



NOTICE OF PREPARATION

May 11, 2007

To: Reviewing Agencies and Other Interested Parties

From: David Lepo, City of Newport Beach Planning Director

Subject: Hoag Memorial Hospital Presbyterian Master Plan Amendment

On April 15, 2005, the City of Newport Beach Planning Department (City) prepared an Initial Study for the Hoag Memorial Hospital Presbyterian (Hoag) project and determined that a Supplemental Environmental Impact Report (SEIR) was necessary. The Notice of Preparation (NOP), which included a copy of the Initial Study, was distributed for a 30-day review period. Since the NOP was distributed, certain modifications to the project have been proposed. The City has elected to prepare a revised NOP that outlines those changes and solicit input from responsible and trustee agencies and other interested parties regarding those changes. In summary, the changes are:

- a. The Applicant is no longer requesting an increase the maximum allowable building area on the Hoag Hospital site by 29,807 square feet (sf): 24,215 sf associated with the previously approved cogeneration facility and 5,592 sf associated with the vacation of an unused easement.
- b. The Applicant is requesting an amendment of the Development Agreement to eliminate the 55 dBA noise level restriction at the Hoag Hospital property line that is currently contained in the "Hoag Memorial Hospital Presbyterian Planned Community Development Criteria and District Regulations" (PC Text); and
- c. Indicate that noise generated from Hoag Hospital shall be governed by the City Noise Ordinance except as otherwise noted. These exceptions are related to noise standards at the Hoag Hospital property line adjacent to the loading dock and for the remainder of the property. These exceptions are addressed in this NOP and Initial Study.

Because an NOP for the project was previously distributed and comments have already been submitted to the City regarding the project, any comments submitted in response to this revised NOP should be limited to address only those changes to the project as described in this revised NOP. There is no need to resubmit the comments previously provided on the original NOP for those aspects of the project that have not changed.

The purpose of this notice is: (1) to serve as the NOP to "Responsible and Trustee Agencies and the State Office of Planning and Research," as required by the California Environmental Quality Act (CEQA) Section 15082 and (2) to advise and solicit comments and suggestions regarding the preparation of the SEIR; environmental issues to be addressed in the SEIR; and any related issues from interested parties other than potential "Responsible Agencies," including interested or affected members of the public. The City of Newport Beach, as Lead Agency, requests that any potential Responsible or Trustee Agency responding to this notice respond in a manner consistent with CEQA Guidelines Section 15082(b).

Pursuant to CEQA Section 21080.4, Responsible and Trustee Agencies must submit any comments in response to this notice not later than 30 days after receipt. The City will accept comments from others regarding this notice through the close of business, June 12, 2007.

All comments or other responses to this notice should be submitted in writing to:

James Campbell, Senior Planner
City of Newport Beach
Planning Department
3300 Newport Boulevard
Newport Beach, CA 92658-8915

The City of Newport Beach will also accept responses to this notice by e-mail received through the close of business, June 12, 2007. If e-mail comments are submitted with attachments, it is recommended that the attachments be delivered in writing to the address specified above. The virus protection measures and variety of formats for attachments can limit the ability for the attachments to be delivered. E-mail responses to this notice may be sent to: JCcampbell@city.newport-beach.ca.us.

Project Location

Hoag Memorial Hospital Presbyterian (Hoag) is an existing medical campus located at One Hoag Drive in the City of Newport Beach. The approximately 38-acre site, inclusive of the Lower Campus and Upper Campus, is generally bound by Hospital Road to the north, West Coast Highway to the south, Newport Boulevard to the east, and residential development and open space to the west. Superior Avenue is the closest major street to the west. Sunset View Park is a linear/consolidated park that extends along much of the northern boundary of the Lower Campus and separates the hospital from the Villa Balboa and Versailles at the Bluff condominium complexes. A regional location map, local vicinity map, and project site map are provided as Exhibits 1, 2, and 3, respectively.

Project Background

In 1992, the City of Newport Beach certified the Hoag Hospital Master Plan Final EIR No. 142 for the Hoag Hospital Master Plan and adopted the "Hoag Memorial Hospital Presbyterian Planned Community Development Criteria and District Regulations" (PC Text). In 1994, the City adopted Ordinance No. 94-8 approving "Development Agreement Between the City of Newport Beach and Hoag Memorial Hospital Presbyterian" (Development Agreement). The PC Text and the Development Agreement set forth the development standards and terms and conditions by which the Hoag Hospital site may be developed and include maximum permissible building area, building height limits, and permitted land uses.

The existing General Plan Land Use Element and the PC Text allows up to 1,343,238 square feet (sf) of medical facility and related uses on the Hoag Hospital site. Of the total 1,343,238 sf of allowable building area, 765,349 sf are allocated to the Upper Campus and 577,889 sf are allocated to the Lower Campus.

The PC Text does not specify building locations or specific building uses; however, permitted uses for each of the two campuses are listed in the PC Text. Permitted uses on the Lower Campus are categorized as Outpatient Services, Administration, Support Services, and Residential Care. Permitted uses on the Upper Campus are categorized as Hospital Facilities including Inpatient Uses, Accessory Uses, and Temporary Structures.

In 2002, the City Council approved the first amendment to the PC Text. The first amendment changed the definition of "Gross Floor Area Entitlement" so that certain non-occupied building areas are not counted toward the maximum permissible building floor areas for the project site.

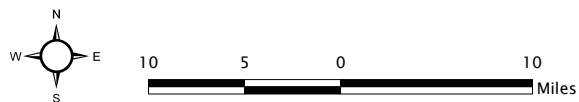


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Regional Location

Hoag Hospital Master Plan Amendment

Exhibit 1

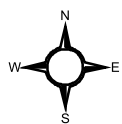


Bonterra
CONSULTING



Local Vicinity

Hoag Hospital Master Plan Amendment



0.3 0 0.3 0.6 Miles

Exhibit 2



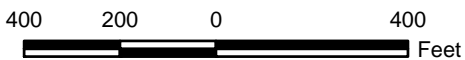
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Project Site

Hoag Hospital Master Plan Amendment

Exhibit 3



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Project Description

The proposed project requires amendments to the Development Agreement, General Plan, and PC Text.

Development Agreement Amendment

The amendment of the Development Agreement would do the following:

- (a) Eliminate the 55 dBA noise level restriction at the Hoag Hospital property line that is currently contained in the PC Text;
- (b) Allow up to 225,000 sf of authorized development to be transferred from the Lower Campus to the Upper Campus; and
- (c) Indicate that noise generated from Hoag Hospital shall be governed by the City Noise Ordinance except as otherwise provided in paragraphs 1, 2, and 3, below:
 1. The applicable noise standard at the Hoag Hospital property line adjacent to the loading dock shall be as follows:

	7 AM–10 PM Daytime	10 PM–7 AM Nighttime
Leq (15 min)	70 dBA	58 dBA

2. The applicable noise standard at the Hoag Hospital property line for the remainder of the property shall be as follows:

	7 AM–10 PM Daytime	10 PM–7 AM Nighttime
Leq (15 min)	65 dBA	58 dBA

3. Within the loading dock area, delivery vehicles and the loading and unloading of delivery vehicles, shall be exempt from any applicable noise standards.

General Plan Amendment

The current General Plan authorizes maximum allowable building areas of 765,349 sf for the Upper Campus and 577,889 sf for the Lower Campus, for a total of 1,343,238 sf. The amendment to the General Plan would allow up to 225,000 sf to be transferred from the Lower Campus to the Upper Campus. Under the proposed amendment, the General Plan would allow up to 577,889 sf of development in the Lower Campus and up to 990,349 sf in the Upper Campus provided the total square footage for the Upper and Lower Campus combined does not exceed 1,343,238 sf.

PC Text Amendment

The PC Text currently authorizes maximum allowable building areas of 765,349 sf for the Upper Campus and 577,889 sf for the Lower Campus, for a total of 1,343,238 sf. As noted above, to allow future flexibility in building placement while limiting the intensity of building on the Lower Campus, the proposed amendment to the General Plan Land Use Element would establish a maximum allowable building area on the Upper Campus of 990,349 sf and a maximum allowable building area on the Lower Campus of 577,889 sf. In no event, however, would the

total building areas of both the Upper and Lower Campuses exceed 1,343,238 sf. The PC Text would be amended to be consistent with this change.

The PC Text also includes a provision that noise generated from Hoag Hospital shall not exceed 55 dB at all Hoag Hospital property lines. This noise restriction would be eliminated and noise generated at Hoag Hospital would be governed by the City Noise Ordinance except as otherwise provided in paragraphs 1, 2, and 3, below:

1. The applicable noise standard at the Hoag Hospital property line adjacent to the loading dock shall be as follows:

	7 AM–10 PM Daytime	10 PM–7 AM Nighttime
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2. The applicable noise standard at the Hoag Hospital property line for the remainder of the property shall be as follows:

	7 AM–10 PM Daytime	10 PM–7 AM Nighttime
Leq (15 min)	65 dBA	58 dBA

3. Within the loading dock area, delivery vehicles and the loading and unloading of delivery vehicles, shall be exempt from any applicable noise standards.

In addition, the grease pit cleaning, which is exempt from the City Noise Ordinance as a maintenance activity, would occur on a Saturday between the hours of 11:00 AM and 3:00 PM.

Other minor revisions to the PC Text include general clarification of definitions and proposed uses, updating of references to completed activities, modification to the Building Area Statistical Analysis to establish square footage limitations, clean up existing exhibits to better reflect height limitations, and clarify and update the sign program and landscaping regulations.

Other changes may be required in the Hoag Hospital PC Text to reflect and be consistent with changes to the Development Agreement and General Plan indicated above and/or to provide clarification of standards applicable to future development approvals.

Use of a Supplemental EIR

The City of Newport Beach has determined that the proposed project requires the preparation of a Supplemental EIR (SEIR). CEQA Section 21166 provides that when an EIR has been prepared for a project pursuant to this division, no subsequent or supplemental EIR shall be required by the lead or responsible agencies unless one of these events occurs.

- (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report.
- (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.

- (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

This is reflected in CEQA Guidelines, Section 15162 which states that a Subsequent EIR is required if:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following: (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration; (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR; (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA Guidelines, Section 15163 allows a lead agency to prepare a supplement to an EIR when any of the conditions described in Section 15162 (stated above) would require the preparation of a Subsequent EIR, but only minor additions or changes are necessary to make a previous EIR adequately apply to the project in the changed situation. Section 15163(b) further states, "the supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised" and "the supplement may be circulated by itself without recirculating the previous draft or final EIR."

Anticipated Project Approvals

The City of Newport Beach would need to make the following project approvals as part of the current amendment requests:

- General Plan Amendment
- Planned Community Development Plan Amendment
- Development Agreement Amendment

In addition, prior to initiation of construction, other entitlements would be required. These include:

- Traffic Phasing Ordinance Analysis
- Coastal Development Permit (for development on the Lower Campus)
- Building Permits

- Grading Permit
- Water Quality Management Plan
- Storm Water Pollution Prevention Plan
- Demolition Permit

Additionally, the Development Agreement would need to be provided to the California Coastal Commission for review and approval; it should be noted that the California Coastal Commission was not a party to the original Development Agreement.

Future implementation of the project would require permits and/or approvals from the following agencies:

- California Coastal Commission
- California Office of Statewide Health Planning and Development (OSHPD)
- State Water Resources Control Board (for NPDES permits)
- South Coast Air Quality Management District

Anticipated Schedule

The project schedule, as currently envisioned, anticipates a Draft SEIR to Final EIR No. 142 to be available for public review in summer 2007. A 45-day public review period will be provided, after which responses to comments received will be prepared. A hearing before the Planning Commission and City Council are expected at the end of 2007. Master Plan implementation is expected to be phased through the year 2018.

Probable Environmental Effects of the Proposed Project

The SEIR will focus on those areas that may be affected by the proposed amendment to the Master Plan. The Final EIR will be relied upon for those topical areas where there have been no substantial changes since the previous EIR was certified and would not be affected by the proposed project. Topical areas to be addressed in the SEIR include:

- Aesthetics
- Air Quality
- Land Use
- Noise
- Transportation/Traffic

The attached Environmental Checklist identifies the evaluation of environmental issues that will be addressed in the SEIR.

Conclusion

The City of Newport Beach requests your careful review and consideration of this Notice of Preparation, and it invites any and all input and comments from interested agencies and persons regarding the preparation of the proposed SEIR.

ENVIRONMENTAL CHECKLIST FORM

- 1. **Project Title:** Hoag Memorial Hospital Presbyterian Master Plan Amendment
- 2. **Lead Agency Name and Address:** City of Newport Beach, 3300 Newport Boulevard, Newport Beach, California 92663
- 3. **Contact Person and Phone Number:** James Campbell, Senior Planner, 949-644-3210
- 4. **Project Location:** One Hoag Drive, Newport Beach, California 92663
- 5. **General Plan Designation:** Public Institutions
- 6. **Zoning Designation:** Hoag Hospital Planned Community (PC) Text and District Regulations
- 7. **Description of Project:** The project proposes amendments to the Development Agreement, General Plan, and PC Text.

Development Agreement Amendment

The amendment of the Development Agreement would do the following:

- (a) Eliminate the 55 dBA noise level restriction at the Hoag Hospital property line that is currently contained in the PC Text;
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The PC Text also includes a provision that noise generated from Hoag Hospital shall not exceed 55 dB at all Hoag Hospital property lines. This noise restriction would be eliminated and noise generated at Hoag Hospital would be governed by the City Noise Ordinance except as otherwise provided in paragraphs 1, 2, and 3, below:

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Other minor revisions include general clarification of definitions and proposed uses, updating of references to completed activities, modification to the Building Area Statistical

Analysis to establish square footage limitations, clean up existing exhibits to better reflect height limitations, and clarify and update the sign program and landscaping regulations.

Other changes may be required in the Hoag Hospital PC Text to reflect and be consistent with changes to the Development Agreement and General Plan indicated above and/or to provide clarification of standards applicable to future development approvals.

8. **Surrounding Land Uses and Setting:** The approximately 38-acre site, inclusive of the Lower Campus and Upper Campus, is generally bound by Hospital Road to the north, West Coast Highway to the south, Newport Boulevard to the east, and residential development and open space to the west. Superior Avenue is the closest major street to the west. Sunset View Park is a linear/consolidated park that extends along much of the northern boundary of the Lower Campus and separates the hospital from the Villa Balboa and Versailles at the Bluff condominium complexes.
9. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):** Approval of the amendments to the Hoag Hospital Planned Community Text would not necessitate approvals by other agencies. The Development Agreement would need to be provided to the California Coastal Commission for review and approval; it should be noted that the California Coastal Commission was not a party to the original Development Agreement.

Future implementation of the project would require permits and/or approvals from the following agencies:

- California Coastal Commission
- California Office of Statewide Health Planning and Development (OSHPD)
- State Water Resources Control Board (for NPDES permits)
- South Coast Air Quality Management District

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture Resources | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Land Use/Planning |
| <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Utilities/Service Systems | <input checked="" type="checkbox"/> Mandatory Findings of Significance | |

DETERMINATION:

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to be the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Printed Name

For

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

This checklist form is used to assist in evaluating the potential environmental impacts of the proposed project. The checklist form identifies potential project effects as follows: (1) Potentially Significant Impact; (2) Potentially Significant Unless Mitigation Incorporated; (3) Less Than Significant Impact; and, (4) No Impact. Substantiation and clarification for each checklist response is provided (Narrative Discussion commencing on page 14). Included in each discussion are mitigation measures, as appropriate, that are recommended for implementation as part of the proposed project.

ENVIRONMENTAL ISSUES (See attachments for information sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
II. AGRICULTURE RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL ISSUES (See attachments for information sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinances?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL ISSUES (See attachments for information sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS. Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VI. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL ISSUES (See attachments for information sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VIII. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL ISSUES (See attachments for information sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IX. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
X. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XI. NOISE. Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ENVIRONMENTAL ISSUES (See attachments for information sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. POPULATION AND HOUSING Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIII. PUBLIC SERVICES.				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire Protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police Protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIV. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XV. TRANSPORTATION/CIRCULATION. Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL ISSUES (See attachments for information sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XVI. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects??	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects and/or would the project include a new or retrofitted storm water treatment control Best Management Practice (BMP), (e.g. water quality treatment basin, constructed treatment wetlands), the operation of which could result in significant environmental effects (e.g. increased vectors and odors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL ISSUES (See attachments for information sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NARRATIVE DISCUSSION OF CHECKLIST EVALUATION

I. AESTHETICS—Would the Amendment to the Hoag Hospital Master Plan Project:

- a) Have a substantial adverse effect on a scenic vista?**
- c) Substantially degrade the existing visual character or quality of the site and its surroundings?**

Potentially Significant Unless Mitigation Incorporated. The Hoag Hospital Master Plan Final EIR No. 142 (1992) concluded that implementation of the Master Plan project in the Upper Campus would have no significant visual impact. Development in the Lower Campus area would have a “perceived significant impact for those residents who live to the north of the Lower Campus.” The Master Plan project was also determined to incrementally contribute to significant impacts associated with shade and shadow effects.

The existing PC Text allows up to 1,343,238 sf of medical facility and related uses on the Hoag Hospital site. Of the total 1,343,238 sf of allowable building area, 765,349 sf are allocated to the Upper Campus and 577,889 sf are allocated to the Lower Campus. As proposed, an amendment to the General Plan would allow up to 225,000 sf to be transferred from the Lower Campus to the Upper Campus. Under the proposed amendment, the General Plan would allow up to 577,889 sf of development in the Lower Campus and up to 990,349 sf in the Upper Campus. In no event could the total square footage for the Upper and Lower Campus exceed 1,343,238 sf.

Intensification of the development on the Upper Campus has the potential of changing the visual character of the site from that assessed in the Hoag Hospital Master Plan Final EIR No. 142. While no new significant impacts are anticipated, the Supplemental EIR (SEIR) will provide a discussion of the changes that would result with the intensification of the Upper Campus. The character of the existing aesthetic environment and visual resources, including a discussion of views within the site and views of the site from surrounding areas, will be identified. The visual assessment would be based on the anticipated levels of intensity, including maximum building heights (no changes in maximum building height are proposed as a part of the project), within the development areas of the site. No changes to setbacks are proposed. The compatibility of the project's height and intensity with the surrounding area will be assessed. Potential shade and shadow impacts will be determined where known.

Previously Adopted Mitigation Measures

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan amendment.

- 43.¹ Prior to issuance of grading permits, the Project Sponsor shall ensure that a landscape and irrigation plan is prepared for each building/improvement within the overall Master Plan. This plan shall be prepared by a licensed landscape architect. The landscape plan shall integrate and phase the installation of landscaping with the proposed construction schedule. The plan shall be subject

¹ Mitigation measure numbering reflects that provided in Resolution No. 92-43 for certification of Final EIR No. 142.

to review by the Parks, Beaches, and Recreation Department and approval by the Planning Department and Public Works Department.

45. Prior to issuance of a building permit, the Project Sponsor shall submit plans to the City Planning Department which illustrate that all mechanical equipment and trash areas will be screened from public streets, alleys and adjoining properties.
46. Prior to issuance of building permits, the Project Sponsor shall submit plans which illustrate that major mechanical equipment will not be located on the rooftop of any structure on the Lower Campus. Rather, such buildings will have clean rooftops. Minor rooftop equipment necessary for operating purposes will comply with all building height criteria, and shall be concealed and screened to blend into the building roof using materials compatible with building materials.
48. Prior to issuance of a building permit for any Lower Campus structure, the Project Sponsor shall prepare a study of each proposed building project to assure conformance with the EIR view impact analysis and the PCDD and District Regulations, to ensure that the visual impacts identified in the EIR are consistent with actual Master Plan development. This analysis shall be submitted to and approved by the City Planning Department.

Mitigation Measures No Longer Required

The following mitigation measure was adopted as a part of Final EIR No. 142 and has been implemented. This mitigation measure would no longer need to be tracked through mitigation monitoring.

116. The Project Sponsor shall pay 75% of the cost of planting thirty 24-inch ficus trees (or the equivalent) in the berm between the service road and Villa Balboa southerly of the tennis courts. Planting shall occur on Villa Balboa property.

Mitigation Measure 123 required screening devices for the windows of critical care/surgery that faced the Villa Balboa area. The critical care/surgery facility is not being implemented; therefore, this measure no longer applies. Should other uses be proposed in the location where the critical care/surgery facility would have been implemented, the site plan review process would identify the need for specific screening requirements. However, at the Master Plan level, this measure is no longer required.

123. The design of the critical care/surgery addition shall incorporate screening devices for the windows which face the Villa Balboa area for the purpose of providing privacy for residents, so long as these screening devices can be designed to meet the Hospital Building Code requirements regarding the provision of natural light to the facility.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The topography of the Upper Campus site has been modified from its original condition through grading and development of the site for the Hoag Hospital medical facilities. The Lower Campus is relatively flat and also has been developed with Hoag Hospital facilities. Hoag Hospital is located in an urbanized setting and the existing site has been developed with medical facilities, parking lots and structures, and related

facilities. The site is landscaped with ornamental plant materials. Coast Highway is not a designated State Scenic Highway.

- d) **Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

Potentially Significant Impact Unless Mitigation Incorporated. The Hoag Memorial Hospital Presbyterian Planned Community Development Criteria and District Regulations (adopted on May 26, 1992, as amended) notes that all “lighting systems shall be designed and maintained in such a manner as to conceal the light source and to minimize light spillage and glare to the adjacent residential uses.” Potential light and glare impacts, particularly with respect to building materials and exterior lighting, associated with the development of the project will be evaluated. Mitigation measures will be recommended to reduce potential aesthetic and light and glare impacts to the extent feasible.

Previously Adopted Mitigation Measures

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan Amendment.

44. Prior to issuance of a building permit, the Project Sponsor shall submit plans to, and obtain the approval of plans from, the City Planning Department which detail the lighting system for all buildings and window systems for buildings on the western side of the Upper Campus. The systems shall be designed and maintained in such a manner as to conceal light sources and to minimize light spillage and glare to the adjacent residential areas. The plans shall be prepared and signed by a licensed electrical engineer, with a letter from the engineer stating that, in his or her opinion, these requirements have been met.

II. AGRICULTURE RESOURCES—Would the Amendment to the Hoag Hospital Master Plan Project:

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

No Impact. The Hoag Hospital project site and the surrounding areas are located in an urbanized area and would not convert farmland to non-agricultural use. No portion of the project site is covered by a Williamson Act Contract or is located on land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance according to 2000 Natural Resource Conservation Service mapping. No agricultural resources impacts would occur and no mitigation is required. Therefore, the topic of Agricultural Resources will not be addressed in the Supplemental EIR.

III. AIR QUALITY—Would the Amendment to the Hoag Hospital Master Plan Project:

- a) Conflict with or obstruct implementation of the applicable air quality plan?**
- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?**
- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

Potentially Significant Impact. Hoag Hospital is within the South Coast Air Basin and is monitored by the South Coast Air Quality Management District (SCAQMD) and the California Air Resources Board. The South Coast Air Basin is a non-attainment area for ozone (O₃), carbon monoxide (CO), and fine particulate matter (PM₁₀). The project's short-term and long-term air quality emission levels and its consistency with applicable air quality management regulations and guidelines will be addressed in the SEIR.

As a part of the SEIR, an air quality analysis will be prepared describing existing conditions, including regional and local air quality and meteorology, and the State, federal, and regional air quality regulatory framework. The air quality analysis will address construction and operational impacts associated with the proposed project. The existing air environment will be described in terms of meteorology, local topography that affects pollutant dispersion, and ambient air monitoring data. A summary of current air management efforts, which may be related to the proposed project, will be provided with particular emphasis on the 2003 Air Quality Management Plan (AQMP), and the requirements for air quality assessments identified in the SCAQMD's CEQA Handbook. Sensitive receptor areas within the project vicinity will be identified.

Construction impacts are associated with the following activities: grading/excavation, debris removal, exhaust emissions from construction equipment, and employee vehicles. Although specific construction projects are not proposed as part of this amendment process, it is recognized that when development occurs demolition and construction activities would be associated with project implementation. Therefore, the SEIR will forecast the short-term dust and emissions generation due to demolition and construction activities. Measures to reduce dust generation are required by the South Coast Air Quality Management District. Additionally, measures are contained in the 2003 AQMP for control of construction activity emissions, and these also will be included in the list of mitigation measures.

Long-term emissions are associated with increased vehicular traffic and activities on the project site, including the combustion of natural gas and the generation of electricity (i.e., increasing the capacity of the cogeneration facility that serves the hospital). The analysis would compare regional and local impacts from the project with existing conditions and future conditions without the project, using current approved emission factors, traffic estimates, and methodologies. Project-specific and cumulative impacts will be identified using SCAQMD recommended significance thresholds for air quality impacts. A detailed discussion of the consistency of the project with the AQMP will be included. Measures will be developed to reduce significant air quality impacts to the extent possible.

Previously Adopted Mitigation Measures

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan Amendment.

37. Prior to the issuance of grading and building permits for each phase of development, the project proponent shall provide evidence for verification by the Planning Department that energy efficient lighting has been incorporated into the project design.
- 82.² Before the issuance of building permits, the Project Sponsor shall submit plans to the Building Department, City of Newport Beach demonstrating compliance with all applicable District Rules, including Rule 401, Visible Emissions, Rule 402, Public Nuisance, and Rule 403, Fugitive Dust.
88. The Project Sponsor shall submit plans to the City Building Department prior to the issuance of a building permit for each phase of development, verifying that energy efficiency will be achieved by incorporating appropriate technologies and systems into future structures, which may include:
 - High efficiency cooling/absorption units
 - Thermal storage and ceramic cooling towers
 - Cogeneration capabilities
 - High efficiency water heaters
 - Energy efficient glazing systems
 - Appropriate off-hour heating/cooling/lighting controls
 - Time clocks and photovoltaic cells for lighting controls
 - Efficient insulation systems
 - Light colored roof and building exteriors
 - PL lighting and fluorescent lighting systems
 - Motion detector lighting controls
 - Natural interior lighting—skylights, clerestories
 - Solar orientation, earth berming and landscaping
89. The Project Sponsor shall demonstrate to the City Building Department that methods and materials which minimize VOC emissions have been employed where practical, available and where value engineering allows it to be feasible.
96. Prior to issuance of a building permit, the Project Sponsor shall demonstrate to the City that the thermal integrity of new buildings is improved with automated time clocks or occupant sensors to reduce the thermal load.
97. Prior to issuance of a building permit, the Project Sponsor shall demonstrate to the City that window glazing, wall insulation, and efficient ventilation methods have been incorporated into building designs.
98. Prior to issuance of a building permit, the Project Sponsor shall demonstrate that building designs incorporate efficient heating units and other appliances, such as water heater, cooking equipment, refrigerators, furnaces and boiler units.

² Measure 82 also serves as an energy efficiency mitigation measure.

99. Prior to issuance of a building permit, the Project Sponsor shall incorporate into building designs, where feasible, passive solar designs and solar heaters.
110. The Project Sponsor shall ensure that low emission mobile and stationary equipment is utilized during construction, and low sulfur fuel is utilized in stationary equipment, when available. Evidence of this fact shall be provided to the City of Newport Beach prior to issuance of any grading or building permit.

Mitigation Measures Proposed for Revision

Mitigation Measure 36 requires that the SCAQMD verify necessary permits for regulated equipment. It further states that if the new emissions result in impacts not previously considered or that significantly change the land use impact, appropriate CEQA documentation shall be prepared prior to issuance of any permits for that phase of development. This mitigation measure is combining two processes. The SCAQMD would review the data pertaining to the use of regulated equipment. In order for the applicant to receive the required permit, the project would need to meet the SCAQMD-established standards. The issue pertaining to new significant impacts associated with emissions or land use impacts would not be within SCAQMD's jurisdiction, so to avoid confusion, this portion of the mitigation measure is recommended for deletion. The City of Newport Beach would continue to be responsible for ensuring that appropriate CEQA documentation is prepared. The recommended changes are shown below. ~~Strikeout text~~ is used to show deleted wording. This measure would continue to apply to the Hoag Hospital Master Plan.

36. Prior to the issuance of grading permits for each phase of development, the Project Sponsor shall provide evidence for verification by the Planning Department that the necessary permits have been obtained from the SCAQMD for regulated commercial equipment incorporated within each phase. An air quality analysis shall be conducted prior to each phase of development for the proposed mechanical equipment contained within that phase that identifies additional criteria pollutant emissions generated by the mechanical equipment to be installed in the phase. ~~If the new emissions, when added to existing project emissions could result in impacts not previously considered or significantly change the land use impact, appropriate CEQA documentation shall be prepared prior to issuance of any permits for that phase of development. Each subsequent air quality analysis shall be reviewed and approved by the SCAQMD.~~

For Mitigation Measure 38, a revision to item g is proposed to cross-reference Mitigation Measure 30, which pertains to bus turnouts (Section XV, Transportation/Circulation). As discussed in Section XV, the location and design of bus turnouts is within the jurisdiction of the Orange County Transportation Authority (OCTA). The recommended changes are shown below. ~~Strikeout text~~ is used to show deleted wording and *italic text* is used to show new wording.

38. Prior to the issuance of grading and building permits for each phase of Master Plan development, the Project Sponsor shall provide evidence that site plans incorporate the site development requirements of Ordinance No. 91-16, as appropriate, to the Traffic Engineering Division and Planning Department for review and Planning Commission approval. Requirements outlined in the Ordinance include:

- a. A minimum of five percent of the provided parking at new facilities shall be reserved for carpools. These parking spaces shall be located near the employee entrance or at other preferred locations.
- b. A minimum of two bicycle lockers per 100 employees shall be provided. Additional lockers shall be provided at such time as demands warrants.
- c. A minimum of one shower and two lockers shall be provided.
- d. Information of transportation alternatives shall be provided to all employees.
- e. A rideshare vehicle loading area shall be designated in the parking area.
- f. The design of all parking facilities shall incorporate provisions for access and parking of vanpool vehicles.
- g. Bus stop improvements shall be *coordinated with the Orange County Transportation Authority, consistent with the requirements of Mitigation Measure 30.* ~~required for developments located along arterials where public transit exists or is anticipated to exist within five years.~~

The exact number of each of the above facilities within each phase of the Master Plan shall be determined by the City during review of grading and building permit applications for each phase. The types and numbers of facilities required of each phase will reflect the content of the Ordinance at the time that a permit application is deemed complete by the Planning Department.

Mitigation Measures No Longer Required

The following mitigation measure was adopted as a part of Final EIR No. 142 and has been implemented. This mitigation measure would no longer need to be tracked through mitigation monitoring.

- 87. The Project Sponsor shall submit plans to the City Building Department verifying that all roadways associated with the development of the Master Plan will be paved early in the project, as a part of Phase I Master Plan development construction activities.

Mitigation Measure 105 is covered by the California Vehicle Code, which requires covering or adequate freeboard (i.e., the height of the side wall above the load) to minimize material loss and as such is not required as a separate mitigation measure.

- 105. The project sponsor shall ensure that all trucks used for hauling material shall be covered to minimize material loss during transit.

Mitigation Measure 106 addresses compliance with the City's Grading Ordinance which is required of all grading activities in the City.

- 106. Project sponsor shall ensure that all project related grading shall be performed with the Newport Beach Grading Ordinance which contains procedures and requirements relative to dust control, erosion and siltation control, noise, and other grading related activities.

Mitigation Measure 107 is proposed for deletion. SCAQMD's Rule 403 has been amended since adoption of Final EIR No. 142. Current SCAQMD requirements will be provided in the SEIR.

107. Prior to issuance of grading permits, the project sponsor shall demonstrate compliance with SCAQMD Rule 403 which will require watering during earth moving operations. To further reduce dust generation, grading should not occur when wind speeds exceed 20 miles per hour (MPH), and soil binders should be spread on construction sites or unpaved areas. Additional measures to control fugitive dust include street sweeping of roads used by construction vehicles and wheel washing before construction vehicles leave the site.

Mitigation Measure 109 is proposed for deletion because it is vague. Other mitigation will be provided in the SEIR to achieve the same results (or better) and to provide a greater level of specificity.

109. Prior to issuance of a grading permit for each phase of construction the Project Sponsor shall submit an analysis to the City Building Department that documents the criteria emissions factors for all stationary equipment to be used during that phase of construction. The analysis shall utilize emission factors contained in the applicable SCAQMD Handbook. The analysis shall also be submitted to the City of Newport Beach Planning Department for review and approval.

d) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. The potential for carbon monoxide concentrations that could adversely affect sensitive receptors in the project area will be determined as a part of the SEIR.

Mitigation Measures Proposed for Revision

When Final EIR No. 142 was certified in 1992 there was not a certified Air Quality Management Plan (AQMP) for the region. The AQMP (Appendix C) contains Localized Significance Threshold Mass Rate Look-Up Tables. These tables have been developed as a screening mechanism to determine if carbon monoxide hot spot modeling is required. If a project fits within the parameters listed in the table, then further analysis is not required. Mitigation Measure 121 is being modified to reflect the incorporation of these tables in the AQMP. Modifications to the measure are shown in ~~strikeout~~ (deleted text) and *italics* (new text).

121. Prior to issuance of a grading permit for each individual phase of development, the Project Sponsor shall ~~conduct~~ *determine if the project is consistent with the parameters contained the AQMP Localized Significance Threshold Mass Rate Look-Up Tables (Appendix C of the AQMP) for carbon monoxide. If the project is consistent with these provisions, no further carbon monoxide modeling is required. If the project exceeds these thresholds, a CO hot spot analysis for the subject phase of development will be prepared.* This analysis shall utilize the EMFAC7EP emission factor program for the buildout year of the subject phase of development and the CALINE4 CO hot spot model or the model recommended for such analysis at that time. The results of this analysis shall be submitted to the City of Newport Beach Planning Department for review. City staff will verify consistency with the results of the project buildout CO analysis.

e) **Create objectionable odors affecting a substantial number of people?**

Less Than Significant Impact. Hoag Hospital uses do not generate significant odors. No significant impacts would be anticipated; this issue will not be addressed in the SEIR.

IV. **BIOLOGICAL RESOURCES—Would the Amendment to the Hoag Hospital Master Plan Project:**

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

No Impact. Final EIR No. 142 identified limited biological resources, including wetlands, on the site. However, as a result of construction of facilities consistent with the Hoag Hospital Master Plan and Final EIR No. 142, those resources have been removed. Mitigation measures were adopted as part of Final EIR No. 142 that reduced the impact to a level of less than significant. These measures, which are listed below, have been fully implemented and no longer need to be carried forward. Additionally, on February 23, 2005, a qualified Biologist conducted a field review of the project site to evaluate resources on the site. The findings were that Hoag Hospital is a developed site and supports minimal decorative landscaping. As a result, the project site supports habitat that is of low value for wildlife. There are no plant or wildlife species expected to occur on the project site that are considered sensitive at either the federal, state, or local level. The project site is not part of any wildlife movement corridor. There are no riparian or wetland habitats, or any other environmentally sensitive habitat areas. Implementation of the project would not result in a decrease in the diversity of species or number of plants or animals, nor would it result in a reduction in the number of unique, rare, or endangered plant or animal species or conflict with provisions of the Orange County

Natural Community Conservation Plan Program, or any other habitat conservation plan. Further, the project will result in the removal of only non-native landscaping, which would be replaced by project landscaping. Because of the limited vegetation impacts, no significant impacts to animal life are expected. As the project will have no impacts on wildlife (as defined in the *Fish and Game Code* §711.2), the project will not contribute to potential cumulative development impacts to such wildlife. Therefore, the topic of Biological Resources will not be addressed in the SEIR.

