please see Section 3.3, Biological Resources, of the SEIR. This section discussed potential impacts related to special status (sensitive) plant and animal species. Potential impacts were found to be less than significant with the incorporation of mitigation measures. Please see Responses 1-2 and 8-1.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

## Letter 19: Justin Lawrence Fong

**From:** [Justin Lawrence Fong](#)  
**To:** [Lindsey Hashimoto](#)  
**Subject:** Comment on Irvine Campus Medical Complex  
**Date:** Monday, November 16, 2020 14:28:39

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19-1

Hi there,

I'm an undergraduate urban studies student and I normally don't like to be a NIMBY, but I believe it's crucial to preserve the San Joaquin Marsh and to avoid encroaching on endangered species' habitats. I am certain there are other less ecologically-sensitive or brownfield areas of campus that could be better suited for development. Please reconsider the location for this development!

Thank you very much,  
Justin Fong



**Response to Letter 19: Justin Lawrence Fong**

19-1 UCI acknowledges and appreciates this comment. The proposed Project is not located within the San Joaquin Marsh Reserve. As discussed on page 2-18 of the SEIR, “The site plan concept includes a 150-foot setback between on-site building development and the San Joaquin Marsh Reserve. This buffer zone was identified in the 2007 LRDP to provide a buffer between the proposed building development and the existing operations and management of the San Joaquin Marsh Reserve.” Please see Figure 2-4 (page 2-5 of the SEIR) for an exhibit that shows how the 150-foot buffer zone is incorporated into the project design.

With regard to impacts on plants and animals, please see Section 3.3, Biological Resources, of the SEIR. This section discussed potential impacts related to special status (sensitive) plant and animal species. Potential impacts were found to be less than significant with the incorporation of mitigation measures. Please see Responses 1-2 and 8-1.

Project alternatives, including alternative locations, are discussed in the SEIR in Section 5, Alternatives.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**Letter 20: Jeanne Baran**

**From:** [Jeanne Baran](#)  
**To:** [Lindsey Hashimoto](#)  
**Subject:** Irvine Campus Medical Complex Draft SEIR Comments  
**Date:** Tuesday, October 27, 2020 16:24:25

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Re: Appendix D Cultural Resources & Tribal Cultural Resources  
Identification Study

Dear Lindsey Hashimoto,

This letter is in regard to the SEIR for UCI's proposed medical complex on  
the north campus.

20-1

The UCI area listed in this EIR is on the Native American Heritage  
Commission Sacred Lands File. Avoidance of this significant archaeological  
site is critical and adverse effects to the historical resources must be  
avoided. Please consider the preservation measures provided in Section  
21083.2 of the California Public Resources Code and incorporate the site,  
or at least a core area of the site, in a greenspace within the project. Thank  
you.

Jeanne Baran

3126 Scholarship

Irvine, CA 92612

**Response to Letter 20: Jeanne Baran**

- 20-1 UCI acknowledges and appreciates this comment. Please see responses Section 3.4 of the SEIR for a discussion of potential impacts on Cultural resources and Section 3.16 for a discussion on tribal cultural resources. Please see Responses 9-1 through 9-3, which provide further discussion regarding these issues, additional mitigation, and issues related to data recovery.

**Letter 21: Julissa Talamante**

**From:** [julissatalamante@gmail.com](mailto:julissatalamante@gmail.com)  
**To:** [Lindsey Hashimoto](mailto:Lindsey.Hashimoto)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Monday, November 16, 2020 12:03:55 PM

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21-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Sincerely,

Julissa Talamante

**Response to Letter 21: Julissa Talamante**

21-1: UCI acknowledges and appreciates this comment. The proposed Project is not located within the UC San Joaquin Marsh Reserve. As discussed on page 2-18 of the SEIR, “The site plan concept includes a 150-foot setback between on-site building development and the San Joaquin Marsh Reserve. This buffer zone was identified in the 2007 LRDP to provide a buffer between the proposed building development and the existing operations and management of the San Joaquin Marsh Reserve.” The Project Site which includes both the Development Area and the 150-foot Buffer Area. Please see Figure 2-4 (page 2-5 of the SEIR) for an exhibit that shows how the 150-foot buffer zone is incorporated into the project design such that the development area of the Project Site is a minimum of 150 feet from the Marsh, and no new buildings, bike trails, or walkways are located within the Buffer Area.

With regard to impacts on plants and animals, please see Section 3.3, Biological Resources, of the SEIR. This section discussed potential impacts related to special status (sensitive) plant and animal species. Potential impacts were found to be less than significant with the incorporation of mitigation measures. Please see Responses 1-2 and 8-1.

UCI agrees that access to open spaces and the natural environment is an important aspect of planning and development. The 2007 LRDP includes a pedestrian and bicycle trail in the Development Area of the project site at buffer zone interface to provide a recreational trail and sustainable circulation link between the Main Campus and North Campus. Accordingly, the Project includes walkways to provide connections to the proposed Jamboree sidewalk and joint use trail and could accommodate future connections through the site to the proposed North Campus joint-use trail system identified in the 2007 LRDP, if constructed as a part of future projects within the LRDP. As described above, the UCI LRDP identifies future pedestrian and bicycle trails throughout the campus, which may be constructed through future UCI projects, to serve the UCI community and provide linkages to regional trails systems. All pedestrian and bicycle trails proposed as part of the ICMC project will be located within the Development Area of the Project Site and not within the 150-foot Buffer Area.

With regard to sustainability, Section 2.7 of the SEIR (page 2-24) identifies the Sustainability Design Requirements for the project. Key elements of the University of California and UCI requirements that are applicable to the Project include but are not limited to the following:

- Minimum LEED Silver certification with a goal to obtain LEED Gold certification or better;
- Minimum building energy efficiency requirements: Exceed California Title 24 2019 energy code by 20 percent (outpatient) and ASHRAE 90.1-2010 by 30 percent (inpatient);
- Optimize building and site water efficiency to meet UC sustainability targets; and
- Contributions to campus-wide targets related to fossil fuel reduction, water efficiency, waste reduction, and transportation.

Further, UCI has committed to constructing a central plant with all-electric energy systems to serve the medical complex, in lieu of fossil fuel combustion, consistent with the UCI sustainability

policies to reduce the greenhouse gas emissions from the campus. The parking structure will be constructed with the necessary infrastructure for solar panels to be installed for solar electricity to be generated onsite. As discussed on page 3.7-20 of the SEIR, MM GHG-1 requires the project to minimize carbon emissions to assist the campus in becoming carbon neutral per the UCI CAP and the UC Policy on Sustainable Practices. Implementation of MM GHG-1 would reduce and fully offset the GHG emissions from the proposed Project.

With regard to potential impacts on Native American cultural resources, the Draft SEIR (page 3.4-6) notes that the project site has been evaluated for potential cultural resources five times since the 1960s. No unique cultural resources material has been identified as a result of those studies. The UCI North Campus was evaluated for development in the 2007 LRDP and 2007 LRDP EIR. The 2007 LRDP EIR concluded that potential impacts on cultural resources would be less than significant with mitigation incorporated. The 2007 LRDP EIR included Mitigation Measures Cul-1A, Cul-1B, Cul-1C, Cul-2A, Cul-2B, and Cul-2C related to the protection of cultural resources.

The proposed project implemented mitigation measures Cul-1A and Cul-2A by preparing a technical cultural resources study (Draft SEIR Appendix D) as part of the preparation of the Draft SEIR. The project carries forward Mitigation Measures Cul-1B and Cul-1C which require a data recovery plan and construction monitoring (including a Native American monitor), respectively. It should be noted that Mitigation Measures Cul-2B and Cul-2C do not apply to the project because there are no historic resources on the project site.

With regard to Sacred Lands, none of the Native American tribes contacted by UCI identified the Project site as a Sacred Lands site. The Tribal Cultural Resources Section of the SEIR, page (page 3.16-5) discussed UCI's tribal consultation process:

In compliance with PRC Section 21080.3.1(b), the UC Regents has provided formal notification to California Native American tribal representatives that have previously requested notification from the UC Regents regarding projects within the geographic area traditionally and culturally affiliated with the tribe. Native American groups may have knowledge about cultural resources in the area and may have concerns about adverse effects from development on tribal cultural resources as defined in PRC Section 21074. UCI contacted the following tribal representatives on May 26, 2020:

- Gabrieleno Band of Mission Indians – Kizh Nation, Andrew Salas
- Agua Caliente Band of Cahuilla Indians, Patricia Garcia-Plotkin
- Gabrielino/Tongva San Gabriel Band of Mission Indians, Anthony Morales
- Gabrielino/Tongva Nation, Sandonne Goad
- Gabrielino Tongva Indians of California Tribal Council, Robert Dorame
- Gabrielino-Tongva Tribe, Charles Alvarez
- Juaneno Band of Mission Indians, Sonia Johnston
- Juaneno Band of Mission Indians – Acjachemen Nation - Belardes, Joyce Perry
- Juaneno Band of Mission Indians – Acjachemen Nation – Romero, Teresa Romero

- La Jolla Band of Luiseno Indians, Fred Nelson
- Pala Band of Mission Indians, Shasta Gaughen
- Pauma Band of Luiseno Indians, Temet Aguilar
- Pechanga Band of Luiseno Indians, Paul Macarro
- Rincon Band of Luiseno Indians, Bo Mazzetti
- San Luis Rey Band of Mission Indians, San Luis Rey Tribal Council
- Soboba Band of Luiseno Indians, Scott Cozart

Two tribes responded to the notification, Gabrieleno Band of Mission Indians – Kizh Nation and Juaneno Band of Mission Indians – Acjachemen Nation, to initiate consultation regarding the project and the archaeological site, CA-ORA-115, and request on-site monitoring. Neither tribe identified the Project site as a Sacred Lands site during the consultation process. However, per the consultation meetings, the tribes will have Native American representatives for on-site monitoring during the extended Phase I data recovery of P30 000115/CA ORA 115 and during earthwork for the proposed Project.

Additionally, the Final SEIR has been revised to include Mitigation Measure TCR-1, to address potential impacts to tribal cultural resources. Mitigation Measure TCR-1 provides specific actions to be taken if subsurface deposits believed to be cultural or human in origin, or tribal cultural resources, are discovered during construction. Implementing TCR-1 requires a qualified archaeologist and the consulting Native American tribes to evaluate the significance of the find and develop appropriate management recommendations.

While the Draft SEIR proposes mitigation to reduce impacts to the extent feasible, it is disclosed that the Project would have a significant and unavoidable impact on Cultural and Tribal Cultural Resources. Please see responses 9-1 through 9-3, which provide further discussion regarding these issues and those related to data recovery.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**Letter 22: Mariam Al Moubasher**

**From:** [Mariam Al Moubasher](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Monday, November 16, 2020 11:34:09 AM

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22-1

Dear Lindsey Hashimoto,

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons:

The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. **As a school which prides itself on sustainability, a move like this would devastate the local environment.** For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation.

There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Thank You,

Sincerely,

Mariam Al Moubasher

Pronouns: she/ her/ hers ([whats this?](#))

*Environmental Engineering, Bachelor's of Science*



**Response to Letter 22: Mariam Al Moubasher**

22-1: UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

### Letter 23: Gloria Huynh

**From:** [Gloria Viquynh Huynh](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Monday, November 16, 2020 10:49:00 AM

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23-1

Dear Lindsey Hashimoto,

I am an alumni from UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons:

The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine.

Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation.

There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh.

Thank you for your time!  
Gloria Huynh

**Response to Letter 23: Gloria Huynh**

23-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

## Letter 24: Dieda Lopez

**From:** [Deida Lopez](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Monday, November 16, 2020 9:37:19 AM

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24-1

Dear Lindsey Hashimoto, I am a alumni at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

**Response to Letter 24: Dieda Lopez**

24-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 25: Joe Valdez**

**From:** [Joe A](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Monday, November 16, 2020 8:54:17 AM

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25-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

**Response to Letter 25: Joe Valdez**

25-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 82 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 26: Unknown Author**

**From:** S  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Monday, November 16, 2020 8:31:19 AM

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26-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too. I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time



**Response to Letter 26: Unknown Author**

26-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

### Letter 27: Peter Anthony Trejo

**From:** [Peter Anthony Trejo](#)  
**To:** [Lindsey Hashimoto](#)  
**Subject:** Irvine Medical Complex  
**Date:** Monday, November 16, 2020 8:02:11 AM

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27-1

Dear Lindsey Hashimoto,

I am a UC Irvine alumni (class of 2020) and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Best,

Peter Trejo

**Response to Letter 27: Peter Anthony Trejo**

27-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 28: Kaylyn Hoy**

**From:** [Kaylyn Hoy](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Monday, November 16, 2020 1:21:31 AM

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28-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

**Response to Letter 28: Kaylyn Hoy**

28-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 29: Victoria Leonardi**

**From:** [Victoria Leonardi](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 10:12:31 PM

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29-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Sent from my iPhone

**Response to Letter 29: Victoria Leonardi**

29-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

### Letter 30: Disney Williams

**From:** [Disney Williams](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 9:53:15 PM

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30-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Disney Williams

Sent from my iPhone



**Response to Letter 30: Disney Williams**

30-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

### Letter 31: Cassandra Jade Gesmundo Asprec

**From:** [Cassandra Jade Gesmundo Asprec](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 9:23:52 PM

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31-1

Dear Lindsey Hashimoto,

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Warmly,  
Cassandra Asprec

**Response to Cassandra Jade Gesmundo Asprec**

31-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 32: Lia Celeste Rivera**

**From:** [Lia Celeste Rivera](#)  
**To:** [Lindsey Hashimoto](#)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 5:54:16 PM

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32-1

Dear Lindsey Hashimoto,

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Lia Rivera

**Response to Lia Celeste Rivera**

31-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 33: Adrienne Jessica Santiago**

**From:** [Adrienne Jessica Santiago](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** STUDENT CONCERN: Irvine Medical Complex  
**Date:** Monday, November 16, 2020 12:55:52 AM

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33-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Warmly,

**Adrienne Santiago (she/her/hers)**

University of California, Irvine - B.A. Social Ecology, Film and Media Studies Minor  
FRESH Basic Needs Hub Student Assistant, 2020-21  
AnteaterTV Intern, 2020-21

**Response to Adrienne Jessica Santiago**

33-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 34: Umaima Arif**

**From:** [Umaima Arif](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 5:04:20 PM

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34-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Sent from my iPhone



**Response to Umaima Arif**

34-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 35: Rabia Akhtar**

**From:** [Rabia Akhtar](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 5:04:02 PM

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35-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Sent from my iPhone

**Response to Letter 35: Rabia Akhtar**

35-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 36: Brook Juarez**

**From:** [Brooke Juarez](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 2:08:08 PM

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36-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Thank you,  
Brooke Juarez

**Response to Letter 36: Brook Juarez**

36-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 37: Camilo G. Jr. Ciau**

**From:** [Camilo G. Jr. Ciau](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 1:27:19 PM

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37-1

Dear Lindsey Hashimoto,

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on native animals and plants. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment and our community. For the legacy of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites. As you may be aware, UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. Additionally, as a transfer student, one of the features that drew me to choosing UCI over other institutions was the abundance of green spaces at UCI and the surrounding community. I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Sincerely,  
Camilo Ciau  
cciau@uci.edu

**Response to Letter 37: Camilo G. Jr. Ciau**

37-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 38: Samantha Lemus**

**From:** [Samantha Lemus](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 1:25:49 PM

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38-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!



**Response to Letter 38: Samantha Lemus**

38-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 39: Skylar Hanson**

**From:** [Skylar Hanson](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 12:12:33 PM

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Dear Lindsey Hashimoto,

I am a UC Irvine alumni and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Aejachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh.

Thank you for your time!

Skylar Hanson  
Class of 2014

39-1

**Response to Letter 39: Skylar Hanson**

39-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 40: Sahil Katrekar**

**From:** [Sahil Katrekar](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 11:45:33 AM

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40-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

**Response to Letter 40: Sahil Katrekar**

40-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

### Letter 41: Alexandra Huff

**From:** [alexandra.huff](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 11:08:06 AM

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41-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

**Response to Letter 41: Alexandra Huff**

41-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 42: Araceli Mejia**

**From:** [Araceli Mejia](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 10:26:20 AM

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42-1

Dear Lindsey Hashimoto,

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!



**Response to Letter 42: Araceli Mejia**

42-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

### Letter 43: Melanie Ortega

**From:** [Melanie Ortega](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [melanido@uci.edu](mailto:melanido@uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 9:10:58 AM

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43-1

Dear Lindsey Hashimoto,  
I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time.

**Response to Letter 43: Melanie Ortega**

43-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 44: Blanca Aldana**

**From:** [Blanca Aldana](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 8:53:00 AM

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44-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

**Response to Letter 44: Blanca Aldana**

44-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 45: Melina**

**From:** [Melina](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 8:27:32 AM

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45-1

Dear Lindsey Hashimoto,  
I am an alumnus here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh.

Thank you for your time!

Melina

**Response to Letter 45: Melina**

45-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 46: Joanna Olvera**

**From:** [Joanna Olvera](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 7:41:29 AM

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46-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!



**Response to Letter 46: Joanna Olvera**

46-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 47: Jessica Diaz**

**From:** [Jessica Diaz](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 7:22:33 AM

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47-1

Dear Lindsey Hashimoto,

I am an alumna of UC Irvine and received a Bachelor of Biological Sciences in 2015. I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and current and past UCI students by NOT building on the San Joaquin Marsh.

Additionally, I took classes with Dr. Bowler and learned so much by having access to this marsh and getting to enjoy the outdoors right in the backyard of UCI. It is a drawing factor and a reason why many students decide to attend UCI for their biological sciences major and you would lose a big part of that aspect of education.

Thank you for your time!

Best regards,

Jessica Diaz

**Response to Letter 47: Jessica Diaz**

47-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

### Letter 48: Elizabeth Lopez

**From:** [Elizabeth Lopez](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 2:25:57 AM

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48-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Elizabeth Lopez Zaragoza  
Sent from my iPhone

**Response to Letter 48: Elizabeth Lopez**

48-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

### Letter 49: Lily Tran

**From:** [Lily Tran](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 1:29:12 AM

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49-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

**Response to Letter 49: Lily Tran**

49-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 50: Isalys De La Rosa**

**From:** [Isalys De La Rosa](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 1:20:14 AM

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50-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Sent from my iPhone



**Response to Letter 50: Isalys De La Rosa**

50-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

### Letter 51: Miranda Xiao

**From:** [Miranda Xiao](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** New Medical Complex  
**Date:** Sunday, November 15, 2020 12:39:13 AM

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51-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Miranda Xiao

**Response to Letter 51: Miranda Xiao**

51-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

## Letter 52: Katherine Honganh Phan

**From:** [Katherine Honganh Phan](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 12:24:43 AM

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52-1

Dear Lindsey Hashimoto,

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Warmest regards,  
Katherine Phan

**Response to Letter 52: Katherine Honganh Phan**

52-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

### Letter 53: Monserrath Resendiz

**From:** [Monserrath Resendiz](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 11:48:59 PM

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53-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Sent from my iPhone

**Response to Letter 53: Monserrath Resendiz**

53-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 54: Jerry Du**

**From:** [Jerry Du](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 11:16:49 PM

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54-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Sent from my iPhone



**Response to Letter 54: Jerry Du**

54-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 55: Pamela Borden**

**From:** [Pamela Borden](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 11:04:59 PM

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55-1

Dear Lindsey Hashimoto,

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Best,  
Pamela Borden

**Response to Letter 55: Pamela Borden**

55-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 56: Marc Adriel Olegario Villa Fuente**

**From:** [Marc Adriel Olegario Villafuerte](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 10:46:58 PM

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Dear Lindsey Hashimoto,

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. A medical center is certainly valuable, however, locating it on the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well-being -- not to mention the numerous benefits of having a compact campus. As a school that prides itself on sustainability, a decision like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you are very knowledgeable about this issue! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh.

