

**Final
Environmental Impact Report
for the
Ventura County Medical Center Expansion**

SCH # 93041042

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Prepared For:

Ventura County Public Works Agency

* * * * *

Prepared By:

FUGRO-McCLELLAND (WEST), INC.
2140 Eastman Avenue / Ventura, California 93003

The Environmental Report Review Committee recommends the decision making body of the proposed project find this document has been completed in compliance with the California Environmental Quality Act.

Robert K. Laughlin
Chair, Environmental Report Review Committee

DEC. 15, 1993
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December 1993

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DATE: 10/10/00

PROJECT NO: 000296

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1.0 INTRODUCTION

1.1 PURPOSE/LEGAL AUTHORITY

The proposed Ventura County Medical Center (VCMC) expansion involves the redevelopment of portions of the VCMC campus to provide improved medical and medical examiner facilities, as well as increased parking capacity. The project would entail the demolition or removal of 81,888 square feet of existing facilities and the construction of 144,003 square feet of new facilities. The net increase in building floor area on the campus would be 62,115 square feet. A 500-space multiple level parking structure would also be constructed while 229 existing surface spaces would be removed, thereby resulting in a net increase of 271 parking spaces.

In accordance with Section 15121 of the *State CEQA Guidelines*, the purpose of this Environmental Impact Report (EIR) is to serve as an informational document that:

"... will inform public agencies, decision-makers and the public generally of significant environmental effects, identify possible ways to minimize the significant effects, and describe alternatives to the project ..."

1.2 SCOPE AND CONTENT

In accordance with the *State CEQA Guidelines*, an Initial Study was prepared for the proposed project and a Notice of Preparation (NOP) was distributed on May 27, 1993. The Initial Study examined the 29 environmental issue areas on the Ventura County Initial Study Checklist and determined that the proposed project could result in significant impacts on the environment in five environmental issue areas; therefore, an EIR was required. The NOP and Initial Study are presented in their entirety in Appendix 1.2.

This EIR addresses the issues determined by the Initial Study, responses to the NOP (Appendix 1.2), and scoping responses to warrant additional analysis beyond that which was conducted in the Initial Study. These issues are:

- Land Use
- Aesthetics/Shadow/Light and Glare
- Transportation and Circulation
- Air Quality
- Noise

Since the preparation of the Initial Study and circulation of the NOP, some minor revisions to the proposed project have been made. These include a 13,755-square-foot reduction in the size of the proposed Ambulatory Care Clinic, a 64-space reduction in required spaces in the proposed parking structure, and the demolition of one additional structure (the existing Coroners Building).

1.0 Introduction

This EIR addresses the issues referenced above and identifies potentially significant environmental impacts, including site-specific and cumulative effects of the proposed project, in accordance with the provisions set forth in the *State CEQA Guidelines*. In addition, the EIR recommends feasible mitigation measures, where possible, that would reduce or eliminate adverse environmental effects.

The Alternatives section of the EIR is prepared in accordance with Section 15126(d) of the *State CEQA Guidelines*, and focuses on alternatives capable of eliminating or reducing significant adverse environmental effects associated with the project to levels of insignificance while feasibly attaining the basic objectives of the project. In addition, the EIR identifies one "environmentally superior" alternative from the alternatives assessed. The alternatives evaluated include the "No Project" Alternative and four onsite development scenarios. The Alternative section also discusses the feasibility of implementing the proposed project at alternative site locations.

The County hosted a public meeting on the proposed project on April 27, 1993. This optional step attracted approximately 30 members of the public to learn more about the project and the EIR process, and to allow them to express their views about issues that should be addressed in the EIR. The County also hosted public informational meetings on April 22, 1993 and July 8, 1993 to discuss the project and provide update. The comments provided at the public meeting and a number of letters received from various public agencies and citizens helped to shape the scope of work for the EIR.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and all applicable court decisions. The *State CEQA Guidelines* provide the standard of adequacy on which this document is based. The *Guidelines* state:

"An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but, the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure."
[emphasis added] (Section 15151).

1.3 LEAD, RESPONSIBLE AND TRUSTEE AGENCIES

Because it has principal responsibility for approving the project, the County of Ventura is the lead agency for the EIR. There are no responsible or trustee agencies for the project.

2.0 SUMMARY

This section provides a brief synopsis of the characteristics of the proposed project, a discussion of areas of public controversy, a description of the project alternatives and their environmental impacts, and a summary of the environmental consequences of implementing the proposed project.

2.1 PROJECT SYNOPSIS

The project analyzed herein is the Ventura County Medical Center (VCMC) expansion proposed by the County of Ventura Public Works Agency. The project involves the redevelopment of portions of the VCMC campus to provide improved medical and medical examiner facilities, as well as increased parking capacity. Under the proposed project, three new structures would be built totalling 144,003 square feet of building area. These include a new one-story Mental Health In-Patient Unit, a new one-story Medical Examiner facility, and a five-story Ambulatory Care Clinic that would consolidate a number of currently dispersed onsite facilities. A three-level parking structure would also be built while 81,888 square feet of existing facilities would be demolished. The overall increase in onsite building area would be 62,115 square feet.

There are three primary objectives for implementing the proposed project. These include the following:

- To relieve current overcrowded conditions in the Mental Health In-Patient Unit, Medical Examiners Office, and other campus facilities;
- To provide medical and medical examiner services from coordinated and centralized locations; and
- To provide additional parking to better accommodate the current demand for parking and to compensate for the loss of onsite parking that would result from new building construction.

2.2 AREAS OF PUBLIC CONTROVERSY

A number of residents along the west side of Agnus Drive, immediately east of the VCMC campus, have expressed concern about the environmental consequences of constructing the proposed Ambulatory Care Clinic and parking structure at public meetings held on April 22 and 28 and July 8, 1993, as well as in responses to the Notice of Preparation. Concerns have been focused primarily on the land use and aesthetic issues related to the alteration of views from Agnus Drive that would result from construction of these multi-level structures. Land use and aesthetic impacts are discussed in Sections 5.1 and 5.2 of this EIR.

2.3 ALTERNATIVES

The EIR evaluates five onsite alternatives to the proposed project. The onsite alternatives include the CEQA-required "No Project" alternative and four alternative siting scenarios. Alternatives 1 and 2 would relocate the proposed parking structure, Alternative 3 would reverse the positions of the ACC and Mental Health Unit, and Alternative 4 would move the ACC south to the location of the Old Building of the existing hospital, reduce its height to three stories, and consolidate the ACC and Old Building into one addition.

Transportation, air quality, and noise impacts would not differ substantially under any of the alternative siting scenarios and would be less than significant under all. Land use and aesthetic impacts associated with Alternatives 1 and 2 would be marginally lower than those of the proposed project but would not be substantially different. Alternative 3 would alleviate the proposed project's land use and aesthetic impacts to Agnus Drive residences. However, it would cause a greater impact on the viewshed from the Loma Vista Road corridor and would continue to be inconsistent with certain City of Ventura land use and aesthetic policies. Alternative 4 would not eliminate the proposed project's land use or aesthetic impacts to Agnus Drive residences, but would reduce impacts to those residences without further impacting the Loma Vista Road corridor. The height of the ACC would be consistent with City of Ventura height restrictions under Alternative 4.

Because it would have no impact, the No Project Alternative is considered the overall Environmentally Superior Alternative. Among the remaining alternatives, Alternative 4 is considered environmentally superior because it would reduce impacts to Agnus Drive residences without causing additional impacts elsewhere.

The EIR also examines the feasibility of implementing the proposed project on three alternative sites. This analysis determined that other sites could not feasibly be used, based upon criteria set forth by the California Supreme Court in *Citizens of Goleta Valley v. Board of Supervisors* (1990).

2.4 SUMMARY OF ENVIRONMENTAL IMPACTS

Table 2.4-1 summarizes the environmental consequences of implementing the proposed project, mitigation measures recommended to alleviate identified impacts, and the residual impacts following mitigation. The table is organized in the order in which the environmental issues are examined in Section 5.0, Environmental Impact Analysis. All significant residual impacts will require a Statement of Overriding Considerations by the County decision-making body if the proposed project is approved.

Table 2.4-1. Summary Table

<u>DESCRIPTION OF IMPACT</u>	<u>MITIGATION MEASURES</u>	<u>RESIDUAL IMPACT</u>
<p>LAND USE</p> <p>The intensification of land use and increase in building height associated with the Ambulatory Care Clinic (ACC) would increase the existing scale compatibility issue with adjacent Agnus Drive residences. This is considered a significant land use impact.</p> <p>The 75-foot ACC would exceed the 45-foot height limitation in the City of Ventura's H Zone while the Mental Health Unit would not meet the H Zone's setback requirements. Though the County is not legally bound to adhere to City zoning standards for projects on County-owned property, this is considered a direct zoning inconsistency.</p>	<p>Project design features and aesthetics mitigation measures would serve to reduce compatibility conflicts associated with the ACC. However, outside of reducing the height of the structure, no measures would fully mitigate impacts.</p> <p>None available.</p>	<p>Significant.</p> <p>Zoning policy inconsistencies would remain.</p>
<p>AESTHETICS/SHADOW/LIGHT AND GLARE</p> <p>Temporary obstruction of views would occur during project construction. This impact is considered adverse, but less than significant.</p> <p>The five-story ACC would have a significant aesthetic impact due to the intensification of scale as compared to adjacent residential uses and resulting alteration of views from some Agnus Drive residences.</p>	<p>AES-1. Demolition Housekeeping Plan. Prior to the commencement of demolition activities, the County and contractor(s) should jointly prepare a demolition/construction good-housekeeping plan for the project. The plan should include such information as designation of onsite locations for materials and equipment storage, schedule for debris removal, description of proposed screening mechanisms, etc.</p> <p>AES-3. Utility Undergrounding. The existing Southern California Edison (SCE) telephone and cable TV utility lines strung along the border of the VCMC campus and adjacent residential properties along the west side of Agnus Drive shall be reinstalled underground and the utility poles removed. The undergrounding shall take place in accordance with SCE practices and induce a minimal amount of inconvenience for neighborhood residents.</p>	<p>Less than significant.</p> <p>Although AES-3 would improve visual conditions to Agnus Drive residences, impacts would remain significant.</p>

Table 2.4-1 (Continued)

<u>DESCRIPTION OF IMPACT</u>	<u>MITIGATION MEASURES</u>	<u>RESIDUAL IMPACT</u>
<p>AESTHETICS/SHADOW/LIGHT AND GLARE (Continued)</p> <p>Up to four potentially landmark-quality trees would be removed during project site clearance and construction. This impact is considered significant.</p>	<p>AES-4. Specimen Tree Replacement. In instances where the siting of proposed structures would result in the removal of trees over 50 feet in height, a specimen of an equivalent type and of a minimum box size of 24 inches shall be planted as a replacement. The replacement location shall be selected by the landscape architect for the site, and shall be as close as feasible to the original location, where consistent with improving the viewshed.</p>	<p>Less than significant.</p>
<p>Upon completion of the Mental Health In-Patient Unit, the front yard setback along Loma Vista Road would no longer be consistent, as the Mental Health Unit would extend closer to the street. This impact is not considered significant, but may be adverse to some viewers.</p>	<p>None required.</p>	<p>Less than significant.</p>
<p>The ACC would cast shadows on Agnus Drive yards during late afternoon hours in the winter. Structures would not, however, be affected. Impacts are considered less than significant.</p>	<p>None required.</p>	<p>Less than significant.</p>
<p>Headlights of vehicles in the parking structure could illuminate some Agnus Drive residences. This is a potentially significant impact.</p>	<p>AES-5. Parking Structure Walls/Landscaping. The parking structure shall be designed with sufficient facade articulation so as to alleviate monolithic effect. Walls shall be of sufficient height to block vehicular lighting from projecting outside of the structure. The landscaping scheme shall include plants which will serve to buffer the structural massing.</p>	<p>Less than significant.</p>
<p>Parking structure lighting would have the potential to flood nearby residential areas with undesired lighting. This is considered a potentially significant impact.</p>	<p>AES-6. Parking Structure Lighting. The lighting for the proposed parking structure's rooftop level will be mounted on the lowest standards allowed by building code, and would be properly hooded and directed so as to eliminate any direct pooling of light onto residential properties.</p>	<p>Less than significant.</p>

2.0 Summary

Table 2.4-1 (Continued)

<u>DESCRIPTION OF IMPACT</u>	<u>MITIGATION MEASURES</u>	<u>RESIDUAL IMPACT</u>
<p>AESTHETICS/SHADOW/LIGHT AND GLARE (Continued)</p> <p>The proposed project would be potentially inconsistent with City of Ventura visual policies 1.12, 2.1, 3.1, 3.2, and 6.2.</p>	<p>AES-2. Design Plans Coordination. The proposed architectural and landscaping plans for the proposed structures should, under County supervision, be modified by their respective architects and landscape architects to ensure that features that would serve to create design linkages between the buildings (such features can include surface textures and materials, finish colors, landscaping palette and hardscape materials and patterns, consistent window and door treatments etc.)</p>	<p>With mitigation, project would be consistent with policies 1.12 and 6.2. Inconsistency with policies 2.1, 3.1 and 3.2 would remain.</p>
<p>TRANSPORTATION AND CIRCULATION</p>		
<p>Project implementation would generate an additional 640 daily trips, with 64 trips being generated during the PM peak hour. These additional trips would not significantly affect any of the seven study intersections. Cumulative development in the City would, however, cause significant impacts at three intersections.</p>	<p>No mitigation is required for project impacts. As a facility administered by a public agency, the County is not currently required to contribute to the City's Traffic Mitigation Fee Program to address cumulative traffic impacts. If asked by the City, the County will provide a reasonable share to mitigate the cumulative impact.</p>	<p>Less than significant.</p>
<p>AIR QUALITY</p>		
<p>Project construction activity would generate nitrogen dioxide emissions.</p>	<p>AQ-2. Equipment Turnoff. All diesel-powered equipment should be turned off when not in use for more than 30 minutes and gasoline-powered equipment should be turned off when not in use for more than 5 minutes.</p>	

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Table 2.4-1 (Continued)

<u>RESIDUAL IMPACT</u>	<u>MITIGATION MEASURES</u>	<u>DESCRIPTION OF IMPACT</u>
<u>AIR QUALITY (Continued)</u>		
Less than significant.	<p>AQ-1. Two-Foot Freeboard. Trucks transporting earth material offsite shall maintain a minimum 2-foot freeboard.</p> <p>AQ-3. Daily Watering. The entire construction area shall be watered twice daily.</p> <p>AQ-4. Roadway Sweeping. Roadways in the vicinity of construction access points shall be swept as necessary to prevent the accumulation of silt.</p> <p>None required.</p>	<p>Construction-related PM₁₀ emissions have the potential to substantially contribute to local exceedances of the State PM₁₀ standards. This impact is considered significant.</p>
Less than significant.	<p>AQ-5. Bicycle Racks. Bicycle racks shall be provided in a convenient location to encourage bicycle use by VCMC employees.</p> <p>AQ-6. Bicycle Lanes. Bicycle lanes shall be constructed to link project bicycle racks to existing Class II bicycle lanes on Loma Vista Road.</p> <p>AQ-7. Low Emission Space Heaters. Space heaters used in all project development shall be low emission designs. Commercial space heaters should be certified by the manufacturer to generate no more than 40 nanograms of NO₂ per joule heat output. This would reduce space heating emissions by up to 79 percent (EPA, 1983).</p>	<p>Operation of the proposed parking structure would increase carbon monoxide concentrations in the immediate vicinity of the structure. However, concentrations would remain substantially below State standards and would be less than significant.</p> <p>Because the proposed project is consistent with the Ventura County AQMP, cumulative impacts are considered less than significant. Nevertheless, cumulative development would result in the incremental degradation of regional air quality.</p>

Table 2.4-1 (Continued)

RESIDUAL IMPACT

MITIGATION MEASURES

DESCRIPTION OF IMPACT

AIR QUALITY (Continued)

AQ-8. Maximize Thermal Integrity. All new structures shall maximize thermal integrity through the use of insulation, dual-pane windows, advanced window glazing to reduce heating and cooling requirements and associated emissions. Solar assisted water heaters shall be installed when feasible.

NOISE

Project construction would generate intermittent noise during the 3-year construction period. Residences along Agnus Drive would experience noise at potentially significant levels. Impacts would be adverse, but are considered less than significant, due to their temporary nature.

Less than significant.

NOI-1. Muffler Exhaust Systems. All construction equipment, fixed or mobile, operated on the VCMC campus shall be equipped with properly operating muffler exhaust systems.

NOI-2. Equipment Placement. When feasible, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receptors.

NOI-3. Stockpiling and Vehicle Staging. Stockpiling and vehicle staging areas shall be located as far as practical from sensitive receptors.

NOI-4. Construction Activity Consolidation. When feasible, the noisiest construction operations should be arranged to occur together in the construction program to avoid continuing periods of greater annoyance.

Table 2.4-1 (Continued)

<u>DESCRIPTION OF IMPACT</u>	<u>MITIGATION MEASURES</u>	<u>RESIDUAL IMPACT</u>
<p><i>NOISE (Continued)</i></p> <p>Noise associated with the parking structure would not exceed City thresholds. However, peak noise levels associated with engine start-ups, tire squeal, and car alarms at the parking structure could be annoying to nearby residents.</p>	<p>NOI-5. Non-Squeal Paving. Non-squeal paving finishes shall be used within the parking structure and on all external ramps of the parking structure.</p> <p>NOI-6. Walls. The design of the parking structure shall incorporate features (such as solid walls of baffles on the east elevation) to reduce noise impacts to the nearest residential areas.</p> <p>NOI-7. Speed Bumps. Speed bumps shall be incorporated into the parking structure to reduce vehicle speeds.</p> <p>NOI-8. Rubberized Expansion Plates. Parking structure expansion plates shall be of rubberized materials to reduce noise generated by vehicular movement.</p> <p>NOI-9. Sweeper Operation Restrictions. If noise problems arise from parking structure sweeper operations, sweeping activities shall be restricted to the hours determined appropriate by the County of Ventura.</p>	<p>Less than significant.</p>

3.0 PROJECT DESCRIPTION

The proposed project analyzed herein is known as the Ventura County Medical Center (VCMC) expansion project. This Project Description includes information relative to the features of the proposed project. These include the project proponent and location, existing facilities at the subject site, the proposed physical changes, and the objectives to be accomplished by the proposed project.

3.1 PROJECT PROPONENT

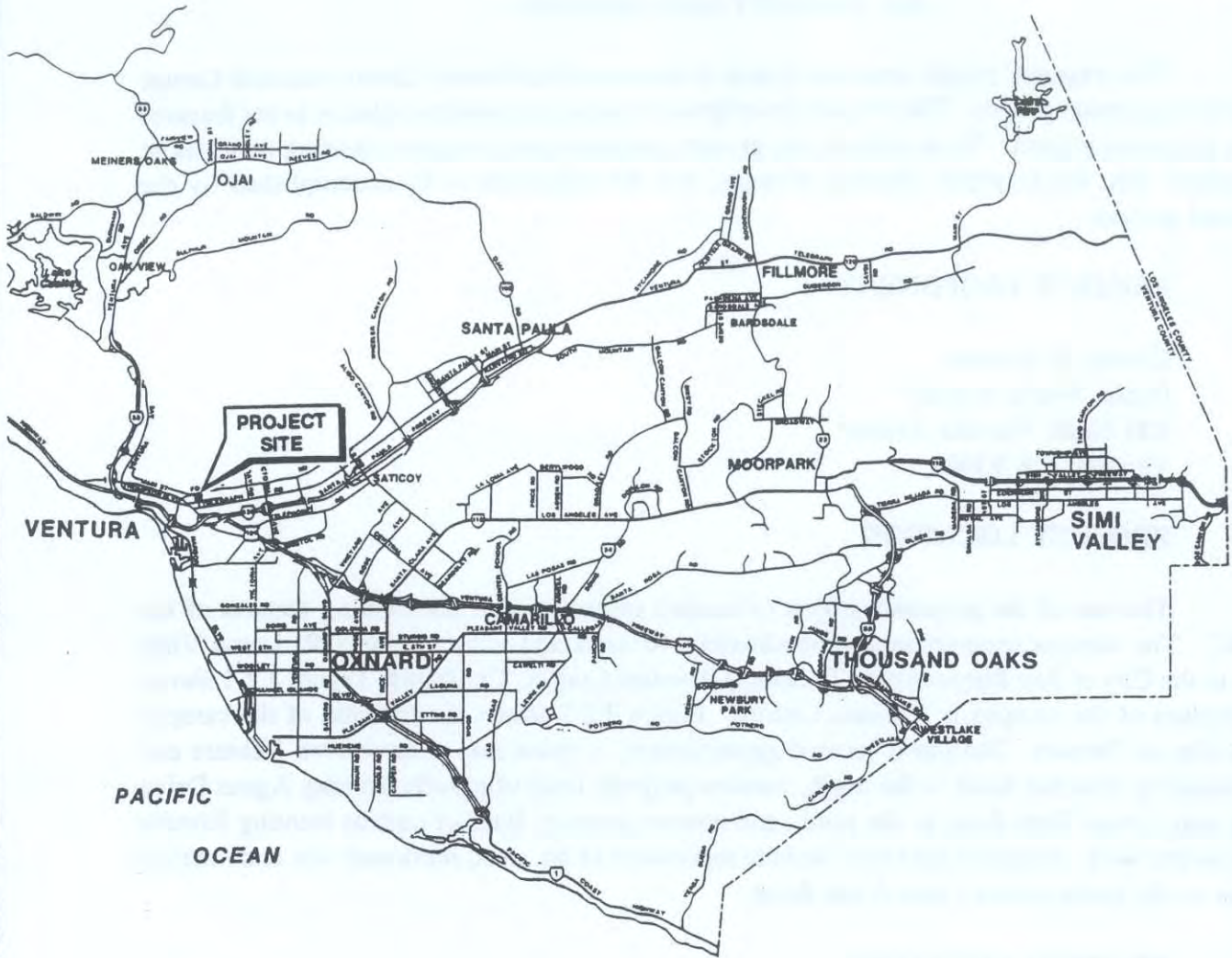
County of Ventura
Public Works Agency
800 South Victoria Avenue
Ventura, CA 93009

3.2 PROJECT LOCATION

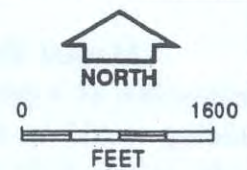
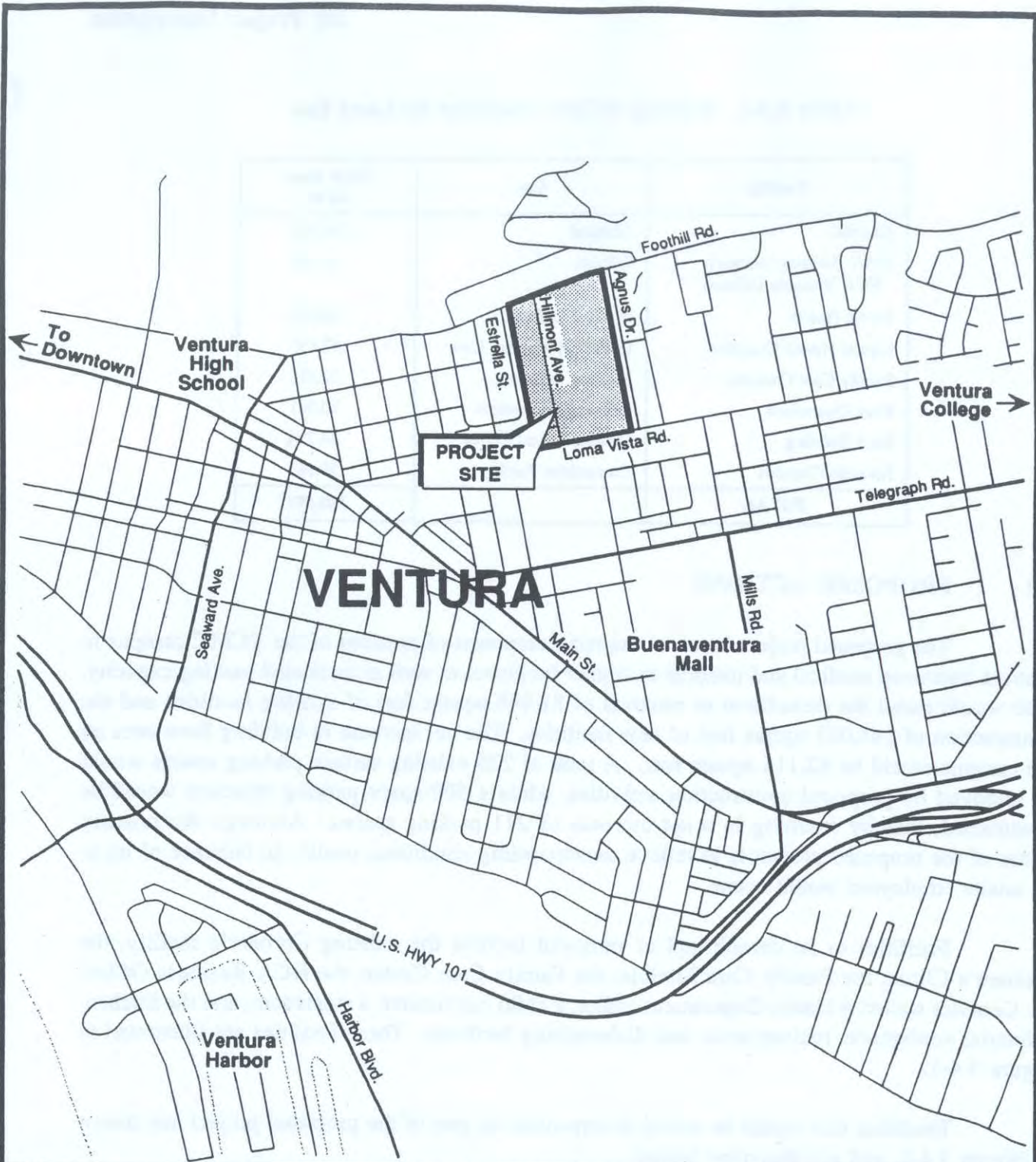
The site of the proposed project is located entirely within the existing campus of the VCMC. The campus encompasses approximately 40 acres and is located at 3291 Loma Vista Road in the City of San Buenaventura (Ventura), Ventura County, California. Figure 3.2-1 shows the location of the campus in Ventura County. Figure 3.2-2 shows the location of the campus in the City of Ventura. The site is located approximately 2 miles east of downtown Ventura and is bounded by Foothill Road to the north, western property lines of parcels fronting Agnus Drive to the east, Loma Vista Road to the south, and eastern property lines of parcels fronting Estrella Street to the west. Adjacent land uses include residences to the west, north and east and medical offices to the south across Loma Vista Road.

3.3 EXISTING FACILITIES

Existing facilities at the VCMC campus include 60 structures on 40 acres, which total 398,157 square feet of floor area. Onsite land uses include a hospital, various medical clinics and offices, a juvenile corrections complex, maintenance facilities, and a laundry facility. The structures and facilities on the project site can be grouped into eight complexes, based on location within the site and activity. These groupings are listed in Table 3.3-1 and are illustrated in Figure 3.3-1.



REGIONAL LOCATION



PROJECT LOCATION

000313

3.0 Project Description

Table 3.3-1. Existing VCMC Facilities By Land Use

Facility	Use	Floor Area (sq ft)
Hospital	Hospital	178,995
PSSA Building (formerly HCA Business Offices)	Offices	25,140
Public Health	Medical Offices	18,312
Mental Health Complex	In-Patient Medical Care	37,655
Family Care Complex	Medical Offices	32,555
Plant Operations	Offices/Maintenance	30,581
Bard Building	Office/Medical Office	24,754
Juvenile Complex	Corrections Facility	50,165
TOTAL		398,157

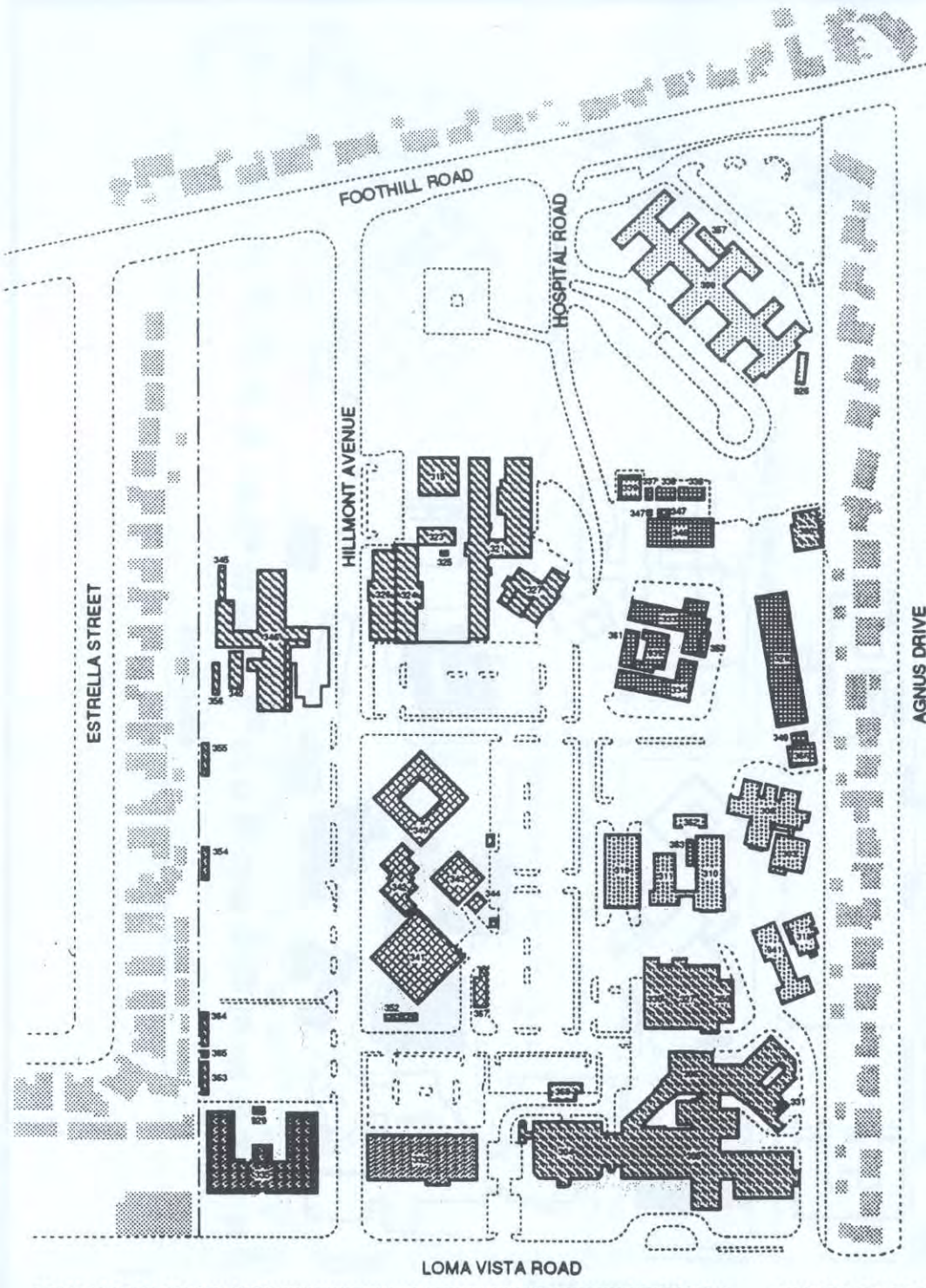
3.4 PROPOSED ACTIONS

The proposed project involves the redevelopment of portions of the VCMC campus to provide improved medical and medical examiner facilities, as well as increased parking capacity. This would entail the demolition or removal of 81,888 square feet of existing facilities and the construction of 144,003 square feet of new facilities. The net increase in building floor area on the campus would be 62,115 square feet. A total of 229 existing surface parking spaces would be removed by proposed construction activities, while a 500-space parking structure would be constructed, thereby resulting in a net increase of 271 parking spaces. Although the primary intent of the proposed project is to relieve overcrowding conditions onsite, an increase of up to 56 onsite employees would occur.