Mitigation Measures No Longer Required

The following measures were adopted as a part of Final EIR No. 142 and have been fully implemented. The following measures do not need to be carried forward:

16. The federal wetland regulations and requirements shall be reviewed by the City and the Project Sponsor at the time the proposed work is undertaken, and the project shall comply with all applicable laws concerning removal and mitigation of wetland at the time, as required by the U.S. Army Corps of Engineers and the California Coastal Commission. If this review results in a finding by the Resources Agencies involved in the permit process that mitigation is required for impacts to the 1.07 acres of wetlands dominated by pampas grass, such mitigation will be accomplished as part of the mitigation required for impacts to sensitive wetland plant communities (Mitigation Measures 17 and 18).
17. The Project Sponsor shall prepare a comprehensive restoration and management plan for the wetland mitigation site as required by law. This plan will be submitted to the following agencies for their review and approval/ concurrence prior to issuance of grading and/or building permits for Master Plan development.
 - U.S. Army Corps of Engineers
 - U.S. Fish and Wildlife Service
 - California Department of Fish and Game
 - City of Newport Beach
18. The resulting final mitigation plan shall be approved as part of the Coastal Development Permit for the project. The plan shall also be approved as part of the Corps Section 404 Permit and Streambed Alteration Agreement, if applicable. A wetland mitigation plan approved by the appropriate agencies shall be submitted to the City of Newport Beach prior to issuance of grading and/or building permits for Master Plan development in any areas affecting wetlands.
19. The plan will be consistent with the following provisions:
 - The amount of new wetlands created under the mitigation plan shall be at least equal size to the area of sensitive wetland communities impacted by the project.
 - The wildlife habitat values in the newly created wetlands shall not be less than those lost as the result of removal of sensitive wetland communities impacted by the project.
 - The wetlands created shall not decrease the habitat values of any area important to maintenance of sensitive plant or wildlife populations.

- The wetland mitigation planning effort will take into consideration creation of 0.2 acre of salt grass habitat suitable for use by wandering skipper; such consideration would be dependent on the nature of the mitigation plan undertaken and whether wandering skipper could potentially occur in the mitigation area.
 - The plan will constitute an agreement between the applicant and the resource agencies involved. The plan shall be written so as to guarantee wetland restoration in accordance with stated management objectives within a specified time frame. The plan shall describe the applicant's responsibilities for making any unforeseen repairs or modifications to the restoration plan in order to meet the stated objectives of the plan.
20. The following detailed information will be provided by the Project Sponsor in the final mitigation plan:
- Diagrams drawn to scale showing any alternatives to natural landforms;
 - A list of plant species used;
 - The method of plant introduction (i.e., seeding, natural succession, vegetative transplanting, etc.); and
 - Details of the short-term and long-term monitoring plans, including financing of the monitoring plans.

V. CULTURAL RESOURCES—Would the Amendment to the Hoag Hospital Master Plan Project:

- a) **Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?**

No Impact. No historic resources are located on or have been identified within a one-mile radius of the project site. The Hoag Hospital project site has been subject to three prior cultural resources investigation, including one investigation conducted at Hoag Hospital subsequent to the certification of Final EIR No. 142. No historic resources were found.

- b) **Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?**

- c) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

- d) **Disturb any human remains, including those interred outside of formal cemeteries?**

Less Than Significant Impact. Potential impacts on cultural resources associated with implementation of the Hoag Hospital Master Plan were addressed in Final EIR No. 142. Additionally, a records search was conducted through the South Central Coastal Information Center at California State University, Fullerton. The South Central Coastal Information Center is a part of the California Historical Resources Information System

and provides records data for Orange, Los Angeles, and Ventura counties. The records search (February 22, 2005) included a review of all recorded archaeological sites within a one-mile radius of Hoag Hospital, and included a records review of the California Points of Historical Interest, California Historical Landmarks, California Register of Historic Places, National Register of Historic Places, and California State Historic Resources Inventory.

The Hoag Hospital site is developed and has been subject to ongoing demolition and construction activities. Associated with these activities, no prehistoric archaeological or paleontological resources have been noted. However, archaeological and paleontological resources can be uncovered and consequently impacted by excavation and construction activities. Any potential impacts to prehistoric archaeological and paleontological resources are expected to be mitigated to a less than significant level through implementation of the measures previously adopted for the Master Plan project.

For general plan and specific plan projects, pursuant to Senate Bill 18 (Government Code, Section 65352.3), local governments are required to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of protecting and/or mitigating impacts to cultural places. The EIR will include coordination with the NAHC.

Previously Adopted Mitigation Measures

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan Amendment project.

21. Prior to the issuance of a grading permit, an Orange County certified archaeologist shall be retained to, and shall, monitor the grading across the project area. The archaeologist shall be present at the pre-grading conference, at which time monitoring procedures acceptable to and approved by the City shall be established, including procedures for halting or redirecting work to permit the assessment, and possible salvage, of unearthened cultural material.
22. Prior to the issuance of grading permits, an Orange County certified paleontologist shall be retained to, and shall, monitor the grading activities. The paleontologist shall be present at the pre-grading conference, at which time procedures acceptable to and approved by the City for monitoring shall be established, including the temporary halting or redirecting of work to permit the evaluation, and possible salvage, of any exposed fossils. All fossils and their contextual stratigraphic data shall go to an Orange County institution with an educational and/or research interest in the materials.

VI. GEOLOGY AND SOILS—Would the Amendment to the Hoag Hospital Master Plan Project:

- a) **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?**

ii) Strong seismic ground shaking?

No Impact. Hoag Hospital is not in an Alquist-Priolo Zone or identified as being in an area subject to liquefaction (source: California Division of Mines and Geology). There is no visible or documented evidence of on-site conditions that could result in landsliding or slope failure. Therefore, these issues will not be addressed in the SEIR.

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

iii) Seismic-related ground failure, including liquefaction?

iv) Landslides?

Potentially Significant Impact Unless Mitigation Incorporated. Hoag Hospital is located in a region of historic seismic activity. The Newport-Inglewood Fault, an active fault, and several potentially active faults, are located close to the project site. Existing and planned medical uses would be subject to groundshaking during a seismic event. The Geotechnical Analysis conducted as part of Final EIR No. 142 adequately addressed these potential constraints to provide the City of Newport Beach City Council with an understanding of the potential impacts associated with project implementation. Mitigation measures were adopted as part of Final EIR No. 142 to reduce these impacts to a less than significant level.

In addition, the State of California has established “seismic performance” categories for older hospitals (pre-1973 local approved, non-conforming buildings) and new hospitals (post-1973 Office of Statewide Health Planning & Development [OSHPD] approved, conforming buildings). The Structural Performance Categories (SPC) are based on building age, construction type, and physical condition; Non-structural Performance Categories (NPC) are based primarily on the bracing of equipment, fire sprinkler/alarm systems, emergency power, medical gases, and communication systems. Acute care facilities are required to develop and submit a compliance plan to the OSHPD indicating the intent and actions to be taken to ensure compliance. For hospitals constructed before 1973, structural retrofits are required by the year 2008 and non-structural retrofits were to be completed by 2002. OSHPD may grant hospitals an extension under specific circumstances. Hoag Hospital has requested an extension to the January 1, 2008, seismic compliance deadline because compliance would result in an interruption of healthcare services provided by general acute care hospitals within the area.

The proposed amendment to the Master Plan would not alter the type of uses proposed on the site, nor substantially increase the intensity of the uses. With the implementation of the mitigation measures adopted as part of Final EIR No. 142, no further assessment in the SEIR is required.

Previously Adopted Mitigation Measures

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan Amendment project.

1. Prior to the issuance of a grading permit, the Project Sponsor shall document to the City of Newport Beach Building Department that grading and development of the site shall be conducted in accordance with the City of Newport Beach

Grading Ordinance and with plans prepared by a registered civil engineer. These plans shall incorporate the recommendations of a soil engineer and an engineering geologist, subsequent to the completion of a comprehensive soil and geologic investigation of the site. Permanent reproducible copies of the "Approved as Built" grading plans shall be furnished to the Building Department by the Project Sponsor.

2. Prior to the issuance of a grading permit, the Project Sponsor shall submit documentation to the City of Newport Beach Building Department confirming that all cut slopes shall be monitored for potential instabilities by the project geotechnical engineer during all site grading and construction activities and strictly monitor the slopes in accordance with the documentation.
3. Prior to the issuance of a grading permit, the Project Sponsor shall provide to the City of Newport Beach a comprehensive soil and geologic investigation and report of the site prepared by a registered grading engineer and/or engineering geologist. This report shall also identify construction excavation techniques which ensure no damage and minimize disturbance to adjacent residents. This report shall determine if there are any on-site faults which could render all or a portion of the property unsafe for construction. All recommendations contained in this investigation and report shall be incorporated into project construction and design plans. This report shall be submitted to the City for review and approval.
4. Prior to the completion of the final design phase, the Project Sponsor shall demonstrate to the City of Newport Beach Building Department that all facilities will be designed and constructed to the seismic standards applicable to hospital related structures and as specified in the then current City adopted version of the Uniform Building Code.

Mitigation Measures No Longer Required

Mitigation Measure 5 pertains to geotechnical constraints. This measure requires that prior to the issuance of grading or building permits for each phase of development, the City of Newport Beach Building Department was to ensure that geotechnical recommendations included in *Report of Geotechnical Evaluation for Preparation of Master Plan and Environmental Impact Report, Hoag Memorial Hospital Presbyterian Campus* prepared by LeRoy Crandall Associates, June 1989, and in the report prepared pursuant to Mitigation Measure 3, are followed. Mitigation Measure 3 (identified above) requires a comprehensive soil and geologic evaluation prior to each grading permit, which would contain recommendations that are based on current grading standards and associated codes. The information in Mitigation Measure 5 duplicates the information in Mitigation Measure 3 and could result in conflicts with existing codes and practices. It is recommended that Mitigation Measure 5 from Final EIR No. 142 no longer apply. The measure reads as follows:

5. Prior to the issuance of grading or building permits for each phase of development, the Building Department shall ensure that geotechnical recommendations included in "Report of Geotechnical Evaluation for Preparation of Master Plan and Environmental Impact Report, Hoag Memorial Hospital Presbyterian Campus, 301 Newport Boulevard, Newport, California" as prepared by LeRoy Crandall Associates, June 1989, and in the report prepared pursuant to Mitigation Measure 3, are followed.

- b) **Result in substantial soil erosion or the loss of topsoil?**
- c) **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**
- d) **Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

Potentially Significant Impact Unless Mitigation Incorporated. As identified in Final EIR No. 142, construction activities would expose soils and thereby create the potential for short-term erosion. In accordance with County and State requirements, as individual construction projects are proposed, the project contractor will be required to implement measures to control short-term potential siltation and erosion on and off of the site. The analysis conducted as part of Final EIR No. 142 adequately addresses the potential geotechnical constraints to provide the City of Newport Beach with an understanding of the potential impacts associated with project implementation. The proposed Amendment to the Master Plan would not alter the type of uses proposed on the site or substantially increase the intensity of the uses. With the implementation of the mitigation measures adopted as part of Final EIR No. 142, these impacts would be mitigated to a less than significant level; no further assessment in the SEIR is required.

Previously Adopted Mitigation Measures

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan Amendment project.

- 6. Prior to the issuance of a grading permit, the Project Sponsor shall conduct a soil corrosivity evaluation. This evaluation shall be conducted by an expert in the field of corrosivity. This site evaluation shall be designed to address soils to at least the depth to which excavation is planned. At a minimum, at least one sample from each soil type should be evaluated. Appropriate personnel protection shall be worn by field personnel during the field evaluation. In the event soils are found to be corrosive, the source and extent of the corrosive soils shall be determined, and all buildings and infrastructure shall be designed to control the potential impact of corrosive soils over time.
- 7. Based on the corrosion assessment and source determination, a soils and construction material compatibility evaluation shall be undertaken, concluding with the appropriate mitigation measures and design criteria. Corrosion resistant construction materials are commonly available and shall be used where the evaluation/assessment concludes that corrosive soils conditions could adversely impact normal construction materials or the materials used for the mitigation of subsurface gas conditions. For example, there are many elastomers and plastics, like PVC, which are resistant to corrosion by up to 70 percent sulfuric acid at 140 degrees Fahrenheit.
- 8. Should the soil be identified as hazardous due to the severeness of their corrosivity (i.e., a pH less than 2.5), on-site remediation by neutralization shall be undertaken prior to construction. Appropriate regulatory agency approvals and permits shall also be obtained.

9. Prior to issuance of grading permits, the Project Sponsor shall ensure that a construction erosion control plan is submitted to and approved by the City of Newport Beach that is consistent with the City of Newport Beach Grading Ordinance and includes procedures to minimize potential impacts of silt, debris, dust and other water pollutants. These procedures may include:
- the replanting of exposed slopes within 30 days after grading or as required by the City Engineer.
 - the use of sandbags to slow the velocity of or divert stormflows.
 - the limiting of grading to the non-rainy season.

The project Sponsor shall strictly adhere to the approved construction erosion control plan and compliance shall be monitored on an on-going basis by the Newport Beach Building Department.

- e) **Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

No Impact. The proposed project does not require the use of a septic tank or an alternative wastewater disposal system. Therefore, this issue will not be addressed in the SEIR.

VII. HAZARDS AND HAZARDOUS MATERIALS—Would the Amendment to the Hoag Hospital Master Plan Project:

- a) **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Less Than Significant Impact. Hazardous materials are used during medical diagnosis and treatment, research, and facility operation and maintenance. Hazardous materials typically used in small quantities include chemical reagents, solvents, radioisotopes, paints, cleansers, pesticides, photographic chemicals, and biohazardous substances. Similarly, different types of hazardous wastes are generated (usually in small quantities) through these activities. The analysis conducted as part of the Final EIR No. 142 adequately addresses the potential impacts associated with the use of these materials to provide the City of Newport Beach with an understanding of the potential impacts associated with project implementation. Final EIR No. 142 determined that significant impacts would be mitigated to a less than significant level. In addition, current federal, State, and local regulations pertaining to the handling of such materials would apply. The proposed amendment to the Master Plan would not alter the type of uses proposed on the site or substantially increase the intensity of the uses. With the implementation of the mitigation measures adopted as part of Final EIR No. 142, no further evaluation of this topic is necessary in the SEIR.

Previously Adopted Mitigation Measures

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan Amendment project.

83. Before the issuance of building permits, the Project Sponsor must submit plans to the City of Newport Beach demonstrating that its Hazardous Material and Waste Management Plan and its infectious Control Manual have been modified to include procedures to minimize the potential impacts of emissions from the handling, storage, hauling and destruction of these materials, and that the Project Sponsor has submitted the modified plans to the City of Newport Beach, Fire Prevention Department, and the Orange County Health Care Agency, as required by the Infections Waste Act and AB2185/2187.
 84. Project Sponsor shall continue compliance with its Hazardous Material and Waste Management Program and its Infectious Control Manual for all new activities associated with the proposed Master Plan, as well as comply with all new regulations enacted between now and completion of the proposed Master Plan.
 85. To the satisfaction of the City building official, the Project Sponsor shall expand existing hazardous infectious, radiological disposal facilities to add additional storage areas as necessary to accommodate the additional waste to be generated by the expanded facilities.
 86. The Project Sponsor shall provide evidence to the Planning Director that measures to ensure implementation and continue compliance with all applicable SCAQMD Air Toxic Rules, specifically Rules 1401, 1402, 1403, 1405 and 1415, are being carried out.
 122. The methane gas facility and all building on the lower campus shall be subject to all laws and regulations applicable, including, but not limited to, the Federal Regulation contained in 29 CFR 1910, the State Health and Safety Code, Division 20, Chapter 6.9.5, and the regulations of OSHA and the National Fire Protection Association. Prior to the issuance of building permits on the lower campus, the Project Sponsor shall submit, to the Newport Beach Fire Department a compliance review report of all the above referenced laws and regulations.
- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

Less Than Significant Impact. Implementation of the Hoag Hospital Master Plan assumes that certain existing structures will be demolished and others rehabilitated/ altered. Demolition of buildings and building features could expose construction personnel, staff, patients, and visitors to asbestos-containing building materials and lead-based paint. Because many of the hospital's structures were constructed prior to the mid-1970s when asbestos-containing building materials were being manufactured and used in construction projects, demolition and rehabilitation/alteration efforts may require mitigation to prevent the release of asbestos-containing building materials into the air. The disposition of hazardous materials is subject to regulations set forth at a federal and State level. Because exposure to such materials can result in adverse health effects in uncontrolled situations, several regulations and guidelines pertaining to abatement of and protection from exposure to asbestos have been adopted for demolition activities.

Regulations that will be followed during construction/demolition activities include: (1) SCAQMD Rules and Regulations pertaining to asbestos abatement (including Rule 1403); (2) Construction Safety Orders 1629 (pertaining to asbestos) and 1532.1 (pertaining to lead) from Title 8 of the *California Code of Regulations*, Part 61 (Subpart M) of the *Federal Code of Regulations* pertaining to asbestos; and (3) lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD). In accordance with Rule 1403, any demolition work involving asbestos-containing materials must be identified and potential emissions from asbestos must be determined.

In California, asbestos and lead abatement must be performed and monitored by contractors with appropriate certifications from the California Department of Health Services (DHS). In addition, the California Occupational Safety and Health Administration (Cal/OSHA) has regulations concerning the use and management of such hazardous materials. Cal/OSHA enforces the hazard communication program regulations. All demolition that could result in the release of lead and asbestos must be conducted according to Cal/OSHA standards.

Final EIR No. 142 notes that Hoag Hospital's Lower Campus is located in the Newport Beach methane gas mitigation district and that methane gas is a public nuisance and public safety hazard for the Lower Campus and in the immediate vicinity of the site (Balboa Coves). To reduce the odors (hydrogen sulfide) and fire hazard (methane gas), the City of Newport Beach installed an experimental gas collection system and gas burner near Balboa Coves, with subsequent burners and wells installed in 1972 and 1976, respectively. Local effects from methane seeps included minor fires from trapped gas and economic impacts from source control measures and monitoring. Final EIR No. 142 further noted that project development in the Lower Campus could increase gas seepage. A mitigation program was approved as a part of Final EIR No. 412. As a consequence of implementation of the mitigation program, Hoag Hospital has constructed a cogeneration facility. One of the functions of the cogeneration facility is to collect and safely reuse methane gas, thereby mitigating safety hazards associated with the presence of methane gas.

Therefore, these issues have been fully addressed in Final EIR No. 142. In addition, the project would be required to adhere to applicable procedures and regulations for the removal and disposal of these materials. The proposed amendment to the Master Plan would not alter the types of uses proposed on the site nor substantially increase the intensity of the uses. With the implementation of the mitigation measures adopted as part of Final EIR No. 142, no further evaluation of this topic is necessary in the SEIR.

Previously Adopted Mitigation Measures

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan Amendment.

49. In the event that hazardous waste is discovered during site preparation or construction, the Project Sponsor shall ensure that the identified hazardous waste and/or hazardous materials are handled and disposed in the manner specified by the State of California Hazardous Substances Control Law (Health and Safety Code Division 20, Chapter 6.5), standards established by the California Department of Health Services, Office of Statewide Health Planning

and Development, and according to the requirements of the California Administrative Code, Title 30, Chapter 22.

52. A soil gas sampling and monitoring program shall include methane and hydrogen sulfide levels. Samples shall be taken just below the depth of actual disturbance. (The individuals(s) performing this initial study may be at risk of exposure to significant—and possibly lethal—doses of hydrogen sulfide, and shall be appropriately protected as required.)
53. A site safety plan shall be developed that addresses the risks associated with exposures to methane and hydrogen sulfide. Each individual taking part in the sampling and monitoring program shall receive training on the potential hazards and on proper personal protective equipment. This training shall be at least at the level required by CFR 2910.120.
54. If the analysis of the initial soil gas samples shows unacceptable levels of hazardous constituents that have the potential to pose a health risk during construction activities, additional gas collection wells shall be drilled to contain and collect the gas.
55. Continuous monitoring for methane and hydrogen sulfide³
56. A study of other hazardous constituents that may be present in quantities that pose a health risk to exposed individuals shall be prepared and evaluated prior to the initiation of the project. The constituents studied shall include compounds that are directly related to petroleum, such as benzene and toluene.
59. In the event additional gases are to be collected from newly constructed collection wells as part of a measure to reduce exposures during construction, an evaluation of the capacity and efficiency of the present flare system shall be conducted prior to connecting any new sources.
62. A study of the concentration of potential hazardous constituents shall be conducted prior to initiation of the project to characterize the wastewater and any risk it may pose to human health prior to development. A stormwater pollution prevention plan shall be developed to reduce the risk of the transport of hazardous constituents from the site. The Hospital shall apply for coverage under the State Water Resources Control Board's General Permit for Storm Water Discharges Associated with Construction Activity and shall comply with all the provisions of the permit, including, but not limited to, the development of the SWPPP, the development and implementation of Best Management Practices, implementation of erosion control measures, the monitoring program requirements, and post construction monitoring of the system.
63. Soil samples shall be collected from the appropriate locations at the site and analyzed for BTEX and priority pollutants; if the soils are found to contain unacceptable levels of hazardous constituents, appropriate mitigation will be

³ The record shows an incomplete Mitigation Measure 55; however, the provision for continuous monitoring and treatment of methane and hydrogen sulfide is contained in other measures, such as Mitigation Measures 52, 53, 58, 60, 61, 64, 66, 72, 74–76, 79, and 122. Protection from methane and hydrogen sulfide is adequately provided through these measures.

required, including a complete characterization of both the vertical and horizontal extent of the contamination, and a remedial action plan shall be completed and approved by the California Regional Water Quality Control Board. The project Sponsor must demonstrate to the City of Newport Beach compliance with this measure prior to issuance of any permits for Phase I construction activities.

66. Before the issuance of building permits, the Project Sponsor shall submit plans to the Building Department City of Newport Beach, demonstrating that continuous hydrogen sulfide monitoring equipment with alarms to a manned remote location have been provided in building designs. This monitoring equipment must be the best available monitoring system, and the plans must include a preventative maintenance program for the equipment and a calibration plan and schedule.
68. Prior to issuance of building permits, Project Sponsor shall submit plans to the City of Newport Beach ensuring that all structures built on the Lower Campus are designed for protection from gas accumulation and seepage based on the recommendations of a geotechnical engineer.
69. Project Sponsor shall submit plans to the City of Newport Beach indicating where gas test boring will be drilled under each proposed main building site once specific building plans are complete. Such testing shall be carried out, and test results submitted to the City's building official, prior to issuance of grading permits. If a major amount of gas is detected, a directionally drilled well will be permanently completed and put into the existing gas collection system.
70. Project Sponsor shall submit plans to the Grading Engineer, City of Newport Beach, indicating that all buildings and parking lots on the Lower Campus will be constructed with passive gas collection systems under the foundations. Such a system typically consists of perforated PVC pipes laid in parallel lengths below the foundation. Riser type vents will be attached to light standards and building high points. Additionally, parking lots on the Lower Campus will contain unpaved planter areas and vertical standpipes located at the end of each length of PVC pipe. The standpipes will serve to vent any collected gas to the atmosphere. A qualified geotechnical firm shall be retained to design such systems.
71. Prior to issuance of building permits, Project Sponsor shall submit plans to the Building Department, City of Newport Beach demonstrating that all buildings on the Lower Campus are sealed from gas migration. Such sealing may be installed by the use of chlorinated polyethylene sheeting or similar approved system. All material of construction including the PVC piping and the ground lining must be evaluated for compatibility with the existing environmental conditions of the soils and/or potential gases.
72. Prior to issuance of building permits, Project Sponsor shall submit plans to the City of Newport Beach Building and Fire Departments demonstrating that all buildings on the Lower Campus will be equipped with methane gas sensors. Such sensors will be installed in areas of likely accumulation, such as utility or other seldom used rooms. Sensors can monitor on a continuous basis, and can be tied into fire alarm systems for 24-hour surveillance.

73. To avoid possible accumulation of gas in utility or other seldom used service or storage rooms, Project Sponsor shall submit plans to the City of Newport Beach Building Department prior to issuance of building permits indicating that such rooms are serviced by the buildings' central air conditioning system (or an otherwise positive ventilation system that circulates and replaces the air in such rooms on a continuous basis).
74. During construction, Project Sponsor shall ensure that an explosimeter is used to monitor methane levels and percentage range. Additionally, construction contractors shall be required to have a health and safety plan that includes procedures for worker/site safety for methane. If dangerous levels of methane are discovered, construction in the vicinity shall stop, the City of Newport Beach Fire Department shall be notified and appropriate procedures followed in order to contain the methane to acceptable and safe levels.
100. The Project Sponsor shall ensure that all cut material is disposed of at either an environmentally cleared development site or a certified landfill. Also, all material exported off site shall be disposed of at an environmentally certified development cleared landfill with adequate capacity.

Mitigation Measures Proposed for Revision

Mitigation Measure 64, adopted as part of Final EIR 142, requires monitoring of the venting systems on the Lower Campus prior to issuance of building permits. The measure requires the findings be sent to the State Department of Conservation, Division of Oil and Gas, and the Southern California Air Quality Management District for comment. However, these systems are passive vents, which are not regulated by these agencies. Only the active gas extraction plant is regulated by these agencies. The standard used for passive vents is substantially below the thresholds used by these agencies for monitoring. The portion of the mitigation measure requiring agency reporting has led to confusion regarding what the agencies are expected to do with the results when they are received. Therefore, modification to the wording of the measure is recommended. The recommended changes are shown below. ~~Strikeout text~~ is used to show deleted wording. Mitigation Measure 64 would continue to apply to the Hoag Hospital Master Plan.

64. Prior to the issuance of grading of building permits, the Project Sponsor shall evaluate all existing vent systems located on the lower campus and submit this data to the City Building and Fire Departments. ~~the State Department of Conservation, Division of Oil and Gas, and the Southern California Air Quality Management District for comment.~~ Additionally, any proposed new passive vents shall be evaluated by the City Building and Fire Departments prior to the issuance of grading or building permits.

Mitigation Measures No Longer Required

The following measures were adopted as a part of Final EIR No. 142 and have been fully implemented. The following measures do not need to be carried forward:

50. Prior to construction of structures over or near the Wilshire oil well, Project Sponsor shall ensure that the Wilshire oil well, or any abandoned, unrecorded well or pressure relief well, is reabandoned to the current standards.

Abandonment plans will be submitted to the State Division of Oil and Gas (DOG) for approval prior to the abandonment procedures. The City's building official shall be notified that the reabandonment was carried out according to DOG procedures.

51. To further determine the source of the gas on the Lower Campus site, prior to issuance of a grading permit on the Lower Campus, Project Sponsor shall collect gas samples from the nearest fire flooding wells and at Newport Beach Townhomes and compare the gas samples to samples taken from the Hoag gas collection wells prior to site grading and construction.
57. A study shall be conducted that characterizes the wells, the influent gas, and the effluent of the flare. This study shall characterize the gas over a period of time, to allow for potential fluctuations in concentration and rate.
58. A scrubber system shall be required to reduce the concentration of hydrogen sulfide in the influent gas.
60. An automatic re-light system shall be installed on the flare system to reduce the risk of a potential release of high concentration of hydrogen sulfide. The system shall be designed with an alarm system that notifies a remote location which is manned 24 hours per day.
61. A continuous hydrogen sulfide monitor that would give warning of a leak of concentrations in excess of acceptable levels shall be installed in the vicinity of the flare.
65. If required by the Southern California Air Quality Air Management District, an air dispersion model shall be required in order to predict the cumulative effects of the emissions. Compliance with any additional requirements of the AQMD shall be verified through a compliance review by the district with written verification received by the Newport Beach Building Department.
67. Prior to issuance of a grading permit, the Project Sponsor shall ensure that the inferred fault traversing the site is trenched and monitored for gas prior to site grading and construction. If gas monitoring indicates a potential risk during grading, additional gas collection wells will be drilled to collect and contain the gas.
75. The project Sponsor may remove the flare system, contain the gas and utilize the gas for Lower Campus facilities. During the containment process and removal of the flare the Project Sponsor shall ensure that methane levels are monitored throughout the project area to ensure that his transition does not create an upset in methane levels or create odors or risk of explosion.
76. Prior to development on the Lower Campus, the Project Sponsor shall submit to the City of Newport Beach within one year of May 1992, plans to install a scrubber system to remove hydrogen sulfide from the influent to the flare. The design and construction of the system should be in accordance with the Best Available Control Technologies, and must be in compliance with SCAQMD (District) Regulation XIII, emission offsets and New Source Review.

77. As required by the District, the Project Sponsor shall develop a sampling and analysis protocol for District approval to evaluate the impact the existing and post-scrubber emissions will have on the ambient air quality and on possible receptor populations. The required evaluation shall include analysis for criteria and toxic pollutants, and evaluation of the potential risk associated with the emission of these pollutants (Rule 1401). Included in the plans for the design of the scrubber system should be a make-up gas source.
78. The plans for the design of the new system will include a calibration and maintenance plan for all equipment, if required by the District as a permit condition, automatic shutdown devices, sensors, and charts for continuous recording of monitoring, and flame arresters. The project sponsor shall evaluate enclosing or placing new equipment underground.
79. The Project Sponsor shall submit plans to the City of Newport Beach Building Department that demonstrate that the flare operation will be shut down within four years of August, 1992. The project sponsor must prepare and obtain approval from the SCAQMD to implement a sampling and analysis protocol for evaluation of the existing emissions from the flare after scrubbing (Mitigation Measures 75 and 76), and the effect of flare shutdown on ambient air quality. The methane gas source should be used, if engineering design allows, as a supplemental source of fuel for the Hospital's boilers. If the gas is not usable, the flare shall be relocated.
80. The plans for the design of the new system will include a calibration and maintenance plan for all equipment, and if required by the District as a permit condition, automatic shutdown devices, sensors and charts for continuous recording of monitoring, and flame arresters. The project sponsor shall evaluation enclosing or placing new equipment underground.
81. Prior to installation of the scrubber system, the Project Sponsor shall develop a protocol for a study to evaluate the integrity of the control equipment and piping. The project Sponsor must obtain agreement from the District on the protocol prior to initiating the study.

In addition, the following mitigation measure was adopted as part of Final EIR No. 142. While the critical care/surgery facility is not being implemented, Mitigation Measure 90 has already been implemented. Therefore, this measure would no longer apply.

90. In conjunction with the Critical Care Surgery addition, the Project Sponsor will place the overhead power lines located west of the Upper Campus underground if feasible.
- c) **Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

No Impact. There are no existing or proposed schools within ¼-mile of Hoag Hospital.

- d) **Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

No Impact. Hoag Hospital is listed on the Environmental Protection Agency (EPA) Facility Index System Database (FINDS). The EPA developed this system in order to cross reference sites for which the EPA maintains files. Not all sites on the list have had a previous violation. For those sites where there has been a prior violation, it has been remediated. No sites with current violations are listed on the FINDS system. (Source: EDR Environmental Resources, Inc., April 17, 2007)

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**

No Impact. The project site is not located within an airport land use plan or within two miles of a public airport/public use airport. No further discussion in the SEIR is required.

- f) **For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

No Impact. Hoag Hospital has an existing helipad. Helipads are subject to review by the California Department of Transportation (Caltrans) Division of Aeronautics (site approval permit and helipad permit), and by the Federal Aviation Administration (FAA). No changes to the location of the helipad are proposed as a part of the project. No further discussion in the SEIR is required.

- g) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Potentially Significant Impact Unless Mitigation Incorporated. The phased implementation of the Master Plan project would, in part, minimize disruptions to services, including the emergency response/evacuation plans. Mitigation Measure 101, adopted as a part of Final EIR No. 142, requires the preparation of a construction phasing plan to ensure that emergency access is maintained during construction activities. A study of on-site circulation will be conducted as a part of the SEIR; mitigation shall be provided, as required, to mitigate potential impacts related to emergency response and emergency evacuation.

- h) **Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

No Impact. Hoag Hospital is located in an urbanized area. No wildlands are intermixed or are adjacent to the site. Therefore, no exposure to people or the project site itself would result; no impacts would occur. This issue will therefore not be addressed in the SEIR.

VIII. HYDROLOGY AND WATER QUALITY—Would the amendment to the Hoag Hospital Master Plan Project:

- a) **Violate any water quality standards or waste discharge requirements?**
- c) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?**
- d) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site?**
- f) **Otherwise substantially degrade water quality?**

Less Than Significant Impact. The proposed amendment to the Master Plan project is not expected to generate substantial increases in or the degradation of the quality of runoff because the site is currently developed, and with the exception of landscaping and areas currently subject to construction activities, has limited amounts of impervious surfaces. Final EIR No. 142 addressed the anticipated discharge from the project site. Additionally, the Federal Clean Water Act establishes a framework for regulating potential surface water quality impacts, mandating sewage treatment, and regulating wastewater discharges in addition to requiring communities and industries to obtain National Pollutant Discharge Elimination System (NPDES) permits to discharge storm water to urban storm sewer systems. The NPDES program is administered by the California Regional Water Quality Control Boards (RWQCB). The Santa Ana Regional Water Quality Control Board (SARWQCB) issued the third term NPDES permit (Order No. R8-2002-0010), which governs the public storm drain system discharges in Orange County from the storm drain systems owned and operated by the County of Orange and Orange County cities (collectively “the Co-permittees”) in January 2002. This permit would regulate storm water and urban runoff discharges from proposed development to constructed storm drain systems in the project area dedicated to the City of Newport Beach. The NPDES permit specifies requirements for managing runoff water quality from new development and significant redevelopment projects, including specific sizing criteria for treatment Best Management Practices (BMPs).

To implement the requirements of the NPDES permit, the Co-permittees have developed a 2003 Drainage Area Management Plan (DAMP) that includes a New Development and Significant Redevelopment Program. This New Development and Significant Redevelopment Program provides a framework and a process for following the NPDES permit requirements and incorporates watershed protection/storm water quality management principles into the Co-permittees’ General Plan process, environmental review process, and development permit approval process. The New Development and Significant Redevelopment Program includes a Model Water Quality Management Plan (WQMP) that defines requirements and provides guidance for compliance with the NPDES permit requirements for project specific planning, selection, and design of BMPs in new development or significant redevelopment projects. The implementation of appropriate point-source structural and non-structural Best Management Practices (BMPs) consistent with the DAMP will ensure compliance with these plans.

The proposed amendment to the Master Plan would not alter the type of uses proposed on the site nor substantially increase the intensity of the uses. With the implementation of the mitigation measures adopted as part of Final EIR No. 142 (see below) and standard regulations associated with the NPDES, the project would not violate water quality standards. No further evaluation of this topic is necessary in the SEIR.

- b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

Less Than Significant Impact. Hoag Hospital is located outside the main groundwater basin of the Orange County Coastal Plain. Perched groundwater is present in the terrace deposits on the slope of the Lower Campus at the contact between the marine deposits and Monterey Formation that outcrops at the base of the slope. Ponding of water has been observed at the toe of the slope. Groundwater has been observed in borings at 26 to 44 feet below ground surface. The presence of groundwater has not been noted in the Upper Campus.

