

Appendix A
Notice of Preparation and Comments Received



Notice of Preparation and Scoping Meeting University of California, Irvine Irvine Campus Medical Complex Environmental Impact Report

DATE: February 27, 2020

TO: Reviewing Agencies and Other Interested Parties

FROM: University of California

PROJECT TITLE/SUBJECT: University of California, Irvine (UCI) Irvine Campus Medical Complex – Notice of Preparation of an Environmental Impact Report (EIR) and Public Scoping Meeting

NOTICE OF PREPARATION REVIEW PERIOD: February 28, 2020 to March 28, 2020

SCOPING MEETING: Monday, March 9, 2020 at 6:00 PM
UCI Newkirk Alumni Center
450 Alumni Court, Irvine, CA 92697

Pursuant to Public Resources Code Section 21165 and the California Environmental Quality Act Guidelines (CEQA) Guidelines Section 15050, the University of California Board of Regents (UC Regents) is the Lead Agency responsible for preparation of an Environmental Impact Report (EIR) addressing potential impacts associated with the proposed Irvine Campus Medical Complex Project (ICMC).

REQUEST FOR COMMENTS ON THE SCOPE OF THE EIR

The purpose of this Notice of Preparation (NOP) is to solicit comments and suggestions regarding the scope and content of the EIR and the environmental issues and alternatives to be addressed in the EIR (CEQA Guidelines §15082). This NOP also provides notice for the public scoping meeting. The UC Regents, as Lead Agency, respectfully requests that any responsible or trustee agency responding to this notice reply in a manner consistent with State CEQA Guidelines Section 15082(b). Comments and suggestions should identify the significant environmental issues, reasonable alternatives, and mitigation measures that should be explored in the EIR, in addition to whether the responding agency will be a responsible or trustee agency for the proposed project.

The attached summary of the proposed project's probable environmental effects and alternatives is not an analysis of the project or its impacts. The project summary information is intended to provide said agencies, interested parties, and organizations with sufficient information describing the proposed project and the environmental issues that will be addressed in the EIR so that meaningful responses and comments can be provided.

PROJECT LOCATION

The project site is located in the North Campus sector of the UCI Campus. The site is generally bordered by Birch Street to the northeast and Jamboree Road to the northwest. The project site is located approximately 0.8 mile northwest of the UCI Main Campus. The site is approximately 14.5 acres and is primarily undeveloped, but includes portions of existing UCI support service facilities with adjacent surface parking.

PROJECT DESCRIPTION

The project would allow for the development of a UCI Health integrated medical campus providing inpatient, ambulatory, and emergency care services. Proposed buildings include an approximately 350,000-gross-square-foot (gsf) hospital, approximately 200,000 gsf ambulatory care center, approximately 25,000 gsf central utility plant, and a parking structure with approximately 1,400 spaces. All buildings are proposed to be five to seven stories with additional basement levels proposed within the hospital and ambulatory care center. Proposed open space improvements include outdoor public spaces and gardens, pedestrian trail improvements, and landscaping.

Primary vehicular access would occur from two locations on Jamboree Road. Additional parking would be provided in surface parking areas distributed throughout the project site. The project would improve

circulation through the construction of pedestrian walkways and trails and shared vehicle/bicycle access roads. On-site bicycle parking would be provided in key locations.

The UCI 2007 Long Range Development Plan (LRDP) provides the comprehensive framework for development on the UCI campus; no other local land use plans apply to the project site. The project site has a LRDP land use designation of Mixed Use – Commercial. The LRDP Mixed Use – Commercial land use designation currently does not include inpatient clinical uses. Along with the analysis of the project’s environmental effects, the EIR will also analyze the proposed LRDP Amendment #3, which would add inpatient uses as an allowable use under Mixed Use – Commercial.

RESPONDING TO THIS NOTICE

The UC Regents request your review and consideration of this notice, and invites input and comments from responsible and trustee agencies and interested persons and organizations regarding the preparation of the EIR. Pursuant to CEQA Section 21080.4, agencies must submit any comments in response to this notice no later than 30 days after receipt of this notice. Comments will be accepted through the close of business on March 28, 2020. E-mail responses to this notice may be sent to hashimol@uci.edu.

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

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

The NOP is also available at UCI at the address and department noted above, and can also be accessed online at: <https://cpep.uci.edu/environmental/review.php>. Additionally, copies of the document are also available for review at the following libraries:

University of California, Irvine
Langson Library, Main Campus
Irvine, CA 92697

University Park Library
4512 Sandburg Way
Irvine, CA 92612

All parties that have submitted their names and mailing addresses will be notified of the availability of the Draft EIR. If you wish to be placed on the mailing list, have any questions, or need additional information, please contact Lindsey Hashimoto.

SCOPING MEETING

The University will hold a Public Scoping Meeting to present project information and solicit written comments on the scope of the EIR at 6:00 PM on March 9, 2019, at the UCI Newkirk Alumni Center, 450 Alumni Court, Irvine. Parking is available in Lot 14 located in front of the UCI Newkirk Alumni Center. Questions regarding the Scoping Meeting should be directed to Lindsey Hashimoto.

