



May 25, 2005

Job Number: 1416-002

Long Beach Memorial Medical Center Expansion
ATTORNEY-CLIENT PRIVILEGE WORK PRODUCT

MEMORANDUM FOR THE RECORD

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TO: City of Long Beach
(Ms. Angela Reynolds and Mr. Mike Mais)

FROM: Sapphos Environmental, Inc.
(Ms. Marie Campbell)

SUBJECT: Summary of the Technical and Procedural Adequacy
of the Long Beach Memorial Medical Center
Expansion Environmental Impact Report

This Memorandum for the Record (MFR) summarizes the technical and procedural adequacy of the Long Beach Memorial Medical Center (LBMMC) Expansion Environmental Impact Report (EIR) that has been prepared consistent with the provisions of (a) the California Environmental Quality Act (CEQA), Division 13, Environmental Protection and corresponding guidelines of the California Public Resources Code and (b) Title 14 of the California Code of Regulations, Chapter 3, Guidelines for the Implementation of the California Environmental Quality Act (State CEQA Guidelines).

In its consideration and evaluation of the 2005 Master Plan for the LBMMC campus (Campus), and capital improvements recommended by the hospitals to meet the community's existing and anticipated needs for health care services through the 2020 planning horizon, the City of Long Beach (City) has conformed to a three phase process that is inherent to CEQA.

Phase I

Long Beach Memorial Medical Center (LBMMC), acting on behalf of both licensed hospitals, Long Beach Memorial Hospital and Miller Children's Hospital, submitted an application to the City for the capital improvements recommended to meet existing and anticipated 2020 needs in the community for health care services. As a result of pre-application consultation, and review of the application, the City notified LBMMC of the need to complete a Master Plan for the Campus reflecting the integration of the proposed improvements. The City determined the application to be completed. The City notified LBMMC that together, the Master Plan and proposed capital improvements, constituted a project that would be subject to the discretionary approval of the City. The City notified LBMMC that the project could not be considered pursuant to one of the categorical exemptions established in CEQA due to the existing conditions, the scope of the modifications to zoning and land use contemplated by the Master Plan, and the extent of the grading activities required to implement the improvements. The City notified LBMMC of the need to evaluate the project pursuant to the provisions of CEQA and consistent with the State CEQA Guidelines.

Phase II

The City required the retention of a team of qualified technical professionals to prepare an initial study to support the determination of the appropriate level of environmental documentation to be prepared for the LBMMC Expansion (proposed project). The consulting firm of Sapphos Environmental, Inc. was retained to prepare the environmental documentation required pursuant to CEQA. Sapphos Environmental, Inc. was selected based on the recommendations of other public sector clients for whom they had prepared or are preparing EIRs of comparable complexity: County of Los Angeles Chief Administrative Office, County of Los Angeles Department of Parks and Recreation, County of Ventura, and City of Los Angeles. An additional consideration in the selection of Sapphos Environmental, Inc. was the excellent track record of environmental documents prepared by the firm for other lead agencies in successfully withstanding all CEQA litigation challenges. Sapphos Environmental, Inc. retained a team of technical consulting and engineering firms to assist in the preparation of the required environmental analysis:

- SCS Engineers: air quality, geology and soils, and hazards and hazardous materials

- VSA n Associates: noise study
- Linscott, Law & Greenspan: traffic impact study and parking analysis
- Moffat & Nichol: hydrology and drainage, and utilities and service systems

An initial study was prepared for the proposed project. The Initial Study includes an environmental checklist, supported by substantial evidence, including extensive consultation with responsible agencies and review of available technical reports, including preliminary soil reports, parking study, and traffic data. The analysis undertaken for the Initial Study resulted in the determination that the proposed project had the potential to result in significant impacts in 11 environmental issue areas: aesthetics, air quality, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, National Pollution Discharge Elimination System, noise, public services, transportation and traffic, and utilities and service system. Of the 11 issues areas, there was uncertainty regarding the ability to reduce impacts to below the threshold of significance for two issues: air quality and transportation and traffic.

As a result of the analysis contained in the Initial Study, the City determined to prepare an environmental impact report.

Phase III

The City prepared a Notice of Preparation (NOP) that was distributed to the Governor's Office of Planning and Research, the County Clerk, and responsible and trustee agencies, and made available at the City and in local libraries for review by other interested parties. The NOP was advertised in the local newspaper, the *Press Telegram*, and posted on the fence on the four boundaries of the Campus. In addition, a Notice of Availability of the NOP and Initial Study for review by interested parties was mailed to adjacent property owners. The NOP was circulated for a 30-day review period that began on August 23, 2004 and closed on September 23, 2004.