Development in the Lower Campus may require a construction dewatering and subdrain system. An NPDES Discharge Permit would be required for the discharge of any groundwater. Final EIR No. 142 determined that potentially significant impacts to groundwater could be mitigated to a level considered less than significant. Mitigation measures adopted as part of Final EIR 142 associated with groundwater and water quality would still apply. This issue will not be addressed further in the SEIR.

Previously Adopted Mitigation Measures

The following measure was adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan Amendment project.

13. Prior to the completion of final construction plans for each phase of Lower Campus development, the Project Sponsor shall submit a comprehensive geotechnical/hydrologic study to the City of Newport Beach Building Department, which includes data on groundwater. This study shall also determine the necessity for a construction dewatering program and subdrain system.

Mitigation Measures Proposed for Revision

Since the certification of Final EIR No. 142, modifications to how the NPDES permit is administered have been adopted. The State Water Resources Control Board is responsible for issuance of the NPDES permit and the RWQCB is responsible for monitoring, if deemed necessary by the permit. Changes to Mitigation Measure 14 are hereby incorporated to reflect this administrative process. The recommended changes are shown below. ~~Strikeout text~~ is used to show deleted wording and *italic text* is used to show wording that has been added. This measure would continue to apply to the Hoag Hospital Master Plan.

14. Prior to the completion of final building construction plans for each phase of Lower Campus development, the Project Sponsor shall *prepare and submit a construction storm water National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharge Associated with Construction Activity (Construction General Permit, 99-08-DWQ) and Notice of Intent (NOI) to obtain the required coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The NOI, the site plan, and a check in an amount specified by the most current fee schedule shall be sent to the State Water Resource Control Board (SWRCB). The SWRCB will send a Waste Discharger Identification (WDID) to the project Sponsor and the Regional Water Quality Control Board, Santa Ana Region for use during site inspection, if needed*~~an application to the Regional Water Quality Control Board for an NPDES permit if a construction dewatering or subdrain program is determined necessary by the Building Department based on the design and elevation of the foundation structures. Also, if dewatering is required by RWQCB, the Program Sponsor shall also conduct groundwater sampling and analysis, and submit it to the California Regional Water Quality Control Board, Santa Ana Region. The results of this testing will assist in determining the specifications for the NPDES permit. The Project Sponsor shall strictly comply with all conditions of any NPDES Permit.~~
- e) **Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

Potentially Than Significant Unless Mitigation Incorporated. Final EIR No. 142 addressed potential changes in drainage patterns and increased runoff associated with implementation of the Master Plan and noted that there was adequate capacity in the drainage system to serve Master Plan buildout. These issues have been fully addressed in Final EIR No. 142. The proposed Amendment to the Master Plan would not alter the type of uses proposed on the site or substantially increase the intensity of the uses. Therefore, the drainage patterns and flows would not be substantially different from what was previously addressed in Final EIR No. 142. With the implementation of the mitigation measures adopted as part of Final EIR No. 142, no further evaluation of this topic is necessary in the SEIR.

Previously Adopted Mitigation Measures

9. Prior to issuance of grading permits, the Project Sponsor shall ensure that a construction erosion plan is submitted to and approved by the City of Newport Beach that is consistent with the City of Newport Beach Grading Ordinance and includes procedures to minimize potential impacts of silt, debris, dust and other water pollutants. These procedures may include:
- the replanting of exposed slopes within 30 days after grading or as required by the City Engineer.
 - the use of sandbags to slow the velocity of or divert stormflows.

- the limiting of grading to the non-rainy season.

The project Sponsor shall strictly adhere to the approved construction erosion control plan and compliance shall be monitored on an on-going basis by the Newport Beach Building Department.

10. Prior to the issuance of grading permits, the Project Sponsor shall submit a landscape plan which includes a maintenance program to control the use of fertilizers and pesticides, and an irrigation system designed to minimize surface runoff and overwatering. This plan shall be reviewed by the Department of Parks, Beaches and Recreation and approved by the City of Newport Beach Planning Department. The Project Sponsor shall install landscaping in strict compliance with the approved plan.
11. The Project Sponsor shall continue the current practice of routine vacuuming of all existing parking lots and structures and shall also routinely vacuum all future parking lots and structures at current frequencies. Upon implementation of the County of Orange Storm Water Master Plan, routine vacuuming shall be done in accordance with the requirements specified in the plan.
12. Upon completion of final building construction plans, and prior to the issuance of a grading permit for each phase of development, the Project Sponsor shall ensure that site hydrological analyses are conducted to verify that existing drainage facilities are adequate. The applicant shall submit a report to the City of Newport Beach Building Department for approval, verifying the adequacy of the proposed facilities and documenting measures for the control of siltation and of erosive runoff velocities.
15. Project Sponsor shall strictly comply with its Hazardous Material and Waste Management Program and its Infectious Control Manual for all new activities associated with the proposed Master Plan, as well as strictly comply with all new regulations enacted between now and completion of the proposed Master Plan development.

Please also refer to Mitigation Measure 9 under VI.d (Geology and Soils, Threshold d).

- g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

No Impact. There is no existing housing at Hoag Hospital; no housing is proposed as a part of the project.

- h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?**

No Impact. Final EIR No. 142 states the neither the Lower Campus nor the Upper Campus are located in a 100-year flood zone. No impacts would occur and no further discussion of this topic is required.

- i) **Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**
- j) **Inundation by seiche, tsunami, or mudflow?**

No Impact. Based on the July 2003 study prepared by Earth Consultants International for the City of Newport Beach, the project site would not be subject to inundation by a tsunami even with extreme high tide conditions. The site would also not be subject to inundation as a result of dam failure since there is no dam in the vicinity of the project site.

IX. LAND USE AND PLANNING—Would the amendment to the Hoag Hospital Master Plan Project:

- a) **Physically divide an established community?**
- c) **Conflict with any applicable habitat conservation plan or natural community conservation plan?**

No Impact. The site is currently developed with medical facilities, and will not displace any land uses unrelated to the existing Hoag Hospital facilities. Further, the project site is not in or contiguous to the natural community conservation plan area. No analysis of this issue is required.

- b) **Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?**

Potentially Significant Impact. The SEIR will analyze the project's compatibility with existing and planned land uses adjacent to and in the vicinity of the site, as well as consistency with applicable planning and policy documents. The SEIR will document existing land uses on the site, as well as uses surrounding the project site. A discussion of the project's compatibility with surrounding land uses and consistency with applicable planning documents will be provided. The General Plan will be used as the basis for the analysis. Given that the type of uses proposed are the same as what is provided for in the Hoag Hospital Master Plan, the evaluation of compatibility will be focused on the uses immediately surrounding the project site. Final EIR No. 142 determined that the project would result in significant, unavoidable impacts on residential units contiguous to the western buildings located in the Upper Campus. The placement of hospital buildings adjacent to the existing residential units, in combination with shade and shadow and noise impacts, were considered significant and unavoidable impacts of the Master Plan project. These impacts were discussed in Final EIR No. 142. The proposed amendment to the Master Plan would not alter or make these impacts more severe. Therefore, while these issues will be addressed in the EIR, they would not constitute a new impact. No new significant impacts to the larger community would be anticipated with the proposed modifications.

Mitigation Measures Proposed for Revision

The following land use measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan Amendment. However, minor modifications to the mitigation measures are proposed to reflect the current status of the project (i.e., the original project has been approved and the City has processed an amendment to the Local Coastal Program to reflect the future development on the Lower Campus). ~~Strikeout text~~ is used to show deleted wording and *italic text* is used to show wording that has been added.

24. The proposed project is subject to all applicable requirements of the City of Newport Beach General Plan, Zoning Code, and Local Coastal Program (LCP). Those requirements that are superseded by the PCDP and District Regulations are not considered applicable. The following discretionary approvals are required by the City of Newport Beach: EIR certification, ~~adoption of the Master Plan,~~ adoption of *an Amendment* to the Planned Community Development Plan and District Regulations, approval of *an Amendment to the* Development Agreement, ~~approval of a zone change to Planned Community District,~~ grading permits, and building permits for some facilities. The California Coastal Development Commission has the discretionary responsibility to issue a Coastal Development Permit for the Lower Campus ~~and a Local Coastal Program Amendment for the Lower Campus.~~

Mitigation Measure 118 was adopted as part of Final EIR No. 142; however, for projects that require issuance of a building permit by the California Office of Statewide Health Planning and Development (OSHPD), the City of Newport Beach has limited jurisdiction in the review and approval of development plans. Therefore, this measure is being revised to indicate that the City of Newport Beach will provide a letter indicating review should the OSHPD request such documentation.

118. For any building subject to the issuance of the building permit by the ~~Office of the State Architect~~ California Office of Statewide Health Planning and Development (OSHPD), Hoag Hospital shall submit to OSHPD ~~the State Architect~~ a letter from the City of Newport Beach indicating that review of the ~~construction~~ development plans has been completed and that the plans are in compliance with all City requirements.

Mitigation Measures No Longer Required

The following mitigation measures were adopted as a part of Final EIR No. 142, have been implemented, and are no longer required.

23. The Project Sponsor shall construct, if feasible and by mutual agreement, and maintain a fence along the common property line west of Upper Campus. The proposed design of the fence shall be reviewed and approved by the City Engineering Department.
113. Subsequent to the approval of this Agreement by the Coastal Commission and the expiration of any statute of limitation for filing a legal challenge to this Agreement, the Master Plan, or the EIR, Hoag shall deposit Two Hundred and Fifty Thousand Dollars (\$250,000) in an account, and at a financial institution, acceptable to City. The account shall be in the name of the City provided,

however, Hoag shall have the right to access the funds in the event, but only to the extent that, Hoag constructs or installs the improvements described in (i) or (ii). Funds in the account shall be applied to the following projects (in order of priority upon notice to proceed served by City on Hoag).

- (i) The construction of a sidewalk and installation of landscaping in the Caltrans right-of-way along the west side of Newport Boulevard southerly of Hospital Road;
- (ii) The construction of facilities necessary to bring reclaimed water to West Newport and/or the Property;

Any funds remaining in the account after completion of the projects described in (i) and (ii) shall be used by the City to fund, in whole or in part, a public improvement in the vicinity of the property.

X. MINERAL RESOURCES—Would the Amendment to the Hoag Hospital Master Plan Project:

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

No Impact. The City of Newport Beach General Plan states that the Hoag Hospital site does not contain any known mineral resources. Therefore, no further analysis is necessary and this topic will not be addressed in the SEIR.

XI. NOISE—Would the Amendment to the Hoag Hospital Master Plan Project result in:

- a) **Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**
- b) **Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**
- c) **A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**
- d) **A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

Potentially Significant Impact. Final EIR No. 142 addressed the potential noise impacts associated with implementation of the Hoag Hospital Master Plan. However, the proposed Amendment would reallocate development from the Lower Campus to the Upper Campus, which would modify the trip distribution on the road network. As a result, traffic volumes on the adjacent roadways may change. This has the potential to change the traffic noise associated with the project. In addition, the proposed General Plan Amendment would increase the authorized noise levels at the Hoag Hospital property

line for noise generated by Hoag Hospital. This could result in noise levels at adjacent properties periodically exceeding standards established by the City Noise Ordinance. A Noise Study will be prepared as a part of the SEIR to address any changes in findings pertaining to noise impacts from implementation of the Hoag Hospital Master Plan.

Vibration is sound radiated through the ground. The rumbling noise caused by the vibration of room surfaces is called groundborne noise. Certain demolition and construction activities, including the use of pile drivers, can generate short-term groundborne vibration. The potential for this impact will be addressed in the SEIR.

Previously Adopted Mitigation Measures

The following noise measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan Amendment.

39. If noise levels in on-site outdoor noise sensitive use areas exceed 65 CNEL, the Project Sponsor shall develop measures that will attenuate the noise to acceptable levels for proposed hospital facilities. Mitigation through the design and construction of a noise barrier (wall, berm, or combination wall/berm) is the most common way of alleviating traffic noise impacts.
40. Prior to occupancy of Master Plan facilities, interior noise levels shall be monitored to ensure that on-site interior noise levels are below 45 CNEL. If levels exceed 45 CNEL, mitigation such as window modifications shall be implemented to reduce noise to acceptable levels.
41. Prior to issuance of a grading and/or building permit, the Project Sponsor shall demonstrate to the City that existing noise levels associated with the on-site exhaust fan are mitigated to acceptable levels. Similarly, the Project Sponsor shall demonstrate to the satisfaction of the Building Department that all noise levels generated by new mechanical equipment associated with the Master Plan are mitigated in accordance with applicable standards.
42. The City of Newport Beach shall send a letter to each emergency vehicle company that delivers patients to Hoag Hospital requesting that, upon entrance to either the Upper or Lower Campus, emergency vehicles turn off their sirens to help minimize noise impacts to adjacent residents. Hoag Hospital will provide the City with a list of all emergency vehicle companies that deliver to Hoag Hospital.
111. The Project Sponsor shall ensure that all internal combustion engines associated with construction activities shall be fitted with properly maintained mufflers and kept in proper tune.
112. The Project Sponsor shall ensure that construction activities are conducted in accordance with Newport Beach Municipal Code, which limits the hours of construction and excavation work to 7:00 a.m. to 6:00 p.m. on weekdays and 8:00 a.m. to 6:00 p.m. on Saturdays. No person shall, while engaged in construction, remodeling, digging, grading, demolition, painting, plastering or any other related building activity, operate any tool, equipment or machine in a manner that produces loud noises that disturbs, or could disturb, a person of normal sensitivity who works or resides in the vicinity, on any Sunday or any holiday.

117. Use of the heliport/helipad shall be limited to emergency medical purposes or the transportation of critically ill patients in immediate need of medical care not available at Hoag Hospital. Helicopters shall, to the extent feasible, arrive at, and depart from the helipad, from the northeast, to mitigate noise impacts on residential units to the west and south.
119. Non-vehicular activities, such as the operation of the trash compactor, which occur in the vicinity of the service/access road shall be operated only between the hours of 7:00 a.m. and 7:00 p.m. daily.

Mitigation Measures No Longer Required

The following mitigation measures were adopted as a part of Final EIR No. 142 and have been implemented. As such, these mitigation measures would no longer need to be tracked through mitigation monitoring.

114. Rooftop mechanical equipment screening on the emergency room expansion shall not extend closer than fifteen feet from the west edge of the structure and no closer than ten feet from the edge of the structure on any other side.
115. Noise from the emergency room expansion rooftop mechanical equipment shall not exceed 55 dBA at the property line.

The following mitigation measure applied to the critical care/surgery center, which will not be developed. Therefore, this measure would no longer be applicable.

120. Within one year from the date of final approval of the Planned Community District Regulations and development Plan by the California Coastal Commission, as an interim measure, the Project Sponsor shall implement an acoustical and/or landscape screen to provide a visual screen from and reduce noise to adjoining residences from the loading dock area.

The design process for the Critical Care Surgery Addition shall include an architectural and acoustical study to insure the inclusion of optimal acoustical screening of the loading dock area by that addition.

Subsequent to the construction of the Critical Care Surgery Addition, an additional acoustical study shall be conducted to assess the sound attenuation achieved by that addition. If no significant sound attenuation is achieved, the hospital shall submit an architectural and acoustical study assessing the feasibility and sound attenuation implications of enclosing the loading dock area. If enclosure is determined to be physically feasible and effective in reducing noise impacts along the service access road, enclosure shall be required. Any enclosure required pursuant to this requirement may encroach into any required setback upon the review and approval of a Modification as set forth in Chapter 20.81 of the Newport Beach Municipal Code.

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact. The project site is not located within any airport land use plan, and is located more than two miles away from the closest public or public use airport or private airstrip. No further assessment in the SEIR is therefore required.

- f) **For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact. The project is not located in the vicinity of a private airstrip. As previously discussed, Hoag Hospital has an existing helipad. The proposed project would not alter the location or demand for helicopter usage. Final EIR No. 142 acknowledges that increases in population, and use of hospital facilities, may result in an increased need for emergency helicopter service. Final EIR No. 142 also states that because this activity is subject to a Conditional Use Permit, it was not considered a part of the project. The amendment does not propose any substantial changes from what was addressed in Final EIR No. 142.

XII. POPULATION AND HOUSING—Would the Amendment to the Hoag Hospital Master Plan Project:

- a) **Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Less Than Significant Impact. The proposed project would not generate a substantial growth in population beyond what was addressed in Final EIR No. 142. Final EIR No. 142 identified no impacts in terms of population, employment, or housing. The project proposes the reallocation of up to 225,000 sf from the Lower to the Upper Campus. The level of development at the Hoag Hospital Campus is consistent with the City General Plan and with regional growth projections. The project does not provide excess infrastructure capacity that would support substantial population growth. The project would provide for increased employment. Short-term employment opportunities would be available during construction although it is anticipated that these employment opportunities could be filled by the local labor pool. With the overall growth in the size of the facilities at Hoag Hospital, there would be an increase in long-term employment opportunities, although this would be expected to be nominal. Although not expected to be significant, the potential for growth inducement on the remaining land on the Hoag Hospital site will be addressed in the SEIR.

- b) **Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**
- c) **Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

No Impact. There is no existing or planned housing at Hoag Hospital. Therefore, no housing or persons will be displaced as a part of the implementation of the proposed

Master Plan project. Because the project boundaries are the same as the existing facility, no impacts would occur. This issue will therefore not be addressed in the SEIR.

XIII. PUBLIC SERVICES

- a) **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

Fire Protection?

Police Protection?

Potentially Significant Impact. The redistribution of development on the site may result in greater traffic volumes at key intersections. The SEIR will address the potential effects of redistribution of traffic on emergency service access to the site in the traffic analysis to be prepared for the SEIR.

Previously Adopted Mitigation Measures

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan Amendment.

91. Prior to the issuance of grading permits, emergency fire access to the site shall be approved by the City Public Works and Fire Department.
94. Prior to the issuance of building permits, the Project Sponsor shall demonstrate, to the satisfaction of the City Fire Department, that all buildings shall be equipped with fire suppression systems.

Schools?

No Impact. The change in intensity of the Upper Campus would not result in impacts to schools. The project is not proposing any uses that would generate additional students.

Parks?

No Impact. As a part of the Master Plan, a 0.28-acre public view park, Sunset View Park, and a 0.52-acre linear view park were provided. The park was provided as a project amenity to the community. No impacts were identified in Final EIR No. 142. The reallocation of square footage requested as a part of the project would not result in any new significant impacts.

Other Public Facilities?

No Impact. The project would not be expected to have impacts to other public facilities. No impacts were identified in Final EIR No. 142; the proposed reallocation of square footage associated with the proposed project is not expected to result any new significant impacts.

XIV. RECREATION

- a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

No Impact. As a part of the Master Plan, a 0.28-acre public view park, Sunset View Park, and a 0.52-acre linear view park were provided, as noted in XIII. The park was provided as a project amenity to the community. No impacts were identified in Final EIR No. 142. The reallocation of square footage requested as a part of the project would not result in any new significant impacts.

Mitigation Measures No Longer Required

The following mitigation measure was adopted and has been implemented. This mitigation measure is no longer required.

- 47. Prior to issuance of building or grading permits, the Project Sponsor shall make an irrevocable offer to dedicate and grade the proposed linear and consolidated view park as identified in the project description (Figure 3.2.1). The Project Sponsor will dedicate land for a 0.28-acre consolidated view park and a 0.52-acre linear view park.

XV. TRANSPORTATION/CIRCULATION—Would the Amendment to the Hoag Hospital Master Plan Project:

- a) **Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?**
- b) **Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?**

Potentially Significant Impact. The project has the potential to generate short-term construction-related and long-term operational traffic. A Traffic Study will be prepared to evaluate implementation of the Hoag Hospital Master Plan project. The traffic study is anticipated to include the following components: (1) identification of existing traffic conditions on the project site and in the traffic study area; (2) evaluation of existing conditions with buildout of the Master Plan; (3) evaluation of future traffic conditions with the addition of cumulative projects but without the proposed project; and (4) evaluation of future traffic conditions with the addition of cumulative projects and the proposed project.

Previously Adopted Mitigation Measures

The following traffic measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan Amendment.

25. The Project Sponsor shall conduct a Traffic Phasing Ordinance (TPO) analysis for each Master Plan development project. The analysis shall identify potential intersection impacts, the proposed project traffic volume contributions at these impacted intersections, and the schedule for any intersection improvements identified as necessary by the study to ensure a satisfactory level of service as defined by the TPO. This report shall be approved by the City prior to commencement construction of the development project.
29. The project shall comply with the City of Newport Beach Transportation Demand Management Ordinance approved by the City Council pursuant to the County's Congestion Management Plan.
33. Prior to issuance of precise grading permits for Master Plan development that includes new, or modifications to existing, internal roadways (other than service roads), the Project Sponsor will prepare an internal circulation plan for submittal to and approval by the Director of Public Works that identifies all feasible measures to eliminate internal traffic congestion and facility's ingress and egress to the site. All feasible measures identified in this study shall be incorporated into the site plan.
101. In conjunction with the application for a grading permit, the Project Sponsor shall submit a construction phasing and traffic control plan for each phase of development. This plan would identify the estimated number of truck trips and measures to assist truck trips and truck movement in and out of the local street system (i.e., flagmen, signage, etc.). This plan shall consider scheduling operations affecting traffic during off-peak hours, extending the construction period and reducing the number of pieces of equipment used simultaneously. The plan will be reviewed and approved by the City Traffic Engineer prior to issuance of the grading permit.
103. The Project Sponsor shall provide advance written notice of temporary traffic disruptions to affected area business and the public. This notice shall be provided at least two weeks prior to disruptions.
104. The Project Sponsor shall ensure that construction activities requiring more than 16 truck (i.e., multiple axle vehicle) trips per hour, such as excavation and concrete pours, shall be limited between June 1 and September 1 to avoid traffic conflicts with beach and tourist traffic. At all other times, such activities shall be limited to 25 truck (i.e., multiple axle vehicle) trips per hour unless otherwise approved by the City Traffic Engineer. Haul operations will be monitored by the Public Works Department and additional restrictions may be applied if traffic congestion problems arise.

Mitigation Measures Proposed for Revision

Mitigation Measure 27 was adopted as part of Final EIR No. 142. It is recommended that this measure be updated to reflect the City's Traffic Phasing Ordinance requirements.

~~Strikeout text~~ is used to show deleted wording and *italic text* is used to show wording that has been added.

27. ~~Subsequent to completion of Phase I Master Plan development, the Project Sponsor shall conduct a project trip generation study to be reviewed and approved by the City Traffic Engineer. This study shall analyze whether the traffic to be generated by the subsequent phases of development (Phases II and III) will exceed 1,856 P.M. peak hour trips when added to the trips generated by the existing (including Phase I) Hoag Hospital development. This study shall be conducted prior to the issuance of any grading or building permits for Phase II or III development. For the Master Plan development project, the Project Sponsor shall conduct a Project Trip Generation Study in accordance with the Traffic Phasing Ordinance (TPO) guidelines and to be reviewed and approved by the City Traffic Engineer prior to permit issuance for future phases.~~

Mitigation Measure 28 has been updated to reflect changes to the South Coast Air Quality Management District's rules and regulations.

28. The Project Sponsor shall continue to comply with all applicable regulations adopted by the South Coast Air Quality Management District that pertain to trip reductions such as ~~Regulation 15 Rule 2202~~.

Mitigation Measure 35 has been updated to reflect the City's Trip Reduction Plan. The original mitigation measure stated, "all applicable regulations adopted by the Southern California Air Quality Management District that pertain to trip reductions such as Regulation 15." Since the project was approved, the South Coast Air Quality Management District has delegated the development and implementation of trip reduction plans to the local jurisdictions.

35. As each ~~phase of the~~ Master Plan project is constructed, the Project Sponsor shall provide each new employee a packet outlining the available ridesharing services and programs and the number of the Transportation Coordinator. All new employees shall be included in the yearly update of the trip reduction plan for Hoag Hospital, ~~as required by Regulation XV~~ *in compliance with the City of Newport Beach Trip Reduction Plan.*

Mitigation Measure 102 was adopted as part of Final EIR No. 142. This IS recommends this measure be modified to clarify that haul route plans are not required to be submitted as a part of a Grading Plan Application.

102. The Project Sponsor shall ensure that all haul routes for import or export materials shall be approved by the City Traffic Engineer and procedures shall conform with Chapter 15 of the Newport Beach Municipal Code. ~~Such routes shall be included in the above construction traffic plan.~~

Mitigation Measure 108 was adopted as part of Final EIR No. 142. It is recommended that this measure be modified to require a Trip Reduction Plan only in cases where the number of construction employees would be 50 or greater.

108. Prior to issuance of any grading and building permit, the Project Sponsor shall submit a Trip Reduction Plan for construction crew members *where the number of construction employees would be 50 or greater.* This plan shall identify

measures, such as ride-sharing and transit incentives, to reduce vehicle miles traveled by construction crews. The plan shall be reviewed and approved by the City Traffic Engineer.

Mitigation Measures No Longer Required

Mitigation Measure 26 was adopted as part of Final EIR No. 142. This measure applied to Phase I of the project and has been implemented. Further tracking of this mitigation measure through the Mitigation Monitoring Program is no longer necessary. A new traffic analysis is required for all phases (subsequent to Phase I) in compliance with the City Traffic Phasing Ordinance. Therefore, the following measure would not be applicable to the proposed Master Plan Amendment project:

26. Prior to issuance of building permits for Phase I of the project, the Project Sponsor shall conduct a project trip generation study, which shall be reviewed and approved by the City Traffic Engineer. This study shall determine if the traffic to be generated by existing plus Phase I development will not exceed 1,338 PM peak hour traffic trips. In the event the Traffic Engineer determines that existing plus Phase I development will generate more than 1,338 PM peak hour trips, the project shall be reduced in size or the mix of land uses will be altered to reduce the PM peak hour trips to, at, or below 1,338.

Mitigation Measure 31 was adopted as a part of Final EIR No. 142 and has been implemented.

31. Prior to issuance of a grading permit for any of the proposed Master Plan facilities, the Project Sponsor shall implement a program, approved by the City Traffic Engineer, that monitors and manages usage of the Upper and Lower Campus service roads during non-working hours. Such controls may include requesting that the majority of vendors deliver products (other than emergency products) during working hours (i.e., 7:00 a.m. to 8:00 p.m.), signage to restrict use of the road by hospital employees, physicians, patients and visitors during non-working hours, and other methods by which to restrict use. The hospital shall also request that vendors not deliver (i.e., scheduled and routine deliveries) on the weekends.

This restriction specifically applies to scheduled and routine deliveries. The results of this program shall be submitted to the City for review prior to issuance of the grading permit. If the results indicate that such controls do not significantly impact the operations of the hospital, and provided that requests for specified vendor delivery times is consistent with future Air Quality Management Plan procedures, the City may require that the program be implemented as hospital policy. If operation impacts are significant, other mitigation measures would be investigated at the time to reduce service road impacts to the adjacent residential units.

Mitigation Measure 34 was adopted as a part of Final EIR No. 142 and repeats the City's Traffic Phasing Ordinance requirements.

34. Depending on actual site build-out, intersection improvements may be required at the Hospital Road (Upper Campus access) Placentia Avenue Intersection and at the WCH (Lower Campus access) intersection. The need for these

improvements shall be assessed during subsequent traffic studies to be conducted in association with Mitigation Measure 25.

- c) **Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**
- d) **Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?**
- e) **Result in inadequate emergency access?**

Less Than Significant Impact. No changes are proposed in the Master Plan project that would result in unsafe conditions to motorists or pedestrians due to design features or incompatible uses. A study of on-site traffic circulation will be conducted as a part of the SEIR to address emergency access.

Previously Adopted Mitigation Measure

The following measure was adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan Amendment.

- 95. Prior to issuance of building permits, the Project Sponsor shall demonstrate to the City Fire Department that all existing and new access roads surrounding the project site shall be designated as fire lanes, and no parking shall be permitted unless the accessway meets minimum width requirements of the Public Works and Fire Departments. Parallel parking on one side may be permitted if the road is a minimum 32 feet in width.

Also see Mitigation Measure 91 under Public Services.

- f) **Result in inadequate parking capacity?**

Less Than Significant Impact. In accordance with the *Hoag Memorial Hospital Presbyterian Planned Community Development Criteria and District Regulations (PC Text)* (adopted on May 26, 1992, as amended) all parking for the hospital must be provided on the site in surface lots, subterranean lots, and/or parking structures. Parking requirements are set forth in the PC Text. The proposed amendments would not alter the parking requirements associated with implementation of the proposed Master Plan project. Anticipated parking requirements associated with the Master Plan buildout will be identified in the SEIR.

Previously Adopted Mitigation Measures

- 32. Prior to issuance of approvals for development phases subsequent to Phase I, the applicant shall submit to the City Traffic Engineer for his/her review and approval, a study that identifies the appropriate parking generation rates. The findings of this study shall be based on empirical or survey data for the proposed parking rates.

g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

No Impact. Final EIR No. 142 noted that implementation of the Hoag Hospital Master Plan would contribute to an increased demand for public transit. Although Final EIR No. 142 did not consider this to be a significant impact, Mitigation Measure 30 was incorporated to ensure accessibility of transit service for employees, visitors, and patrons of Hoag Hospital. The proposed project would not conflict with any adopted policies supporting alternative transportation. This issue was adequately addressed in Final EIR No. 142 and will not be further evaluated in the SEIR.

Mitigation Measures Proposed for Revision

Mitigation Measure 30 was adopted as part of the Final EIR No. 142. Minor modification to the wording of the measure is recommended to reflect that the Orange County Transportation Authority (OCTA), not the City, would determine the location for bus turnouts. The recommended changes are shown below. ~~Strikeout text~~ is used to show deleted wording and *italic text* is used to show wording that has been added. This measure would continue to apply to the Hoag Hospital Master Plan, and would apply to the project, as amended.

30. In order to ensure accessibility to the available transit services for employees, visitors and patrons of the Hospital, the following transit amenities shall be incorporated into the Master Plan project:
- Bus turnouts shall be installed if, ~~and as~~ *as* required by the City Traffic Engineer after City consultation with OCTA, at all current bus stop locations adjacent to the project site. Bus turnouts shall be installed in accordance with standard design guidelines as indicated in OCTA's *Design Guidelines for Bus Facilities*.

Please also refer to Mitigation Measure 108 above (XV.a–b), and Air Quality Mitigation Measure 38. (III.a–c)

XVI. UTILITIES AND SERVICE SYSTEMS—Would the amendment to the Hoag Hospital Master Plan Project:

- a) **Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**
- b) **Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**
- c) **Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects and/or would the project include a new or retrofitted storm water treatment control Best Management Practice (BMP), (e.g. water quality treatment basin, constructed treatment wetlands), the operation of which could result in significant environmental effects (e.g. increased vectors and odors)?**

- d) **Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**
- e) **Result in a determination by the wastewater treatment provider which services or may serve the project that has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Less Than Significant Impact. Final Program EIR No. 142 addressed potential impacts to utility and service systems. The document noted that there was adequate water supply to serve buildout of the Master Plan project. Service connections would be taken from the existing 16-inch City water main that runs east-west in a dedicated City easement on the residential side of the property line. Connections are private lines. Further, Final Program EIR No. 142 noted that there is a sewer line in West Coast Highway to serve the project. The potential need to expand the existing 15-inch City sewer trunk main was identified and addressed in Final EIR No. 142.

Previously Adopted Mitigation Measures

The following mitigation measures were adopted as part of the Final EIR No. 142 and would apply to the project.

- 92. Prior to the issuance of building permits, the Project Sponsor shall demonstrate that final design of the project shall provide for the incorporation of water-saving devices for project lavatories and other water-using facilities. The Project Sponsor will also comply with any other City adopted water conservation policies.
- 93. Prior to issuance of grading permits, a master plan of water and sewer facilities shall be prepared for the site. The Project Sponsor shall verify the adequacy of existing water and sewer facilities and construct any modifications or facilities necessitated by the proposed project development.
- f) **Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**
- g) **Comply with federal, state, and local statutes and regulations related to solid waste?**

Less than Significant. Final EIR No. 142 did not identify any significant impacts regarding the ability to provide adequate disposal capacity for municipal solid waste and infectious waste material. The project would not substantially alter the amount of solid waste being generated by the project. New regulations pertaining to solid waste disposal have been implemented since the certification of Final EIR No. 142. The California Integrated Waste Management Board requires that all counties have an approved Countywide Integrated Waste Management Plan (CIWMP). To be approved, the CIWMP must demonstrate sufficient solid waste disposal capacity for at least 15 years, or identify additional capacity outside the County's jurisdiction. Orange County's CIWMP, approved in 1996, contains future solid waste disposal demand based on the County population projections adopted by the Board of Supervisors. The Orange County landfill system has capacity in excess of 15 years. Though no significant impact is anticipated as a result of the project, the following new mitigation measure would apply to the project to further reduce impacts on County land fills.

Proposed New Mitigation Measure

- During project construction, the Contractor shall be required, to the extent practicable, to take concrete and asphalt from project demolition to an off-site recycling location to minimize impacts to existing landfills. The Contractor shall provide the City of Newport Beach Building Department verification that the materials have been recycled.

References

- Environmental Data Resources, Inc (EDR). 2007 (April). *EDR Site Report for 1 Hoag Drive, Newport Beach, California* (Prepared for the BonTerra Consulting). Millford, CT: EDR.
- LSA Associates, Inc. 1992. *Final Environmental Impact Report No. 142 for Hoag Hospital Master Plan, SCH #89061429* (Prepared for the City of Newport Beach). Irvine, CA: LSA Associates, Inc.
- Newport Beach, City of. 1992 (May). *Hoag Memorial Hospital Presbyterian Planned Community Development Criteria and District Regulations*. Newport Beach, CA: the City.
- . 2006. *Land Use Element of the City of Newport Beach*. Newport Beach, CA: the City.
- South Central Coastal Information Center (SCCIC). 2005 (February). *Hoag Hospital Records Search* (Prepared for BonTerra Consulting). Fullerton, CA: SCCIC.



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630



RECEIVED BY Arnold Schwarzenegger
PLANNING DEPARTMENT Governor

JUN 15 2007

June 11, 2007

CITY OF NEWPORT BEACH

Mr. James Campbell
City of Newport Beach
3300 Newport Boulevard
Newport Beach, California 92663

NOTICE OF PREPARATION (NOP) FOR HOAG MEMORIAL HOSPITAL PRESBYTERIAN MASTER PLAN AMENDMENT (SCH# 1991071003)

Dear Mr. Campbell:

The Department of Toxic Substances Control (DTSC) has received your submitted document for the above-mentioned project. As stated in your document: "The project proposes amendments to the Development Agreement, General Plan, and PC Text".

Based on the review of the submitted document DTSC has comments as follows:

- 1) The EIR should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances.
- 2) The EIR should evaluate whether conditions at the site may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:
 - National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).
 - Envirostor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
 - Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.

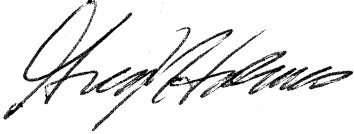
- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
 - Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
 - Leaking Underground Storage Tanks (LUST) / Spills, Leaks, Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards.
 - Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
 - The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).
- 3) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If hazardous materials or wastes were stored at the site, an environmental assessment should be conducted to determine if a release has occurred. If so, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. 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 laws, regulations and policies.
- 4) Proper investigation, sampling and remedial actions overseen by the appropriate agency, if necessary, should be conducted at the site prior to the new development or any construction.