Facilities to be demolished or removed include the existing Coroner's facility, the Women's Clinic, the Family Care Module, the Family Care Center, the HCA Business Office, the Genetics trailer, a Health Department trailer, a child care center, a storeroom, and the kitchen, cafeteria, conference, maintenance, and dishwashing facilities. These facilities are illustrated in Figure 3.4-1.

Facilities that would be added or expanded as part of the proposed project are shown in Figure 3.4-2, and are described below.

Mental Health In-Patient Unit. This component of the project would involve the construction of a one-story, 31,003-square-foot in-patient unit. The 25,140-square-foot PSSA Building would be demolished to accommodate this building. The new Mental Health Unit would include three patient wings with a total capacity of 43 beds (a 15-bed expansion over the existing facility), a nurses' station, group rooms, an occupational therapy room, and recreational areas. The existing Mental Health In-Patient Unit (Building 341) would be vacated and



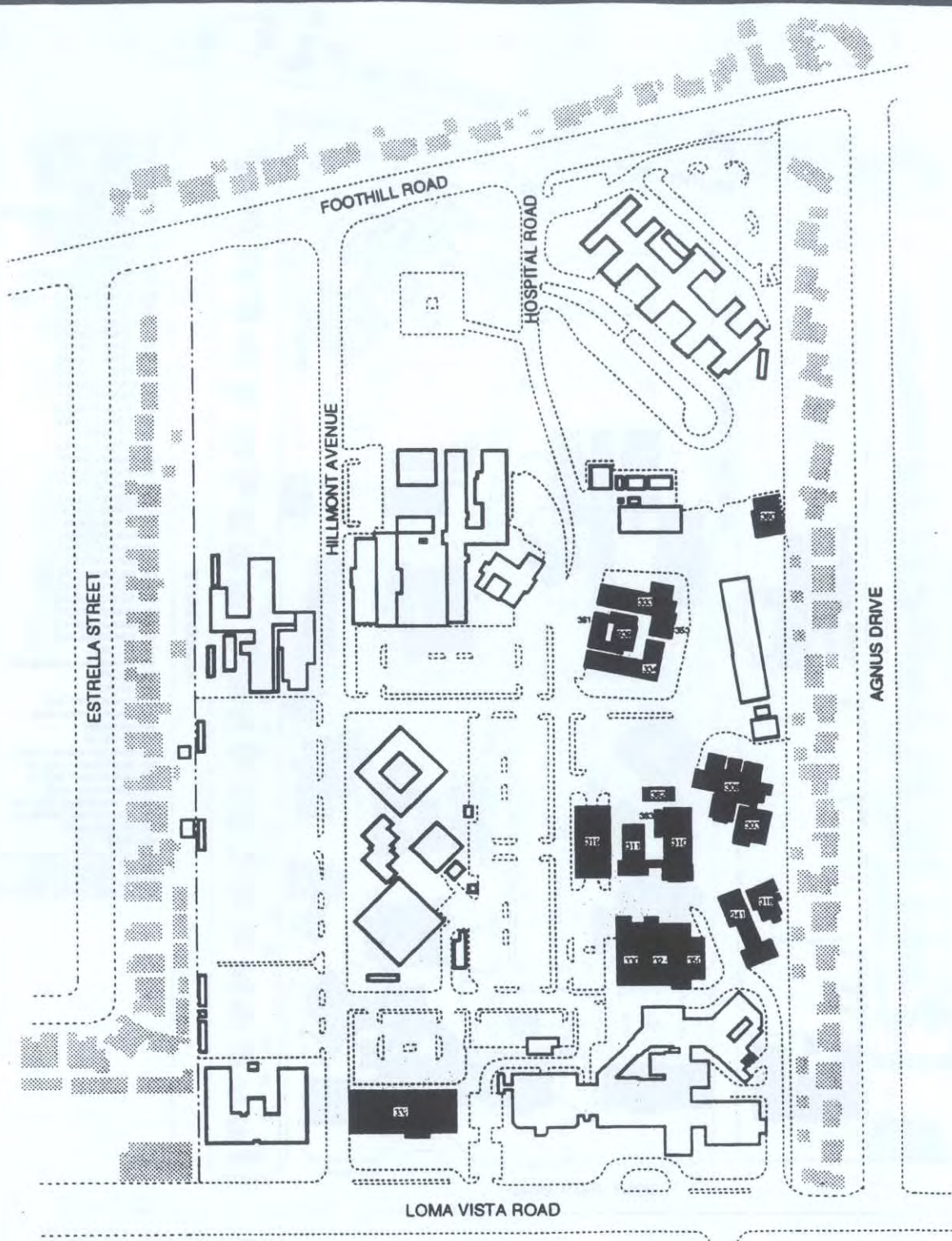
- 300 FAMILY CARE MODULE
- 304 HOSPITAL - FANER WING
- 305 HOSPITAL - MAIN BLDG.
- 306 HOSPITAL - OLD BLDG.
- 308 FAMILY CARE CENTER
- 309 BARDS BLDG.
- 310 WOMENS & CHILDRENS CLINIC
- 311 HIGHWAY DICHORY DOC
- 315 JUVENILE HALL INTAK
- 316 DATA PROCESSING
- 318 STOREROOM
- 320 MENTAL HEALTH SUBSTA
- 321 JUVENILE HALL
- 322 JUVENILE WORK FURLOUGH
- 323 JUVENILE SCHOOL
- 324 JUVENILE BOYS DORM
- 325 JUVENILE RESTROOM
- 326 JUVENILE COURT
- 327 KITCHEN & DINING
- 328 BOILER & LAUNDRY
- 330 BIO-MED MAINTENANCE
- 331 RESEARCH LAB
- 332 HCA BUSINESS OFF
- 333 CUSTOMAL SVCS
- 334 PLT. OPER.
- 335 PUBLIC HEALTH DEPT
- 336 PAINT STORAGE
- 337 GROUNDS STORAGE
- 338 PAINT SHOP
- 339 GROUNDS OFFICE
- 340 MENTAL HEALTH ADMIN.
- 341 M.H. IN-PATIENT
- 342 M.H. ADMISSION
- 343 M.H. MULTI-PURPOSE
- 344 M.H. MECH'L RM.
- 345 COLSTON YOUTH TRLR.
- 346 COLSTON YOUTH CTR.
- 347 PAINT SPRAY BOOTH
- 348 CARPENTER SHOP
- 349 2 - 1980 IOW EMER. GEN. HSE.
- 350 DISHWASH & CONF. RM.
- 352 M.H. TRLR.
- 353 WOMENS & CHILDRENS TRLR.
- 354 AUX. STRG.
- 355 AUX. STRG.
- 357 COLLECTIONS TRLR.
- 358 COLSTON YOUTH TRLR.
- 360 CORONERS
- 361 PHOTO LAB.
- 362 GENETICS PROGRAM TRLR.
- 363 HEALTH DEPT. TRLR. - S
- 364 HEALTH DEPT. TRLR. - N
- 365 HEALTH DEPT. SHED
- 366 2 - 1980 IOW EMER. GEN. HSE.
- 367 SUPPORT FACILITIES BLDG.
- 368 CAT SCAN BLDG.
- 308 BARDS TRLR.
- 329 HEALTH DEPT. STORAGE SHED
- 338 PLT. OPER. STOREROOM
- 340 COLSTON YOUTH MODULE
- 341 MEDICINE SPECIALTIES CENTER

- | | | | |
|--|----------------------------|--|-----------------------|
| | BARD BUILDING | | HOSPITAL |
| | FAMILY CARE COMPLEX | | JUVENILE COMPLEX |
| | HCA BUSINESS OFFICE (PSSA) | | MENTAL HEALTH COMPLEX |
| | PUBLIC HEALTH DEPARTMENT | | PLANT OPERATIONS |



**EXISTING
VCMC FACILITIES**

000315

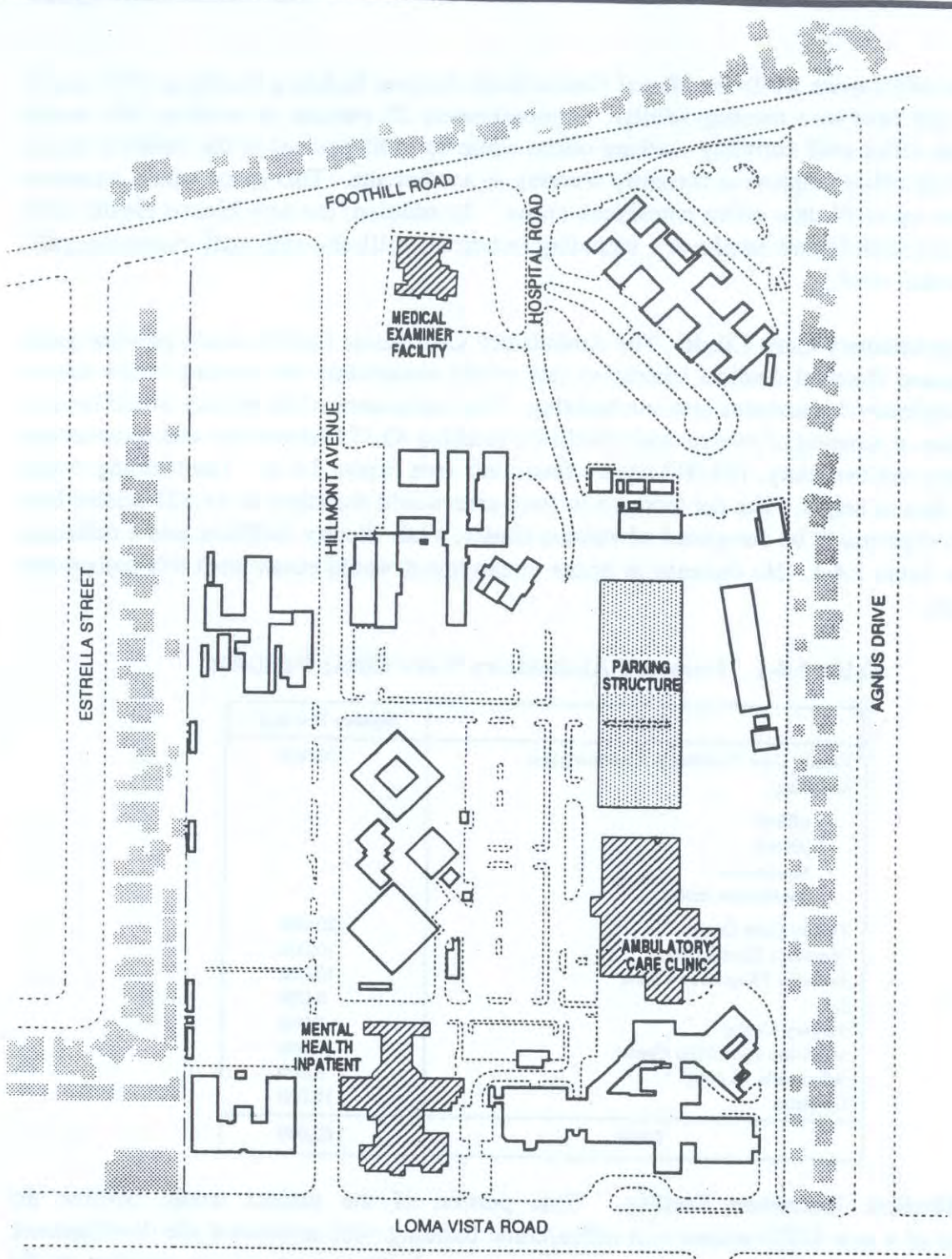


- 300 FAMILY CARE MODULE
- 308 FAMILY CARE CENTER
- 310 WOMENS & CHILDRENS CLINIC
- 311 HICORY DICHORY DOC
- 318 DATA PROCESSING
- 319 STOREROOM
- 327 KITCHEN & DINING
- 330 BIO-MED MAINTENANCE
- 332 HCA BUSINESS OFF
- 333 CUSTOOAL SVCS.
- 334 PLT. OPERS
- 350 DISHWASH & CONF. RM.
- 353 WOMENS & CHILDRENS TRLR.
- 360 CORONERS
- 361 PHOTO LAB
- 362 GENETICS PROGRAM TRLR.
- 363 HEALTH DEPT TRLR. - S
- 328 PLT. OPERS STOREROOM
- 341 MEDICAL SPECIALTIES CENTER



000316
313

**STRUCTURES
TO BE DEMOLISHED**



000317

PROPOSED
SITE PLAN

3.0 Project Description

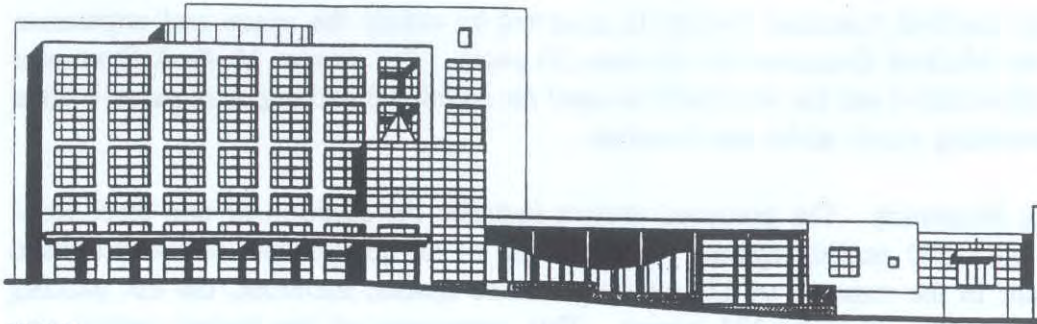
converted to office space while the Mental Health Multi-Purpose Building (Building 343) would be vacated and used as a meeting facility. Approximately 20 percent of building 341 would accommodate office staff currently working onsite while up to 80 percent of the building would be occupied by office employees currently working at another site. This space would therefore accommodate up to 34 new office employees onsite.¹ In addition, the new Mental Health Unit would accommodate 22 new employees, including an estimated 10-day-shift staff, 6 evening staff, and 6 night-shift staff.

Ambulatory Care Clinic. The Ambulatory Care Clinic (ACC) would provide space for the relocated Hospital medical laboratory and would consolidate the existing onsite clinics and cafeteria/dietary departments into one building. This component of the project would involve the demolition or removal of twelve onsite facilities totalling 43,475 square feet and construction of a five-story and two-story, 105,000-square-foot clinic (see Figure 3.4-3). The building would be up to 75 feet in height. The net increase in floor area would therefore be 61,525 square feet. The ACC is expected to be composed of various clinics, a lab, dietary facilities, and a cafeteria, as shown in Table 3.4-1. No increase in onsite employment would result from this component of the project.

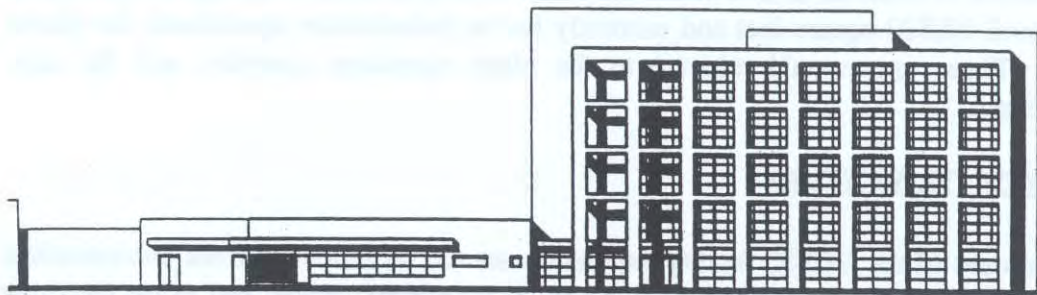
Table 3.4-1. Proposed Ambulatory Care Clinic Facilities

Unit	Square Footage
Family Care Residency Administration including:	20,000
• offices	
• library	
• auditorium	
• conference rooms	
Family Care Center	20,000
Women's Health Center	10,000
Pediatric Diagnostic Center	10,000
Lab	6,000
Surgery Center	3,000
Medicine Specialties Center	10,000
Admission - Lobby	8,000
Cafeteria	18,000
Total	105,000

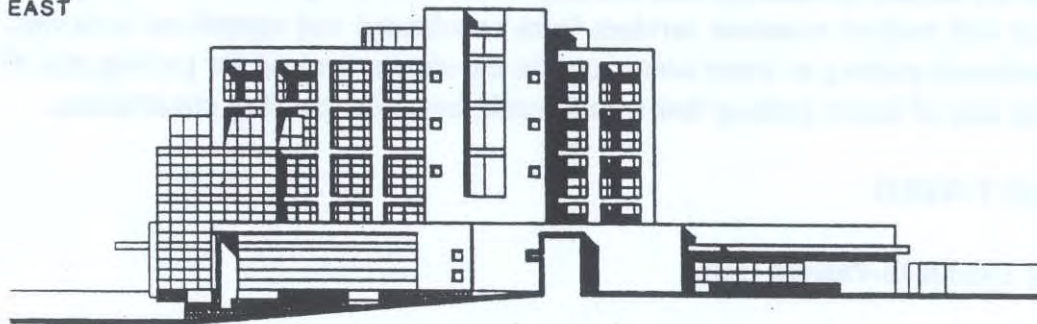
Medical Examiner Facility. This portion of the project would involve the construction of a new 8,000-square-foot office/clinic building with associated site development. The new building would integrate the currently separated offices and support services of the Ventura County Medical Examiner into a single facility located near the intersection of Hillmont Avenue and Foothill Road. The project would house offices and associated facilities for three doctors, eight investigators, two secretaries, and an autopsy assistant, as well as an autopsy room, a morgue, a laboratory, storage spaces, and related public areas. No increase in onsite employment would occur as a result of this component of the project.



WEST



EAST



SOUTH



NORTH

SOURCE: Rasmussen & Associates

**AMBULATORY CARE CLINIC
ELEVATIONS
000319**

3.0 Project Description

The new medical examiner facility is expected to satisfy the space and expansion requirements of the Medical Examiner for the next 30 years. The current Medical Examiner facility would be demolished and the site would be used for additional parking or as passive open space, possibly including picnic tables and benches.

Parking Structure. The proposed project includes the addition of one three-level parking structure with 500 parking spaces. Construction of all components of the proposed project would result in the removal of 229 existing surface spaces; therefore, the net parking space increase on the site would be 271 spaces. This component of the project would also involve the demolition or removal of five onsite facilities housed in three buildings and a trailer. These structures total 10,810 square feet and currently house maintenance operations, the photo lab, and offices. These uses would relocate to the plant operations complex and the new ambulatory care clinic.

3.5 PROJECT OBJECTIVES

The purposes of the VCMC facility expansion are to: 1) relieve current overcrowded conditions in the Mental Health In-Patient Unit, Medical Examiners Office, and other facilities on the campus that are housed in buildings that, in many cases, were designed for other purposes; 2) provide medical and medical examiner services from coordinated and centralized locations; and 3) provide additional parking to better accommodate the current demand for parking and to compensate for the loss of onsite parking that would result from new building construction.

3.6 PROJECT NEED

3.6.1 Mental Health In-Patient Unit

The Mental Health In-Patient Unit is currently operating at or above its design capacity of 28 beds. The facility averaged 29.5 patients daily in 1992, with a peak one day load of 40 patients.² Project implementation would add 15 beds to the facility, increasing capacity to a total of 43 beds and relieving overcrowded conditions. The facility currently used to house and treat patients was designed as an open unit psychiatric hospital for voluntary patients. The current and future need is for a locked unit to treat involuntary patients. The current facility standards for fire, safety, and patient treatment and security cannot be incorporated into the existing facility. In addition, project implementation would consolidate the Mental Health Unit's Crisis Services team, which is currently located in a separate building. The Mental Health In-Patient Unit expansion project would improve the capacity capabilities of the County's Mental Health Services, improve the patient security, and provide a more efficient and effective delivery of health services. The project's location would maintain the unique and distinctive character of this health care profession, yet provide immediate access between the hospital emergency room and the mental health in-patient facilities. The project would also allow the retention of some of the existing Mental Health Services facilities which support the administrative, reception, training, and educational functions of the Mental Health Services staff.

3.0 Project Description

3.6.2 Ambulatory Care Clinic

Ambulatory care services at the VCMC are currently provided by a number of separate clinics dispersed in several buildings/trailers throughout the campus. These buildings and trailers are in most cases very old and are difficult to maintain, inefficient in layout, separate from one another and the hospital, seismically unsafe, and inefficient in utilities consumption. Project implementation would consolidate these clinics into one facility that would provide a variety of care services to patients. The goal of the County Health Care Agency is to improve the efficiency and effectiveness of health care services. In consolidating the clinics under one building, the proposed ACC would optimize the use of staff, operation and maintenance funds, and maximize the synergistic effects of specialized clinics and medical staff in close proximity to one another. It is further intended that the project reinforce the concept of providing specialized out-patient care at a central location in the County while at the same time the Health Care Agency begins to expand the County's capability to provide primary care by the establishment of satellite clinics throughout the County. The ACC location immediately adjacent to the hospital would also provide quick access to the medical laboratory, dietary services, and cafeteria to support the hospital as well as immediate access for patients at the ACC who need more specialized treatment from the hospital.

3.6.3 Medical Examiner Facility

The existing Medical Examiner facilities on campus are also currently separated between two areas; the examination and storage facilities are operated in the VCMC hospital morgue, while the Medical Examiner office is located in a temporary building on the eastern border of the campus (Building 360). Operational and aesthetic conflicts occur related to corpse storage, transfer, and autopsy examination due to the location of the examination and storage facilities within the hospital morgue.³ In addition, the separation of these facilities from the Medical Examiner office results in administrative difficulties. Project implementation would consolidate the Medical Examiner facilities in a building completely separated from the hospital facility, thereby providing more efficient service and alleviating aesthetic conflicts. The project would also give needed additional storage space for cadavers, body tissue samples, evidence, and records.

3.6.4 Parking Structure

A parking study prepared in August 1992 determined an existing need for 205 additional parking spaces at the VCMC based on: 1) current onsite parking usage; and 2) movement of VCMC campus patrons from off-campus street parking spaces into on-campus parking areas. This need was verified by a subsequent re-examination of VCMC parking needs (see Appendix 5.3). In addition, project implementation would create demand for an estimated 66 additional parking spaces.

To relieve current overcrowded parking conditions and to accommodate additional parking needs generated by the Mental Health In-Patient Unit expansion, project implementation

3.0 Project Description

would increase onsite parking by 271 spaces. The Parking Structure would not only provide consolidated parking to satisfy the current parking demand and that generated as a result of minor increases in on-campus staff population, it would replace parking spaces lost to the construction of the ACC and Mental Health Unit. By consolidating much of the campus parking capability in one structure, it would reduce the time to locate parking, reduce the customer walking time from previously dispersed parking lots, provide for more effective use of land, and reduce the traffic criss-crossing the campus to parking lots.

3.7 PROJECT DESIGN FEATURES

Project design will incorporate the following features designed to reduce potential environmental impacts associated with the project. The features, which were identified in the Initial Study for the proposed project, are organized according to the area of potential impact addressed.

Air Quality

- Regular ground wetting of graded areas will be conducted during construction to control fugitive dust emissions.
- Grading activities will cease during periods when winds exceed 20 miles per hour averaged over one hour.
- Materials excavated, stockpiled, and transported during construction will be wetted regularly.
- Onsite construction vehicle speeds will be limited to 15 miles per hour.
- Construction vehicle traffic areas will be regularly wetted.
- Tarping of trucks removing dirt offsite.

Water Resources

- Slope erosion control measures such as jute matting, silt fences along slope toes, and straw bales will be utilized to control runoff during project construction.

Visual Resources

- Landscaping materials around the Medical Examiner facility will not include trees or shrubs that will ultimately exceed the height of the building, so as not to obstruct distant views.

3.0 Project Description

- Removal of VCMC buildings immediately adjacent to the VCMC eastern boundary wall, and installation of a landscaped buffer 75-150 feet in width between the ACC or parking structure and adjacent residences to the east in conjunction with the ACC and parking structure.
- The Medical Examiner building will be a single story, and building elevations will be stepped to ensure compatibility with surrounding topography and natural slope lines.
- All mechanical operational units for the Medical Examiner facility will be entirely screened from view of the entire Foothill Road view corridor.

Seismic Hazards

- The proposed Medical Examiner facility is within the Alquist-Priolo Special Studies Zone and will be built in accordance with recommendations contained in the Leighton and Associates Geotechnical Report for the Medical Examiner Facility (September 1992) and the Staal, Gardner & Dunne Geological (Fault Hazard) Report for the Medical Examiner Facility (January 1992).
- The proposed parking structure is within an Alquist-Priolo Special Studies Zone, and will be built in accordance with recommendations to be contained in a geotechnical report as part of project design.

Geologic Hazards

- Project implementation will be in accordance with standard geotechnical practices and construction of the Medical Examiner facility will comply with recommendations regarding excavation and compaction in the 1992 Leighton & Associates geotechnical study of that facility and recommendations from the 1992 Geologic (Fault Hazard) Study by Staal, Gardner & Dunne.

Hydraulic Hazards

- Project implementation will include revegetation of all constructed slopes and graded areas as soon as feasible following construction. Such revegetation will minimize the potential for long-term sediment transport from the project site.

Noise and Vibration

- Construction activities will conform with standard noise reduction procedures, including limiting construction activity to between 8 a.m. and 5 p.m. Monday through Friday and, when feasible, the use of temporary, movable construction noise barriers to shield sensitive receptors.

3.0 Project Description

- To reduce noise levels at the Mental Health In-Patient Unit's sensitive uses (in-patient quarters), patient rooms and most exterior use areas will be sited to rear of the Mental Health Unit, away from Loma Vista Road. This will allow the structure to act as a noise attenuation device, shielding patient rooms and most outdoor use areas from excessive vehicle-generated noise.
- Specialty wall and glazing materials will be used for construction of the Mental Health In-Patient Unit.
- A 10-foot wall will be constructed along exterior use areas at the front of the Mental Health In-Patient Unit along Loma Vista Road, thus attenuating noise levels at exterior use areas in the front of the facility.
- All paving within the proposed parking structure and on all external ramps will be Portland Cement Concrete with a non-squeal finish.

Light and Glare

- Lighting sources will be shielded and projected toward the ground to decrease the quantity of light radiated into the nighttime sky.
- The proposed project will maximize the use of non-reflective exterior materials in its construction.

Water Supply

- A sufficient number of toilets will be retrofitted to achieve the 3:1 water consumption offset requirements of City of Ventura Resolution No. 92-73.
- Low flow shower heads (2.5 gallons per minute or less at 40 psi) will be installed on all new construction.
- Sink and lavatory faucets which limit the flow of water to a maximum of 2.5 gallons per minute at 40 psi, will be installed on all new construction.
- New landscaping developed on the subject site in conjunction with the proposed project will be drought tolerant.
- Drip, mini-emitter or low volume sprinkler irrigation systems will be used for all new landscaping developed in conjunction with the proposed project.

3.0 Project Description

Waste Treatment/Disposal

- The VCMC will mulch grass clippings rather than disposing of them. If existing VCMC equipment will not mulch the clippings, one or more mulching lawn mowers will be purchased by the VCMC. In addition, a "green bin" recycling program will be initiated to handle yard wastes other than grass clippings.
- The VCMC will develop an onsite or offsite composting program for organic compostable wastes generated on the VCMC campus.
- Adequate space for waste and recycling bins, as determined by the Ventura County Solid Waste Management Department, will be provided for all new facilities developed as part of the proposed project.
- The VCMC will purchase a baler or develop an alternative method to break down cardboard boxes and reduce the space requirements for recyclable materials bins.
- The contractor that conducts project-related construction and demolition activities will be required to develop County-approved plans for the diversion of construction/demolition wastes through source reduction or recycling.

¹ This assumes one employee per 250 square feet in the 8,451 square feet that would be occupied by employees from offsite.

² Essex, Duane, Ventura County Mental Health Center, 1992.

³ O'Halloran, Ronald L., Chief Medical Examiner, 1992.

- The VCC will include data regarding water flow direction, flow velocity, and water quality. The VCC equipment will not include the electrical and control systems that are required for the VCC. It is noted that the VCC equipment will be located in the field and will be subject to weather conditions.
- The VCC will develop an initial design and construction plan for the VCC. The VCC will develop an initial design and construction plan for the VCC. The VCC will develop an initial design and construction plan for the VCC.
- Additional work for water flow direction and velocity will be provided for all new VCC equipment. The VCC will develop an initial design and construction plan for the VCC. The VCC will develop an initial design and construction plan for the VCC.
- The VCC will provide a list of equipment to be used in the VCC. The VCC will provide a list of equipment to be used in the VCC. The VCC will provide a list of equipment to be used in the VCC.
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4.0 ENVIRONMENTAL SETTING

This section provides a general description of the existing environmental conditions in the City of Ventura, as well as a description of the local setting in which the project site is located.

4.1 REGIONAL SETTING

The City of Ventura is located in western Ventura County, California, approximately 60 miles northwest of downtown Los Angeles. As of January 1, 1993, the City's population was 96,112, up 1.4 percent from the January 1, 1992, population of 94,756. The City's population represents approximately 14 percent of the countywide population of 700,087.¹

Regional access to the City is provided by a system of freeways and highways, and by railroad. The Ventura Freeway (U.S. Highway 101) provides a link from Los Angeles to Santa Barbara and San Francisco to the north. The Santa Paula Freeway (State Route 126) extends to the northeast to Santa Paula and beyond, eventually intersecting the Interstate 5 at Castaic Junction. Access to Ojai and recreational areas in the Los Padres National Forest and to other areas to the north is provided by State Route 33. Amtrak provides passenger rail service to the City at its station in downtown Ventura.

The City is situated on a coastal plain between the Santa Clara and Ventura Rivers. Elevations on the plain range from sea level along the coast to approximately 850 feet in the foothills located north of the City. Drainage of the coastal plain is primarily through natural watercourses which terminate in the Santa Clara River, the Ventura River, or the Pacific Ocean.

Ventura is located in the western portion of the Oxnard Plain Airshed. The City's climate is characterized by cool winters and warm, dry summers tempered by cooling sea breezes. Average annual precipitation in the City ranges from 14 inches along the coast to 15.5 inches near Saticoy. Precipitation occurs primarily during the winter months, with approximately 95 percent of annual rainfall occurring from November through April. Air quality in the City is generally good, with air pollutant levels rarely exceeding state or federal standards.

The City lies within a seismically active region of Southern California. Portions of the City are subject to such geologic hazards as fault displacement, earthquakes and groundshaking, landslides, liquefaction, and flooding.

4.2 SITE-SPECIFIC SETTING

The VCMC campus is located between Loma Vista and Foothill Roads, approximately two miles east of downtown Ventura. The project site is in the Loma Vista community of the City, which is characterized by a large concentration of regional medical facilities and related professional offices along Loma Vista Road. In the areas immediately bordering the Loma Vista Road corridor, a number of residential structures have been converted to small-scale offices.

4.0 Environmental Setting

Hillside areas to the west, north, and east of the site are characterized by a mix of low and high density residential uses.