ATTACHMENT A
UC IRVINE, IRVINE CAMPUS MEDICAL COMPLEX
PROJECT SUMMARY

The Irvine Campus Medical Complex Project (proposed project) would allow for the development of a UCI Health integrated medical campus providing inpatient, ambulatory, and emergency care services. UCI Health is UCI's academic healthcare and research enterprise, serving a population of more than 3.3 million in greater Orange County. UCI Health is the only university-based care provider in Orange County and is currently primarily located on the two campuses, with the academic programs of the Susan & Henry Samueli College of Health Sciences on the main campus in Irvine, and the UC Irvine Medical Center (UCIMC) located in the City of Orange.

The overarching vision for the proposed project is development of a healthcare complex that positions UCI Health for the future; a facility with a specialty focus on oncology, neurosurgery, orthopedics, and spine services that serves the needs of the community in a modern, efficient, and accessible manner while building upon UCI's strong clinical foundation and reputation in these key specialty areas. The proposed project would create an environment where teaching, research, and clinical excellence interact to deliver the highest level of care and medical innovation, integrating the patient experience with advances in clinical quality. The proximity to the main UCI campus would promote a first-class teaching environment and establish a strong foundation for the development of research centers of excellence.

Existing Setting

The project site is located on the University of California Irvine (UCI) Campus in the City of Irvine, Orange County, California. The UCI 2007 Long Range Development Plan (LRDP) provides the comprehensive framework for development on the UCI campus; no other local land use plans apply to the project site. The 1,475-acre UCI campus is delineated into five planning sectors in the 2007 Long Range Development Plan (LRDP): the Academic Core, East Campus, West Campus, North Campus, and South Campus. These planning sectors are connected through physical linkages, such as pedestrian walkways, bicycle and trail systems, transit routes, and roadways.

The project site is located within the North Campus sector of UCI and has a LRDP land use designation of Mixed Use – Commercial. It is approximately 0.8 mile from the Main Campus and is physically separated from the Main Campus by University Drive, San Diego Creek, and the UC San Joaquin Marsh Reserve. The North Campus is generally bordered by Jamboree Road on the northwest, Campus Drive on the northeast, the UC San Joaquin Marsh Reserve to the south, and MacArthur Blvd to the southwest.

The approximately 14.5-acre project site comprises a portion of the North Campus. The project site is generally bordered by Birch Street on the northeast and Jamboree Road on the northwest. The project site is predominately undeveloped property but also includes existing UCI support service facilities.

Surrounding Land Uses

Existing University land uses adjacent to the project site include the UCI Child Development Center at 19262 Jamboree Road, Irvine to the northwest; existing UCI North Campus facilities to the northeast; the UC San Joaquin Marsh Reserve to the south; and undeveloped University property to the west. Existing North Campus facilities include campus support services (Facilities Management, Mail Services, Fleet Services, and Distribution), academic facilities (Air Pollution Laboratory, Hydrogen Fuel Cell Research Facility, and Faculty Research Facility), the UCI Arboretum, and surface parking. The UCI Child Development Center ceased operations in June 2019; the proposed UCI Center for Child Health/Medical Office Building project, which is not a part of the proposed project, would redevelop the existing Child Development Center site as a clinical facility focusing on pediatric and adult healthcare. The UCI

Arboretum includes a one-story, multi-purpose building; greenhouse; shade houses; and two aviaries. The landscaping consists of a mix of exotic and native plant collections, lawns, and an asphalt pathway system.

Off-campus uses in the project vicinity include residential, commercial, and municipal uses west, northwest, and northeast of the project site in the cities of Irvine and Newport Beach.

Land Use Designation

The UCI land use designation for the project site is Mixed Use – Commercial. The Mixed Use – Commercial land use designation allows for the construction of facilities for Clinical Uses, General Office, Research & Development, Academic Uses, Commercial and Retail, Conference Facilities, and Residential uses.

Project implementation would require an UCI LRDP land use amendment to include Inpatient Clinical uses within the LRDP Mixed Use – Commercial land use designation.

Description of Proposed Project

The UCI 2007 LRDP allows for 950,000 gross square feet (gsf) of development and 435 residential units in the overall 144-acre North Campus Sector. The proposed project would allow for the following uses in the North Campus. All buildings would be five-to-seven stories. Additional basements levels are proposed within the Specialty Hospital and Ambulatory Care Center.

- Specialty Hospital – An approximately 350,000 gsf hospital with an emergency department, inpatient bed services, operating rooms, pre- and post-observation beds, inpatient imaging, and support services. The hospital is proposed to include approximately 96 to 144 inpatient beds.
- Ambulatory Care Center – An approximately 200,000 gsf facility with outpatient surgery and procedure rooms, diagnostic and imaging services, oncology treatment and infusion, clinical examination rooms, pharmacy, and support services.
- Central Utility Plant – The approximately 25,000 gsf utility plant would provide chilling and heating energy services to the proposed project.
- Parking Structures – Approximately 1,400 spaces in structures serving patients, visitors, and staff.

Within the development footprint, project implementation would require the demolition of up to eight low-rise buildings, multiple cargo containers, storage sheds, and existing site infrastructure, including roadways, underground utilities, and landscaping. Demolition and construction activities are expected to occur over approximately 54 months.