Thank you for your time!  
Sincerely,  
Marc Adriel Villafuerte

56-1

**Response to Letter 56: Marc Adreil Olegario Villa Fuente**

56-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 57: Sydney Baraceros**

**From:** [Sydney Baraceros](#)  
**To:** [Lindsey Hashimoto](#)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 10:21:15 PM

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57-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

**Response to Letter 57: Sydney Baraceros**

57-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

## Letter 58: Mikey Vibal

**From:** [Mikey Vibal](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizinq@asuci.uci.edu](mailto:organizinq@asuci.uci.edu)  
**Subject:** Irvine Medical Complex Project  
**Date:** Saturday, November 14, 2020 8:36:44 PM

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58-1

Dear Lindsey Hashimoto, I am not a student, but an ally to those who are here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Michaela Vibal (she/her) CSUDH



**Response to Letter 58: Mikey Vibal**

58-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

## Letter 59: Luis Angel Fuentes

**From:** [Luis Angel Fuentes](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 8:17:00 PM

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59-1

Dear Lindsey Hashimoto,

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Sincerely,

Luis Fuentes

**Response to Letter 59: Luis Angel Fuentes**

59-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 60: Leonang Angelica Diaz**

**From:** [Leonang Angelica Diaz](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizinq@asuci.uci.edu](mailto:organizinq@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 8:12:57 PM

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60-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

**Response to Letter 60: Leonang Angelica Diaz**

60-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

### Letter 61: Zithlaly Lara

**From:** [Zithlaly Lara](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 8:01:13 PM

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61-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Best,

Zithlaly Lara

**Response to Letter 61: Zithlaly Lara**

61-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 62: Ames Alavez**

**From:** [ames\\_luv](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 7:23:44 PM

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62-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Best,

Amy Alavez



**Response to Letter 62: Ames Alavez**

62-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

### Letter 63: Madeline Clement

**From:** [Madeline Clement](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 7:20:59 PM

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63-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Sent from my iPhone

**Response to Letter 63: Madeline Clement**

63-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 64: Kathryn Suzanna Rugh**

**From:** [Kathryn Suzanna Rugh](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 6:12:45 PM

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64-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

**Response to Letter 64: Kathryn Suzanna Rugh**

64-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 65: Marissa Reina Fukunaga**

**From:** [Marissa Reina Fukunaga](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizinq@asuci.uci.edu](mailto:organizinq@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 5:56:58 PM

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Dear Lindsey Hashimoto,

My name is Marissa Fukunaga and I am a student here at UC Irvine.

I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons:

The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Kind regards,  
Marissa Fukunaga

65-1

**Response to Letter 65: Marissa Reina Fukunaga**

65-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 66: Samantha Amandine Bellier**

**From:** [Samantha Amandine Bellier-Igasaki](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 5:52:02 PM

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Dear Lindsey Hashimoto:

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation.

There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Best,  
Samantha

66-1



**Response to Letter 66: Samantha Amandine Bellier**

66-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

### Letter 67: Bilen Micheal

**From:** [Bilen Michael](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 5:47:19 PM

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67-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Sent from my iPhone

**Response to Letter 67: Bilen Micheal**

67-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 68: Angie Kwan Ho Leung**

**From:** [Angie Kwan-Ho Leung](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 5:43:28 PM

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Dear Lindsey Hashimoto,

My name is Angie Leung, and I am a student here at UC Irvine. I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine.

Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation.

There are many more environmental reasons, and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Best,  
Angie Leung  
[angiekl@uci.edu](mailto:angiekl@uci.edu)

68-1

**Response to Letter 68: Angie Kwan Ho Leung**

68-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 69: Joshua Adam Block**

**From:** [Joshua Adam Block](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 5:36:46 PM

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69-1

Dear Lindsey Hashimoto,

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Kindly,  
Joshua Block

**Response to Letter 69: Joshua Adam Block**

69-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 70: Selin Gharapet**

**From:** [selin.gharapet](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 5:36:15 PM

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70-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!



**Response to Letter 70: Selin Gharapet**

70-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 71: Thu Tuong Minh Nguyen**

**From:** [Thu Tuong Minh Nguyen](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 5:10:28 PM

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71-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Sent from my iPhone

**Response to Letter 71: Thu Tuong Minh Nguyen**

71-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 72: Audrey Leona Harjanto**

**From:** [Audrey Leona Harjanto](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizinq@asuci.uci.edu](mailto:organizinq@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 5:08:28 PM

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72-1

Dear Lindsey Hashimoto,  
I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!  
Audrey Harjanto

**Response to Letter 72: Audrey Leona Harjanto**

72-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 73: Jason Tyler Jungreis**

**From:** [Jason Tyler Jungreis](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 5:03:13 PM

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73-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Sent from my iPhone

**Response to Letter 73: Jason Tyler Jungreis**

73-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 74: Fiona Fan**

**From:** [fionafan@gmail.com](mailto:fionafan@gmail.com)  
**To:** [Lindsey Hashimoto](mailto:Lindsey.Hashimoto)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 5:01:12 PM

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74-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!



**Response to Letter 74: Fiona Fan**

74-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

### Letter 75: Arianna Romero

**From:** [Arianna Romero](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 4:59:59 PM

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75-1

Dear Lindsey Hashimoto,

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

**Response to Letter 75: Arianna Romero**

75-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 76: Alicia Suzanne Drevdahl**

**From:** [Alicia Suzanne Drevdahl](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizinq@asuci.uci.edu](mailto:organizinq@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Saturday, November 14, 2020 4:59:58 PM

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Dear Lindsey Hashimoto,

76-1

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Aejachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! The marsh is also valuable for education, as I have gone on a class field trip to it to learn about its positive impact on the environment. I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

-Alicia Drevdahl

**Response to Letter 75: Arianna Romero**

76-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 77: Katherine Elizabeth Thomas**

**From:** [Katherine Elizabeth Thomas](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Friday, November 13, 2020 8:58:32 PM

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Dear Lindsey Hashimoto,

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being.

As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation.

There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

77-1

**Response to Letter 77: Katherine Elizabeth Thomas**

77-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 78: Mona Amirseyedian**

**From:** [Mona Amirseyedian](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Friday, November 13, 2020 6:54:25 PM

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78-1

Dear Lindsey Hashimoto,

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Best,  
Mona Amirseyedian  
2nd year UC Irvine student (Political Science)

Sent from my iPhone



**Response to Letter 78: Mona Amirseyedian**

78-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 79: Kaitlyn Sapida**

**From:** [Kaitlyn Sapida](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Friday, November 13, 2020 4:26:44 PM

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Dear Lindsey Hashimoto,

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Aejachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

79-1

**Response to Letter 79: Kaitlyn Sapida**

79-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 80: Jun Jang**

**From:** [Jun Jang](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [ASUCI Organizing Commissioner](#)  
**Subject:** Irvine Medical Complex  
**Date:** Friday, November 13, 2020 2:05:08 PM

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80-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

--

Best Regards,  
**Jun Jang (he/him)**  
**School of Social Sciences**  
University of California, Irvine  
Student ID: 93501318

**Response to Letter 80: Jun Jang**

80-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

## Letter 81: Esmeralda Garcia Castellanos

**From:** [Esmeralda Garcia-Castellanos](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Monday, November 16, 2020 8:04:24 PM

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81-1

Dear Lindsey Hashimoto,

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

**Response to Letter 81: Esmeralda Garcia Castellanos**

81-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 82: Jun Huang**

**From:** [Jun Huang](#)  
**To:** [Lindsey Hashimoto](#)  
**Subject:** San Joaquin Marsh Medical Center  
**Date:** Friday, November 13, 2020 4:27:30 PM

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Dear Lindsey Hashimoto,

I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine.

82-1

Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation.

There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Regards,  
Jun Huang



**Response to Letter 82: Jun Huang**

82-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 83: Claire Alcanar**

**From:** [Claire Alcanar](#)  
**To:** [Lindsey Hashimoto](#)  
**Cc:** [organizing@asuci.uci.edu](mailto:organizing@asuci.uci.edu)  
**Subject:** Irvine Medical Complex  
**Date:** Sunday, November 15, 2020 17:45:54

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83-1

Dear Lindsey Hashimoto, I am a student here at UC Irvine and I am writing to you about the Irvine Campus Medical Complex Project. We are calling on you to NOT build on the San Joaquin Marsh. While a medical center is certainly valuable, locating it in the San Joaquin Marsh would cause a lot of unnecessary harm to the environment and wellness of students for the following reasons: The San Joaquin Marsh is a vital refuge for plants and animals in Irvine, building on this Marsh would likely lead to many deaths of wild animals, drive certain species out of Irvine, and damage existing ecosystems dependent on animals from Irvine. Additionally, access to the environment, nature, and open spaces is an important aspect of student mental health and well being. As a school which prides itself on sustainability, a move like this would devastate the local environment. For the prestige of UCI, it would be beneficial to follow our own expectations of sustainability and ethics. The report also says that this location will cause unavoidable harm to Native American land and cultural sites and as you may already know UC Irvine is already built on 86 sacred sites from the Acjachemen Nation. There are many more environmental reasons and I am sure you can think of some too!! I hope that you will hear me and my fellow peers out by NOT building on the San Joaquin Marsh. Thank you for your time!

Sent from my iPhone

**Response to Letter 83: Claire Alcanar**

83-1 UCI acknowledges and appreciates this comment. Comment Letters 21 through 83 were sent from individual commenters but contain verbatim language. The first comment letter, Comment Letter 21, was responded to in full.

Please see Response 21-1.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 84: Bettina Eastman**

November 16, 2020

Lindsey Hashimoto, Senior Planner  
 University of California, Irvine  
 Campus Physical and Environmental Planning  
 4199 Campus Drive, Suite 380  
 Irvine, CA. 92697-2325  
 (949) 824-8692  
[hashimol@uci.edu](mailto:hashimol@uci.edu)

Comments: Irvine Campus Medical Complex Draft SEIR

Dear Ms. Hashimoto,

84-1

As a concerned citizen and wildlife biologist I appreciate the opportunity to comment on the Irvine Campus Medical Complex (ICMC) DSEIR. Yet, I have strong concerns and feel that the documentation is insufficient and in several ways is wholly inadequate as it pertains to this project. In fact, in many cases the study data listed for sensitive species and other environmental impacts is so lacking that a proper evaluation of initial impacts as well as accumulative impacts is impossible to make.

84-2

There is no discussion or investigation of the ecological relationship between the upland bluffs and the marsh preserve areas. And it does not appear that proper biological evaluations were conducted, perhaps because of UCI's enrollment in the NCCP agreement. The DSEIR basically, gives a simple nod to the fact that sensitive species exist in these areas. Yet, does nothing to truly evaluate whether impacts are properly understood or mitigated for. Endangered Species such as the Coastal California Gnatcatcher, Least Bell's Vireo, White-tailed Kite (a California fully protected species that is not covered under the NCCP agreement) and Western Pond Turtle are just a few of the sensitive species that call this area home. The White-tailed Kite and Western Pond Turtle are not only found to use the marsh habitat. But the project area (upland bluff) is an important foraging area for the White-tailed Kite, especially during the breeding season when there are young to feed. And this bluff area is known breeding habitat for the Endangered Western Pond Turtle. See: Nerhus, B.S., 2016. The Movements, Habitat Use and Population Assessment of Western Pond Turtles (*Actinemys moamorata*) in a Southern California Seasonal Wetland. Master Thesis. California State University, Long Beach. (Pro Quest # 10105256).

84-3

In addition, there are several things that must be taken into consideration when a project such as this is being considered. Especially one that is so directly linked to a sensitive habitat area. And for which many are not properly outlined in the DSEIR and therefore cannot be appropriately evaluated and understood to comprehend potential impacts.

84-4

And to be in keeping with UCI's curriculum which teaches environmental sustainability, and responsibility and promotes and advocates for stewardship of open spaces and wildlife, several things must be considered as part of this evaluation process.

Such as:

- 84-5 • Pathways must be built within the project area and not within the buffer zone. Additionally, these pathways should take into consideration the requirements for wildlife to be safe from human, bicycle, or vehicle impacts (should carts or maintenance vehicles be allowed on these trails). And should not impede the necessary travel of breeding (or non-breeding) wildlife such as Western Pond Turtles. These pathways are not outlined in the DSEIR and must be further documented. Furthermore, these pathways should not allow for access to the marsh areas which are currently closed under lock and key to the public and safe from human impacts.
- 84-6 • Windows must be glare free and such that they prevent bird strikes. Birds must be able to see the glass in order to prevent collisions both during the daytime and during nighttime hour when birds migrate.
- 84-7 • Trash cans, both standalone receptacles and dumpsters housing large amounts of waste must be inaccessible to wildlife of all kinds. And must be fashioned (built or housed) in such a way that they can not be left open by humans for extended periods of time leaving them available to be scavenged upon by birds, racoons or other diurnal or nocturnal foragers. Unfortunately, many types of wildlife have grown accustomed to these human receptacles as a plentiful food source which is not healthy for humans or wildlife alike and often leads to the senseless killing of animals.
- 84-8 • Rodents are a main food source for many o the raptors and birds of pray that call the wetlands and uplands home. These vital open spaces are consistently developed making it even more difficult for the survival of these many species. The use of rodenticides is killing off not only the rodents but countless raptors as well as mammals such as racoons, coyotes, and others. Proper use of alternative control methods should be used when management practices are put in place.
- 84-9 • Lighting is insufficiently expressed in the DSEIR and some form of modeling should be made available so that this can be rigorously evaluated. Lighting has the potential to impact birds, bats, insects, rodents, and many other wildlife within and adjacent to the project area. Light pollution has been known to have significant negative impacts to animals as well as humans.
- 84-10 • Pollutants should also be contained in such a manner as to not have any impacts on environmentally sensitive areas. Pesticides, herbicides, petroleum products and other chemical wastes should have a management plan during both dry and wet seasons. And planning for extremely wet seasons should be taken into consideration so there is no possibility of seepage or spillage into the wetlands.
- 84-11 • Landscaping should be of native plants, especially those areas directly adjacent to the protected marsh areas. Native plants are drought tolerant and provide habitat to birds and insects and are vital for survival of such. These plants are easily maintained and require little in the way of maintenance and pesticides. The San Joaquin Wildlife Sanctuary across Campus Dr. from the project area is a perfect example of how native plants can be used as landscape plants.

84-12

Lastly, UCI's own documentation mentions that natural gas should no longer be used in new hospital construction. And the DSEIR mentions the need for a waiver to use this greenhouse gas in this proposed new construction. Yet, it does not explain why this waiver should be issued and why natural gas should be used in this proposed project when UCI's own documents forbid it.

Therefore, it is for this and all the aforementioned reasons why these DSEIR documents are insufficient and inadequate. And need to be revised and resubmitted for public comment and evaluation.

Sincerely,

Bettina Eastman  
[bettinae24@gmail.com](mailto:bettinae24@gmail.com)  
(714) 293-1079

Comments sent as email 11/16/20

**Response to Letter 84: Bettina Eastman**

84-1 UCI does not concur that the Project documentation is insufficient and inadequate. Responses to the comments raised in this letter are provided in the responses below.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

84-2 UCI does not concur that improper biological evaluations were conducted. The Project site was evaluated for potential impacts on biological resources in the 2007 LRDP EIR. The 2007 LRDP EIR found that potential impacts on biological resources were less than significant with the incorporation of mitigation measures. The proposed Project is consistent with the 2007 LRDP and the SEIR incorporates the applicable biological mitigation measures from the 2007 LRDP EIR.

For the preparation of this SEIR, site specific biological surveys conducted by qualified biologists were prepared for the Proposed Project. As noted on page 3.3-7 of the SEIR, the biologists conducted two pedestrian surveys of the site (April 11, 2019 and August 20, 2020). The surveys were conducted to document existing site conditions and biological resources, and to evaluate habitat with the potential to support various special-status plant and wildlife resources, including jurisdictional aquatic or other hydrological features, if present. Prior to conducting fieldwork, literature reviews and database searches were conducted to identify special-status plant and wildlife species, vegetation communities, and other biological resources that have been previously documented within, near, and/or have the potential to occur within the survey area. A supplemental rare-plant survey was conducted for the Project in September 2020 (included as Appendix C-3 to the SEIR). No rare plant species were observed within the survey area during the survey. The SEIR evaluated potential impacts on biological resources and determined that impacts are reduced to less than significant with the implementation of mitigation measures. UCI did incorporate changes to Mitigation Measure BIO-2 in the Final EIR to include preconstruction surveys for White-tailed Kite and more specific language regarding the specific steps that need be taken if Western Pond turtle or western mastiff bat are detected during preconstruction surveys.

The Project is located within the North Campus area designated for development in the 2007 LRDP. The 2007 LRDP identifies that the existing LRDP land use designations for the Project site is Mixed Use–Commercial and Open Space – General. The Mixed Use–Commercial land use designation allows for the construction of facilities for Medical Office, General Office, Research and Development, Academic Uses, Commercial and Retail, Conference Facilities, Residential uses, and Clinical Uses. The Project is consistent with the intensity of development planned in the 2007 LRDP. The proposed development is separated from the San Joaquin Freshwater Marsh Reserve by a 150-foot development Buffer Area established in the 2007 LRDP.

Please see Response 8-2 regarding a discussion of the amount of preserved open space surrounding the Project site and UCI's participation in the NCCP. Please see Response 8-11 regarding Coastal California Gnatcatcher, Least Bell's Vireo, and White-tailed Kite. Please see Response 8-13 regarding the Western Pond turtle.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

84-3 UCI does not concur that the analysis has not been properly outlined in the Draft SEIR and cannot be appropriately evaluated and understood. Site specific biological surveys conducted by qualified biologists were prepared for the Proposed Project, covering the Project Site which includes both the Development Area and 150-foot Marsh Buffer Area. As noted in Response 83-2 above, the Project incorporates the 150-foot development Buffer Area that was established in the 2007 LRDP and separates the Development Area from the San Joaquin Marsh Reserve and in which no buildings, pedestrian, or bicycle paths will be located.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

84-4 With regard to sustainability, Section 2.7 of the SEIR (page 2-24) identifies the Sustainability Design Requirements for the Project. Key elements of the University of California and UCI requirements that are applicable to the Project include but are not limited to the following:

- Minimum LEED Silver certification with a goal to obtain LEED Gold certification or better;
- Minimum building energy efficiency requirements: Exceed California Title 24 2019 energy code by 20 percent (outpatient) and ASHRAE 90.1-2010 by 30 percent (inpatient);
- Optimize building and site water efficiency to meet UC sustainability targets; and
- Contributions to campus-wide targets related to fossil fuel reduction, water efficiency, waste reduction, and transportation.

