
University of California, Irvine
Medical Center

Long Range Development Plan

Final Environmental Impact Report

(SCH No. 2000021111)

Responses to Comments Received After
the Close of Public Comment Period

December 10, 2002

COMMENTS AND RESPONSES

The following comments were received after the close of the 45-day Public Comment period for the UCI Medical Center Long Range Development Plan Environmental Impact Report. The 45-day public review period began on October 18, 2002, and concluded at 5:00 p.m. on December 2, 2002. The following comments and University responses to these comments will be provided to The Regents of the University of California for consideration in approving the Long Range Development Plan and certification of the Environmental impact Report.

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

LIST OF LATE COMMENTS ON THE DRAFT EIR

Commenter	Reference Code	Page Numbers
State Agencies		
Department of Toxic Substances Control	G	2-4
Department of Transportation	I	14-16
County of Orange		
Planning & Development Services Dept.	H	5-13

Comments received on the University of California, Irvine Medical Center Long Range Development Plan Draft EIR after the close of the public comment period are reproduced in their entirety, followed by the University of California's response to each comment. For each comment letter, comments are numbered in marginal notes and are responded to individually.



Department of Toxic Substances Control



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Edwin F. Lowry, Director
5796 Corporate Avenue
Cypress, California 90630

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DEC 04 2002

UCI Campus & Environmental Planning

Gray Davis
Governor

November 26, 2002

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

NOTICE OF COMPLETION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER LONG RANGE DEVELOPMENT PLAN - SCH # 2000021111

Dear Mr. Demerjian:

The Department of Toxic Substances Control (DTSC) has received your Notice of Completion (NOC) of a draft Environmental Impact Report (EIR) for the above-mentioned Project.

Based on the review of the document, DTSC's comments are as follows:

- G-1 [1) The final EIR needs to identify and determine whether current or historic uses have resulted in any release of hazardous wastes/substances at the site.
- G-2 [2) The final EIR needs to identify any known or potentially contaminated sites within the proposed Project area. For all identified sites, the final EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- G-3 [3) The final EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation and the government agency to provide appropriate regulatory oversight.
- G-4 [4) If during construction of the project, soil and/or groundwater contamination is suspected, suspend construction in the area and implement appropriate Health and Safety procedures. If it is determined that contaminated soil and/or groundwater exist, the final EIR should identify how any required investigation and/or remediation will be conducted and which government agency will provide appropriate regulatory oversight.

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

Mr. Richard Demerjian
November 26, 2002
Page 2

G-5 [5) Any hazardous wastes/materials encountered during construction should be remediated in accordance with local, state, and federal regulations. Prior to initiating any construction activities, an environmental assessment should be conducted to determine if a release of hazardous wastes/substances exists at the site. If so, further studies should be carried out to delineate the nature and extent of the contamination. Also, it is necessary to estimate the potential threat to public health and/or the environment posed by the site. It may be necessary to determine if an expedited response action is required to reduce existing or potential threats to public health or the environment. If no immediate threat exists, the final remedy should be implemented in compliance with state regulations and policies rather than excavation of soil prior to any assessments.

G-6 [DTSC provides guidance for the Preliminary Endangerment Assessment (PEA) preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov.

If you have any questions regarding this letter, please contact Ms. Rania A. Zabaneh, Project Manager at (714) 484-5479.

Sincerely,



Haissam Y. Salloum, P.E.
Unit Chief
Southern California Cleanup Operations Branch
Cypress Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

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

- G-1** A discussion of current and historical uses at the UCIMC is contained in Section 3.5. Information regarding any accidental releases or spills is listed in Table 3.5-2 on page 3.5-8. The incidents listed in Table 3.5-2 either required no action, or remedial action was completed or deemed unnecessary.
- G-2** See Response to Comment G-1.
- G-3** Necessary actions for the investigation and remediation of any hazardous substances are detailed in Standard Conditions and Requirements for Impact 3.5-2 (SCAQMD Rule 1403) and in Mitigation Measures 3.5-2(a-d), 3.5-4(a-d), and 3.5-5(a-e).
- G-4** Necessary actions for the investigation and remediation of any hazardous substances that may be present in soil or groundwater are detailed in Mitigation Measure 3.5-5(a-e).
- G-5** See Response to Comment G-3.
- G-6** The comment is hereby noted.