The project site is located at the base of the Ventura foothills, which provide a scenic backdrop to the City. Some residential development extends onto the flanks of the hills above the VCMC campus, affording panoramic views of the central portion of the City, the Pacific Ocean, and the Channel Islands.

The VCMC Campus is developed with various County-owned buildings, including medical offices and juvenile corrections facilities. The northern half of the campus, which currently consists primarily of grass fields and wooded areas, slopes from north to south and east to west. The southern half of the campus, which contains most of the onsite development, is relatively flat. The overall differential in elevation on the site is approximately 120 feet, from a high of 260 feet at the northeast edge of the campus to a low of approximately 140 feet at the southwest corner of the campus. Onsite surface sheet flow is currently routed to Loma Vista Road via Hillmont Avenue.

The Ventura fault runs through the northern third of the VCMC campus in an east-west direction. Consequently, the sites of the Medical Examiner Facility and the parking structure may be subject to fault rupture in the event of seismic activity along the Ventura fault.

¹ California Department of Finance, Price and Population Data for Local Jurisdictions, April 30, 1993.

5.0 ENVIRONMENTAL IMPACT ANALYSIS

This section of the report examines the environmental issues that will or may have an impact on the environment, as identified in the Initial Study and in the oral and written responses received as a result of the Notice of Preparation. Each issue subsection contains four discussions. The "Setting" discussion describes the existing environmental and/or regulatory structure affecting the project site. The "Impact Analysis" discussion evaluates the impacts of the proposed project on the existing physical and regulatory environment. The "Mitigation Measures" discussion proposes actions which would lessen or eliminate the impacts identified in the "Impact Analysis" discussion. The "Residual Impacts" discussion discloses the level of impact that would still remain as a result of the implementation of the proposed project subsequent to implementation of the recommended mitigation measures.

5.1 LAND USE

By adding structures of greater height and scale than many of those that currently exist on the VCMC campus, project implementation has a potential to impact land use. This section analyzes the proposed project's consistency with adopted City of Ventura land use policies, as well as compatibility with surrounding uses.

5.1.1 Setting

5.1.1.1 Existing Conditions

a. **VCMC Campus.** The project site is currently developed with 60 structures totalling 398,157 square feet of floor area. Although medical facilities are the primary use on the site, the campus also contains administrative functions and juvenile corrections facilities.

Existing VCMC facilities are shown in Figure 3.3-1 of the Project Description. As that figure illustrates, uses fronting Loma Vista Road include public health and administrative functions, as well as the VCMC Hospital. The Public Health Department, located west of Hillmont Avenue, is a one-story U-shaped structure while the PSSA Building, which is located immediately east of Hillmont Avenue and houses administrative offices, is a two-story structure. The VCMC Hospital, immediately east of the PSSA Building, measures 178,995 square feet and rises up to four floors.

In the central and eastern portions of the campus are several single-story structures and trailers which house the mental health complex, the family care complex, and plant operations. The mental health complex is located along the eastern edge of Hillmont Avenue and consists of a mental health in-patient unit, as well as associated administrative functions. The family care complex, located just north of the hospital on the site's eastern edge, houses various out-patient medical clinics. Plant operations consist of structures and trailers north of the family care complex, as well as a boiler and laundry building and an emergency generator building located on the eastern edge of the site.

5.1 Land Use

The northwestern portion of the campus houses juvenile corrections complex. This complex includes Juvenile Hall on the east side of Hillmont Avenue and the Colston Youth Center on the west side of Hillmont. Correctional facilities consist of a number of one-story structures which contain dormitories, dining facilities, and correctional schools. The Colston Youth Center grounds are completely surrounded by a 10-foot security wire fence for security purposes.

In the northeast corner of the site is the Bard Building. This one-story building fronts Foothill Road and houses mental health out-patient services and associated administrative functions.

b. Surrounding Community. Land uses in the vicinity of the VCMC campus consist primarily of single-family residences to the north and east, single- and multi-family residences to the west, and medical/commercial offices, a church, and a private elementary school to the south across Loma Vista Road (see Figure 5.1-1). Land uses to the north of the site along Foothill Road and to the south along Loma Vista Road are illustrated in Figure 5.1-2. Onsite buildings are generally consistent in use, scale, and height with adjacent commercial and medical office buildings along Loma Vista Road. The one-story structures along the western and northern edges of the campus have not caused any compatibility conflicts with adjacent residential uses. However, certain campus structures, notably the Hospital and the emergency generator, have caused compatibility issues with the single-family residences to the east along Agnus Drive.

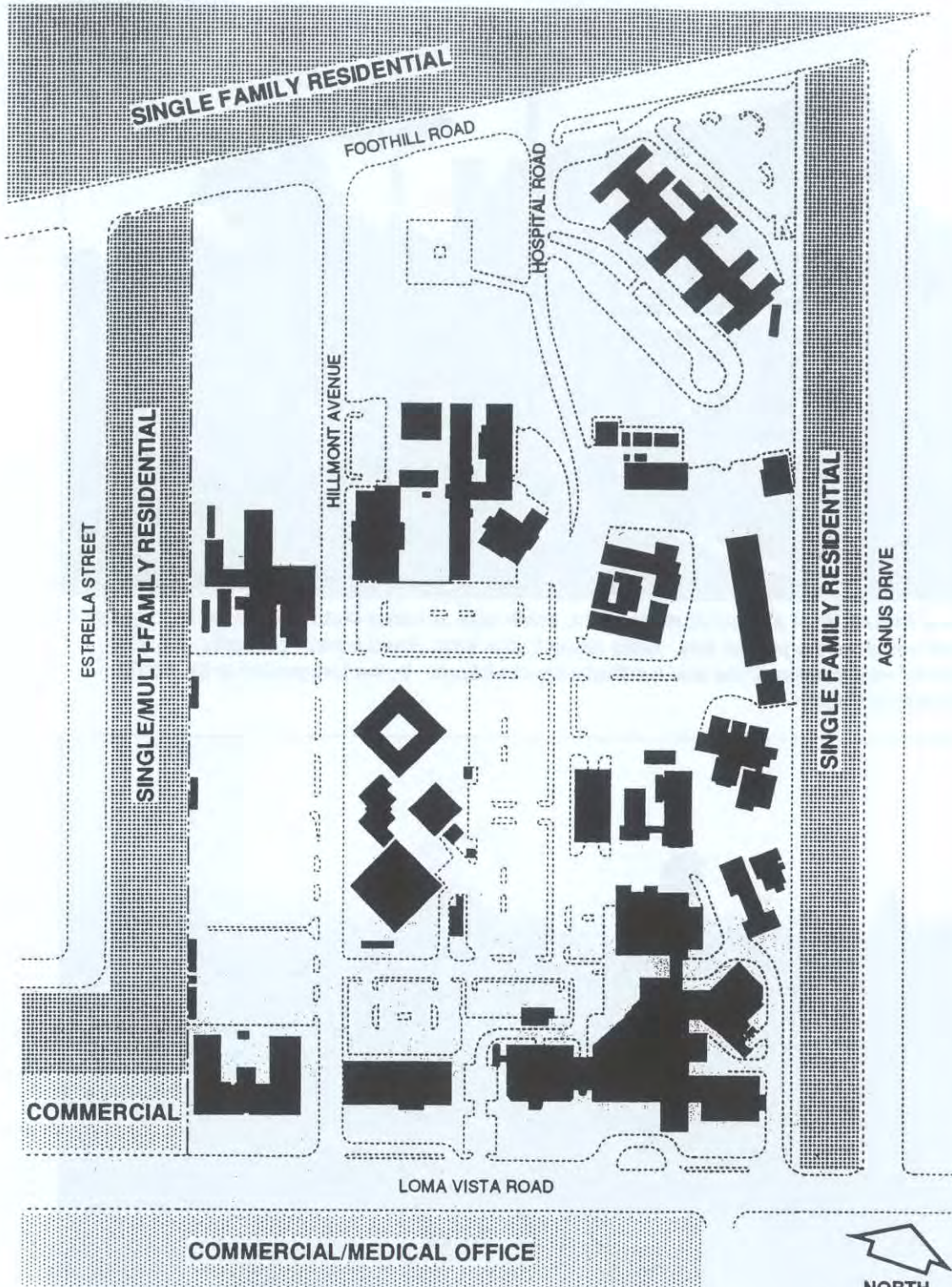
The four-story Hospital is substantially greater in scale and height than the single-family homes abutting the campus near the northeast corner of the Agnus Drive/Loma Vista Road intersection. In the past, Agnus Drive residents have expressed concern about light and glare impacts, noise, loss of privacy, and walk-through traffic associated with VCMC employees and patrons who park on Agnus Drive.

The emergency generator was constructed on the site in 1985 and has been a source of concern to adjacent residents along Agnus Drive since that time. When operating (approximately 1-2 times per month), the generator emits smoke which, because of prevailing westerly winds, sometimes blows into the yards of adjacent residences to the east along Agnus Drive. Emissions from the boiler have become a source of annoyance, as well as a potential health concern, to some Agnus Drive residents. Air quality issues related to boiler emissions are discussed in Section 5.4, Air Quality.

5.1.1.2 Regulatory Setting

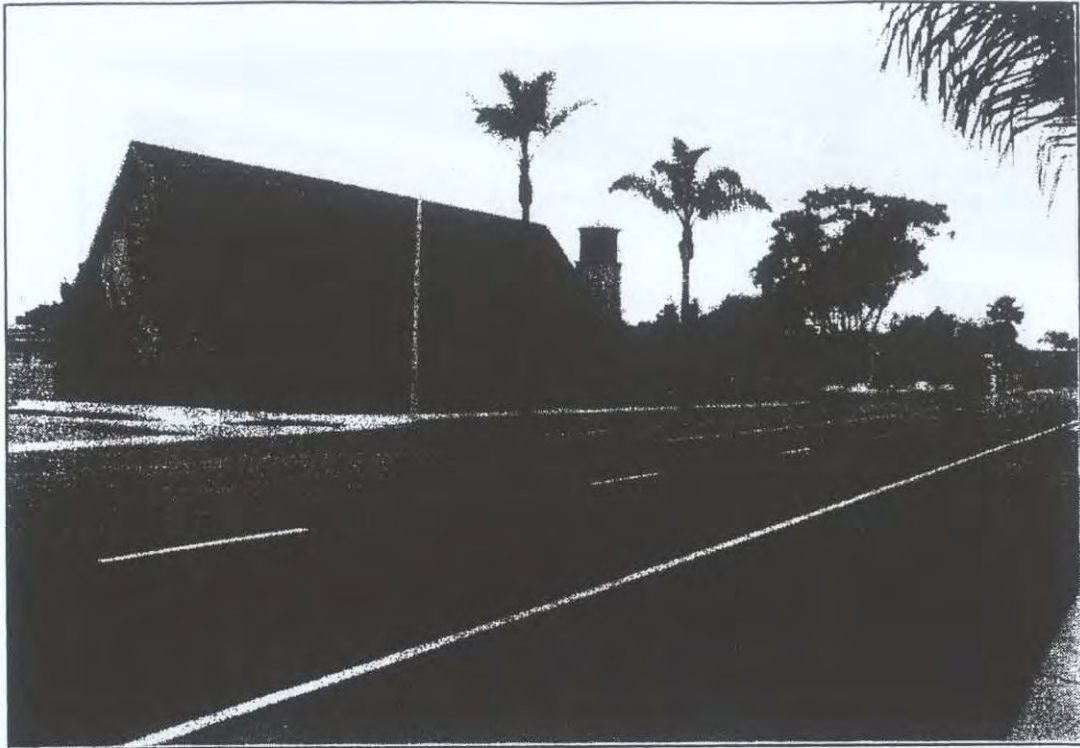
Although the County-owned VCMC site is not subject to City of Ventura land use policies, the site does lie within the normal jurisdictional boundaries of the City and the City has defined land use and zoning designations for the site. These City policies are discussed below.

a. Comprehensive Plan Land Use. The City of Ventura Comprehensive Plan designates the VCMC site as "Existing Urban." This land use designation applies to lands that



PROJECT VICINITY
LAND USES

000331



View looking west at land uses along the south side of Loma Vista Road from the south-east corner of the project site. Uses along Loma Vista Road consist primarily of one and two-story commercial and medical office buildings. In the foreground is St. Paul's Episcopal Church.



View of land uses north of the project site along the north side of Foothill Road. As the photo shows, uses along Foothill Road consist primarily of single-family residences.

ADJACENT LAND USES

000332

5.1 Land Use

are already developed with an appropriate use and/or are an integral part of the City's urban form. The allowable future land uses in areas designated Existing Urban are based upon the underlying zoning, or as set forth in the Intent and Rationale Statement for each community in the City.

b. Zoning. The project site is within the Hospital (H) Zone of the City's September 1992 Zoning Ordinance. Uses allowed in the H Zone include government, medical, recreation, and recycling services, as well as parking. Uses permitted subject to approval of a Use Permit include community meeting facilities, day care centers, group care, utility or equipment substations, and helicopter landing, safety, and transportation services. Development of sites in the H Zone is subject to a Planned Development Permit if developed under City jurisdiction.

Buildings and other structures in the H Zone are restricted to three stories in height. In addition, regardless of the number of stories, no structure within the H Zone is allowed to exceed 45 feet in height. It should, however, be noted that at least two sites within the H Zone (the VCMC and Community Memorial Hospital) include buildings that exceed the zone's height restrictions.

Front setbacks in the H Zone are to be at least 20 percent of the lot depth, but need not exceed 20 feet. Side setbacks are to be at least 10 percent of the lot width. They should be a minimum of 3 feet but need not be greater than 5 feet. Rear setbacks are to be a minimum of 25 feet.

5.1.2 Impact Analysis

5.1.2.1 Methodology and Significance Threshold

Land use impacts are analyzed on the basis of two factors: 1) compatibility of proposed development with surrounding uses, and 2) consistency with adopted City of Ventura land use policies. Impacts are considered significant if proposed development on the project site would be incompatible with surrounding land uses.

5.1.2.2 Project Impacts

a. Compatibility with Surrounding Uses. The VCMC campus currently houses a variety of medical facilities while the proposed project would continue similar use of the land on the site. The purpose of the project is to consolidate currently dispersed onsite offices and support services, as well as satisfy future space and expansion requirements. Consequently, the structures proposed as part of the project would be consistent with the current use of the VCMC campus.

The proposed development would generally be consistent with the commercial and medical uses to the south across Loma Vista Road. The one-story Mental Health In-Patient Unit, which would front Loma Vista Road, would also be consistent with the scale of uses across

5.1 Land Use

Loma Vista. Although the proposed ACC and parking structure would both be larger in scale than uses across Loma Vista Road, they would be similar to the scale of the existing VCMC Hospital. Because these structures would be located behind the Hospital and would not directly front Loma Vista Road, their scale and height would not pose any compatibility problems for uses along Loma Vista.

The uses that currently exist on the VCMC site generate relatively large volumes of traffic, as well as associated air pollutant emissions and noise. Consequently, onsite uses may be considered incompatible with residential uses to the west, north, and east. Project implementation would continue the use of the site for medical offices and would therefore continue this potential incompatibility. Nevertheless, because the project would merely continue an existing condition rather than creating a new compatibility conflict, this impact is considered less than significant.

The ACC would be approximately 140 feet west of residential properties directly abutting the VCMC site along Agnus Drive and the proposed parking structure would be approximately 150 feet from Agnus Drive properties. At five and three stories, respectively, these structures would exceed the height of the one-story structures and surface parking that they would replace, and of the adjacent Agnus Drive residences, by from two to four stories. As such, these two structures would intensify the urban nature of the campus. It should be noted, however, that the building site coverage on the campus will be reduced to some degree through the consolidation of several one-story buildings and surface parking into a multi-level building and parking structure.

This height issue is minimized in the case of the proposed parking structure by slope characteristics of the site. The foundation elevation of the three-story structure is approximately 169 feet at site of the proposed parking structure, whereas the foundation elevation of the adjacent single-family residential structures immediately east of the proposed structure ranges from 184 feet at the south end to 190 feet at the north end. The result would be a structure reaching 193 feet in elevation, a range of between 9 to 3 feet higher than the ground level of the residences from south to north. In addition, the structure would generally be hidden from view for these residences by the existing boiler and laundry building (for further discussion, please see Section 5.2, Aesthetics/Shadow/Light and Glare). Thus, the compatibility impacts associated with the proposed parking structure are considered less than significant.

Although the ground floor elevation of the ACC building pad is about 10 to 24 feet below that of Agnus Drive residences immediately to the east, the five-story, 75-foot structure would appear substantially taller than existing onsite buildings (other than the existing hospital) and would be clearly visible from some Agnus Drive residences. The setback of onsite structures from Agnus Drive residential properties would be greater following project implementation than currently exists due to the demolition of structures directly abutting Agnus Drive properties. The removal of these structures would represent a beneficial land use compatibility impact. Nevertheless, the intensification of land use and increase in building height by a factor of 5, combined with increased massing associated with the proposed ACC would increase the current

5.1 Land Use

scale compatibility issue with existing buildings and create potentially significant scale compatibility conflicts with Agnus Drive residences.

b. **Consistency with Adopted Land Use Policies.** The proposed ACC, Mental Health In-Patient Unit, Medical Examiner facility, and parking structure are all uses which would be allowed under both the City of Ventura's "Existing Urban" General Plan land use designation and the H Zone. Consequently, the proposed expansion would create no consistency conflicts in terms of land use type.

At one story each, neither the Mental Health In-Patient Unit and the Medical Examiner facility would exceed the City's height limits for the H Zone. No part of the proposed parking structure would exceed either the three-story nor the 45-foot maximum height limitation. Consequently, the structure would be considered consistent with H Zone height limitations. The five-story ACC would, however, exceed the 45-foot (three-story) height limitation for structures in the H Zone. Consequently, this component of the project would be inconsistent with current City building height policy. Although the County-owned project site is not subject to City land use policies, the proposed project would be inconsistent with the height restrictions in this zoning designation.

All components of the proposed project would be consistent with the H Zone's side and rear setback requirements. However, the Mental Health In-Patient Unit Wall that would front Loma Vista Road would not be set back the 20 feet required for a lot the depth of the VCMC campus under the H Zone. Although the County-owned site is not subject to City land use policies, this component of the project would be inconsistent with the City's setback requirements.

5.1.2.3 Cumulative Impacts

Project implementation would contribute to a general trend toward more intensive land use that is occurring throughout the City of Ventura. As an example, the Community Memorial Hospital recently expanded its facilities with a medical office tower and a parking structure two blocks west of the VCMC campus. Operators of the Buenaventura Mall have proposed an increase of approximately 450,000 square feet of retail space two blocks south of the VCMC campus. The land areas affected by the proposed project would not be directly affected by these or other currently proposed projects and no direct significant cumulative impact would occur. Nevertheless, the proposed project in combination with the mall expansion project proposal will contribute to an intensification of urban uses in the eastern portion of the Midtown area of Ventura.

5.1.3 Mitigation Measures

The project includes a number of design features to reduce land use impacts related to visual resources, air quality, and noise (see Section 3.7, Project Design Features). In addition, mitigation measures to reduce land use impacts related to aesthetics, increased traffic, air

pollutant emissions, and noise are recommended in Sections 5.2.3, 5.3.3, 5.4.3, and 5.5.3, respectively. Outside of reducing the height of the proposed ACC, an option analyzed in Section 7.0, Alternatives, no measures are available to mitigate impacts related to scale incompatibilities with adjacent residences along Agnus Drive or potential inconsistencies with established City of Ventura zoning regulations.

5.1.4 Residual Impacts

Mitigation measures recommended in Sections 5.2.3, 5.3.3, 5.4.3, and 5.5.3 would reduce land use compatibility conflicts related to aesthetic impacts to Agnus Drive residences, traffic, air pollutant emissions, and noise to less than significant levels. However, impacts related to the incompatibility of the scale of the proposed ACC would remain significant without a reduction in the height of the structure. In addition, the proposed ACC would remain inconsistent with the height limitation in the City of Ventura's H Zone.

5.2 AESTHETICS/SHADOWS/LIGHT AND GLARE

The assessment of aesthetic impacts, while being inherently subjective, can be based upon three fundamental criteria: the visual sensitivity of the site (visibility and level of concern of viewers for aesthetic quality); the scenic variety (physical attributes of a site which give it visual interest); and the visual condition (compatibility of the site's characteristics with that of its surroundings) (see Appendix 5.2 for additional detail). This section provides an evaluation and description of the aesthetic, shadowing, light and glare conditions associated with the site under pre- and post-project conditions.

5.2.1 Setting

5.2.1.1 Aesthetics

The proposed project site is located entirely within the existing VCMC campus which encompasses approximately 40 acres. In total, 60 structures, grouped into eight complexes, occupy the site (Figure 3.3-1). Much of the project site area, which is not occupied by structures, is paved with asphalt and concrete for use on public roads (Hillmont Avenue), internal roads, surface parking, and sidewalks. Landscaping is located around most onsite structures, most notably surrounding the facilities fronting Loma Vista Road and the existing Mental Health Complex. Additionally, approximately 4 acres of the site, immediately south of Foothill Road is currently undeveloped. Landscaping in this area includes trees bordering Foothill Road.

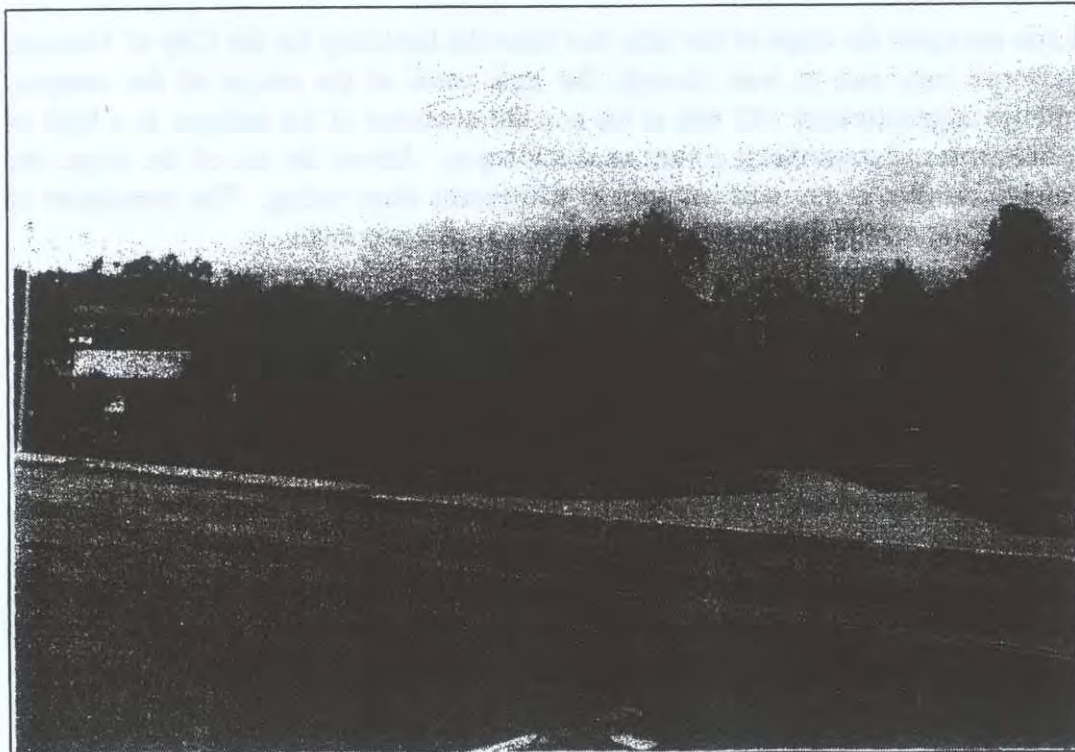
The site occupies the slope of the hills that form the backdrop for the City of Ventura. The toe of the slope runs east to west through the area north of the center of the campus. Elevation rises from approximately 140 feet at the southwest corner of the campus to a high of approximately 260 feet at the northeast corner of the campus. Above the toe of the slope, the northern part of the campus reaches approximately 25 percent slope rating. The remainder of the site exhibits relatively level terrain with a typical slope of 4 percent.

Existing structures range from one to four stories in height. The tallest and most massive structure is the VCMC Hospital (Hospital). Parts of the Hospital, which fronts Loma Vista Road, rise to four stories at a maximum height of approximately 60 feet above the finished floor elevation. The Mental Health Complex and PSSA building are two stories while most of the remaining buildings are one. The architectural style of most of the structures varies according to the age of the structure; buildings on the campus are generally not coordinated in style. Most of the campus' buildings represent variations of the post-World War II international style, characterized by simple rectilinear lines, large areas of glazing, little or no architectural decoration, and a "function over form" aesthetic philosophy. All of the structures feature rectangular or square windows and doors without detailed treatments.

The typical surface material used for onsite structures is poured concrete or stucco. Exterior paint color is generally a shade of gray, including dark gray for the Hospital. Figure 5.2-1 includes photos that illustrate the architecture of select buildings on the campus (a



A. View of existing hospital from Loma Vista Road looking north.



B. View of existing mental health complex from Hillmont Avenue looking northeast.

5.2 Aesthetics/Shadows/Light and Glare

view orientation map for this and subsequent photographs is included in Appendix 5.2). There are also several prefabricated structures.

The urban character of the VCMC site within the city of Ventura is distinctive in several ways. The site exhibits a campus quality, with multiple parking areas, a haphazard internal circulation functionality, and a substantial use of landscaping and plaza areas. Several landmark-quality trees live on the campus, especially in the southern and eastern parts near the Hospital and associated structures. Though the architecture is not distinctive, the Hospital is among the city's larger structures. Together with Community Memorial Hospital a few blocks to the west and the strip of medical office buildings lining Loma Vista Road, the campus is a part of a medical district within Ventura. Some of the numerous trees on the campus, notably surrounding the Hospital, reach 60 feet and higher.

The project site is readily viewed from a number of nearby public rights-of-way and surrounding nearby properties. The site can be clearly seen from areas north of Foothill Road due to the higher elevation. The primary view corridor to the north is Foothill Road. Figure 5.2-2 includes a view of the project site from Whitecap Drive, north of the campus. The campus can also be seen from Hillmont Drive. Land uses surrounding the campus include: single-family residences to the east (along Agnus Drive), single- and multi-family residences to the west (along Estrella Street) and north (along and above Foothill Road); and institutional (religious) and office/commercial uses to the south across Loma Vista Road. Figure 5.2-2 includes a view from Agnus Drive, illustrating that the view of the campus is obstructed by street trees from the street itself. Other views along Agnus Drive and from the rear yards of residential uses on Agnus Drive are illustrated in Figures 5.2-3 and 5.2-4.

Foothill Road has been designated as a "scenic drive" in the City of San Buenaventura Comprehensive Plan. As the VCMC campus borders this road, it lies within the viewshed of this specially-designated corridor. Visual resources along Foothill Road, in the vicinity of the project site, include southwesterly backdrop views of the Pacific Ocean and Channel Islands, and the city in the foreground. Based upon the campus' location in the primary viewshed of an adopted scenic drive, and based on the criteria presented in Appendix 5.2, the site can be considered to have a moderate to high level of visual sensitivity.

5.2.1.2 Shadows

Shadow lengths vary with the angle of the sun and the size and shape of the object creating the shadow. The primary shadowing effect produced by onsite structures occurs during the afternoon hours in winter. The longest shadows are produced on the winter solstice (December 21). The Hospital, at up to 60 feet in height, currently produces the longest shadows generated from the campus. Several trees surrounding the Hospital reach and exceed the 60-foot height, and also produce shadowing.

Residences are generally recognized as the most shadow-sensitive land use type. Due to their proximity to the Hospital and trees, some residences on the west side of Agnus may be



C. Existing view of the VCMC campus and uses south of the campus from 628 Whitecap Drive. Proposed project structures would be visible from this vantage point.



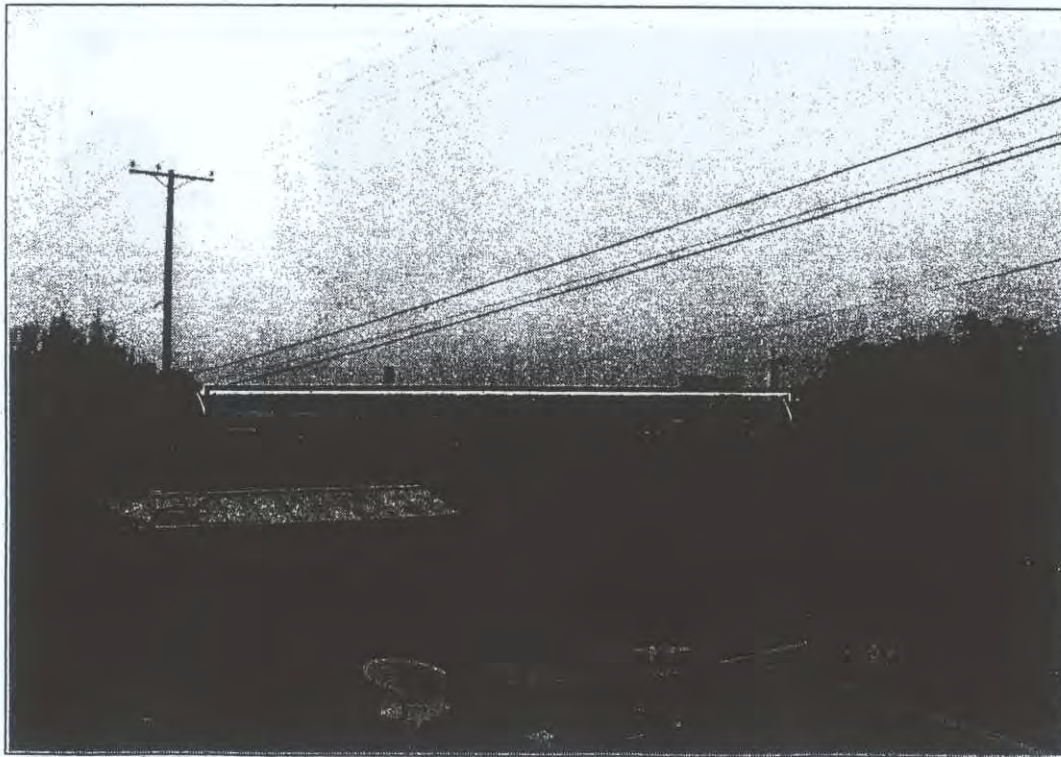
D. Existing view looking south along Agnus Drive from the intersection of Agnus Drive and Fairmont Drive. This view would not be altered by project implementation.

See View Orientation
Map, Appendix 5.2

EXISTING VIEWS OF THE 000340 CAMPUS



E. View of existing hospital from Agnus Drive looking west. This view would not change with project implementation.



F. View of site from rear yard at 357 Agnus Drive looking southwest. Line illustrates parapet of proposed parking structure. The viewshed area below the line would be obstructed.

See View Orientation
Map, Appendix 5.2

EXISTING VIEWS OF THE VCMC CAMPUS

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G. Public view of the VCMC campus and uses southwest of the campus from 404 Agnus Drive. The only campus structure that can be seen from this location is the VCMC Hospital. The proposed Ambulatory Care Clinic and parking structure would be visible but would not significantly affect the viewshed.



H. View of the VCMC campus from a side yard at 365 Agnus Drive. Although it would be partially obscured by the tree in the center-left of the photograph, the proposed parking structure would be visible from this location in the left portion of the photo.

5.2 Aesthetics/Shadows/Light and Glare

affected by shadowing. Other onsite structures are low enough and far enough away from sensitive uses so as not to create adverse shadowing effects.