Parking, Circulation, and Access

Primary access to the project site would be provided from two vehicular access points on Jamboree Road: (1) the existing signalized intersection of Jamboree Road at Birch Street; and (2) a right-in/right-out access on Jamboree Road approximately 725 feet south of Birch Street (West Access Road; to be constructed as a part of the UCI Center for Child Health/Medical Office Building Project). The existing right-in/right-out/left-in access on Campus Drive near Graduate Street would continue to serve the overall North Campus Sector. An emergency vehicle-only left-turn access, including median modifications, at the proposed West Access Road may be constructed.

Parking for patients, staff, and visitors would be provided in the approximately 1,400 space parking structure. Additional visitor parking, short-term parking, service parking, and drop-off areas would be provided in on-site surface parking areas. Access to the parking structure would be provided from all entrances to the project site.

The proposed project would include pedestrian circulation and access improvements. On-site pedestrian walkways and trails would serve all buildings and provide connections to off-site pedestrian systems. On-

site bicycle circulation and access would be provided on shared vehicle/bicycle access roads to provide connections to the off-site bicycle trail network. On-site bicycle parking would be provided.

Lighting and Landscaping

New exterior lighting would be installed on all buildings, and throughout parking facilities, roadways, pedestrian walkways, and landscaped areas. All site lighting would be designed to reduce impacts on wildlife within the UC San Joaquin Marsh Reserve. Site lighting design and fixtures would follow campus standards: all light sources would be light emitting diode (LED), shielded fixtures, and dark-sky rated (no light trespass). Landscape improvements would include outdoor public spaces and gardens for pedestrian circulation, gathering, and patient wellness; open space and pedestrian trail improvements; ornamental landscaping throughout the project site; and native landscaping adjacent to the UC San Joaquin Marsh.

Utilities

The proposed project would connect to existing utility and infrastructure systems. Due to the location, age, and capacity, the existing systems may require upgrading, replacement, or extensions to serve the proposed project. An Office of Statewide Health Planning and Development (OSHPD) compliant Central Utility Plant would be constructed to provide thermal energy service and other utility services to the proposed project. The Central Utility Plant would provide chilled water, high temperature water, back-up power generation, and services to the buildings.

Project Phasing and Site Development

Construction of the proposed project is anticipated to start in June 2021 and completed in April 2024. Rough grading is anticipated to be completed in the first three months of construction.

Temporary construction staging would occur at two proposed locations within the North Campus. The sites proposed include within existing campus support services to the north of the project site and within a previously graded area adjacent to existing Arboretum plantings to the east of the project site. An additional remote staging site may also be utilized in the UCI West Campus. All construction staging would be temporary and no sensitive vegetation would be removed.

Alternatives to the Proposed Project

CEQA Guidelines Section 15126.6(a) requires that, “an EIR describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” The anticipated range of alternatives to be addressed for the project would include alternatives that are specifically required (i.e., No Project; No Action/No Development) by CEQA. Additional land use alternatives to be addressed could include a reduced development and a design alternative.

Anticipated Discretionary Project Approvals

UC Regents discretionary actions that could be approved based on the certification of the Final EIR would include the following:

- Certification of the UCI Irvine Campus Medical Complex Final EIR
- Approval of UCI LRDP Amendment #3
- Approval of the UCI Irvine Campus Medical Complex Project

The proposed project would require permits and/or approvals from the following agencies:

- California Office of Statewide Health Planning and Development (OSHPD). OSHPD is responsible for overseeing all aspects of construction of general acute care hospital, psychiatric hospital, and multiple-story skilled nursing home, and intermediate care facilities in California.
- Santa Ana Regional Water Quality Control Board (RWQCB). Construction General Permit would be required for the project.
- South Coast Air Quality Management District (SCAQMD). A permit from SCAQMD would be required for the generators.

Permits from the City of Irvine and/or the City of Newport Beach would be required for any off-site improvements, such as roadway improvements, required to serve the project.

Probable Environmental Effects of the Proposed Project

The proposed project has the potential to have significant impacts on several environmental factors. Using the CEQA Environmental Checklist as a guide, at least one impact area has been identified as having a “Potential Significant Impact” in the following areas, and will be addressed in the EIR:

Aesthetics	Air Quality
Biological Resources	Cultural Resources
Energy	Geology and Soils
Greenhouse Gas Emissions	Hazards and Hazardous Materials
Hydrology and Water Quality	Land Use and Planning
Noise	Population and Housing
Public Services	Recreation
Transportation	Tribal Cultural Resources
Utility and Service Systems	

The topics identified on the Environmental Checklist that are not required for assessment in the EIR are Agricultural and Forestry Resources, Mineral Resources, and Wildfire. The project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No portion of the project site is under a Williamson Act Contract. The project site is not zoned for agriculture or forestry use, and it is not designated as forest land. The project site does not contain regionally or locally-important mineral resources, and there are no locally-important mineral resource recovery sites in the project site vicinity. The proposed project would have no impact to these resources. With respect to wildfire, as shown in mapping by CalFire, the campus is not located in a LRA Very High Fire Hazard Severity Zone (VHFHSZ); therefore, the topic of Wildfire is not applicable to this project.

Anticipated Schedule

The project schedule, as currently envisioned, anticipates a Draft EIR to be available for public review in summer 2020. A 45-day public review period would be provided, after which responses to environmental comments received would be prepared. Consideration of certification of the Final EIR and project approval by the UC Regents is anticipated in early 2021.