Further, UCI has committed to build an all-electric central plant to serve the medical complex consistent with the UCI sustainability policies to reduce the greenhouse gas emissions from the campus. The parking structure will be constructed with solar photovoltaic panels for solar electricity to be generated onsite. As discussed on page 3.7-20 of the SEIR, MM GHG-1 requires the Project to minimize carbon emissions to assist the campus in becoming carbon neutral per the UCI CAP and the UC Policy on Sustainable Practices. Implementation of MM GHG-1 would reduce and fully offset the GHG emissions from the proposed Project.

It should be noted the area where the Project will be constructed is not designated as open space. As discussed on page 2-8 of the SEIR, the Project Site is located within the North Campus area designated for development in the 2007 LRDP. The 2007 LRDP identifies that the existing LRDP land use designations for the Project Site is Mixed Use—Commercial and Open Space – General. The Development Area is designated as Mixed Use—Commercial, which allows for the construction of facilities for Medical Office, General Office, Research and Development, Academic Uses, Commercial and Retail, Conference Facilities, Residential uses, and Clinical Uses. The Project is consistent with the intensity of development planned in the 2007 LRDP. The Development Area is separated from the UC San Joaquin Marsh Reserve by a 150-foot development Buffer Area established in the 2007 LRDP, which is designated as Open Space – General. No buildings, pedestrian, or bicycle trails will be located in the buffer area.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.



84-5 The proposed Project will not result in unrestricted public access to the Marsh nor result in other changes to public access to the Marsh area. Please see Response 8-3, all bicycle and pedestrian trails will be located on the Project Development Area outside of the 150-foot Buffer Area, including the coastal sage scrub used by the Western Pond Turtle. Additionally, fencing barriers, in consultation with UCI Nature biologists, will be installed to keep Western Pond turtles and other reptiles from moving onto the Project Development Area.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

84-6 Please see Response 8-10 regarding the bird safe design features that UCI is incorporating into the Project design.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

84-7 Please see Response 11-14 regarding trash management for the proposed Project.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

84-8 Project planning, design and operational planning are proceeding in close consultation with UCI Nature biologists responsible for managing the San Joaquin Marsh Reserve. This includes specific discussion and identification of measures to address edge effects including lighting and glare, noise, stormwater management, invasive plant and animal species, and solid waste management. Operational maintenance, such as pest control, will be closely managed by UCI Health in consultation with the UCI Nature biologists.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

84-9 Please see Response 11-15 regarding potential impacts on nighttime lighting.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

84-10 Please see Response 11-18 regarding stormwater quality measures, which are also outlined in the UCI Environmental Health & Safety Stormwater Management Guidelines (<https://ehs.uci.edu/enviro/storm-water/index.php>).

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

84-11 Please see Response 11-19 regarding landscaping measures. Landscaping on the Project Development Area will be consistent with the goals and objectives of the Green and Gold UCI Landscape Policy (<https://cpep.uci.edu/physical/landscape-policy.php>) which emphasizes native and other environmentally suitable plant materials. In addition, in consultation with UCI Nature biologists, any habitat restoration within the 150-foot Buffer Area would consist of a native plant palette suitable to the Marsh.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 84-12 The Project central utility plant will be all-electric, including electric heat-recovery chillers for all building space and water heating, electric humidifiers, and electric steam generators for sterilization. No natural gas will be utilized by the central utility plant in support of UCI climate protection goals and the UC Sustainability Policy. Page 2-23 of the Final SEIR will be revised to clarify that no natural gas will be used by the central utility plant.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**Letter 85: Barbara Kipreos**

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**From:** Barbara Kipreos <bkipreos@uci.edu>  
**Sent:** Monday, November 16, 2020 22:29  
**To:** Lindsey Hashimoto  
**Subject:** Public Comment for UCI's Draft Environmental Impact Report  
**Attachments:** Public Comment Barb Kipreos.docx

Dear Senior Planner Hashimoto,

85-1 [ Below I outline my comments on UCI's Draft Environmental Impact Report (DEIR) for the Irvine Campus Medical Complex. I'm a UCI Master's student studying Conservation and Restoration Science. The outcome of this project is important to me, and I'm grateful to be able to submit a public comment on it.

Best,  
Barb Kipreos

- 85-2
1. The Purpose of Wetland Buffers
- a. Wetland buffers are supposed to minimize the effects of land use disturbance on local species. For maintaining species diversity, **it's important that the buffer is wide and uninterrupted**, and that some species of birds will need over 330 feet of buffer (Wenger, 1999). Building a large structure within the buffer zone would ruin species diversity for that area.
  - b. One of the species of concern for this location is the white-tailed kite, which has been recorded many times being in and around the San Joaquin Marsh via eBird. This structure would impact any species that would have lived on that land, but even more importantly, the structure will have far-reaching effects on the white-tailed kite. Multiple studies have found that **human disturbance near raptor nests during the breeding season cause avoidance behavior, and this behavior can cause the abandonment of their offspring** (Richardson & Miller, 1997). This is very alarming, especially since the white-tailed kite is a California Protected Species and has been declining in recent years. It would be unethical to build the medical center on the buffer of the San Joaquin Marsh, regardless of whether any active nests are on the build site.
  - c. **Development can also increase the proliferation of invasive species**, which compete with native species (With, 2002). It would be irresponsible to invite invasive species by building such a large structure on the buffer of a local biodiversity hotspot, especially when two native species that live there, the white-tailed kite and the California gnatcatcher, are declining.
- 85-3
- 85-4
- 85-5
2. Mitigating Effects of Building on Wildlife
- a. Windows
    - i. Between 365 million and 988 million birds die each year from building collisions in the U.S., which makes **building collisions the second highest direct human-caused bird mortality not including habitat destruction** (Loss et al., 2014). Locating the building within the buffer zone of a marsh can also result in the "migrant trap effect" (O'Connell, 2001). This is when

85-5  
Cont'd

migratory birds are drawn to an area as a stopover site and are trapped in low quality habitat, in this case being nearby a large windowed building that reflects the surrounding habitat. For UCI to maintain its goal of sustainability there must be bird-safe glass incorporated in every window. Bird-safe glass with etchings were shown to reduce bird-building collisions by up to 91% (Haffey, 2014). Other universities implement bird-safe glass for new buildings, and an example of this is Georgia Tech's Kendeda building built last year. This building will most likely directly kill hundreds if not thousands of birds over its lifetime, and it's worthwhile to make sure that it's far from valuable bird habitat.

85-6

b. Light Pollution

i. **Migratory birds are attracted to light during migration** (Evans Ogden, 2002). Once migratory birds are drawn in, they have to deal with the hazards of reflective windows, coyotes, cats, and other predators, power lines, cars, and scarcity of native plants. It's important that this new building has no upward-pointing lights, which can draw in nocturnal migrators, and doesn't use excessive lights beyond what is needed for security.

85-7

c. Noise Pollution

i. Noise pollution has a large impact on the stress levels of birds. **Birds that live in environments with constant loud noises tend to have glucocorticoid-signaling dysfunction** (Kleist et al., 2018). Once the birds are used to the stress of noise pollution, the baseline of their stress hormones are lowered, and they're less likely to react properly to predators. Not only will the process of building the medical center decrease the survivorship of local birds, but if ambulance sirens are involved, it will likely be a much stronger effect than studies predict. In addition, overall nest success declines with increased noise pollution

85-7  
Cont'd

(Senzaki et al., 2020). It's vital that the medical center is built as far away as possible from valuable wildlife habitat.

3. Alternative 3

85-8

- a. Building the medical center on the Jamboree Road and Campus Drive Alternative would avoid most of the terrible consequences of building on the buffer zone of the San Joaquin Marsh. It just doesn't make sense to endanger two species of concern, destroy valuable habitat, and affect every species in the area when there's a perfectly reasonable alternative. Not only is the site already developed, but it also has better visibility from the road. It's also not clear why there would need to be surface parking when using Alternative 3 but not otherwise. For UCI to truly be sustainable, plans for this medical center must be moved. Otherwise, all of this sustainability talk has simply been lip-service.

## Works Cited

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**Response to Letter 85: Barbara Kipreos**

- 85-1 UCI acknowledges and appreciates this comment. Responses to the comments raised in this letter are provided in the responses below.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 85-2 As discussed on page 2-8 of the SEIR, the Project Site is located within the North Campus area designated for development in the 2007 LRDP. The 2007 LRDP identifies that the existing LRDP land use designations for the Project Site is Mixed Use–Commercial and Open Space – General. The Project Site includes both a Development Area, where project improvements will be located, and the Buffer Area, in which no buildings, pedestrian, or bicycle paths associated with the project will be located. The Development Area is designated as Mixed Use–Commercial, which allows for the construction of facilities for Medical Office, General Office, Research and Development, Academic Uses, Commercial and Retail, Conference Facilities, Residential uses, and Clinical Uses. The Project is consistent with the intensity of development planned in the 2007 LRDP. The Development Area is separated from the UC San Joaquin Marsh Reserve by a 150-foot development Buffer Area established in the 2007 LRDP, which is designated as Open Space – General. No structural development will occur within the 150-foot Buffer Area.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 85-3 Please see Response 8-12 regarding the ebird database. Please see Response 8-11 regarding a discussion on the White-tailed Kite. The Project does not propose to build the hospital or any other structures within the 150-foot Buffer Area.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 85-4 Please see Response 11-19 regarding landscaping measures. Landscaping on the Project Site will be consistent with the goals and objectives of the Green and Gold UCI Landscape Policy (<https://cpep.uci.edu/physical/landscape-policy.php>) which emphasizes native and other environmentally suitable plant materials. The Project does not propose to build the hospital or any other structures within the 150-foot Buffer Area. In addition, in consultation with UCI Nature biologists, any habitat restoration within the 150-foot Buffer Area would consist of a native plant palette suitable to the Marsh.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 85-5 Please see Response 8-10 regarding the bird safe design features that UCI is incorporating into the Project design.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 85-6 Please see Responses 8-9 and 11-15 regarding potential impacts on nighttime lighting.



No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 85-7 Operational noise from the proposed Project is evaluated in Section 3.11 of the SEIR (pages 3.11-25 to 3.11-33). Potential noise impacts were found to be less than significant with the incorporation of mitigation measures. Please see Response 11-16.

Project planning, design and operational planning are proceeding in close consultation with UCI Nature biologists responsible for managing the San Joaquin Marsh Reserve. This includes specific discussion and identification of measures to address edge effects including lighting and glare, noise, stormwater management, invasive plant and animal species, and solid waste management. The 150-foot development Buffer Area will ensure that no structures will be built adjacent to the Marsh area.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 85-8 As discussed in Response 84-2 above, the Project Development Area is not located in the 150-foot Buffer Area. Please see Response 11-25 for the feasibility analysis and the impacts associated with constructing Alternative 3. In addition, Section 5.0, Alternatives, of the SEIR, looked at other possible locations for the proposed Project including an offsite location at the Anaheim General Hospital. This location was found not to be feasible because of the costs involved to retrofit the existing building and it does not have enough space to accommodate the proposed Ambulatory Care Center outpatient program. The SEIR also evaluated an alternative location on the UCI West Campus for consideration by the UC Regents, which was found not to be feasible due reduced allowable development space, which would not accommodate an Emergency Department, and unfavorable location to access by off-campus users.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**Letter 86: Starlyn Howard**

**From:** [pelistan@onebox.com](mailto:pelistan@onebox.com)  
**To:** [Lindsey Hashimoto](#)  
**Subject:** Irvine Campus Medical Complex Draft SEIR Comments  
**Date:** Sunday, November 15, 2020 17:16:51

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Dear Lindsey,

As a concerned member of the public, avid birdwatcher, and member of Sea and Sage Audubon, I welcome the opportunity to comment of the Irvine Campus Medical Complex Draft Subsequent Environmental Impact Report.

- 86-1 Based on the following deficiencies in the report, I believe that a revised DSEIR is necessary to adequately analyze important impacts on the biological resources that this project will have:
  - As regards public access: UCI currently provides access control using fencing and unlocked gates. The DSEIR does not discuss design and alternatives for access, and unrestricted access would have negative impacts on habitat. This should be addressed in the DSEIR.
  - 86-2 • 2-18: Any trail at the "buffer/project" zone interface should be within the project area, as locating it within the buffer zone would violate the intent of the buffer zone. This needs to be designed and addressed in the DSEIR.
  - 86-3 • Lighting: the documented negative impacts of lighting on birds migrating at night is extensive and of great concern. There should be modelling of the effects of the potential Light Spill with this project so objective assessment is possible.
  - 86-4 • Glass: Window strikes are well documented to be a major cause of the decline in bird populations. Glare and type of glass material should be addressed in the DSEIR so that effects can be objectively assessed.
  - 86-5 • Biological Resources Surveys: These have been inadequate to document known presences in the project area of Coastal California Gnatcatchers, Least Bell's Vireos and White-tailed Kites, as well as nesting Western Pond Turtles.
  - 86-6 • Western Pond Turtle: the DSEIR is inaccurate in the assessment of this species. Barry Nerhus, in his Master Thesis for Cal State University of Long Beach (The Movements, Habitat Use and Population Assessment of Western Pond Turtles in a Southern California Seasonal Wetland),

86-6  
Cont'd

documented that this species uses the project area for nesting. The proposed mitigation measures will not detect the species or prevent "take". The connection to the trail system will interfere with the movement of the turtle between the pond area of SJFMR and the area required for nesting. There is a lack of details about the design elements of the trail preventing evaluation of this risk.

86-7

- **Once the project is completed**, there is no way to assess impacts of public access since this is not addressed. The proposed design does not include any elements to provide access control after the completion of construction. These should be included in the DSEIR so that impacts can be fully evaluated.

86-8

In conclusion, it is apparent that the current Draft SEIR is inadequate to address the very important aspects delineated above and should be revised and re-submitted.

Thank you for the opportunity to provide comments on this important project.

Sincerely,

Starlyn Howard

258 Calle Aragon Unit C,

Laguna Woods, California, 92637

949-390-4598

**Response to Letter 86: Starlyn Howard**

86-1 UCI does not concur that the Draft SEIR has deficient nor that a revised Draft SEIR is required to analyze impacts on biological resources on the Project Site (the Project Site includes both the Development Area and 150-foot Buffer Area). Recirculation of a revised draft EIR is required only where new information shows a new, significant impact; where new information shows a substantial increase in the severity of a project impact unless adopted mitigation reduces the impact to below significance thresholds, where new information shows that a feasible alternative or mitigation measure that is considerably different from those recommended in the EIR would lessen significant impacts of the project and the agency declines to adopt it, or the draft EIR was “so fundamentally and basically inadequate and conclusory in nature” that public comment was essentially meaningless. (*Laurel Heights Improvement Ass’n v Regents of Univ. of Cal.* (1993) 6 C4th 1112, 1130.) By contrast, recirculation is not required were new information added to the EIR clarifies or amplifies existing analysis, or makes less than significant modifications to an adequate EIR. (CEQA Guidelines § 15088.5.) No factors requiring recirculation are present here.

The proposed Project will not result in unrestricted public access to the Marsh nor result in other changes to public access to the Marsh area. There are no permanent building improvements proposed for the 150-Buffer Area, including bike or pedestrian trails. The Final SEIR has been revised to clarify that no trails will be located within the 150-foot Buffer Area. Improvements within the Buffer Area will be limited to water quality improvements to support UC San Joaquin Marsh Reserve habitat management, native landscaping to support habitat restoration and enhancement to benefit the Marsh, and temporary grading. These improvements will be planned, implemented, and managed in close consultation with UCI Nature biologists that oversee the management of the Marsh.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

86-2 Please see Response 85-1. Pedestrian or bicycle trails built as a part of the Project will be located within the Project Development Area and outside of the 150-foot Buffer Area and the Marsh. Barriers would be installed to prevent public access into the 150-foot Buffer Area and Marsh in order to preserve Marsh resources.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

86-3 Please see Response 11-15 regarding potential impacts on nighttime lighting.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

86-4 Please see Response 8-10 regarding the bird safe design features that UCI is incorporating into the Project design.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

86-5 Please see Response 8-1, 8-11, and 8-13 regarding biological surveys, including discussion on California Gnatcatcher, Least Bell's Vireo, White-tailed Kite, and Western Pond turtles.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

86-6 Please see Response 8-13 regarding potential impacts on the Western Pond turtle.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

86-7 The proposed Project will not result in unrestricted public access to the Marsh nor result in other changes to public access to the Marsh area. Access to the Marsh will remain restricted by the University to protect the research, teaching, and habitat management mission of the Marsh. Pedestrian or bicycle trails built as a part of the Project will be located within the Project Development Area and outside of the 150-foot Buffer Area and the Marsh. Barriers would be installed to prevent public access into the 150-foot Buffer Area and Marsh in order to preserve Marsh resources.

The UCI LRDP does include a pedestrian and bicycle trail network as a part of the programmatic LRDP circulation element, including proposed future trails systems that would serve the North Campus. Connections to future UCI or other public trail systems are not part of this Project and have not been designed, and therefore cannot be evaluated without speculation in the analysis of the Project-level SEIR.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

86-8 UCI does not concur that the Draft SEIR is inadequate to address the potential impacts described above. The comments raised in this letter have been responded to in the Responses above. The comments do not provide any substantial evidence of a deficiency in the Draft SEIR regarding impacts on biological resources.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

**Letter 87: Sandrine Biziaux**


---

**From:** Sandrine Biziaux <sbiziaux@yahoo.com>  
**Sent:** Monday, November 16, 2020 15:06  
**To:** Lindsey Hashimoto  
**Subject:** Irvine Campus Medical Complex Comments

Dear Lindsey,

I am a photographer, a birdwatcher and a member of the University Hills Community. I welcome the opportunity to be able to comment of the Irvine Campus Medical Complex Draft Subsequent Environmental Impact Report.

I believe that a revised DSEIR is necessary to adequately address important impacts on the biological resources that this project will have:

- 87-1 • Public access: UCI currently provides access control using fencing and unlocked gates. The DSEIR does not discuss design and alternatives for access, and unrestricted access would have negative impacts on habitat. This should be addressed in the DSEIR. The fragile habitat should not be accessible to the public.
- 87-2 • 2-18: Any trail at the "buffer/project" zone interface should be within the project area, as locating it within the buffer zone would violate the intent of the buffer zone. This needs to be designed and addressed in the DSEIR.
- 87-3 • Lighting: the documented negative impacts of lighting on birds migrating at night is extensive and of great concern. There should be modelling of the effects of the potential Light Spill with this project so objective assessment is possible.
- 87-4 • Glass: Window strikes are well documented to be a major cause of the decline in bird populations. Glare and type of glass material should be addressed in the DSEIR so that effects can be objectively assessed. The American Bird Conservancy provides an extensive list of architectural products that can be used

87-4  
Cont'd

for this kind of project to prevent collisions [Stop Birds Hitting Windows | American Bird Conservancy](#)



87-5

- Biological Resources Surveys: These have been inadequate to document known presences in the project area of Coastal California Gnatcatchers, Least Bell's Vireos and White-tailed Kites, as well as nesting Western Pond Turtles. White-tailed Kites are heavily relying on the area to hunt and survive. The report mentions the sighting of one California Gnatcatcher...this number is greatly under-estimated.