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DEC 04 2002

UCI Campus & Environmental Planning THOMAS B. MATHEWS
DIRECTOR



County of Orange
Planning & Development Services Department

300 N. FLOWER ST.
SANTA ANA, CALIFORNIA

MAILING ADDRESS:
P.O. BOX 4048
SANTA ANA, CA 92702-4048

NL 02-129

December 2, 2002

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

SUBJECT: DEIR for the UCI Medical Center Long Range Development Plan (LRDP)

Dear Mr. Demerjian:

The above referenced item is a Draft Environmental Impact Report (DEIR) for the University of California, Irvine Medical Center (UCIMC). The proposed project will permit the development of approximately 1.9 million square feet, 527 hospital beds, and 4,200 parking spaces at the UCIMC, with an initial phase that includes a 254-bed replacement hospital.

The County of Orange has reviewed the DEIR and offers the following comments regarding the County's Juvenile Hall (JH) next to the UCIMC property:

H-1

The UCIMC development plan calls for an increase from 391 to 527 hospital beds, and a twofold- plus increase in related parking and support infrastructure to be built in three construction phases, beginning in Fall, 2003, and ending in 2008. Review of the DEIR indicates the Orange County Probation Department concerns fall into two broad categories: 1) safety/security related to placement of a seven-level, 1600 space parking structure adjacent to the JH security perimeter fencing and Units R and S; and 2) environmental issues specific to demolition of 16 existing structures and construction of new edifices.

H-2

1. Page 3.1-5; Section 3.1.6, Impact 3.1-1: "The proposed project would alter views from and of the site. Views from the Orange County Juvenile Hall of the parking structure are considered a significant visual impact." The proposed seven-level Parking Structure 1 with a capacity of 1600 vehicle spaces for employees, faculty, and staff at the UCIMC,

looms over the northern JH security fence. The second through seventh open floors of the structure provide a commanding and invasive view of all the JH living units; school buildings; open recreation spaces; and maintenance, warehouse, and kitchen operations. There is no public safety section in the document. Land Use sections in the DEIR also fail to address public safety issues that pose significant risk to the JH staff and minors. These include:

H-2

- A. Weapons, drugs, explosive devices, and other contraband could easily be dropped inside the Juvenile Hall perimeter/security fence from higher levels of Parking Structure 1.
- B. The parking structure provides cover and concealment behind concrete columns, guardrails, and parked vehicles, which may facilitate covert surveillance; aiding and abetting escape attempts; and/or targeting of staff and minors by a sniper.
- C. Glare from night lighting of the structure could hinder the Juvenile Hall surveillance camera system and disturb minors at night.
- D. The resident wards' potential loss of privacy and anonymity.

The project proponent should be required to ensure that the proposed development affords safety and security to Probation Department employees and resident minors from the aforementioned risks. The confidentiality and mandated anonymity of juvenile offenders must be protected. Proposed mitigation to achieve this protection will need to be designed and constructed in consultation with Orange County Probation Department (OCPD) and the County's Public Facilities and Resources Department (PFRD).

H-3

- 2. Page 3.1-6, Aesthetics: Phase I and full LRDP visual exhibits fail to provide any contiguous views from JH displaying proposed Parking Structure 1 and the 75,000 gross square foot modular building that border the northern perimeter of JH. The DEIR should contain Phase I and full LRDP exhibit views that impact JH. The seven-story parking structure would be visible from the adjacent one-story Juvenile Hall and the five-story Manchester Office Building. Page 3.1-7 identifies this as a significant impact. Mitigation measure 3.1-1 does not include possible options to reduce adverse visual impacts. These options include reduction of parking structure height, relocation of the structure, and visual buffering measures.