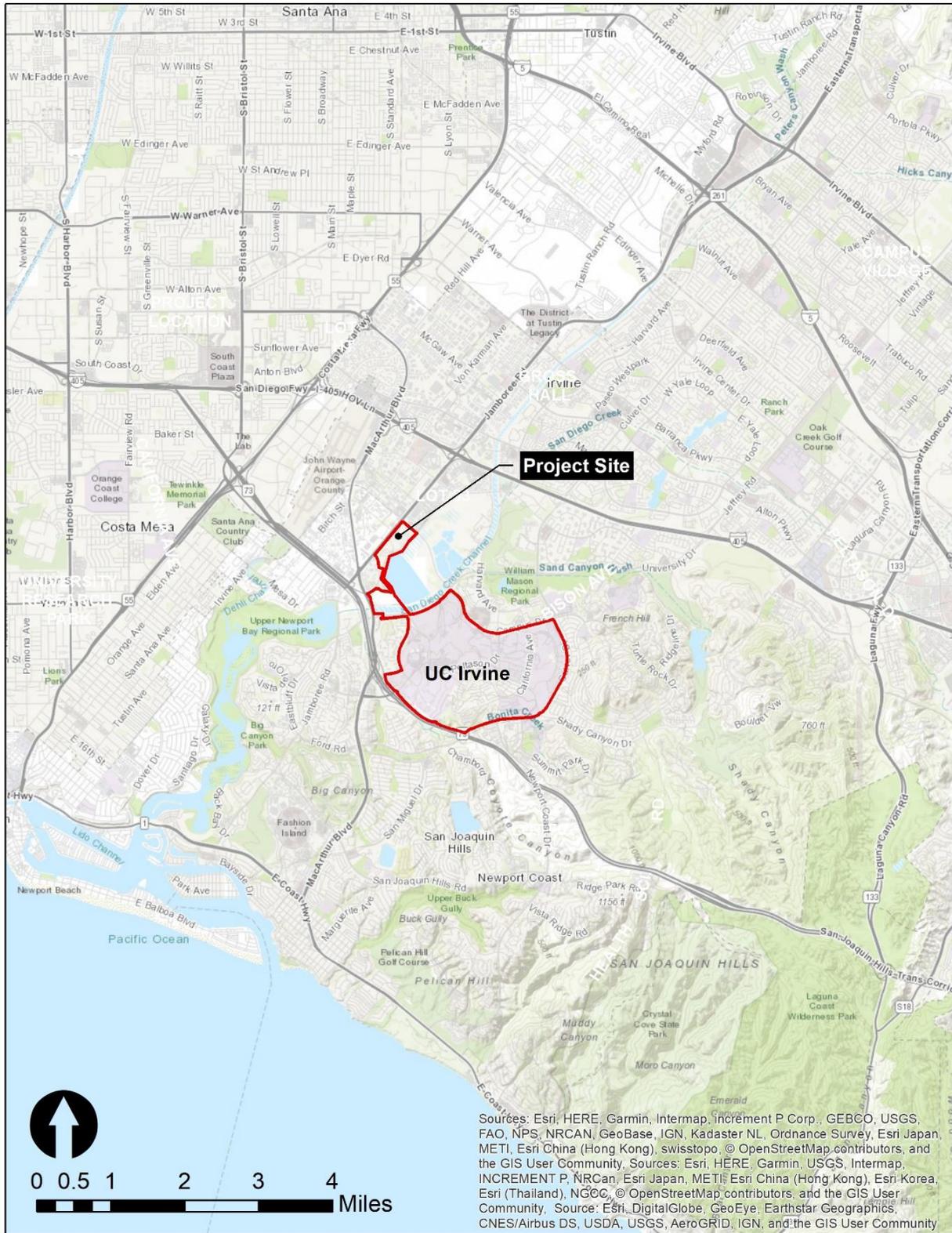


Figure 1
Regional Location



Figure 2
Conceptual Site Plan
For Illustrative Purposes Only



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Rd.
San Diego, CA 92123
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



March 30, 2020

Lindsey Hashimoto
University of California, Irvine
4199 Campus Drive, Suite 380
Irvine, CA 92697
hashimol@uci.edu

Dear Ms. Hashimoto:

**Subject: Irvine Campus Medical Complex (PROJECT)
NOTICE OF PREPARATION (NOP) OF AN ENVIRONMENTAL IMPACT
REPORT (EIR) SCH# 2020029099**

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) from the University of California, Irvine (UCI) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

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

CDFW ROLE

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

PROJECT DESCRIPTION SUMMARY

Proponent: University of California, Irvine (UCI)

Objective: The objective of the Project is to develop an integrated medical campus that provides inpatient, ambulatory, and emergency care services. Proposed buildings include a hospital, ambulatory care center, central utility plant, and parking structure. Primary Project activities include demolition of existing buildings, removal of cargo containers and storage sheds, undergrounding utilities, landscaping, and construction of the new facilities.