- 5) If any property adjacent to the project site is contaminated with hazardous chemicals, and if the proposed project is within 2,000 feet from a contaminated site, then the proposed development may fall within the "Border Zone of a Contaminated Property." Appropriate precautions should be taken prior to construction if the proposed project is within a "Border Zone Property."
- 6) The project construction may require soil excavation and soil filling in certain areas. Appropriate sampling is required prior to disposal of the excavated soil. If the soil is contaminated, properly dispose of it rather than placing it in another location. Land Disposal Restrictions (LDRs) may be applicable to these soils. Also, if the project proposes to import soil to backfill the areas excavated, proper sampling should be conducted to make sure that the imported soil is free of contamination.
- 7) Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. A study of the site overseen by the appropriate government agency might have to be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.
- 8) Certain hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.
- 9) If the site was used for agricultural purposes or if weed abatement may have occurred, onsite soils may contain pesticide and agricultural chemical residue. If the project area was used for poultry, dairy and/or cattle industry operations, the soil may contain related dairy, animal, or hazardous waste. If so, activities at the site may have contributed to soil and groundwater contamination. Proper investigation and remedial actions, if necessary, should be conducted at the site prior to construction of the project.
- 10) If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exists, the EIR should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.

Mr. James Campbell
June 11, 2007
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If you have any questions regarding this letter, please contact Mr. Al Shami, Project Manager, at (714) 484-5472 or at "ashami @ DTSC.ca.gov".

Sincerely,



Greg Holmes
Unit Chief
Southern California Cleanup Operations Branch - Cypress

cc: Governor's Office of Planning and Research
State Clearinghouse
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Mr. Guenther W. Moskat, Chief
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CEQA #1667

DEPARTMENT OF TRANSPORTATION

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PLANNING DEPARTMENT

JUN 7 2007



CITY OF NEWPORT BEACH

*Flex your power!
Be energy efficient!*

June 1, 2007

Mr. James Campbell
City of Newport Beach
3300 Newport Boulevard
Newport Beach, California 92663

File: IGR/CEQA
SCH#: 1991071003
Log #: 1546A
SR-1, SR-55

Subject: Hoag Hospital Master Plan Amendment

Dear Mr. Campbell,

Thank you for the opportunity to review and comment on the **Notice of Preparation (NOP) for a Supplemental Environmental Impact Report (SEIR) for the Hoag Hospital Master Plan Amendment**. The project consists of amendment of the Development Agreement between the City of Newport Beach and Hoag Memorial Hospital to allow up to 225,000 sq ft. of authorized development to be transferred from the Lower Campus to the Upper Campus. The project site is located at One Hoag Drive in the City of Newport Beach. The nearest State Routes to the project site are Pacific Coast Highway (PCH) and SR-55.

Caltrans District 12 is a commenting agency on this project and has no comment at this time. However, in the event of any activity in Caltrans' right-of-way, an encroachment permit will be required.

Please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to call Marlon Regisford at (949) 724-2241.

Sincerely,

Handwritten signature of Ryan Chamberlain in cursive.

Ryan Chamberlain, Branch Chief
Local Development/Intergovernmental Review

C: Terry Roberts, Office of Planning and Research



South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

May 25, 2007

RECEIVED BY
PLANNING DEPARTMENT

MAY 29 2007

CITY OF NEWPORT BEACH

Mr. James Campbell, Senior Planner
City of Newport Beach
Planning Department
3300 Newport Boulevard
Newport Beach, CA 92658-8915

Dear Mr. Campbell:

**Notice of Preparation of an Environmental Impact Report for
the Hoag Memorial Hospital Presbyterian Master Plan Amendment**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Initial Study/Environmental Assessment (IS/EA). Please send the SCAQMD a copy of the Draft EIR upon its completion. **In addition, please send with the IS/EA EIR all appendices or technical documents related to the air quality analysis and electronic versions of all air quality modeling and health risk assessment files. Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, the lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2002 Model. This model is available on the SCAQMD Website at: www.aqmd.gov/ceqa/models.html.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM_{2.5} emissions from construction and operational activities and processes. In connection with developing PM_{2.5} calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM_{2.5} emissions and compare the results to the recommended PM_{2.5} significance thresholds. Guidance for calculating PM_{2.5} emissions and PM_{2.5} significance thresholds can be found at the following internet address: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

It is recommended that lead agencies for projects generating or attracting vehicular trips, especially heavy-duty diesel-fueled vehicles, perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA webpages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures


In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA webpages at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Charles Blankson, Ph.D., Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,



Steve Smith, Ph.D.

Program Supervisor, CEQA Section
Planning, Rule Development and Area Sources

SS:CB:li

ORC070516-02LI

Control Number

DRAFT

19 June 2007

To: James Campbell
Senior Planner
City of Newport Beach
3300 Newport Blvd.
Newport Beach, CA 92663

From: Environmental Quality Affairs Committee (EQAC)

Subject: Hoag Memorial Hospital Master Plan Amendment
Notice of Preparation/Initial Study
(NOP/IS) dated May 11, 2007

EQAC is please to submit comments on the subject NOP/IS in hopes of making the proposed Hoag Hospital expansion better for the city and citizens of Newport Beach. Per advice on page 1 of the NOP, EQAC has limited comments to the noise issues that were raised in the NOP.

Discussion on pages 44-45 of the IS states that increases in noise level at the Hoag Hospital property line result from reallocation of development from the Lower Campus to the Upper Campus, and states that a noise Study will be presented in the forthcoming SEIR. The SEIR should clearly point out:

1. What specific “reallocations of development” are planned?
2. Why is the City Noise Ordinance being used in place of the original noise requirements (i.e. 55 db at Hoag Hospital property lines as noted on page 3 and 4 of the NOP)?
3. What new mitigation measures (MM) are proposed to deal with the newly added noise issues?

On page 45, the IS states MM 39 which includes “noise barriers (wall, berm, combination wall/berm)” as common methods of alleviating objectionable noise. The SEIR should explain why these or other MM’s are not adequate to resolve that noise problems expected now. What are the sources of noise that require mitigation? Please identify new technologies and procedures and approaches that may be feasibly employed to mitigate equipment noise impacts.

On page 46, MM 119 proposes that “non-vehicular activities, such as operation of the trash compactor, ... shall be operated only between 7:00 am and 7:00 pm daily”. The SEIR should explain why days and hours of operation of such noises should not be more severely curtailed! On page 4 of the NOP, curtailment of grease pit cleaning operation to Saturday only from 11:00 am to 3:00 pm is proposed. The SEIR should explain why such restrictions cannot be placed on the trash compactor and other non-vehicular noises. Will additional development increase the need for additional trash compactors and other noise-generating equipment in the existing service drive area? Is another location for such equipment, further removed from the adjacent residences, feasible?

On page 46 of the IS. It is stated that MM 114 and 115 are no longer needed because they have already been implemented. Has it been shown that those MM fulfill the original intended requirements? Are the original requirements modified/changed as the result of the new “reallocation of development”?

On page 47 the discussion supporting item f. asserts that increases in population and hospital utilization may result in increased need for emergency helicopter service (with the attendant increased noise), but is not considered part of this project because it is ultimately subject to the Conditional Use Permit. Isn't it necessary (or at least wise) to deal with these expected noise problems now? Delaying mitigation could result in measures that are more expensive and/or technically not feasible compared with dealing with them now.

Thank you for the opportunity to comment on the subject NOP/IS. We trust that the EQAC comments will be useful to the proponents and dealt with in the forthcoming SEIR.

From: "Campbell, James" <JCampbell@city.newport-beach.ca.us>
To: "Dana Privitt" <DPrivitt@bonterraconsulting.com>
Date: 6/12/2007 9:40 AM
Subject: FW: Notice of Preparation

FYI.

From: Stephen Osterman [mailto:ibay4u@yahoo.com]
Sent: Monday, June 11, 2007 7:20 PM
To: Campbell, James
Cc: Jeffrey R Binkley; Walter Granath; James Nehez; Ron Seigrist
Subject: Notice of Preparation

James Campbell, Senior Planner
City of Newport Beach
Planning Department
3300 Newport Boulevard
Newport Beach, CA. 92658-8915

Dear Mr. Campbell

Thank you for sending us The Notice of Preparation regarding the Hoag Memorial Hospital Presbyterian Master Plan Amendment. I am currently on the Board of Directors of Newport Beach Townhomes Home Owners Association. As you may know NBTH is located directly across PCH from the Hoag Lower Campus and directly next to Balboa Coves.

We are very concerned about Hoag's request to change the sound levels at the Hospital to allow higher levels of sound. My understanding is that they want to change from Cal Trans highest acceptable decibel levels to City of Newport Beach highest acceptable decibel levels which are more lenient to the Hospital. The City Levels would allow higher levels of noise than would the Cal Trans specs.

We are currently suffering daily from the outside temporary generator that Hoag has employed while they work out problems with their inside generator system. We still haven't been informed how many more days the hospital will have to use this very noisy temporary generator.

Prior to the city approving Hoag's request we would like the opportunity to speak with you and Hoag officials directly regarding the sound portion of this proposed amendment.

We are apposed to the levels of noise in this area being raised in any way.

Please let me know when we may meet to discuss this issue.

Sincerely

Stephen Osterman
Bayside Realty & Investments
949-722-7153 phone

949-722-8720 fax
949-500-2144 cell
4425 W. Coast hwy.
Newport Beach, CA. 92663

**VILLA BALBOA COMMUNITY ASSOCIATION
HOAG HOSPITAL LIAISON EXECUTIVE COMMITTEE
200 Paris Lane #208
Newport Beach, CA 92663**

June 11, 2007

James Campbell
Senior Planner
City of Newport Beach
3300 Newport Boulevard
Newport Beach, CA 92685-8915

Subject: NOP, Hoag Master Plan Amendment

Dear Mr. Campbell,

Thank you for the opportunity to comment on the Revised Notice of Preparation (NOP) for a supplemental environmental impact report (SEIR) for the Hoag Memorial Hospital Presbyterian Master Plan Amendment. These comments are submitted by the Hoag Hospital Liaison Executive Committee on behalf of the Villa Balboa Community Association.

The project will entail amendment of the Newport Beach General Plan, Planned Community text, and previously adopted Development Agreement. The NOP indicates that the topics anticipated to be addressed in the SEIR would be the following:

- Aesthetics
- Air Quality
- Land Use
- Noise
- Traffic/Circulation

We respectfully suggest that other areas, such as public services and recreation, also be added, as discussed below.

The Project

It is our understanding that the changes will permit up to 225,000 square feet of allowable development to be transferred from the Lower Campus to the Upper Campus. The NOP does not provide information as to specific use or configuration of the transferred development.

Presumably, the applicant would not be proposing a transfer absent plans for a specific development. It is imperative that the specific development be addressed now. To do otherwise would violate the intent and purpose of the California Environmental Quality Act (CEQA) on two fronts. First, it would constitute improper piecemealing of the proposed project. Second, it would violate CEQA's requirement that environmental analysis be conducted as early as possible in the planning process.

The applicant also proposed to relax the previously agreed upon noise standard for the site. We note that the existing noise limit of 55dB at the property line for Hoag Hospital is consistent with the Municipal Code Section 10.26.025 which specifies a maximum allowable noise level (L_{eq}) in residential districts of 55 dBA in daytime and evening and 50 dBA at night. The Code further specifies that:

B. It is unlawful for any person at any location within the incorporated area of the City to create any noise, or to allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person, which causes **the noise level when measured on any other property** [emphasis added], to exceed either of the following:

1. The noise standard for the applicable zone for any fifteen-minute period;
2. A maximum instantaneous noise level equal to the value of the noise standard plus twenty (20) DBA for any period of time (measured using A-weighted slow response)....

We note that the specified noise limits apply not only to the zoning district in which the subject property is located but to the zoning district of adjacent property, and that the Code specifies that where two noise zones abut, the lower noise standard shall apply. It appears that the noise limits requested by the applicant are more consistent with those specified for industrial districts under the Code, although the project site is adjacent to residential properties. Further, the applicant is suggesting that the loading docks be **exempt from any applicable noise standards**. This raises the question as to whether a variance or zoning amendment is contemplated as well. This must be clarified.

Aesthetics

1. The applicant proposed to eliminate the requirement for certain visual screening along the service road adjacent to Villa Balboa. It is noted that this area includes loading docks, trash bins, and other visually unattractive areas. The SEIR must address how this change will affect the adjacent residences.
2. Depending on specific uses and energy requirements of those uses, the proposed development could increase demand for power generated by the existing cogeneration plant. The SEIR must address visual impacts of this operation, such as view blockage by steam condensate and heat plumes emitted from rooftop exhaust ports, from both residential areas, Villa Balboa and Newport Crest, and nearby recreational facilities including the bike trail and Sunset View Park, as well as the visual impact on residents and visitors traveling on West Coast Highway.

Air Quality

1. The air quality analysis must address not only PM₁₀, but PM_{2.5}, inasmuch as the finer particles are the most injurious to human health.
2. The air quality analysis must address greenhouse gases, particularly as it relates to any increased operation of the cogeneration facility.
3. The air quality analysis must address not only overall emissions but pollution hot spots.
4. The air quality analysis must address aesthetic impacts from the cooling tower and exhaust port plumes.

Biological Resources

With respect to the cogeneration plant, how does the release of condensate from the cooling towers, steam from the roof of the plant, and heat plumes emitted from rooftop exhaust ports, from the cogeneration plant affect passing wildfowl? The SEIR must address how this could increase as a result of the proposed project.

Hazards

1. The existing medical facility utilizes radioactive material and generates biowaste. Are the amounts generated consistent with the amounts anticipated in previous environmental analyses? This must be addressed in the SEIR.
2. The SEIR must address how generation of biowaste and radioactive waste would be affected by the proposed project.
3. Any effect on haul routes must be addressed.
4. Existing biowaste storage at the westerly portion of the site, adjacent to the service road, is occasionally left uncovered and is moved and sorted by individuals wearing biohazard protection outdoors, in an area open to passerby and nearby residences. The SEIR must address any increases in this activity that may occur as a result of the proposed project and the affect on nearby residents.
5. Has the sampling and analysis protocol noted in Condition 77 been implemented? Where may the public view the data collected?

Land Use and Planning

We are concerned as to the precedent the proposed project will represent with regard to its carte blanche exemption of loading docks from **any noise standard** and its relaxation of existing standards for other hospital activities. The SEIR must examine the potential for setting a precedent and the cumulative impact that could result. We note that noise generation is a key factor in determining land use compatibility.

Noise

1. The noise analysis must address the impact of operations at the maximum extent of the proposed noise limits.
2. The noise analysis (sound level tests) must be conducted at multiple points along the north, west and south Hoag property lines immediately adjacent to the cogeneration plant.

(We respectfully request advance notification of the date and time at which these tests will be conducted in order that we might observe the conduct and location of the sound measures.)

3. The noise analysis must address the frequency at which the maximum 15 minute L_{eq} will occur.
4. The noise analysis must address the potential for setting a precedent elsewhere.
5. The noise analysis must address changes in the noise environment due to increases in traffic or alteration of traffic patterns.
6. The noise analysis must address increases in noise due to any increases in cogeneration operations as a result of the proposed project.

Public Services

The SEIR must address how the reallocation of allowable development and changes in traffic patterns may affect emergency response times by police and fire personnel.

Recreation

The SEIR must address the affect the project would have on the adjacent bike trail and on Sunset View Park, specifically:

1. How will the project affect noise levels on the bike trail and the park?
2. How would any increase in demand for cogeneration operations affect views and noise levels for bicyclists and park visitors? With respect to views, items of particular concern are the condensate plumes from the cooling towers, and the heat plumes from the rooftop exhaust ports.

Transportation

The SEIR must address how the reallocation of allowable development may affect use of the westerly service road on the Hoag site and cut-through traffic in Newport Heights.

Utilities

The SEIR must address how the reallocation of allowable development may affect specific infrastructure elements such as water and sewer lines.

Cumulative Impacts

All impacts must be addressed in the context of past, present and reasonably anticipated future growth at Hoag Hospital and the surrounding area. While individual impacts of the proposed project may appear to be less than significant, they are indeed significant when added to the impacts of past growth at Hoag and elsewhere. Where data exist for actual, completed projects versus impacts anticipated in an EIR, the actual data must be utilized.

Ongoing Monitoring

We were dismayed and disappointed to learn that previously mandated annual reviews of Hoag operations had not occurred. We are thus concerned that mitigation measures adopted for the proposed project actually be implemented and enforced. Any project approvals must include greater assurances that mitigation measures and ongoing monitoring will occur in fact.

Conclusion

Thank you for the opportunity to comment. Please keep us informed as this project moves forward. Please feel free to contact us at your convenience with any questions or comments.

Sincerely,

Dick Runyon,
Chair, Hoag Hospital
Liaison Executive Committee
949-400-0569 (Cell)

Erik Thurnher
Co-Chair, Hoag Hospital
Liaison Executive Committee
408-234-7300 (Cell)



NOTICE OF PREPARATION

April 15, 2005

To: Reviewing Agencies and Other Interested Parties
From: Patricia Temple, City of Newport Beach Planning Director
Subject: Hoag Hospital Master Plan Amendment

The purpose of this notice is: (1) to serve as the Notice of Preparation to potential "Responsible Agencies" as required by the California Environmental Quality Act Section 15082; and (2) to advise and solicit comments and suggestions regarding the preparation of the Supplemental Environmental Impact Report (SEIR), environmental issues to be addressed in the SEIR, and any related issues from interested parties other than potential "Responsible Agencies," including interested or affected members of the public. The City of Newport Beach, as Lead Agency, requests that any potential Responsible or Trustee Agency responding to this notice respond in a manner consistent with CEQA Guidelines Section 15082(b).

Pursuant to CEQA Section 21080.4, Responsible Agencies must submit any comments in response to this notice no later than 30 days after receipt. The City will accept comments from others regarding this notice through the close of business, May 18, 2005.

All comments or other responses to this notice should be submitted in writing to:

David Lepo, Contract Project Manager
Hogle-Ireland, Inc.
42 Corporate Park, Suite 250
Irvine, CA 92606

The City of Newport Beach will also accept responses to this notice by e-mail received through the close of business, May 18, 2005. If e-mail comments are submitted with attachments, it is recommended that the attachments be delivered in writing to the address specified above. The virus protection measures and variety of formats for attachments can limit the ability for the attachments to be delivered. E-mail responses to this notice may be sent to: dlepo@hogleireland.com.

Project Location

Hoag Hospital is an existing facility located at One Hoag Drive in the City of Newport Beach. The approximately 38-acre site is generally bounded by Hospital Road to the north, West Coast Highway to the south, Newport Boulevard to the east, and residential development and Superior Avenue to the west. Sunset View Park is a linear/consolidated park that extends along much of the northern boundary of the Lower Campus and separates the hospital from the Villa Balboa and Seafaire condominiums. A regional location map, local vicinity map, and project site map are provided as Exhibits 1, 2, and 3, respectively.

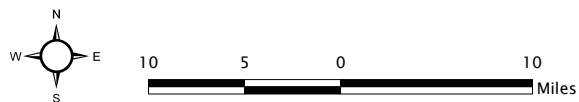


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Regional Location

Hoag Hospital Master Plan Amendment

Exhibit 1



Bonterra
CONSULTING



Local Vicinity

Hoag Hospital Master Plan Amendment

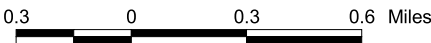
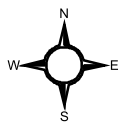
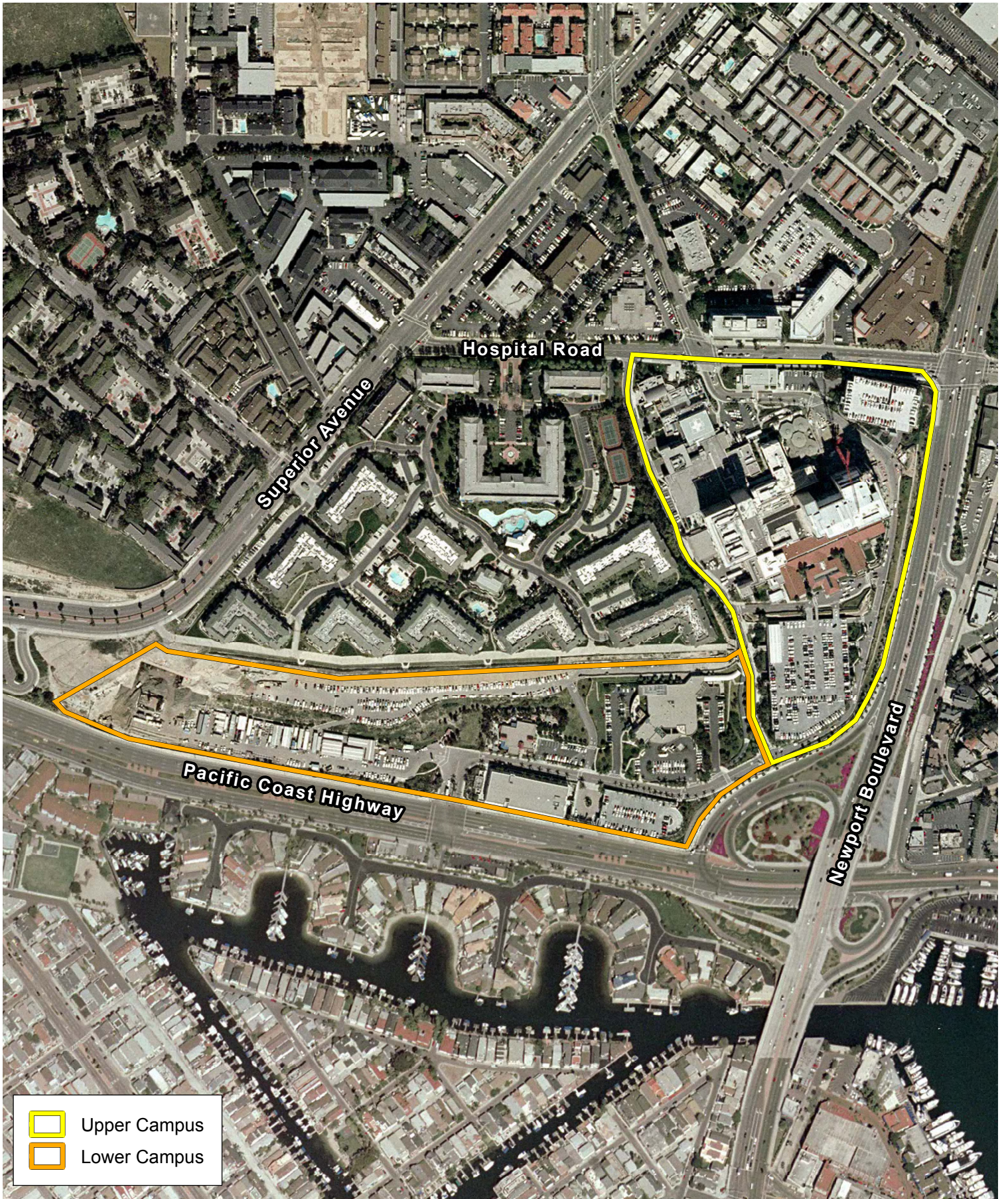


Exhibit 2

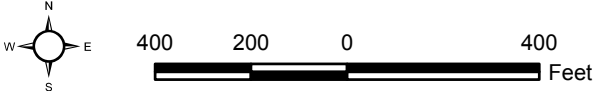




Project Site

Hoag Hospital Master Plan Amendment

Exhibit 3



D:/Projects/Newport/J008/Ex_PS_040605.mxd

Project Background

In 1992, the City of Newport Beach certified the Hoag Hospital Master Plan Final EIR No. 142 for the Hoag Hospital Master Plan and adopted the “Hoag Memorial Hospital Presbyterian Planned Community Development Criteria and District Regulations” (PC Text). In 1994, the City adopted Ordinance No. 94-8 approving “Development Agreement Between the City of Newport Beach and Hoag Memorial Hospital Presbyterian.” The PC Text and the Development Agreement set forth the development standards and terms and conditions by which the Hoag Hospital site may be developed and include maximum permissible building area, building height limits, and permitted land uses.

The existing PC Text allows up to 1,343,238 square feet (sq.ft.) of medical facility and related uses on the Hoag Hospital site. Of the total 1,343,238 sq.ft. of allowable building area, 765,349 sq.ft. are allocated to the Upper Campus and 577,889 sq.ft. are allocated to the Lower Campus.

The PC Text does not specify building locations or specific building uses; however, permitted uses for each of the two campuses are listed in the PC Text. Permitted uses on the Lower Campus are categorized as Outpatient Services, Administration, Support Services, and Residential Care. Permitted uses on the Upper Campus are categorized as Hospital Facilities including Inpatient Uses, Accessory Uses, and Temporary Structures.

In 2002, the City Council approved the first amendment to the PC Text. The first amendment changed the definition of “Gross Floor Area Entitlement” so that certain non-occupied building areas are not counted toward the maximum permissible building floor areas for the project site.

Project Description

The project consists of amendment of the “Development Agreement Between the City of Newport Beach and Hoag Memorial Hospital Presbyterian,” amendment of the General Plan, and amendment of the “Hoag Memorial Hospital Presbyterian Planned Community Development Criteria and District Regulations” (PC Text).

Amendment of the Development Agreement would allow the Newport Beach City Council the discretion to approve a request by Hoag Hospital to amend the Development Agreement and the PC Text to increase the maximum allowable building area on the Hoag Hospital site, provided that the increase in the maximum allowable building area is to accommodate the physical plant support functions of the previously constructed 24,215 square-foot cogeneration facility. An increase in the maximum allowable building area for the Hoag Hospital site by 24,215 sq.ft. could be approved because the cogeneration facility does not materially increase vehicle trip generation.

The Land Use Element of the General Plan currently includes Floor Area Ratios (FAR) for the Hoag Hospital site as the means to define maximum allowable building area. Based on a 1.0 FAR for the Upper Campus (*Hoag Hospital* Statistical Subarea) and a 0.65 FAR for the Lower Campus (*Hoag Hospital* Expansion Subarea), the current General Plan maximum allowable building areas are 765,349 sq.ft. (17.57 acres x 43,560 sq.ft. x 1.0 FAR) for the Upper Campus and 577,889 sq.ft. (20.41 acres x 43,560 sq.ft. x 0.65 FAR) for the Lower Campus, for a total of 1,343,238 sq.ft. Vacation of an unused easement by the City of Newport Beach, if approved by the City Council, could add 8,603 sq.ft. to the Lower Campus site and increase the maximum allowable building area by an additional 5,592 sq.ft. (8,603 sq.ft. x 0.65 FAR). The total maximum allowable building area for the Hoag Hospital site pursuant to the existing Land Use Element including that attributable to the land area of the easement proposed to be vacated is 1,348,830 sq.ft.

Amendment of the General Plan would replace Floor Area Ratios with maximum allowable building area as the means to define maximum development permitted on the Hoag Hospital site. This would eliminate the 1.0 Floor Area Ratio (FAR) for the *Hoag Hospital* Statistical Subarea (Upper Campus) of the Land Use Element and the 0.65 FAR for the *Hoag Expansion* Statistical Subarea (Lower Campus) of the Land Use Element. In place of FARs, an absolute, maximum allowable building area would be established for the entire Hoag Hospital site comprised of the Upper Campus and the Lower Campus. This maximum allowable building area would include that allowed by the current Land Use Element (1,343,238 sq.ft.), that attributable to the land area of the easement proposed to be vacated (5,592 sq.ft.), and 24,215 sq.ft. attributable to the previously constructed cogeneration facility, for a total allowable building area of 1,373,045 sq.ft. for the entire Hoag Hospital site. To allow future flexibility in building placement while limiting the intensity of building on the Lower Campus, the proposed amendment to the General Plan Land Use Element would establish a maximum allowable building area on the Upper Campus of 990,349 sq.ft. and a maximum allowable building area on the Lower Campus of 583,481 sq.ft. In no event could the building areas of both the Upper and Lower Campuses exceed 1,373,045 sq.ft.

The PC Text would be amended to include the maximum allowable building area of 1,373,045 sq.ft. for the entire Hoag Hospital site and to establish maximum allowable building areas of 538,481 sq.ft. for the Lower Campus and 990,349 sq.ft. for the Upper Campus, consistent with the proposed General Plan Amendment. Other changes may be required in the Hoag Hospital PC Text to reflect and be consistent with changes to the Development Agreement and General Plan indicated above and/or to provide clarification of standards applicable to future development approvals.

Use of a Supplemental EIR

The City of Newport Beach has determined that the proposed project requires the preparation of a Supplemental EIR (SEIR). CEQA Section 21166 provides that when an EIR “has been prepared for a project pursuant to this division, no subsequent or supplemental EIR shall be required by the lead or responsible agencies unless one of these events occurs.

- (a) Substantial changes are proposed in the project that requires major revisions to the environmental impact report.
- (b) Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions in the environmental impact report.
- (c) New information, which was not known and could not have been known with the exercise of reasonable diligence at the time the environmental impact report was certified as complete, becomes available.”

This is reflected in CEQA Guidelines Section 15162 which states that a subsequent EIR is required if:

- “(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following: (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration; (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR; (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.”

CEQA Guidelines Section 15163 allows a lead agency to prepare a supplement to an EIR when any of the conditions described in Section 15162 (stated above) would require the preparation of a subsequent EIR, but only minor additions or changes are necessary to make a previous EIR adequately apply to the project in the changed situation. Section 15163(b) further states, “the supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised” and “the supplement may be circulated by itself without recirculating the previous draft or final EIR.”

Anticipated Project Approvals

The City of Newport Beach would need to make the following project approvals as part of the current amendment requests:

- General Plan Amendment
- Planned Community Development Plan Amendment
- Development Agreement Amendment

In addition, prior to initiation of construction other entitlements would be required. These include:

- Traffic Phasing Ordinance Analysis
- Coastal Development Permit (for development on the Lower Campus)
- Building Permits
- Grading Permit
- Water Quality Management Plan
- Stormwater Pollution Prevention Plan
- Demolition Permit

Additionally, the Development Agreement would need to be provided to the California Coastal Commission for review and approval; it should be noted that the California Coastal Commission is not a party to the original Development Agreement.

Future implementation of the project would require permits and/or approvals from the following agencies:

- California Coastal Commission
- California Office of Statewide Health Planning and Development (OSHPD)
- State Water Resources Control Board (NPDES permits)
- South Coast Air Quality Management District

Anticipated Schedule

The project schedule, as currently envisioned, anticipates a draft SEIR to Final EIR No. 142 to be available for public review in late summer 2005. A 45-day public review period will be provided, after which responses to comments received will be prepared. A hearing before the Planning Commission and City Council are expected at the end of 2005. Master Plan implementation is expected to be phased through the year 2015.

Probable Environmental Effects of the Proposed Project

The SEIR will focus on those areas that may be affected by the proposed amendment to the Master Plan. The Final EIR will be relied upon for those topical areas where there have been no substantial changes since the previous EIR was certified and would not be affected by the proposed project. Topical areas to be addressed in the SEIR include:

- Aesthetics
- Air Quality
- Land Use
- Noise
- Public Services (police and fire services)
- Transportation/Traffic

The attached Environmental Checklist identifies the evaluation of environmental issues that will be addressed in the SEIR.

Conclusion

The City of Newport Beach requests your careful review and consideration of this notice, and it invites any and all input and comments from interested agencies and persons regarding the preparation of the proposed SEIR.

ENVIRONMENTAL CHECKLIST FORM

1. Project Title: Hoag Memorial Hospital Master Plan Amendment
2. Lead Agency Name and Address: City of Newport Beach, 3300 Newport Boulevard, Newport Beach, California 92663
3. Contact Person and Phone Number: David Lepo, Hogle-Ireland Associates, Contract Project Manager to the City of Newport Beach, 949.553.1427
4. Project Location: One Hoag Drive, Newport Beach, California
5. General Plan Designation: Governmental, Educational and Institutional Facilities
6. Zoning Designation: Hoag Hospital Planned Community (PC) Text and District Regulations
7. Description of Project: The project consists of amendment of the "Development Agreement Between the City of Newport Beach and Hoag Memorial Hospital Presbyterian," amendment of the General Plan, and amendment of the "Hoag Memorial Hospital Presbyterian Planned Community Development Criteria and District Regulations" (PC Text). The existing PC Text allows up to 1,343,238 square feet (sq.ft.) of medical facility and related uses on the Hoag Hospital site. Of the total 1,343,238 sq.ft. of allowable building area, 765,349 sq.ft. are allocated to the Upper Campus and 577,889 sq.ft. are allocated to the Lower Campus.

Amendment of the Development Agreement would allow the Newport Beach City Council the discretion to approve a request by Hoag Hospital to amend the Development Agreement and the PC Text to increase the maximum allowable building area on the Hoag Hospital site, provided that the increase in the maximum allowable building area is to accommodate the physical plant support functions of the previously constructed 24,215 square-foot cogeneration facility. An increase in the maximum allowable building area for the Hoag Hospital site by 24,215 sq.ft. could be approved because the cogeneration facility does not materially increase vehicle trip generation.

The Land Use Element of the General Plan currently includes Floor Area Ratios (FAR) for the Hoag Hospital site as the means to define maximum allowable building area. Based on a 1.0 FAR for the Upper Campus (*Hoag Hospital* Statistical Subarea) and a 0.65 FAR for the Lower Campus (*Hoag Hospital* Expansion Subarea), the current General Plan maximum allowable building areas are 765,349 sq.ft. (17.57 acres x 43,560 sq.ft. x 1.0 FAR) for the Upper Campus and 577,889 sq.ft. (20.41 acres x 43,560 sq.ft. x 0.65 FAR) for the Lower Campus, for a total of 1,343,238 sq.ft. Vacation of an unused easement by the City of Newport Beach, if approved by the City Council, could add 8,603 sq.ft. to the Lower Campus site and increase the maximum allowable building area by an additional 5,592 sq.ft. (8,603 sq.ft. x 0.65 FAR). The total maximum allowable building area for the Hoag Hospital site pursuant to the existing Land Use Element including that attributable to the land area of the easement proposed to be vacated is 1,348,830 sq.ft.

Amendment of the General Plan would replace FARs with maximum allowable building area as the means to define maximum development permitted on the Hoag Hospital site. This would eliminate the 1.0 FAR for the *Hoag Hospital* Statistical Subarea (Upper Campus) of the Land Use Element and the 0.65 FAR for the *Hoag Expansion* Statistical Subarea (Lower Campus) of the Land Use Element. In place of FARs, an absolute, maximum allowable building area would be established for the entire Hoag Hospital site comprised of the Upper Campus and the Lower Campus. This maximum allowable building area would include that

allowed by the current Land Use Element (1,343,238 sq.ft.), that attributable to the land area of the easement proposed to be vacated (5,592 sq.ft.), and 24,215 sq.ft. attributable to the previously constructed cogeneration facility, for a total allowable building area of 1,373,045 sq.ft. for the entire Hoag Hospital site. To allow future flexibility in building placement while limiting the intensity of building on the Lower Campus, the proposed amendment to the General Plan Land Use Element would establish a maximum allowable building area on the Upper Campus of 990,349 sq.ft. and a maximum allowable building area on the Lower Campus of 583,481 sq.ft. In no event could the building areas of both the Upper and Lower Campuses exceed 1,373,045 sq.ft.