5.2.1.3 Light and Glare

Sources of light are primarily associated with urban uses and include interior and exterior night lighting, vehicular lighting from nighttime operation of vehicles, advertising signage, and street, storefront and security lighting. Glare is generated when sunlight is reflected from surface materials. Materials that can produce glare effects include asphalt parking lots, glazed surfaces and metallic surfaces.

The VCMC campus is currently equipped with night lighting for security and safety purposes. Additionally, buildings have internal lighting which can be seen from outside. Due to slope and related viewshed characteristics of the campus, the land uses most sensitive to night lighting include the residential area located north, east and west of the project site. Figure 5.2-5 provides a daytime and nighttime view of the site illustrating the effect of night lighting from a residential area north of the campus.

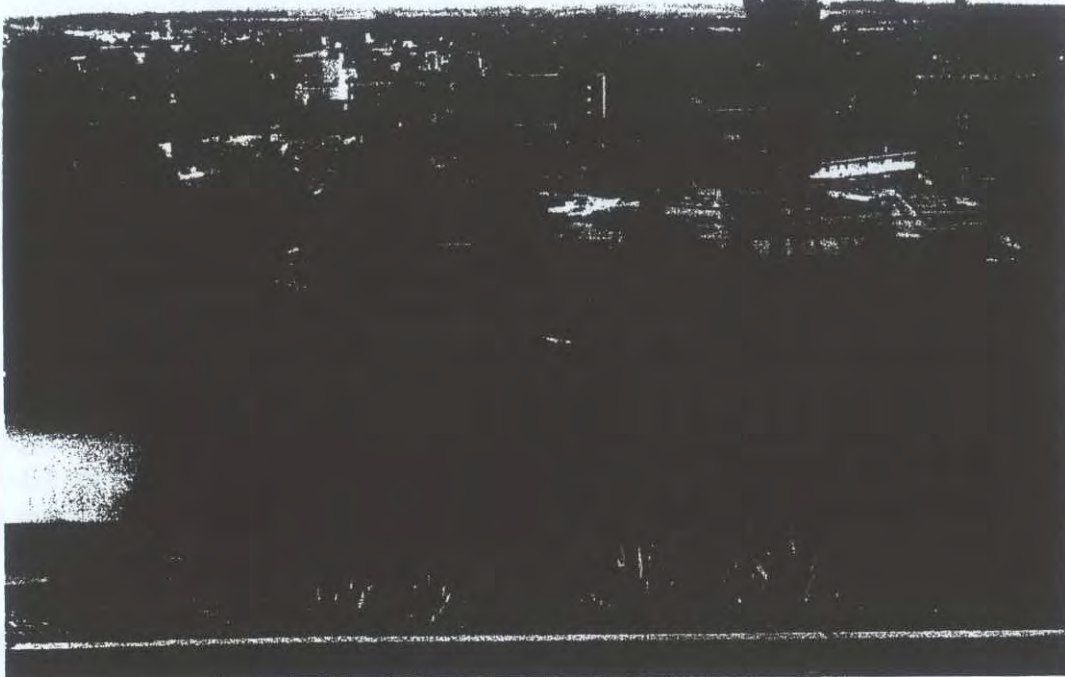
The same land uses (residences) are apt to be the most affected by glare emanating from the campus. However, due to the relatively low amounts of glazing and shiny surface metal materials used for building facades at the campus, most of the existing glare effects are generated by automobiles; either in transit through the campus or parked in surface lots. Owing to the perimeter landscaping of the campus, much of the glare effect is minimized.

5.2.1.4 Regulatory Setting

Visual (aesthetic) resources within the City of Ventura are defined and protected primarily through the Community Design Element of the City's Comprehensive Plan (1989). In addition, architectural review is conducted by the City's Architectural Review Board for much of the development proposed in the City.

The Community Design Element contains objectives, goals and policies which relate directly and indirectly to the protection of scenic resources. Of particular significance in the evaluation of the potential aesthetic impacts of the proposed project are policies relating to site design. Because the evaluation of aesthetic impacts is a subjective process, the guidance provided by policies set forth in the Community Design Element is particularly useful in evaluating the significance of potential impacts. The policies also help define mitigation measures necessary to ensure that development proceeds in a manner consistent with the City's goals relating to the scenic component of the community's identity.

The City of Ventura Zoning Ordinance (Title 15) has been established to promote and protect the public health, safety, and general welfare. Among the various objectives of the Zoning Ordinance are several relating to aesthetics including the promotion of development at appropriate densities in order to conserve and enhance the City's physical scale and character as



I. Daytime view of the VCMC campus from north of the site along Grove Street.



J. Nighttime view of the VCMC campus from north of the site along Grove Street.

5.2 Aesthetics/Shadows/Light and Glare

defined in the Comprehensive Plan. Of specific relevance to aesthetics is Chapter 15.845 Design Review Procedure. Design review is implemented by the Architectural Review Board (ARB) and is discussed further below.

The City's architectural review procedure is a review and approval process in which the City's ARB examines a proposed project's layout, building design, landscaping, parking, signage and other features affecting the project's appearance. By law, the ARB is charged with administering architectural review in a way that benefits the community. As a County project, the VCMC expansion is not subject to the city's architectural review process. However, because the VCMC campus is located within the City, this analysis will include City evaluation criteria.

5.2.2 Impact Analysis

5.2.2.1 Methodology and Significance Thresholds

a. Aesthetics. This analysis was based upon visual reconnaissance and photo-documentation of the site from area viewing corridors; and review of proposed plans for the VCMC project, applicable planning documents referenced above, and relevant information contained in other sections of this report.

The analysis of aesthetic resource impacts is by its nature subjective; however, the evaluation criteria discussed above and in Appendix 5.2 provide direction for the assessment of potentially significant aesthetic impacts. For the purposes of this analysis, it is assumed that the project would have a significant adverse aesthetic impact if the project would result in the deterioration of the scenic variety or visual condition of the project site, or cause the obstruction of existing scenic views. A beneficial impact was determined to result if the project would improve or enhance visual features or views.

The *State CEQA Guidelines* Appendix G (a) states that a project will normally have a significant effect on the environment if it will "conflict with adopted environmental plans and goals of the community in which it is located." Therefore, for the purpose of this analysis the project is considered to result in a significant aesthetic impact if it conflicts with the visual resources goals and policies outlined in the Community Design Element of the City of Ventura's Comprehensive Plan.

b. Light and Glare. For the purposes of this analysis, the proposed project would result in a significant light and glare impact if it would substantially increase the sources of light and glare at the project site in a manner that would adversely effect sensitive land uses.

c. Shadowing. The impacts of shadows can vary depending upon the land uses affected and the degree to which solar access is obstructed. Solar access is defined as the potential to receive solar rays as an energy source. As previously discussed, it is generally recognized that the most shadow-sensitive uses are residential. This is because of the potential

5.2 Aesthetics/Shadows/Light and Glare

of shadowing to inhibit or eliminate passive or active solar heating. Furthermore, natural lighting of a home's interior, home gardening and recreational uses are affected by sunlight availability.

Shadow patterns vary according to the surrounding uses, the time of day, and season. The longest shadows are generated on the shortest day of the year, the winter solstice (December 21). Conversely, the shortest shadows are produced on the longest day of the year, the summer solstice (June 21). Daily shadowing effects vary accordingly between the two solstices. If shadow lengths affecting any building are cast over 25 percent of an existing roof top at any time of year, the potential for use of solar energy devices is adversely affected; therefore, for the purposes of this analysis, if such shadowing affects would be produced by the project, it was determined that a significant impact would result.

5.2.2.2 Project Impacts

a. **Aesthetics.** The proposed project involves the demolition of several existing VCMC structures located in the southeastern quadrant of the site and the northeastern corner of the intersection of Loma Vista Road and Hillmont Avenue (illustrated in Figure 3.4-1). Four new structures would be constructed at the campus (illustrated in Figure 3.4-2).

The Mental Health In-Patient Unit would be a one-story structure which would be located on the site currently occupied by the two-story PSSA Building. The proposed structure would have rectilinear and square window and door treatment, accented by wood and metal trellis treatment. The surface materials to be used include cement and plaster with horizontal striations, split-face block, and small tile detailing. Metal mesh of approximately 6.5 feet in height would be placed in two areas above the roof line to screen mechanical equipment. The current landscaped area in front of the HCA Business Office (PSSA Building) would also be removed and built upon as part of the proposal. A segmented, 10-foot-high, split-face block wall will curve around exterior plaza areas on the Loma Vista Road and Hillmont Avenue frontages. The walls would screen both the plazas and parts of the structural walls from view of the public street and sidewalk system. The landscape plan for the Mental Health In-Patient Unit proposes street trees (Western Catalpa and California Sycamore) as well as other trees to be located primarily along the southern and western site boundaries. Special paving, lawn areas and shrub coverage are also features of the landscape plan.

The five-story ACC would be located directly north of the existing Hospital in the area currently occupied by the Hospital cafeteria, components of the Family Care Complex, and associated landscaped and paved areas. The structure would be linked to the Hospital at the ground floor with a one-story corridor. The architectural concept is illustrated on the elevations shown in Figure 3.4-4. At five stories, the ACC would be the most prominent addition to the campus. Its style can be described as contemporary modernist, updating but remaining consistent with other institutional-style structures on the campus. Highly articulated entryway design is accomplished with recessed windows and square window framing mullions. Glazing is to be accomplished with blue and green tinted glass. The massing and scale of this structure would be consistent with that of the existing Hospital. Windows and doorways would provide some

5.2 Aesthetics/Shadows/Light and Glare

degree of aesthetic linkage to the Hospital to which it would be physically attached. The proposed landscape plan for the Ambulatory Care Clinic includes: expanses of lawn and courtyard areas east and north of the structure including areas designated for play and picnicking (these areas would be accented with Queen Palms); border trees (e.g., Catalina Cherry, Tipuana, Aristocrat Pears); and the use of shrubs, ground covers, and vines.

The proposed three-level parking structure would be located in the area currently occupied by several plant operations buildings, and associated paving and landscaping. Due to sloping conditions of the site, the northeastern portion of the parking structure would be partially below grade, thereby reducing its above-grade appearance. The top of the parking structure would be below the top of the existing boiler and laundry building.

The proposed one-story Medical Examiner Facility would be located at an upland campus site that is currently vacant. The proposed facility is a one-story structure of simple, modernist rectilinear lines with minimal architectural detailing. The surface material for the structure would be cement plaster. Roofing would be clay mission tile. Due to slope characteristics of the site, the structural facade would not be completely visible from the Foothill Road frontage. The landscape plan for the Medical Examiner Facility proposes a perimeter border of shrubs and plants surrounded by bark mulch, and erosion control seeding beyond the border to the north and west of the facility, and erosion control ground cover to the south.

1. *Short-term Impacts.* Demolition of existing facilities and construction of all four new facilities would occur over a period of approximately 3 years. Only the ACC building would involve the use of a crane, which has the potential to obstruct views. All construction activity will alter and temporarily affect the aesthetics of the campus. However, although adverse, this impact is considered to be less than significant due to its temporary nature.

2. *Long-term Impacts.* The overall effect of the project would be to consolidate numerous existing facilities into larger facilities. Because the current arrangement of campus structures lacks a consistent architectural or site planning theme, and because the scale and massing of structures varies greatly, implementation of the proposed project may improve the aesthetic clarity of campus. However, the existing Loma Vista front yard setback that runs the width of the campus would be adversely affected by the Mental Health In-Patient Unit. Additionally, none of the new structures would be architecturally incompatible with the remaining campus buildings, nor would they relate to one another in a coherent design scheme.

Finally, though open area in the vicinity of the proposed ACC would increase due to the removal of several structures, the introduction of a five-story structure north of the existing Hospital would intensify the urban character of the campus. Its height and massing would lend to its dominance among the campus buildings. Though this effect is not inherently adverse as an internal campus urban design issue, it would continue and increase the abrupt transition of scale from the campus to the single-family neighborhood immediately east of the campus. The

5.2 Aesthetics/Shadows/Light and Glare

fact that the existing scale difference may be furthered by the ACC building can be considered a significant impact to aesthetic conditions.

The site clearance and construction of the ACC facility would result in the removal of up to four potentially landmark-quality trees. Landmark-quality is defined as a tree of at least 50 years in age or 50 feet in height. Two such trees live between buildings 310 and 311, two others are between buildings 310 and 941 (see Figure 3.4-1). This removal can be viewed as an adverse impact to aesthetic conditions. It should, however, be noted that the landscaped buffer that would be installed in conjunction with the ACC and parking structure would mitigate this impact to some degree by replacing existing one-story buildings with landscaped grounds.

Views from surrounding roadways and land uses would be altered with implementation of the proposed project. In particular, the viewshed that is visible from areas to the north and northeast of the site that are at higher elevations than the project site would be affected. The foreground views from Foothill Road and above would be minimally affected as a result of the construction of the proposed Medical Examiner Facility. The following features would be incorporated into the proposed Medical Examiner Facility design:

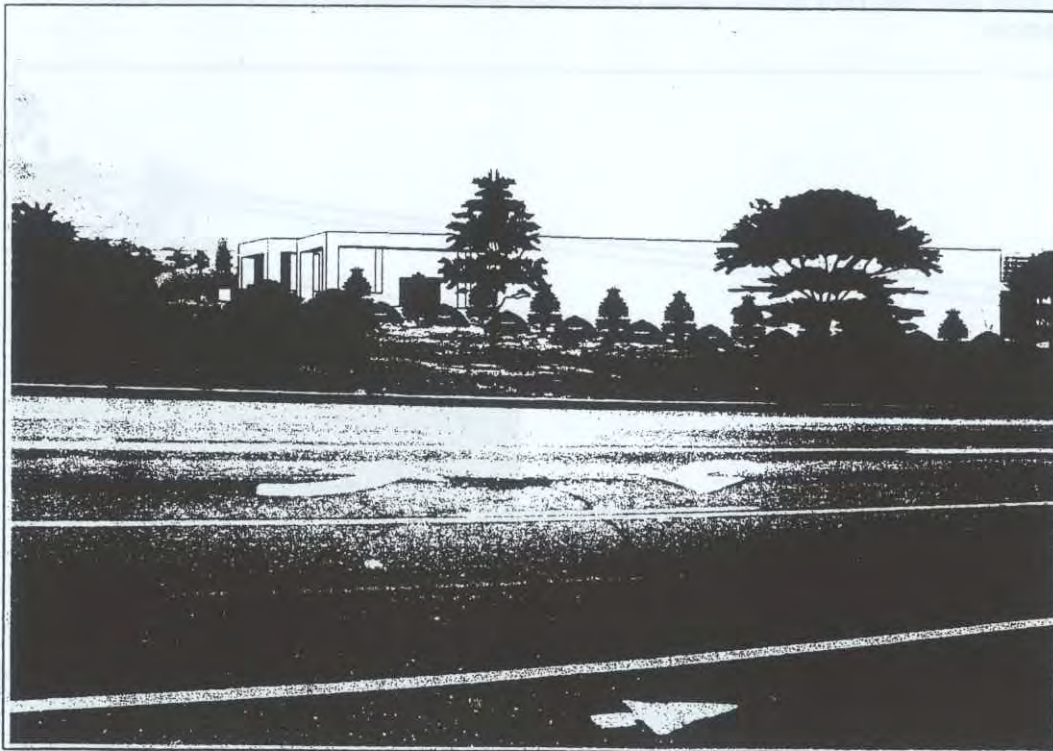
- Landscaping materials would not include trees or shrubs that would ultimately exceed the height of the building;
- The building would be a single story and building elevations would be stepped to effectively be compatible with surrounding topography and natural slope lines; and
- All mechanical operational units would be entirely screened from the view as seen from Foothill Road.

Figure 5.2-6 shows existing and post-project views from 3133 Foothill Road. Construction of this facility would block views from segments of this designated scenic drive. However, less than 20 percent of the viewshed experienced while traveling in a westerly direction along Foothill Road would be obstructed. This is considered to be a less-than-significant aesthetic impact. Other proposed facilities would be at lower elevations and would not adversely affect distant ocean, island and city views. However, middle-ground views of the Midtown area of the City of Ventura would be altered somewhat. Nevertheless, the alteration does not result in an obstruction of a uniquely scenic feature, and would, therefore, be less than significant.

Views of the campus from the northeastern portion of Agnus Drive are currently obstructed due to intervening trees as seen on Figure 5.2-2 D. However, views from the side and rear yards of some homes on the western side of Agnus Drive would be altered with project implementation. Figure 5.2-7 shows existing and post-project views from the rear yard of 273 Agnus Drive. The viewshed from public areas along Agnus Drive (street and sidewalk) would not be substantially changed. Therefore, viewshed impacts associated with project implementation as viewed from these areas may be considered adverse to some residents, but is less than significant based upon the thresholds established above.



Existing southern view from 3133 Foothill Road.



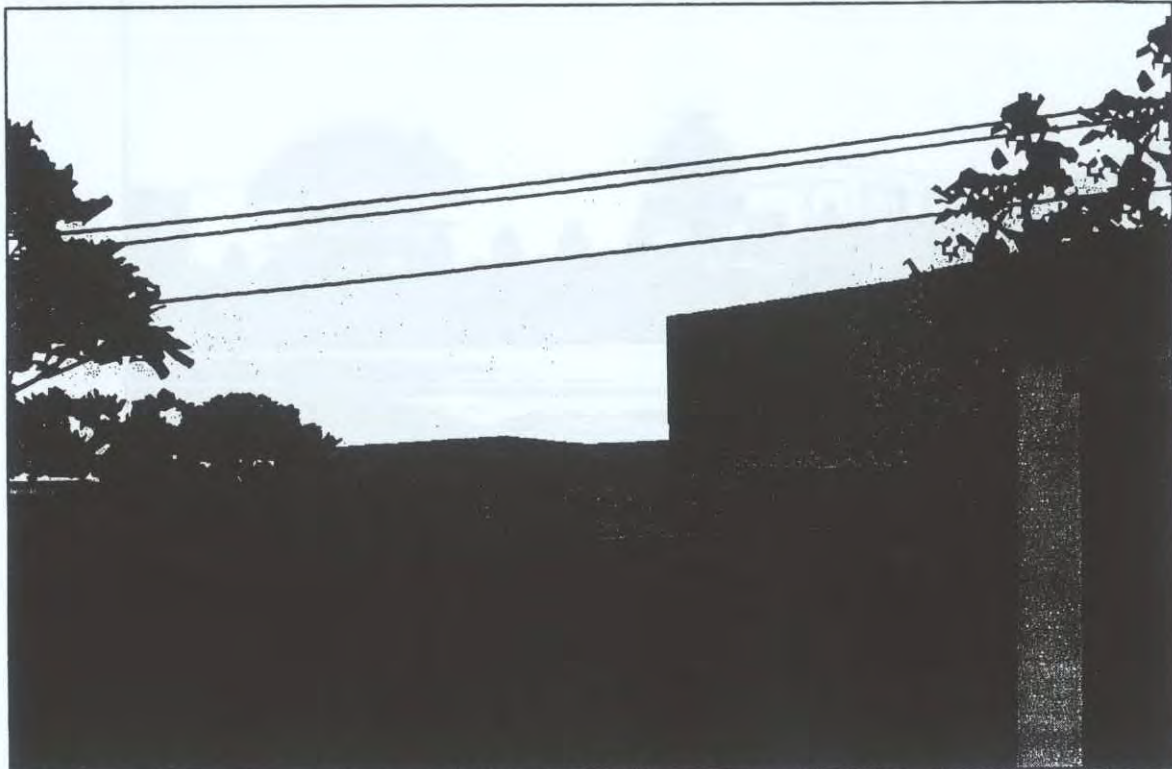
Proposed southern view from 3133 Foothill Road following implementation of the Coroner/Medical Examiner Facility Phase of the proposed project.

**EXISTING AND POST-PROJECT VIEW
FROM FOOHILL ROAD**

000349



M. Existing view from rear yard at 273 Agnus Drive looking southwest toward proposed Family Care Complex.



N. Post-Project view showing proposed Ambulatory Care Clinic.

EXISTING AND POST-PROJECT VIEW
FROM AGNUS DRIVE

000350

5.2 Aesthetics/ Shadows/ Light and Glare

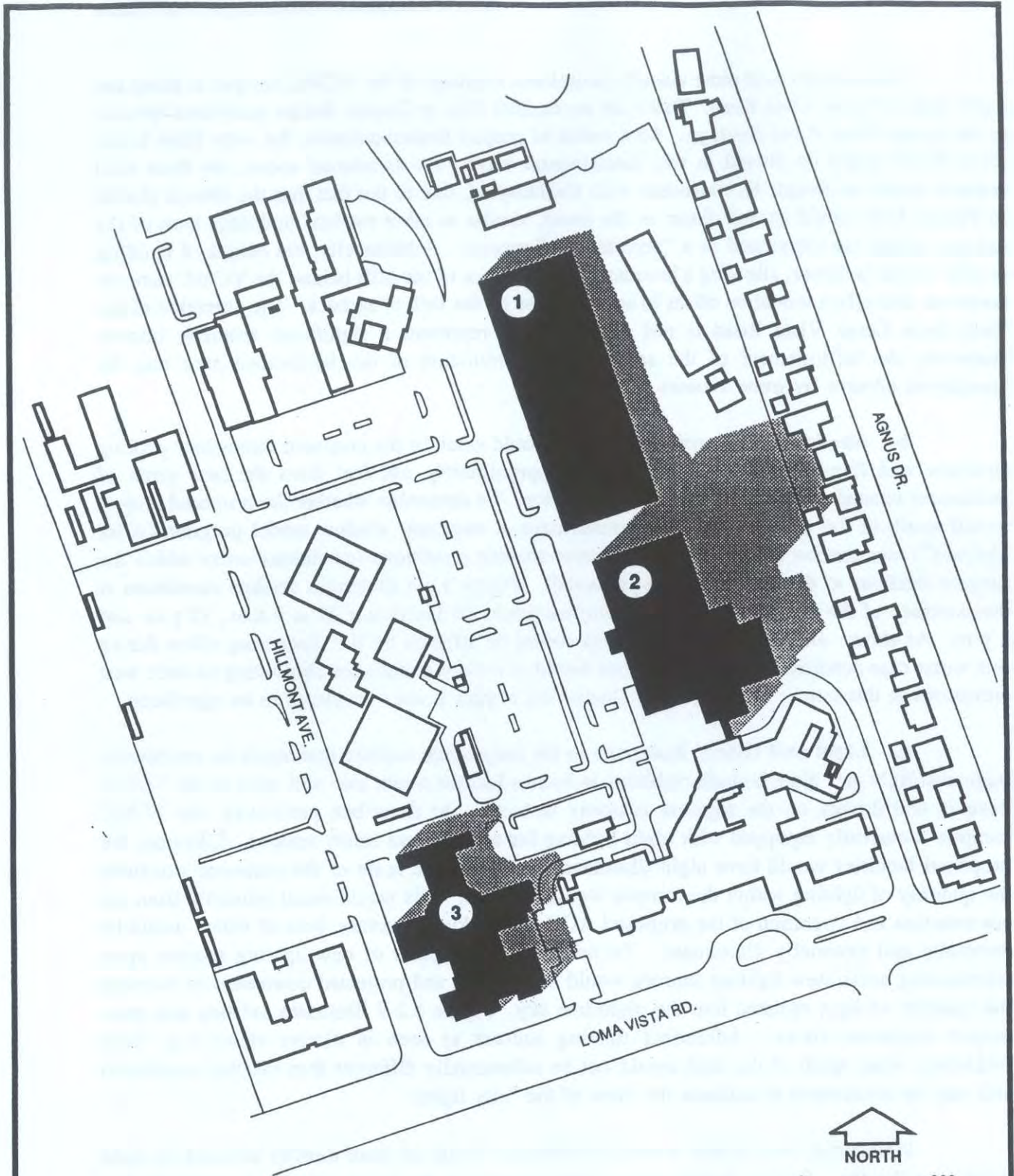
The primary and most visually prominent frontage of the VCMC campus is along the north side of Loma Vista Road. There are no explicit City or County design guidelines specific to the Loma Vista Road frontage. As a result of project implementation, the view from Loma Vista Road would be altered in two fundamental ways. As mentioned above, the front yard setback would no longer be consistent with the Hospital, due to the fact that the Mental Health In-Patient Unit would extend closer to the street, similar to other medical buildings west of the campus which are developed in a "zero-lot-line" manner. Additionally, the height of building profile would be lower, allowing a broader backdrop view of the hills behind the VCMC campus; however, this effect would be offset to some degree by the lack of setback. The alteration of the view from Loma Vista Road is not considered to represent a significant aesthetic impact. However, the infringement of the setback and elimination of the landscaped area may be considered adverse by some viewers.

b. Shadows. The proposed project would result in the proposed three-story parking structure and five-story ACC being located approximately 140 feet from the rear yards of residences located on the west side of Agnus Drive. To determine whether the proposed project would result in the shadowing of these residences, a computer shadow model program (Alias Upfront™) was run for the project under winter solstice conditions (conditions under which the longest shadows to the east would be produced). Figure 5.2-8 illustrates shadow conditions at the interface of the project site and adjacent residences on December 21 at 9 a.m., 12 p.m. and 3 p.m. As shown on the figure, no rooftops would be affected by the shadowing effect during this worst-case condition. Three residences would, however, experience shadowing on their west elevations at this hour. This degree of shadowing impact is not considered to be significant.

c. Light and Glare. Receptors in the project site vicinity that might be sensitive to increased light and glare include residents in homes located north, east and west of the VCMC campus and drivers on the adjacent roadway network. As described previously, the VCMC campus is currently equipped with night lighting for security and safety reasons. Likewise, the proposed facilities would have night illumination. Due to the scale of the proposed structures the quantity of lighting within the campus would increase. This would result primarily from the construction and operation of the proposed ACC and parking structure, both of which would be internally and externally illuminated. To minimize the impacts of new lighting sources upon surrounding areas, new lighting sources would be shielded and projected downward to decrease the quantity of light radiated into the nighttime sky. Figure 5.2-9 illustrates existing and post-project nighttime views. Additional lighting sources as seen in distant views (i.e., from residential areas north of the site) would not be substantially different than existing conditions and may be considered to enhance the view of the "city lights".

Residential uses closest to the new facilities would be more directly affected by night lighting at the site. Several factors exist or are featured in the proposed project standards that would mitigate impacts, as follows:

- All exterior lighting would be hooded and directed away from residential uses;



AGNUS DR.

HILLMONT AVE.

LOMA VISTA RD.



- ① Parking Structure
- ② Ambulatory Care Clinic
- ③ Mental Health Inpatient

000352

SHADOW ANALYSIS
DECEMBER 21 - 3:00 PM



O. Pre-project view of the VCMC campus.



P. Post-project view of the VCMC campus.

NIGHTTIME LIGHTING IMPACTS

000353

5.2 Aesthetics/Shadows/Light and Glare

- The new uses would be set back approximately 150 feet from the rear yards of residences on Agnus Drive in most areas; and
- Existing vegetation, walls, and structures block (entirely or in part) the line-of-sight to many residences.

Nevertheless, parking structure lighting standards designed to illuminate the upper level have the potential to flood nearby areas with undesired lighting. The additional lighting at the site may be considered adverse to some nearby residents, and could be potentially significant. It is expected that construction plans for the proposed parking structure would include design features that would block vehicle headlights from illuminating areas outside of the structure. The potential for vehicle lighting from the parking structure to illuminate nearby residences is considered to be a potentially significant lighting impact.

The proposed project would maximize the use of non-reflective materials in its construction including non-reflective glass for the proposed ACC and metal screening for the Mental Health In-Patient Unit and is, therefore, not expected to substantially increase the amount of reflective surfaces on the site. Additionally, the primary potential source of glare would be automobiles parked at surface lots. Because many cars would be structure-parked upon project implementation, glare impacts from this source would likely diminish.

d. Consistency with Relevant Plans and Policies. The following is a list of applicable policies from the Community Design Element of the City of Ventura Comprehensive Plan and a determination of the project's consistency with each policy. Each policy is described in summary format. Any direct inconsistency is indicated.

Policy 1.12 Use trees and plants to visually link and blend projects.

The three proposed project landscaping plans, like the architectural plans, were prepared by different landscape architects. A review of plant lists proposed indicates that none of the three plans are coordinated with one another. The plan for the ACC facility does call for retention of several large, established trees. Because the three landscape plans illustrate no clear linkage with one another, the proposed project may be inconsistent with this policy.

Policy 2.1 Orientation of structures should consider views and visual relationship with surrounding areas.

The project would result in the alteration of views from Foothill Road, a County potentially-designated and City-designated scenic corridor. Additionally, the ACC structure would alter views from some Agnus Drive residential properties. Finally, the height and massing of the ACC facility would continue and increase the difference in urban scale between the campus and the single-family residential area to the east of the campus. Therefore, the project is potentially inconsistent with this policy.

5.2 Aesthetics/Shadows/Light and Glare

Policy 2.3 *Site design should be within context of established streetscape.*

The project is potentially inconsistent with this policy because the Mental Health In-Patient Unit would eliminate the setback pattern that has been established along the width of the VCMC site's Loma Vista Road frontage. It should, however, be noted that the overall setback pattern along much of Loma Vista Road is from 0 to 10 feet.

Policy 2.5 *Setbacks and building separation should acknowledge need for adequate natural light and air.*

The project is consistent with this policy because proposed structures have adequate space between them, and may improve light and air conditions through the consolidation of several small facilities into more organized units.

Policy 2.13 *Screening of vehicular loading areas.*

The project is potentially consistent with this policy based on screening as illustrated in design plans.

Policy 2.18 *Style and materials should harmonize with surroundings.*

The project is potentially consistent because the architectural styles of the three primary facilities do not depart from the established variations of post-World War II modernist styles which dominate campus architecture.

Policy 2.19 *In areas where a predominant style has not been established new development should be of the highest quality possible.*

This policy is not relevant to the proposed project (please refer to policy 2.18, above).

Policy 2.21 *Incorporation of design characteristics to create attractive visual image from public rights-of-way.*

The proposed project is generally consistent with this policy. However, the setback intrusion discussed in policy 2.3 above may represent an inconsistency.

Policy 2.24 *Landscaping used to relieve building elevations.*

The three landscape plans illustrated for the proposed project appear to relieve building elevations by softening the effect of building elevations on adjacent uses.

5.2 Aesthetics/Shadows/Light and Glare

Policy 2.27 *Landscape design concern for balance, scale, form, texture and unity and ancillary issues (shade, erosion prevention...).*

The project is potentially consistent with this policy because the existing landscape plan for the project appears to show concern for the design considerations listed.

Policy 2.30 *Lighting ...overall lighting levels should be compatible with the neighborhood's ambient lighting level.*

The VCMC campus is currently much more intensely lit than surrounding neighborhoods because of its nature as a region-serving health and welfare provision facility. Although the proposed project would not significantly alter this condition, design features associated with the project would minimize overall lighting impacts on adjacent uses. Therefore, the proposed project is consistent with this policy.

Policy 3.1 *Gradual transition of building size, height and shape.*

The ACC facility is potentially inconsistent with this policy due to the differential in height and massing between it and the adjacent residential structures. At the same time, it should be noted that a height and massing inconsistency currently exists between the neighborhood and the VCMC Hospital, which is similar in scale to the ACC.

Other facilities, including the parking structure, would be consistent with the policy.

Policy 3.2 *Blend apparent density of development with surroundings.*

Please refer to discussion of policy 3.1, above.

Policy 3.3 *Articulation of massive buildings to support existing scale of development.*

The proposed project structures incorporate articulation of massing. Therefore, the project is potentially consistent with this policy.

Policy 3.5 *Use of architectural materials, colors and textures to enliven simple masses and relate structure to its environment.*

The project is potentially consistent with this policy (see discussion for Policy 2.18).