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

Location: The 14.5-acre Project site is located on the North Campus sector of the UCI Campus in the City of Irvine in Orange County. The site is bordered by Birch Street to the northeast, Jamboree Road to the northwest, and UC San Joaquin Marsh Reserve to the south. The site is primarily undeveloped but does host support service facilities. Special status species with the potential to occur in the region identified using the California Natural Diversity Database (CNDDDB) include: burrowing owl (*Athene cunicularia*; California Species of Special Concern (SSC)), western pond turtle (*Emys marmorata*; SSC), and light-footed Ridgway's rail (*Rallus obsoletus levipes*; federal Endangered Species Act (ESA) and California Endangered Species Act (CESA) listed endangered; California Fully Protected Species (FPS)). UCI's informational website on the San Joaquin Marsh Reserve indicates that the marsh is a Pacific Flyway stopover for 100 migratory bird species. In addition to light-footed Ridgway's rail, California least tern (*Sternula antillarum browni*; CESA and ESA Endangered; FPS) has also been observed in the San Joaquin Marsh Reserve.

Timeframe: Project construction is anticipated to take 54 months.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist UCI in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the potential for the Project to have a significant impact on biological resources, CDFW agrees that an Environmental Impact Report (EIR) is appropriate for the Project.

I. Open Space and Pedestrian Trail Improvement Impacts

COMMENT #1:

Issue: Proposed landscape improvements include outdoor public spaces and gardens, as well as open space and pedestrian trail improvements. Details on open space and trail design were not available for review.

Specific impact: The area proposed for open space and trail improvements overlays an existing open space area, as indicated on the conceptual site plan in Figure 2 of the NOP. Bisecting of open space areas can create edge effects and habitat fragmentation, which would impact biological resources as a result.

To minimize significant impacts: The EIR should detail the design elements for trail improvements and open space areas, focusing on minimizing impacts to biological resources. Bisecting of existing open space areas should be avoided to minimize edge effect and maximize the biological value for the resources.

II. Impacts to San Joaquin Marsh Reserve

COMMENT #2:

Issue: The Project site is adjacent to the San Joaquin Marsh Reserve, which hosts multiple wetland habitats and provides a stopover for migratory birds. In consideration of the Project's proximity to this biologically rich habitat, the following measures should be implemented to minimize significant impacts to biological resources.

CDFW recommendations to minimize significant impacts:

1. CDFW has responsibility for wetland and riparian habitats. It is the policy of CDFW to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion that would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be “no net loss” of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks that preserve the riparian and aquatic values and maintain their value to onsite and offsite wildlife populations. Mitigation measures to compensate for impacts to mature riparian corridors must be included in the DEIR and must compensate for the loss of function and value of a wildlife corridor.

a. The project area supports aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be included in the EIR. The delineation should be conducted pursuant to the U.S. Fish and Wildlife Service wetland definition adopted by CDFW.² Please note that some wetland and riparian habitats subject to CDFW’s authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

b. CDFW also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the project applicant (or “entity”) must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. CDFW’s issuance of a LSAA for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. CDFW as a Responsible Agency under CEQA may consider the local jurisdiction’s (lead agency) Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSAA.³

2. CDFW considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish & G. Code, §§ 2080, 2085). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from CDFW may include an

² Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

³ A notification package for a LSA may be obtained by accessing CDFW’s web site at <http://www.wildlife.ca.gov/Conservation/LSA>.

incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and G. Code §§ 2080.1, 2081, subds. (b), (c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the project's CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

3. To enable CDFW to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the EIR.

a. The document should contain a complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.

b. A range of feasible alternatives should be included to ensure that alternatives to the proposed project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

Biological Resources within the Project's Area of Potential Effect

4. The document should provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. This should include a complete floral and faunal species compendium of the entire project site, undertaken at the appropriate time of year. The EIR should include the following information:

a. CEQA Guidelines, section 15125(c), specifies that knowledge on the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.

b. A thorough, recent floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <https://www.wildlife.ca.gov/Conservation/Plants/Info>). CDFW recommends that floristic, alliance-based and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008⁴). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation condition.

c. A current inventory of the biological resources associated with each habitat type onsite and within the area of potential effect. CDFW's California Natural Diversity Data Base in Sacramento

⁴ Sawyer, J. O., T. Keeler-Wolf and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society Press, Sacramento.

should be contacted at <https://www.wildlife.ca.gov/Data/BIOS> to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.

d. An inventory of rare, threatened, endangered and other sensitive species onsite and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service.

Analyses of the Potential Project-Related Impacts on the Biological Resources

5. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the EIR.

a. A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.

b. Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the EIR.

c. The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.

d. A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

6. The EIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. CDFW considers these communities as threatened habitats having both regional and local significance.

7. The EIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, onsite habitat restoration or enhancement should be discussed in detail. If onsite mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
8. For proposed preservation and/or restoration, the EIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.
9. In order to avoid impacts to nesting birds, the EIR should require that clearing of vegetation, and when biologically warranted construction, occur outside of the peak avian breeding season which generally runs from February 1 through September 1 (as early as January 1 for some raptors). If project construction is necessary during the bird breeding season, a qualified biologist with experience in conducting bird breeding surveys should conduct weekly bird surveys for nesting birds, within three days prior to the work in the area, and ensure no nesting birds in the project area would be impacted by the project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer should be a minimum width of 300 feet (500 feet for raptors), be delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
10. CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.
11. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation onsite; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

ENVIRONMENTAL DATA

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

Lindsey Hashimoto
University of California, Irvine
March 30, 2020
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form can be found at the following link:

http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

FILING FEES

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

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of an EIR to assist UCI in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Jessie Lane, environmental scientist at (858) 636-3159 or Jessie.Lane@wildlife.ca.gov.