The PC Text would be amended to include the maximum allowable building area of 1,373,045 sq.ft. for the entire Hoag Hospital site and to establish maximum allowable building areas of 538,481 sq.ft. for the Lower Campus and 990,349 sq.ft. for the Upper Campus, consistent with the proposed General Plan Amendment. Other changes may be required in the Hoag Hospital PC Text to reflect and be consistent with changes to the Development Agreement and General Plan indicated above and/or to provide clarification of standards applicable to future development approvals.

8. Surrounding Land Uses and Setting: The approximately 38-acre site is generally bounded by Hospital Road to the north, West Coast Highway to the south, Newport Boulevard to the east, and residential development and Superior Avenue to the west. Sunset View Park is a linear/consolidated park that extends along much of the northern boundary of the Lower Campus and separates the hospital from the Villa Balboa and Seafaire condominiums.
9. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement): Approval of the amendments to the Hoag Hospital Planned Community Text would not necessitate approvals by other agencies. The Development Agreement would need to be provided to the California Coastal Commission for review and approval; it should be noted that the California Coastal Commission is not a party to the original Development Agreement.

Future implementation of the project would require permits and/or approvals from the following agencies:

- California Coastal Commission
- California Office of Statewide Health Planning and Development (OSHPD)
- State Water Resources Control Board (NPDES permit)
- South Coast Air Quality Management District

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture Resources | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Land Use/Planning |
| <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing |
| <input checked="" type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Utilities/Service Systems | <input checked="" type="checkbox"/> Mandatory Findings of Significance | |

DETERMINATION: (To be completed by the Lead Agency.)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to be the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Printed Name

For

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

This checklist form is used to assist in evaluating the potential environmental impacts of the proposed project. The checklist form identifies potential project effects as follows: (1) Potentially Significant Impact; (2) Potentially Significant Unless Mitigation Incorporated; (3) Less Than Significant Impact; and, (4) No Impact. Substantiation and clarification for each checklist response is provided (Narrative Discussion commencing on page 13). Included in each discussion are mitigation measures, as appropriate, that are recommended for implementation as part of the proposed project.

ENVIRONMENTAL ISSUES (See attachments for information sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	√	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	√	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	√	<input type="checkbox"/>	<input type="checkbox"/>
II. AGRICULTURE RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	√	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	√	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	√	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	√	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL ISSUES (See attachments for information sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinances?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>
VI. GEOLOGY AND SOILS. Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				

ENVIRONMENTAL ISSUES (See attachments for information sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	√	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	√	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	√	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	√	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	√	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
VI. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√

ENVIRONMENTAL ISSUES (See attachments for information sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	√	<input type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
VIII. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off- site?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	√	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√

ENVIRONMENTAL ISSUES (See attachments for information sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	√	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
X. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
XI. NOISE. Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	√	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	√	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	√	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	√	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
XII. POPULATION AND HOUSING Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√

ENVIRONMENTAL ISSUES (See attachments for information sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
XIII. PUBLIC SERVICES.				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire Protection?	√	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police Protection?	√	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
XIV. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	√
XV. TRANSPORTATION/CIRCULATION. Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	√	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	√	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>
f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>

ENVIRONMENTAL ISSUES (See attachments for information sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XVI. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects??	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects and/or would the project include a new or retrofitted storm water treatment control Best Management Practice (BMP), (e.g. water quality treatment basin, constructed treatment wetlands), the operation of which could result in significant environmental effects (e.g. increased vectors and odors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XVII. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL ISSUES (See attachments for information sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	√	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NARRATIVE DISCUSSION OF CHECKLIST EVALUATION

I. AESTHETICS–Would the amendment to the Hoag Hospital Master Plan Project:

- a) Have a substantial adverse effect on a scenic vista? or**
- c) Substantially degrade the existing visual character or quality of the site and its surroundings?**

Potentially Significant Unless Mitigation Incorporated. The Hoag Hospital Master Plan Final EIR No. 142 (1992) concluded that implementation of the Master Plan project in the Upper Campus would have no significant visual impact. Development in the Lower Campus area would have a “perceived significant impact for those residents who live to the north of the Lower Campus.” The Master Plan project was also determined to incrementally contribute to significant impacts associated with shade and shadow effects.

The existing PC Text allows up to 1,343,238 square feet (sq.ft.) of medical facility and related uses on the Hoag Hospital site. Of the total 1,343,238 sq.ft. of allowable building area, 765,349 sq.ft. are allocated to the Upper Campus and 577,889 sq.ft. are allocated to the Lower Campus. As proposed, an amendment to the General Plan would establish a maximum allowable building area on the Upper Campus of 990,349 sq.ft. and a maximum allowable building area on the Lower Campus of 583,481 sq.ft. In no event could the building areas of both the Upper and Lower Campuses exceed 1,373,045 sq.ft.

Intensification of the development on the Upper Campus has the potential of changing the visual character of the site from that assessed in the Hoag Hospital Master Plan Final EIR No. 142. While no new significant impacts are anticipated, the Supplemental EIR will provide a discussion of the changes that would result with the intensification of the Upper Campus. The character of the existing aesthetic environment and visual resources, including a discussion of views within the site and views from surrounding areas to the site will be identified. The visual assessment would be based, using visual simulations, on the anticipated levels of intensity, including maximum building heights (no changes in maximum building height are proposed as a part of the project), within the development areas of the site. No changes to setbacks are proposed. The compatibility of the project's height and intensity with the surrounding area will be assessed. Potential shade and shadow impacts will be determined where known.

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan amendment.

Previously Adopted Mitigation Measures

- 43. Prior to issuance of grading permits, the Project Sponsor shall ensure that a landscape and irrigation plan is prepared for each building/improvement within the overall Master Plan. This plan shall be prepared by a licensed landscape architect. The landscape plan shall integrate and phase the installation of landscaping with the proposed construction schedule. The plan shall be subject to review by the Parks, Beaches, and Recreation Department and approval by the Planning Department and Public Works Department.

45. Prior to issuance of a building permit, the Project Sponsor shall submit plans to the City Planning Department which illustrate that all mechanical equipment and trash areas will be screened from public streets, alleys and adjoining properties.
46. Prior to issuance of building permits, the Project Sponsor shall submit plans which illustrate that major mechanical equipment will not be located on the rooftop of any structure on the Lower Campus. Rather, such buildings will have clean rooftops. Minor rooftop equipment necessary for operating purposes will comply with all building height criteria, and shall be concealed and screened to blend into the building roof using materials compatible with building materials.
48. Prior to issuance of a building permit for any Lower Campus structure, the Project Sponsor shall prepare a study of each proposed building project to assure conformance with the EIR view impact analysis and the PCDP and District Regulations, to ensure that the visual impacts identified in the EIR are consistent with actual Master Plan development. This analysis shall be submitted to and approved by the City Planning Department.

In addition, the following mitigation measure was adopted as a part of Final EIR No. 142 and has been implemented. This mitigation measure would no longer need to be tracked through mitigation monitoring.

116. The Project Sponsor shall pay 75% of the cost of planting thirty 24-inch ficus trees (or the equivalent) in the berm between the service road and Villa Balboa southerly of the tennis courts. Planting shall occur on Villa Balboa property.

Mitigation Measure 123 required screening devices for the windows of critical care/surgery that faced the Villa Balboa area. The critical care/surgery facility is not being implemented; therefore, this measure no longer applies.

123. The design of the critical care/surgery addition shall incorporate screening devices for the windows which face the Villa Balboa area for the purpose of providing privacy for residents, so long as these screening devices can be designed to meet the Hospital Building Code requirements regarding the provision of natural light to the facility.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The topography of the Upper Campus site has been modified from its original condition through grading and development of the site for the Hoag Hospital medical facilities. The Lower Campus is relatively flat and also has been developed with Hoag Hospital facilities. Hoag Hospital is located in an urbanized setting and the existing site has been developed with medical facilities, parking lots and structures, and related facilities. The site is landscaped with ornamental plant materials. Coast Highway is not a designated State Scenic Highway.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Potentially Significant Impact Unless Mitigation Incorporated. The *Hoag Memorial Hospital Presbyterian Planned Community Development Criteria and District Regulations* (adopted on May 26, 1992, as amended) notes that all "lighting systems

shall be designed and maintained in such a manner as to conceal the light source and to minimize light spillage and glare to the adjacent residential uses...” Potential light and glare impacts, particularly with respect to building materials and exterior lighting, associated with the development of the project will be evaluated. Mitigation measures will be recommended to reduce potential aesthetic and light and glare impacts to the extent feasible.

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan amendment.

Previously Adopted Mitigation Measures

44. Prior to issuance of a building permit, the Project Sponsor shall submit plans to, and obtain the approval of plans from, the City Planning Department which detail the lighting system for all buildings and window systems for buildings on the western side of the Upper Campus. The systems shall be designed and maintained in such a manner as to conceal light sources and to minimize light spillage and glare to the adjacent residential areas. The plans shall be prepared and signed by a licensed electrical engineer, with a letter from the engineer stating that, in his or her opinion, these requirements have been met.

II. AGRICULTURE RESOURCES–Would the amendment to the Hoag Hospital Master Plan Project:

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

No Impact. The Hoag Hospital project site and surrounding area are located in an urbanized area and would not convert farmland to non-agricultural use. No portion of the project site is covered by a Williamson Act Contract or is located on land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance according to 2000 Natural Resource Conservation Service mapping. No agricultural resources impacts would occur and no mitigation is required. Therefore, the topic of Agricultural Resources will not be addressed in the Supplemental EIR.

III. AIR QUALITY–Would the amendment to the Hoag Hospital Master Plan Project:

- a) **Conflict with or obstruct implementation of the applicable air quality plan? or**
- b) **Violate any air quality standard or contribute substantially to an existing or projected air quality violation? or**

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Potentially Significant Impact. The Hoag Hospital is within the South Coast Air Basin and is monitored by the South Coast Air Quality Management District (SCAQMD) and the California Air Resources Board. The South Coast Air Basin is a non-attainment area for ozone (O₃), carbon monoxide (CO), and fine particulate matter (PM₁₀). The project's short-term and long-term air quality emission levels and consistency with applicable air quality management regulations and guidelines will be addressed in the Supplemental EIR.

As a part of the Supplemental EIR, an air quality analysis will be prepared describing existing conditions, including regional and local air quality and meteorology, and the state, federal, and regional air quality regulatory framework. The air quality analysis will address construction and operational impacts associated with the proposed project. The existing air environment will be described in terms of meteorology, local topography affecting pollutant dispersion, and ambient air monitoring data. A summary of current air management efforts, which may be related to the proposed project, will be provided with particular emphasis on the 2003 AQMP, and the requirements for air quality assessments identified in the SCAQMD's CEQA Handbook. Sensitive receptor areas within the project vicinity will be identified.

Construction impacts are associated with the following activities: grading/excavation, debris removal, exhaust emissions from construction equipment, and employee vehicles. Although specific construction projects are not proposed as part of this amendment process, it is recognized that when development occurs demolition and construction activities would be associated with project implementation. Therefore, the Supplemental EIR will forecast the short-term dust and emission generation due to demolition and construction activities. Measures to reduce dust generation are required by the South Coast Air Quality Management District. Additionally, measures are contained in the 2003 AQMP for control of construction activity emissions, and these also will be included in the list of mitigation measures.

Long-term emissions are associated with increased vehicular traffic and activities on the project site, including the combustion of natural gas and the generation of electricity (i.e., increasing the capacity of the cogeneration facility that serves the hospital). The analysis would compare regional and local impacts from the project with existing conditions and future conditions without the project, using current approved emission factors, traffic estimates, and methodologies. Project-specific and cumulative impacts will be identified using SCAQMD recommended thresholds of significance for air quality impacts. A detailed discussion of the consistency of the project with the AQMP will be included. Measures will be developed to reduce significant air quality impacts to the extent possible.

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan amendment.

Previously Adopted Mitigation Measures

37. Prior to the issuance of grading and building permits for each phase of development, the project proponent shall provide evidence for verification by the Planning Department that energy efficient lighting has been incorporated into the project design.
82. Before the issuance of building permits, the Project Sponsor shall submit plans to the Building Department, City of Newport Beach, demonstrating compliance with all applicable District Rules, including Rule 401, Visible Emissions, Rule 402, Public Nuisance, and Rule 403, Fugitive Dust.
88. The Project Sponsor shall submit plans to the City Building Department prior to the issuance of a building permit for each phase of development, verifying that energy efficiency will be achieved by incorporating appropriate technologies and systems into future structures, which may include:
 - High efficiency cooling/absorption units
 - Thermal storage and ceramic cooling towers
 - Cogeneration capabilities
 - High efficiency water heaters
 - Energy efficient glazing systems
 - Appropriate off-hour heating/cooling/lighting controls
 - Time clocks and photovoltaic cells for lighting controls
 - Efficient insulation systems
 - Light colored roof and building exteriors
 - PL lighting and fluorescent lighting systems
 - Motion detector lighting controls
 - Natural interior lighting—skylights, clerestories
 - Solar orientation, earth berming and landscaping
89. The Project Sponsor shall demonstrate to the City Building Department that methods and materials, which minimize VOC emissions have been employed where practical, available and where value engineering allows it to be feasible.
96. Prior to issuance of a building permit, the Project Sponsor shall demonstrate to the City that the thermal integrity of new buildings is improved with automated time clocks or occupant sensors to reduce the thermal load.

97. Prior to issuance of a building permit, the Project Sponsor shall demonstrate to the City that window glazing, wall insulation, and efficient ventilation methods have been incorporated into building designs.
98. Prior to issuance of a building permit, the Project Sponsor shall demonstrate that building designs incorporate efficient heating units and other appliances, such as water heater, cooking equipment, refrigerators, furnaces and boiler units.
99. Prior to issuance of a building permit, the Project Sponsor shall incorporate into building designs, where feasible, passive solar designs and solar heaters.
105. The Project Sponsor shall ensure that all trucks used for hauling material shall be covered to minimize material loss during transit.
106. Project Sponsor shall ensure that all project related grading shall be performed in accordance with the City of Newport Beach Grading Ordinance, which contains procedures and requirements relative to dust control, erosion and siltation control, noise, and other grading related activities.
107. Prior to issuance of grading permits, the Project Sponsor shall demonstrate compliance with SCAQMD Rule 403 which will require watering during the morning and evening prior to or after earth moving operations. To further reduce dust generation, grading should not occur when wind speeds exceed 25 miles per hour (MPH), and soil binders or SCAQMD approved chemical stabilizers should be spread on construction sites or unpaved areas. Additional measures to control fugitive dust include street sweeping of roads used by construction vehicles, reduction of speeds on all unpaved roads to 15 miles per hour, suspension of operations during first and second stage smog alerts, and wheel washing before construction vehicles leave the site.
110. The Project Sponsor shall ensure that low emission mobile and stationary equipment is utilized during construction, and low sulfur fuel is utilized in stationary equipment, when available. Evidence of this fact shall be provided to the City of Newport Beach prior to issuance of any grading or building permit.

Two mitigation measures (Mitigation Measures 36 and 38) are proposed for revision. Mitigation Measure 36 requires verification of necessary permits from the SCAQMD for regulated equipment. It further states if the new emissions result in impacts not previously considered or significantly change the land use impact, appropriate CEQA documentation shall be prepared prior to issuance of any permits for that phase of development. This mitigation measure is combining two processes. The SCAQMD would review the data pertaining to the use of regulated equipment. In order for the applicant to receive the required permit, the project would need to meet the standards established by SCAQMD. The issue pertaining to new significant impacts associated with emissions or land use impacts would not be within SCAQMD's jurisdiction. The City of Newport Beach would continue to be responsible for ensuring that appropriate CEQA documentation is prepared. To avoid confusion, this portion of the mitigation measure is recommended for deletion. The recommended changes are shown below. Strikeout text is used to show deleted wording and italic text is used to show wording that has been added. This measure would continue to apply to the Hoag Hospital Master Plan.

36. Prior to the issuance of grading permits for each phase of development, the Project Sponsor shall provide evidence for verification by the Planning

Department that the necessary permits have been obtained from the SCAQMD for regulated commercial equipment incorporated within each phase. An air quality analysis shall be conducted prior to each phase of development for the proposed mechanical equipment contained within that phase that identifies additional criteria pollutant emissions generated by the mechanical equipment to be installed in the phase. ~~If the new emissions, when added to existing project emissions could result in impacts not previously considered or significantly change the land use impact, appropriate CEQA documentation shall be prepared prior to issuance of any permits for that phase of development. Each subsequent air quality analysis shall be reviewed and approved by the SCAQMD.~~

For Mitigation Measure 38, a revision to item g is proposed to cross reference Mitigation Measure 30, which pertains to bus turnouts (Section XV, Transportation/Circulation). As discussed in Section XV, the location and design of bus turnouts is within jurisdiction of the Orange County Transportation Authority (OCTA).

38. Prior to the issuance of grading and building permits for each phase of Master Plan development, the Project Sponsor shall provide evidence that site plans incorporate the site development requirements of Ordinance No. 91-16, as appropriate, to the Traffic Engineering Division and Planning Department for review and Planning Commission approval. Requirements outlined in the Ordinance include:
- a. A minimum of five percent of the provided parking at new facilities shall be reserved for carpools. These parking spaces shall be located near the employee entrance or at other preferred locations.
 - b. A minimum of two bicycle lockers per 100 employees shall be provided. Additional lockers shall be provided at such time as demands warrants.
 - c. A minimum of one shower and two lockers shall be provided.
 - d. Information of transportation alternatives shall be provided to all employees.
 - e. A rideshare vehicle loading area shall be designated in the parking area.
 - f. The design of all parking facilities shall incorporate provisions for access and parking of vanpool vehicles.
 - g. Bus stop improvements shall be *coordinated with the Orange County Transportation Authority, consistent with the requirements of Mitigation Measure 30.* ~~required for developments located along arterials where public transit exists or is anticipated to exist within five years.~~

The exact number of each of the above facilities within each phase of the Master Plan shall be determined by the City during review of grading and building permit applications for each phase. The types and numbers of facilities required of each phase will reflect the content of the Ordinance at the time that a permit application is deemed complete by the Planning Department.

The following mitigation measure was adopted as a part of Final EIR No. 142 and has been implemented. This mitigation measure would no longer need to be tracked through mitigation monitoring.

87. The Project Sponsor shall submit plans to the City Building Department verifying that all roadways associated with the development of the Master Plan will be paved early in the project, as a part of Phase I Master Plan development construction activities.

In addition, the Mitigation Measure 109 is proposed for deletion. When Final EIR No. 142 was certified in 1992, there was not a certified Air Quality Management Plan (AQMP). Therefore, a wide range of mitigation measures were identified in an effort to ensure the maximum amount of mitigation feasible. Since that time, the AQMP has been certified and the specific mitigation measures have been identified. Other mitigation measures (listed above) have been identified to address construction projects; however, stationary equipment is not a contributor to construction emissions.

109. Prior to issuance of a grading permit for each phase of construction the Project Sponsor shall submit an analysis to the City Building Department that documents the criteria emissions factors for all stationary equipment to be used during that phase of construction. The analysis shall utilize emission factors contained in the applicable SCAQMD Handbook. The analysis shall also be submitted to the City of Newport Beach Planning Department for review and approval

d) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. The potential for carbon monoxide concentrations that could adversely affect sensitive receptors in the project area will be determined as a part of the Supplemental EIR.

The following measure was adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan amendment project.

Previously Adopted Mitigation Measure

When Final EIR No. 142 was certified in 1992 there was not a certified Air Quality Management Plan (AQMP). The AQMP (Appendix C) contains Localized Significance Threshold Mass Rate Look-Up Tables. These tables have been developed as a screening mechanism to determine if carbon monoxide hot spot modeling is required. If a project fits within the parameters listed in the table, then further analysis is not required. Mitigation Measure 121 is being modified to reflect the incorporation of these tables in the AQMP. Modifications to the measure are shown in strike-out (deleted text) and italics (new text).

121. Prior to issuance of a grading permit for each individual phase of development, the Project Sponsor shall ~~conduct~~ *determine if the project is consistent with the parameters contained the AQMP Localized Significance Threshold Mass Rate Look-Up Tables (Appendix C of the AQMP) for carbon monoxide. If the project is consistent with these provisions, no further carbon monoxide modeling is required. If the project exceeds these thresholds, a CO hot spot analysis for the subject phase of development will be prepared.* This analysis shall utilize the EMFAC7EP emission factor program for the buildout year of the subject phase of development and the CALINE4 CO hot spot model or the model recommended for such analysis at that time. The results of this analysis shall be submitted to the City of Newport Beach Planning Department for review. City staff will verify consistency with the results of the project buildout CO analysis.

e) **Create objectionable odors affecting a substantial number of people?**

Less Than Significant Impact. Hoag Hospital uses do not generate significant odors. No significant impacts would be anticipated; this issue will not be addressed in the Supplemental EIR.

IV. **BIOLOGICAL RESOURCES—Would the amendment to the Hoag Hospital Master Plan Project:**

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

No Impact. Final EIR No. 142 identified limited biological resources, including wetlands, on the site. However, as a result of construction of facilities consistent with the Hoag Hospital Master Plan and Final EIR No. 142, those resources have been removed. Mitigation measures were adopted as part of the Final EIR that reduced the impact to a level of less than significant. These measures, which are listed below, have been fully implemented and no longer need to be carried forward. Additionally, on February 23, 2005, a qualified biologist conducted a field review of the project site to evaluate resources on the site. The findings were that Hoag Hospital is a developed site and supports minimal decorative landscaping. As a result, the project site supports habitat that is of low value for wildlife. There are no plant or wildlife species expected to occur on the project site that are considered sensitive at either the federal, state, or local level. The project site is not part of any wildlife movement corridor. There are no riparian or wetland habitats, or any other environmentally sensitive habitat areas. Implementation of the project would not result in a decrease in the diversity of species or number of plants or animals, or a reduction in the number of unique, rare, or endangered plant or animal species, or conflict with provisions of Orange County Natural Community

Conservation Plan Program, or any other habitat conservation plan. Further, the project will result in the removal of only non-native landscaping, which would be replaced by project landscaping. Because of the limited vegetation impacts, no significant impacts to animal life are expected. As the project will have no impacts on wildlife as defined in the Fish and Game Code §711.2, the project will not contribute to potential cumulative development impacts to such wildlife. Therefore, the topic of Biological Resources will not be addressed in the Supplemental EIR.

The following measures were adopted as a part of Final EIR No. 142 and have been fully implemented. The following measures do not need to be carried forward:

Previously Adopted Mitigation Measures

16. The federal wetland regulations and requirements shall be reviewed by the City and the Project Sponsor at the time the proposed work is undertaken, and the project shall comply with all applicable laws concerning removal and mitigation of wetland at the time, as required by the U.S. Army Corps of Engineers and the California Coastal Commission. If this review results in a finding by the Resources Agencies involved in the permit process that mitigation is required for impacts to the 1.07 acres of wetlands dominated by pampas grass, such mitigation will be accomplished as part of the mitigation required for impacts to sensitive wetland plant communities (Mitigation Measures 17 and 18).
17. The Project Sponsor shall prepare a comprehensive restoration and management plan for the wetland mitigation site as required by law. This plan will be submitted to the following agencies for their review and approval/ concurrence prior to issuance of grading and/or building permits for Master Plan development.
 - U.S. Army Corps of Engineers
 - U.S. Fish and Wildlife Service
 - California Department of Fish and Game
 - City of Newport Beach
18. The resulting final mitigation plan shall be approved as part of the Coastal Development Permit for the project. The plan shall also be approved as part of the Corps Section 404 Permit and Streambed Alteration Agreement, if applicable. A wetland mitigation plan approved by the appropriate agencies shall be submitted to the City of Newport Beach prior to issuance of grading and/or building permits for Master Plan development in any areas affecting wetlands.
19. The plan will be consistent with the following provisions:
 - The amount of new wetlands created under the mitigation plan shall be at least equal size to the area of sensitive wetland communities impacted by the project.
 - The wildlife habitat values in the newly created wetlands shall not be less than those lost as the result of removal of sensitive wetland communities impacted by the project.

- The wetlands created shall not decrease the habitat values of any area important to maintenance of sensitive plant or wildlife populations.
 - The wetland mitigation planning effort will take into consideration creation of 0.2 acre of salt grass habitat suitable for use by wandering skipper; such consideration would be dependent on the nature of the mitigation plan undertaken and whether wandering skipper could potentially occur in the mitigation area.
 - The plan will constitute an agreement between the applicant and the resource agencies involved. The plan shall be written so as to guarantee wetland restoration in accordance with stated management objectives within a specified time frame. The plan shall describe the applicant's responsibilities for making any unforeseen repairs or modifications to the restoration plan in order to meet the stated objectives of the plan.
20. The following detailed information will be provided by the Project Sponsor in the final mitigation plan:
- Diagrams drawn to scale showing any alternatives to natural landforms;
 - A list of plant species used;
 - The method of plant introduction (i.e., seeding, natural succession, vegetative transplanting, etc.); and
 - Details of the short-term and long-term monitoring plans, including financing of the monitoring plans.

V. CULTURAL RESOURCES—Would the amendment to the Hoag Hospital Master Plan Project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? or**

No Impact. No historic resources are located on or have been identified within a 1-mile radius of the project site. The Hoag Hospital project site has been subject to three prior cultural resources investigation, including one investigation conducted at Hoag Hospital subsequent to the certification of Final EIR No. 142. No historic resources were found.

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? or**

- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

- d) Disturb any human remains, including those interred outside of formal cemeteries?**

Less Than Significant Impact. Potential impacts on cultural resources associated with implementation of the Hoag Hospital Master Plan were addressed in Final EIR No. 142. Additionally, a records search was conducted through the South Central Coastal Information Center at California State University, Fullerton. The South Central Coastal

Information Center is a part of the California Historical Resources Information System providing records data for Orange, Los Angeles, and Ventura counties. The records search (February 22, 2005) included a review of all recorded archaeological sites within a 1-mile radius of Hoag Hospital, and included a records review of the California Points of Historical Interest, California Historical Landmarks, California Register of Historic Places, National Register of Historic Places, and California State Historic Resources Inventory.

The Hoag Hospital site is developed and has been subject to ongoing demolition and construction activities. Associated with these activities, no prehistoric archaeological or paleontological resources have been noted. However, archaeological and paleontological resources can be uncovered and consequently impacted by excavation and construction activities. Any potential impacts to prehistoric archaeological and paleontological resources are expected to be mitigated to a less than significant level through implementation of the measures previously adopted for the Master Plan project. No further assessment of prehistoric archaeological and paleontological resources in the Supplemental EIR is warranted.

The following measure was adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan amendment project.

Previously Adopted Mitigation Measures

21. Prior to the issuance of a grading permit, an Orange County certified archaeologist shall be retained to, and shall, monitor the grading across the project area. The archaeologist shall be present at the pre-grading conference, at which time monitoring procedures acceptable to and approved by the City shall be established, including procedures for halting or redirecting work to permit the assessment, and possible salvage, of unearthened cultural material.
22. Prior to the issuance of grading permits, an Orange County certified paleontologist shall be retained to, and shall, monitor the grading activities. The paleontologist shall be present at the pre-grading conference, at which time procedures acceptable to and approved by the City for monitoring shall be established, including the temporary halting or redirecting of work to permit the evaluation, and possible salvage, of any exposed fossils. All fossils and their contextual stratigraphic data shall go to an Orange County institution with an educational and/or research interest in the materials.

VI. GEOLOGY AND SOILS—Would the amendment to the Hoag Hospital Master Plan Project:

- a) **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; or**

ii) Strong seismic ground shaking?

No Impact. Hoag Hospital is not in an Alquist-Priolo Zone or identified as being in an area subject to liquefaction (source: California Division of Mines and Geology). There is no visible or documented evidence of on-site conditions that could result in landsliding or slope failure. Therefore, these issues will not be addressed in the Supplemental EIR.

a) **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

iii) **Seismic-related ground failure, including liquefaction; or**

iv) **Landslides?**

Potentially Significant Impact Unless Mitigation Incorporated. Hoag Hospital is located in a region of historic seismic activity. The Newport-Inglewood Fault, an active fault, and several potentially active faults, are located close to the project site. Existing and planned medical uses would be subject to groundshaking during a seismic event. The geotechnical analysis conducted as part of the Final EIR adequately addressed these potential constraints to provide the City of Newport Beach City Council with an understanding of the potential impacts associated with project implementation. Mitigation measures were adopted as part of the Final EIR to reduce these impacts to a less than significant level.

In addition, the State of California has established “seismic performance” categories for older hospitals (pre-1973 local approved, non-conforming buildings) and new hospitals (post-1973 Office of Statewide Health Planning & Development [OSHPD] approved, conforming buildings). The Structural Performance Categories (SPC) are based on building age, construction type, and physical condition; Non-structural Performance Categories (NPC) are based primarily on the bracing of equipment, fire sprinkler/alarm systems, emergency power, medical gases, and communication systems. Acute care facilities are required to develop and submit a compliance plan to the OSHPD indicating the intent and actions to be taken to ensure compliance. For hospitals constructed before 1973, structural retrofits are required by the year 2008 and non-structural retrofits were to be completed by 2002. The proposed amendment to the Master Plan would not alter the type of uses proposed on the site, nor substantially increase the intensity of the uses. With the implementation of the mitigation measures adopted as part of Final EIR No. 142, no further assessment in the Supplemental EIR is required.

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan amendment project.

Previously Adopted Mitigation Measures

1. Prior to the issuance of a grading permit, the Project Sponsor shall document to the City of Newport Beach Building Department that grading and development of the site shall be conducted in accordance with the City of Newport Beach Grading Ordinance and with plans prepared by a registered civil engineer. These plans shall incorporate the recommendations of a soil engineer and an engineering geologist, subsequent to the completion of a comprehensive soil and geologic investigation of the site. Permanent reproducible copies of the “Approved as Built” grading plans shall be furnished to the Building Department by the Project Sponsor.

2. Prior to the issuance of a grading permit, the Project Sponsor shall submit documentation to the City of Newport Beach Building Department confirming that all cut slopes shall be monitored for potential instabilities by the project geotechnical engineer during all site grading and construction activities and strictly monitor the slopes in accordance with the documentation.
3. Prior to the issuance of a grading permit, the Project Sponsor shall provide to the City of Newport Beach a comprehensive soil and geologic investigation and report of the site prepared by a registered grading engineer and/or engineering geologist. This report shall also identify construction excavation techniques which ensure no damage and minimize disturbance to adjacent residents. This report shall determine if there are any on-site faults which could render all or a portion of the property unsafe for construction. All recommendations contained in this investigation and report shall be incorporated into project construction and design plans. This report shall be submitted to the City for review and approval.
4. Prior to the completion of the final design phase, the Project Sponsor shall demonstrate to the City of Newport Beach Building Department that all facilities will be designed and constructed to the seismic standards applicable to hospital related structures and as specified in the then current City adopted version of the Uniform Building Code.

In addition, Mitigation Measure 5 pertained to geotechnical constraints. This measure requires that prior to the issuance of grading or building permits for each phase of development, the City of Newport Beach Building Department ensure that geotechnical recommendations included in "Report of Geotechnical Evaluation for Preparation of Master Plan and Environmental Impact Report, Hoag Memorial Hospital Presbyterian Campus" prepared by LeRoy Crandall Associates, June 1989, and in the report prepared pursuant to Mitigation Measure 3, are followed. Mitigation Measure 3 (identified above) requires a comprehensive soil and geologic evaluation prior to each grading permit, which would contain recommendations, based on current grading standards and associated codes. Mitigation Measure 5 is duplicative of Mitigation Measure 3 and could result in conflicts with existing codes and practices. It is recommended that Mitigation Measure 5 from Final EIR no longer apply. The measure reads as follows:

5. Prior to the issuance of grading or building permits for each phase of development, the Building Department shall ensure that geotechnical recommendations included in "Report of Geotechnical Evaluation for Preparation of Master Plan and Environmental Impact Report, Hoag Memorial Hospital Presbyterian Campus, 301 Newport Boulevard, Newport, California" as prepared by LeRoy Crandall Associates, June 1989, and in the report prepared pursuant to Mitigation Measure 3, are followed.
- b) **Result in substantial soil erosion or the loss of topsoil? or**
 - c) **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? or**

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Potentially Significant Impact Unless Mitigation Incorporated. As identified in Final EIR No. 142, construction activities would expose soils creating the potential for short-term erosion. In accordance with county and state requirements, as individual construction projects are proposed, the project contractor will be required to implement measures to control short-term potential siltation and erosion on and off of the site. The analysis conducted as part of Final EIR No. 142 adequately addresses the potential geotechnical constraints to provide the City of Newport Beach with an understanding of the potential impacts associated with project implementation. The proposed amendment to the Master Plan would not alter the type of uses proposed on the site or substantially increase the intensity of the uses. With the implementation of the mitigation measures adopted as part of Final EIR No. 142, these impacts would be mitigated to a less than significant level; no further assessment in the Supplemental EIR is required.

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan amendment project.

Previously Adopted Mitigation Measures

9. Prior to issuance of grading permits, the Project Sponsor shall ensure that a construction erosion plan is submitted to and approved by the City of Newport Beach that is consistent with the City of Newport Beach Grading Ordinance and includes procedures to minimize potential impacts of silt, debris, dust and other water pollutants. These procedures may include:
- the replanting of exposed slopes within 30 days after grading or as required by the City Engineer.
 - the use of sandbags to slow the velocity of or divert stormflows.
 - the limiting of grading to the non-rainy season.

The project Sponsor shall strictly adhere to the approved construction erosion control plan and compliance shall be monitored on an on-going basis by the Newport Beach Building Department.

6. Prior to the issuance of a grading permit, the Project Sponsor shall conduct a soil corrosivity evaluation. This evaluation shall be conducted by an expert in the field of corrosivity. This site evaluation shall be designed to address soils to at least the depth to which excavation is planned. At a minimum, at least one sample from each soil type should be evaluated. Appropriate personnel protection shall be worn by field personnel during the field evaluation. In the event soils are found to be corrosive, the source and extent of the corrosive soils shall be determined, and all buildings and infrastructure shall be designed to control the potential impact of corrosive soils over time.
7. Based on the corrosion assessment and source determination, a soils and construction material compatibility evaluation shall be undertaken, concluding with the appropriate mitigation measures and design criteria. Corrosion resistant construction materials are commonly available and shall be used where the evaluation/assessment concludes that corrosive soils conditions could adversely

impact normal construction materials or the materials used for the mitigation of subsurface gas conditions. For example, there are many elastomers and plastics, like PVC, which are resistant to corrosion by up to 70 percent sulfuric acid at 140 degrees Fahrenheit.

8. Should the soil be identified as hazardous due to the severeness of their corrosivity (i.e., a pH less than 2.5), on-site remediation by neutralization shall be undertaken prior to construction. Appropriate regulatory agency approvals and permits shall also be obtained.

Please also refer to Mitigation Measure 106, under the Topic of Air Quality (b).

- e) **Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

No Impact. The proposed project does not require the use of a septic tank or an alternative wastewater disposal system. Therefore, this issue will not be addressed in the Supplemental EIR.