Policy 6.2 *Positive contribution of buildings and landscaping in scenic corridor.*

The project is potentially inconsistent with this policy due to the alteration of views from Foothill Boulevard associated with the Medical Examiner facility and the ACC facility.

5.2 Aesthetics/Shadows/Light and Glare

Policy 6.6 *Preservation of views should be an important criteria for projects located in scenic corridors of the City.*

Although the Medical Examiner Facility would alter views from portions of Foothill Road, less than 20 percent of the view from Foothill Road experienced while traveling west on Foothill Road would be obstructed by the one-story structure. The proposed project is not considered inconsistent with this policy.

Policy 6.12 *Require the use of dense landscape buffers along scenic routes.*

The proposed project neither contributes nor detracts from the character of the corridor. The viewshed from the Foothill Road corridor is essentially preserved in the site plan for the proposed project. A landscape buffer is proposed along Foothill Road in front of the proposed Medical Examiner Facility, and existing trees would remain. The proposed project is, therefore, consistent with these policies.

5.2.2.3 Cumulative Impacts

The proposed project, in conjunction with other proposed projects in the Midtown district of the City of Ventura, would contribute to an ongoing change to urban design character to one of a more intense urban nature. In particular, the proposed Buenaventura Mall expansion, two blocks to the south of the VCMC campus, would be visible from the Foothill Road corridor as well. This change is not in and of itself adverse to aesthetics, as design detailing of these and other projects can smooth this intensification without damage to the City's aesthetic condition.

The viewshed from the Foothill Road corridor of the Pacific Ocean and Channel Islands would not be significantly altered by the cumulative change.

5.2.3 Mitigation Measures

5.2.3.1 Project-Specific

The proposed project includes a number of design features which would reduce impacts related to aesthetics, shadows, light, and glare (see Section 3.7, Project Design Features). The measures recommended below would further mitigate project impacts.

a. Aesthetics. The following measures are recommended to mitigate short-term adverse impacts associated with the demolition and construction phase of the project, to provide a more unified theme for the project components, to mitigate viewshed alteration for Agnus Drive residents, and to mitigate the loss of landmark-quality trees.

5.2 Aesthetics/Shadows/Light and Glare

AES-1 Demolition Housekeeping Plan. Prior to the commencement of demolition activities, the County and contractor(s) should jointly prepare a demolition/construction good-housekeeping plan for the project. The plan should include such information as designation of onsite locations for materials and equipment storage, schedule for debris removal, description of proposed screening mechanisms, etc.

AES-2 Design Plans Coordination. The proposed architectural and landscaping plans for the proposed structures should, under County supervision, be modified by their respective architects and landscape architects to ensure that features that would serve to create design linkages between the buildings (such features can include surface textures and materials, finish colors, landscaping palette and hardscape materials and patterns, consistent window and door treatments etc.).

AES-3 Utility Undergrounding. The existing Southern California Edison (SCE) utility lines strung along the border of the VCMC campus and adjacent residential properties along the west side of Agnus Drive shall be reinstalled underground and the utility poles removed. The undergrounding shall take place in accordance with SCE practices and induce a minimal amount of inconvenience for neighborhood residents.

AES-4 Specimen Tree Replacement. In instances where the siting of proposed structures would result in the removal of trees over 50 feet in height, a specimen of an equivalent type and of a minimum box size of 24 inches shall be planted as a replacement. The replacement location shall be selected by the landscape architect for the site, and shall be as close as feasible to the original location, where consistent with improving the viewshed.

b. Shadows. No significant shadowing impacts would result. Therefore, no mitigation measures are required.

c. Light and Glare. The following measure is required to ensure that vehicle lighting from the proposed parking structure does not interfere with nearby residential uses.

AES-5 Parking Structure Walls/Landscaping. The parking structure shall be designed with sufficient facade articulation so as to alleviate monolithic effect. Walls shall be of sufficient height to block vehicular lighting from projecting outside of the structure. The landscaping scheme shall include plants which will serve to buffer the structural massing.

AES-6 Parking Structure Lighting. The lighting for the proposed parking structure's rooftop level will be mounted on the lowest standards allowed by

5.2 Aesthetics/Shadows/Light and Glare

building code, and would be properly hooded and directed so as to eliminate any direct pooling of light onto residential properties.

5.2.3.2 Cumulative

No significant cumulative impacts would result. Therefore, no cumulative mitigation measures are required.

5.2.4 Residual Impacts

The short-term aesthetic impact associated with disruption of the site during construction is considered adverse, but less than significant, and would be further reduced through implementation of the recommended measure, AES-1. The potentially significant impact that would result if vehicle lighting from the parking structure illuminated nearby residences, would be reduced to a less than significant level with implementation of mitigation measures AES-5 and AES-6. Measure AES-4 would mitigate impacts related to the loss of trees onsite. The policy inconsistencies associated with absence of visual linkages in the project from use of plants and urban design features (City Policies 1.12 and 6.2) would be reduced to less than significant through implementation of mitigation measure AES-2.

The significant impact and policy inconsistencies associated with the continuation of the urban scale/massing differences of existing and proposed project structures with relation to residential structures on Agnus Drive (City Policies 2.1 and 3.1) would remain if the project components remain the same size and in the same location as proposed. In addition, the Mental Health In-Patient Unit would remain potentially inconsistent with City Policy 3.2.

5.3 TRANSPORTATION AND CIRCULATION

This section evaluates the potential traffic impacts of the proposed project on the streets and intersections in the vicinity of the site. This analysis is intended to satisfy the traffic impact requirements of the City of Ventura and be consistent with Ventura County's General Plan Circulation Element policies.

Since the circulation of the May 18, 1993 Notice of Preparation, future onsite parking needs were re-analyzed. As a result of that analysis, it was determined that future additional onsite parking demand would be only 500 spaces, as compared to the 564-space additional demand identified in the NOP. The results of the re-analysis of future onsite parking are presented in Appendix 5.3.

5.3.1 Setting

5.3.1.1 Existing Street Network

Regional access to the VCMC Campus is provided by the Ventura (U.S. 101) Freeway. This six-lane facility, located approximately 2 miles south of the project site, is a major highway which extends through Ventura County and links Ventura with the neighboring communities of Santa Barbara, Oxnard and Camarillo. This highway is one of the main thoroughfares used by local commuters as an intra-community route. Primary access from the U.S. 101 Freeway is provided via the ramp connections at Main Street and Donlon Avenue and the interchange at Seaward Avenue. The principal local network of streets which serve the project site consists of Main Street, Mills Road, Telegraph Road, Loma Vista Road, Hillmont Avenue and Foothill Road. The following discussion provides a brief synopsis of these key area streets. These descriptions are based on an inventory of existing roadway conditions.

- **Main Street** is an existing east-west arterial located south of the VCMC site. Main Street originates at its junction with Telephone Road and extends westerly into the City's downtown business district. This primary roadway varies from a four-lane roadway with a painted median to a six-lane arterial with a raised median. Daily traffic on Main Street totals approximately 28,200 vehicles per day (vpd).
- **Mills Road** is a north-south arterial located east of the project site. Mills is presently a four-lane, divided roadway with a raised median between Telegraph and Main. Mills extends southerly from its terminus at Loma Vista Road connecting with Preble Avenue south of Main Street. Parking is not permitted along most sections of this roadway. Mills Road is estimated to carry daily traffic volumes on the order of 29,400 vpd between Telegraph and Main.
- **Telegraph Road** is an east-west arterial which extends easterly from its terminus at Thompson Boulevard and Main Street to the City of Santa Paula. Telegraph

5.3 Transportation and Circulation

Road is constructed as a four-lane roadway with a raised median in the vicinity of the project. Daily traffic volumes on Telegraph total about 21,300 vpd.

- **Loma Vista Road** is an east-west arterial which borders that VCMC campus on the south. Loma Vista is four-lane, divided roadway which originates at its junction with Main Street and extends easterly to Victoria Street. Parking is permitted along most sections of this roadway. Daily traffic volumes on Loma Vista range from 11,000 vpd to 22,100 vpd.
- **Hillmont Avenue** is a two-lane local street internal to the VCMC campus. This roadway runs in a north-south direction between Foothill Road and Loma Vista Road. Parking is permitted on Hillmont Avenue. Traffic volumes on this local roadway are estimated to total 4,000 vpd.
- **Foothill Road** is a two-lane local street that borders the VCMC campus on the north. Traffic volumes on Foothill, adjacent to the site total about 9,600 vpd.

5.3.1.2 Existing Area Traffic Volumes

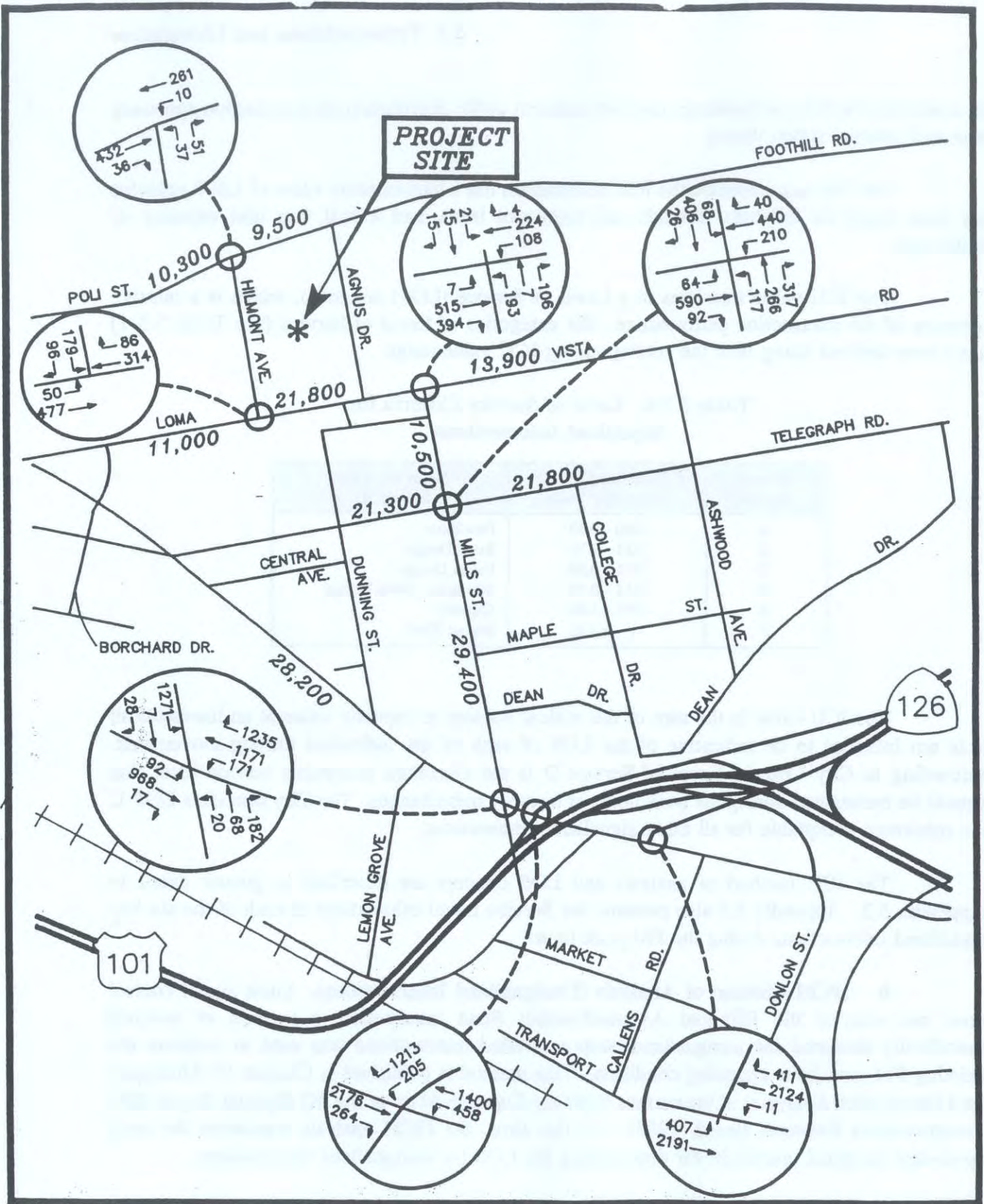
Existing PM peak hour traffic volumes for the seven study intersections listed below were obtained from the City of San Buenaventura and supplemented with manual PM peak hour turning movement counts performed by H.K. Traffic Data in June 1993.

1. Mills Road at Loma Vista Road - signalized with 2-phase (ϕ) operation
2. Mills Road at Telegraph Road - signalized with 8 ϕ operation
3. Mills Road at Main Street - signalized with 8 ϕ operation
4. U.S. 101 Northbound Ramps at Main Street - signalized 4 ϕ operation
5. S.R. 126 Eastbound On-Ramp at Main Street - signalized 4 ϕ operation
6. Hillmont Avenue at Loma Vista Road - signalized 2 ϕ operation
7. Hillmont Avenue at Foothill Road - Stop-Controlled T-intersection

Figure 5.3-1 presents the existing traffic volumes in the PM peak hour of operation for the seven study intersections. The average daily traffic (ADT) volumes on key area roadways are also shown.

5.3.1.3 Existing Area Traffic Volumes

a. **ICU Method of Analysis (Signalized Intersections).** In conformance with City of Ventura requirements, existing PM peak hour operating conditions for the six signalized intersections evaluated in this report have been investigated employing the Intersection Capacity Utilization (ICU) method. The ICU technique is intended for signalized intersection analysis and estimates the volume to capacity (V/C) relationship for an intersection based on the individual V/C ratios for key conflicting traffic movements. The ICU numerical value represents the percent signal green time, and thus capacity, required by existing and/or future traffic. It should



5.3 Transportation and Circulation

be noted that the ICU methodology assumes uniform traffic distribution per intersection approach lane and optimal signal timing.

Per City requirements, the ICU calculations use a lane capacity value of 1,600 vehicles per hour (vph) for left-turn, through, and right-turn lanes, and a dual turn lane capacity of 3,200 vph.

The ICU value translates to a Level of Service (LOS) condition, which is a relative measure of the intersection performance. Six categories of Level of Service (see Table 5.3-1) have been defined along with the corresponding ICU value range.

Table 5.3-1. Level of Service Criteria for Signalized Intersections

Level of Service	Intersection Capacity Utilization Value	Level of Service Description
A	0.00 - 0.60	Free Flow
B	0.61 - 0.70	Rural Design
C	0.71 - 0.80	Urban Design
D	0.81 - 0.90	Maximum Urban Design
E	0.91 - 1.00	Capacity
F	≥ 1.01	Forced Flow

The ICU value is the sum of the critical volume to capacity ratios at an intersection; it is not intended to be indicative of the LOS of each of the individual turning movements. According to City Criteria, Level of Service D is the minimum acceptable service level that should be maintained during the peak hours at freeway interchanges. The City considers LOS C the minimum acceptable for all other signalized intersections.

The ICU method of analysis and LOS concept are described in greater detail in Appendix 5.3. Appendix 5.3 also presents the Service Level calculations at each of the six key signalized intersections during the PM peak hour.

b. HCM Method of Analysis (Unsignalized Intersections). Since signal control does not exist at the Hillmont Avenue/Foothill Road intersection, a method of analysis specifically designed for unsignalized, stop-controlled intersections was used to evaluate the existing PM peak hour operating condition. This method is published in Chapter 10 (Unsignalized Intersection Analysis) of the current *Highway Capacity Manual (HCM)* (Special Report 209, Transportation Research Board, 1985). At this time, the HCM analysis represents the most up-to-date accepted procedure for determining the LOS for unsignalized intersections.

Briefly, the procedure determines the available "Reserve Capacity" for various turning movements from the major street and stop controlled minor street traffic streams. Reserve capacity values are determined through a set of calculations which measure the relationship

5.3 Transportation and Circulation

between conflicting traffic on the major street and the availability of acceptable "gaps" in this stream through which a turning movement can be made from the stop controlled approach of the minor street. LOS conditions for each turning movement are grouped according to the magnitude of the available reserve capacity.

A large reserve capacity value suggests that a stopped vehicle will experience less delay passing through an intersection, and thus, there would be a better LOS. Whereas, other capacity calculation methods use one common value to describe total intersection operation, the Highway Capacity Manual method yields more than one reserve capacity value. Each value corresponds to each conflicting vehicular movement through the intersection.

The Level of Service criteria for unsignalized intersections have been defined and are shown in Table 5.3-2.

Table 5.3-2. Level of Service Criteria for Unsignalized Intersections

Level of Service (LOS)	Reserve Capacity (PCPH)	Expected Delay to Minor Street Traffic
A	≥ 400	Little or no delay
B	300 - 399	Short traffic delays
C	200 - 299	Average traffic delays
D	100 - 199	Long traffic delays
E	0 - 99	Very long traffic delays
F	≤ 0	Severe congestion

The HCM method of analysis and LOS criteria are described in more detail in Appendix 5.3.

c. **Existing Level of Service Results.** Table 5.3-3 summarizes the existing PM peak hour service level calculations for the seven study intersections based on existing traffic volumes and current street geometry. Review of the upper portion of Table 5.3-3 shows that based on the ICU method of analysis all six signalized intersections currently operate at acceptable LOS's during the PM peak commute hour.

However, given the close proximity of the Mills/Main, U.S. 101 northbound Ramps/Main and S.R. 126 eastbound On-Ramp/Main intersections with each other, the combined operation of these intersections is considered to be LOS D during the PM peak hour. On this basis, we conclude that the Mills/Main intersection effectively operates at an unacceptable LOS as defined by the City.

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Table 5.3-3. Existing PM Peak Hour Levels of Service

Key Signalized Intersection	ICU	LOS
Mills Road @ Loma Vista Road	0.42	A
Mills Road @ Telegraph Road	0.52	A
Mills Road @ Main Street ^a	0.75	C
U.S. 101 Northbound Ramps @ Main Street ^a	0.87	D
S.R. 126 Eastbound On-Ramp @ Main Street ^a	0.57	A
Hillmont Avenue @ Loma Vista Road	0.27	A
Key Unsignalized Intersection	Reserve Capacity	LOS
Hillmont Avenue @ Foothill Road:		
Northbound Left	312	B
Northbound Right	608	A
Westbound Left	728	A

^a Combined operation of these intersections are considered LOS D during the PM peak hour due to their close proximity with each other.

In addition, although the levels of service at the Mills/Telegraph and Mills/Main intersections calculate to LOS A and LOS C during the PM peak hour, respectively, field observations show that the existing westbound left-turn lane volumes at these intersections are not fully served by the green time and queues back up into the through lane.

Review of Table 5.3-3 also shows that the unsignalized Hillmont/Foothill intersection is currently operating at an acceptable LOS during the PM peak hour.

5.3.2 Impact Analysis

5.3.2.1 Methodology and Significance Thresholds

a. Methodology. In order to estimate the traffic impact characteristics of the proposed VCMC expansion, a multi-step process has been utilized. The first step is traffic generation, which estimates the total arriving and departing traffic on a peak hour and daily basis. The traffic generation potential is projected by applying the appropriate vehicle trip generation equations/rates for the desired land use(s).

The second step of the forecasting process is traffic distribution which identifies the origins and destinations of inbound and outbound project traffic. These origins and destinations are based on the demographics and existing travel patterns in the study area.

The third step is traffic assignment, which involves the allocation of project traffic to study area streets and intersections. Traffic assignment is typically based on minimization of travel time which may or may not involve the shortest route, depending on prevailing operating conditions and travel speeds. Traffic distribution patterns are indicated by general percentage

5.3 Transportation and Circulation

orientation, while traffic assignment is based on specific volume forecasts related to development conditions.

With the forecasting process complete and project traffic assignments developed, the impact of the project is evaluated by comparing operational conditions at selected key intersections based on expected future traffic conditions with and without forecast project traffic. The need for site-specific and/or cumulative local area traffic improvements can then be evaluated.

The relative impact of the added project traffic volumes generated by the VCMC Expansion Project during the PM peak hour was evaluated based on analysis of future operating conditions at seven key area intersections. Operating levels at key intersections were investigated based on existing plus project traffic volumes and future PM peak hour traffic conditions with the proposed hospital expansion.

The previously discussed capacity analysis procedures were utilized to determine the volume to capacity relationships and service level characteristics for the study locations. The seven key intersections evaluated in this traffic report were selected based on the traffic impact criteria of the City of Ventura and the County of Ventura.

b. Significance Thresholds. The City of Ventura traffic impact criteria was used to assess the significance of the potential traffic impacts associated with the proposed project at City intersections. This criteria is summarized in the Table 5.3-4.

Table 5.3-4. City of Ventura Traffic Impact Criteria

Intersection Level of Service (including Project Traffic)	Peak Hour Project Trips Added to Critical Movements
LOS A	> 150
LOS B	> 75
LOS C	> 45
LOS D	> 15
LOS E	> 10
LOS F	> 5

Per City of Ventura Guidelines, the following scenarios are those for which LOS calculations have been performed:

- 1) Existing Traffic Conditions
- 2) Existing plus VCMC Project Traffic without mitigation
- 3) Condition (2) with mitigation (if necessary)
- 4) Existing plus VCMC Project Traffic plus Cumulative Traffic without mitigation
- 5) Condition (4) with mitigation (if necessary)

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The County of Ventura traffic impact criteria obtained from the *Guidelines for Preparation of Environmental Assessments for Public Roads and Highway Levels of Service* are as follows:

- **Impact Criteria:** A project that would result in a 10 percent or more of the total project traffic and one or more vehicle trips during the peak hour on a (County) road segment or intersection, will be considered to have an impact on that road segment or intersection's traffic flow.
- **Significance Criteria:**
 1. A project that would have an impact on a road segment or intersection that is currently operating at a less than acceptable Level of Service (Policy 4.2.2-3 of the County General Plan) will be considered to have a significant impact.
 2. A project that would have an impact on a road segment or intersection that is currently operating at an acceptable Level of Service, where cumulative traffic impacts would result in a Level of Service falling below an acceptable level (Policy 4.2.2-4 of the County General Plan), will be considered to have a significant impact.

The County criteria were used to determine if the traffic generated by the VCMC project would impact any facility which is part of the Regional Road Network (i.e., U.S. 101 Freeway, S.R. 126 Freeway) or under the jurisdiction of the County. Evaluation of VCMC project traffic distribution shows that 10 percent of forecast PM peak hour project traffic will not be generated onto any County road segment/intersection or facility which is part of the Regional Road Network. Thus, based on County Guidelines, no analysis of any County roadway facilities is required. County of Ventura Transportation Department Staff concurs with this conclusion.

5.3.2.2 Project Impacts

a. Proposed Project Traffic Generation. The trip generation forecast for the proposed hospital expansion is based on trip generation rates developed by City of Ventura staff. The trip generation rates were based on existing Medical Center square-footage (398,157 SF) and the number of employees (1,016) currently arriving/departing the hospital during the peak hours.

Based on calculations by City staff, the average daily traffic rate for the VCMC is 10.2 trip ends per thousand square feet (10.2 TE/1000 SF), with a PM peak hour trip generation rate of 1.02 trip ends per thousand square feet (1.02 TE/1000 SF). The directional split for VCMC traffic during the PM peak hour is 38 percent inbound, 62 percent outbound. The assumptions used by City staff to obtain these rates are summarized in Appendix 5.3.

5.3 Transportation and Circulation

Table 5.3-5 shows the trip generation rates used in evaluating the impact of the VCMC Expansion, and presents the forecast PM peak hour and daily project traffic volumes for a "typical" weekday. As shown, the forecast for VCMC expansion results in 640 additional trips on a daily basis (320 inbound, 320 outbound), with 64 trips generated during the PM peak hour (24 entering, 40 exiting).

Table 5.3-5. Project Traffic Generation Forecast

Description	PM Peak Hour			Daily 2-Way
	Inbound	Outbound	Total	
Generation Factors:^a				
Hospital (trip ends/1000 SF)	0.39	0.63	1.02	10.2
Generation Forecasts:				
VCMC Expansion ^b (62,115 SF)	24	40	64	640

^a Daily and PM peak hour trip generation rates were developed by City of San Buenaventura staff. The assumptions used by City Staff to develop these rates are summarized in Appendix C.

^b The Ventura County Medical Center Expansion project consists of approximately 144,003 square-feet of new construction in four new buildings. However, the expansion also includes the demolition or removal of 81,888 SF of existing facilities, thus resulting in a net increase in medical center floor area of 62,115 SF.

b. Proposed Project Traffic Distribution and Assignment. The regional traffic distribution pattern for the VCMC expansion is presented in Figure 5.3-2. With the site envisioned to have a combination of local and sub-regional attraction, project traffic volumes in and out of the site have been distributed and assigned to the adjacent street system based upon several considerations: 1) the site's proximity to major traffic carriers (e.g., U.S. 101 Freeway); 2) expected localized traffic flow patterns based on adjacent street channelization and presence of traffic signals; 3) access/egress availability at site driveways on Hillmont and Loma Vista; and 4) existing peak hour turning movement counts at the Hillmont/Loma Vista and Hillmont/Foothill intersections. The City's traffic model runs completed for the project were also used to define the distribution patterns within the City.

Figure 5.3-3 displays the net added PM peak hour project traffic volumes for the VCMC Expansion Project at adjacent intersections and shows the daily project traffic assignments on the key roadways in the study area.

Figure 5.3-4 shows total existing traffic plus VCMC project traffic at the seven study intersections. Existing plus project ADT volumes are also shown in Figure 5.3-4.

Table 2.2.1 shows the proposed project area and is intended to show the extent of the project. The project area is shown in Figure 2.2.1. The project area is shown in Figure 2.2.1. The project area is shown in Figure 2.2.1.

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Table 2.2.1. Project Area

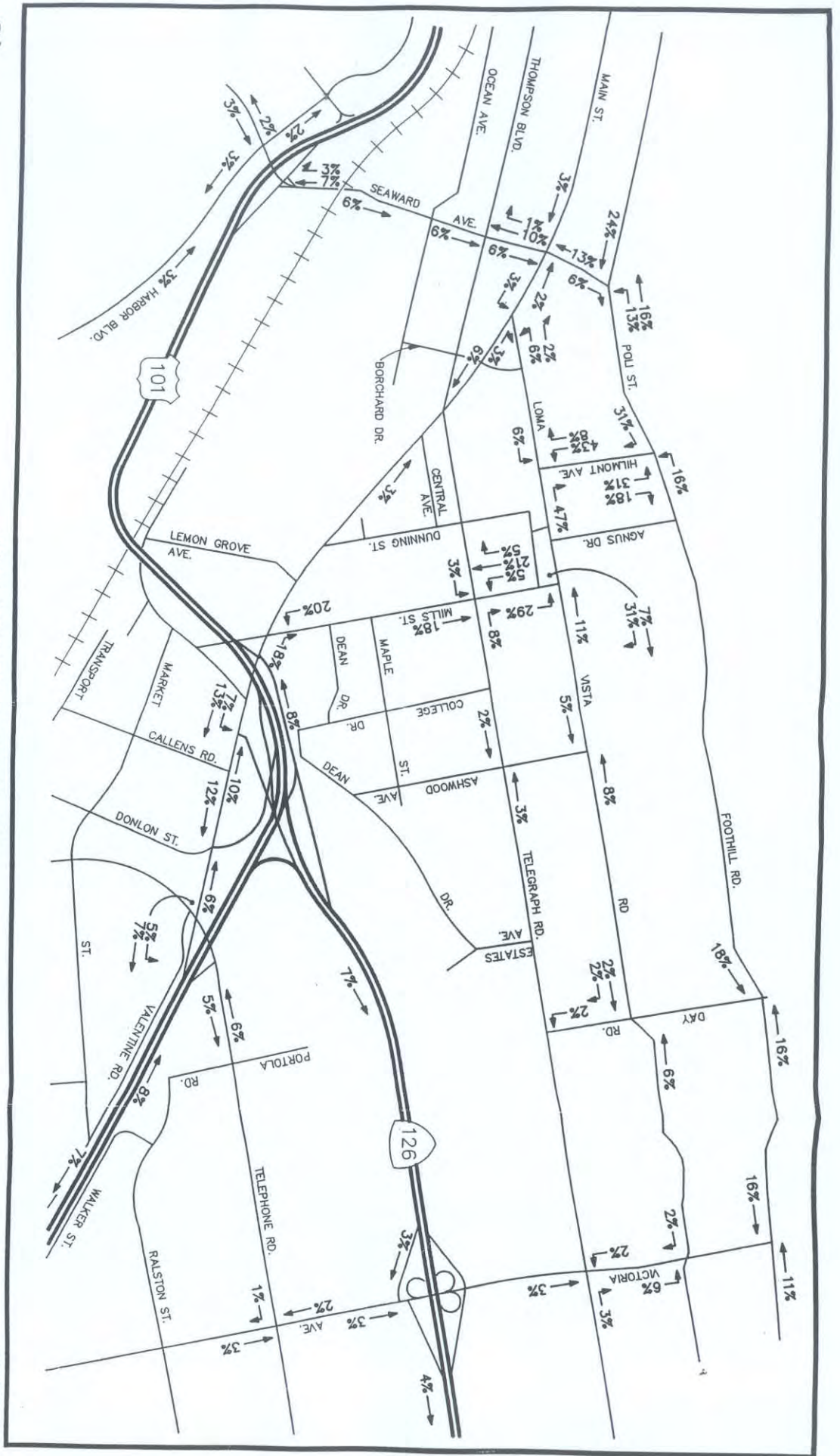
Project Area	Area (Acres)	Area (Square Feet)	Area (Square Meters)	Area (Square Kilometers)
Project Area	100	10,000,000	4,000,000	4
Project Area	100	10,000,000	4,000,000	4

The project area is shown in Figure 2.2.1. The project area is shown in Figure 2.2.1. The project area is shown in Figure 2.2.1. The project area is shown in Figure 2.2.1. The project area is shown in Figure 2.2.1.