H-4

- 3. Pages 1-39, 2-25, Sections 3.11-1, 2.4.9; Phase 1 and Full LRDP Implementation: Transportation, Circulation, and Access: These sections fail to consider the significance of construction, patient care, and public traffic circulation on Dawn Way interfering with JH daily operations. Juvenile Hall's north sallyport and secured surface parking lots border on Dawn Way. Medical, court, and administrative transportation runs, along with repair staff and delivery, utilize this sallyport and account for approximately 30-40 in/out trips per day. Moving these functions to Juvenile Hall's south sallyport will significantly impact intake operations. The proposed development must not worsen existing traffic conditions that impact JH's north sallygate and surface parking. The UCIMC Phase I and LRDP displacement pose significant impact to the PH and Justice Center parking

- H-4 demand. Further, during Phase I the DEIR identifies approximately 4501 construction truck trips (2251 trips to and from the site) over a 14 to 18 week period. This averages 23 to 28 truck trips per day. However, the DEIR does not discuss the impact of this traffic on Dawn Way. We recommend the DEIR address the impact of construction related truck trips on daily JH operations along the Dawn Way corridor and north sallyport.
- H-5 4. Page 3.5-18, Section 3.5-4; Impact 3.5-4: This section states, “Demolition activities would result in short-term increases in hazardous waste generated on campus. This is considered a less than significant impact”. UCIMC construction-related emissions could include asbestos, lead, earthmoving dust, reactive organic compounds, and other particulate matter affecting air quality. The DEIR does not discuss construction-generated emissions as they relate to the open recreation yard at JH which is a sensitive receptor located adjacent to the demolition activities. This would impact JH daily outdoor recreational and work operations between the hours of 7:00am and 6:00pm. Disclosure notification to employees and parents of minors must be considered. The UCIMC LRDP has a responsibility to project, measure, monitor, and mitigate the effects of hazardous material levels on Probation Department employees and the resident JH minors.
- H-6 5. Pages 1-41, 1-43; Sections 3.12-1, 3.12-2, 3.12-5: These sections state the LRDP has less than significant impact on local electrical services, water supplies and natural gas demand. This includes an approximate .05% increase in water demand. The DEIR states that SCE and The Gas Company also indicate they will meet projected load growth. The DEIR does not address demand during construction phases nor does it offer analysis of potential casualties or emergency shortages. We require documented risk management contingency plans to incorporate procedures for potential casualties, service/supply failures, or shortages that may impact JH.
- H-7 6. Page 1-40; Impact 3.11-3: This section states, “The phase 1 project will result in a reduction in onsite parking, including during construction and demolition activities and for construction workers. With parking provided offsite, no significant impacts would result”. The DEIR fails take into account the proximity of the parking structure located south of Dawn Way, which provides for Probation Department and Justice Center visitors. Displaced UCIMC construction workforce, hospital employees, students, and visitors will utilize the Dawn Way parking structure. UCIMC Phase I and LRDP displacement pose significant impact to the JH and Justice Center parking demand.
- H-8 7. Sections 3.10.1, 3.10.2: Fire and Police Protection: The DEIR states impacts to Fire and Police services are considered not significant. The DEIR does not address security issues related to the JH. The DEIR also fails to consider the synergistic effect of the scope of Phase I and LRDP construction, UCIMC-generated traffic, and displacement of UCI staff, faculty, and patients, and its impact on the JH north sallyport and Dawn Way. The project proponent should be required to review and ensure fire and police emergency response can negotiate and access the JH’s northern boundaries and sallyport.