Sincerely,



David A. Mayer
Acting Environmental Program Manager
South Coast Region

ec: Office of Planning and Research, State Clearinghouse, Sacramento

REFERENCES

Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

Sawyer, J. O., T. Keeler-Wolf and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society Press, Sacramento.

University of California. Natural Reserve System: San Joaquin Marsh Reserve.
<https://ucnrs.org/reserves/san-joaquin-marsh-reserve/>



March 18, 2020

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

Subject: First Review of the Notice of Preparation for the UCI Irvine Campus Medical Complex EIR and LRDP Amendment 3 to add inpatient clinical uses

Dear Ms. Hashimoto:

City of Irvine staff reviewed the NOP for EIR scoping for Irvine Campus Medical Complex located in UCI's approximately 144-acre North Campus on an approximately 14.5-acre site near the southeast corner of Jamboree Road and Birch Street (adjacent to and directly east of the proposed Child Health/Medical Office Building project) in Planning Area 29. The project site is predominately undeveloped property but also includes existing UCI support service facilities. Additionally, this project is located adjacent to the approximately 168,000 square foot UCI Center for Child Health/Medical Office Building that is under review and will be sharing the same driveways. Project demolition and construction activities are anticipated to occur over approximately 54 months

For reference, the 2007 Long Range Development Plan (LRDP) is a comprehensive land use plan, based on projections through 2026, which guides campus growth.

The proposed project includes the following:

- Construct an approximately 350,000 gross square foot five- to seven-story specialty hospital building with additional basement levels
- Construct an approximately 200,000 gross square foot five- to seven-story ambulatory care center with additional basement levels
- Construct 25,000 gross square foot central utility plant
- Construct an approximately 1,400-space parking structure for patients, staff, and visitors
- Additional parking (visitor, short-term, service, and drop-off) would be provided in surface parking areas distributed throughout the project site
- Construct on-site pedestrian/bicycle circulation and access improvements as well as lighting improvements

Ms. Lindsey Hashimoto

March 18, 2020

Page 2 of 5

- Construct open space improvements such as outdoor public spaces/gardens, pedestrian trail improvements, and landscaping
- Demolish up to eight low-rise buildings, multiple cargo containers, storage sheds, and existing site infrastructure

Primary vehicular access would occur from two locations on Jamboree Road as follows: (1) the existing signalized intersection of Jamboree Road at Birch Street; and (2) a right-in/right-out access on Jamboree Road approximately 725 feet south of Birch Street (West Access Road to be constructed as a part of the UCI Center for Child Health/Medical Office Building project).

The EIR would also analyze proposed LRDP Amendment #3, which proposes to add inpatient uses (i.e., hospital) as an allowable use under the Mixed Use-Commercial land use category.

Based on the review of the Draft IS/MND, staff would like to provide the following comments:

1. City staff is concerned why the proposed Child Health/Medical Office project was not analyzed together with this proposed project. Why are these adjacent projects being piecemealed especially when the proposed projects share access points off of heavily traveled Jamboree Road?
2. Per the City's General Plan and Zoning Ordinance, the property is zoned as 6.1 Institutional in Planning Area 29. There is currently 761,000 SF of educational facilities development intensity allocated to this planning area. Based on discussions between UCI and City planning staff in late 2019, the square footage intensity for PA 29 in the City's General Plan and Zoning Ordinance will be revised as part of the ongoing comprehensive General Plan Update effort to 1,090,000 SF maximum, including 140,000 additive SF for the existing FDA Lab Building which is not a part of UCI, and 435 DU, consistent with the 2007 LRDP.
3. Note the City does not show any existing square footage in Planning Area 29 (PA 29) with the exception of the existing FDA building (140,000 additive SF). Therefore, provide square footage summary by address and land use for all existing, proposed to be demolished, and proposed new SF to City planning staff so we can update our records and confirm the existing and proposed project square footage is within the PA 29 intensity cap. This information should also be clearly summarized in the DEIR.
4. While there appears to be enough building square footage intensity available in PA 29, staff has concerns with the proposed land use. Medical offices is not listed as permitted or conditionally permitted land use in this zone. Would this land use be

considered a community facility or government facility? Note a hospital use requires a CUP in the 6.1 zone.

5. The project site is designated as Mixed Use-Commercial in the LRDP. Staff confirmed that Table 5-1, 2007 LRDP Land Use Matrix, specifies primary uses for "Mixed-use Commercial" as "Facilities for office, research, and development, and academic activities, commercial and retail space, conference facilities, residential facilities, clinical uses (uses may be non-University oriented if located in the Inclusion Areas)."

The DEIR should clearly analyze why adding hospital use/inpatient clinical uses to the Mixed Use-Commercial land use category within UCI's LRDP is in the best interest of the public health, safety, and welfare of the community. Additionally, the DEIR should analyze if there are adequate public utilities and services to serve the project.