VII. HAZARDS AND HAZARDOUS MATERIALS—Would the amendment to the Hoag Hospital Master Plan Project:

- a) **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Less Than Significant Impact. Hazardous materials are used during medical diagnosis and treatment, research, and facility operation and maintenance. Hazardous materials typically used in small quantities include chemical reagents, solvents, radioisotopes, paints, cleansers, pesticides, photographic chemicals, and biohazardous substances. Similarly, different types of hazardous wastes are generated (usually in small quantities) through these activities. The analysis conducted as part of the Final EIR No. 142 adequately address the potential impacts associated with the use of these materials to provide the City of Newport Beach with an understanding of the potential impacts associated with project implementation. Final EIR No. 142 determined that significant impacts would be mitigated to a less than significant level. In addition, current federal, state, and local regulations pertaining to the handling of such materials would apply. The proposed amendment to the Master Plan would not alter the type of uses proposed on the site or substantially increase the intensity of the uses. With the implementation of the mitigation measures adopted as part of Final EIR No. 142, no further evaluation of this topic is necessary in the Supplemental EIR.

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan amendment project.

Previously Adopted Mitigation Measures

83. Before the issuance of building permits, the Project Sponsor must submit plans to the City of Newport Beach demonstrating that its Hazardous Material and Waste Management Plan and its infectious Control Manual have been modified to include procedures to minimize the potential impacts of emissions from the handling, storage, hauling and destruction of these materials, and that the Project Sponsor has submitted the modified plans to the City of Newport Beach, Fire

Prevention Department, and the Orange County Health Care Agency, as required by the Infections Waste Act and AB2185/2187.

84. Project Sponsor shall continue compliance with its Hazardous Material and Waste Management Program and its Infectious Control Manual for all new activities associated with the proposed Master Plan, as well as comply with all new regulations enacted between now and completion of the proposed Master Plan.
 85. To the satisfaction of the City building official, the Project Sponsor shall expand existing hazardous infectious, radiological disposal facilities to add additional storage areas as necessary to accommodate the additional waste to be generated by the expanded facilities.
 86. The Project Sponsor shall provide evidence to the Planning Director that measures to ensure implementation and continue compliance with all applicable SCAQMD Air Toxic Rules, specifically Rules 1401, 1402, 1403, 1405 and 1415, are being carried out.
 122. The methane gas facility and all building on the lower campus shall be subject to all laws and regulations applicable, including, but not limited to, the Federal Regulation contained in 29 CFR 1910, the State Health and Safety Code, Division 20, Chapter 6.9.5, and the regulations of OSHA and the National Fire Protection Association. Prior to the issuance of building permits on the lower campus, the Project Sponsor shall submit, to the Newport Beach Fire Department a compliance review report of all the above referenced laws and regulations.
- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

Less Than Significant Impact. Implementation of the Hoag Hospital Master Plan assumes that certain existing structures will be demolished and others rehabilitated/ altered. Demolition of buildings and building features could expose construction personnel, staff, patients, and visitors to asbestos-containing building materials and lead-based paint. Because many of the hospital's structures were constructed prior to the mid-1970s when asbestos-containing building materials were being manufactured and used in construction projects, demolition and rehabilitation/alteration efforts may require mitigation to prevent the release of asbestos-containing building materials into the air. The disposition of hazardous materials is subject to regulations set forth at a federal and state level. Because exposure to such materials can result in adverse health effects in uncontrolled situations, several regulations and guidelines pertaining to abatement of and protection from exposure to asbestos have been adopted for demolition activities.

Regulations that will be followed during construction/demolition activities include: (1) SCAQMD Rules and Regulations pertaining to asbestos abatement (including Rule 1403), (2) Construction Safety Orders 1629 (pertaining to asbestos and 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations, Part 61, Subpart M of the Federal Code of Regulations pertaining to asbestos), and (3) lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD).

In accordance with Rule 1403, any demolition work involving asbestos-containing materials must be identified and potential emissions from asbestos must be determined.

In California, asbestos and lead abatement must be performed and monitored by contractors with appropriate certifications from the California DHS. In addition, Cal/OSHA has regulations concerning the use and management of such hazardous materials. Cal/OSHA enforces the hazard communication program regulations. All demolition that could result in the release of lead and asbestos must be conducted according to Cal/OSHA standards.

Final EIR No. 142 notes that the Lower Campus of Hoag Hospital is located in the Newport Beach methane gas mitigation district and that methane gas is a public nuisance and public safety hazard for the Lower Campus and in the immediate vicinity of the site (Balboa Coves). To reduce the odors (hydrogen sulfide) and fire hazard (methane gas), the City of Newport Beach installed an experimental gas collection system and gas burner near Balboa Coves, with subsequent burners and wells installed in 1972 and 1976, respectively. Local effects from methane seeps included minor fires from trapped gas and economic impacts from source control measures and monitoring. Final EIR No. 142 further noted that project development in the Lower Campus could increase gas seepage. A mitigation program was approved as a part of Final EIR No. 412. As a consequence of implementation of the mitigation program, Hoag Hospital is currently constructing a cogeneration facility. One of the functions of the cogeneration facility is to collect and safely reuse methane gas, thereby mitigating safety hazards associated with the presence of methane gas.

Therefore, these issues have been fully addressed in Final EIR No. 142. In addition, the project would be required to adhere to applicable procedures and regulations for the removal and disposal of these materials. The proposed amendment to the Master Plan would not alter the type of uses proposed on the site, nor substantially increase the intensity of the uses. With the implementation of the mitigation measures adopted as part of Final EIR No. 142, no further evaluation of this topic is necessary in the Supplemental EIR.

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan amendment.

Previously Adopted Mitigation Measures

49. In the event that hazardous waste is discovered during site preparation or construction, the Project Sponsor shall ensure that the identified hazardous waste and/or hazardous materials are handled and disposed in the manner specified by the State of California Hazardous Substances Control Law (Health and Safety Code Division 20, Chapter 6.5), standards established by the California Department of Health Services, Office of Statewide Health Planning and Development, and according to the requirements of the California Administrative Code, Title 30, Chapter 22.
52. A soil gas sampling and monitoring program shall include methane and hydrogen sulfide levels. Samples shall be taken just below the depth of actual disturbance. (The individuals(s) performing this initial study may be at risk of exposure to significant- and possibly lethal- doses of hydrogen sulfide, and shall be appropriately protected as required.)

53. A site safety plan shall be developed that addresses the risks associated with exposures to methane and hydrogen sulfide. Each individual taking part in the sampling and monitoring program shall receive training on the potential hazards and on proper personal protective equipment. This training shall be at least at the level required by CFR 2910.120.
54. If the analysis of the initial soil gas samples shows unacceptable levels of hazardous constituents that have the potential to pose a health risk during construction activities, additional gas collection wells shall be drilled to contain and collect the gas.
55. Continuous monitoring for methane and hydrogen sulfide¹
56. A study of other hazardous constituents that may be present in quantities that pose a health risk to exposed individuals shall be prepared and evaluated prior to the initiation of the project. The constituents studied shall include compounds that are directly related to petroleum, such as benzene and toluene.
59. In the event additional gases are to be collected from newly constructed collection wells as part of a measure to reduce exposures during construction, an evaluation of the capacity and efficiency of the present flare system shall be conducted prior to connecting any new sources.
62. A study of the concentration of potential hazardous constituents shall be conducted prior to initiation of the project to characterize the wastewater and any risk it may pose to human health prior to development. A stormwater pollution prevention plan shall be developed to reduce the risk of the transport of hazardous constituents from the site. The Hospital shall apply for coverage under the State Water Resources Control Board's General Permit for Storm Water Discharges Associated with Construction Activity and shall comply with all the provisions of the permit, including, but not limited to, the development of the SWPPP, the development and implementation of Best Management Practices, implementation of erosion control measures, the monitoring program requirements, and post construction monitoring of the system.
63. Soil samples shall be collected from the appropriate locations at the site and analyzed for BTEX and priority pollutants; if the soils are found to contain unacceptable levels of hazardous constituents, appropriate mitigation will be required, including a complete characterization of both the vertical and horizontal extent of the contamination, and a remedial action plan shall be completed and approved by the California Regional Water Quality Control Board. The project Sponsor must demonstrate to the City of Newport Beach compliance with this measure prior to issuance of any permits for Phase I construction activities.
66. Before the issuance of building permits, the Project Sponsor shall submit plans to the Building Department City of Newport Beach, demonstrating that continuous hydrogen sulfide monitoring equipment with alarms to a manned remote location have been provided in building designs. This monitoring equipment must be the

¹ The record shows an incomplete Mitigation Measure 55; however, the provision for continuous monitoring and treatment of methane and hydrogen sulfide is contained in other measures, such as Mitigation Measures 52, 53, 58, 60, 61, 64, 66, 72, 74-76, 79, and 122. Protection from methane and hydrogen sulfide is adequately provided through these measures.

- best available monitoring system, and the plans must include a preventative maintenance program for the equipment and a calibration plan and schedule.
68. Prior to issuance of building permits, Project Sponsor shall submit plans to the City of Newport Beach ensuring that all structures built on the Lower Campus are designed for protection from gas accumulation and seepage based on the recommendations of a geotechnical engineer.
 69. Project Sponsor shall submit plans to the City of Newport Beach indicating where gas test boring will be drilled under each proposed main building site once specific building plans are complete. Such testing shall be carried out, and test results submitted to the City's building official, prior to issuance of grading permits. If a major amount of gas is detected, a directionally drilled well will be permanently completed and put into the existing gas collection system.
 70. Project Sponsor shall submit plans to the Grading Engineer, City of Newport Beach, indicating that all buildings and parking lots on the Lower Campus will be constructed with passive gas collection systems under the foundations. Such a system typically consists of perforated PVC pipes laid in parallel lengths below the foundation. Riser type vents will be attached to light standards and building high points. Additionally, parking lots on the Lower Campus will contain unpaved planter areas and vertical standpipes located at the end of each length of PVC pipe. The standpipes will serve to vent any collected gas to the atmosphere. A qualified geotechnical firm shall be retained to design such systems.
 71. Prior to issuance of building permits, Project Sponsor shall submit plans to the Building Department, City of Newport Beach demonstrating that all buildings on the Lower Campus are sealed from gas migration. Such sealing may be installed by the use of chlorinated polyethylene sheeting or similar approved system. All material of construction including the PVC piping and the ground lining must be evaluated for compatibility with the existing environmental conditions of the soils and/or potential gases.
 72. Prior to issuance of building permits, Project Sponsor shall submit plans to the City of Newport Beach Building and Fire Departments demonstrating that all buildings on the Lower Campus will be equipped with methane gas sensors. Such sensors will be installed in areas of likely accumulation, such as utility or other seldom used rooms. Sensors can monitor on a continuous basis, and can be tied into fire alarm systems for 24-hour surveillance.
 73. To avoid possible accumulation of gas in utility or other seldom used service or storage rooms, Project Sponsor shall submit plans to the City of Newport Beach Building Department prior to issuance of building permits indicating that such rooms are serviced by the build's central air conditioning system (or an otherwise positive ventilation system that circulates and replaces the air in such rooms on a continuous basis).
 74. During construction, Project Sponsor shall ensure that an explosimeter is used to monitor methane levels and percentage range. Additionally, construction contractors shall be required to have a health and safety plan that includes procedures for worker/site safety for methane. If dangerous levels of methane are discovered, construction in the vicinity shall stop, the City of Newport Beach

Fire Department shall be notified and appropriate procedures followed in order to contain the methane to acceptable and safe levels.

100. The Project Sponsor shall ensure that all cut material is disposed of at either an environmentally cleared development site or a certified landfill. Also, all material exported off site shall be disposed of at an environmentally certified development cleared landfill with adequate capacity.

Mitigation Measure 64, adopted as part of Final EIR 142, requires monitoring of the venting systems on the Lower Campus prior to issuance of building permits. The measure requires the findings be sent to State Department of Conservation, Division of Oil and Gas, and the Southern California Air Quality Management District for comment. However, these systems are passive vents, which are not regulated by these agencies. Only the active gas extraction plant is regulated by these agencies. The standard used for passive vents is substantially below the thresholds used by these agencies for monitoring. The portion of the mitigation measure requiring agency reporting has led to confusion regarding what the agencies are expected to do with the results when they are received. Therefore, modification to the wording of the measure is recommended. The recommended changes are shown below. Strikeout text is used to show deleted wording and italic text is used to show wording that has been added. Mitigation Measure 64 would continue to apply to the Hoag Hospital Master Plan.

64. Prior to the issuance of grading of building permits, the Project Sponsor shall evaluate all existing vent systems located on the lower campus and submit this data to the City Building and Fire Departments. ~~the State Department of Conservation, Division of Oil and Gas, and the Southern California Air Quality Management District for comment.~~ Additionally, any proposed new passive vents shall be evaluated by the City Building and Fire Departments prior to the issuance of grading or building permits.

In addition, the following mitigation measures were adopted with Final EIR No. 142 and have been fully implemented. These mitigation measures would no longer need to be tracked through mitigation monitoring.

50. Prior to construction of structures over or near the Wilshire oil well, Project Sponsor shall ensure that the Wilshire oil well, or any abandoned, unrecorded well or pressure relief well, is reabandoned to the current standards. Abandonment plans will be submitted to the State Division of Oil and Gas (DOG) for approval prior to the abandonment procedures. The City's building official shall be notified that the reabandonment was carried out according to DOG procedures.
51. To further determine the source of the gas on the Lower Campus site, prior to issuance of a grading permit on the Lower Campus, Project Sponsor shall collect gas samples from the nearest fire flooding wells and at Newport Beach Townhomes and compare the gas samples to samples taken from the Hoag gas collection wells prior to site grading and construction.
57. A study shall be conducted that characterizes the wells, the influent gas, and the effluent of the flare. This study shall characterize the gas over a period of time, to allow for potential fluctuations in concentration and rate.

58. A scrubber system shall be required to reduce the concentration of hydrogen sulfide in the influent gas.
60. An automatic re-light system shall be installed on the flare system to reduce the risk of a potential release of high concentration of hydrogen sulfide. The system shall be designed with an alarm system that notifies a remote location which is manned 24 hours per day.
61. A continuous hydrogen sulfide monitor that would give warning of a leak of concentrations in excess of acceptable levels shall be installed in the vicinity of the flare.
65. If required by the Southern California Air Quality Air Management District, an air dispersion model shall be required in order to predict the cumulative effects of the emissions. Compliance with any additional requirements of the AQMD shall be verified through a compliance review by the district with written verification received by the Newport Beach Building Department.
67. Prior to issuance of a grading permit, the Project Sponsor shall ensure that the inferred fault traversing the site is trenched and monitored for gas prior to site grading and construction. If gas monitoring indicates a potential risk during grading, additional gas collection wells will be drilled to collect and contain the gas.
75. The project Sponsor may remove the flare system, contain the gas and utilize the gas for Lower Campus facilities. During the containment process and removal of the flare the Project Sponsor shall ensure that methane levels are monitored throughout the project area to ensure that his transition does not create an upset in methane levels or create odors or risk of explosion.
76. Prior to development on the Lower Campus, the Project Sponsor shall submit to the City of Newport Beach within one year of May 1992, plans to install a scrubber system to remove hydrogen sulfide from the influent to the flare. The design and construction of the system should be in accordance with the Best Available Control Technologies, and must be in compliance with SCAQMD (District) Regulation XIII, emission offsets and New Source Review.
77. As required by the District, the Project Sponsor shall develop a sampling and analysis protocol for District approval to evaluate the impact the existing and post-scrubber emissions will have on the ambient air quality and on possible receptor populations. The required evaluation shall include analysis for criteria and toxic pollutants, and evaluation of the potential risk associated with the emission of these pollutants (Rule 1401). Included in the plans for the design of the scrubber system should be a make-up gas source.
78. The plans for the design of the new system will include a calibration and maintenance plan for all equipment, if required by the District as a permit condition, automatic shutdown devices, sensors and charts for continuous recording of monitoring, and flame arresters. The project sponsor shall evaluate enclosing or placing new equipment underground.
79. The Project Sponsor shall submit plans to the City of Newport Beach Building Department that demonstrate that the flare operation will be shut down within

four years of August, 1992. The project sponsor must prepare and obtain approval from the SCAQMD to implement a sampling and analysis protocol for evaluation of the existing emissions from the flare after scrubbing (Mitigation Measures 75 and 76), and the effect of flare shutdown on ambient air quality. The methane gas source should be used, if engineering design allows, as a supplemental source of fuel for the Hospital's boilers. If the gas is not usable, the flare shall be relocated.

80. The plans for the design of the new system will include a calibration and maintenance plan for all equipment, and if required by the District as a permit condition, automatic shutdown devices, sensors and charts for continuous recording of monitoring, and flame arresters. The project sponsor shall evaluation enclosing or placing new equipment underground.
81. Prior to installation of the scrubber system, the Project Sponsor shall develop a protocol for a study to evaluate the integrity of the control equipment and piping. The project Sponsor must obtain agreement from the District on the protocol prior to initiating the study.

In addition, the following mitigation measure was adopted as part of Final EIR No. 142. While the critical care/surgery facility is not being implemented, this measure has already been implemented. Therefore, this measure would no longer apply.

90. In conjunction with the Critical Care Surgery addition, the Project Sponsor will place the overhead power lines located west of the Upper Campus underground if feasible.
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

No Impact. There are no existing or proposed schools within ¼-mile of Hoag Hospital.

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

No Impact. Hoag Hospital is listed on the Environmental Protection Agency (EPA) Facility Index System Database (FINDS). This system was developed by the EPA to be able to cross reference sites for which the EPA maintains files. Not all sites on the list have had a previous violation. For those sites where there has been a prior violation, it has been remediated. No sites with current violations are listed on the FINDS system. (Source: EDR Environmental Resources, Inc., February 22, 2005)

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**

No Impact. The project site is not located within an airport land use plan or within two miles of a public airport/public use airport. No further discussion in the Supplemental EIR is required.

- f) **For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

No Impact. Hoag Hospital has an existing helipad. Helipads are subject to review by the California Department of Transportation Division of Aeronautics (site approval permit and helipad permit), and by the Federal Aviation Administration. No changes to the location of the helipad are proposed as a part of the project. No further discussion in the Supplemental EIR is required.

- g) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Potentially Significant Impact Unless Mitigation Incorporated. The phased implementation of the Master Plan project would, in part, minimize disruptions to services, including the emergency response/evacuation plans. Mitigation Measure 101, adopted as a part of Final EIR No. 142, requires the preparation of a construction phasing plan to ensure that emergency access is maintained during construction activities. A study of on-site circulation will be conducted as a part of the Supplemental EIR; mitigation shall be provided, as required, to mitigate potential impacts related to emergency response and emergency evacuation.

- h) **Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

No Impact. Hoag Hospital is located in an urbanized area. No wildlands are intermixed or adjacent to the site. Therefore, no exposure to people or the project site itself would result; no impacts would occur. This issue will not be addressed in the Supplemental EIR.

VIII. **HYDROLOGY AND WATER QUALITY—Would the amendment to the Hoag Hospital Master Plan Project:**

- a) **Violate any water quality standards or waste discharge requirements?**
- c) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? or**
- d) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site? or**
- f) **Otherwise substantially degrade water quality?**

Less Than Significant Impact. The proposed amendment to the Master Plan project is not expected to generate substantial increases in or the degradation of the quality of runoff because the site is currently developed, and with the exception of landscaping and areas currently subject to construction activities, has limited amounts of impervious surfaces. Final EIR No. 142 addressed the anticipated discharge from the project site. Additionally, the Federal Clean Water Act establishes a framework for regulating

potential surface water quality impacts, mandating sewage treatment, and regulating wastewater discharges, and requires communities and industries to obtain National Pollutant Discharge Elimination System (NPDES) permits to discharge storm water to urban storm sewer systems. The NPDES program is administered by the California Regional Water Quality Control Boards (RWQCB). The Santa Ana Regional Water Quality Control Board (SARWQCB) issued the third term NPDES permit (Order No. R8-2002-0010) governing the public storm drain system discharges in Orange County from the storm drain systems owned and operated by the County of Orange and Orange County cities (collectively “the Co-permittees”) in January 2002. This permit would regulate storm water and urban runoff discharges from proposed development to constructed storm drain systems in the project area dedicated to the City of Newport Beach. The NPDES permit specifies requirements for managing runoff water quality from new development and significant redevelopment projects, including specific sizing criteria for treatment Best Management Practices (BMPs).

To implement the requirements of the NPDES permit, the Co-permittees have developed a 2003 Drainage Area Management Plan (DAMP) that includes a New Development and Significant Redevelopment Program. This New Development and Significant Redevelopment Program provides a framework and a process for following the NPDES permit requirements and incorporates watershed protection/storm water quality management principles into the Co-permittees’ General Plan process, environmental review process, and development permit approval process. The New Development and Significant Redevelopment Program includes a Model Water Quality Management Plan (WQMP) that defines requirements and provides guidance for compliance with the NPDES permit requirements for project specific planning, selection, and design of BMPs in new development or significant redevelopment projects. It is anticipated that the implementation of appropriate point-source structural and non-structural Best Management Practices (BMPs) consistent with the DAMP will ensure compliance with these plans.

The proposed amendment to the Master Plan would not alter the type of uses proposed on the site, nor substantially increase the intensity of the uses. With the implementation of the mitigation measures adopted as part of Final EIR No. 142 and standard regulations associated with the NPDES, the project would not violate water quality standards. No further evaluation of this topic is necessary in the Supplemental EIR.

- b) **Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

Less Than Significant Impact. Hoag Hospital is located outside the main groundwater basin of the Orange County Coastal Plain. Perched groundwater is present in the terrace deposits on the slope of the Lower Campus, at the contact between the marine deposits and Monterey Formation that outcrops at the base of the slope. Ponding of water has been observed at the toe of the slope. Groundwater has been observed in borings at 26 to 44 feet below the ground surface. The presence of groundwater has not been noted in the Upper Campus.

Development in the Lower Campus may require a construction dewatering and subdrain system. A NPDES discharge permit would be required for the discharge of any

groundwater. Final EIR No. 142 determined that potentially significant impacts to groundwater could be mitigated to a level considered less than significant. Mitigation measures adopted as part of Final EIR 142 associated with groundwater and water quality would still apply. This issue will not be addressed further in the Supplemental EIR.

The following measure was adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan amendment project.

Previously Adopted Mitigation Measures

13. Prior to the completion of final construction plans for each phase of Lower Campus development, the Project Sponsor shall submit a comprehensive geotechnical/hydrologic study to the City of Newport Beach Building Department, which includes data on groundwater. This study shall also determine the necessity for a construction dewatering program and subdrain system.

Since the certification of Final EIR No. 142, modifications to how the NPDES permit is administered have been adopted. The State Resources Board is responsible for issuance of the NPDES permit and the RWQCB is responsible for monitoring, if deemed necessary by the permit. Changes to Mitigation Measure 14 are hereby incorporated to reflect this administrative process. The recommended changes are shown below. Strikeout text is used to show deleted wording and italic text is used to show wording that has been added. This measure would continue to apply to the Hoag Hospital Master Plan.

14. Prior to the completion of final building construction plans for each phase of Lower Campus development, the Project Sponsor shall *prepare and* submit a *construction stormwater National Pollution Discharge Elimination System (NPDES) General Permit for stormwater discharge associated with construction activity (Construction General Permit, 99-08-DWQ) and Notice of Intent (NOI) to obtain the required coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity. Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The NOI, site plan, and check in an amount specified by the most current fee schedule shall be sent to the State Water Resource Control Board (SWRCB). The SWRCB will send a Waste Discharger Identification (WDID) to the project sponsor and the Regional Water Quality Control Board Santa Ana Region for use during site inspection, if needed.*~~an application to the Regional Water Quality Control Board for an NPDES permit if a construction dewatering or subdrain program is determined necessary by the Building Department based on the design and elevation of the foundation structures. Also, if dewatering is required by RWQCB, the Program Sponsor shall also conduct groundwater sampling and analysis, and submit it to the California Regional Water Quality Control Board, Santa Ana Region. The results of this testing will assist in determining the specifications for the NPDES permit. The Project Sponsor shall strictly comply with all conditions of any NPDES Permit.~~

- e) **Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

Potentially Than Significant Unless Mitigation Incorporated. Final EIR No. 142 addressed potential changes in drainage patterns and increased runoff associated with implementation of the Master Plan and noted that there was adequate capacity in the drainage system to serve Master Plan buildout. These issues have been fully addressed in Final EIR No. 142. The proposed amendment to the Master Plan would not alter the type of uses proposed on the site or substantially increase the intensity of the uses. Therefore, the drainage patterns and flows would not be substantially different from what was previously addressed in the Final EIR. With the implementation of the mitigation measures adopted as part of Final EIR No. 142, no further evaluation of this topic is necessary in the Supplemental EIR

Previously Adopted Mitigation Measures

9. Prior to issuance of grading permits, the Project Sponsor shall ensure that a construction erosion plan is submitted to and approved by the City of Newport Beach that is consistent with the City of Newport Beach Grading Ordinance and includes procedures to minimize potential impacts of silt, debris, dust and other water pollutants. These procedures may include:

- the replanting of exposed slopes within 30 days after grading or as required by the City Engineer.
- the use of sandbags to slow the velocity of or divert stormflows.
- the limiting of grading to the non-rainy season.

The project Sponsor shall strictly adhere to the approved construction erosion control plan and compliance shall be monitored on an on-going basis by the Newport Beach Building Department.

10. Prior to the issuance of grading permits, the Project Sponsor shall submit a landscape plan which includes a maintenance program to control the use of fertilizers and pesticides, and an irrigation system designed to minimize surface runoff and overwatering. This plan shall be reviewed by the Department of Parks, Beaches and Recreation and approved by the City of Newport Beach Planning Department. The Project Sponsor shall install landscaping in strict compliance with the approved plan.
11. The Project Sponsor shall continue the current practice of routine vacuuming of all existing parking lots and structures and shall also routinely vacuum all future parking lots and structures at current frequencies. Upon implementation of the County of Orange Storm Water Master Plan, routine vacuuming shall be done in accordance with the requirements specified in the plan.
12. Upon completion of final building construction plans, and prior to the issuance of a grading permit for each phase of development, the Project Sponsor shall ensure that site hydrological analyses are conducted to verify that existing drainage facilities are adequate. The applicant shall submit a report to the City of Newport Beach Building Department for approval, verifying the adequacy of the

proposed facilities and documenting measures for the control of siltation and of erosive runoff velocities.

15. Project Sponsor shall strictly comply with its Hazardous Material and Waste Management Program and its Infectious Control Manual for all new activities associated with the proposed Master Plan, as well as strictly comply with all new regulations enacted between now and completion of the proposed Master Plan development.

Please also refer to Mitigation Measure 9 under Geology and Soils (d) and Mitigation Measure 106, under the Topic of Air Quality (b).

- g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

No Impact. There is no existing housing at Hoag Hospital; no housing is proposed as a part of the project.

- h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?**

No Impact. Final EIR No. 142 states the neither the Lower Campus nor the Upper campus are located in a 100-year flood zone. No impacts would occur and no further discussion of this topic is required.

- i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**

- j) Inundation by seiche, tsunami, or mudflow?**

No Impact. Based on the July 2003 study prepared by Earth Consultants International for the City of Newport Beach, the project site would not be subject to inundation by a tsunami even with extreme high tide conditions. The site would also not be subject to inundation as a result of dam failure.

IX. LAND USE AND PLANNING—Would the amendment to the Hoag Hospital Master Plan Project:

- a) Physically divide an established community? or**
- c) Conflict with any applicable habitat conservation plan or natural community conservation plan?**

No Impact. The site is currently developed with medical facilities, and will not displace any land uses unrelated to the existing Hoag Hospital facilities. Further, the project site is not in or contiguous to the natural community conservation plan area. No analysis of this issue is required in the Supplemental EIR.

- b) **Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?**

Potentially Significant Impact. The Supplemental EIR will analyze the project's compatibility with existing and planned land uses adjacent to and in the vicinity of the site, as well as consistency with applicable planning and policy documents. The Supplemental EIR will document existing land uses on the site, as well as uses surrounding the project site. A discussion of the compatibility of the project with surrounding land uses and consistency with applicable planning documents will be provided. The existing General Plan will be used as the basis for the analysis. Given that the type of uses proposed are the same as what is provided for in the Hoag Hospital Master Plan, the evaluation of compatibility will be focused on the uses immediately surrounding the project site. Final EIR No. 142 determined that the project would result in significant, unavoidable impacts on residential units contiguous to the western buildings located in the Upper Campus. The placement of hospital buildings adjacent to the existing residential units, in combination with shade and shadow and noise impacts, were considered significant and unavoidable impacts of the Master Plan project. These impacts were discussed in Final EIR No. 142. The proposed amendment to the Master Plan would not alter or make these impacts more severe. Therefore, while these issues will be addressed in the EIR, they would not constitute a new impact. No new significant impacts to the larger community would be anticipated with the modifications proposed.

The following land use measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan amendment. However, minor modifications to the mitigation measures are proposed to reflect the current status of the project (i.e., the original project has been approved and the City has processed an amendment to the Local Coastal Program to reflect the future development on the Lower Campus). Strikeout text is used to show deleted wording and italic text is used to show wording that has been added.

Previously Adopted Mitigation Measures

24. The proposed project is subject to all applicable requirements of the City of Newport Beach General Plan, Zoning Code and Local Coastal Program (LCP). Those requirements that are superseded by the PCDP and District Regulations are not considered applicable. The following discretionary approvals are required by the City of Newport Beach: EIR certification, ~~adoption of the Master Plan~~, adoption of *an amendment to the Planned Community Development Plan* and District Regulations, approval of *an amendment to the Development Agreement*, ~~approval of a zone change to Planned Community District~~, grading permits, and building permits for some facilities. The California Coastal Development Commission has the discretionary responsibility to issue a Coastal Development Permit for the Lower Campus ~~and a Local Coastal Program Amendment for the Lower Campus~~.

Mitigation Measure 118 was adopted as part of Final EIR No. 142; however, for projects that require issuance of a building permit by the California Office of Statewide Health Planning and Development (OSHPD), the City of Newport Beach has limited jurisdiction in the review and approval of development plans. Therefore, this measure is being revised to indicate that the City of Newport Beach will provide a letter indicating review should such documentation be requested by OSHPD.

118. For any building subject to the issuance of the building permit by the ~~Office of the State Architect~~ *California Office of Statewide Health Planning and Development (OSHPD)*, Hoag Hospital shall submit to OSHPD ~~the State Architect~~ a letter from the City of Newport Beach indicating that review of the construction development plans has been completed and that the plans are in compliance with all City requirements.

In addition, the following mitigation measures were adopted as a part of Final EIR No. 142 and have been implemented. These mitigation measures would no longer need to be tracked through mitigation monitoring.

23. The Project Sponsor shall construct, if feasible and by mutual agreement, and maintain a fence along the common property line west of Upper Campus. The proposed design of the fence shall be reviewed and approved by the City Engineering Department.
113. Subsequent to the approval of this Agreement by the Coastal Commission and the expiration of any statute of limitation for filing a legal challenge to this Agreement, the Master Plan, or the EIR, Hoag shall deposit Two Hundred and Fifty Thousand Dollars (\$250,000) in an account, and at a financial institution, acceptable to City. The account shall be in the name of the City provided, however, Hoag shall have the right to access the funds in the event, but only to the extent that, Hoag constructs or installs the improvements described in (i) or (ii). Funds in the account shall be applied to the following projects (in order of priority upon notice to proceed served by City on Hoag).
- (i) The construction of a sidewalk and installation of landscaping in the CalTrans right-of-way along the west side of Newport Boulevard southerly of Hospital Road;
 - (ii) The construction of facilities necessary to bring reclaimed water to West Newport and/or the Property;

Any funds remaining in the account after completion of the projects described in (i) and (ii) shall be used by the City to fund, in whole or in part, a public improvement in the vicinity of the property.

X. MINERAL RESOURCES—Would the amendment to the Hoag Hospital Master Plan Project:

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

No Impact. The Hoag Hospital site does not contain any known mineral resources (source: City of Newport Beach General Plan). Therefore, this topic will not be addressed in the Supplemental EIR.

XI. NOISE—Would the amendment to the Hoag Hospital Master Plan Project result in:

- a) **Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? or**
- b) **Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? or**
- c) **A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? or**
- d) **A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

Potentially Significant Impact. Final EIR No. 142 addressed the potential noise impacts associated with implementation of the Hoag Hospital Master Plan. However, the proposed amendment would reallocate development from the Lower Campus to the Upper Campus, which would modify the trip distribution on the road network. As a result, traffic volumes on the adjacent roadways may change. This has the potential of changing the traffic noise associated with the project. A noise study will be prepared as a part of the Supplemental EIR to address any changes in findings pertaining to noise impacts from implementation of the Hoag Hospital Master Plan.

Vibration is sound radiated through the ground. The rumbling noise caused by the vibration of room surfaces is called groundborne noise. Certain demolition and construction activities, including the use of pile drivers, can generate short-term groundborne vibration. The potential for this impact will be addressed in the Supplemental EIR.

The following noise measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan amendment.

Previously Adopted Mitigation Measures

- 39. If noise levels in on-site outdoor noise sensitive use areas exceed 65 CNEL, the Project Sponsor shall develop measures that will attenuate the noise to acceptable levels for proposed hospital facilities. Mitigation through the design and construction of a noise barrier (wall, berm, or combination wall/berm) is the most common way of alleviating traffic noise impacts.
- 40. Prior to occupancy of Master Plan facilities, interior noise levels shall be monitored to ensure that on-site interior noise levels are below 45 CNEL. If levels exceed 45 CNEL, mitigation such as window modifications shall be implemented to reduce noise to acceptable levels.
- 41. Prior to issuance of a grading and/or building permit, the Project Sponsor shall demonstrate to the City that existing noise levels associated with the on-site exhaust fan are mitigated to acceptable levels. Similarly, the Project Sponsor shall demonstrate to the satisfaction of the Building Department that all noise levels generated by new mechanical equipment associated with the Master Plan are mitigated in accordance with applicable standards.

42. The City of Newport Beach shall send a letter to each emergency vehicle company that delivers patients to Hoag Hospital requesting that, upon entrance to either the Upper or Lower Campus, emergency vehicles turn off their sirens to help minimize noise impacts to adjacent residents. Hoag Hospital will provide the City with a list of all emergency vehicle companies that deliver to Hoag Hospital.
111. The Project Sponsor shall ensure that all internal combustion engines associated with construction activities shall be fitted with properly maintained mufflers and kept in proper tune.
112. The Project Sponsor shall ensure that construction activities are conducted in accordance with Newport Beach Municipal Code, which limits the hours of construction and excavation work to 7:00 a.m. to 6:00 p.m. on weekdays and 8:00 a.m. to 6:00 p.m. on Saturdays. No person shall, while engaged in construction, remodeling, digging, grading, demolition, painting, plastering or any other related building activity, operate any tool, equipment or machine in a manner that produces loud noises that disturbs, or could disturb, a person of normal sensitivity who works or resides in the vicinity, on any Sunday or any holiday.
117. Use of the heliport/helipad shall be limited to emergency medical purposes or the transportation of critically ill patients in immediate need of medical care not available at Hoag Hospital. Helicopters shall, to the extent feasible, arrive at, and depart from the helipad, from the northeast, to mitigate noise impacts on residential units to the west and south.
119. Non-vehicular activities, such as the operation of the trash compactor, which occur in the vicinity of the service/access road shall be operated only between the hours of 7:00 a.m. and 7:00 p.m. daily.

The following mitigation measures were adopted as a part of Final EIR No. 142 and have been implemented. These mitigation measures would no longer need to be tracked through mitigation monitoring.

114. Rooftop mechanical equipment screening on the emergency room expansion shall not extend closer than fifteen feet from the west edge of the structure and no closer than ten feet from the edge of the structure on any other side.
115. Noise from the emergency room expansion rooftop mechanical equipment shall not exceed 55 dBA at the property line.