H-9

8. Page 3.8-9: Noise Levels: The DEIR identifies peak construction noise levels range from 75 to 80 dBA. This does not take into account the outdoor noise levels at the adjacent to the JH recreation yard. The EIR should provide analysis of outdoor noise levels during construction activities and implement mitigation measures to prevent short-term operational noise impacts on the JH.

H-10

Thank you for the opportunity to respond to the DEIR. If you have any questions, please contact Charlotte Harryman at (714) 834-2522.

Sincerely,

for 
Timothy Neely, Manager
Environmental Planning Services Division

ch

Response to Comment Letter H – County of Orange

H-1 The comment is hereby noted.

H-2 The comment addresses concerns with aesthetics, public safety and security resulting from the adjacency between the proposed parking structure in the northeast area of the Medical Center Site and indoor and outdoor facilities at the existing County of Orange Juvenile Hall. The comment requests that the University ensure that the proposed parking structure development afford safety and security to Juvenile Hall occupants, and that the Orange County Probation Department and County Public Facilities and Resources Department be consulted in the design and implementation of mitigation to reduce potential impacts resulting from the parking structure.

The LRDP includes a land use plan that identifies general land use zones and building sites. As identified in Exhibit 2-11 of the Draft EIR (DEIR) a general site for a parking structure is identified in the southeast area of the Medical Center Site. If the parking structure is implemented, specific building siting and design studies will be conducted. Mitigation Measure 3.1-1 describes options to be considered by the University when considering the specific siting and design of this LRDP facility that will reduce aesthetic impacts.

As described in Exhibit 2-11 the parking structure site is located directly north of the Juvenile Hall Building and northwest (i.e. nonadjacent) to the Juvenile Hall outdoor recreation yard. The parking structure will be set back approximately 60 feet from the southern property line. This setback area will include a two-lane roadway and landscaping. This would result in a minimum distance between the parking structure and Juvenile Hall Buildings that would exceed 100 feet. As a comparison, the City of Orange zoning ordinance requires a setback of 10 feet from the property line for a comparable facility in the local community. Therefore, the parking structure site provides a minimum setback that substantially exceeds the comparable local community standard.

The commentator notes the lack of a public safety section in the Draft EIR as well as public safety and security concerns that would result from implementation and operation of the parking structure. While there is no section in the DEIR dedicated solely to public safety, public safety issues are addressed in several sections of the DEIR. These include Hazardous and Hazardous Materials (Section 3.5) and Public Services (Section 3.10). Additionally, while the Land Use section (Section 3.7) does not discuss public safety issues, it does discuss and analyze the potential incompatibility of land use issues related to the proposed parking structure adjacent to the Orange County Juvenile Hall (Impact 3.7-2 on page 3.7-16).

Section 3.1 of the DEIR includes analysis of the aesthetics effects resulting from construction of the Parking Structure at this location. This analysis resulted in the determination that there would be a significant aesthetic impact on Juvenile Hall, with Mitigation Measure 3.1-1 identified to reduce the significance of this impact. As described in Mitigation Measure 3.1-1 (page 3.1-8 of the Draft EIR), the UCI Medical Center shall address and implement an option(s) to reduce these visual impacts associated with the seven-story parking structure adjacent to the Orange County Juvenile Hall facility. These include, but are not limited to, relocation of the parking

structure, reduction of parking structure height, and visual buffering of the uses. Because the mitigation measure includes the possibility of including other options, this mitigation measure can also be applied to the public safety issues discussed in Items A through D of this comment. These could include, but would not be limited to, such options as: (1) architectural screening or other barriers on the sides of the parking structure facing Juvenile Hall (2) additional setbacks or landscape buffers, (3) “stepping” of the parking structure to increase the setback of upper floors, (4) installing video/electronic surveillance systems, or (5) designing the night lighting so as to prevent disturbance to Juvenile Hall residents or hindrance to security systems.