6. The NOP states project demolition and construction activities are anticipated to occur over approximately 54 months. Furthermore, construction of the proposed project is anticipated to start in June 2021 and completed in April 2024 (i.e., 34 months). Please reconcile the time frame from start to completion for the various project phases.
7. Clarify the number of parking structures proposed and the associated number of levels.
8. Will the project be LEED certified?
9. Specify by the number of associated beds for the proposed 350,000 GSF hospital.
10. Figure 2, Conceptual Site Plan: Label 150-foot buffer zone between the North Campus development and San Joaquin Marsh (i.e., zig zag dashed lines along eastern project edge) and specify that buildings and parking facilities are prohibited within this setback.
11. The proposed on-site circulation is not clear on the site plan. Show a detailed site plan depicting street connection(s) between the UCI Child Development Center, UCI Arboretum, Facilities Management & Distribution Services, and the proposed project.
12. Identify proposed onsite driveways with their respective street designation(s) that will be utilized for all existing and proposed sites.
13. Show roadway width dimensions on all private local streets.
14. Provide Jamboree/Birch St intersection improvement for the proposed project. Show proposed conceptual street configuration on a detailed site plan.

15. In addition to the Traffic Study comments below, upon providing a sidewalk on the eastside of Jamboree, access ramps in both the Northeast and Southeast corner will need to be installed per City Standard at Jamboree Rd & Birch intersection. New sidewalk and ramps must meet ADA guidelines following City Standards.

Traffic Study Comments:

16. Land Use Summary: Please include the AM, PM, and ADT trips for each of the proposed land uses and include UCI Center for Child Health land use, a summary of the total trips associated with 2007 LRDP and Proposed North Campus, and the difference in trips between the two scenarios.

17. Per the City's Traffic Impact Analysis Guidelines, if a project generates 50 or more peak hour trips during the AM or PM peak period, a comprehensive traffic study would be required. If a project generates between 1 and 49 trips, a limited scope traffic study would be required. Please submit the appropriate level of traffic study scope for review. The project is responsible for mitigating all impacts identified in the traffic study.

18. The project study area exhibit is missing from the NOP. The project study area boundary should be extended to include the following study area intersections for all study years: Culver at I-405 NB Ramps, Culver at I-405 SB Ramps, Culver/Michelson, and Culver/University.

19. Include a site map in the traffic study for the project site that shows dimensions of the driveways, distance between Jamboree/Birch and Jamboree/Access, connection to Graduate driveway, pedestrian sidewalk, and transit connectivity

20. Provide an 8 foot wide sidewalk on the eastside of Jamboree from Campus to Fairchild.

21. Provide class II on-street bike lane on the eastside of Jamboree from Campus to Fairchild

22. Jamboree/Access Driveway: Please provide access analysis that includes Transportation Design Procedure (TDP) - 4 (right-turn lane at driveways), TDP - 10 (distance between driveways and intersections), TDP -11 (corner clearance), TDP - 14 (driveway lengths), and TDP - 15 (gate stacking), if applicable. The City's TDP - 4 requires 250 foot right-turn lane with 90 foot taper at all major roadways such as Jamboree Road. The operational analysis must be consistent with City's TDPs.

23. Jamboree/Birch: Please provide access analysis that includes Transportation Design Procedure (TDP) - 1 (turn lane pocket length) for southbound left-turn, TDP - 14

(driveway lengths), and TDP – 15 (gate stacking), if applicable. The operational analysis must be consistent with City's TDPs.

24. The Graduate driveway currently provides connection to the project site. Provide trip distribution that shows the number of vehicles that would enter through Graduate driveway. Also, provide access analysis at this driveway that includes TDP -1 (turn lane pocket length), TDP – 4 (right-turn lane at driveways), and TDP -14 (driveway lengths). The operational analysis must be consistent with City's TDPs.
25. In the special issues section of the traffic analysis, provide discussion on pedestrian access and circulation, bicycle circulation, and transit facilities.
26. Please provide discussion on how the proposed project affects the 2007 LRDP mitigation measure findings. Please confirm the timing of the LRDP mitigation improvements and whether any changes result from the proposed project.

Thank you for the opportunity to review and comment on the proposed project. Staff would appreciate the opportunity to review any further information regarding this project as the planning process proceeds. If you have any questions, please contact Senior Planner Melissa Chao at 949-724-6395 or at mchao@cityofirvine.org.

Sincerely,



Marika Poynter
Principal Planner

ec: Kerwin Lau, Manager of Planning Services
Lisa Thai, Supervising Transportation Analyst
Melissa Chao, Senior Planner
Diane Vu, Senior Planner
Stan Ng, Associate Engineer



March 26, 2020

Ms. Lindsey Hashimoto, Senior Planner
Office of Physical and Environmental Planning
University of California, Irvine
4199 Campus Drive, Suite 380
Irvine, CA 92697
Via Email: hashimol@uci.edu

Subject: Notice of Preparation for the Irvine Campus Medical Complex Environmental Impact Report

Dear Ms. Hashimoto,

Thank you for the opportunity to comment on the Notice of Preparation for the Irvine Campus Medical Complex Environmental Impact Report (EIR). The City understands both the need and the value that this project would provide to the community and has provided the comments below as suggestions to address potential environmental issues. Please consider the following comments as you prepare the EIR:

Aesthetics

- a. Please include a visual impact analysis with visual simulations from appropriate viewpoints.