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SOURCE: DISTRIBUTION PATTERN BASED ON
CITY OF SAN BUENAVENTURA
TRAFFIC MODEL

FIGURE 5.3-2



SCHMATIC
NOT TO SCALE

Linscott, Low & Greenspan, Engineers

5.3-11

VCMC PROJECT TRAFFIC
DISTRIBUTION PATTERN
VENTURA COUNTY MEDICAL CENTER



TO THE STATE OF TEXAS
COUNTY OF [illegible]

[illegible]

[illegible]

000372

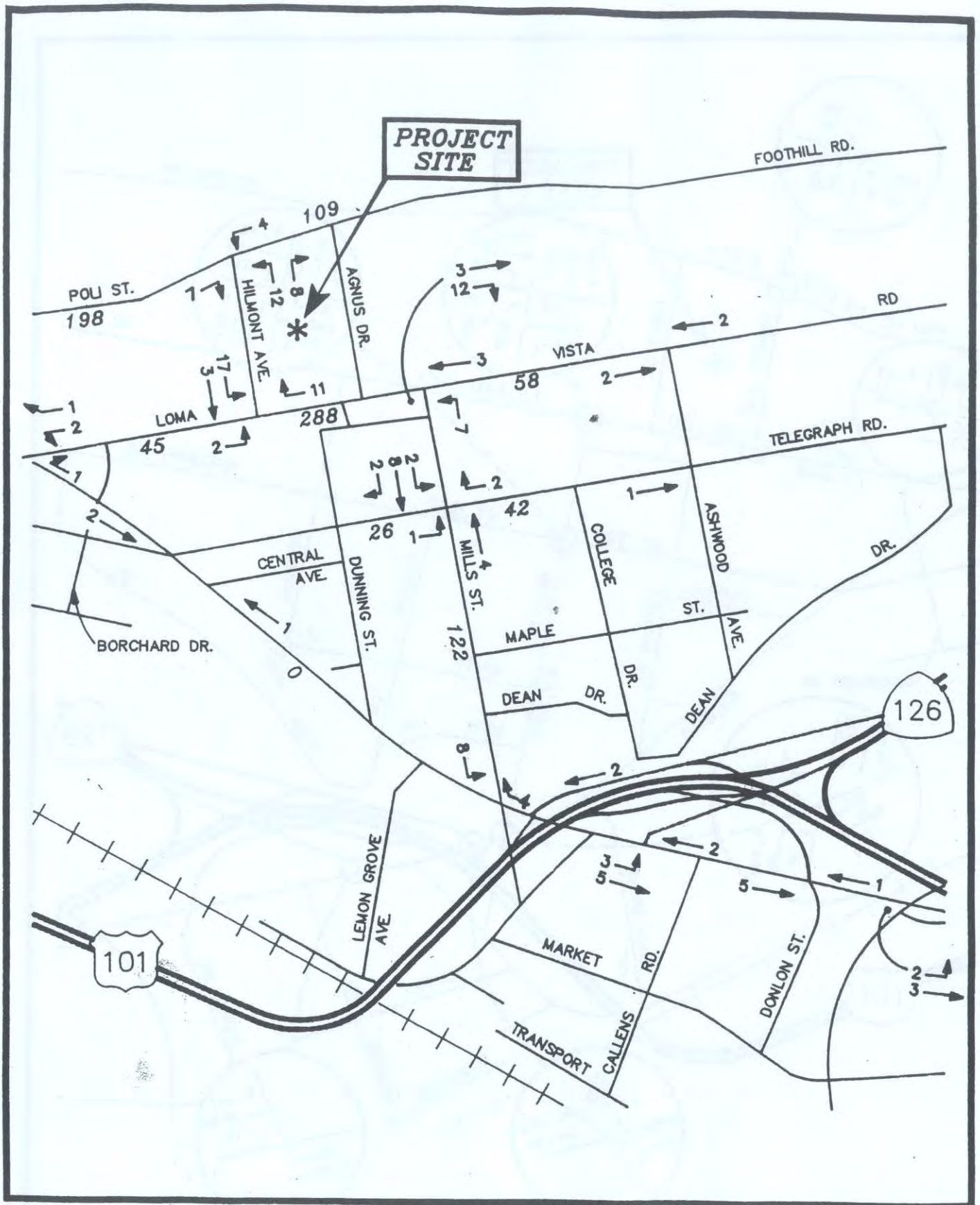


FIGURE 5.3-3

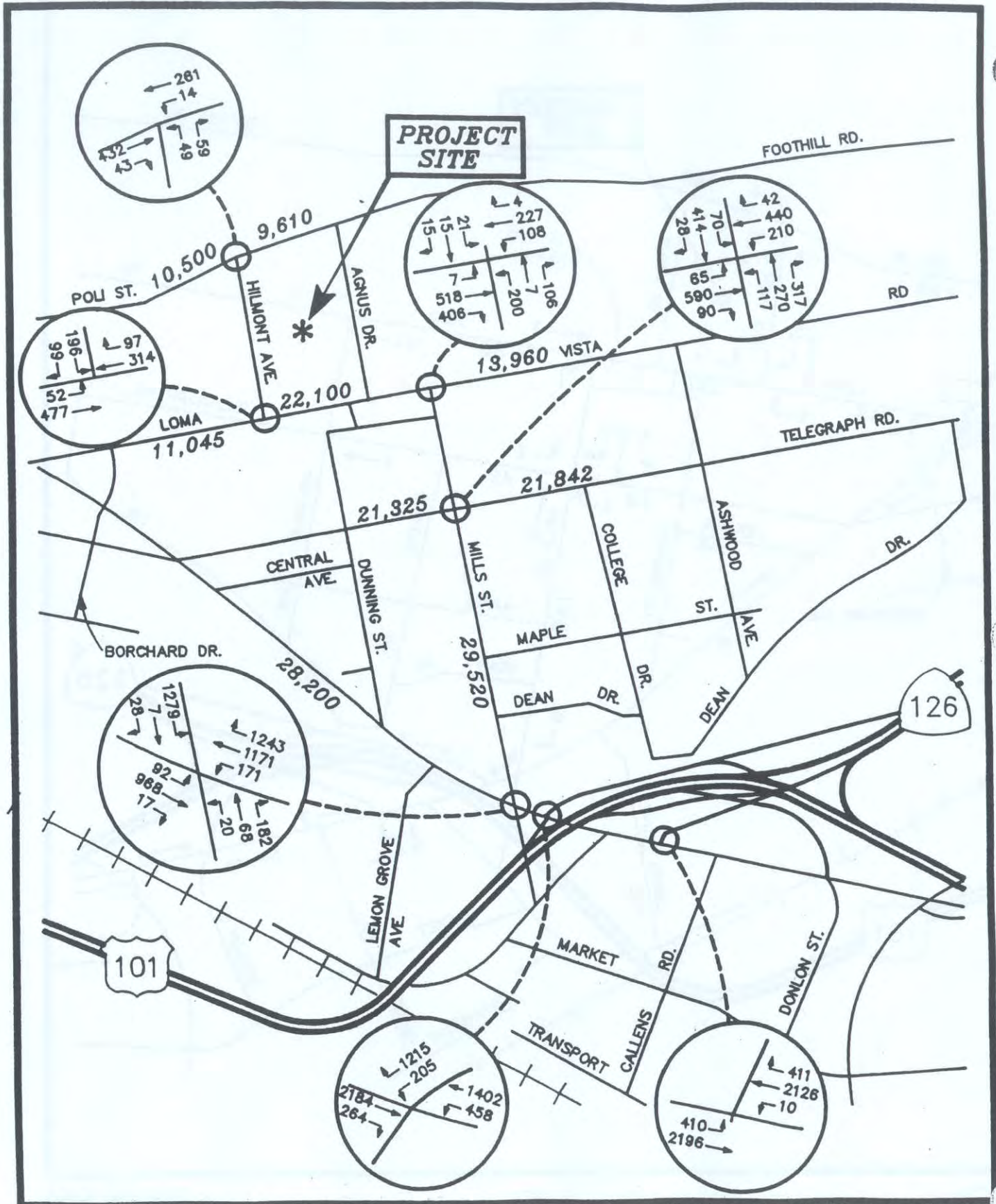
KEY

← XX = PM PEAK HOUR TRAFFIC VOLUMES
 XX,XXX = AVERAGE DAILY TRAFFIC VOLUMES



000373

VCMC PROJECT TRAFFIC



KEY

← XX = PM PEAK HOUR TRAFFIC VOLUMES
 XX,XXX = AVERAGE DAILY TRAFFIC VOLUMES

000374
 477

FIGURE 5.3-4

EXISTING TRAFFIC PLUS
 PROJECT TRAFFIC

5.3 Transportation and Circulation

c. Cumulative Area Projects and Traffic Characteristics

1. *Cumulative Project Trip Generation Forecast.* The traffic characteristics of 30 planned and/or approved projects in the vicinity of the VCMC campus have been evaluated as part of the local area cumulative development setting. The project list is based on the City of Ventura's pending projects list. These projects and associated trip generation forecasts are summarized in Table 5.3-6. The locations of these projects are shown in Figure 5.3-5.

Review of Table 5.3-6 shows that total cumulative traffic generation is estimated at approximately 24,155 two-way trips per day, with 2,557 trip generated during the PM peak hour (1,117 inbound, 1,440 outbound).

In order to remain consistent with previous traffic studies prepared for these projects, specifically the Buenaventura Mall Expansion EIR Traffic Study, and to account for regional traffic growth outside the study area, an annual growth rate of 1.5 percent (to the year 1997) was applied to the existing traffic volumes at the seven key intersections. This annual traffic growth rate also was assumed to account for pending projects inside the study area that have yet to submit formal development applications to the City.

2. *Cumulative Project Trip Distribution and Assignment.* The daily and PM peak hour traffic volumes for the cumulative projects were distributed and assigned to the study intersections and area roadways according to the methodologies contained in previous traffic studies and EIRs prepared for the noted residential and commercial projects. The traffic distribution patterns for these projects were extracted from the Traffic/Circulation section of *Draft Environmental Impact Report for the Buenaventura Mall Expansion/Renovation Project*, dated April 1993.

Figure 5.3-6 presents future background PM peak hour and daily traffic volumes at the seven key intersections and area roadways evaluated in the study area. Figure 5.3-7 illustrates forecast future background conditions with the inclusion of VCMC project traffic.

d. Peak Hour Intersection Capacity Analysis

1. *Signalized Intersection Analysis.* Table 5.3-7 summarizes the PM peak hour Levels of Service for the six key signalized intersections. The first column of values (ICU/LOS) in Table 5.3-7 presents a summary of existing PM peak hour traffic conditions (which were also presented in Table 5.3-3).

The second column lists the existing plus VCMC project conditions based on existing intersection geometry. The third column shows the added PM peak hour project trips to the critical movements of the study intersections. The fourth column indicates whether the traffic associated with the VCMC expansion will have a significant impact based on City impact criteria.

5.3 Transportation and Circulation

Table 5.3-6. Cumulative Project Traffic Generation Forecast

Map # - Project	Land Use	Size/Units	P.M. PEAK HOUR				DAILY 2-WAY	
			Rate	In	Out	Total	Rate	Trips
Residential								
1. RS-16	Single Family	3 DU	1.01	2	1	3	9.5	29
2. RS-14	Single Family	3 DU	1.01	2	1	3	9.5	29
3. RS-51	Single Family	3 DU	1.01	2	1	3	9.5	29
14. RS-69	Single Family	6 DU	1.01	4	2	6	9.5	57
15. RS-71	Single Family	21 DU	1.01	14	7	21	9.5	200
16. RC-17	Condominiums	98 DU	0.55	38	16	54	5.9	578
20. RA-77	Apartments	104 DU	0.63	46	20	66	6.5	676
Commercial								
22. C-159D	Office	85.864 KSF	1.60	27	110	137	12.2	1,048
23. C-239C	Auto Dealer	3.512 KSF	2.60	4	5	9	47.9	168
25. C-266	Office	86.240 KSF	1.60	28	110	138	12.2	1,052
27. C-280	Office	61.750 KSF	1.60	20	79	99	12.2	753
29. C-288	Office	9.798 KSF	2.80	5	22	27	20.3	199
30. C-290	Office	18.055 KSF	2.80	10	41	51	20.3	367
31. C-293	High-Turnover Rest.	0.706 KSF	16.30	6	6	12	205.4	145
33. C-296	Retail	50.500 KSF	4.90	148	99	247	40.7	2,055
34. C-297	Car Wash	2 Stalls	5.00	4	6	10	108.0	216
35. NA	Quality Restaurant	0.573 KSF	7.70	3	1	4	96.5	55
36. NA	Savings & Loan	9.832 KSF	6.80	27	40	67	74.1	719
37. NA	Medical Office	1.210 KSF	4.10	2	3	5	34.2	41
53. NA	Buenaventura Mall ^b	540.562 KSF	NA	662	662	1,324	NA	14,165
Industrial								
38. NA	Office/R&D	60.000 KSF	1.10	7	59	66	7.7	462
39. IND-3Y,3Z,AB	Industrial	32.505 KSF	0.70	8	14	32	1.5	49
39. IND-3AC,3AD	Industrial	26.513 KSF	0.70	8	11	19	1.5	39
39. NA	Warehouse	25.000 KSF	0.60	6	9	15	4.0	100
39. NA	Industrial	8.390 KSF	0.70	2	4	6	1.5	13
40. IND-15W	Industrial	20.528 KSF	0.70	6	8	14	1.5	31
41. NA	Industrial	31.238 KSF	0.70	4	18	22	1.5	47
41. NA	Office	63.796 KSF	1.60	20	82	102	12.2	778
42. IND-120	Warehouse	1.300 KSF	0.60	0	1	1	4.0	5
43. NA	Industrial ^c	NA	NA	0	0	0	NA	0
Institutional								
44. INS-17	Museum ^d	0.65 ACRES		2	2	4	NA	40
TOTAL CUMULATIVE TRIP GENERATION					1,117	1,440	2,577	24,155

^a Refer to Exhibit 5 for locations.

^b Trip generation for the Mall Expansion/Renovation is based on the Draft EIR for the Buenaventura Mall Expansion/Renovation Project.

^c Transmission tower assumed not to result in daily or P.M. peak hour trips.

^d Trip generation for the Dudley House Restoration Project was based on discussions with Goleta Stow Museum Staff.

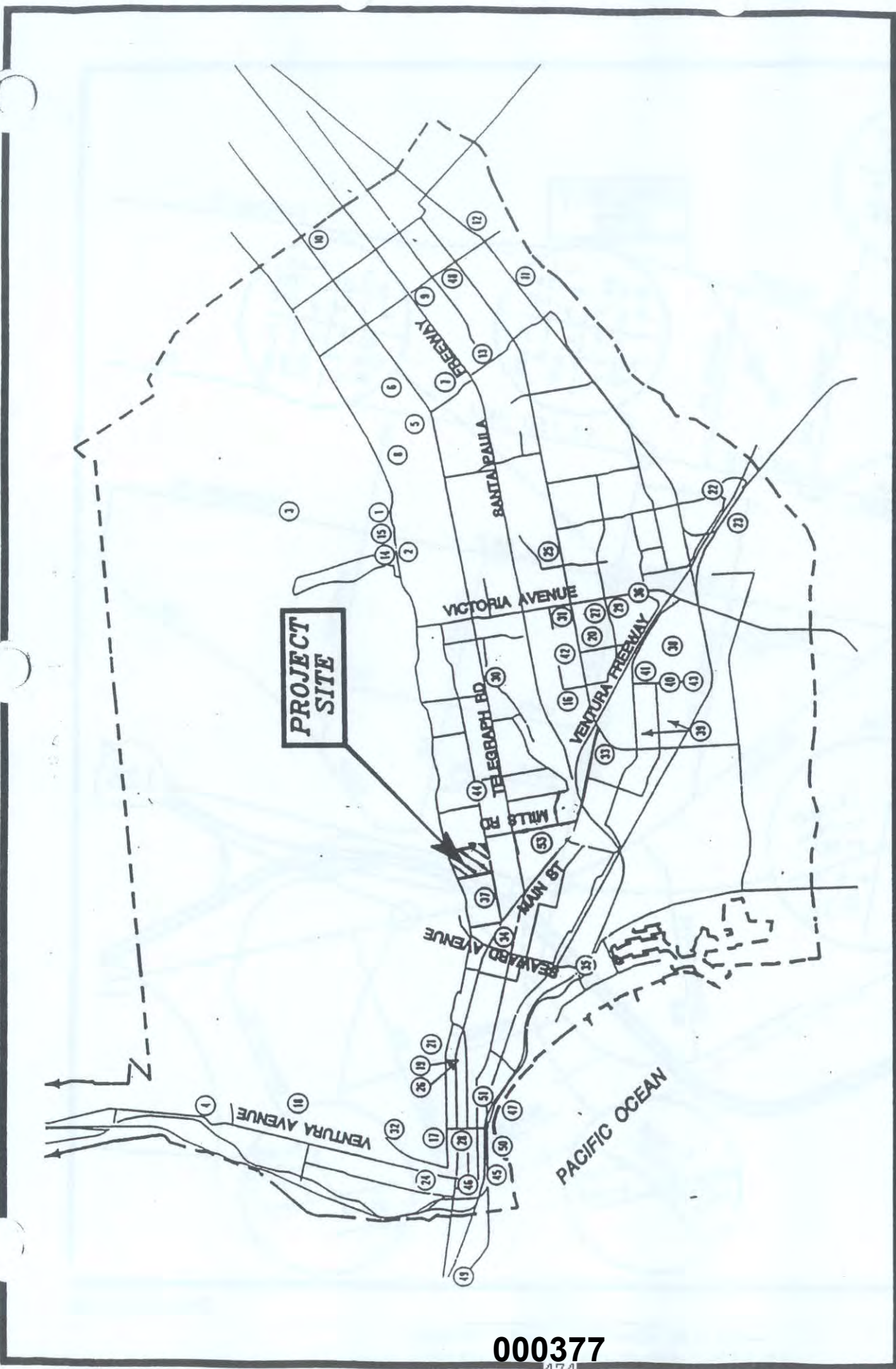


FIGURE 5.3-5

SOURCE: City of Buena Ventura

CITY OF BUENAVENTURA
 CUMULATIVE PROJECTS LOCATION MAP
 VENTURA COUNTY MEDICAL CENTER

SCHEMATIC
 NOT TO SCALE
 NORTH

Linscott, Law & Greenspan, Engineers

000377
 474

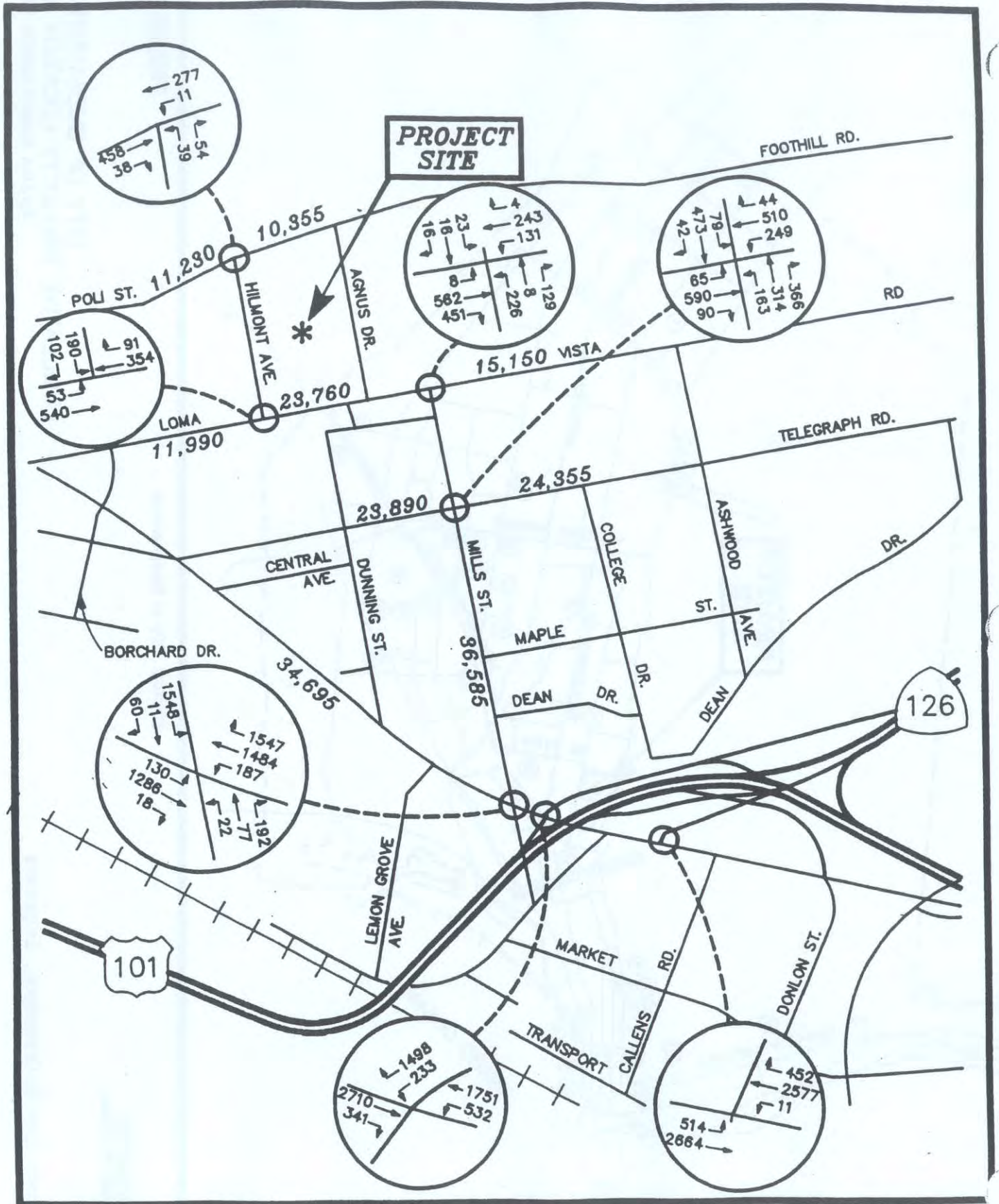


FIGURE 5.3-6



KEY
 ← XX = PM PEAK HOUR TRAFFIC VOLUMES
 XX,XXX = AVERAGE DAILY TRAFFIC VOLUMES
 473

000378

FUTURE TRAFFIC VOLUMES

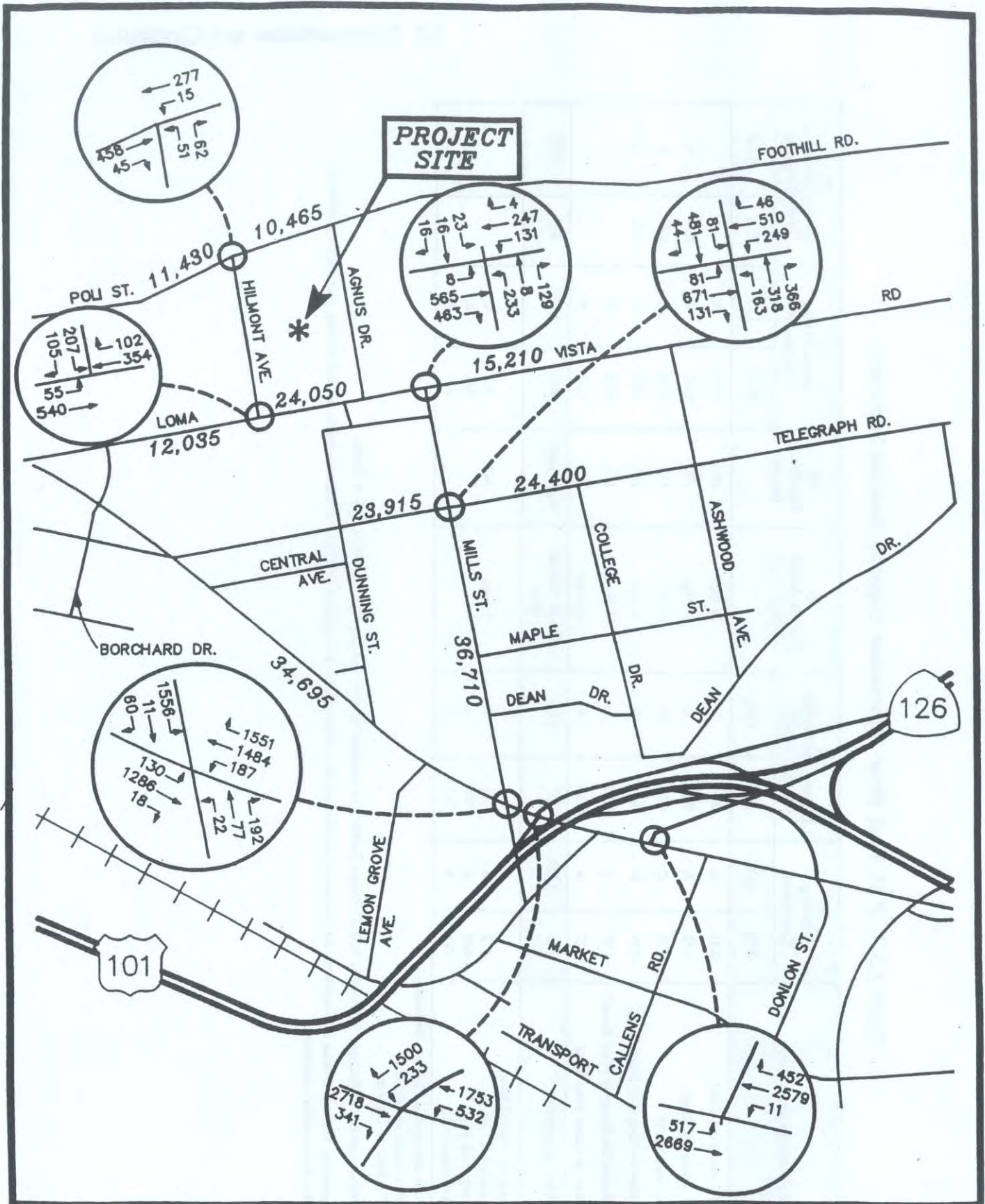


FIGURE 5.3-7



NORTH

KEY
 ← XX = PM PEAK HOUR TRAFFIC VOLUMES
 XX,XXX = AVERAGE DAILY TRAFFIC VOLUMES

000379

FUTURE TRAFFIC VOLUMES
 WITH VCMC PROJECT TRAFFIC
 VENTURA COUNTY MEDICAL CENTER

5.3 Transportation and Circulation

Table 5.3-7. P.M. Peak Hour Intersection Capacity Analysis Summary

Key Signalized Intersections	(1) Existing Conditions		(2) Existing plus VCMC Project Traffic		(3) Project-Added Critical Trips	(4) Significant Impacts	(5) Future Traffic Conditions ^a		(6) Future Conditions With Mitigation	
	ICU	LOS	ICU	LOS			ICU	LOS	ICU	LOS
Mills Road @ Loma Vista Road	0.42	A	0.44	A	22 trips	NO	0.49	A		
Mills Road @ Telegraph Road	0.52	A	0.52	A	6 trips	NO	0.62	B	0.54	A
Mills Road @ Main Street ^b	0.75	C	0.75	C	12 trips	NO	0.95	E	0.80	C
U.S. 101 Northbound Ramps @ Main Street ^b	0.87	D	0.88	D	8 trips	NO	1.05	F	0.81	D
S.R. 126 Eastbound On-Ramp @ Main Street ^b	0.57	A	0.57	A	5 trips	NO	0.70	B		
Hillmont Avenue @ Loma Vista Road	0.27	A	0.28	A	30 trips	NO	0.30	A		
Key Unsignalized Intersection	RC	LOS	RC	LOS	Added Critical trips	Sign. Imp.	RC	LOS	RC	LOS
Hillmont Avenue @ Foothill Road Northbound Left	312	B	293	C	31 trips	NO	265	C		
Northbound Right	608	A	596	A			593	A		
Westbound Left	728	A	718	A			694	A		

Note: ICU = Intersection Capacity Utilization
 LOS = Level of Service
 RC = Reserve Capacity

^a Future Conditions consists of Existing Traffic plus VCMC Project Traffic plus Ambient Growth Traffic plus Cumulative Project Traffic.

^b When the proximity with one another is considered, the combined operation of these intersections are considered LOS D for existing conditions and existing plus project conditions, and LOS E for future traffic conditions.

5.3 Transportation and Circulation

The fifth column of Table 5.3-7 shows the expected service level conditions with the addition of ambient traffic growth and traffic generated by cumulative projects. The sixth column indicates the forecast operating conditions with intersection improvements (mitigation) recommended to achieve an acceptable LOS, if required.

As previously presented in Table 5.3-3, review of this table indicates that existing peak hour PM peak hour operating conditions are within satisfactory ranges based on City's adopted LOS standards.

Review of the ICU/LOS values shown in Column 2 of Table 5.3-7 show that traffic associated with the VCMC expansion will have no significant impact on the operating conditions of the six key signalized intersections. Based on the significance thresholds previously presented in Table 5.3-6, the added PM peak hour project trips to the critical movements of the six study intersections will not have an adverse impact. All six key signalized intersections are expected to operate at an acceptable service level.

An analysis of future traffic conditions indicates that the combinations of ambient traffic growth and cumulative project traffic will deteriorate the PM peak hour operating conditions at the Mills/Main and U.S. 101 Northbound Ramps/Main intersections to an unacceptable LOS. The Mills/Main intersection is forecast to operate at LOS E with an ICU value of 0.95. The U.S. 101 Northbound Ramps/Main intersection is expected to operate at LOS F. Ambient traffic growth and cumulative project traffic are not expected to result in any changes to the existing service levels at the remaining four key intersections.

However, as previously noted, the proximity of the Main/Mills, U.S. 101 Northbound Ramps/Main and S.R. 126 Eastbound On-ramp/Main intersections to one another produce a situation where the combined operation is a consideration. Similar to Main/Mills intersection, field observations show that the existing westbound left-turn lane volumes at the U.S. 101 Northbound Ramps/Main intersection are not fully served by the green time and queues back up into the through lane, causing congestion at the S.R. 126 On-Ramp/Main intersection. On that basis, the S.R. 126 Eastbound On-Ramp/Main intersection will effectively operate at LOS D.

To offset the impact of ambient traffic, cumulative project traffic, as well as proposed project traffic, intersection improvements (mitigation measures) at the Mills/Main and U.S. 101 Northbound Ramps/Main intersections are required. The implementation of these improvements, which are discussed in the following section, will improve the forecast service levels to an acceptable LOS, with the Mills/Main and U.S. 101 Northbound Ramps/Main intersections expected to operate at LOS C and LOS D, respectively. These improvements should also improve traffic flow through the S.R. 126 On-Ramp/Main intersection.

Although the forecast traffic conditions at the Mills/Telegraph intersection is considered acceptable (0.62/B), the addition of cumulative project traffic during the PM peak hour would worsen the existing westbound left-turning queuing problem. The addition of a second westbound left-turn lane on Telegraph Road would mitigate this problem.

5.3 Transportation and Circulation

2. *Unsignalized Intersection Analysis.* The PM peak hour capacity analysis for the Hillmont/Foothill unsignalized intersection is summarized on the lower portion of Table 5.3-7. This key intersection currently operates at LOS C or better during PM peak hour. Further, as shown in Table 5.3-7, no significant change in the existing service levels are forecast with the addition of VCMC project traffic, ambient traffic growth or cumulative project traffic.

5.3.3 Mitigation Measures

Although project implementation would not in itself result in any significant traffic impacts, this traffic impact analysis reveals that future traffic volumes will cause poor operating conditions at the Mills/Main, U.S. 101 Northbound Ramps/Main, and Mills/Telegraph intersections. For these three key intersections, this report identifies improvements originally recommended in the *Draft Environmental Impact Report for the Buena Ventura Mall Expansion/Renovation Project*, dated April 1993, that change the intersection geometry to increase capacity. The capacity improvements involve roadway widening and/or restriping lanes in order to reconfigure or add lanes to the various approaches of the intersection. The proposed improvements are expected to offset the impact of future traffic and return Levels of Service to an acceptable range.

- **Mills Road @ Main Street.** Widen westbound approach on Main Street to provide two left-turn lane, three through lanes, and two exclusive right-turn lanes. (Note: This improvement would require the U.S. 101-S.R. 126 off-ramp be widened to three lanes.)
- **U.S. 101 Northbound Ramps @ Main Street.¹** Restripe the westbound approach to provide dual-left turn lanes on Main Street and widen the U.S. 101 on-ramp to provide an additional receiving lane to accommodate this improvement. Widen U.S. 101-S.R. 126 off-ramp to provide dual left-turn lanes and three right-turn lanes to Main Street (see above).
- **Mills Road @ Telegraph Road.** Widen the westbound approach on Telegraph to provide dual left-turn lanes, two through lanes and one exclusive right-turn lane.

As a facility administered by a public agency, the Ventura County Medical Center would not currently be required to participate in the City's Traffic Mitigation Fee Program. The VCMC may, however, be required to contribute to the program in the future. In addition, if any portion of the campus is leased to a private company in the future, that company would be expected to pay its "fair-share" for the cost of these improvements based on its contribution to cumulative impacts to the local circulation system. No further mitigation is necessary.

5.3 Transportation and Circulation

5.3.4 Residual Impacts

Project impacts would be less than significant prior to mitigation. Project implementation would not significantly affect any portion of the local circulation system.