As part of the implementation of Mitigation Measure 3.1-1 a consultation meeting involving representatives from Juvenile Hall/Orange County Probation Department, Orange County Public Facilities and Resources Department, and the UCI Medical Center will be scheduled by the University prior to initiating the design of the southeast parking structure. The purpose of this consultation meeting will be to identify measures that can be incorporated into the design of the parking structure to address aesthetics concerns and ensure the safety and security of Juvenile Hall staff, visitors, and resident minors to the maximum extent feasible as described above.

These options, or others discussed at the consultation meeting would further the following objectives: (A) prevent contraband from being dropped inside the Juvenile Hall property from the parking structure; (B) reduce the probability of escape attempts via the parking structure; (C) prevent glare from night lighting from disturbing the staff, residents, and camera systems; and (D) ensure residents’ privacy and anonymity.

Based on the analysis in the DEIR, and the additional information provided above, the finding that implementation of Mitigation Measure 3.1-1 will reduce Aesthetic Impact 3.1-1 to a level of Less than Significant will remain unchanged.

H-3 The comment addresses aesthetic impacts on the Juvenile Hall facilities and states that the DEIR should include specific visual simulations from the Juvenile Hall facilities for both Phase 1 (proposed Modular Building) and full LRDP implementation (southeast parking structure). The comment further states that Mitigation Measure 3.1-1 does not include possible options to reduce adverse visual impacts

The proposed modular building (Phase 1) and the southeast parking structure (full LRDP implementation) will be developed in general consistency with local planning and design standards. The proposed modular building will have a minimum setback of 60 feet from the property line and 100 feet from the Juvenile Hall Building. As described above, the southeast parking structure will conform to these the same setbacks (which exceed local City of Orange standards for similar facilities). The architectural character, materials, and colors of the buildings will be consistent with recently completed buildings in the vicinity of the Medical Center. These two proposed buildings will include high-quality perimeter landscaping consistent with local standards that will further reduce visual impacts.

Section 3.1.6 of the DEIR addresses impacts to views from Juvenile Hall. This analysis identifies a significant impact to views from the Juvenile Hall facility and identifies Mitigation Measure 3.1-1 to reduce these visual effects to a Level of Less than Significant. As described in Response to Comment H-2 above, Mitigation Measure 3.1-1

includes options identified to address aesthetic impacts. Although Section 3.1.6 does not include exhibits of visual simulations specifically from Juvenile Hall facilities, exhibits 3.1-4, 3.1-5, 3.1-6, and 3.1-7 provide visual simulations of proposed development in the southern area of the Medical Center, depicting future views from the vicinity of County of Orange Facilities at Dawn Way/City Drive and Interstate-5.

As described in Response H-2 implementation of Mitigation Measure 3.1-1 will include a consultation meeting for the purpose of identifying items that can be included in the project design that will address aesthetic and other effects on Juvenile Hall and adjacent facilities.

Based on the analysis in the DEIR and information provided above, the finding in the DEIR that Significant Impact 3.1-1 will be reduced to a Level of Less than Significant through the implementation of Mitigation Measure 3.1-1 will remain unchanged.

H-4 The traffic analysis contained in section 3.11 and Appendix F of the DEIR identifies impacts resulting from LRDP implementation to roadways within the study area including the intersection of Dawn Way and City Drive (referred to as “City Way at City Drive” in the DEIR). The LRDP Traffic Analysis found that a significant impact would occur at this intersection as a result of LRDP implementation and other local development. Mitigation Measure 3.11-4 identifies improvements that will reduce these impacts to a level of Less than Significant and identifies a funding mechanism for the University to fund its fair share of these improvements.

Section 3.11-4 of the DEIR describes potential impact on local circulation that could occur as a result of construction traffic. While this impact is identified as Less than Significant, Mitigation Measure 3.11-1 is identified to reduce these impacts. This Mitigation Measure requires coordination of construction traffic to minimize traffic conflicts on local roadways. Implementation of this mitigation measure will include consideration of impacts to the loading area and other circulation at Juvenile Hall. As a part of implementation of Mitigation Measure 3.11-1 the University will schedule a consultation meeting with the County of Orange Probation Department to discuss Juvenile Hall traffic activities and identify methods for construction traffic coordination.