87-6

- Western Pond Turtle: the DSEIR is inaccurate in the assessment of this species. Barry Nerhus, in his Master Thesis for Cal State University of Long Beach (The Movements, Habitat Use and Population Assessment of Western Pond Turtles in a Southern California Seasonal Wetland), documented that this species uses the project area for nesting. The proposed mitigation measures will not detect the species or prevent "take". The connection to the trail system will interfere with the movement of the turtle between the pond area of SJFMR and the area required for nesting. There is a lack of details about the design elements of the trail preventing evaluation of this risk.

87-7

- **Once the project is completed**, there is no way to assess impacts of public access since this is not addressed. The proposed design does not include any elements to provide access control after the completion of construction. These should be included in the DSEIR so that impacts can be fully evaluated.

87-8 [ In conclusion, it is apparent that the current Draft SEIR is inadequate to address the very important aspects delineated above and should be revised and re-submitted.

Thank you for the opportunity to provide comments on this important project.

Sincerely,

Sandrine Scherson  
1 Zola Court  
Irvine, CA  
949 413 0297



**Response to Letter 87: Sandrine Biziaux**

87-1: Comment Letter 86 contains verbatim language as Comment Letter 86. Comment Letter 86 was responded to in full.

Please see Responses 86-1 to 86-8.

No changes or modifications to the SEIR have been made or are required as a result of this comment.

**Letter 88: Public Hearing Transcript**

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PUBLIC HEARING ON THE  
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT  
(SEIR)  
FOR THE  
IRVINE CAMPUS MEDICAL COMPLEX  
(ICMC)

MONDAY, OCTOBER 19, 2020  
VIA ZOOM WEB CONFERENCING PLATFORM

---o0o---

REPORTED VIA ZOOM BY:  
DEBORAH FUQUA, CSR #12948  
CERTIFIED STENOGRAPHIC REPORTER

1 APPEARANCES  
2 ---o0o---  
3  
4 ALBERTO SANDOVAL, Senior Director of Community  
5 Government Relations, University of  
6 California, Irvine  
7  
8 Lindsey Hashimoto, Senior Planner, University of  
9 California, Irvine Office of Campus Physical and  
10 Environmental Planning  
11  
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13 ---o0o---  
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1 Monday, October 19, 2020 5:30 p.m.  
2  
3 P R O C E E D I N G S  
4 ALBERTO SANDOVAL: All right, everyone,  
5 welcome to the public hearing of the UCI, Irvine Campus  
6 Medical Complex Project Draft Subsequent Environmental  
7 Impact Report, abbreviated as Draft SEIR.  
8 I'm Alberto Sandoval, Senior Director of  
9 Community Government Relations, and I'll be serving as  
10 tonight's hearing officer. Tonight's public hearing is  
11 being held in compliance with the California  
12 Environmental Quality Act to receive public comments  
13 regarding the proposed project.  
14 I will now open tonight's hearing. The agenda  
15 for tonight will include an overview of our virtual  
16 public hearing format; a summary of the project; a  
17 summary of the environmental analysis and process; and  
18 an opportunity for the public to provide verbal  
19 comments on the Draft SEIR.  
20 Next slide, please.  
21 Tonight's hearing will be held in a virtual  
22 format due to COVID-19 health and safety precautions.  
23 So I will begin by describing the systems we will use  
24 to ensure that all participants have an opportunity to  
25 provide oral comments if they wish to do so. We

1 recommend that participants join the meeting using the  
2 audio option on your computer. All participants are  
3 automatically muted.

4           Following tonight's presentation of the  
5 project's characteristics and SEIR process, if you wish  
6 to provide oral comment, we request that you use the  
7 "Raise Hand" tool that you will find on the menu on the  
8 bottom of your screen. If you're using a phone, you  
9 can press star "9" and raise your hand to notify us  
10 that you would like to speak. Commenters will be  
11 called on in the order that hands are raised. Please  
12 do not lower your virtual hand once raised, or you will  
13 lose your place in the queue.

14           Once you are called on, we will notify you to  
15 request that you unmute yourself. All comments  
16 received at tonight's hearing will be recorded and  
17 responded to in writing in the Final SEIR. The purpose  
18 of tonight's hearing is to listen to you. We will not  
19 respond to your comments or engage in dialog tonight  
20 regarding the project or environmental analysis in the  
21 Draft SEIR. As described in the Notice of Availability  
22 for the Draft SEIR, you also have the opportunity to  
23 provide written comments until November 16th, 2020.

24           If anyone needs assistance with the technology  
25 systems tonight, UCI staff are available to assist you.

1 You may ask for assistance by using the "Chat" button  
2 on the Zoom menu at the bottom of your screen. Please  
3 only use this function for assistance regarding Zoom.

4 Next slide, please.

5 We will begin with an overview of the proposed  
6 project's characteristics. UCI Health is UCI's  
7 healthcare arm, serving 3.3 million people in Orange  
8 County through our academic medical center in Orange  
9 and multiple outpatient service locations throughout  
10 the region.

11 Powered by discovery and innovation, UCI  
12 Health's vision is to advance individual and population  
13 health. The Irvine Campus Medical Complex project is  
14 aligned with UCI Health's strategic planning goals and  
15 objectives, including ensuring appropriate and adequate  
16 access to high quality health and wellness care to the  
17 Irvin-Newport Beach communities through a convenient  
18 location in central Orange County, leveraging the  
19 co-location of UCI Health research, teaching, inpatient  
20 and outpatient programs through a location on the  
21 Irvine Campus, developing a campus setting providing a  
22 full range of on-site health and wellness services.

23 The project is located on the UCI North Campus  
24 near the Jamboree Road and Birch Street intersection,  
25 which lies north of the site. To the south of the site

1 to accommodate chemotherapy infusions in addition to  
2 non-oncology infusions.

3           The proposed project would also include an  
4 approximately 1,400-space parking structure and a  
5 central utility plant to support the project.

6           Next slide, please.

7           Based on the project description,  
8 environmental setting, and the characteristics of the  
9 project site, the following environmental topics were  
10 analyzed in the Draft SEIR: Aesthetics, Air Quality,  
11 Biological Resources, Cultural Resources, Energy,  
12 Geology and Soils, Greenhouse Gas Emission, Hazards and  
13 Hazardous Materials, Hydrology and Water Quality, Land  
14 Use and Planning, Noise, Population and Housing, Public  
15 Services, Recreation, Transportation, Tribal Cultural  
16 Resources, and Utilities and Service Systems.

17           Next slide, please.

18           Regarding where we are in the SEIR process,  
19 the Notice Of Preparation was circulated for 30 days on  
20 February 28th to March 28th. And UCI held a scoping  
21 meeting on March 9th to obtain comments regarding what  
22 should be included in the scope of the SEIR. The Draft  
23 SEIR is now available for the 45 -- for the 45-day  
24 public review period which began on October 2nd and  
25 ends on November 16th, where we will be receiving



1 is the San Joaquin Marsh Reserve, managed by UCI as an  
2 open space resource for teaching and research.  
3 Existing UCI support services and research facilities  
4 are located east of the site, and undeveloped UCI open  
5 space lies west of the site.

6 The site location, with its connections to the  
7 adjacent UCI open space resources, provides  
8 opportunities for high quality open space connections  
9 for an environment that promotes healing and wellness.

10 Next slide, please.

11 The proposed project will build an integrated  
12 healthcare campus providing both inpatient and  
13 outpatient services to the community. The project  
14 includes an acute care hospital with up to 144  
15 inpatient beds, providing Oncology, Neurosciences,  
16 Orthopedics, Spine, General Medicine, Emergency, and  
17 Surgical services.

18 An Ambulatory Care Center of up to 225,000  
19 square feet would complement the Acute Care Hospital,  
20 providing outpatient services inclusive of Oncology,  
21 Neurosciences, Orthopedics, and Spine and would include  
22 medical exam rooms, outpatient surgery services and  
23 procedure rooms, 23-hour observation rooms, and  
24 diagnostic and imaging services. An Infusion Center  
25 would also be located within the Ambulatory Care Center

1 comments regarding the contents of the Draft SEIR.

2 Tonight is the public hearing where we will be  
3 receiving oral comments regarding the document. After  
4 the public review period, we will respond in writing to  
5 any written or oral comments received as part of the  
6 Response to Comments in the Final SEIR.

7 Approval of the project and adoption of the  
8 SEIR is tentatively scheduled for early 2021.

9 Next slide, please.

10 If you would like to submit a written comment  
11 on the Draft SEIR, you can email or mail comments to  
12 Lindsey Hashimoto at the address on the screen until  
13 November 16, 2020. In addition, the link to the Draft  
14 SEIR can be found on the UCI website at the link shown.  
15 We will leave this slide up for a moment, and we will  
16 put the slide back up after oral comment portion of  
17 this hearing.

18 Why don't we go to the next slide.

19 The purpose of this public hearing is to  
20 receive comments on the Draft SEIR. Any comments  
21 received tonight, UCI will respond in writing. We will  
22 not be engaging in a verbal dialog during tonight's  
23 hearing.

24 If you wish to speak, please raise your  
25 virtual hand either in the Zoom application or, if you

1 dialed in by phone, please press star "9." Please keep  
2 your comments to under three minutes. These comments  
3 are being transcribed by a court reporter, so you do  
4 not need to send in a written comment as well if you  
5 are speaking tonight.

6           When you do speak, please state your name and  
7 organization clearly at the beginning for the court  
8 reporter. Lindsey Hashimoto, Senior Planner in the UCI  
9 Office of Campus Physical and Environmental Planning,  
10 will now call on attendees that have indicated interest  
11 in providing oral comments tonight.

12           Lindsey?

13           LINDSEY HASHIMOTO: Thank you, Alberto.

14           Okay. I will open it up now for the oral  
15 comment period, and I will be calling out your names.  
16 So if you'd like to speak, please raise your hand.

17           So right now, I see Julie Coffey would like to  
18 speak. So Julie, I have sent you a request to unmute  
19 yourself, and you can begin speaking when you're ready.

20           JULIE COFFEY: Okay. Can you hear me okay?

21           LINDSEY HASHIMOTO: Yes, we can.

22           JULIE COFFEY: Yeah, so I'd first like to  
23 thank the Planning Department for such a thorough  
24 Draft EIR -- obviously these take a lot of work to  
25 produce -- and acknowledge the role the University has

1 played in the NCCP and the HCP. I am just speaking in  
2 my capacity as a private citizen. And I'll keep my  
3 comments relatively brief and then supply more in the  
4 written comments. But mostly I want to cover a broad  
5 context and then address specifics about species.

88-1

6 So as we know, we're in the midst of climate  
7 change and biodiversity loss crises [sic] driven by  
8 human activity. And we know that one of the top  
9 drivers of species extinction is habitat loss. And we  
10 also know that we need to store as much carbon as we  
11 can to avoid catastrophic effects of climate change.

12 So I think that's important context here  
13 because preserving open space gives us future  
14 resiliency in the face of climate uncertainty. So  
15 basically, it gives us options when faced with  
16 questions of where can species go when drought, fire,  
17 or sea level rise make their current habitat  
18 unsuitable. And also with people, open space can  
19 mitigate heat waves, periodic flooding, and impacts  
20 from climate change effects in urban areas.

88-2

21 So even heavily invaded grasslands do store  
22 carbon below ground in fire-resilient carbon  
23 sequestration. So I really just want to make sure that  
24 we acknowledge open space as an extremely valuable and  
25 increasingly rare commodity in coastal Orange County.

**88-2**  
Cont'd

1 And I think, as a top research institution, UCI should  
2 be at the forefront of fighting ecological loss and  
3 climate change by pioneering innovative approaches to  
4 the development. So that's kind of what I have to say  
5 on that.

**88-3**

6 And then, in terms of species-specific, I have  
7 concerns that have been talked about a lot in terms of  
8 the protection and adequacy of the 150-foot buffer  
9 zone. I'd just like to emphasize that, if this project  
10 moved forward in this location, the buffer needs to be  
11 a true buffer with no impacts from landscaping or human  
12 presence. And given the presence of threatened species  
13 like California gnat catcher and western pond turtle  
14 nesting in the buffer, we really want to be concerned  
15 about edge effects from this project, which could be  
16 significant.

**88-4**

17 That leads me to my last sort of point which  
18 is there's some missing data. So I know these reports  
19 typically don't use eBird data, but Sea and Sage  
20 Audubon has been collecting systematic surveys of this  
21 area for years and years. And so we know from their  
22 surveys that White-tailed Kites, which are currently  
23 listed as low probability of occurrence in the project  
24 area, do actually occur very frequently hunting in that  
25 area and have actually nested in willows adjacent to

**88-4  
Cont'd**

1 the project area. And similarly, the western pond  
2 turtle has nested right up against the coastal sage  
3 scrub grassland boundary, which is not reflected in  
4 this report. And I can include those data in my  
5 written comments.

**88-5**

6 And then the last sort of point I wanted to  
7 make is for the building structure itself, we want to  
8 mitigate edge effects. So bird-safe glass is one that  
9 comes to mind. It's a very reflective building, and  
10 one of the leading threats to birds is collisions with  
11 buildings. So using bird-safe glass would be a  
12 priority for me here, as well as making sure that trash  
13 is well kept out of wildlife's hands so we don't see a  
14 surge of raccoons, crows, and other species that can  
15 not only predate California gnat catcher nests but also  
16 the southwestern pond turtle nests.

**88-6**

17 Yeah, and so I just really want to emphasize  
18 the broader context of this property as an important  
19 climate change potential area and that it is occupied  
20 by a threatened species not necessarily reflected in  
21 the Environmental Impact Report.

22 So thanks for your time.

23 LINDSEY HASHIMOTO: Great. Thank you for your  
24 comment.

25 I don't see any other additional hands raised

1 at this time. All right. I see Sidika Killic would  
2 like to speak.

3 I have unmuted you, and you can begin speaking  
4 when you're ready.

5 SIDIKA KILLIC: Okay. Hello. Yes, my name is  
6 Sidika Killic. I'm a resident in Watermarke condo  
7 complex. I emailed three of my concerns prior to  
8 today's meeting, but I probably want to get into it a  
9 little bit more.

88-7

10 Most of my concerns are noise and traffic. As  
11 you know, our entrance and exit to Watermarke is from  
12 Carlson and Campus. So if the traffic and noise --  
13 ambulance, siren noise, and all of that -- going to be  
14 increased, that will impact us very adversely.

15 And the other issue is I only saw the noise  
16 study on Jamboree. But maybe I looked at it very  
17 quickly. I think we need to do a noise and traffic  
18 study for Carlson and Campus.

88-8

19 And also I didn't see any road closure planned  
20 -- because that's going to impact us very much. Maybe  
21 it will come later, but it's better if it's early, like  
22 now.

88-9

23 So those are the three of my concerns. And  
24 I'm naturally pivoting around where I live, which is  
25 Watermarke complex on the corner of Carlson, Campus,

**88-9**  
**Cont'd**

1 and maybe I can say Jamboree. So Carlson and Campus,  
2 noise, traffic, road closure, if you could please  
3 include more detailed study, I would appreciate it.  
4 Thank you.

5 LINDSEY HASHIMOTO: Okay. Thank you for your  
6 comment.

7 Is there any additional speakers that would  
8 like to raise their hands?  
9 (No response)

10 LINDSEY HASHIMOTO: Give us a few more  
11 seconds.

12 If anybody would like to speak, please raise  
13 your hand.

14 Sidika Killic would like to speak again.  
15 I will unmute you now.

16 SIDIKA KILLIC: Thank you. I was wondering  
17 how many people you have at the meeting right now.

18 LINDSEY HASHIMOTO: We currently have 17  
19 attendees at the meeting.

20 SIDIKA KILLIC: Okay. Thank you.

21 LINDSEY HASHIMOTO: Okay. Well, if anybody  
22 else would like to speak, please raise your hand.  
23 (No response)

24 LINDSEY HASHIMOTO: Okay. Well, if there are  
25 no further hands raised and nobody would like to speak



1 at this time, we can move on to closing out this public  
2 hearing.

3 Next slide, please.

4 Alberto?

5 ALBERTO SANDOVAL: Well, thank you to everyone  
6 who joined us this afternoon. This is the contact  
7 information for Lindsey. If you'd like to send her  
8 your written comments, you can reach her via snail mail  
9 at the address provided or via email at that email  
10 [indicating]. And make sure to visit the website  
11 listed there to view the Draft SEIR.

12 Any additional questions, please feel free to  
13 reach out to us, contact us, call us. But in the  
14 meantime, thank you for joining us tonight. This will  
15 close out this public hearing. Thank you for joining  
16 us.

17 (Whereupon, the proceedings concluded  
18 at 5:50 p.m.)

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1 STATE OF CALIFORNIA )  
2 COUNTY OF MARIN ) ss.  
3 I, DEBORAH FUQUA, a Certified Shorthand  
4 Reporter of the State of California, do hereby certify  
5 that the foregoing proceedings were reported by me, a  
6 disinterested person, via Zoom web conferencing and  
7 thereafter transcribed under my direction into  
8 typewriting and which typewriting is a true and correct  
9 transcription of said proceedings.  
10 I further certify that I am not of counsel or  
11 attorney for either or any of the parties in the  
12 foregoing proceeding and caption named, nor in any way  
13 interested in the outcome of the cause named in said  
14 caption.  
15 Dated the 11th day of November, 2020.  
16  
17   
18 DEBORAH FUQUA  
19 CSR NO. 12948  
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25

**Response to Letter 88: Public Hearing Transcript**

88-1 The SEIR evaluated greenhouse gas emissions in Section 3.7. Impacts from energy consumption are discussed in Section 3.5. Impacts on biological resources, including sensitive species, are discussed in Section 3.3.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

88-2 Please see Response 11-3 regarding carbon sequestration. It should be noted the area of the Project site where the development will be located is not designated as open space. The Project Site includes both a Development Area, where buildings and infrastructure will be located, and a Buffer Area, where no buildings, or pedestrian and bicycle circulation elements associated with the project will be located. As discussed on page 2-8 of the SEIR, the Project Site is located within the North Campus area designated for development in the 2007 LRDP. The 2007 LRDP identifies that the existing LRDP land use designations for the Project Site is Mixed Use–Commercial and Open Space – General. The Development Area is designated as Mixed Use–Commercial, which allows for the construction of facilities for Medical Office, General Office, Research and Development, Academic Uses, Commercial and Retail, Conference Facilities, Residential uses, and Clinical Uses. The Project is consistent with the intensity of development planned in the 2007 LRDP. The Development Area is separated from the UC San Joaquin Marsh Reserve by a 150-foot development Buffer Area established in the 2007 LRDP, which is designated as Open Space – General. As noted above, the Project will not be constructed in the Buffer Area.