The following mitigation measure applied to the critical care/surgery center, which will not be developed. Therefore, this measure would no longer be applicable.

120. Within one year from the date of final approval of the Planned Community District Regulations and development Plan by the California Coastal Commission, as an interim measure, the Project Sponsor shall implement an acoustical and/or landscape screen to provide a visual screen from and reduce noise to adjoining residences from the loading dock area.

The design process for the Critical Care Surgery Addition shall include an architectural and acoustical study to insure the inclusion of optimal acoustical screening of the loading dock area by that addition.

Subsequent to the construction of the Critical Care Surgery Addition, an additional acoustical study shall be conducted to assess the sound attenuation achieved by that addition. If no significant sound attenuation is achieved, the hospital shall submit an architectural and acoustical study assessing the feasibility and sound attenuation implications of enclosing the loading dock area. If enclosure is determined to be physically feasible and effective in reducing noise impacts along the service access road, enclosure shall be required. Any enclosure required pursuant to this requirement may encroach into any required setback upon the review and approval of a Modification as set forth in Chapter 20.81 of the Newport Beach Municipal Code.

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact. The project site is not located within any airport land use plan, and is located more than two miles away from a public or public use airport or private airstrip. No further assessment in the Supplemental EIR is required.

- f) **For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact. The project is not located in the vicinity of a private airstrip. As previously discussed, Hoag Hospital has an existing helipad. The proposed project would not alter the location or demand for helicopter usage. Final EIR No. 142 acknowledges that increases in population, and use of hospital facilities, may result in an increased need for emergency helicopter service. Final EIR No. 142 also states that because this activity is subject to a Conditional Use Permit, it was not considered a part of the project. The amendment does not propose any substantial changes from what was addressed in Final EIR No. 142.

XII. POPULATION AND HOUSING—Would the amendment to the Hoag Hospital Master Plan Project:

- a) **Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Less Than Significant Impact. The proposed project would not generate a substantial growth in population beyond what was addressed in Final EIR No. 142. Final EIR No. 142 identified no impacts in terms of population, employment, or housing. The amount of additional square footage within the Hoag Hospital Master Plan is nominal. The project provides for a reallocation from the Lower to the Upper Campus and an additional 24,215 square feet of medical use on the Upper Campus. The level of development at the Hoag Hospital Campus is consistent with the City General Plan and with regional growth projections. The project does not provide excess infrastructure capacity that would support substantial population growth. The project would provide for

increased employment. Short-term employment opportunities would be available during construction although it is anticipated that these employment opportunities could be filled by the local labor pool. With the overall growth in the size of the facilities at Hoag Hospital, there would be an increase in long-term employment opportunities although this would be expected to be nominal. Although not expected to be significant, the potential for growth inducement on the remaining land on the Hoag Hospital site will be addressed in the Supplemental EIR.

- b) **Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? or**
- c) **Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

No Impact. There is no existing or planned housing at Hoag Hospital. Therefore, no housing or persons will be displaced as a part of the implementation of the proposed Master Plan project. Because the project boundaries are the same as the existing facility, no impacts would occur. This issue will not be addressed in the Supplemental EIR.

XIII. PUBLIC SERVICES

- a) **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

Fire Protection?

Police Protection?

Potentially Significant Impact. The redistribution of development on the site may result in greater traffic volumes at key intersections. The Supplemental EIR will address the potential effects of redistribution of traffic on emergency service access to the site.

The following measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan amendment.

Previously Adopted Mitigation Measures

- 91. Prior to the issuance of grading permits, emergency fire access to the site shall be approved by the City Public Works and Fire Department.
- 94. Prior to the issuance of building permits, the Project Sponsor shall demonstrate, to the satisfaction of the City Fire Department, that all buildings shall be equipped with fire suppression systems.

Schools?

No Impact. The change in intensity of the Upper Campus would not result in impacts to schools. The project is not proposing any uses that would generate additional students.

Parks?

No Impact. As a part of the Master Plan, a 0.28-acre public view park, Sunset View Park, and a 0.52-acre linear view park were provided. The park was provided as a project amenity to the community. No impacts were identified in Final EIR No. 142. The limited additional square footage requested as a part of the project (24,215 square feet) would not result in any new significant impacts.

Other Public Facilities?

No Impact. The project would not be expected to have impacts to other public facilities. No impacts were identified in Final EIR No. 142; the limited additional square footage associated with the proposed project is not expected to result any new significant impacts.

XIV. RECREATION

- a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

No Impact. As previously noted, as a part of the Master Plan, a 0.28-acre public view park, Sunset View Park, and a 0.52-acre linear view park was provided. The park was provided as a project amenity to the community. No impacts were identified in Final EIR No. 142. The limited additional square footage requested as a part of the project (24,215 square feet) would not result in any new significant impacts.

The following mitigation measure was adopted and has been implemented. This mitigation measure would no longer need to be tracked through mitigation monitoring.

47. Prior to issuance of building or grading permits, the Project Sponsor shall make an irrevocable offer to dedicate and grade the proposed linear and consolidated view park as identified in the project description (Figure 3.2.1). The Project Sponsor will dedicate land for a 0.28-acre consolidated view park and a 0.52-acre linear view park.

XV. TRANSPORTATION/CIRCULATION–Would the amendment to the Hoag Hospital Master Plan Project:

- a) **Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)? or**
- b) **Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?**

Potentially Significant Impact. The project has the potential to generate short-term construction-related and long-term operational traffic. A traffic study will be prepared to evaluate implementation of the Hoag Hospital Master Plan project. The traffic study is anticipated to include the following components: 1) identification of existing traffic conditions on the project site and in the traffic study area; 2) evaluation of existing conditions with buildout of the Master Plan; 3) evaluation of future traffic conditions with the addition of cumulative projects but without the proposed project; and 4) evaluation of future traffic conditions with the addition of cumulative projects and the proposed project.

The following traffic measures were adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan amendment.

Previously Adopted Mitigation Measures

25. Subsequent to completion of Phase I of the project, the Project Sponsor shall conduct a Traffic Phasing Ordinance (TPO) analysis for each phase of Master Plan development. The analysis shall identify potential intersection impacts, the proposed project traffic volume contributions at these impacted intersections, and the schedule for any intersection improvements identified as necessary by the study to insure a satisfactory level of service as defined by the TPO. This report shall be approved by the City prior to commencement of that phase of construction.
28. The Project Sponsor shall continue to comply with all applicable regulations adopted by the South Coast Air Quality Management District that pertain to trip reductions such as Regulation 15.
29. The project shall comply with the City of Newport Beach Transportation Demand Management Ordinance approved by the City Council pursuant to the County's Congestion Management Plan.
33. Prior to issuance of precise grading permits for the phase of Master Plan development that includes new, or modifications to existing, internal roadways (other than service roads), the Project Sponsor will prepare an internal circulation plan for submittal to and approval by the Director of Public Works that identifies all feasible measures to eliminate internal traffic congestion and facilities ingress and egress to the site. All feasible measures identified in this study shall be incorporated into the site plan.
35. As each phase of the Master Plan is constructed, the Project Sponsor shall provide each new employee a packet outlining the available ridesharing services and programs and the number of the Transportation Coordinator. All new employees shall be included in the yearly update of the trip reduction plan for Hoag Hospital in compliance with the City of Newport Beach Trip Reduction Plan.²
101. In conjunction with the application for a grading permit, the Project Sponsor shall submit a construction phasing and traffic control plan for each phase of

² The mitigation measure has been updated to reflect the City's Trip Reduction Plan. The original mitigation measure stated, "all applicable regulations adopted by the Southern California Air Quality Management District that pertain to trip reductions such as Regulation 15." Since the project was approved, the South Coast Air Quality Management District has delegated the development and implementation of trip reduction plans to the local jurisdictions.

development. This plan would identify the estimated number of truck trips and measures to assist truck trips and truck movement in and out of the local street system (i.e., flagmen, signage, etc.). This plan shall consider scheduling operations affecting traffic during off-peak hours, extending the construction period and reducing the number of pieces of equipment used simultaneously. The plan will be reviewed and approved by the City Traffic Engineer prior to issuance of the grading permit.

102. The Project Sponsor shall ensure that all haul routes for import or export materials shall be approved by the City Traffic Engineer and procedures shall conform with Chapter 15 of the Newport Beach Municipal Code. Such routes shall be included in the above construction traffic plan.
103. The Project Sponsor shall provide advance written notice of temporary traffic disruptions to affected area business and the public. This notice shall be provided at least two weeks prior to disruptions.
104. The Project Sponsor shall ensure that constructions activities requiring more than 16 truck (i.e., multiple axle vehicle) trips per hour, such as excavation and concrete pours, shall be limited between June 1 and September 1 to avoid traffic conflicts with beach and tourist traffic. At all other times, such activities shall be limited to 25 truck (i.e., multiple axle vehicle) trips per hour unless otherwise approved by the City traffic engineer. Haul operations will be monitored by the Public Works Department and additional restrictions may be applied if traffic congestion problems arise.
108. Prior to issuance of any grading and building permit, the Project Sponsor shall submit a Trip Reduction Plan for construction crew members. This plan shall identify measures, such as ride-sharing and transit incentives, to reduce vehicle miles traveled by construction crews. The plan shall be reviewed and approved by the City Traffic Engineer.

Mitigation Measure 27 stated, "Subsequent to completion of Phase I Master Plan development, the Project Sponsor shall conduct a project trip generation study to be reviewed and approved by the City Traffic Engineer. This study shall analyze whether the traffic to be generated by the subsequent phases of development (Phases II and III) will exceed 1,856 PM peak hour trips when added to the trips generated by the existing (including Phase I) Hoag Hospital development. This study shall be conducted prior to the issuance of any grading or building permits for Phase II or III development." Updating of this measure to reflect the Traffic Phasing Ordinance requirements is recommended; therefore, the following wording will apply to the Hoag Hospital Master Plan:

27. For each phase of Master Plan development, the Project Sponsor shall conduct a project trip generation study prepared in accordance with the Traffic Phasing Ordinance (TPO) guidelines and to be reviewed and approved by the City Traffic Engineer.

In addition, the following mitigation measure was adopted as part of Final EIR No. 142. Mitigation Measure 26 applied to Phase I of the project, which has been implemented. Further tracking of this mitigation measure through the mitigation monitoring program is no longer necessary. New traffic analysis is required for all phases subsequent to

Phase I in compliance with the City Traffic Phasing Ordinance. Therefore, the following measure would not be applicable to the proposed Master Plan amendment project:

26. Prior to issuance of building permits for Phase I of the project, the Project Sponsor shall conduct a project trip generation study, which shall be reviewed and approved by the City Traffic Engineer. This study shall determine if the traffic to be generated by existing plus Phase I development will not exceed 1,338 PM peak hour traffic trips. In the event the Traffic Engineer determines that existing plus Phase I development will generate more than 1,338 PM peak hour trips, the project shall be reduced in size or the mix of land uses will be altered to reduce the PM peak hour trips to, at, or below 1,338.

Mitigation Measure 31 has been implemented. Additionally, Mitigation Measure 34 is redundant to Mitigation Measure 24 and the TPO requirements. Therefore, these measures no longer need to be monitored:

31. Prior to issuance of a grading permit for any of the proposed Master Plan facilities, the Project Sponsor shall implement a program, approved by the City Traffic Engineer, that monitors and manages usage of the Upper and Lower Campus service roads during non-working hours. Such controls may include requesting that the majority of vendors deliver products (other than emergency products) during working hours (i.e., 7:00 a.m. to 8:00 p.m.), signage to restrict use of the road by hospital employees, physicians, patients and visitors during non-working hours, and other methods by which to restrict use. The hospital shall also request that vendors not deliver (i.e., scheduled and routine deliveries) on the weekends.

This restriction specifically applies to scheduled and routine deliveries. The results of this program shall be submitted to the City for review prior to issuance of the grading permit. If the results indicate that such controls do not significantly impact the operations of the hospital, and provided that requests for specified vendor delivery times is consistent with future Air Quality Management Plan procedures, the City may require that the program be implemented as hospital policy. If operation impacts are significant, other mitigation measures would be investigated at the time to reduce service road impacts to the adjacent residential units.

34. Depending on actual site build-out, intersection improvements may be required at the Hospital Road (Upper Campus access) Placentia Avenue Intersection and at the WCH (Lower Campus access) intersection. The need for these improvements shall be assessed during subsequent traffic studies to be conducted in association with Mitigation Measure 25.

- c) **Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? or**
- d) **Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)? or**

e) Result in inadequate emergency access?

Less Than Significant Impact. No changes are proposed in the Master Plan project that would result in unsafe conditions to motorists or pedestrians due to design features or incompatible uses. A study of on-site traffic circulation will be conducted as a part of the Supplemental EIR; mitigation shall be provided, as required, to mitigate potential impacts to emergency access.

The following measure was adopted as a part of Final EIR No. 142 and would apply to the proposed Master Plan amendment.

Previously Adopted Mitigation Measure

95. Prior to issuance of building permits, the Project Sponsor shall demonstrate to the City Fire Department that all existing and new access roads surrounding the project site shall be designated as fire lanes, and no parking shall be permitted unless the accessway meets minimum width requirements of the Public Works and Fire Departments. Parallel parking on one side may be permitted if the road is a minimum 32 feet in width.

Also see Mitigation Measure 91 under Public Services.

f) Result in inadequate parking capacity?

Less Than Significant Impact. In accordance with the *Hoag Memorial Hospital Presbyterian Planned Community Development Criteria and District Regulations* (adopted on May 26, 1992, as amended) all parking for the hospital must be provided on the site in surface lots, subterranean lots, and/or parking structures. Parking requirements are as set forth in the *Planned Community Development Criteria and District Regulations*. The proposed amendments would not alter the parking requirements associated with implementation of the proposed Master Plan project.

Previously Adopted Mitigation Measures

32. Prior to issuance of approvals for development phases subsequent to Phase I, the applicant shall submit to the City Traffic Engineer for his/her review and approval, a study that identifies the appropriate parking generation rates. The findings of this study shall be based on empirical or survey data for the proposed parking rates.

g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

No Impact. Final EIR No. 142 noted that implementation of the Hoag Hospital Master Plan would contribute to an increased demand for public transit. Although Final EIR No. 142 did not consider this to be a significant impact, Mitigation Measure 30 was incorporated to ensure accessibility of transit service for employees, visitors, and patrons of Hoag Hospital. The proposed project would not conflict with any adopted policies supporting alternative transportation. This issue was adequately addressed in Final EIR No. 142 and will not be further evaluated in the Supplemental EIR.

The following mitigation measure was adopted as part of the Final EIR No. 142. Minor modification to the wording of the measure is recommended to reflect that OCTA, not the

City would determine the location for bus turnouts. The recommended changes are shown below. Strikeout text is used to show deleted wording and italic text is used to show wording that has been added. This measure would continue to apply to the Hoag Hospital Master Plan, and would apply to the project, as amended.

Previously Adopted Mitigation Measures

30. In order to ensure accessibility to the available transit services for employees, visitors and patrons of the Hospital, the following transit amenities shall be incorporated into the Master Plan project:

Bus turnouts shall be installed if, ~~and~~ *as* required by the City Traffic Engineer *after City consultation with OCTA*, at all current bus stop locations adjacent to the project site. Bus turnouts shall be installed in accordance with standard design guidelines as indicated in OCTA's *Design Guidelines for Bus Facilities*.

Please also refer to Mitigation Measures 38 and 108 as identified in (a) above.

XVI. UTILITIES AND SERVICE SYSTEMS—Would the amendment to the Hoag Hospital Master Plan Project:

- a) **Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? or**
- b) **Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? or**
- c) **Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects and/or would the project include a new or retrofitted storm water treatment control Best Management Practice (BMP), (e.g. water quality treatment basin, constructed treatment wetlands), the operation of which could result in significant environmental effects (e.g. increased vectors and odors)?**
- d) **Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**
- e) **Result in a determination by the wastewater treatment provider which services or may serve the project that has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Less Than Significant Impact. Final Program EIR No. 142 addressed potential impacts to utility and service systems. The document noted that there was adequate water supply to serve build out of the Master Plan project. Service connections would be taken from the existing 16-inch City water main that runs east-west in a dedicated City easement on the residential side of the property line. Connections are private lines. Further, Final Program EIR No. 142 noted that there is a sewer line in West Coast Highway to serve the project. The potential need to expand the existing 15-inch City sewer trunk main was identified and addressed in Final EIR No. 142.

The following mitigation measure was adopted as part of the Final EIR No. 142 and would apply to the project, as amended.

Previously Adopted Mitigation Measures

92. Prior to the issuance of building permits, the Project Sponsor shall demonstrate that final design of the project shall provide for the incorporation of water-saving devices for project lavatories and other water-using facilities. The Project Sponsor will also comply with any other City adopted water conservation policies.
 93. Prior to issuance of grading permits, a master plan of water and sewer facilities shall be prepared for the site. The Project Sponsor shall verify the adequacy of existing water and sewer facilities and construct any modifications or facilities necessitated by the proposed project development.
- f) **Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? or**
- g) **Comply with federal, state, and local statues and regulations related to solid waste?**

Less than Significant. Final EIR No. 142 did not identify any significant impacts with regarding the ability to provide adequate disposal capacity for municipal solid waste and infectious waste material. The project would not substantially alter the amount of solid waste being generated by the project. New regulations pertaining to solid waste disposal have been implemented since the certification of Final EIR No. 142. The California Integrated Waste Management Board requires that all counties have an approved Countywide Integrated Waste Management Plan (CIWMP). To be approved, the CIWMP must demonstrate sufficient solid waste disposal capacity for at least fifteen years, or identify additional capacity outside of the county's jurisdiction. Orange County's CIWMP, approved in 1996, contains future solid waste disposal demand based on the County population projections adopted by the Board of Supervisors. The Orange County landfill system has capacity in excess of 15 years. Though no significant impact is anticipated as a result of the project, the following new mitigation measure would apply to the project to further reduce impacts on County land fills.

New Mitigation Measure

During project construction, the contractor shall be required, to the extent practicable, to take concrete and asphalt from project demolition to an off site recycling location to minimize impacts to existing landfills. The contractor shall provide the City of Newport Beach Building Department verification that the materials have been recycled.

References

- Environmental Data Resources, Inc. February 22, 2005. *EDR Site Report for 1 Hoag Drive, Newport Beach, California*. Prepared for the BonTerra Consulting, Costa Mesa, California.
- LSA Associates, Inc. 1992. *Final Environmental Impact Report No. 142 for Hoag Hospital Master Plan, SCH #89061429*. Prepared for the City of Newport Beach, California.

Newport Beach, City of. October 24, 1988, as amended. *Land Use Element of the City of Newport Beach.*

Newport Beach, City of. May 26, 1992. *Hoag Memorial Hospital Presbyterian Planned Community Development Criteria and District Regulations.*

South Central Coastal Information Center. February 22, 2005. *Hoag Hospital Records Search.*
Prepared for BonTerra Consulting, Costa Mesa, California.



Southern California
Gas Company
1919 S. State College Blvd.
Anaheim, CA 92806-6114



April 20, 2005

Hogle-Ireland, Inc.
42 Corporate Park, Suite 250
Irvine, CA 92606

Attention: David Lepo, Contract P.M.

Subject: EIR - Hoag Hospital Master Plan Amendment, City of Newport Beach

Thank you for providing the opportunity to respond to this E.I.R. (Environmental Impact Report) Document. We are pleased to inform you that Southern California Gas Company has facilities in the area where the aforementioned project is proposed. Gas service to the project can be provided from an existing gas main located in various locations. The service will be in accordance with the Company's policies and extension rules on file with the California Public Utilities Commission when the contractual arrangements are made.

This letter is not a contractual commitment to serve the proposed project but is only provided as an informational service. The availability of natural gas service is based upon conditions of gas supply and regulatory agencies. As a public utility, Southern California Gas Company is under the jurisdiction of the California Public Utilities Commission. Our ability to serve can also be affected by actions of federal regulatory agencies. Should these agencies take any action, which affect gas supply or the conditions under which service is available, gas service will be provided in accordance with the revised conditions.

This letter is also provided without considering any conditions or non-utility laws and regulations (such as environmental regulations), which could affect construction of a main and/or service line extension (i.e., if hazardous wastes were encountered in the process of installing the line). The regulations can only be determined around the time contractual arrangements are made and construction has begun.

Estimates of gas usage for residential and non-residential projects are developed on an individual basis and are obtained from the Commercial-Industrial/Residential Market Services Staff by calling (800) 427-2000 (Commercial/Industrial Customers) (800) 427-2200 (Residential Customers). We have developed several programs, which are available upon request to provide assistance in selecting the most energy efficient appliances or systems for a particular project. If you desire further information on any of our energy conservation programs, please contact this office for assistance.

Sincerely,

Mike Harriel
Technical Supervisor
Pacific Coast Region

MH/nh
cir05.doc

Ribaudo
260 Cagney Lane No. 320
Newport Beach, CA 92663

9 May 2005

Mr. David Lepo, Contract Project Manager
Hogle-Ireland, Inc.
42 Corporate Park, Suite 250
Irvine, CA 92606

Dear Mr. Lepo,

My wife and I have lived in Villa Balboa since 1983. We have lived through every aspect of the Hoag Hospital development. After many hours of participation in meetings at every city level an agreement was made which allowed the hospital to develop both the upper and lower campuses. This was done in 1992, and it allowed the maximum amount of square footage for both the lower and upper campuses. The City of Newport Beach and our community gained only one thing, and that was height limitations of the buildings scheduled for the lower campus. This was a hard fought battle, but an agreement was made. Public views were protected because of the park built on the ridge above the lower campus.

Sometime before the Women's Pavilion on the upper campus was built, the hospital came back with the first amendment to the agreement and asked for an increase in square footage because they didn't realize the area zoned for earthquake protection would take space away from active care areas. That in itself is hard for me to believe, but the additional square footage was granted.

Then came a request from Hoag that they wanted to build a co-generating plant (power plant) on the far end of their property. This was granted in spite of some of the emissions from the plant being above what is allowed for a manufacturing facility. I speak of Reactive Organic Gasses or V.O.C.s (Volatile Organic Compounds). The South Coast Air Quality Management District states that 50 lbs of this material will be emitted daily, whereas Raytheon Corporation in El Segundo is limited to 10 lbs. per day, according to AQMD's Rule 1122. Our question is, why would the AQMD allow Hoag to emit 50 lbs. of V.O.C.s per day while limiting a manufacturing facility to only 10 lbs. per day.

Now the hospital wants the additional square feet of area that the power plant took for more dense development on both upper and lower campuses.

5-9-05

Mr. David Lepo

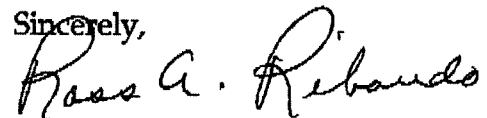
page two

Every time the hospital asks for more area for any reason they usually get their way, and that is really upsetting, especially when every time the question of increased traffic is brought up we are told, "There will be no significant increase in traffic due to this particular expansion". One only has to stand at the corner of Superior and Hospital Rd. to see the increase in traffic.

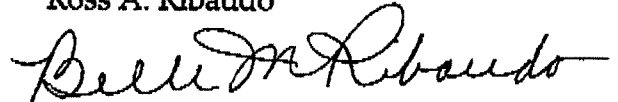
Please consider not granting this amendment until a thorough study is done on traffic and noise. This cannot be done until after the Women's Pavilion is open and operating on a 24/7 basis. Currently an empty building cannot be put into the equation.

It is understood that the power plant will not generate any traffic, but it will generate a lot of other things. See attached sheet from AQMD.

Sincerely,



Ross A. Ribaud



Belle M. Ribaud

:b

cc: C. Ouellette - Villageway Management



South Coast Air Quality Management District

21865 E. Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

NOTICE OF INTENT TO ISSUE "PERMIT TO CONSTRUCT and OPERATE" PURSUANT TO RULE 212

This notice is to inform you that the South Coast Air Quality Management District (AQMD) has received applications for permit to construct and operate three natural-gas fired internal combustion engines and one natural gas/fuel oil (amber oil 363) fired boiler at a location in your neighborhood. The AQMD is the air pollution control agency for all of Orange County and portions of Los Angeles, Riverside and San Bernardino Counties. Anyone wishing to operate, install or modify equipment that could be a source of air pollution within this region must first obtain a permit from the AQMD. Rule 212 requires the applicant for certain projects, such as this one, to distribute and publish a public notice prepared by the AQMD prior to the issuance of a permit.

The AQMD has evaluated the permit applications for the following equipment and determined that the equipment will meet all applicable air quality requirements of our Rules and Regulations.

Company Name:	HOAG MEMORIAL HOSPITAL PRESBYTERIAN
Application Nos.:	406575, 406576, 406577 & 406578
Location Address:	ONE HOAG DR., NEWPORT BEACH, CA 92658
Project Description:	THREE NATURAL GAS FIRED INTERNAL COMBUSTION ENGINES AND A NATURAL GAS/FUEL OIL (AMBER 363) FIRED BOILER

This project will use the best available technology for controlling air pollution. Our calculations show that a maximum of 52 pounds of Nitrogen Oxides, 93 pounds of Carbon Monoxide, 50 pounds of Reactive Organic Gases (ROG), 18 pounds of Particulate Matter under 10 microns (PM10), and 1 pound of Sulfur Oxides will be emitted from the project described above in any one day. Generally, the amount will be less. But even at the maximum amount, this project complies with all aspects of the AQMD's air pollution control requirements. Detailed computer modeling has shown that the proposed project should have no adverse impact on the surrounding community.

This project also emits pollutants that are identified as to cause cancer. Therefore, a health risk assessment was performed for these permit applications. The calculation overestimates actual risk since it assumes that a person is at the location of highest exposure for an entire lifetime (24 hours/day, 365 days/year for 70 years). Even assuming this unlikely condition, the evaluation shows that the chance of this project causing cancer is less than twenty seven in-a-million which is within limits considered acceptable for new/modified sources.

The air quality analysis of this project is available for public review at the AQMD's headquarters in Diamond Bar, and at the Library in City of Newport Beach at 1000 Avacado Avenue. Information regarding the facility owner's compliance history submitted to the AQMD pursuant to California Health & Safety Code Section 42336, or otherwise known to the AQMD, based on credible information, is also available from the AQMD for public review. Anyone wishing to comment on the proposed issuance of this permit should submit his or her comments in writing within 30 days of the distribution date shown below. If you are concerned primarily about zoning decisions and the process by which this facility has been sited at this location, you should contact your local city or county planning department. Please submit comments related to air quality to Mr. Hemang Desai, Air Quality Engineer, General Commercial Team, South Coast Air Quality Management District, 21865 E. Copley Drive, Diamond Bar, California 91765-4182. For additional information, please call Mr. Hemang Desai at (909) 396-2596.

Distribution Date: January 17, 2003

DEPARTMENT OF TRANSPORTATION
District 12
3337 Michelson Drive, Suite 380
Irvine, CA 92612-8894
Tel: (949) 724-2267
Fax: (949) 724-2592



*Flex your power!
Be energy efficient!*

FAX & MAIL

May 11, 2005

Mr. David Lepo
City of Newport Beach
3300 Newport Boulevard
Newport Beach, CA 92663

File: IGR/CEQA
SCH#: 19991071003
Log #: 1546
SR #: PCH

Subject: Hoag Hospital Master Plan Amendment

Dear Mr. Lepo,

Thank you for the opportunity to review and comment on the Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) for the Hoag Hospital Master Plan Amendment. The project consists of amendment of the Development Agreement between the City of Newport Beach and Hoag Memorial Hospital, to increase the maximum allowable building area for the Hoag Hospital site. The project site is located on One Hoag Drive in the City of Newport Beach. The nearest State Routes to the project are Pacific Coast Highway (PCH) and SR-55.

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

The Transportation/Circulation Section of the NOP indicates that the project has the potential to generate short-term construction-related and long-term operational traffic and that a traffic study will be prepared. The traffic study should include existing and future average daily traffic volumes and peak-hour analysis for all affected state highway facilities. The referenced analysis should be performed based on methodologies shown in the Highway Capacity Manual. In order to further assist you with the analysis we have enclosed the Caltrans Guide for Preparation of Traffic Impact Studies (TIS).

Please continue to keep us informed of any future developments, which could potentially impact the state transportation facilities. If you have any questions related to the above comments, please do not hesitate to contact Maryam Molavi of my staff at (949) 724-2267.

Sincerely,

ROBERT F. JOSEPH, Chief
IGR/Community Planning Branch

Post-it® Fax Note	7871	Date	5-12-05	# of pages	1
To	David Lepo	From	M. Molavi		
Co./Dept	City Newport Bch	Co.	Caltrans D-12		
Phone #		Phone #	724-2267		
Fax #	949-644-3229	Fax #			

Fax: 949-553-0935 (Hogle-Ireland)

- C: Terry Roberts, Office of Planning and Research
- Terri Peacock, Caltrans HQ IGR/Community Planning
- Gale McIntyre, District 12 Deputy Director of Planning
- Isaac Alonso Rice, Traffic Operations South
- Praveen Gupta, Environmental Planning

MEMORANDUM

To: James Campbell, Senior Planner, City of Newport Beach

From: Environmental Quality Affairs Citizens Advisory Committee ("EQAC")
City of Newport Beach

Subject: **Notice of Preparation ("NOP") for the Hoag Hospital Master Plan Amendment (the "Project") for the City of Newport Beach ("City")**

Date: May 17, 2005

Thank you for the opportunity to comment on the NOP for the Hoag Hospital Master Plan Amendment. Listed below are our comments.

Project Description

The NOP contains an incomplete and confusing proposed Project description, which the Supplemental Environmental Impact Report ("SEIR") should complete and clarify.

The Project Description identifies the "General Plan Maximum allowable building areas" as 765,349 square feet for the Upper Campus and 577,889 square feet for the Lower Campus. The NOP proposes adding 5,592 square feet to the Lower Campus building area (bringing it to 583,481 square feet.) as the result of vacation of an unused easement by the City. (Page 2) The SEIR should clarify the location of the easement, identify who owns the underlying fee and describe the current easement use.

The Project Description further proposes the addition of 24,215 square feet to the building area because the existing cogeneration facility is "non-occupied" and "does not materially increase vehicle trip generation." It is unclear what "non-occupied" means. The SEIR should describe the current use for the cogeneration facility and provide a clear comparison of the current vehicle trip generation and the change due to the proposed Project. Further, the SEIR should clarify how the addition of the addition of the 24,215 square feet would not create additional vehicle trip generation.

The total allowable building area now is 1,343,238 square feet of development. This doesn't include, because of the 2002 amendment, "buildings" that are "non-occupied." The SEIR should clarify how much of the current allowable 1,343,238 square feet is built at this time.

The NOP states that the addition of both of these areas would increase maximum allowable building area on the Upper and Lower Campuses to 1,373,045 square feet.

However, the document proposes a maximum Upper Campus building area of 990,349 square feet and a maximum Lower Campus building area of 583,481 square feet. This represents a total of 1,528,830 square feet of maximum allowable building area, but the NOP states: "In no event could the building areas of both the Upper and Lower Campuses exceed 1,373,045 square feet." This discrepancy should be clarified in the SEIR. The SEIR should include the site plan on the Upper and Lower Campuses, including plans for a new and/or expanded cogeneration facility. (Page 3)

The Project Description section states: "Other changes may be required in the Hoag Hospital PC text to reflect and be consistent with changes to the Development Agreement and General Plan indicated above and/or to provide clarification of standards applicable to future development approvals." Given the discrepancy in the maximum allowable building area cited above, there are concerns that the "other changes" may be related to this additional 155,785 square foot of development rights above the alleged "maximum," and that these other changes may not be included in the traffic report or other studies that assess the proposed Project's impacts. Again, the SEIR should fully address and clarify this discrepancy in the maximum allowable building area. (Page 3)

Environmental Checklist

Aesthetics

This section addresses the potential aesthetic impacts associated with the proposed Project. The Upper Campus construction will be sited over the existing footprint (after demolition), and while it will be higher, it does not exceed existing maximum building height or setbacks. A landscaping plan will require screening equipment and trash from public view, clean rooftops (no mechanical equip) and softening the architecture with plantings.

According to the NOP, several mitigation measures associated with aesthetics that were adopted for Final EIR No. 142 will apply to the proposed Project. Mitigation Measure 48 states that "(p)rior to issuance of a building permit for any Lower Campus structure, the Project Sponsor shall prepare a study of each proposed building project to assure conformance with the EIR view impact analysis and the PCDP and District Regulations, to ensure that the visual impacts identified in the EIR are consistent with actual Master Plan development." The SEIR should fully address these view impacts. The study of each proposed building project should be included in the SEIR.

While care has been taken to minimize light spillage and concealment of light sources, given the close proximity of residential housing on the both campuses, the SEIR should include restrictions on all non-essential lighting. For example, the SEIR should provide a mitigation measure that would restrict architectural lights after 10:00 PM.

Air Quality

The NOP deals with air quality issues in and around the proposed Project area and ends with a commitment to identify “sensitive receptor areas within the proposed Project vicinity.” The SEIR should expand the commitment to include receptors in the adjacent neighborhoods, where there is a heavy concentration of residential housing, and should include a commitment to any necessary mitigation. (Page 16)

The NOP further proposes “increasing the capacity of the cogeneration facility that serves the hospital.” The size and location of this facility should be detailed in the SEIR so that factors in addition to air quality can be evaluated. Specifically, noise impacts of this increased size cogeneration facility should be addressed in detail in Section XI – Noise. (Page 16)

Mitigation measures 37, 88, 96, 97, 98 and 99 put heavy emphases on “energy efficiency” items in the Air Quality section of this NOP. It is not clear why these measures are included in this section unless they relate to a plan to add on-site electrical power generation equipment. If this is so, the cogeneration facility must be planned for expansion, and all aspects this should be discussed in detail in the SEIR. (Pages 17 and 18)

This section states that the City, not the applicant, is responsible for California Environmental Quality Act (“CEQA”) documentation related to “new significant impacts” resulting from the proposed Project, and the applicant proposes to transfer its responsibility for generation of this CEQA documentation to the City. Please identify the CEQA reference that authorizes this transfer of responsibility. Also, please confirm that “air quality analysis” identified in the top paragraph on Page 19 is to be conducted by the Project Sponsor. (Pages 18 and 19)

The NOP proposes elimination of mitigation measure 109 because the Air Quality Management Plan (“AQMP”) has now been approved and obviates the need for it. Since the AQMP is used here and elsewhere in the NOP to relieve the Project Sponsor of various documentation and reporting requirements, specific references to AQMP sections should be cited in the SEIR if they are being used to eliminate previously approved Project Sponsor obligations. (Page 20)

The NOP states that no “objectionable odors” are anticipated from the proposed Project and that this issue will not be addressed in the SEIR. Since the proposed Project is in the vicinity of active seismic faults and producing oil fields, it seems that there is risk of releasing underground gases during some deep excavation and/or construction activities. Proof should be presented to assure that the “no objectionable odors” position by the Project Sponsor is substantiated by reliable data. (Page 21)

Hazards and Hazardous Materials

According to the NOP, the majority of hazards and hazardous materials issues have been adequately addressed in the analysis conducted as part of the Final EIR No. 142. However, the Hazards and Hazardous Materials section states that there is one area that would have a significant impact unless appropriate mitigation is implemented. Subsection g states: "Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan." Mitigation Measure 101 "requires the preparation of the construction phasing plan to ensure that emergency access is maintained during construction activities." The SEIR should include a detailed plan of action, more than the discussed study of on-site circulation, to discuss the emergency response and evacuation plans during the construction process as to not stress and/or cause more damage in the event of a site or neighboring emergency.