A scoping meeting was held on September 8, 2004 and attended by 40 individuals.

The City reviewed the comments received from the public at the scoping meeting and six additional letters of comments resulting from public review of the NOP and initiated preparation of the required technical studies and EIR.

Subsequent to the close of the public review period for the NOP, the City made an additional presentation regarding the proposed project at a combined meeting of the Neighborhood Associations for Wrigley, Memorial Heights, and Sunrise Historic.

A Screen Check Draft EIR was prepared and submitted to the following departments at the City of Long Beach for their review and independent judgment:

- Planning and Building: Greg Carpenter, Angela Reynolds, Craig Chalfant, Jill Griffiths, Lynette Ferenczy, Anita Garcia, Ken Kayastha, Jerry Olvera, and Jorge Ramirez
- Department of Public Works: Dave Roseman, Sumire Gant, Jorge Magana, and Ed Norris
- Health Department: Jeff Benedict
- Energy Department: Mike Zukowski
- Water Department: Larry Oaks
- Police Department: Michael Weber
- Fire Department: Jerry Berryman and David Zinnen

As a result of that review, the consulting team was directed to undertake additional coordination with the Department of Toxic Substances Control (DTSC) that resulted in LBMMC entering into a Voluntary Clean-up Agreement (VCA) providing a direct mechanism for regulatory oversight of the work plans, site characterization studies, and health risk assessments. Pursuant to the VCA, LBMMC agreed to expand the scope of the work plan for the site characterization study through the provision of additional borings, bringing the total to approximately 70. In addition, piezometers were installed to characterize near-surface groundwater conditions. The sampling was expanded to address an array of over 100 chemicals of potential concern. LBMMC agreed to rerun the health risk assessment to include the additional data from the expanded site characterization study. The results of the expanded studies support the results of preliminary studies that were used as the basis for the EIR.

The City requested that the results of the complex site characterization studies and health risk assessments be peer-reviewed. The scope of the review includes work plans, site characterization studies, health risk assessments, a remedial action plan, and all input to the EIR related to regulatory framework, baseline conditions, impact analysis, and mitigation measures. In compliance with City requirements, the firm of Kleinfelder Associates was retained to provide peer review.

During preparation of revisions in response to the City's review, the project was presented to the Planning Commission at a study session on December 2, 2004 which was noticed through the City's standard noticing process. The Planning Commission study session was a public meeting.

The Screen Check EIR was revised in response to City comments and additional comments received at the Planning Commission study session, and a galley proof was prepared. The City reviewed the galley proof and the EIR was submitted to a professional publishing house for reproduction.

The Draft EIR was circulated for public review between January 25 and March 10, 2005. A Notice of Completion was posted at both the Governor's Office of Planning and Research and the Office of the Los Angeles County Clerk on January 25, 2005. A Notice of Availability (NOA) of the Draft EIR for public review was then advertised in the *Press Telegram*. The NOA was also forwarded via regular mail to 148 interested parties, including agencies potentially having an interest in this proposed project. Copies of the Draft EIR and NOA were mailed directly to 38 agency representatives. The Draft EIR was made available for public review at the City Department of Planning and Building, posted on the City Web site, and made available for review at three local libraries. The NOA was provided to each resident occupying a rental unit owned by LBMMC that could be demolished to accommodate surface parking required to operate Phase I of the Todd Cancer Institute, an element of the 2005 Master Plan. Several parties contacted the City during the public review period to request copies of documents referenced in the Draft EIR. Those parties were invited to review the documents at the City or Sapphos Environmental, Inc. or to have copies of the documents provided to them at cost.

During the public review of the Draft EIR, the City hosted a second Planning Commission study session on February 17, 2005 that was open to the public. At that meeting, City staff and the consulting team presented a summary of the EIR findings, including significant impacts, mitigation measures, and alternatives. City staff and the consulting team responded to questions raised by the Planning Commission and the public.

The City received a total of 19 letters of comment on the Draft EIR.

A Screen Check Final EIR was prepared for review by the City. In the course of preparing the Responses to Comments, contact was made with all responsible agencies and organizations that provided letters of comment to ensure that the technical specialists understood the scope and nature of the comments. The Final EIR consists of a copy of each letter of comment received in response to circulation of the Draft EIR for public review, responses to comments received, clarifications and revisions to the EIR responding to the comments received, and supplemental technical appendices referenced in the response to comments.

A copy of the Final EIR, containing the letters of comment and responses to letters of comment was provided to all parties that commented on the Draft EIR, ten days prior to the Planning Commission's consideration of the Final EIR.

cf: Mr. Andre Anderson
Ms. Juliana Prospero
Ms. Nuna Tersibashian