With regard to fighting ecological loss, please see Response 8-2 regarding UCI’s participation in the Orange County NCCP/HCP program since 1996 with which it has been a Participating Landowner since 1996.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

88-3 There are no permanent building improvements proposed for the 150-foot Buffer Area, including bike or pedestrian trails. Improvements within the Buffer Area will be limited to water quality improvements to support UC San Joaquin Marsh Reserve habitat management, native landscaping to support habitat restoration and enhancement to benefit the Marsh, and temporary grading. These improvements will be planned, implemented, and managed in close consultation with UCI Nature biologists that oversee the management of the Marsh. Please see Responses 11-14 and 11-19 regarding impacts from edge effects. Mitigation Measures BIO-2 and BIO-4 requires preconstruction surveys for sensitive species identified on the Project site including California Gnatcatcher and Western Pond Turtle.

Mitigation Measure BIO-2 has been revised in the Final SEIR to include additional language regarding the specific steps that need be taken if Western Pond turtle, or any species not covered by the NCCP/HCP, is detected during preconstruction surveys. The revised mitigation measure includes, among other steps, that CDFW be consulted if the Western Pone Turtle is detected, that a Pond Turtle Avoidance and Minimization Plan be prepared by a qualified biologist, and that

exclusionary fencing be installed prior to construction to prevent turtles from entering the Project development site.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 88-4 Please see Response 11-6 regarding ebird data and Responses 11-7 and 11-8 regarding potential impacts on Western Pond turtle.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 88-5 Please see Responses 11-9 and 8-10 regarding the bird safe design features that UCI is incorporating into the building design. Please see Responses 11-21 and 11-22 regarding trash management at the Project site.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 88-6 UCI does not concur that the Project site is a climate change potential area. The Project Site and the development intensities proposed are included in the 2007 LRDP. No impacts on climate change were identified in SEIR. No impacts on threatened species were identified in the SEIR. Please also see Response 8-11.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 88-7 Please see Response 13-1 which address the commenters written comments on the same topics. The Draft SEIR discussed Traffic impacts in Section 3.15 of the SEIR. Potential impacts are found to be less than significant. Noise impacts are discussed in Section 3.11, Noise, of the Draft SEIR. Table 3.11-17 provides a summary of the noise analysis that was conducted on the roadways adjacent to the Project site, including Campus Drive and Carlson Avenue. The noise study concluded that the Project would result in a 0.1 or less dB increase in traffic noise levels. This is less than 3 dB noise threshold and changes less than 1 dB will not be discernible to local residents.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 88-8 Please see Response 13-1 regarding road closures.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

- 88-9 Please see Response 13-1 which address the commenters written comments on the same topics.

No changes or modifications to the SEIR for clarification purposes have been made or are required as a result of this comment.

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## 3.0 REVISIONS TO THE DRAFT SEIR TEXT

### 3.1 Introduction

The Revisions to the Draft SEIR Text Chapter presents minor corrections, clarifications, and revisions made to the Draft SEIR initiated by the Lead Agency (University of California Irvine (UCI)) based on comments received during the public review period by reviewing agencies and the public.

The changes represent minor clarifications or amplifications of the analysis contained in the Draft SEIR and do not constitute significant new information or change any of the conclusions in the Draft SEIR that, in accordance with the State CEQA Guidelines, Section 15088.5, would trigger the need to recirculate portions or all of the Draft EIR.

### 3.2 Description of Changes

New text is presented in double underline and deleted text in ~~striketrough~~. Text changes are presented in the page order in which they appear in the Draft EIR.

#### Chapter: Executive Summary

**For clarification purposes, page ES-3 was revised as follows:**

The text on page ES-3 has been revised to read: Service and deliveries would access the site from the West Access Drive. ~~Birch Street access~~

*This change was made in response to Comment 2-18.*

#### Project Description

**For clarification purposes page 2-16 has been revised as follows:**

##### Pedestrian

There are existing sidewalks on both sides of Campus Drive between Jamboree Road and Carlson Avenue. There are no existing sidewalks on Jamboree Road adjacent to the project site. However, the approved UCI Child Health Project would construct a sidewalk along the project site's frontage. As depicted on **Figure 2-7: Pedestrian and Bicycle Circulation**, the project will include walkways to provide connections to the proposed Jamboree sidewalk and joint use trail and connections through the site to the proposed joint-use trail identified in the LRDP. No trails will be located within the 150-foot development buffer. ~~at the project/buffer zone interface south of the project.~~

A conceptual cross section showing the interface between to the proposed trail and 150-foot development buffer has been added as Figure FSEIR-1 at the end of this chapter.

*This change was made in response to Comments 2-30 and 8-3.*

**For clarification purposes page 2-23 has been revised as follows:**

### Natural Gas

SoCal Gas provides natural gas service to the project area. The University of California restricts the use of natural gas for space and water heating for new buildings except for acute care hospitals in support of UCI climate protection goals and UC Sustainability Policy. As a part of the Project, a waiver would be submitted to the UC Regents to allow for the use of natural gas for the Central Utility Plant and Ambulatory Care Center. The project central plant will utilize electric heat-recovery chillers for all building space and water heating in lieu of natural gas combustion systems. Limited natural gas combustion may be used for code required medical instrument sterilization and/or humidification. Natural gas would be extended to the project site from existing off-site infrastructure.

*This change was made in response to Comment 8-9.*

## **Aesthetics**

**For clarification purposes, page 3.1-14 was revised as follows:**

**MM AES-1:** (This Mitigation Measure implements Mitigation Measure Aes 2A from the 2007 LRDP EIR) Prior to Project design approval for future projects that implement the 2007 LRDP, UCI shall ensure that the projects include design features to minimize glare impacts. These design features shall include use of non-reflective exterior surfaces and low-reflectance glass and bird-safe applications (e.g., double or triple glazing glass, high technology glass, low-E glass, or equivalent materials with low reflectivity) on all Project surfaces that could produce glare.

## **Biological Resources**

**For clarification purposes, page 3.3-19 was revised as follows:**

**MM BIO-1:** Prior to any ground-disturbing activities, a qualified botanist shall conduct a focused rare plant survey within the survey area to confirm the absence of special-status plant species, particularly but not limited to many-stemmed dudleya. The surveys shall be floristic in nature (i.e., identifying all plant species to the taxonomic level necessary to determine rarity), and shall be inclusive of, at a minimum, areas proposed for disturbance.

The results of the survey shall be provided to the County of Orange. If special-status plant species are found within the areas proposed for disturbance that are not already covered under the Orange County NCCP/HCP, measures to minimize impacts shall be implemented and, if impacts cannot be avoided and mitigation is required, it will be provided ~~to ensure CEQA compliance~~ in consultation with California Department of Fish and Wildlife and/or U.S. Fish and Wildlife Service until the impact is less than significant as determined by that agency. The surveys and reporting shall follow 2018 CDFW and/or 2001 CNPS guidelines.

**For clarification purposes, page 3.3-19 was revised as follows:**

**MM-BIO-2** - Prior to clearing, mowing, or ground-breaking activities, a qualified biologist shall conduct a focused wildlife clearance survey for special-status wildlife species with the potential to occur within the Project site, which includes least Bell's vireo, coastal California gnatcatcher, White tailed Kite, orange-throated whiptail, western mastiff bat, and western pond turtle. Focused surveys shall be inclusive of the entire survey area. Areas immediately adjacent to the San Joaquin Marsh Reserve at the southern area of the Project site have a higher potential to support least Bell's vireo and western pond turtle, areas immediately adjacent to CSS have a higher potential to support coastal California gnatcatcher, and the majority of the Project site provides potential habitat for orange-throated whiptail, and White tailed Kite. Exclusionary fencing for western pond turtle shall be erected along the edge of the limits of construction prior to any ground disturbing activities. In addition, all trees and buildings within and near the Project site should be surveyed for roosting bats such as western mastiff bat.

- If western pond turtle is detected in focused surveys, California Department of Fish and Wildlife (CDFW) shall be consulted. The qualified biologist shall submit a Pond Turtle Avoidance and Minimization Plan (Plan) to CDFW prior to ground disturbances. The Plan shall include complete avoidance and minimization measures (e.g., project timing, restrictions on grading date and location, exclusionary fencing and zones, trapping); and identification of suitable existing sites for relocation of pond turtles. The Plan shall be approved by CDFW, in writing, prior to ground disturbance.
- If western mastiff bat is detected in focused surveys, CDFW shall be consulted. To avoid direct mortality of western mastiff bats, any structure with potential bat habitat shall have temporary and humane bat exclusion devices installed under the supervision of the qualified biologist prior to the initiation of construction activities. Exclusion devices shall be installed between October 1 and November 30, within the 12-month period prior to construction to avoid trapping flightless young inside during the summer months or hibernating individuals during the winter. Exclusion shall be implemented selectively, and only to the extent necessary, to prevent morbidity or mortality to the bats. Exclusionary devices shall be removed at the end of construction or as otherwise authorized by CDFW.
- If special-status species not covered by the NCCP/HCP, are identified during clearance surveys prior to construction, a qualified biologist shall coordinate with CDFW and/or U.S. Fish and Wildlife Service (USFWS), as applicable, to determine measures to avoid and minimize impacts.

If special-status species not already covered by the NCCP/HCP are identified, on-site biologists shall be required to obtain, as applicable, Scientific Collecting Permits (SCP). A Species Relocation Plan may be appropriate to establish protocol for relocation of wildlife,



~~including guidelines for the SCP-holding biologist to capture unharmed and release found species in appropriate habitat an adequate distance from the project site, unless they are a CESA and/or ESA -listed species in which case coordination and direction from CDFW and/or the USFWS, respectively, shall be required. found within the project site at the time of construction that cannot move on their own, a qualified biologist shall coordinate with CDFW and/or USFWS, as applicable, to determine measures to avoid and minimize impacts and, if impacts cannot be avoided and mitigation is required, it will be provided to ensure CEQA compliance. However, based on the analysis conducted for this project, special-status species that are not covered by the Orange County NCCP/HCP are not expected to occur within the areas proposed for construction.~~

*This change was made based on comments 1-2, 8-12, and 8-13.*

**For clarification purposes, page 3.3-21 was revised as follows:**

**MM-BIO-4** Project construction activities involving ground disturbance or vegetation removal shall avoid the bird breeding season typically January through July for raptors and February through August for other avian species), if feasible. If breeding season avoidance is not feasible, a qualified biologist shall conduct a pre-construction nesting bird survey no less than 3 days prior to the commencement of any ground disturbing activities to determine the presence/absence, location, and status of any active nests on or adjacent to the survey area. The extent of the survey buffer area surrounding the site shall be established by the qualified biologist to ensure that direct and indirect effects to nesting birds are avoided.

In the event that active nests are discovered, a suitable buffer (distance to be determined by the biologist based on the specific species found to be nesting, but typical nest buffers are from 500 feet to 300 feet but can be smaller depending on the bird species) shall be established around such active nests, and no construction within the buffer shall be allowed, until the biologist has determined that the nest(s) is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest) or that it is safe to resume certain construction activities. Avoidance buffers may be reduced in size if a qualified biological monitor is present to observe the birds. The biological monitor must use best professional judgment to ensure that construction activities do not cause “take” (e.g., adults flushing off of a nest, fledglings changing behavior that could put them in harm, or any other form of disturbance).”

If special-status species not already covered by the NCCP/HCP, are found within the project site at the time of construction, a qualified biologist shall coordinate with California Department of Fish and Wildlife (CDFW) and/or U.S. Fish and Wildlife Service (USFWS), as applicable, to determine measures to avoid and minimize impacts.

## Section 3.4 Cultural Resources

For clarification purposes, page 3.4-12 was revised as follows:

**MM CUL-1** (This Mitigation Measure implements 2007 LRDP EIR MM Cul-1B) UCI shall prepare a Data Recovery Plan for the loss of this significant resource as a result of the site development. Prior to land clearing, grading, or similar land development activities for future projects that implement the 2007 LRDP and would impact a significant archaeological resource as determined by mitigation measure Cul-1A, a qualified archaeologist shall prepare and implement a data recovery plan. The plan shall include, but not be limited to, the following measures:

- i. Perform appropriate technical analyses;
- ii. File any resulting reports with the South Coastal Information Center; and
- iii. Provide the recovered materials to an appropriate repository for curation in consultation with a culturally-affiliated Native American.

The data recovery plan shall be consistent with the management requirements of Mitigation Measure TCR-1 with respect to the discovery of Tribal Cultural Resources.

**MM CUL-2** (This Mitigation Measure implements Mitigation Measure 1C from the 2007 LRDP EIR) Prior to land clearing, grading, or similar land development activities for future projects that implement the 2007 LRDP in areas of identified archaeological sensitivity, UCI shall retain a qualified archaeologist and a Native American Monitor to monitor these activities. In the event of an unexpected archeological or tribal cultural resource is discovered during grading, the on-site construction supervisor shall be notified and shall redirect work away from the location of the archaeological find. A qualified archaeologist and/or monitoring archaeologist and Native American monitor shall oversee the evaluation and recovery of archaeological resources, in accordance with the procedures below, after which the on-site construction supervisor shall be notified and shall direct work to continue in the location of the archaeological find. A record of monitoring activity shall be submitted to UCI each month and at the end of monitoring. If the archaeological discovery is determined to be significant, the archaeologist shall prepare and implement a data recovery plan. The plan shall include, but not be limited to, the following measures:

- i. Perform appropriate technical analyses;
- ii. File any resulting reports with the South Coastal Information Center; and
- iii. Provide the recovered materials to an appropriate repository for curation, in consultation with a culturally-affiliated Native American.

The data recovery plan shall be consistent with the management requirements of Mitigation Measure TCR-1 with respect to the discovery of Tribal Cultural Resources.

*These changes were made in response to Comment 9-1.*

## **Chapter 3.10 Land Use**

**For clarification purposes, page 3.10-3 was revised as follows:**

The ~~2016-2040~~ 2020-2045 *Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) was adopted in ~~April 2016~~ September 2020 (SCAG ~~2016-2020~~). Major themes in the ~~2016~~ 2020-2045 RTP/SCS include integrating strategies for land use and transportation; striving for sustainability; protecting and preserving existing transportation infrastructure; increasing capacity through improved systems managements; providing more transportation choices; leveraging technology; responding to demographic and housing market changes; supporting commerce, economic growth, and opportunity; promoting the links between public health, environmental protection, and economic opportunity; and incorporating the principles of social equity and environmental justice.

The RTP/SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce GHG emissions from transportation (excluding goods movement). Land use strategies to achieve the region's targets include planning for new growth around high-quality transit areas and livable corridors and creating neighborhood mobility areas to integrate land use and transportation and plan for more active lifestyles (SCAG 2020 ~~2016~~).

*This change was made in response to Comment 2-23.*

**For clarification purposes, page 3.10-4 was revised as follows:**

### **City of Irvine General Plan**

The City of Irvine General Plan was most recently updated in June of ~~2012~~ 2015 and is a comprehensive long term plan for development within the City. The General Plan also contains elements which address abroad range of issues including resource preservation, circulation, housing, noise, safety, etc. Specific to this section of the SEIR, the General Plan contains the Land Use element, which contains the general goal to “promote land use patterns which maintain safe residential neighborhoods, bolster economic prosperity, preserve open space, and enhance the overall quality of life in Irvine.” The Land Use Element consists of land use categories that guide future development and growth within the community, ranging from an office building or single-family home, to the number of parks and open space areas in the city. The proposed Project site is designated within the Land Use Element as Planning Area 29, which is identified as UCI-North Campus. Accordingly, the Project site is designated as ~~Education/Public Facilities~~ Educational Facilities and specifically labeled as UCI on the General Plan land use map. The areas adjacent to the Project site include additional UCI designated property to the west, Preservation area to the south, and UCI and Urban and industrial designations to the east. City of Newport Beach property is located across Jamboree Road to the northwest (City of Irvine, 2012).

*This change was made in response to Comment 2-24.*

**For clarification purposes, page 3.10-5 was revised as follows:**

### **City of Irvine General Plan Consistency**

The proposed Project is consistent with the City of Irvine General Plan and the land uses designated for Planning Area 29, which is identified as UCI – North Campus. In addition, the project site is designated as ~~Education/Public Facilities~~ Educational Facilities and specifically labeled as UCI on the General Plan map. Accordingly, ~~the proposed Project would be consistent with the public facilities designation as it would be a medical center and provide a public-serving use.~~

*This change was made in response to Comment 2-24.*

### **Section 3.11 Noise**

**For clarification purposes, page 3.11-28 was revised as follows:**

Cooling towers and exhaust fans will be located on the Ambulatory Care Center, and this equipment typically generates 64 dBA at 50 feet and 50 dBA at ~~50~~ 250 feet, respectively

*This change was made in response to Comment 2-27.*

### **Section 3.13 Public Services**

**For clarification purposed, page Chapter 3.13-3 was revised as follows:**

“OCFA is responsible for responding to emergencies that occur on the UCI campus. OCFA provides fire prevention/suppression and emergency services to ~~24~~ 23 cities in Orange County and all unincorporated areas and operates ~~79~~ 77 fire stations, 12 of which are serving the City of Irvine, UCI and JWA. OCFA is responsible for protecting ~~576~~ 587 square miles, including 190,822 acres of wildland, and over ~~1.8~~ 1.9 million residents (OCFA, July 1, 2020). OCFA Reserve Firefighters work 10 stations throughout Orange County. The City of Irvine, including the UCI Campus, falls within the service area of OCFA Division II, Battalions 5 and 10. OCFA’s adopted standard for response times is seven minutes and 20 seconds for 80 percent of emergency calls.”

*This change was made in response to Comment 5-4.*

**For clarification purposes, page 3.11-3 was revised.**

The City has a total of approximately ~~232~~ 243 officers and provides law enforcement to six different areas within the City of approximately 281,707 residents. This results in an officer to population ratio of approximately ~~1.21~~ 0.86 per 1,000. The proposed Project is within the University Area which serves the UCI campus and the communities of Rancho San Joaquin, Turtle Ridge, Turtle Rock, University Park, University Town Center, West Park Village 1, Bommer Canyon Open Space Preserve, Orchard Hills Open Space Preserve, and Quail Hill Open Space Preserve. The University Area is bordered by the I-405 on the north, SR-133 on the east, and SR-73 on the south. The University Area also includes the Irvine Business

Complex (IBC), which is bordered by the San Diego Creek on the east, Barranca Parkway on the north, SR-55 on the west, and MacArthur Boulevard on the south.

*This change was made in response to Comment 2-28.*

**For clarification purposed, page Chapter 3.13-7 was revised as follows:**

“To help reduce demands on OCFA services, the Project would be designed to comply with building and fire codes and include appropriate fire safety measures and equipment, including but not limited to, use of fire retardant building materials, inclusion of emergency water infrastructure (e.g., fire hydrants and sprinkler systems – including automatic fire sprinkler systems designed per NFPA 13 as required in the current CBC, CFC, and conformance to the CFC Appendix section/OCFA GuidelineB09, Attachment 23 related to hydrants and spacing), installation of smoke detectors and fire extinguishers, emergency response notification systems and provision of adequate emergency access including all weather access all around all buildings per OCFA Guidelines (B-09). Lastly, the proposed project would conform to all other CFC requirements, the OCFA Fire Master Plans for Commercial & Residential Development (B-09)Guideline, OCFA High-Rise Building (H-01) Guideline, and OCFA Architectural Review (E-04) Guideline. As such, with implementation of the proposed Project, the existing fire stations in the vicinity of the UCI campus would be adequate to meet the increases in demand for fire protection and emergency medical response services associated with the Project, and no additional new or physically altered facilities would be necessary.”