Hydrology and Water Quality

This section focuses on potential impacts to surface water hydrology, surface water quality, groundwater hydrology, and groundwater quality resulting from the development of the proposed Project.

Subsections a, b, c, d, e, and f should all be viewed as "Potential Significant Impact" as the upper area could be increased by almost 30 percent. This 30 percent increase represents an area of 225,000 square feet, which on its own is considered to be a significant area. The SEIR should evaluate all of these areas in-depth with the new highest possible numbers.

Land Use and Planning

This section states that the impacts of "placement of hospital buildings adjacent to the existing residential units, in combination with shade and shadow and noise impacts, were considered significant and unavoidable impacts of the Master Plan project" and were discussed in Final EIR No. 142. The section goes on to say that "(t)he proposed amendment to the Master Plan would not alter or make these impacts more severe...No new significant impacts to the larger community would be anticipated with the modifications proposed." (Page 41)

The SEIR should fully discuss and analyze how the changes to the Master Plan that are proposed with this Project do not alter or make the land use impacts more severe to the surrounding residential community.

Noise

Mitigation Measure 40 proposes to mitigate interior noise levels over 45 CNEL “prior to occupancy of Master Plan facilities.” This seems to be a poor approach to noise mitigation since noise reduction/elimination at the source should be first priority. It may be expensive (or impossible) to solve the noise reduction problems “after the fact” rather than incorporating noise reduction measures into the initial design and construction processes. (Page 43)

Subsection f of this section asserts that there will be no noise impact due to usage of the helipad. Since “EIR 142 acknowledges that increases in population, and use of hospital facilities, may result in an increased need for emergency helicopter service,” the SEIR should, at least, discuss the impact of future increased emergency helicopter service commensurate with the increases in utilization that are implicit in the Hoag Hospital Master Plan. If future noise mitigation is needed, some measures might be implemented now that may be more difficult or not cost effective later. (Page 45)

Public Services

The Public Services section states that fire protection and police protection may be significantly impacted by the proposed Project, and it states that the mitigation measures that were adopted for Final EIR No. 142 would apply to the proposed Project. The SEIR should fully analyze the impacts of the proposed Project on “service ratios, response times and other performance objectives for any of the public services.” Further, the SEIR should provide a full discussion of the applicability of the mitigation measures that were adopted for Final EIR No. 142 to the proposed Project.

Transportation/Circulation

The NOP is unclear about the amount and location of parking required for the proposed Project. This section states that the proposed amendment would not alter the parking requirement. However, there is not enough information provided in the NOP for decision makers and the public to make such a determination.

The earlier plan for the Hoag Hospital Master Plan had an entirely different allocation of development between the Upper Campus and Lower Campus. With the new criteria and allocation of development between the Upper Campus and Lower Campus, the parking should be discussed in detail to insure that adequate parking would be provided in each respective area.

The SEIR should indicate: (a) the required parking for the requested square footage currently allowed; (b) the required parking for the requested square footage in the amended plan; (c) where the parking is located and the number of spaces in each location; (d) the number of spaces restricted for parking for doctors only and their location; (e) the number of spaces restricted for parking to employees and where they are located; (f) the location of

available visitor and patient parking and the number of spaces. The SEIR should clarify that the parking requirements for the Upper Campus and Lower Campus will be met. (Page 51)

The Transportation/Circulation section states that the traffic study that will be prepared to evaluate implementation of the Hoag Hospital Mast Plan Project will include an "evaluation of future traffic conditions with the addition of cumulative projects and the proposed project." The NOP does not indicate how the "cumulative projects" will be identified. The SEIR should clearly identify the cumulative projects being used and discuss the criteria used to identify them as such.

Mitigation Measure 34 describes specific intersections where improvement may be needed. These intersections, even if improved pursuant to Mitigation Measure 34 as part of the earlier master plan, should, nonetheless, be included in the list of intersections to be evaluated in the SEIR traffic study. (Page 50)

It would be helpful to persons evaluating the study and the SEIR to have the prior traffic studies and internal circulation studies that were submitted to the Director of Public Works and the City Traffic Engineer attached as exhibits to the new traffic study to be prepared pursuant to this SEIR.

The trip reduction plan for the construction crew members that was submitted earlier with EIR No. 142 should be attached as an exhibit to the new traffic study prepared pursuant to this SEIR. The term "transit incentives" as used in Mitigation Measure 108, should be explained and detailed.

The text preceding Mitigation Measure 26 indicates that the Measure would not be applicable to the proposed Project, and the Committee agrees. However, a copy of the study given to and approved by the City Traffic Engineer should be attached as an exhibit to the traffic study for this SEIR. (Page 50)

The text following Mitigation Measure 26 On page 50 under paragraph no. 26 references Mitigation Measure 24. However, Mitigation Measure 24 is not addressed in the NOP. (Page 50)

The NOP lists ten traffic measures that were adopted as part of Final EIR 142 and states that they would apply to the proposed Project. The traffic study for the SEIR should address all ten traffic measures in light of the additional impacts associated with the proposed Project, and if necessary, propose additional mitigation measures.

Utilities and Service Systems

This section analyzes the ways in which the proposed Project will strain the existing utilities and services. It looks at whether the proposed Project will exceed wastewater treatment requirements, require the construction of new water storm water drainage facilities, have sufficient water supplies and capacity to serve the projected

demand and whether there will be sufficient solid waste disposal capacity.

The NOP considers that each of these potential environmental issues have less than significant impact based upon Final Program EIR No. 142, stating that there was adequate water supply and adequate sewer and service connections to serve build out of the Master Plan project. It also notes that there would be a potential need to expand the existing 15-inch City sewer trunk main. Final EIR No. 142 then indicated that the project would not substantially alter the amount of solid waste generated by the project.

These assertions are generalities, and the SEIR needs to narrow them to more specifically address the proposed Project. The SEIR should address more than the incorporation of water-saving devices for project lavatories and other water-using facilities and take into consideration any external or unexpected instances which would require increased water drainage and/or increased solid waste disposal.

As a new mitigation measure, the NOP notes that the contractor shall be required, to the extent practicable, to take the project demolition waste to an off site recycling location to minimize impacts to existing landfills and will require verification. The SEIR should emphasize this point and find language more persuasive to encourage participation.

Mandatory Findings of Significance

This section analyzes the mandatory findings, including the proposed Project's impact on and degradation of the environment, cumulative impacts and any impacts which may cause substantial adverse effects on human beings.

Although the Environmental Checklist notes that the proposed Project may result in potentially significant impacts for each category, the NOP does not contain a section that addresses those impacts or proposed mitigation. The SEIR should fully discuss and analyze the proposed Project's impact on and degradation of the environment, cumulative impacts and any impacts which may cause substantial adverse effects on human beings and propose appropriate mitigation.

**JOHN P. AND SUZANNE V. CHAMBERLAIN
260 CAGNEY LANE - UNIT 304
NEWPORT BEACH, CALIFORNIA 92663
949.476.9303**

May 17, 2005

BY FEDERAL EXPRESS

David Lepo
Contract Project Manager
HOGLE-IRELAND, INC.
42 Corporate Park
Suite 250
Irvine, CA 92606

RE: Notice of Preparation dated April 15, 2005
Hoag Hospital Master Plan Amendment

Dear Mr. Lepo:

As is apparent from its content and those References listed at pages 61 to 62 of the document, the Notice of Preparation was drafted without taking into account either the existence or context of the Development Agreement Between the City of Newport Beach and Hoag Memorial Hospital Presbyterian ("Development Agreement"). It is by virtue of the Development Agreement--of which adjoining residents are expressly made third party beneficiaries--that any and all development on the Hoag Memorial Hospital Presbyterian ("Hoag") site proceeds.¹ In that this seminal document, i.e., the

¹Section 1.6 of the Development Agreement provides, " ... This Agreement is also consistent with the purpose and intent of state and local laws authorizing development agreements in that it represents comprehensive planning, provides certainty in the approval of subsequent projects subject to compliance with conditions, reduces the economic costs of development by providing assurance to Hoag that it may generally proceed with projects in accordance with existing regulations, and provides assurance to adjoining property owners that limits on the height of structures and amount of development as specified in the Master Plan and this Agreement will remain in full force and effect for a period of twenty-five (25) years (emphasis added)."

Development Agreement was not consulted and utilized in the making of the Notice of Preparation ("Notice"), the Notice itself is at least suspect, most likely defective.

Article 6. General Provisions, Section 6.5 of the Development Agreement does allow its amendment from time to time. Any amendment, however, is subject to subsection (b) which states:

The City Counsel shall not approve, and Hoag shall not request, any amendment to the provisions of the Master Plan or this Agreement that would increase the maximum permitted gross floor area or the maximum permitted building height (within any lettered building envelope) above that established by the Master Plan as of the Effective Date of this Agreement. This Subsection shall prevail over any conflicting ordinance, resolution, policy or plan adopted by the City Council.

As the Notice states at page 5, in connection with the "Project Description," "[t]he project consists of [amendments which] would allow the Newport Beach City Council the discretion to approve a request by Hoag Hospital to ... increase the maximum allowable building area on the Hoag Hospital site ... "

Neither the phrase "permitted gross floor area" or the phrase "maximum allowable building area" are terms defined by the Development Agreement.² As such, they retain their usual meaning and interpretation and are, therefore, synonymous in regular parlance. The language of Section 6.5 is mandatory in that it utilizes "shall." Any request by Hoag and any entertaining of such request by the City, would appear to constitute breach of the express terms of the Development Agreement. Therefore, any increase of square footage, for whatever reason, cannot be allowed per the provisions governing development on the Hoag site.

Section 1.6 resides in Article 1. Recitals. At Article 11. Miscellaneous Provisions, Section 11.6, all provisions set forth at "Recitals" are expressly made a part of the terms of the Development Agreement.

Section 8.1 of the Development Agreement provides, "[i]n addition, the Master Plan and this Agreement confer benefits on the public and **nearby residents by imposing long term restrictions on the height, amount and location of development ...** (emphasis added)."

²The Hoag Memorial Hospital Presbyterian Planned Community Development Criteria and District Regulations (referred to in the Notice of Preparation and hereinafter as "PC Text") is Exhibit C to the Development Agreement and its terms made a part thereof. In the Development Agreement, the PC Text or Exhibit C is referred to as the "Master Plan."

In discussing the "Project Background," at page 5, the Notice states, "[i]n 2002, the City Council approved the first amendment to the PC text. The first amendment changed the definition of 'Gross Floor Area Entitlement' so that certain non-occupied building areas are not counted toward the maximum permissible building floor areas for the project site."

As with the phrases "permitted gross floor area" and "maximum allowable building area" discussed above, the phrase "gross floor area entitlement," is not a defined term within the Development Agreement. That this phrase is set forth in the Notice as a defined term and is expressly represented to be a defined term, indicates a lack of accuracy in the Notice document.

Further, based on the mandatory prohibition embodied in Section 6.5 discussed above, it is clear that Hoag violated the provisions of the Development Agreement by even requesting such an amendment, adding as it did to the gross floor area, and that the City Council exceeded its authority in granting such an amendment. The use of "amendment" and implying that such is possible in that it has been done before, is yet another misrepresentation utilized by the Notice to mislead and lull the reader into acquiescence to the development requests. In addition, by requesting and allowing the increase in floor area relevant to development occurring anywhere on the project site, the floor area ratios or "FAR's" for the Upper Campus and for the Lower Campus, as respectively set forth in the Land Use Element, necessarily would be exceeded. Consequently, the 2002 "amendment" clearly violates the Newport Beach General Plan.

This conduct indicates a complete disregard of the terms of the governing document and relevant law, which continuing disregard is manifest by and in the Notice, utilizing this phantom definition and passage of what appears an illegal amendment, to justify that a portion of the requested floor area increase, to wit, the 24,215 square feet associated with the cogeneration facility, "... could be approved because [it] does not materially increase vehicle trip generation." Such was the justification for the "amendment."

While it is believed no additional development beyond that permitted by the express terms of the Development Agreement may even be legally requested or allowed, assuming for purposes of argument that such might be granted, the following observations are made.

The only claimed purpose or alleged need for the project is found within the "Environmental Checklist" at page 10 of the Notice, in a more detailed "Description of the Project." The Notice states, "[t]o allow future flexibility in building placement ... " This need for "flexibility," however, was well considered in connection with the original (and believed conclusive) approval and was the very reason Hoag was allowed to proceed by way of a Development Agreement and the use of building envelopes.

The Development Agreement recites, at page 1, Section 1.1, subsection (a), as its express "Purpose," to:

Enable Hoag to adapt to the ever changing health care needs of those residents within its service area by authorizing construction of new or additional facilities in a manner that will allow Hoag to respond to rapid changes in medical and health care technology and delivery systems.

The Notice itself, at page 5, accurately conveys the developmental freedom afforded Hoag by the PC Text, observing, "[t]he PC Text does not specify building locations or specific building uses, however, permitted uses for each of the two main campuses are listed in the PC Text." The lists of uses in the PC Text are lengthy, containing only vague, broad categories of building purpose. To return now and claim the need for "flexibility" strains credibility.

This passage at page 10 continues, "... while limiting the intensity of building on the Lower Campus, the proposed amendment to the General Plan Land Use Element would establish a maximum allowable building area on the Upper Campus of 990,349 sq.ft. and a maximum allowable amendment on the Lower Campus of 583,481 sq.ft. In no event could the building areas of both the Upper and Lower Campuses exceed 1,373,045 sq.ft."³ Beyond the baselessly alleged need for the project discussed above, this passage is fraught with misdirection.

There are numerous references throughout the "Narrative Discussion of the Checklist Evaluation" to the reallocation of development from the Lower to the Upper Campus.⁴ The fact is, under the existing Development Agreement and General Plan, Hoag is allowed 577,889 square feet of development on the Lower Campus with an FAR of 0.65 and 0.90 for structures including above-grade covered parking. Assuming the vacation of the easement by the City of Newport Beach, Hoag would be entitled to an additional 5,592 square feet of development for a total of 583,481 square feet. This is the amount sought by the project, calculated at the existing FAR. There is no less development than is currently allowed on the Lower Campus. There is no "reallocation."

In that it appears not to be reflected in the requested increase for the Lower Campus, arguably what is "reallocated" to the Upper Campus is the 24,215 square feet attributable to the cogeneration plant. The total additional square footage sought for

³The square footage sought for the Lower Campus is the 583,481 number and not 538,481 as sometimes appears throughout the text of the Notice of Preparation.

⁴In his presentation in March, 2005, to Villa Balboa homeowners, Peter Faulk, Executive Vice President of Hoag, employed a similar statement, indicating that development would be "shifted" from the Lower to the Upper Campus.

the Upper Campus is not increased by this amount, but by the unexplained, arbitrary, momentous sum of 225,000 square feet.⁵ The Notice states, "[i]n no event could the building areas of both the Upper and Lower Campuses exceed 1,373,045 sq.ft.," however, the sum of the square footage Hoag seeks for the site--990,349 Upper/583,481 Lower--totals 1,573,830 square feet. No where is this total set forth in the Notice. How accurate, thorough and unbiased can the analysis be which accompanies such a deceptive Notice and concludes only an SEIR is warranted?

Finally as regards the materials preliminary to the actual environmental analysis, it is noted that the Notice at page 1, in connection with a discussion of "Project Location," and again in connection with the "Environmental Checklist" and the topic "Surrounding Land Uses and Setting," at page 8, the document indicates that the Hoag, " ... site is generally bounded by ... residential development and Superior Avenue to the west."

This description is misleading. In fact, the vast portion of Hoag's western border--along which runs its service road--is contiguous to high six-figure residences. The Hoag site never reaches Superior Avenue, as is apparent from Exhibit 1 to the PC Text. The description in the Notice only seeks to mischaracterize the surrounding uses and marginalize the homes of those adjacent to the property. Alternatively, if such erroneous description was innocent error, one must question the reliability of the attendant analysis--dealing as it does with speculative uses and impacts--by one who cannot even accurately identify the land to be analyzed.

Initially, one part of the mitigation associated with the Hoag development and relevant to each aspect thereof, was the requirement of an annual review. This was provided by the Development Agreement, at Section 5.2 Public Hearing. As is implied, these annual reviews were/are to be conducted at a publicly noticed hearing, pursuant to Chapter 15.45 of the Municipal Code. It should be noted that this resident, well within 300 feet of the project, never has received the requisite notice by mail of any of these required reviews.

The comments which follow are made concerning the "Narrative Discussion of the Checklist Evaluation" which is referred to hereinafter as the "Narrative" or the "Initial Study."

⁵Currently, Hoag is allowed 765,349 square feet of development on the Upper Campus with an FAR of 1.0. Based upon rough estimates of present Upper Campus development, it is believed Hoag has exceeded or is close to exceeding the allowable FAR for the Upper Campus.

III. Air Quality

The inquiry here is, "[w]ould the amendment to the Hoag Hospital Master Plan Project ... [c]reate objectionable odors affecting a substantial number of people?" In response, the Initial Study indicates the project would have a "Less Than Significant Impact." The Narrative then states that, "Hoag Hospital uses do not generate significant odors." This is not true, as the inquiry is not confined to hospital uses, but to anything the developer is doing or may do on the property in connection with its primary use.

Unknown to many and as is discussed below in connection with "Utilities and Service Systems," the dining room/cafeteria functions discharge into an underground tank which must be pumped regularly. This process has gotten increasingly involved over the years as Hoag's operation has placed more and more pressure on this system. The operation can involve as many as two large pumping trucks and can generate extreme levels of noise for hours, all the while emitting objectional and putrid odors to those anywhere down wind. In that the erroneous conclusion as to property uses was thought dispositive of the issue, it should and must be addressed as a most adverse, regular impact.

IX. Land Use and Planning

The inquiry here is, "[w]ould the amendment to the Hoag Hospital Master Plan Project ... [c]onflict with any applicable land use plan, policy, or regulation of any agency with jurisdiction over the project?" In response, the Initial Study indicates the project would have a "Potentially Significant Impact."

This is the height of understatement given that by its very being, the "amendment" cannot legally be sought by virtue of, and so at a minimum, "conflicts with" the Development Agreement, the Newport Beach General Plan, and Government Code Section 65864, et seq.

The Narrative states that the SEIR will analyze, among other things, "... consistency with applicable planning and public policy documents." As discussed above, the very proposal of the project is inconsistent with the express terms and statements of public policy set forth in controlling documents and expressly prohibited thereby.

As has been noted before, Hoag and the City have not met certain of their respective obligations under the controlling documents and applicable law. Each has a history with regard to the development under the plan which Hoag now seeks to modify. These past occurrences, instances of disregard, and history of abuses should and cannot be ignored in any honest analysis of the project. Favorable annual reviews of the development cannot be used as an argument in support of the inconsequence of the past and current abuses in that, as discussed above, the annual review safeguard has not been utilized as contemplated by the then-City Council--which endured the

hours of testimony in opposition--or as required by law.

The unjustified grab for 225,000 additional square feet on the upper Campus is symptomatic of development violative of an "applicable land use plan." Of the three height zones set for the Upper Campus by the PC Text, two have currently been exceeded. These include the Tower Zone, limited by the roof of the tower then existing. In exceeding this limit, Hoag has placed, as to the existing tower roof, a flag pole, an extensive antennae installation, a screening to hide the additional equipment placed above the limit and, as to the Women's Pavilion roof, large, rectangular, metal-sheathed installations. In the Parking Zone, nothing was to exceed the height limit with the exception of the lot's elevator tower. Here, Hoag has placed temporary buildings which, while a permitted use, count toward the buildable area and height limitations. Any prospective plan must have meaningful enforcement provisions in place.

The Narrative states that, "[t]he existing General Plan will be used as the basis for the analysis." As has been shown, the General Plan has already been violated by requesting and approving by Hoag and the City, respectively, the so called "first amendment" in 2002, which ran afoul of the respective FAR's for the Campuses set by its Land Use Element. How can the General Plan serve as a basis for meaningful analysis when its provisions have already been ignored?

The Narrative notes that, "[f]inal EIR No. 142 determined that the project would result in significant, unavoidable impacts on residential units ... The proposed amendment to the Master Plan would not alter or make these impacts more severe. Therefore, while these issues will be addressed in the EIR [sic], they would not constitute a new impact."

This is the type of limited, "abandon all hope" attitude which indicates the lack of vision and will to do what good planning requires. Generally, where development is deemed to have a significant and unavoidable impact, it is not allowed. Hoag has 38 acres on which to build, and it yet is allowed to concentrate its development where it makes the least sense and causes the most damage. The analysis here acknowledges that it was bad planning before, but the illogical opinion that increased development will not make the impact more severe is simply irresponsible.

When the analysis relative to the Upper Campus was originally made, the emergency room addition had not been completed. Passed with a Negative Declaration and the false representation by Hoag that usage would not be increased, it escaped any analysis of its impact on the environment. When within days of its approval by the City, a neighboring ER made public its decision to close, it was clear use would be increased at the Hoag ER. This addition, largely of glass, increased the concrete canyon effect already well in existence. Then, the Heart Institute was built, replacing

a grassy area.⁶ Any further development on the Upper Campus, while providing additional sources of noise, "hardens" the landscape, amplifies the sounds, and prohibits noise from escaping. Beyond this, Hoag efforts at minimizing noise or purchasing non-offensive equipment have proved to be of non-effect. In fact, noise levels on the service road have significantly increased over the past two and one-half years with City efforts to abate the problem a dismal failure.

Consistent with this, Hoag cannot maintain what it has developed. Planting on the berm along PCH at the gateway to the City, is terrible, being ugly, overgrown, and full of trash. The fact that it borders construction is no excuse. The berm exists independently of use above it. Roofs tops on the site too, are unsightly, strewn with trash and broken, smoke/steam-belching equipment. Publicly, Hoag representatives have stated it has no obligation to maintain or clean up its developed areas. It only wants to develop more. And when Hoag does build, it does so without any concern as to the efficiency of its installations or the adverse impact thereof on the community.

The protection afforded by controlling documents such as the Development Agreement, did not exist at the time impacts were assessed by the EIR. There is now a history of the development too, and a pattern of developer conduct which can be analyzed. The quality of development and of site maintenance can be assessed. None of this was taken into account by the Initial Study. In light of the changed circumstances into which the project is now introduced, there is undeniably new impact associated with this plan, and it is significant.

XI. Noise

The inquiry here, among others, is, "[w]ould the amendment to the Hoag Hospital Master Plan Project result in ... [e]xposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance ...?" In response to this and the other listed inquiries, the Initial Study indicates the project would have a "Potentially Significant Impact."

This response clearly draws from the EIR, which in analyzing noise, found an insignificant impact. What is not apparent from the Narrative discussion is that when Final EIR No. 142 was completed, there were no noise ordinances for the City of Newport Beach.

⁶Throughout the Narrative, there are references to the fact that the Critical Care Surgery Addition was not built, and that mitigation measures or its impact can be ignored. Be advised that in its place, Hoag did construct the Heart Institute, which generates heat, noise, trips, etc., and, in short, adverse impacts on the surrounding environment which cannot and should not be discounted.

In order to provide some context for the data generated, the noise studies which were done at the time utilized the county standard as a benchmark. These studies found, for example, that noise levels on the service road to the west of Hoag consistently exceeded the allowable County standard and spiked by the passage of delivery trucks regularly using the road. Since there were no limits in the City, however, the ability of Hoag to generate noise at what were even unacceptable County-levels was unrestricted.

Now, the City has applicable noise ordinances which mandate that noise to adjoining residences be no more than 50 DBA at night and no more than 55 DBA in the day. Accordingly, the mitigation measure Item 39. in the Narrative, is irrelevant, its requirements having been ignored by Hoag anyway. Hoag's development does not meet the requirements of this law now. It is unlikely wholly new development will meet these requirements. It is certain that with increased development, Hoag will not.

Further, City ordinances now consider as a public nuisance, any excessive noise occurring for more than a period of 15 minutes. This regularly occurs on the Hoag site by virtue of idling big rigs, the use of the sterilizer and the box-crusher.⁷ All of these activities violate the ordinances due to their attendant noise. Accordingly, in light of these ordinances and the now-irrelevant analysis in the EIR, these impacts are new, significant, and require a full evaluation, together with the creation of a system for enforcement of standards. Please see the discussion of noise, as well, in connection with "Air Quality" and with "Land Use and Planning" above.

As a final point relevant to the discussion of noise, it is expressly noted that the "District Regulations" in the PC Text, specifically Item L. Loading Dock, require that consideration be given to the problem presented by the loading dock. Despite the presence of the Heart Institute built in the place anticipated for the Critical Care Surgery Addition, noise has not been attenuated, rather increased. As regards the dock itself, its over use, inadequate size, poor design, and worse location necessitates excessive idling and jockeying of trucks (each equipped with back-up alarms). Clearly, this provision and protection has been ignored by Hoag, the City and the Initial Study.

While the subject impact is perhaps not new, it was substantial enough to warrant a specific District Regulation, yet was never mitigated. It should and must be, particularly in that increased development means a larger plant with greater supply and

⁷Item 119. in the Narrative deals with non-vehicular activities in the loading dock area, and indicates hours of operation were to be limited as a way of mitigating their effect. Again, relevant ordinances were not in place at the time and this mitigation would likely be seen as too little today. Beyond this, even this accommodation is regularly ignored and violated by Hoag which runs such equipment as the sterilizer and box-crusher at all hours.

delivery needs. The site is already too large to be adequately serviced by the access roads and dock existing on the property. It is strongly urged that main delivery facilities be located off-site and supplies brought in by smaller, lighter vehicles better suited for the maneuverability required by the site configuration as developed by Hoag.

XVI. Utilities and Service Systems

The inquiry here is, "[w]ould the amendment to the Hoag Hospital Master Plan Project ... [e]xceed wastewater treatment requirements[,] ... [r]equire or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, ... [r]esult in a determination by the wastewater treatment provider which services or may serve the project that has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments[,] ... [b]e served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs ... [or] [c]omply with federal, state, and local statutes and regulations related to solid waste?" In response to all of these inquiries, the Initial Study indicates the project would have a "Less Than Significant Impact." The Narrative discusses only sewer lines and landfills. A complete ignorance of the fact that all of Hoag is not on a sewer system and that all of the solid waste generated by Hoag is of the type to go into a landfill.

As noted above in connection with the discussion of "Air Quality," the dining room/cafeteria functions discharge into an underground tank which must be pumped regularly. Over the years, this process has become more involved as Hoag's operation has increased. Initially taking less than an hour and one small truck, the operation now can require two large trucks and many hours. The fact of this increase alone as to this one limited system disproves the statement in the Narrative that, "[t]he project would not substantially alter the amount for solid waste being generated by the project." A larger project will result in more waste, as well as increased water needs. This is undeniable.

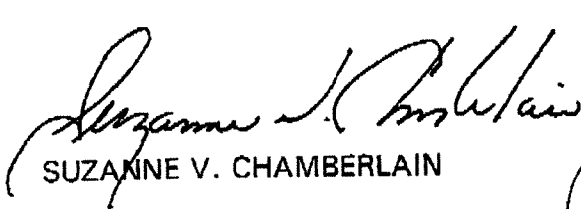
Beyond this, were the drafters of the EIR aware of this fact, perhaps the need to expand the existing 15-inch sewer trunk main would have been seen as a necessity and not merely a potential need. Were this analyzed then, the appropriateness and true feasibility of such an arrangement would have been reviewed. In that the pumping site is located on the service road bordering the west of Hoag's site, the pumping can only be done on weekends when traffic is light.

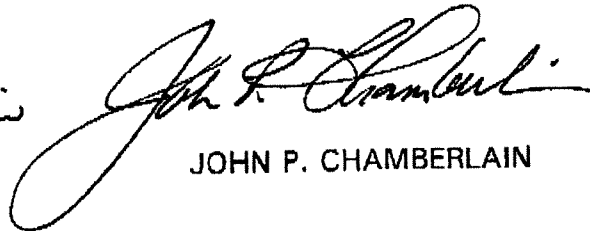
While yet another example of the site being over-worked and over-developed, it illustrates that this form of waste management is inappropriate given the confines of the site and the location which this function must occur. More importantly, were this treatment of waste known to those making a "Utilities and Service Systems" analysis of the site and development thereon, would service connections or landfill capacity have been found sufficient to service Hoag's operation or would serious mitigation or

sewer assessments be in order? It is urged therefore, that this issue be revisited in light of the use by Hoag of this method of waste management, incompatible with surrounding uses as well as those of Hoag itself, which method promises to become larger in scale and increasing offensive, particularly if greater development is permitted.

As initially discussed, the project is prohibited by the Development Agreement, attendant documents and relevant law. In the event Hoag and the City proceed, for the foregoing reasons and in light of the fact that the project seeks to amend the Newport Beach General Plan, it is urged that the project be given full review and a new EIR required.

Very truly yours,


SUZANNE V. CHAMBERLAIN


JOHN P. CHAMBERLAIN

cc: Robin Clauson, Esq. (by U.S. Mail)

May 17, 2005

Mr. David Lepo
Hogle-Ireland, Inc.
42 Corporate Park Dr.
Irvine, Ca 92606

Re: Hoag Hospital proposed amendment to Development Agreement with City of Newport Beach, amendment of General Plan, and amendment to the Planned Community (PC) text.

Dear Mr. Lepo,

I am an owner at Villa Balboa , adjacent to Hoag Hospital , as well as a board member of the Villa Balboa Community Association. I would like to present the following observations and questions regarding this proposed project, for city planning staff's review and response.

1. What are the reasons for this request? I have not found an explanation for Hoag's request , other than they want the newly constructed Co-generation plant to not be counted towards building square footage on the site. That proposal seems strange since the building obviously takes up horizontal and vertical space on the project site. It contributes to both building coverage and floor area ratio (FAR) on the site.

On page 2 , it is stated that " An increase in the maximum allowable square footage for the Hoag Hospital site could be approved because the co-generation facility does not increase vehicle trip generation" Let me ask, Is traffic the only criteria that rules the world...what about the potential adverse visual effects from increased density?

2. As I see it, this request is nothing more than a thinly veiled attempt by Hoag to increase the FAR on the upper campus by 30% over existing entitlement, from 1.0 FAR to 1.3 FAR. They have revealed this intent by stating that the maximum building square footage on the upper campus would go from 765,340 sq.ft.t. to 990,349sq.ft., an increase of 225,000 sq.ft. This is tantamount to adding another Women's Pavilion building to the upper campus, in addition to the existing entitlement.

3. What is the reason for abandoning the floor area ratio (FAR) caps in favor of maximum building square footage over the entire site? My guess is that Hoag realized that they would run out of building entitlement on the upper campus, so why not transfer entitlement from the lower campus? Under the existing agreement, if they don't build out the lower campus to the full entitlement, that unbuilt entitlement is "lost".

If Hoag built out 990,349 sq.ft. on the upper campus, that would leave only 382,696 sq.ft. remaining on the lower campus. Conceivably Hoag could build the 382,696 sq.ft. of building on only portions of the lower campus, leaving extra vacant land for possible future developments via amendments to the agreement (such as this request). Removing the FAR requirement on the lower campus is a future benefit to Hoag; they could consolidate that remaining building sq. footage into a denser configuration than a .65 FAR would permit. For instance, 382,696 building sq.ft. at .65 FAR = 13.5 acres. By increasing FAR to 1.0 (no restrictions to FAR), Hoag could accomplish the same amount of building sq. footage on 8.8 acres, a savings of 4.7 acres. This strategy could result in a vacant lower campus parcel (with no entitlement), for which Hoag could come back to the City and request additional entitlement or even another use, such as assisted living, senior center, or other use not likely to encounter much opposition.

4. Are parking structures counted towards building square footage under the current PC text? Perhaps Hoag plans to construct some massive parking structures on the lower campus. The parking structures could even serve the upper campus. If parking structures are not counted towards building square footage, but are counted towards FAR, then there are serious problems with the proposed removal of maximum FAR 's for both upper and lower campuses.

5. The proposed amendment states that the City may abandon an easement so Hoag can gain another 5592 sq.ft. of building entitlement. My question is, where is the easement, and what is its configuration? If the easement exists in an existing building setback zone along one of the project site's edges (ie. Street setback), I would propose that it not be counted towards additional site area for future Hoag development. It can't be built upon anyway!

6. In summary, I believe that the existing development agreement should not be modified at this time.

Sincerely,

Philip H. Bias
5 La Serena
Irvine, CA 92612



CITY OF COSTA MESA

P.O. BOX 1200 • 77 FAIR DRIVE • CALIFORNIA 92628-1200

DEVELOPMENT SERVICES DEPARTMENT

May 18, 2005

Mr. David Lepo
Contract Project Manager
Hogle-Ireland, Inc.
42 Corporate Park, Suite 250
Irvine, CA 92606

**SUBJECT: NOTICE OF PREPARATION FOR SUPPLEMENTAL ENVIRONMENTAL
IMPACT REPORT FOR THE HOAG HOSPITAL MASTER PLAN
AMENDMENT**

Dear Mr. Lepo:

The City of Costa Mesa has reviewed the Notice of Preparation for Supplemental Environmental Impact Report for the Hoag Hospital Master Plan Amendment. The proposed project consists of amendments to the Development Agreement between the City of Newport Beach and Hoag Memorial Hospital Presbyterian General Plan, and "Hoag Memorial Hospital Presbyterian Planned Community Development Criteria and District Regulations." Following are the City's comments on the proposed amendments.

TRANSPORTATION/CIRCULATION

- 1) The City would appreciate an analysis of the following intersections. The traffic study would identify any significant impacts to these intersections resulting from the project implementation.
 - Newport Boulevard – 19th Street
 - Newport Boulevard – Broadway
 - Newport Boulevard – Harbor Boulevard
 - Newport Boulevard – 18th Street/Rochester Avenue
 - Newport Boulevard – 17th Street
 - Newport Boulevard – 16th Street
 - Newport Boulevard – Industrial Way
 - Superior Avenue – 16th Street
 - Superior Avenue – 17th Street

The City recommends that these intersections be included in the General Plan study relating to shifting uses from the lower campus to upper campus.

May 18, 2005
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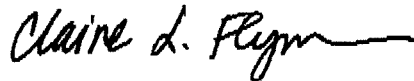
2) For Year 2025, the City encourages that the General Plan analysis be conducted under the following assumptions:

- (a) SR-55 Freeway is not extended south of 19th Street
- (b) 19th Street bridge over the Santa Ana River is not constructed

The City recommends that all mitigation measures be conditioned based on these assumptions.

Thank you for the opportunity to comment on this project. The City of Costa Mesa is very interested in the Hoag Hospital expansion. We hope to continue to have close communication on this project and an opportunity to fully understand any significant impacts to the transportation system. If you have any questions or need additional information, please contact me at (714) 754-5278.

Sincerely,



CLAIRE L. FLYNN, AICP
Senior Planner

- cc: Donald D. Lamm, Deputy City Mgr., Dev. Svs. Director
 R. Michael Robinson, Asst. Dev. Svs. Director
 Kimberly Brandt, Principal Planner
 Peter Naghavi, Transportation Mgr.
 Raja Sethuraman, Assoc. Engineer