H-5 The short-term exposure of people to asbestos-containing materials, lead based paint, and other hazardous substances is discussed in Impact 3.5-2 (page 3.5-15) and Impact 3.5-3 (page 3.5-17). While not specifically mentioned in that discussion, impacts to persons in the open recreation yard at the Juvenile Hall, adjacent to the demolition activities at the UCI Medical Center, would be the same as, or less than, those discussed in the Draft EIR as these off-site areas are further from the source of these materials. Additionally, as discussed in Mitigation Measures 3.5-2 and 3.5-3, a decommissioning plan for areas suspected of containing hazardous materials would be prepared and proper site preparation will be required for these areas in order to contain any hazardous materials. Development of the decommissioning plans will include evaluation of all sensitive receptors and other populations that could be impacted by demolition activities and will incorporate appropriate measures to protect health and safety of these individuals. With implementation of the mitigation measures listed above, the impact from demolition would be Less than Significant.

As a result of implementation of the mitigation measures listed above the impact to Probation Department employees and the Juvenile Hall resident minors from demolition would remain Less than Significant as described in the DEIR.

- H-6** The analysis in Section 3.12 of the DEIR identifies future demand for utility services and analyzes any potential impacts on the provision of these services to the project and surrounding community. Based on this analysis no significant impacts were identified for electrical service, water supply, or natural gas service. Utility Service demand during construction phases associated with implementing the LRDP would not exceed the overall demand figures identified in Section 3.12 of the DEIR, therefore there would be no additional impacts to Utility Services. Additionally, the UCI Medical Center “Emergency Preparedness Plan” (revised April 2001) has contingency plans for onsite casualties and emergency utility/service provide failures, and supply shortages. In response to the request in this comment for a documented risk management contingency plan, this document is available for your use at the UCI Medical Center by contacting Emergency Management Coordinator Scott Martin (714) 456-3491. As part of this emergency preparation and in addition to the Emergency Preparedness Plan, the UCI Medical Center maintains a system of back-up electrical generators in case of power failures. Consistent with State requirements these generators are tested on a regular basis. As such, it is not anticipated that an electrical failure specific to the UCI Medical Center would affect any other electrical users in the vicinity.
- H-7** The commenter raises a concern that inadequate parking supply at the Medical Center may result in Medical Center affiliates using the County of Orange Parking Structure located south of Dawn Way. Sections 2 and 3.11 of the DEIR describe parking supply and demand during project construction. As described in detail in response to comment D-19, adequate parking will be provided off-site during construction operations through the use of off-site parking facilities as listed in Table 2-12. As adequate parking supply will be provided to serve demand during construction, no impacts to the County of Orange Parking Structure were identified in the DEIR.
- H-8** The commenter notes that security issues related to fire and police access near Juvenile Hall are not addressed in the Draft EIR. The UCI Medical Center understands that fire and police services are essential to the continued safety and security of staff, visitors, and resident minors at the Juvenile Hall facility. As described Response to Comment H-4 Implementation of Mitigation Measure 3.1-1 will include consultation with County of Orange staff to identify methods for coordination of construction traffic to reduce the impacts on to vehicular circulation at County or Orange facilities.
- H-9** Section 3.8.5 of the DEIR provides analysis of potential noise impacts on adjacent uses, including Juvenile Hall. Potential construction noise impacts on Juvenile Hall were assessed in the same manner as if the facility was a typical residential area. This section identifies short-term outdoor noise impacts to Juvenile Hall Facilities that would result from construction activities. As described in this Section of the DEIR *“Activities occurring directly adjacent to the Juvenile Hall will generate significant noise levels at the facility. The majority of the activity will generate noise levels below 90 dBA with average noise levels in the 75 to 90 dBA range during periods of peak activities. Indoor noise levels will be approximately 12 dB lower for rooms with open windows and 20 dB lower for rooms with closed windows.”*