*This change was made in response to Comment 5-5.*

**For clarification purposes, page 3.11-8 was revised as follows:**

“The demand for IPD services would not be substantially increased by the introduction of the proposed medical commercial uses, and as discussed above, IPD rarely responds to calls within UCIPD jurisdiction as outlined by the 1999 Police Services Agreement but would be available if a large-scale emergency occurred. IPD serves a population of approximately 281,707 with approximately ~~232~~ 243 officers rendering an officer to population ratio of approximately ~~1.24~~ 0.86 per 1,000. IPD does not have any immediate or future plans to expand police facilities, and the proposed Project would not increase demand for the City’s police protection services that would require the construction of new facilities nor would it require the expansion of existing facilities that would result in physical environmental impacts.

The proposed Project would increase the number of jobs within the city of Irvine, which could result in population growth. It is anticipated most employees would already be living within the region and commute to the Project site; however, assuming all the new 950 employees moved to the City this would represent an approximate 0.03 increase in City population. This would indirectly result in an increase population and would slightly decrease the officer to population ratio by .014 (from ~~1.214~~ 0.862 to ~~1.218~~ 0.859). This is not considered a substantial decrease

because to maintain existing service ratios IPD would need to hire one police officer. It is reasonably anticipated a new officer would use the existing facilities and that this increase would not result in the need for new or expanded facilities the construction of which would result in impacts on the environment. The number of new employees, therefore, would not directly or indirectly result in impacts in this regard.”

*This change was made in response to Comment 2-28.*

## Section 3.16 Tribal Cultural Resources

For clarification purposed, page Chapter 3.16-6 was revised as follows:

### Mitigation Measures

The Project shall Implement Mitigation Measure TCR-1 and Mitigation Measures CUL-1, CUL-2, and CUL-3 from Section 3.4, Cultural Resources, of this SEIR.

**MM TCR-1:** If subsurface deposits believed to be cultural or human in origin, or tribal cultural resources, are discovered during construction all work shall halt within a 100-foot radius of the discovery, the Construction Manager shall immediately notify UCI Physical and Environmental Planning and Design & Construction Services. The Construction Manager shall also immediately coordinate with the tribal monitor and Project archaeologist meeting the Secretary of the Interior’s Professional Qualification Standards for archaeology and subject to approval by UCI to evaluate the significance of the find and develop appropriate management recommendations. All management recommendations shall be provided to UCI in writing for UCI’s review and approval. If recommended by the qualified professional and consulting tribes, and approved by UCI, this may include modification of the no-work radius.

The professional archaeologist and tribal monitors must make a determination, based on professional judgement and supported by substantial evidence, within one business day of being notified, as to whether or not the find represents a cultural resource or has the potential to be a tribal cultural resource. The subsequent actions will be determined by the type of discovery, as described below. These include: 1) a work pause that, upon further investigation, is not actually a discovery and the work pause was simply needed in order to allow for closer examination of soil (a “false alarm”); 2) a work pause and subsequent action for discoveries that are clearly not related to tribal cultural resources, such as can and bottle dumps, artifacts of European origin, and remnants of built environment features; and 3) a work pause and subsequent action for discoveries that are likely related to tribal cultural resources, such as midden soil, bedrock mortars, groundstone, or other similar expressions.

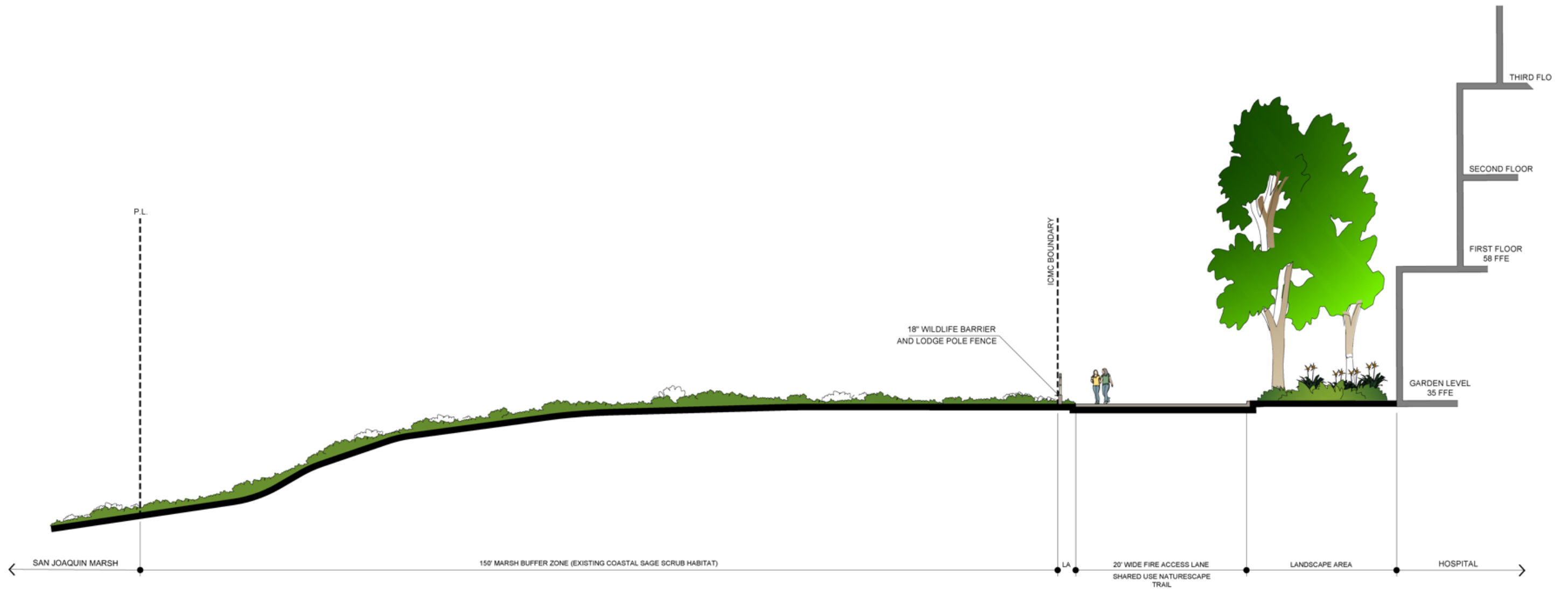
Whenever there is question as to whether or not the discovery represents a tribal resource, culturally affiliated tribes shall be consulted in making the determination. The following processes shall apply, depending on the nature of the find, subject to the review and approval of UCI:

- Response to False Alarms: If the professional archaeologist in consultation with the tribal monitor(s) determines that the find is negative for any cultural indicators, then work may

resume immediately upon notice to proceed from UCI's representative. No further notifications or tribal consultation is necessary, because the discovery is not a cultural resource of any kind. The professional archaeologist shall provide written documentation of this finding to UCI.

- Response to Non-Tribal Discoveries: If at the time of discovery a professional archaeologist and tribal monitor(s) determines that the find represents a non-tribal cultural resource from any time period or cultural affiliation, UCI shall be notified immediately, to consult on a finding of eligibility and implementation of appropriate treatment measures pursuant to Mitigation Measure CUL-1.
- Response to Tribal Discoveries: If the find represents a tribal or potentially tribal cultural resource that does not include human remains, the [tribe(s)] and UCI shall be notified. UCI will consult with the tribe(s) on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be either a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines, or a Tribal Cultural Resource, as defined in Section 21074 of the Public Resources Code. Preservation in place is the preferred treatment, if feasible. Work shall not resume within a 100-foot radius until UCI, through consultation as appropriate, determines that the site either: 1) is not a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines; or 2) not a Tribal Cultural Resource, as defined in Section 21074 of the Public Resources Code; or 3) that the treatment measures have been completed to its satisfaction.
- Response to Human Remains: If the find includes human remains, or remains that are potentially human, the construction supervisor or on-site archaeologist shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641) and shall notify UCI and the Orange County Coroner (per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California Public Resources Code, and Assembly Bill 2641 shall be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the Native American Heritage Commission (NAHC), which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the Public Resources Code). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. Public Resources Code § 5097.94 provides structure for mediation through the NAHC if necessary. If no agreement is reached, UCI shall rebury the remains in a respectful manner where they will not be further disturbed (§ 5097.98 of the Public Resources Code). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the Orange County Clerk's Office (AB 2641). Work shall not resume within the no-work radius until UCI, through consultation as appropriate, determines that the treatment measures have been completed to its satisfaction.

*This change was made in response to comment 9-1.*



Source: UCI, 2020

**Figure FSEIR-1: Conceptual Cross Section of Trail and Buffer Area Interface**



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## 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

### 4.1 Introduction

Section 15097 of the California Environmental Quality Act (CEQA) requires all State and local agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a “mitigated negative declaration” or specified environmental findings related to environmental impact reports.

The following is the Mitigation Monitoring and Reporting Program (MMRP) for the Irvine Campus Medical Complex Project. The intent of the MMRP is to ensure implementation of the mitigation measures identified within the Subsequent Environmental Impact Report (SEIR) for this project.

#### Compliance Checklist

The MMRP contained herein is intended to satisfy the requirements of CEQA as they relate to the Final SEIR prepared for the proposed project. This MMRP is intended to be used by University of California, Irvine (UCI) staff and mitigation monitoring personnel to ensure compliance with mitigation measures during project implementation. Mitigation measures identified in this MMRP were developed in the Final SEIR.

The Final SEIR presents a detailed set of mitigation measures that will be implemented throughout the lifetime of the project. Mitigation is defined by CEQA Guidelines, Section 15370, as a measure that:

- Avoids the impact altogether by not taking a certain action or parts of an action;
- Minimizes impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifies the impact by repairing, rehabilitating, or restoring the impacted environment;
- Reduces or eliminates the impact over time by preservation and maintenance operations during the life of the project; or
- Compensates for the impact by replacing or providing substitute resources or environments.

The intent of the MMRP is to ensure the implementation of adopted mitigation measures. The MMRP will provide for monitoring of construction activities as necessary and in-the-field identification and resolution of environmental concerns.

Monitoring and documenting the implementation of mitigation measures will be coordinated by UCI staff. The table attached to this report identifies the mitigation measure, the monitoring action for the mitigation measure, the responsible party for the monitoring action, and timing of the monitoring action. UCI staff will be responsible for monitoring compliance.

### **Mitigation Monitoring and Reporting Program**

The following table indicates the mitigation measure number, the impact the measure is designed to address, the measure text, the monitoring agency, implementation schedule, and an area for sign-off indicating compliance.

**Mitigation Monitoring and Reporting Program  
Irvine Campus Medical Complex**

Mitigation Measure	Implementation Phase	Enforcing Agency	Verification of Compliance		
			Initials	Date	Remarks
<b>AESTHETICS</b>					
<p><b>AES-1:</b> <i>(This Mitigation Measure implements Mitigation Measure Aes 2A from the 2007 LRDP EIR)</i> Prior to Project design approval for future projects that implement the 2007 LRDP, UCI shall ensure that the projects include design features to minimize glare impacts. These design features shall include use of non-reflective exterior surfaces and low-reflectance glass and bird-safe applications (e.g., double or triple glazing glass, high technology glass, low-E glass, or equivalent materials with low reflectivity) on all Project surfaces that could produce glare.</p>	Prior to approval of final building designs	UCI Design and Construction Services  UCI Physical and Environmental Planning			
<p><b>AES-2:</b> <i>(This Mitigation Measure implements Mitigation Measure Aes 2B from the 2007 LRDP EIR)</i> Prior to approval of construction documents for future projects that implement the 2007 LRDP, UCI shall approve an exterior lighting plan for each project. In accordance with UCI’s Campus Standards and Design Criteria for outdoor lighting, the plan shall include, but not be limited to, the following design features:</p> <ul style="list-style-type: none"> <li>i. Full-cutoff lighting fixtures to direct lighting to the specific location intended for illumination (e.g., roads, walkways, or recreation fields) and to minimize stray light spillover into adjacent residential areas, sensitive biological habitat, and other light-sensitive receptors;</li> <li>ii. Appropriate intensity of lighting to provide campus safety and security while minimizing light pollution and energy consumption; and</li> </ul>	Prior to approval of final building designs	UCI Design and Construction Services  UCI Physical and Environmental Planning			

**Mitigation Monitoring and Reporting Program  
Irvine Campus Medical Complex**

Mitigation Measure	Implementation Phase	Enforcing Agency	Verification of Compliance		
			Initials	Date	Remarks
iii. Shielding of direct lighting within parking areas, parking structures, or roadways away from adjacent residential areas, sensitive biological habitat, and other light-sensitive receptors through site configuration, grading, lighting design, or barriers such as earthen berms, walls, or landscaping.					
<b>AIR QUALITY</b>					
<b>AQ-1:</b> <i>(This mitigation measure implements Mitigation Measure Air-2B from the 2007 LRDP EIR)</i> Prior to initiating construction, UCI shall ensure that the project construction contract includes a construction emissions mitigation plan, including measures compliant with SCAQMD Rule 403 (Fugitive Dust), to be implemented and supervised by the on-site construction supervisor, which shall include, but not be limited to, the following BMPs:	Prior to any grading activities	UCI Design and Construction Services  UCI Physical and Environmental Planning			
i. During grading and site preparation activities, exposed soil areas shall be stabilized via frequent watering, non-toxic chemical stabilization, or equivalent measures at a rate to be determined by the on-site construction supervisor.					
ii. During windy days when fugitive dust can be observed leaving the construction site, additional applications of water shall be required at a rate to be determined by the on-site construction supervisor.					
iii. Disturbed areas designated for landscaping shall be prepared as soon as possible after completion of construction activities.					

**Mitigation Monitoring and Reporting Program  
Irvine Campus Medical Complex**

Mitigation Measure	Implementation Phase	Enforcing Agency	Verification of Compliance		
			Initials	Date	Remarks
<ul style="list-style-type: none"> <li>iv. Areas of the construction site that will remain inactive for three months or longer following clearing, grubbing and/or grading shall receive appropriate BMP treatments (e.g., revegetation, mulching, covering with tarps, etc.) to prevent fugitive dust generation.</li> <li>v. All exposed soil or material stockpiles that will not be used within 3 days shall be enclosed, covered, or watered twice daily, or shall be stabilized with approved nontoxic chemical soil binders at a rate to be determined by the on-site construction supervisor.</li> <li>vi. Unpaved access roads shall be stabilized via frequent watering, non-toxic chemical stabilization, temporary paving, or equivalent measures at a rate to be determined by the on-site construction supervisor.</li> <li>vii. Trucks transporting materials to and from the site shall allow for at least two feet of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer). Alternatively, trucks transporting materials shall be covered.</li> <li>viii. Speed limit signs at 15 mph or less shall be installed on all unpaved roads within construction sites.</li> <li>ix. Where visible soil material is tracked onto adjacent public paved roads, the paved roads shall be swept and debris shall be returned to the construction site or transported off-site for disposal.</li> <li>x. Wheel washers, dirt knock-off grates/mats, or equivalent measures shall be installed within the</li> </ul>					

**Mitigation Monitoring and Reporting Program  
Irvine Campus Medical Complex**

Mitigation Measure	Implementation Phase	Enforcing Agency	Verification of Compliance		
			Initials	Date	Remarks
construction site where vehicles exit unpaved roads onto paved roads.  xi. Diesel-powered construction equipment shall be maintained in accordance with manufacturer's requirements and shall be retrofitted with diesel particulate filters where available and practicable.  xii. Heavy-duty diesel trucks and gasoline-powered equipment shall be turned off if idling is anticipated to last for more than 5 minutes.  xiii. Where feasible, the construction contractor shall use alternatively fueled construction equipment, such as electric or natural gas-powered equipment or biofuel.  xiv. Heavy construction equipment shall use low NOx diesel fuel to the extent that it is readily available at the time of construction.  xv. To the extent feasible, construction activities shall rely on the campus's existing electricity infrastructure rather than electrical generators powered by internal combustion engines.  xvi. The construction contractor shall develop a construction traffic management plan that includes the following:  xvii. Scheduling heavy-duty truck deliveries to avoid peak traffic periods Consolidating truck deliveries.  xviii. Where possible, the construction contractor shall provide a lunch shuttle or on-site lunch service for construction workers.					