¹ Intersection improvements are based on preliminary street improvement plans developed by the City of San Buenaventura.

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5.4 AIR QUALITY

This section analyzes localized air quality impacts associated with on site construction activity and with the proposed parking structure. Because regional impacts resulting from increased traffic and energy consumption were found to be less than significant in the Initial Study that was circulated with the May 18, 1993 NOP, such impacts are not analyzed herein.

5.4.1 Setting

5.4.1.1 Regional Setting

a. General Climate and Meteorology. The proposed project is located in the western portion of the Oxnard Plain Airshed, a sub-basin of the South Central Coast Air Basin. The Airshed is characterized by cool winters and warm, dry summers tempered by cooling sea breezes. Summer, spring and fall weather is generally a result of the movement and intensity of the semi-permanent high pressure area located several hundred miles to the west. Marine influences generally predominate during this period and cause afternoon onshore flow and evening offshore flow. Winter weather is generally a result of the size and location of low pressure weather systems originating in the north Pacific Ocean.

The nearest climatic data station to the proposed project site is the Ventura weather station. However, the Ventura station does not monitor temperature. The nearest station with long-term temperature data is the Oxnard station. The average daily maximum temperature recorded at the Oxnard station is 70.7 degrees Fahrenheit (°F) for the period of 1951 to 1980 (NOAA, 1982). The hottest month is September, with average maximum daily temperatures (1951-1980) of 76.0°F. The coolest month is January, with an average daily minimum temperature (1951-1980) of 43.5°F. The average annual precipitation recorded at the Ventura station for the same period is 14.54 inches. Approximately 95 percent of this precipitation occurs from November through April.

Ventura County winds are dominated by a daily land-sea breeze cycle, which is broken only by occasional winter storms and infrequent strong Santa Ana winds from the northeast. The sea breeze is generally stronger than the land breeze and results in a net flow from west to east. Westerly sea breezes carry pollutants generated in the coastal areas into the inland valleys where dispersion is restricted. The presence of temperature inversions and westerly transport result in meteorological conditions conducive to ozone formation in the inland valleys.

The project site is near the coast where the majority of ozone precursor emission sources are located. Typically, the net westerly wind flow results in the transport of offshore and coastal emissions to receptors to the east. Due to relatively high wind speeds and net westerly wind flow, high ozone concentrations in the project area are rare.

b. Air Monitoring Network. The air quality of Ventura County is monitored by a network of air monitoring stations operated by the California Air Resources Board (CARB) and

5.4 Air Quality

the Ventura County Air Pollution Control District (APCD). The air monitoring network includes nine stations throughout the County. The closest station, and that most representative of the air quality of the project site, is the Main Street, Ventura station, located approximately 2.5 miles west of the project site.

The Main Street, Ventura station only monitors particulate matter less than 10 microns (PM_{10}). Other pollutant data (ozone, carbon monoxide, nitrogen dioxide) is taken from the El Rio station, which is located approximately 6 miles east of the project site. Pollutant concentrations monitored at the El Rio station are generally representative of the project site since, like the project site, they are east of both U.S. Highway 101 and coastal emission sources.

c. Air Quality Standards. Air quality standards are specific concentrations of pollutants that are used as thresholds to protect public health and the public welfare. The U.S. Environmental Protection Agency (EPA) has developed two sets of standards: one to provide an adequate margin of safety to protect human health and the second to protect the public welfare from any known or anticipated adverse effects. At this time, sulfur dioxide is the only pollutant for which the two standards differ.

The CARB has developed air quality standards which are generally lower in concentration than the Federal standards. California standards exist for ozone, carbon monoxide, PM_{10} , visibility, sulfates, lead, hydrogen sulfide and vinyl chloride. Table 5.4-1 lists the current State and Federal air quality standards.

d. Effects of Air Pollution. The primary chemical compounds that are considered pollutants which are emitted into or formed in the atmosphere from precursors include ozone, oxides of nitrogen, sulfur dioxide, hydrocarbons, carbon monoxide and particulate matter.

Ozone is formed in the atmosphere through a complex series of chemical reactions generally requiring light as an energy source. Ozone is a pungent, colorless gas and a strong irritant which attacks the respiratory system. Respiratory and cardiovascular diseases are aggravated by exposure to ozone. Healthy persons exposed to high concentrations of ozone may experience nausea, dizziness and burning in the chest. Ozone also damages crops and other vegetation.

Oxides of nitrogen (NO_x) which are considered pollutants include nitric oxide (NO) and nitrogen dioxide (NO_2). NO is colorless and odorless and is generally formed by combustion processes which combine atmospheric oxygen and nitrogen. NO_2 is a reddish-brown irritating gas formed by the combination of NO and oxygen in the atmosphere or at the emission source. Both NO and NO_2 are considered ozone precursors because they react with hydrocarbons and oxygen to produce ozone. Exposure to NO_2 may increase the potential for respiratory infections in children and cause difficulty in breathing among healthy persons and especially asthmatics.

Table 5.4-1. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ^a	National Standards ^b	
		Concentration ^c	Primary ^d	Secondary ^e
Ozone	1-hour	0.09 ppm (180 µg/m ³)	0.12 ppm (235 µg/m ³)	Same as Primary Standard
Carbon Monoxide	8-hour	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)	Same as Primary Standard
	1-hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	Same as Primary Standard
Nitrogen Dioxide	Annual Average	---	0.053 ppm (100 µg/m ³)	Same as Primary Standard
	1-hour	0.25 ppm (470 µg/m ³)	---	Same as Primary Standard
Sulfur Dioxide	Annual Average	---	80 µg/m ³ (0.03 ppm)	---
	24-hour	0.04 ppm (105 µg/m ³)	365 µg/m ³ (0.14 ppm)	---
	3-hour	---	---	1,300 µg/m ³
	1-hour	0.25 ppm (655 µg/m ³)	---	---
Suspended Particulate Matter Less Than 10 Microns Diameter (PM ₁₀)	Annual Geometric Mean	30 µg/m ³	---	---
	Annual Arithmetic Mean	---	50 µg/m ³	Same as Primary Standard
	24-hour	50 µg/m ³	150 µg/m ³	Same as Primary Standard
Sulfates	24-hour	25 µg/m ³	---	---
Lead	30-day Average	1.5 µg/m ³	---	---
	Calendar Quarter	---	1.5 µg/m ³	Same as Primary Standard
Hydrogen Sulfide	1-hour	0.03 ppm (42 µg/m ³)	---	---
Vinyl Chloride (Chloroethene)	24-hour	0.010 ppm (26 µg/m ³)	---	---
Visibility Reducing Particles ^f	1 Observation	In sufficient amount to produce an extinction coefficient of 0.23 per kilometer due to particles when the relative humidity is less than 70 percent.	---	---

^a California standards for ozone, carbon monoxide, sulfur dioxide (1-hour), nitrogen dioxide, and particulate matter (PM₁₀) are values that are not to be exceeded. The sulfate, lead, hydrogen sulfide, vinyl chloride, and visibility-reducing particles standards are not to be equaled or exceeded.

^b National standards, other than ozone and those based on annual arithmetic means, are not to be exceeded more than once a year. The ozone standard is attained when the expected number of days per calendar year with maximum-hourly average concentrations above the standard is equal to or less than 1.

^c Concentrations expressed first in units promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 mm of Hg (1,013.2 millibar); ppm in this table refers to ppm by volume, or micromolus of pollutant per mole of gas. µg/m³ = micrograms per cubic meter; mg/m³ = milligrams per cubic meter.

^d National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health. Each state must attain the primary standards no later than 3 years after that state's implementation plan is approved by the Environmental Protection Agency.

^e National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant. Each state must attain the secondary standard within a "reasonable time" after the implementation plan is approved by the EPA.

^f This standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range when the relative humidity is less than 70 percent.

Source: California Air Resources Board 1991. *California Air Quality Data*.

5.4 Air Quality

Sulfur dioxide (SO₂) is a colorless, pungent, irritating gas which affects the upper respiratory tract. Sulfur dioxide may combine with particulate matter and settle in the lungs and cause damage to lung tissues. Sulfur dioxide may combine with water in the atmosphere to form sulfuric acid, which may fall as acid rain and can damage vegetation.

Hydrocarbons include a wide variety of compounds containing hydrogen and carbon. Many hydrocarbons react with NO and NO₂ to form ozone. Generally, ambient hydrocarbon concentrations do not cause adverse health effects directly, but result in ozone formation.

Carbon monoxide (CO) is a colorless, odorless gas generally formed by incomplete combustion of hydrocarbon containing fuels. Carbon monoxide does not irritate the respiratory tract, but does interfere with the ability of blood to carry oxygen to vital tissues.

Particulate matter consists of a wide variety of particle sizes and composition. Generally, particles less than 10 microns (PM₁₀) are considered to be pollutants because they accumulate in the lung tissues and may contain toxic materials that are absorbed into the system.

e. General Air Quality Trends. Two pollutants (ozone and PM₁₀) are of particular interest because State air quality standards for these pollutants are regularly exceeded in Ventura County. Table 5.4-2 lists the monitored maximum concentrations and number of exceedances of State air quality standards for the years 1989, 1990 and 1991. The SO₂ concentrations monitored at the El Rio station during this period are substantially below the State air quality standards. The ozone concentrations monitored at the El Rio station exceeded the State standard (0.09 ppm) for a total of 113 hours from 1989 through 1991. The Federal ozone standard (0.12 ppm) was only exceeded for a total of 8 hours at the El Rio station during the same period. PM₁₀ concentrations monitored at the Main Street, Ventura station exceeded the State 24-hour standard for a total of 15 days from 1989 through 1991. The Federal 24-hour PM₁₀ standard was not exceeded at the Main Street, Ventura station during this period.

f. Regulatory Setting. Amendments to the Federal Clean Air Act required each Air Pollution Control District to submit an Air Quality Management Plan (AQMP) for approval by CARB and the EPA. The goal of the AQMP was to reduce pollutant concentrations below the Federal standards. The 1982 Ventura County AQMP failed to demonstrate attainment of the Federal ozone standard by the December 31, 1987, deadline. A 1987 AQMP was subsequently prepared and formally approved in July 1988, but did not predict attainment of the federal ozone standard in the foreseeable future.

Because of the failure of the 1982 AQMP to demonstrate attainment of Federal air quality standards, the Citizens to Preserve the Ojai (CPO) sued the EPA in 1988. The suit contended that the EPA should disapprove the 1982 AQMP, impose a moratorium on the construction of new major sources and major modifications to existing sources of reactive organic compounds (ROC), and prepare a Federal Implementation Plan (FIP) to attain the Federal ozone standard in Ventura County. In March 1989, the CPO and EPA reached a settlement that

Table 5.4-2. Air Quality Standard Exceedances

Ozone - El Rio (ppm)	1989	1990	1991
Worst Hour	0.19	0.12	0.12
Number of State Exceedances (Hours > 0.09 ppm)	56	17	40
Number of Federal Exceedances (Hours > 0.12 ppm)	8	0	0
Carbon Monoxide - El Rio (ppm)			
Worst Hour	3.0	3.0	3.0
Number of State Exceedances (Hours > 20 ppm)	0	0	0
Number of State Exceedances (8 hours > 9 ppm)	0	0	0
Nitrogen Dioxide - El Rio (ppm)			
Worst Hour	0.09	0.10	0.09
Number of State Exceedances (Hours > 0.25 ppm)	0	0	0
PM ₁₀ - Ventura, Main Street (micrograms/cubic meter)			
Worst Sample	66	82	62
Number of State Exceedances (Samples > 50)	9	2	4
Annual Geometric Mean (Standard is 30)	32.8	28.3	29.5
Annual Arithmetic Mean (Standard is 50)	36.1	30.5	31.7

Source: California Air Resources Board, Air Quality Summaries, 1989, 1990, 1991

established a tentative schedule for developing the FIP, which included the development of final rulemaking by February 1992.

However, after adoption of the Federal Clean Air Act Amendments of 1990, the EPA requested court relief from development of FIPs for the Los Angeles, Sacramento, and Ventura County areas. The tentative schedule for completion of the FIP was, therefore, put on hold pending the final outcome of the EPA appeal. The appeal was ultimately rejected by the U.S. Supreme Court in February 1993. Consequently, the EPA must now return to court to establish a binding schedule for developing the FIPs.

The 1990 Amendments to the Federal Clean Air Act require statutory deadlines for attainment of Federal air quality standards. However, guidance for complying with the Amendments has not been released by EPA. The Ventura County APCD is currently preparing a new Federal AQMP to be completed in 1994.

Assembly Bill 2595 (known as the California Clean Air Act) took effect in 1989 with goal of attaining California Air Quality Standards (CAQS) by the earliest practicable date. The Ventura County APCD prepared an AQMP in 1991 to meet the requirements of the California Clean Air Act. The 1991 AQMP was adopted by the Ventura County Board of Supervisors in October 1991 and was approved by CARB in August 1992.

5.4 Air Quality

Recent amendments to the California Clean Air Act have changed the methods by which an area is classified for ozone and CO. Previously, classifications were based on the projected attainment dates indicated in each district's air quality plans. However, in accordance with the amendments, classifications are based upon ambient air monitoring data. Ozone classifications are based on data from 1989 through 1991 and include "moderate", "serious", "severe" and "extreme" designations. CO classifications are based upon data from the 1989-1990 and 1990-1991 winter seasons and include "moderate" and "serious" designations. The Ventura County portion of the South Central Coast Air Basin has been tentatively classified as severe for ozone. The South Central Coast Air Basin has been tentatively classified as in attainment for CO.

The 1991 Ventura County AQMP does not contain a predicted date of attainment of the State ozone standard. However, it does include stationary source and mobile source control measures that will substantially reduce emissions. New and revised stationary source control measures that should substantially reduce the projected emissions inventory include various coatings rules (paints), consumer products rules (deodorants, hair spray, etc.) and electrical power generating equipment (Rule 59). New and revised mobile source control measures include various trip reduction related measures, requirements regarding the use of clean fuels, revisions to Rule 210, and an indirect source control program for projects which attract large numbers of vehicles (large commercial or residential projects).

The 1991 AQMP does not specifically address attainment of the State PM_{10} standard. However, many of the control measures contained in the 1991 AQMP would result in substantial reductions in PM_{10} emissions.

5.4.1.2 Site-Specific Setting

The regional setting adequately characterizes the air quality of the project site. Existing sources of air pollutant emissions at the VCMC include vehicular movement to and from the site, the water and space heaters, and a 1,000 kilowatt, diesel-fired emergency generator. Installed in 1985, air emissions from the generator have become a source of concern for some residents east of the campus along Agnus Drive. When operating, the generator emits smoke, which contains such pollutants as nitrogen dioxide and particulates. However, because the emergency generator is typically operated for a few hours each month for testing purposes, its air quality impacts are not generally substantial.

As part of an effort to comply with the Ventura County AQMP in the area of overall vehicular trip reduction, the VCMC has prepared and filed a trip reduction plan with the APCD.

5.4.2 Impact Analysis

5.4.2.1 Methodology and Significance Thresholds

The Ventura County APCD has prepared *Guidelines for the Preparation of Air Quality Impact Analyses* (Guidelines). Thresholds of significance are taken from the Guidelines and are listed below:

- Daily emissions exceeding 25 pounds reactive organic compounds (ROC) or oxides of nitrogen (NO_x);
- Causing an exceedance or making a substantial contribution to an exceedance of an ambient air quality standard;
- Projects inconsistent with the Ventura County AQMP and emitting greater than 2 pounds per day ROC or NO_x;
- Directly or indirectly causing the existing population to exceed the population forecasts in the most recently adopted AQMP.

The Ventura County APCD significance thresholds are not applicable to construction emissions since these emissions are only temporary. However, due to the lack of attainment of the ozone and PM₁₀ standards, construction mitigation should be applied to all phases of construction.

Localized impacts associated with the proposed three-level parking structure are considered significant if the increase in CO emissions associated with the structure would result in an exceedance of the federal or state CO standards. Project impacts are also considered significant if the project is found to be inconsistent with the 1991 Ventura County AQMP.

5.4.2.2 Project-Specific Impacts

a. Construction Activity Impacts. Air quality impacts would occur from demolition and construction activities including building demolition, pad construction, parking garage construction, building erection and paving. Heavy equipment and on-road trucks would generate short-term exhaust emissions and fugitive dust. Site preparation emissions are generally much greater than building erection emissions due to the larger size and number of emission sources present. This analysis is based upon a peak day during the construction period. The peak day is expected to occur in 1995 during site preparation for the Ambulatory Care Clinic and parking structure.

Construction equipment assumed to be used for site preparation includes one tracked tractor (Caterpillar D6H), one scraper (Caterpillar 623E) and two wheeled loaders (Caterpillar

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966E). In addition, on-road heavy-duty diesel trucks would be used to transport earth materials offsite. Construction exhaust emissions are calculated using fuel-specific emissions factors from the EPA document *Compilation of Air Pollutant Emission Factors (AP-42, Volume II, 1985)*. Fuel usage of construction equipment was obtained from the Caterpillar Performance Handbook. It is assumed that 1,500 tons per day of earth materials would be exported on a peak day. Based upon a maximum load of 24 tons per truck, this would require 62.5 truck trips per day. It is assumed that the trucks would transport excess earth material to the Bailard Landfill, a round-trip distance of 13 miles. Exhaust emissions generated by construction-related sources would degrade local air quality and may cause or contribute to exceedances of the nitrogen dioxide 1-hour State air quality standard. Peak day construction emissions are presented in Table 5.4-3 and the calculations are documented in Appendix 5.4.

Table 5.4-3. Construction Emissions

Source	Pollutant (Pounds per Day)				
	ROC	CO	NO _x	PM ₁₀	SO ₂
Heavy Equipment	8.4	23.7	77.2	7.3	8.2
On-road Trucks	4.1	12.2	23.0	3.3	5.6
Bulldozing (dust)	0.0	0.0	0.0	451.5	0.0
Batch Drop (dust)	0.0	0.0	0.0	3.1	0.0
Wind Erosion (dust)	0.0	0.0	0.0	105.6	0.0
TOTAL	12.5	35.9	100.2	570.8	13.8

Construction activities would also generate PM₁₀ (fugitive dust). Fugitive dust would be generated by earth-moving activities (bulldozing), batch drops and wind erosion of exposed soils. Bulldozing emissions are calculated using emission factors in EPA AP-42, Section 8.24 and soil silt content from the 1970 *Soil Survey, Ventura Area, California*. Bulldozing emissions calculations assume that one tracked tractor is in full operation during peak day. Bulldozing PM₁₀ emissions are presented in Table 5.4-3.

A batch drop is the process of dumping earth materials onto the soil surface or into a truck. Batch drop emissions are calculated using emission factors in EPA AP-42, Section 11.2.3 and estimated tons per day of materials dumped. To account for batch drops of the wheeled loaders to a stockpile and into trucks, the estimated 1,500 tons per day export value is doubled. Batch drop PM₁₀ emissions are presented in Table 5.4-3.

Wind erosion of exposed soil surfaces is estimated using emission factors from the South Coast Air Quality Management District document *CEQA Air Quality Handbook (1993)*. Wind erosion calculations assume that a maximum of 4 acres of soil surface are exposed during the peak day. Wind erosion emissions are presented in Table 5.4-3.

Construction related PM₁₀ emissions have the potential to cause or substantially contribute to local exceedances of the State PM₁₀ standard and may hinder progress towards

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County attainment of the State PM_{10} standard. In addition, dust generated by construction activities may pose a nuisance to persons living or working near construction sites.

b. Parking Structure Impacts. Traffic-congested intersections and parking garages have the potential to result in high levels of carbon monoxide, known as CO "hot spots." Such "hot spots" are defined as locations where the ambient CO concentrations exceed the State or Federal ambient air quality standards [20 ppm (State) or 35 ppm (Federal) 1-hour]. Sensitive receptors could be adversely affected if these standards were exceeded. Sensitive receptors are generally defined as land uses that are occupied by persons actively exercising or are more sensitive to air pollution including hospitals, nursing homes, schools and parks. CO can be especially dangerous for people with heart disease, anemia, emphysema, asthma and other respiratory ailments.

The project includes a three-level, above-ground parking garage. Multi-level parking garages tend to concentrate vehicle CO emissions in a small area and may cause CO hotspots during the peak hour. A worst-case scenario was selected for analysis:

- Winter evening (50°F);
- Peak hour volumes are 10 percent of daily volumes (see Traffic Study) such that the number of cars leaving during peak hour is 10 percent of the number of parking spaces;
- All vehicles operate under cold start conditions;
- Worst-case model inputs (50 meter mixing height, 0.5 meters per second wind speed, worst-case wind direction, worst hour ambient CO concentration).

The California Department of Transportation CALINE4 Model was used to estimate ambient CO concentrations. The CALINE4 Model was used in the parking lot mode with links stacked above each other to simulate a multi-level parking garage. Traffic volumes of upper levels were added to traffic volumes of lower levels since traffic exiting from upper levels must pass through lower levels. Parking garage plans were not available and the determination of link locations and elevations within the parking structure assumed 500 car capacity (total), 167 cars per level, ramps located in the center of the structure and exits on the north and west sides of the structure.

Receptors selected for analysis include the proposed Ambulatory Clinic to the south (gym room), proposed patient drop-off area, the Juvenile Court building and the nearest residence on Agnus Drive to the east of the proposed parking garage. The boiler and laundry building is located between the proposed parking garage and the residences on Agnus Drive and would tend to disperse CO emissions prior to reaching the residences. The modeling results are presented in Table 5.4-4 and modeling inputs are included in Appendix 5.4. As the table shows, modeled

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CO concentrations are substantially less than the State 1-hour standard (20 ppm). Consequently, local scale impacts of the parking garage are considered less than significant.

Table 5.4-4. Parking Structure Local Scale Impacts

Receptor Description	CO Concentration (ppm)
Ambulatory Care Clinic gym room	3.8
Residence on Agnus Drive	3.6
Patient drop-off area	4.1
Boiler and laundry building	4.0

c. **Consistency with 1991 Air Quality Management Plan.** Consistency with the 1991 AQMP is determined by comparing the population forecasts used to develop the AQMP to the current population in the area of interest. Projects that would cause the local population to exceed the AQMP projection would be considered inconsistent. The proposed project is comprised of medical facilities that would service the existing population and is not expected to induce population growth. Therefore, the project is considered consistent with the 1991 AQMP.

5.4.2.3 Cumulative Impacts

Because they are temporary in nature, construction activity impacts would not contribute to the long-term cumulative degradation of regional air quality. CO impacts associated with the proposed parking would be localized in nature and also would not contribute to significant cumulative effects.

The cumulative vehicle emissions associated with all currently planned projects in the City of Ventura would exceed County significance thresholds. However, because emissions associated with the proposed project would be less than County significance thresholds, the project's contribution to cumulative regional air quality impacts is considered less than significant.

5.4.3 Mitigation Measures

As discussed in Section 3.7 of the Project Description, several methods to reduce air quality impacts associated with construction activity will be incorporated into the project. These include the following:

- Regular ground wetting of graded areas will be conducted during construction to control fugitive dust emissions.
- Grading activities will cease during periods when winds exceed 20 miles per hour averaged over one hour.

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- Material excavated, stockpiled and transported during construction will be wetted regularly.
- Onsite construction vehicle speed will be limited to 15 miles per hour.
- Construction vehicle traffic areas will be regularly wetted.
- Tarping of trucks removing dirt offsite.

5.4.3.1 Additional Construction Activity Measures

The following mitigation measures should be fully implemented in addition to the above methods to reduce ozone precursor emissions and PM₁₀ emissions (fugitive dust) associated with site preparation activities of the proposed project.

- AQ-1 Two-Foot Freeboard.** Trucks transporting earth material offsite shall maintain a minimum 2-foot freeboard.
- AQ-2 Equipment Turnoff.** All diesel-powered equipment should be turned off when not in use for more than 30 minutes and gasoline-powered equipment should be turned off when not in use for more than 5 minutes.
- AQ-3 Daily Watering.** The entire construction area shall be watered twice daily.
- AQ-4 Roadway Sweeping.** Roadways in the vicinity of construction access points shall be swept as necessary to prevent the accumulation of silt.

5.4.3.2 Cumulative Operational Measures

Although project implementation would not in itself significantly impact regional air quality, the following mitigation measures are recommended to reduce the project's contribution to the long-term cumulative degradation of regional air quality.

- AQ-5 Bicycle Racks.** Bicycle racks shall be provided in a convenient location to encourage bicycle use by VCMC employees.
- AQ-6 Bicycle Lanes.** Bicycle lanes shall be constructed to link project bicycle racks to existing Class II bicycle lanes on Loma Vista Road.
- AQ-7 Low Emission Space Heaters.** Space heaters used in all project development shall be low emission designs. Commercial space heaters should be certified by the manufacturer to generate no more than 40 nanograms of NO_x per joule heat output. This would reduce space heating emissions by up to 79 percent (EPA, 1983).

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AQ-8 Maximize Thermal Integrity. All new structures shall maximize thermal integrity through the use of insulation, dual-pane windows, advanced window glazing to reduce heating and cooling requirements and associated emissions. Solar assisted water heaters shall be installed when feasible.

5.4.4 Residual Impacts

Implementation of the recommended construction activity mitigation measure, in conjunction with standard construction practices, would reduce NO_x emissions to the extent feasible. The effectiveness of watering on graded surface PM₁₀ emissions is approximately 50 percent and 84.3 percent for batch drops and bulldozing (assuming soil moisture is increased to 15 percent). Residual construction activity impacts are considered less than significant. Mitigated peak day construction emissions are presented in Table 5.4-5.

Table 5.4-5. Mitigated Construction Emissions

Source	Percent Control				Mitigated Emissions (lb/day)			
	ROC	CO	NO _x	PM ₁₀	ROC	CO	NO _x	PM ₁₀
Heavy Equipment	0.0	0.0	0.0	0.0	8.4	23.7	77.2	7.3
On-Road Trucks	0.0	0.0	0.0	0.0	4.1	12.2	23.0	3.3
Bulldozing	0.0	0.0	0.0	84.3	0.0	0.0	0.0	71.0
Batch Drop	0.0	0.0	0.0	84.3	0.0	0.0	0.0	0.5
Wind Erosion	0.0	0.0	0.0	50.0	0.0	0.0	0.0	52.8
TOTAL					12.5	35.9	100.2	134.9

Long-term localized and regional air quality impacts would be less than significant prior to mitigation. Implementation of the recommended operational measures would serve to reduce the proposed project's contribution to cumulative impacts upon regional air quality.

5.5 NOISE

This section analyzes the potential noise impacts associated with project-related construction activity and with the proposed parking structure. Noise impacts associated with on-street traffic were analyzed in the Initial Study that was circulated with the May 18, 1993 NOP and were found to be less than significant.

5.5.1 Setting

5.5.1.1 Existing Conditions

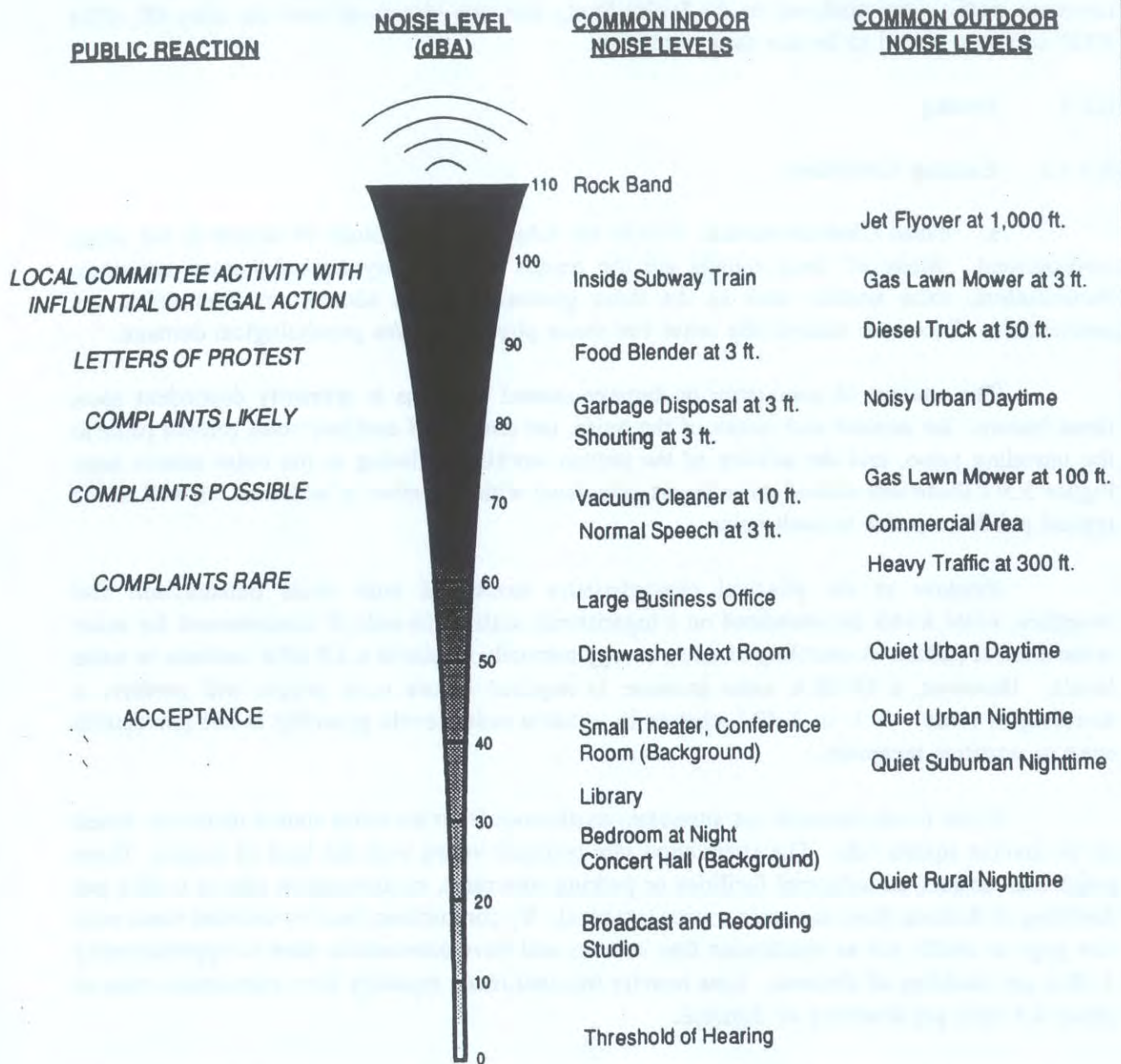
a. **Noise Characteristics.** People are subject to a multitude of sounds in the urban environment. Many of these sounds are the results of necessary normal human activities. Nevertheless, some sounds, such as the those generated by jet aircraft or automobiles, are undesirable. Excessive undesirable noise can cause physical and/or psychological damage.

The amount of annoyance or damage caused by noise is primarily dependent upon three factors: the amount and nature of the noise, the amount of ambient noise present prior to the intruding noise, and the activity of the person working or living in the noise source area. Figure 5.5-1 illustrates normal noise levels associated with a number of activities, as well as the typical public response to such noise.

Because of the physical characteristics associated with noise transmission and reception, noise levels are measured on a logarithmic scale. The unit of measurement for noise is the decibel (dBA). A doubling of noise energy normally results in a 3.0 dBA increase in noise levels. However, a 10 dBA noise increase is required before most people will perceive a doubling of noise. A 1- to 2-dBA change in ambient noise levels generally is not perceptible even to sensitive receptors.