As described on pages 3.8-7 through 3.8-10 of the DEIR the threshold for significance for noise impacts includes compliance with the City or Orange Noise Ordinance. The City’s Noise Ordinance excludes control of noise generated by construction activities between 8:00 a.m. and 7:00 p.m. on weekdays and Saturdays. As construction activities near residential areas including Juvenile Hall will comply with these time restrictions, these activities will not result in a significant impact. While this impact was determined to be Less than Significant, Mitigation Measure 3.8-1 (a-e) identifies measures to reduce these noise impacts to the extent feasible, including the provision of noise barriers at locations where construction would be adjacent to sensitive receptors such as Juvenile Hall.

H-10 The comment is hereby noted.

DEPARTMENT OF TRANSPORTATION

DIVISION OF AERONAUTICS – M.S.#40

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DEC 06 2002

UCI Campus & Environmental Planning

November 27, 2002

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

Dear Mr. Demerjian:

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

I-1

The California Department of Transportation, Division of Aeronautics, reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to CEQA. The following comments are offered for your consideration.

I-2

The proposal is for the adoption of a Long Range Development Plan (LRDP) for the University of California, Irvine Medical Center (UCIMC). The UCI Medical Center has an existing heliport that operates with a State Heliport Permit issued by the Division of Aeronautics. According to Volume II of the Draft EIR, as part of the project, the heliport will be relocated to another part of the Medical Center grounds. Prior to relocating the heliport, please contact our Aviation Safety Officer for Orange County, Mark Aldridge, at (916) 653-9603 to discuss the need for a new State Heliport Permit. Any proposal to relocate the heliport should also be coordinated with the Orange County Airport Land Use Commission (ALUC).

I-3

As part of the permit process, the Division of Aeronautics, as Responsible Agency under CEQA, must ensure that the new heliport site is in full compliance with CEQA. Environmental documentation should thoroughly address heliport-related noise and safety impacts associated with the new site. We will require the opportunity to review and comment on all future environmental documentation for the heliport relocation.

I-4

Should the heliport remain at its current location, consideration should be given to whether any new structures in the vicinity of the heliport will penetrate existing helicopter approach/departure flight paths.

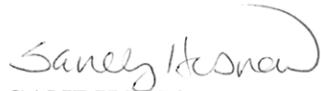
I-5

These comments reflect the areas of concern to the Division of Aeronautics with respect to airport-related noise and safety impacts and regional airport land use planning issues. We advise you to contact our district office concerning surface transportation issues.

Mr. Richard Demerjian, Director
November 26, 2002
Page 2

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-5314.

Sincerely,



SANDY HESNARD
Aviation Environmental Planner

c: State Clearinghouse, Joan Golding-Orange County ALUC

Response to Comment Letter I – California Department of Transportation, Division of Aeronautics

- I-1** The Comment is hereby noted.
- I-2** The heliport is not proposed to be relocated as a part of this project. If future relocation is considered, the UCI Medical Center will contact the Department of Transportation Aviation Safety Officer as requested.
- I-3** If the heliport is proposed to be relocated in the future, appropriate environmental documentation will be conducted as requested.
- I-4** Review of Exhibits 2-25 (Existing Facilities), Exhibit 2-24 (Phase 1 Completion), and Exhibit 2-11 (LRDP Planning Framework) in Volume 1 of the DEIR confirms that no new structures are proposed that would further encroach on the heliport approach/departure flight patterns. Please see Response to Comment D-11 (City of Orange) for a discussion of potential impacts from Helicopter operations related to two recently proposed residential projects within the City of Orange.
- I-5** The Department of Transportation District 12 provided a separate comment letter to the University dated November 26, 2002 that addresses surface transportation issues.