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<p>xix. The construction contractor shall, to the extent possible, use pre-coated architectural materials that do not require painting. Water-based or low VOC coatings shall be used that are compliant with SCAQMD Rule 1113. Spray equipment with high transfer efficiency, such as the high volume-low pressure spray method, or manual coatings application shall be used to reduce VOC emissions to the extent possible.</p> <p>xx. Project constructions plans and specifications will include a requirement to define and implement a work program that would limit the emissions of reactive organic gases (ROG’s) during the application of architectural coatings to the extent necessary to keep total daily ROG’s for each project to below 75 pounds per day, or the current SCAQMD threshold, throughout that period of construction activity to the extent feasible. The specific program may include any combination of restrictions on the types of paints and coatings, application methods, and the amount of surface area coated as determined by the contractor.</p> <p>xxi. The construction contractor shall maintain signage along the construction perimeter with the name and telephone number of the individual in charge of implementing the construction emissions mitigation plan, and with the telephone number of the SCAQMD’s complaint line. The contractor’s representative shall maintain a log of any public complaints and corrective actions taken to resolve complaints.</p>					



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<p><b>AQ-2</b> (This mitigation measure implements Mitigation Measure Air-2C from the 2007 LRDP EIR) UCI shall ensure that operational air emissions, including area sources, stationary sources, and vehicular emissions, are reduced to the extent possible via the following mitigation measures:</p> <p>i. UCI shall continue to implement and expand its alternative transportation program by continuing to assess new opportunities, programs, and technologies to reduce vehicular trips. This program shall consider the following elements:</p> <ul style="list-style-type: none"> <li>• Significant incentives aimed to expand UCI vanpool, carpool, and other ridesharing programs;</li> <li>• Significant incentives aimed to expand UCI public transit use off campus;</li> <li>• Promotion of Express Bus service in the campus vicinity and Express Bus service routes from key UCI commuter locations off campus;</li> <li>• Expansion of campus shuttle and other campus transit systems, including point-to-point shuttles with expanded routes and operations to key destinations, and coordination of the on-campus transit systems with existing and future public transit systems off campus to accommodate routes, transit stops, stations, and other programs and projects as deemed appropriate, including community transit programs in the City of Irvine and City of Newport Beach;</li> </ul>	<p>Prior to approval of final building designs and during building operation</p>	<p>UCI Design and Construction Services</p> <p>UCI Transportation and Distribution Services</p> <p>UCI Health</p> <p>UCI Physical and Environmental Planning</p>			

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<ul style="list-style-type: none"> <li>• Expansion of UCI bike programs and bicycle infrastructure, including expanded bikeways, BikePorts, and Bike Service Stations; and</li> <li>• Support of alternative transportation organizations.</li> </ul> <p>ii. All stationary sources shall comply with the applicable SCAQMD Rules and Regulations, including New Source Review, Best Available Control Technology, and source-specific requirements. Stationary sources shall employ state-of-the-art controls, where applicable, to reduce air emissions to the extent possible.</p> <p>iii. Emissions from area sources (e.g., cooling and heating systems, landscaping, consumer products, etc.) shall be reduced to the extent possible through implementation of UCI’s energy efficiency programs. Energy-saving measures include using central plant cooling and heating systems for buildings in the Academic Core; orienting buildings to the north for natural cooling and heating; implementing the UCI standard to exceed Title 24 energy efficiency by 20% or more; and increasing insulation in building walls and attics beyond Title 24 requirements.</p>					
<p><b>AQ-3:</b> UCI shall use diesel generators with U.S. EPA-certified Tier 4 engine or Engines that use CARB’s Level 3 Verified Diesel Emissions Control Strategy (VDECS). The VDECS procedure is described in Title 13, California Code of Regulations, Sections 2700-2710. Level 3 requires emissions to be reduced by at least 85 percent or to achieve</p>	Prior to any grading activities	UCI Design and Construction Services			

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PM emission levels of 0.01 grams per brake-horsepower-hour (g/bhp-hr) or less (NO <sub>x</sub> VDECS are classified by the percentage of NO <sub>x</sub> reduction achieved).		UCI Physical and Environmental Planning			
<b>BIOLOGICAL RESOURCES</b>					
<p><b>BIO-1:</b> Prior to any ground-disturbing activities, a qualified botanist shall conduct a focused rare plant survey within the survey area to confirm the absence of special-status plant species, particularly but not limited to many-stemmed dudleya. The surveys shall be floristic in nature (i.e., identifying all plant species to the taxonomic level necessary to determine rarity), and shall be inclusive of, at a minimum, areas proposed for disturbance.</p> <p>The results of the survey shall be provided to the County of Orange. If special-status plant species are found within the areas proposed for disturbance that are not already covered under the Orange County NCCP/HCP, measures to minimize impacts shall be implemented and, if impacts cannot be avoided and mitigation is required, it will be provided in consultation with California Department of Fish and Wildlife and/or U.S. Fish and Wildlife Service until the impact is less than significant as determined by that agency. The surveys and reporting shall follow 2018 CDFW and/or 2001 CNPS guidelines.</p>	Prior to any ground-disturbing activities	UCI Design and Construction Services  UCI Physical and Environmental Planning			
<p><b>MM-BIO-2:</b> - Prior to clearing, mowing, or ground-breaking activities, a qualified biologist shall conduct a focused wildlife clearance survey for special-status wildlife species with the potential to occur within the Project site, which</p>	Prior to any ground-disturbing activities	UCI Design and Construction Services			

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<p>includes least Bell’s vireo, coastal California gnatcatcher, White tailed Kite, orange-throated whiptail, western mastiff bat, and western pond turtle. Focused surveys shall be inclusive of the entire survey area. Areas immediately adjacent to the San Joaquin Marsh Reserve at the southern area of the Project site have a higher potential to support least Bell’s vireo and western pond turtle, areas immediately adjacent to CSS have a higher potential to support coastal California gnatcatcher, and the majority of the Project site provides potential habitat for orange-throated whiptail, White tailed Kite. Exclusionary fencing for western pond turtle shall be erected along the edge of the limits of construction prior to any ground disturbing activities. In addition, all trees and buildings within and near the Project site should be surveyed for roosting bats such as western mastiff bat.</p> <ul style="list-style-type: none"> <li>• If western pond turtle is detected in focused surveys, California Department of Fish and Wildlife (CDFW) shall be consulted. The qualified biologist shall submit a Pond Turtle Avoidance and Minimization Plan (Plan) to CDFW prior to ground disturbances. The Plan shall include complete avoidance and minimization measures (e.g., project timing, restrictions on grading date and location, exclusionary fencing and zones, trapping); and identification of suitable existing sites for relocation of pond turtles. The Plan shall be approved by CDFW, in writing, prior to ground disturbance.</li> <li>• If western mastiff bat is detected in focused surveys, CDFW shall be consulted. To avoid direct mortality of</li> </ul>		UCI Physical and Environmental Planning			

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<p>western mastiff bats, any structure with potential bat habitat shall have temporary and humane bat exclusion devices installed under the supervision of the qualified biologist prior to the initiation of construction activities. Exclusion devices shall be installed between October 1 and November 30, within the 12-month period prior to construction to avoid trapping flightless young inside during the summer months or hibernating individuals during the winter. Exclusion shall be implemented selectively, and only to the extent necessary, to prevent morbidity or mortality to the bats. Exclusionary devices shall be removed at the end of construction or as otherwise authorized by CDFW.</p> <ul style="list-style-type: none"> <li>If special-status species not covered by the NCCP/HCP, are identified during clearance surveys prior to construction, a qualified biologist shall coordinate with CDFW and/or U.S. Fish and Wildlife Service (USFWS), as applicable, to determine measures to avoid and minimize impacts to less than significant.</li> </ul> <p>If special-status species not already covered by the NCCP/HCP are identified, on-site biologists shall be required to obtain, as applicable, Scientific Collecting Permits (SCP). A Species Relocation Plan may be appropriate to establish protocol for relocation of wildlife, including guidelines for the SCP-holding biologist to capture unharmed and release found species in appropriate habitat an adequate distance from the project site, unless they are a CESA and/or ESA -listed species in</p>					

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which case coordination and direction from CDFW and/or the USFWS, respectively, shall be required.					
<b>BIO-3:</b> During construction, prior to the end of each work day, all open pipes and trenches shall be covered adequately to prevent wildlife from falling in and getting trapped. Prior to the start of construction each day, the construction site shall be checked, including vegetation, open pipes and trenches, and under staged vehicles, equipment, and materials. If species are found, measures adherent to mitigation measure MM BIO-2 for wildlife species shall be implemented.	Throughout construction	UCI Design and Construction Services  UCI Physical and Environmental Planning			
<b>BIO-4:</b> Project construction activities involving ground disturbance or vegetation removal shall avoid the bird breeding season (typically January through July for raptors and February through August for other avian species), if feasible. If breeding season avoidance is not feasible, a qualified biologist shall conduct a pre-construction nesting bird survey no less than 3 days prior to the commencement of any ground disturbing activities to determine the presence/absence, location, and status of any active nests on or adjacent to the survey area. The extent of the survey buffer area surrounding the site shall be established by the qualified biologist to ensure that direct and indirect effects to nesting birds are avoided.  In the event that active nests are discovered, a suitable buffer (distance to be determined by the biologist based on the specific species found to be nesting, but typical nest buffers are from 500 feet to 300 feet but can be smaller depending on the bird species) shall be established around	Three days prior to any ground-disturbing activities during the nesting season	UCI Design and Construction Services  UCI Physical and Environmental Planning			

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<p>such active nests, and no construction within the buffer shall be allowed, until the biologist has determined that the nest(s) is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest) or that it is safe to resume certain construction activities. Avoidance buffers may be reduced in size if a qualified biological monitor is present to observe the birds. The biological monitor must use best professional judgment to ensure that construction activities do not cause “take” (e.g., adults flushing off of a nest, fledglings changing behavior that could put them in harm, or any other form of disturbance).”</p> <p>If special-status species not already covered by the NCCP/HCP, are found within the project site at the time of construction, a qualified biologist shall coordinate with California Department of Fish and Wildlife (CDFW) and/or U.S. Fish and Wildlife Service (USFWS), as applicable, to determine measures to avoid and minimize impacts.</p>					
<b>CULTURAL RESOURCES</b>					
<p><b>CUL-1:</b> <i>(This Mitigation Measure implements 2007 LRDP EIR MM Cul-1B)</i> UCI shall prepare a Data Recovery Plan for the loss of this significant resource as a result of the site development. Prior to land clearing, grading, or similar land development activities for future projects that implement the 2007 LRDP and would impact a significant archaeological resource as determined by mitigation measure Cul-1A, a qualified archaeologist shall prepare and implement a data recovery plan. The plan shall include, but not be limited to, the following measures:</p>	<p>Prior to any ground-disturbing activities</p>	<p>UCI Design and Construction Services</p> <p>UCI Physical and Environmental Planning and Native American Consulting Tribes</p>			

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i. Perform appropriate technical analyses; ii. File any resulting reports with the South Coastal Information Center; and iii. Provide the recovered materials to an appropriate repository for curation in consultation with a culturally-affiliated Native American.  The data recovery plan shall be consistent with the management requirements of Mitigation Measure TCR-1 with respect to the discovery of Tribal Cultural Resources.					
<b>CUL-2:</b> <i>(This Mitigation Measure implements Mitigation Measure 1C from the 2007 LRDP EIR)</i> Prior to land clearing, grading, or similar land development activities for future projects that implement the 2007 LRDP in areas of identified archaeological sensitivity, UCI shall retain a qualified archaeologist and a Native American Monitor to monitor these activities. In the event of an unexpected archeological or tribal cultural resource is discovered during grading, the on-site construction supervisor shall be notified and shall redirect work away from the location of the archaeological find. A qualified archaeologist and/or monitoring archaeologist and Native American monitor shall oversee the evaluation and recovery of archaeological resources, in accordance with the procedures below, after which the on-site construction supervisor shall be notified and shall direct work to continue in the location of the archaeological find. A record of monitoring activity shall be submitted to UCI each month and at the end of monitoring. If the archaeological discovery is determined to be significant, the archaeologist shall prepare and implement	Prior to any ground-disturbing activities	UCI Design and Construction Services  UCI Physical and Environmental Planning  Native American Consulting Tribes			



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<p>a data recovery plan. The plan shall include, but not be limited to, the following measures:</p> <ul style="list-style-type: none"> <li>i. Perform appropriate technical analyses;</li> <li>ii. File any resulting reports with the South Coastal Information Center; and</li> <li>iii. Provide the recovered materials to an appropriate repository for curation, in consultation with a culturally-affiliated Native American.</li> </ul> <p>The data recovery plan shall be consistent with the management requirements of Mitigation Measure TCR-1 with respect to the discovery of Tribal Cultural Resources.</p>					
<p><b>CUL-3:</b> UCI shall continuously comply with the following: Any human remains encountered during Project ground-disturbing activities shall be treated in accordance with California Health and Safety Code Section 7050.5. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the County coroner has determined the manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative. Project personnel/construction workers shall not collect or move any human remains and associated materials. If the human remains are of Native American origin, the coroner must notify the NAHC within 24 hours of this identification. The NAHC will immediately identify a Native American most likely descendant to inspect the site and provide</p>	<p>During ground disturbing activities</p>	<p>UCI Design and Construction Services</p> <p>UCI Physical and Environmental Planning</p> <p>Native American Consulting Tribes</p>			

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recommendations within 48 hours for the proper treatment of the remains and associated grave goods.					
<b>GEOLOGY AND SOILS</b>					
<b>GEO-1:</b> <i>(This Mitigation Measure Implements Mitigation Measure CUL-4A from the 2007 LRDP EIR)</i> Prior to grading or excavation for future projects that implement the 2007 LRDP and would excavate sedimentary rock material other than topsoil, UCI shall retain a qualified paleontologist to monitor these activities. In the event fossils are discovered during grading, the on-site construction supervisor shall be notified and shall redirect work away from the location of the discovery. The recommendations of the paleontologist shall be implemented with respect to the evaluation and recovery of fossils, in accordance with mitigation measures Cul-4B and Cul-4C, after which the on-site construction supervisor shall be notified and shall direct work to continue in the location of the fossil discovery. A record of monitoring activity shall be submitted to UCI each month and at the end of monitoring.	Prior to and during any ground-disturbing activities	UCI Design and Construction Services  UCI Physical and Environmental Planning			
<b>GEO-2:</b> <i>(This Mitigation Measure Implements Mitigation Measure CUL-4B from the 2007 LRDP EIR)</i> If the fossils are determined to be significant, then mitigation measure Cul-4C shall be implemented.	During ground-disturbing activities if significant fossils are discovered	UCI Design and Construction Services  UCI Physical and Environmental Planning			

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<p><b>GEO-3:</b> <i>(This Mitigation Measure Implements Mitigation Measure CUL-4C from the 2007 LRDP EIR)</i> For significant fossils as determined by Mitigation Measure Cul-4B, the paleontologist shall prepare and implement a data recovery plan. The plan shall include, but not be limited to, the following measures:</p> <ul style="list-style-type: none"> <li>i. The paleontologist shall ensure that all significant fossils collected are cleaned, identified, catalogued, and permanently curated with an appropriate institution with a research interest in the materials (which may include UCI);</li> <li>ii. The paleontologist shall ensure that specialty studies are completed, as appropriate, for any significant fossil collected; and</li> </ul> <p>The paleontologist shall ensure that curation of fossils are completed in consultation with UCI. A letter of acceptance from the curation institution shall be submitted to UCI.</p>	<p>During ground-disturbing activities if significant fossils are discovered</p>	<p>UCI Design and Construction Services</p> <p>UCI Physical and Environmental Planning</p> <p>Paleontological Monitor</p>			
<b>GREENHOUSE GAS</b>					
<p><b>GHG-1:</b> Monitor emissions annually and acquire carbon offset credits to achieve and maintain carbon neutrality for Project operations consistent with the terms of UC Climate Protection Policy.</p> <p>As part of this mitigation measure, UCI is making the following separate, though overlapping, GHG emission reduction commitments: (1) Reduction of On-Site Energy Consumption; (2) As a CARB-covered entity, UCI will maintain compliance with CARB’s cap and trade program;</p>	<p>Prior to approval of final building designs for confirmation of sustainable energy systems and then annually for offsets credit compliance (beginning at end of</p>	<p>UCI Physical and Environmental Planning</p>			

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<p>(3) Per the Climate Action Plan and current UCI policy, UCI’s Scope 1 and Scope 2 GHG emissions shall, commencing in 2025, be entirely carbon-neutral; (4) Also per existing UC Policy, commencing in 2020, UCI’s Scope 1, Scope 2, and Scope 3 emissions from commuters and air travel shall meet 1990 emission levels; and (5) UCI shall achieve climate neutrality including Scope 3 sources (UCI commuters and University funded air travel) by 2050.</p> <p><b>Reduce On-Site Energy Consumption:</b> Before the acquisition of carbon offset credits, UCI shall minimize energy consumption to the extent feasible with on-site renewable energy generation. The ICMC shall be built with solar photovoltaic panels on the roofs of the proposed parking structures and installation of a future battery storage system. A hose bib shall be provided at the parking structure roof level to facilitate maintenance and washing of photovoltaic panels. If the Project’s renewable generation is not sufficient to offset the Project’s energy consumption, then UCI shall achieve an equivalent level of GHG emissions reductions to mitigate such shortfall, as described below.</p> <p><b>Compliance with CARB’s Cap and Trade Program:</b> Any carbon offset credits purchased for the purpose of compliance with CARB’s cap and trade program shall be purchased from an accredited carbon credit market. Such offset credits (or California Carbon Offsets) shall be registered with, and retired by an Offset Project Registry, as defined in 17 California Code of Regulations § 95802(a),</p>	<p>year 1 of building operations)</p>				

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<p>approved by the California Air Resources Board such as, but not limited to, Climate Action Reserve, American or Verra (formerly Verified Carbon Standard) approved by the California Air Resources Board and using protocols that are CARB-approved, as required in 17 Cal. Code Regs. § 95970 (a)(1)-(2). In order to demonstrate that the carbon offset credits provided are real, permanent, additional, quantifiable, verifiable, and enforceable, as those terms are defined in 17 California Code of Regulations § 95802(a), UCI shall document in its annual report: (i) the protocol used to develop those credits, and (ii) the third-party verification report concerning those credits. As and when the credits are retired, UCI shall document in its annual report the unique serial numbers of those credits showing that they have been retired.</p> <p><b>Compliance with UC Policy:</b> Compliance with UC’s policies for carbon neutrality by 2025 will be accomplished through reductions in direct emissions, the purchase of renewable electricity and possibly biomethane, and the purchase of carbon offset credits. UCI will purchase voluntary carbon offset credits as the final action to reach the GHG emission reduction targets. As part of the UC Carbon Neutrality Initiative, internal guidelines are being developed to ensure that any use of offsets for this purpose will result in additional, verified GHG emissions reductions from actions that align, as much as possible, with UC’s research, teaching, and public service mission. Specifically, any voluntary carbon offset credits used by UCI to mitigate GHG emissions will:</p>					

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<p>1. Be third-party verified by a major registry recognized by CARB such as the Climate Action Reserve (CAR).</p> <p>Be reported publicly and tracked through the Climate Registry (TCR) as required by UC policy. TCR is a non-profit organization governed by U.S. states and Canadian provinces and territories. UCI's TCR reports will be third-party verified and posted publicly.</p>					
<b>HAZARDS AND HAZARDOUS MATERIALS</b>					
<p><b>HAZ-1:</b> Prior to the start of any ground disturbance activities, UCI shall retain a licensed hazardous materials professional to further test the vapor encroachment conditions (VEC) on the Project site. If the licensed professional finds that VEC conditions do exist or are likely to occur, the licensed professional at the request of UCI and in consultation with the relevant regulatory agency, shall install a vapor mitigation system (such as a vapor barrier or other mechanism) in order to mitigate potential risks to human health and safety. The plan for implementation and remediation shall conform to all applicable local and state hazardous materials requirements. A complete report of all findings and any measures taken to reduce risk shall be submitted to the relevant regulatory agency for review.</p>	Prior to any ground-disturbing activities	<p>UCI Design and Construction Services</p> <p>UCI Physical and Environmental Planning</p>			
<p><b>HAZ-2:</b> Prior to the issuance of any grading plans, or approval of improvement plans in lieu of grading plans, UCI shall prepare a soil remediation and management plan for the Project site that has been approved by the</p>	Prior to approval of final building plans	UCI Design and Construction Services			

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<p>relevant regulatory agency. The soil remediation and management plan shall include a description of cleanup activities for any soil and soil vapor containing chemicals in concentrations exceeding cleanup goals established by the California Environmental Protection Agency California Human Health Screening Levels (CHHSLs) and the RWQCB Environmental Screening Levels (ESLs). Subject to regulatory agency approval, the clean-up activities shall include:</p> <ul style="list-style-type: none"> <li>• Investigation to define preliminary extents of contamination in soil and soil gas.</li> <li>• Preparation of Health Risk Assessment (HRA) for the on-site construction workers and future building occupants</li> <li>• Sampling and analysis plan (SAP) and methods to define preliminary soil excavation extents. The soil remediation and management plan SAP shall provide a dynamic process for defining the limits of contamination in soil at the Project site. This approach shall provide site-specific criteria for the soil removal/excavation plan and mitigating pollutants in soil vapor. The SAP shall define sampling objectives; present initial sampling locations rationale; describe field methods and procedures; present the analytical methods and procedures; and data reporting procedures.</li> </ul>		UCI Physical and Environmental Planning			