Transportation

- b. Include an analysis of local intersections, including intersections within the City of Newport Beach to determine if there is adequate capacity to accommodate the project. Include an appropriate Intersection Capacity Utilization (ICU) analysis. Please identify if any improvements are necessary to accommodate the increase in vehicles.
- c. The existing LRDP includes programmatic mitigation measures related to traffic. Please provide an update regarding payment of potential fair share fees and monitoring. Include an analysis of how the proposed LRDP amendment will influence the timing of future improvements. Will fair share fees be necessary to accommodate the increase in vehicle trips within the City of Newport Beach?

- d. Please make sure the proposed UCI Child Health Center on the adjacent site is included in the cumulative analysis.

Utilities

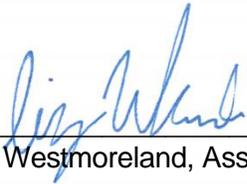
- e. Provide an analysis of utility capacity and any necessary improvements/upgrades. Will any improvements be required within the City of Newport Beach?

Alternatives

- f. Please include an alternative that provides direct vehicular access from Campus Drive, as it would seem to provide better access to the main campus and reduce the traffic increase to the Jamboree corridor (and specifically the Jamboree/Campus and Jamboree/Birch intersections).

Thank you for your consideration. If you have any questions, please contact me at 949-644-3234 or lwestmoreland@newportbeachca.gov. We would be happy to discuss our comments and questions with you.

Thank you,



Liz Westmoreland, Associate Planner

From: yelenaostrovsky@aol.com
To: [Lindsey Hashimoto](#)
Subject: Irvine Campus Medical Complex
Date: Saturday, February 29, 2020 9:06:31 AM

As residents of Central Park West on Jamboree, we object to the construction of the UCI Medical Complex in this location. Traffic situation on Jamboree is already burdensome for the residents and the construction of this new medical facility will make it unbearable.

From: [Robertson, Glenn@Waterboards](mailto:Robertson,Glenn@Waterboards)
To: [Lindsey Hashimoto](mailto:Lindsey.Hashimoto)
Cc: Reeder, Terri@Waterboards
Subject: NOP for EIR, UCI Medical Complex
Date: Wednesday, March 4, 2020 8:16:45 PM

To Lindsey Hashimoto, Senior Planner, University of California, Irvine:

The Santa Ana Regional Water Quality Control Board has just received and looked over the UCI proposal for the Irvine Campus Medical Complex (Project), near Jamboree and Campus Drive. The Project's back portion (parking structure) would extend no farther than the current pathway at the edge of the San Joaquin Marsh Preserve.

However, could your pending Environmental Impact Report please address whether dewatering would be necessary for the Medical Complex buildings, including dewatering for any piers sunk into groundwater or into intruded seawater? If any dewatering discharges were to go into the Marsh, or even to a storm drain leading to upper Newport Bay, then the Regional Board's *de minimus* permit for the Newport Bay watershed is expected to apply, including monitoring for selenium. Thank you very much Lindsey....Glenn Robertson, CEQA Coordinator.

Glenn S. Robertson
Engineering Geologist, PG, M.S.
Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501

Phone (951) 782-3259
Fax (951) 781-6288
Email Glenn.Robertson@waterboards.ca.gov



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

March 17, 2020

hashimol@uci.edu

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

Notice of Preparation of an Environmental Impact Report for the Proposed University of California, Irvine Campus Medical Complex

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the EIR upon its completion and public release. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

South Coast AQMD has also developed both regional and localized significance thresholds. South Coast AQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

to South Coast AQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts. South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found here at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs 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 analysis by either using the LSTs developed by South Coast AQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed 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, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency 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 at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

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 Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

In the event that the Proposed 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 these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

- Chapter 11 “Mitigating the Impact of a Project” of South Coast AQMD’S *CEQA Air Quality Handbook* South Coast AQMD’s CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- South Coast AQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- South Coast AQMD’s Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits

If implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the EIR. For more information on permits, please visit South Coast AQMD’s webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385.

Data Sources

South Coast AQMD rules and relevant air quality reports and data are available by calling South Coast AQMD’s Public Information Center at (909) 396-2001. Much of the information available through the Public Information Center is also available at South Coast AQMD’s webpage at: <http://www.aqmd.gov>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that project’s air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

From: [Anne B. Cassingham](#)
To: [Lindsey Hashimoto](#)
Subject: Mailing List for Draft EIR
Date: Monday, March 2, 2020 11:10:34 AM
Attachments: [image001.png](#)

Dear Ms. Hashimoto,

Would you please add the following name for the mailing list for the Draft EIR for the UCI Irvine Campus Medical Complex:

William A. Shopoff, President
Shopoff Realty Investments, LP
2 Park Plaza, Suite 700
Irvine, CA 92614

It would be most appreciated if you confirm receipt of this request and let me know if you need any further information.

Thank you and Happy Monday!

Anne Cassingham

Executive Assistant to Bill Shopoff



Shopoff Realty Investments, L.P.
2 Park Plaza, Suite 700, Irvine, CA 92614
M (949) 417-1396 | D (949) 417-9944 | F (949) 417-1399

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