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<p><b>HAZ-3:</b> Prior to the start of any ground disturbance activities, UCI shall prepare a comprehensive assessment report, signed by a qualified environmental professional, documenting the presence or lack thereof of asbestos-containing materials (ACMs), lead-based paint, polychlorinated biphenyls (PCBs), and any other building materials or stored materials classified as hazardous materials by State or federal law. If lead-based paint, ACMs, PCBs, or any other building materials or stored materials classified as hazardous materials are present, the project applicant shall submit specifications prepared and signed by a qualified environmental professional, for the stabilization and/or removal of the identified hazardous materials in accordance with all applicable laws and regulations. UCI shall implement the approved recommendations for any proposed remedial action and required clearances by the applicable local, state, or federal regulatory agency.</p>	Prior to any ground-disturbing activities	UCI Design and Construction Services  UCI Physical and Environmental Planning			
<p><b>HAZ-4</b> <i>(This Mitigation Measure implements Mitigation Measure 6A from the 2007 LRDP EIR).</i> Prior to initiating on-site construction for future projects that implement the 2007 LRDP and that would involve a lane or roadway closure, the construction contractor and/or UCI Design and Construction Services shall notify the UCI Fire Marshal. If determined necessary by the UCI Fire Marshal, local emergency services shall be notified of the lane or roadway closure by the Fire Marshal.</p>	Prior to construction activities in which a lane or roadway closure is required	UCI Design and Construction Services  UCI Physical and Environmental Planning			

**HYDROLOGY AND WATER QUALITY**



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<p><b>HYD-1:</b> <i>(This Mitigation Measure implements Mitigation Measure HYD-2A from the 2007 LRDP EIR)</i> Prior to initiating on-site construction for future projects that implement the 2007 LRDP, UCI shall approve an erosion control plan for project construction. The plan shall include, but not be limited to, the following applicable measures to protect downstream areas from sediment and other pollutants during site grading and construction:</p> <ul style="list-style-type: none"> <li>i. Proper storage, use, and disposal of construction materials.</li> <li>ii. Removal of sediment from surface runoff before it leaves the site through the use of silt fences, gravel bags, fiber rolls or other similar measures around the site perimeter.</li> <li>iii. Protection of storm drain inlets on-site or downstream of the construction site through the use of gravel bags, fiber rolls, filtration inserts, or other similar measures.</li> <li>iv. Stabilization of cleared or graded slopes through the use of plastic sheeting, geotextile fabric, jute matting, tackifiers, hydro-mulching, revegetation (e.g., hydroseeding and/or plantings), or other similar measures.</li> <li>v. Protection or stabilization of stockpiled soils through the use of tarping, plastic sheeting, tackifiers, or other similar measures.</li> <li>vi. Prevention of sediment tracked or otherwise transported onto adjacent roadways through use of</li> </ul>	Prior to any ground-disturbing activities	UCI Design and Construction Services  UCI Physical and Environmental Planning			

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gravel strips or wash facilities at exit areas (or equivalent measures). vii. Removal of sediment tracked or otherwise transported onto adjacent roadways through periodic street sweeping. viii. Maintenance of the above-listed sediment control, storm drain inlet protection, slope/stockpile stabilization measures.					
<p><b>HYD-2:</b> <i>(This Mitigation Measure implements Mitigation Measure HYD-2B from the 2007 LRDP EIR)</i> Prior to initiating on-site construction for future projects that implement the 2007 LRDP, UCI result in land disturbance of 1 acre or more, the UCI shall ensure that the projects include the design features listed below, or their equivalent, in addition to those listed in mitigation measure HYD-3. Equivalent design features may be applied consistent with applicable MS4 permits (UCI’s Storm Water Management Plan) at that time. All applicable design features shall be incorporated into Project development plans and construction documents; shall be operational at the time of Project occupancy; and shall be maintained by UCI.</p> i. All new storm drain inlets and catch basins within the Project site shall be marked with prohibitive language and/or graphical icons to discourage illegal dumping per UCI standards. ii. Outdoor areas for storage of materials that may contribute pollutants to the storm water conveyance	Prior to approval of final building designs	UCI Design and Construction Services  UCI Physical and Environmental Planning			

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<p>system shall be covered and protected by secondary containment.</p> <p>iii. Permanent trash container areas shall be enclosed to prevent off-site transport of trash, or drainage from open trash container areas shall be directed to the sanitary sewer system.</p> <p>At least one treatment control is required for new parking areas or structures, or for any other new uses identified by UCI as having the potential to generate substantial pollutants. Treatment controls include, but are not limited to, detention basins, infiltration basins, wet ponds or wetlands, bio-swales, filtration devices/inserts at storm drain inlets, hydrodynamic separator systems, increased use of street sweepers, pervious pavement, native California plants and vegetation to minimize water usage, and climate-controlled irrigation systems to minimize overflow. Treatment controls shall incorporate volumetric or flow-based design standards to mitigate (infiltrate, filter, or treat) storm water runoff, as appropriate.</p>					
<p><b>HYD-3:</b> <i>(This Mitigation Measure implements Mitigation Measure HYD-1A from the 2007 LRDP EIR)</i> As early as possible in the planning process of future projects that implement the 2007 LRDP and would result in land disturbance of 1 acre or greater, and for all development projects occurring on the North Campus in the watershed of the San Joaquin Freshwater Marsh, a qualified engineer shall complete a drainage study. Design features and other recommendations from the drainage study shall be incorporated into project development plans and</p>	<p>Prior to approval of final building designs</p>	<p>UCI Design and Construction Services</p> <p>UCI Physical and Environmental Planning</p>			

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<p>construction documents. Design features shall be consistent with UCI’s Storm Water Management Program, shall be operational at the time of project occupancy, and shall be maintained by UCI. At a minimum, all drainage studies required by this mitigation measure shall include, but not be limited to, the following design features:</p> <p>Site design that controls runoff discharge volumes and durations shall be utilized, where applicable and feasible, to maintain or reduce the peak runoff for the 10-year, 6-hour storm event in the post-development condition compared to the pre-development condition, or as defined by current water quality regulatory requirements.</p> <p>Measures that control runoff discharge volumes and durations shall be utilized, where applicable and feasible, on manufactured slopes and newly-graded drainage channels, such as energy dissipaters, revegetation (e.g., hydroseeding and/or plantings), and slope/channel stabilizers.</p>					
<p><b>HYD-4:</b> Prior to occupancy of the Project, a qualified engineer shall demonstrate that a Conditional Letter of Map Revision (CLMOR) has been approved by the U.S. Federal Emergency Management Agency (FEMA) confirming the Project does not impede or adversely affect the 100-year floodplain.</p>	Prior to building occupancy	<p>UCI Design and Construction Services</p> <p>UCI Physical and Environmental Planning</p>			
<b>NOISE</b>					

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<p><b>NOI-1:</b> <i>(This mitigation measure implements Mitigation Measure Noi-1B from the 2007 LRDP EIR. This mitigation measure includes updates specific to the proposed Project and to reflect the latest practices and recommendations.)</i></p> <p>Prior to issuance of building permits, UCI shall ensure they are designed in a manner that would minimize the exposure of noise-sensitive land uses (i.e., campus housing, classrooms, libraries, and clinical facilities) to noise levels that exceed the following state noise standards: 60 dBA CNEL (single-family campus housing); 65 dBA CNEL (multifamily campus housing, dormitories, lodging); and 70 dBA CNEL (classrooms, libraries, clinical facilities). If the affected noise-sensitive land uses are already exposed to noise levels in excess of these standards, then the new or modified stationary noise sources shall not increase the ambient noise level by more than 3 dBA. These criteria shall be achieved by:</p> <p>i. Implementing the following noise reduction measures into the design of the satellite utility plant, as applicable:</p> <ul style="list-style-type: none"> <li>• Use low-speed fans, baffles, mufflers, or other mechanical system design features to reduce emitted noise;</li> <li>• Increase the distance from the noise source to sensitive receptors with setbacks;</li> <li>• Place equipment inside buildings or within solid enclosures;</li> </ul>	<p>Prior to approval of final building designs</p>	<p>UCI Design and Construction Services</p> <p>UCI Physical and Environmental Planning</p>			

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<ul style="list-style-type: none"> <li>• Construct earthen berms, noise walls, or other solid barriers for noise attenuation;</li> <li>• Eliminate glass, louvers, openings, or vents in the exterior walls of the plant, particularly those facing noise-sensitive land uses. If openings are necessary, install acoustical louvers or baffles on project components at all exterior openings;</li> <li>• Install silencers on the intake and exhaust system;</li> <li>• Place cooling towers as close to plant buildings as possible to utilize the buildings as noise barriers; and</li> <li>• Install integrated noise barriers on the sides of cooling towers.</li> </ul> <p>ii. Implementing the following noise reduction measures into the design of new major HVAC systems, as applicable:</p> <ul style="list-style-type: none"> <li>• Install acoustical shielding (parapet wall or near-field noise barrier) around all new equipment; and</li> <li>• Place equipment below grade in basement space.</li> </ul> <p>iii. Implementing the following noise reduction measures into the design of new parking structures:</p>					

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<ul style="list-style-type: none"> <li>• Incorporate architectural design features that attenuate noise including solid panels at locations facing noise-sensitive land uses; and</li> <li>• Construct earthen berms, noise walls, or other solid barriers between noise-sensitive land uses and parking structures.</li> </ul>					
<p><b>NOI-2:</b> <i>(This measure implements Mitigation Measure Noi-2A from the 2007 LRDP EIR. This mitigation measure includes updates specific to the proposed Project and to reflect the latest practices and recommendations.)</i> Prior to initiating ground-disturbing activities, UCI shall approve contractor specifications that include measures to reduce construction/ demolition noise to the maximum extent feasible. These measures shall include, but are not limited to, the following:</p> <ol style="list-style-type: none"> <li>i. Noise-generating construction activities occurring Monday through Friday shall be limited to the hours of 7:00 a.m. to 7:00 p.m., except during summer, winter, or spring break at which construction may occur at the times approved by UCI.</li> <li>ii. Noise-generating construction activities occurring on weekends in the vicinity of (can be heard from) off-campus land uses shall be limited to the hours of 9:00 am to 6:00 pm on Saturdays, with no construction occurring on Sundays or holidays.</li> <li>iii. Noise-generating construction activities occurring on weekends in the vicinity of (can be heard from) on-</li> </ol>	Prior to any ground-disturbing activities	UCI Design and Construction Services  UCI Physical and Environmental Planning			

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<p>campus residential housing shall be limited to the hours of 9:00 am to 6:00 pm on Saturdays, with no construction on Sundays or holidays. However, as determined by UCI, if on-campus residential housing is unoccupied (during summer, winter, or spring break, for example), or would otherwise be unaffected by construction noise, construction may occur at any time.</p> <p>iv. Construction equipment shall be properly outfitted and maintained with manufacturer recommended noise-reduction devices to minimize construction-generated noise.</p> <p>v. Stationary construction noise sources such as generators, pumps or compressors shall be located at least 100 feet from noise-sensitive land uses (i.e., campus housing, classrooms, libraries, and clinical facilities), as feasible.</p> <p>vi. Laydown and construction vehicle staging areas shall be located at least 100 feet from noise-sensitive land uses (i.e., campus housing, classrooms, libraries, and clinical facilities), as feasible.</p> <p>vii. All neighboring land uses that would be subject to construction noise shall be informed at least two weeks prior to the start of each construction project, except in an emergency situation.</p> <p>viii. Loud construction activity such as jackhammering, concrete sawing, asphalt removal, pile driving, and large-scale grading operations occurring within 600</p>					



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<p>feet of a residence or an academic building shall not be scheduled during any finals week of classes. A finals schedule shall be provided to the construction contractor.</p> <p>The Contractor shall comply with all Federal and State sound control and noise level rules, regulations, and ordinances which apply to any work performed pursuant to the contract. In addition, each internal combustion engine, used for any purpose on the job or related to the job, shall be equipped with a properly operating muffler of a type recommended by the manufacturer. No internal combustion engine shall be operated on the project without said muffler.</p>					
<b>TRAFFIC AND TRANSPORTATION</b>					
<p><b>TR-1:</b> <i>(This Mitigation Measure implements Mitigation Measure TRA-1I from the 2007 LRDP EIR)</i> UCI shall review individual projects proposed under the 2007 LRDP for consistency with UC Sustainable Transportation Policy and UCI Transportation Demand Management goals to ensure that bicycle and pedestrian improvements, transit stops, and other project features that promote alternative transportation are incorporated to the extent feasible.</p>	Prior to approval of final building plans	UCI Design and Construction Services  UCI Physical and Environmental Planning			
<p><b>TR-2:</b> <i>This Mitigation Measure implements Mitigation Measure TRA-1A from the 2007 LRDP EIR. This mitigation measure includes updates specific to the proposed Project and to reflect the latest practices and recommendations.)</i> To reduce on- and off-campus vehicle trips and resulting impacts, UCI will continue to implement a range of</p>	Prior to building occupancy and annually throughout building operation	UCI Transportation and Distribution Services  UCI Health			

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<p>Transportation Demand Management (TDM) strategies. Program elements will include measures to increase transit and shuttle use, encourage alternative transportation modes including bicycle transportation, implement parking policies that reduce demand, and implement other administrative mechanisms that reduce vehicle trips to and from the campus. Examples of trip reduction measures may include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• transportation marketing services,</li> <li>• short-term bicycle parking,</li> <li>• long-term bicycle parking,</li> <li>• improved access to bike network,</li> <li>• showers and locker rooms,</li> <li>• on-site café,</li> <li>• subsidized transit passes,</li> <li>• shuttle bus service,</li> <li>• carpooling program,</li> <li>• guaranteed ride home, and</li> <li>• parking cash-out program.</li> </ul> <p>UCI shall monitor the performance of TDM programs through annual surveys. The required items to be included in the annual progress report are:</p> <ul style="list-style-type: none"> <li>• contact information for the Project TDM coordinator,</li> <li>• sample of marketing materials provided to new employees about the TDM program,</li> <li>• number of employees participating in each TDM measure offered to employees,</li> </ul>		UCI Physical and Environmental Planning			

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<ul style="list-style-type: none"> <li>commute mode share of employees at the Project site, and</li> <li>other information demonstrating implementation of specific TDM measures.</li> </ul>					
<p><b>TR-3:</b> <i>(This Mitigation Measure implements Mitigation Measure TRA-1J from the 2007 LRDP EIR)</i> If a campus construction project or a specific campus event requires an on-campus lane or roadway closure, or could otherwise substantially interfere with campus traffic circulation, the contractor or other responsible party will provide a traffic control plan for review and approval by UCI. The traffic control plan shall ensure that adequate emergency access and egress is maintained and that traffic is allowed to move efficiently and safely in and around the campus. The traffic control plan may include measures such as signage, detours, traffic control staff, a temporary traffic signal, or other appropriate traffic controls. If the interference would occur on a public street, UCI shall apply for applicable permits from appropriate jurisdictions.</p>	Prior to construction activities in which a lane or roadway closure is required	UCI Design and Construction Services  UCI Physical and Environmental Planning			
<b>Tribal Cultural Resources</b>					
<p><b>TCR-1:</b> If subsurface deposits believed to be cultural or human in origin, or tribal cultural resources, are discovered during construction all work shall halt within a 100-foot radius of the discovery, the Construction Manager shall immediately notify UCI Physical and Environmental Planning and Design &amp; Construction Services. The Construction Manager shall also immediately coordinate with the tribal monitor and Project archaeologist meeting</p>	During ground-disturbing activities	UCI Design and Construction Services  UCI Physical and Environmental Planning			

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<p>the Secretary of the Interior’s Professional Qualification Standards for archaeology and subject to approval by UCI to evaluate the significance of the find and develop appropriate management recommendations. All management recommendations shall be provided to UCI in writing for UCI’s review and approval. If recommended by the qualified professional and consulting tribes, and approved by UCI, this may include modification of the no-work radius.</p> <p>The professional archaeologist and tribal monitors must make a determination, based on professional judgement and supported by substantial evidence, within one business day of being notified, as to whether or not the find represents a cultural resource or has the potential to be a tribal cultural resource. The subsequent actions will be determined by the type of discovery, as described below. These include: 1) a work pause that, upon further investigation, is not actually a discovery and the work pause was simply needed in order to allow for closer examination of soil (a “false alarm”); 2) a work pause and subsequent action for discoveries that are clearly not related to tribal cultural resources, such as can and bottle dumps, artifacts of European origin, and remnants of built environment features; and 3) a work pause and subsequent action for discoveries that are likely related to tribal cultural resources, such as midden soil, bedrock mortars, groundstone, or other similar expressions.</p> <p>Whenever there is question as to whether or not the discovery represents a tribal resource, culturally affiliated tribes shall be consulted in making the determination. The</p>		Native American Consulting Tribes			

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<p>following processes shall apply, depending on the nature of the find, subject to the review and approval of UCI:</p> <ul style="list-style-type: none"> <li>• Response to False Alarms: If the professional archaeologist in consultation with the tribal monitor(s) determines that the find is negative for any cultural indicators, then work may resume immediately upon notice to proceed from UCI’s representative. No further notifications or tribal consultation is necessary, because the discovery is not a cultural resource of any kind. The professional archaeologist shall provide written documentation of this finding to UCI.</li> <li>• Response to Non-Tribal Discoveries: If at the time of discovery a professional archaeologist and tribal monitor(s) determines that the find represents a non-tribal cultural resource from any time period or cultural affiliation, UCI shall be notified immediately, to consult on a finding of eligibility and implementation of appropriate treatment measures pursuant to Mitigation Measure CUL-1.</li> <li>• Response to Tribal Discoveries: If the find represents a tribal or potentially tribal cultural resource that does not include human remains, the [tribe(s)] and UCI shall be notified. UCI will consult with the tribe(s) on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be either a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines, or a Tribal Cultural Resource, as defined in Section 21074 of the Public Resources Code. Preservation in place is the preferred treatment, if feasible. Work shall not</li> </ul>					

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<p>resume within a 100-foot radius until UCI, through consultation as appropriate, determines that the site either: 1) is not a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines; or 2) not a Tribal Cultural Resource, as defined in Section 21074 of the Public Resources Code; or 3) that the treatment measures have been completed to its satisfaction.</p> <ul style="list-style-type: none"> <li>Response to Human Remains: If the find includes human remains, or remains that are potentially human, the construction supervisor or on-site archaeologist shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641) and shall notify UCI and the Orange County Coroner (per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California Public Resources Code, and Assembly Bill 2641 shall be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the Native American Heritage Commission (NAHC), which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the Public Resources Code). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. Public Resources Code § 5097.94 provides structure for mediation through the NAHC if necessary. If no agreement is reached, UCI</li> </ul>					

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shall rebury the remains in a respectful manner where they will not be further disturbed (§ 5097.98 of the Public Resources Code). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the Orange County Clerk’s Office (AB 2641). Work shall not resume within the no-work radius until UCI, through consultation as appropriate, determines that the treatment measures have been completed to its satisfaction.					