Noise levels diminish (or attenuate) as distance from the noise source increases, based on an inverse square rule. The attenuation rate constant varies with the type of source. From point sources such as industrial facilities or parking structures, an attenuation rate of 6 dBA per doubling of distance from the noise source is typical. By comparison, heavily traveled roads with few gaps in traffic act as continuous line sources and have attenuation rates of approximately 3 dBA per doubling of distance. Less heavily traveled roads typically have attenuation rates of about 4.5 dBA per doubling of distance.

The duration of noise and the time period at which it occurs are important factors in determining the impact of noise on nearby receptors. Noise is more disturbing at night than during the day and noise indices have been developed to account for the varying duration of noise events over time, as well as community response to such events. The Community Noise Equivalent Level (CNEL) and the Day-Night Average Level (Ldn) are two such indices. Both of these indices represent time-weighted average values based on the equivalent sound level (Leq), which is a constant sound level that equals the same amount of acoustic energy as actual



SOURCE: Caltrans Noise Manual, California Department of Transportation, March, 1980.

5.5 Noise

time-varying sound over a given time period. The CNEL penalizes noise occurring at night (10 p.m. to 7 a.m.) by 10 dBA to account for increased sensitivity of people to noise after dark. Evening (7 p.m. to 10 p.m.) noise levels are penalized 5 dBA by the CNEL. Appropriately weighted hourly Leqs are then combined over a 24-hour period to calculate the CNEL. The Ldn is roughly equivalent to the CNEL, but does not penalize evening levels.

b. Site-Specific Setting. The primary existing noise sources associated with operations at the VCMC campus include vehicular movement (both onsite and offsite) and mechanical equipment at project site structures. Noise is generated by automobiles entering and leaving all of the onsite parking lots, as well as on adjacent roadways such as Hillmont Avenue, Loma Vista Road, and Foothill Road. Noise levels are greatest in the early morning and late afternoon hours, when traffic to and from the site is the greatest.

Sensitive receptors in the vicinity of the project site include onsite medical facilities and the residences surrounding the campus to the west, north, and south. The residential properties most affected by onsite vehicular movement are those directly abutting the campus to the west along Estrella Street and to the east along Agnus Drive.

Monitoring of current noise levels at two locations on the VCMC site was conducted between 8 a.m. and 9 a.m. on July 2, 1993: immediately west of the emergency generator on the site of existing surface parking and east of the existing boiler and laundry building immediately adjacent to Agnus Drive residential properties. Leq's on the site of the existing surface parking were 56.7 dBA, while Leqs east of the boiler and laundry building were 54.7 dBA. Noise levels at the former site were attributed primarily to motor vehicle operation while levels at the latter site were due primarily to the operation of mechanical equipment at the boiler and laundry building.

5.5.1.2 Regulatory Setting

To limit population exposure to physically and/or psychologically significant noise levels, the State of California, various county governments, and most municipalities in the state have established guidelines and ordinances to control noise. Noise standards in the City of Ventura Noise Element (1989) generally rely on the guidelines set forth by the California Department of Health Service (DHS) Office of Noise Control. According to these land use compatibility guidelines, noise is considered significant if sensitive land uses are exposed to an exterior noise level of greater than 65 dBA CNEL or an interior level of 45 dBA CNEL. Noise sensitive land uses are generally defined as residences, transient lodging, schools, hospitals, nursing homes, churches, meeting halls, office buildings, and mortuaries.

5.5.2 Impact Analysis

5.5.2.1 Methodology and Significance Thresholds

a. **Methodology.** Noise generated by construction activities on the VCMC campus are assessed using a worst-case scenario which assumes three pieces of construction equipment operating simultaneously.

Estimates of noise levels associated with the proposed parking structure are based on monitoring conducted by Fugro-McClelland in February 1993 at the four-level structure located near the Community Memorial Hospital in Ventura. Noise sampling was conducted near garage exits and entrances distant from other arterial noise sources. This resulted in measured noise levels that generally reflected that associated with activities occurring in and around the parking structure.

Noise monitoring conducted at approximately 50 feet from the structure resulted in an Leq (20-minute sample) of 54.2 dBA, with a peak level (Lmax) of 82.6 dBA. The peak noise level was primarily attributed to a car alarm that was activated for monitoring purposes.

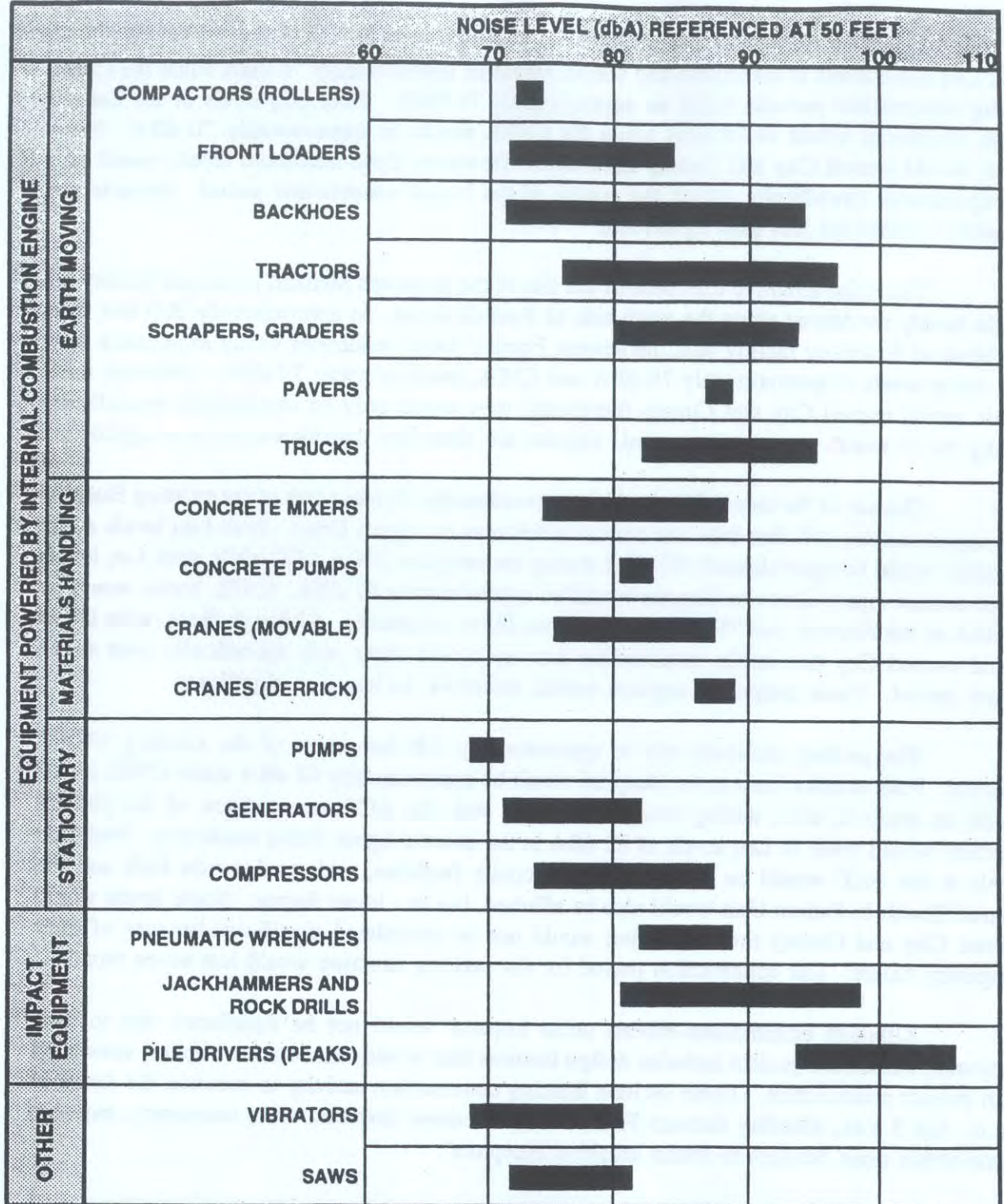
b. **Significance Thresholds.** For purposes of this EIR, construction noise is considered significant if it would cause a continuous exceedance of the City of Ventura CNEL threshold for a period of 1 year or longer. Noise impacts related to the proposed parking structure are considered significant if sensitive land uses are exposed to exterior noise levels exceeding 60 dBA CNEL or interior levels exceeding 45 dBA CNEL.

5.5.2.2 Project Impacts

a. **Construction-Related Noise.** Noise generated during construction activities varies considerably, depending upon the type of equipment used, the operating characteristics of equipment, and equipment maintenance. Figure 5.5-2 shows typical noise levels associated with construction equipment.

Construction noise generally represents a short-term impact on ambient noise levels in a given location. The construction equipment anticipated to be used during construction activities on the site include a bulldozer, a loader, and a scraper. Noise sensitive uses most likely to be affected by construction noise are the existing onsite medical facilities and the residences directly abutting the campus along Agnus Drive to the east.

The Mental Health In-Patient Unit would be constructed along Loma Vista Road, approximately 80 feet from the existing Hospital and across Hillmont Avenue from the existing Public Health building. Peak Leq levels at these facilities would be roughly 83-84 dBA while the CNEL would be about 72 dBA. The nearest offsite noise sensitive uses include St. Paul's Episcopal Church and school across Loma Vista Road (approximately 150 feet away) and the residences west of the campus on the east side of Estrella Street (approximately 300 feet away).



NOTE: Based on limited available data samples.

SOURCE: EPA, 1971 "Noise from Construction Equipment and Operations, Building Equipment and Home Appliances," NTID 300-1.

TYPICAL CONSTRUCTION EQUIPMENT NOISE LEVELS

000401

5.5 Noise

Peak Leq noise levels at the church and school would be approximately 79 dBA while the CNEL during construction periods would be approximately 76 dBA. Peak Leq levels at the Estrella Street residences would be 73 dBA while the CNEL would be approximately 70 dBA. These levels would exceed City and County thresholds. However, these maximum levels would only be experienced sporadically during the course of the 1-year construction period. Impacts are, therefore, considered less than significant.

The noise sensitive uses nearest the site of the proposed Medical Examiner facility are single-family residences along the north side of Foothill Road. At approximately 200 feet from the Medical Examiner facility site, the nearest Foothill Road residences would experience peak Leq noise levels of approximately 76 dBA and CNEL levels of about 73 dBA. Although these levels would exceed City and County thresholds, they would only be experienced sporadically during the 11-month construction period. Impacts are, therefore, considered less than significant.

The site of the new ACC would be approximately 30 feet north of the existing Hospital and approximately 140 feet from the nearest residences on Agnus Drive. Peak Leq levels at the Hospital would be approximately 93 dBA during construction of the ACC while peak Leq levels at the nearest Agnus Drive residences would be approximately 82 dBA. CNEL levels would be 89 dBA at the Hospital and 79 dBA at the Agnus Drive residences. Although these noise levels would exceed City thresholds, construction activity would occur only sporadically over an 18 month period. These temporary impacts would, therefore, be less than significant.

The parking structure site is approximately 500 feet north of the existing VCMC Hospital. Peak exterior Leqs at the Hospital would be approximately 68 dBA while CNEL levels would be about 65 dBA during construction. As with the ACC, construction of the parking structure would result in Leq levels of 82 dBA at the nearest Agnus Drive residences. Peak Leq levels at the ACC would be 79 dBA. Other onsite facilities, such as Juvenile Hall and the Mental Health In-Patient Unit would also be affected, but to a lesser degree. Noise levels would exceed City and County thresholds, but would not be considered significant because of their temporary nature. The construction period for the parking structure would last seven months.

Although construction-related noise impacts would not be significant due to their temporary nature, the project includes design features that would reduce noise impacts associated with project construction. These include limiting construction activity to between the hours of 8 a.m. and 5 p.m., Monday through Friday, and, whenever feasible, using temporary, movable construction noise barriers to shield sensitive receptors.

b. Parking Structure Noise. Project implementation would introduce a three-level parking structure with 500 spaces near residences along Agnus Drive. Traffic associated with parking structures is not generally of sufficient volume to exceed community noise standards based upon the time-weighted CNEL scale. However, automobile engine start-ups and acceleration, tire squeal noise, and the activation of car alarm systems in structures can be sources of noise annoyance problems.

5.5 Noise

As currently proposed, the parking structure would be located approximately 150 feet from the property lines of residences along Agnus Drive. Due to the periodic nature of noise from parking structures, operations at the structure would not cause an exceedance of the City's 65 dBA CNEL threshold. However, based upon noise sampling conducted by Fugro-McClelland, noise associated with the parking structure would result in Leq levels of approximately 44.7 dBA and an Lmax level of 73.1 dBA (for incidental occurrences) at the most affected Agnus Drive residences. This is lower than the 54.7 dBA Leq currently generated by operations at the existing laundry building. Consequently, general parking structure noise generally would not be heard over current noise levels in the area. In addition, topographic variations and existing walls and structures (the boiler and laundry building and emergency generator) would buffer noise from the structure to some degree. However, peak noise levels, which would be approximately 73.1 dBA at the nearest residences, may occasionally be audible.

Because noise levels associated with the proposed parking structure would not exceed any established threshold and would not generally be audible to Agnus Drive residents, impacts would be considered less than significant. Nevertheless, by generating peak noise levels that could cause periodic annoyance to adjacent residents, noise impacts associated with the proposed parking structure would be adverse.

As discussed in Section 3.7 of the Project Description, construction activities on the site would conform with standard noise reduction procedures. These include limiting construction activity to between 8 a.m. and 5 p.m, and, when feasible, the use of temporary, movable construction noise barriers to shield sensitive receptors.

5.5.2.3 Cumulative Impacts

Project implementation would incrementally contribute to increases in traffic-related ambient noise levels along roadways in the vicinity of the project site. However, the increase in traffic associated with the project would not increase noise levels by an amount that would be perceptible (3 dBA or greater).

Because noise associated with onsite construction activity would be temporary, it would not contribute to cumulative long-term noise level increases. The proposed parking structure would primarily move currently dispersed parking both onsite and offsite into a single structure. As such, although noise levels would increase slightly at the location of the parking structure, operation of the structure would not contribute to any cumulative noise level increases. Cumulative noise level increases would, therefore, be less than significant.

5.5.3 Mitigation Measures

5.5.3.1 Construction Noise Measures

As discussed above, noise impacts associated with construction activity would be less than significant and the design features that are proposed as part of the project (see Section 3.7,

5.5 Noise

Project Design Features) would reduce noise levels further. Nevertheless, the following additional measures are recommended to minimize noise impacts to surrounding uses.

- NOI-1. Muffler Exhaust Systems.** All construction equipment, fixed or mobile, operated on the VCMC campus shall be equipped with properly operating muffler exhaust systems.
- NOI-2. Equipment Placement.** When feasible, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receptors.
- NOI-3. Stockpiling and Vehicle Staging.** Stockpiling and vehicle staging areas shall be located as far as practical from sensitive receptors.
- NOI-4. Construction Activity Consolidation.** When feasible, the noisiest construction operations should be arranged to occur together in the construction program to avoid continuing periods of greater annoyance.

5.5.3.2 Parking Structure Noise Measures

Although long-term noise levels related to the project would not exceed the City's residential noise threshold, the following measures are recommended to minimize noise annoyance from the proposed parking structure.

- NOI-5. Non-Squeal Paving.** Non-squeal paving finishes shall be used within the parking structure and on all external ramps of the parking structure.
- NOI-6. Walls.** The design of the parking structure shall incorporate features (such as solid walls or baffles on the east elevation) to reduce noise impacts to the nearest residential areas.
- NOI-7. Speed Bumps.** Speed bumps shall be incorporated into the parking structure to reduce vehicle speeds.
- NOI-8. Rubberized Expansion Plates.** Parking structure expansion plates shall be of rubberized materials to reduce noise generated by vehicular movement.
- NOI-9. Sweeper Operation Restrictions.** If noise problems arise from parking structure sweeper operations, sweeping activities shall be restricted to the hours determined appropriate by the County of Ventura.

5.5.4 Residual Impacts

Noise impacts associated with the proposed project would be less than significant prior to mitigation. Implementation of the recommended mitigation measures would further reduce impacts.

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6.0 GROWTH-INDUCING IMPACTS

Section 15126(g) of the *State CEQA Guidelines* requires a discussion of the growth-inducing impact of the proposed action. By increasing the available building area on the site, project implementation would potentially enable campus facilities to accommodate more employees and patients in the future. Therefore, although it is not the primary intent of the project to accommodate expanded services, project implementation may indirectly facilitate growth in service on the VCMC campus.

However, as stated in Section 3.5, one of the primary objectives of the proposed VCMC expansion is to relieve current overcrowding conditions at various campus facilities and clinics. For this reason, the increase in onsite building area on the site is not generally anticipated to induce further growth in services provided, but rather to improve the service that is currently provided. Therefore, the project is not inherently growth inducing.

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7.0 ALTERNATIVES

In accordance with Section 15126 (d) of the *State CEQA Guidelines*, this section addresses a range of reasonable alternatives to the proposed project which may be capable of reducing or eliminating some of the environmental impacts associated with the project. Section 7.1 examines five onsite alternative development scenarios while Section 7.2 discusses the feasibility of implementing the proposed project on alternative sites. Section 7.3 compares the various alternatives and presents the environmentally superior alternative.

7.1 ALTERNATIVES ON THE PROJECT SITE

Five reasonable alternative onsite projects were selected for consideration, including the CEQA-required "No Project" Alternative and four alternative siting scenarios. Table 7.1-1 provides a summarized comparison of the characteristics of each of the project alternatives. Textual descriptions of the alternatives are provided in the following subsections, followed by a comparison of the impacts associated with the alternative to those of the proposed project.

Table 7.1-1. Alternatives Summary

New Building Area/ Employment	No Project	Proposed Project	Alternative Site Plan 1	Alternative Site Plan 2	Alternative Site Plan 3	Alternative Site Plan 4
Construction (square feet)	0	144,003	144,003	144,003	144,003	177,003
Demolition (square feet)	0	81,888	101,080	81,888	81,888	110,384
Net New Building Area (square feet)	0	62,115	42,923	62,115	62,115	66,619
Net New Employees	0	56	22	56	56	56
Characteristics of New Onsite Parking						
Surface Spaces	0	0	229	73 ^a	0	500
Structure Spaces	0	500	271	427	500	0
Parking Structure Levels	--	3	2	2½	3	--

^a A total of 229 surface parking spaces would be added under this alternative while an additional 156 surface spaces would be removed, for a net increase of 73 surface spaces.

7.1.1 No Project Alternative

The No Project Alternative assumes a "no change" scenario in which no new development occurs on the site. All existing structures would remain and campus operations would remain in these structures.

7.1.1.1 Land Use

No changes to the existing land use pattern on the VCMC campus would occur under the No Project Alternative. Consequently, no new structures exceeding City of Ventura height

7.0 Alternatives

limitations for the Hospital zone would be constructed and no new inconsistencies with City land use policy would occur.

No structures having potential compatibility conflicts with adjacent residences along Agnus Drive would be constructed. Thus, no new compatibility problems would arise. However, none of the existing structures located immediately adjacent to Agnus Drive residential properties would be removed under the No Project alternative. Consequently, the potentially beneficial impacts related to the removal of these buildings would not occur. In addition, the space requirements of the clinics and other medical facilities currently operating on the VCMC campus would not be met.

The No Project Alternative would be superior from a land use policy consistency standpoint. Because this alternative would include neither the adverse or beneficial impacts of the proposed project, its land use compatibility impacts are considered similar. Overall land use impacts are therefore considered somewhat lower for the No Project Alternative.

7.1.1.2 Aesthetics/Shadow/Light & Glare

Under the No Project Alternative, existing aesthetic conditions on the VCMC campus would remain. The Loma Vista Road corridor would not be altered under this alternative and the existing front yard setback along that corridor would not be adversely affected. In addition, no viewshed impacts to the Foothill Road scenic corridor would occur and there would be no alteration of views from Loma Vista Road or Agnus Drive. Thus, none of the adverse impacts associated with the implementation of the proposed project would occur.

At the same time, the beneficial effects associated with improvements in the aesthetic clarity of the campus and the removal of existing structures immediately adjacent to Agnus Drive residences would not occur. Because the No Project Alternative would not include either the adverse or beneficial impacts of the proposed project, its overall aesthetic impacts would be similar.

7.1.1.3 Transportation and Circulation

The No Project Alternative would not generate any new vehicle trips, as compared to the 640 daily trips projected to be generated by implementation of the proposed project. Consequently, although the proposed project's impact on local traffic conditions would be less than significant, the No Project Alternative's impact would be lower.

This alternative would not provide any additional onsite parking, as compared to the 500 additional spaces (271-space increase) provided by the proposed project. Although the No Project alternative would not generate any additional demand for parking on the campus, most of the new parking provided under the proposed project (76%) is intended to relieve overcrowding of existing onsite parking facilities. Thus, this alternative would not have the proposed project's beneficial impacts related to improving campus parking opportunities and reducing

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demand for on-street parking, primarily on Loma Vista Road, Hillmont Avenue, and Agnus Drive.

The No Project Alternative would have fewer impacts on offsite circulation but greater impacts on onsite parking conditions. Consequently, overall transportation and circulation impacts are considered similar to those of the proposed project.

7.1.1.4 Air Quality

The No Project Alternative would not result in any increase in air emissions associated with operations at the VCMC campus. By comparison, implementation of the proposed project would add 640 daily automobile trips to and from the campus, resulting in increased emissions of all criteria air pollutants.

The three level parking structure proposed as part of the project would not be added under the No Project Alternative. Thus, although CO concentrations associated with the proposed parking structure would not cause an exceedance of federal or state standards, the increased CO concentrations associated with the structure would not occur under this alternative. Overall air quality impacts would be lower under the No Project Alternative.

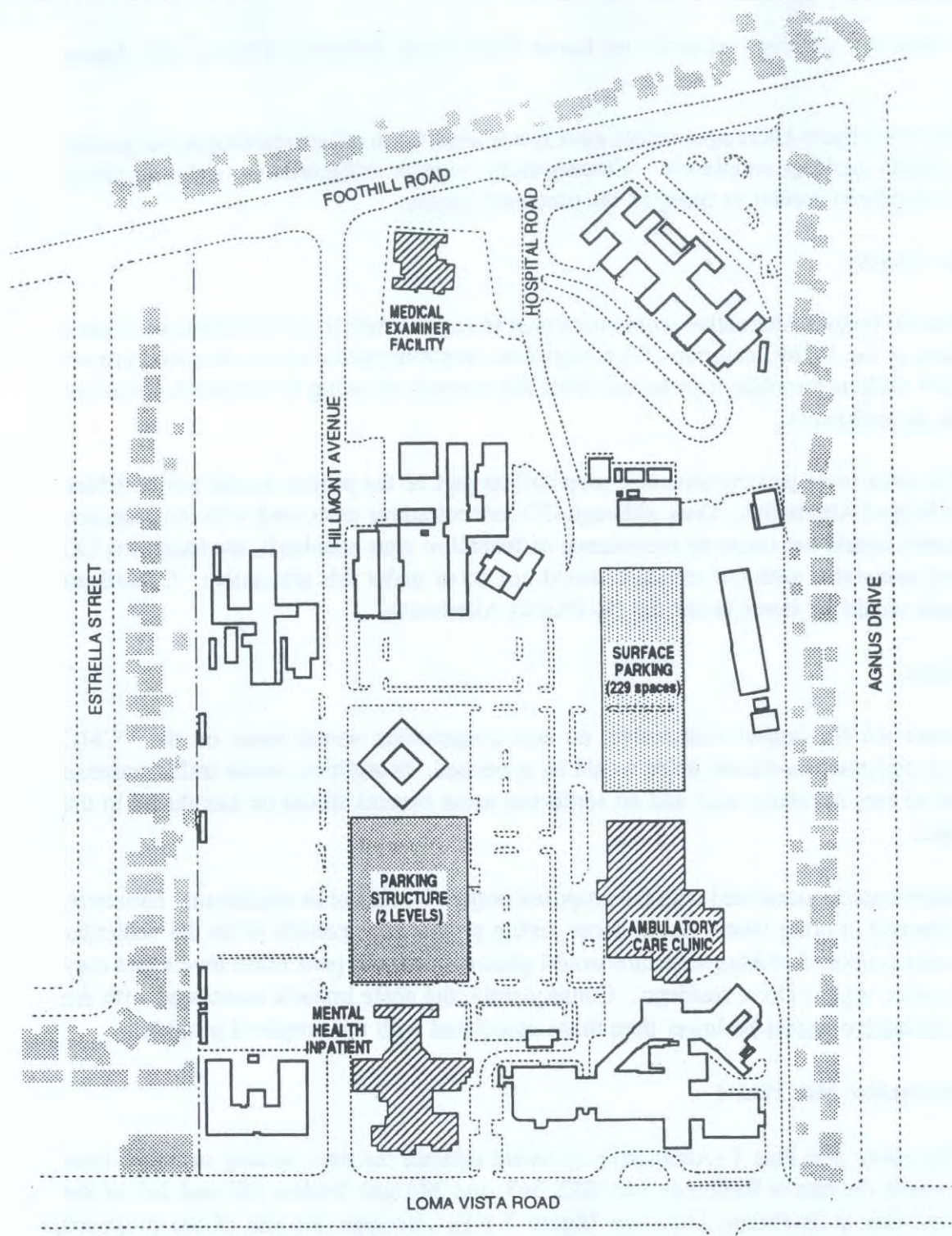
7.1.1.5 Noise

Under the No Project Alternative, no new construction would occur on the VCMC campus and no construction-related noise would be generated. In addition, onsite traffic patterns would remain as they currently exist and no additional noise sources would be introduced to the VCMC campus.

Noise impacts associated with the proposed project would not be significant. However, temporary increases in noise levels would occur during project construction while the vehicular movement at the proposed parking structure would generate periodic peak noise levels that may be audible to some Agnus Drive residents. Consequently, the noise impacts associated with the No Project Alternative would be lower than those associated with the proposed project.

7.1.2 Alternative Site Plan 1

Alternative Site Plan 1 (Alternative 1) would relocate the new parking structure from its proposed site to the site of Buildings 341, 342, 343, and 344 and Trailers 352 and 367 of the existing Mental Health In-Patient Unit (see Figure 7.1-1). Because the site of the proposed parking structure would become surface parking for 229 spaces, the structure under Alternative 1 would contain only 271 spaces, as compared to the 500-space structure proposed as part of the project. Consequently, the structure would only need to be two levels in height, as compared to the proposed three level structure.



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ALTERNATIVE 1
SITE PLAN

7.0 Alternatives

Under Alternative 1, 19,192 square feet of buildings and trailers at the existing Mental Health In-Patient Unit, which would remain and be occupied under the proposed project, would be demolished/removed. Consequently, implementation of this alternative would add 19,192 fewer net square feet than would the proposed project, thereby resulting in a total net increase of 42,923 square feet of new building area.

Existing structures that would accommodate new office employees under the proposed project would instead be demolished. Therefore, no new office employees could be accommodated onsite under Alternative 1. Consequently, this alternative would accommodate 34 fewer new employees than would the proposed project. This would leave a total increase of only 22 employees, all at the new Mental Health In-Patient Unit.

7.1.2.1 Land Use

This alternative would relocate the proposed parking structure toward the center of the VCMC campus, away from the residences on Agnus Drive. It would also decrease the height of the structure to two levels. Consequently, the structure would be largely outside the viewshed of Agnus Drive residents. In this manner, the potential for land use compatibility conflicts would be reduced to some degree under this alternative.

The ACC would, however, remain in the same location as proposed under the project. Consequently, the height of the five-story structure would continue to be inconsistent with City of Ventura limitations and conflicts associated with the ACC height and massing would be the same as those of the proposed project. Because the ACC is the primary cause of potential land use impacts associated with the proposed project, the primary impact of this alternative would be the same. Nevertheless, by relocating the proposed parking structure further from Agnus Drive residences and reducing its height, Alternative 1's land use impacts would be slightly lower than those of the proposed project.

7.1.2.2 Aesthetics/Shadow/Light & Glare

By relocating the proposed parking structure away from residences along Agnus Drive, Alternative 1 would reduce the potential for viewshed impacts associated with the structure. The two-level structure that would be constructed under this alternative would be west of the five-story ACC and would therefore largely be shielded from view from Agnus Drive properties. Lighting impacts from the structure on Agnus Drive residences would also be reduced under this alternative, although nighttime lighting from the structure would be more visible to residents west of the project site along Estrella Street.

Under Alternative 1, the proposed ACC would, however, remain in the same location as for the proposed project. Consequently, the viewshed impacts associated with the ACC would be the same as those of the proposed project. Light and shadow effects associated with the ACC would also be the same as those of the proposed project.

7.0 Alternatives

The proposed Medical Examiner facility would also be in the same location as that of the proposed project. Consequently, viewshed impacts would be the same. Construction of the facility would continue to be inconsistent with County and City policies related to the preservation of views from Foothill Boulevard.

Aesthetics, shadow, and light impacts associated with the parking structure would be lower under Alternative 1 while impacts associated with the ACC and the Medical Examiner facility would be the same as those of the proposed project. Overall impacts would therefore be slightly lower under this alternative.

7.1.2.3 Transportation and Circulation

Because Alternative 1 would accommodate fewer new employees on the project site than the proposed project (22, as compared to 56), it would generate fewer additional vehicle trips to and from the site. Internal circulation impacts would be about the same as those of the proposed project. Consequently, impacts to the local circulation system would be somewhat lower under this alternative.

7.1.2.4 Air Quality

Alternative 1 would involve the demolition of four additional structures (encompassing approximately 1.4 acres), as compared to the proposed project. The overall area disturbed during project construction, and dust emissions associated with construction activity, would therefore be somewhat greater. Consequently, short-term air quality impacts associated with construction activities would be greater than those of the proposed project.

The overall increase in onsite employment would be only 22 under this alternative, as compared to the 56-employee increase that would occur under the proposed project. Consequently, although the increase in air emissions associated with the proposed project would be less than County thresholds, the increase in vehicle trips and associated vehicular air emissions would be lower under this alternative.

Because the proposed parking structure would be located toward the center of the VCMC campus and away from sensitive residential uses, the potential for an increase in carbon monoxide (CO) concentrations at the Agnus Drive residences would be lower. However, under this alternative, the structure would be adjacent to the proposed Mental Health In-Patient Unit, thus potentially causing increased CO concentrations at that facility. In addition, the ACC would be directly east of the structure. Consequently, the prevailing westerly winds in the project vicinity may result in somewhat greater exposure of ACC employees and patients to increased CO concentrations. It should, however, be noted that the increase in CO concentrations would be less than significant under either this alternative or the proposed project.

Construction air quality impacts would be greater under this alternative, while emissions associated with long-term vehicular movement would be lower and the potential for

7.0 Alternatives

exposure to increased CO concentrations would be about the same. Consequently, overall air quality impacts associated with Alternative 1 would be similar to those of the proposed project.

7.1.2.5 Noise

Temporary noise impacts associated with construction activity would be slightly greater under Alternative 1 due to the greater overall amount of demolition and construction that would occur.

Implementation of this alternative would generate only 22 new employees, as compared to the 56 new employees generated by implementation of the proposed project. Consequently, the increase in traffic and traffic-related noise generated by this alternative would be less than that generated by the proposed project.

In addition, this alternative would locate the proposed parking structure near the center of the VCMC campus and away from Agnus Drive residences. Consequently, the potential for periodic noise level increases at adjacent residences related to parking structure operations would be less under this alternative. However, noise from the parking structure would have greater impacts on the Mental Health Unit and on residences west of the project site under this alternative.

Construction noise would be somewhat greater under Alternative 1, while on-street traffic noise would be lower and noise impacts associated with the proposed parking structure would be about the same. Overall noise impacts associated with this alternative would therefore be about the same as those of the proposed project.

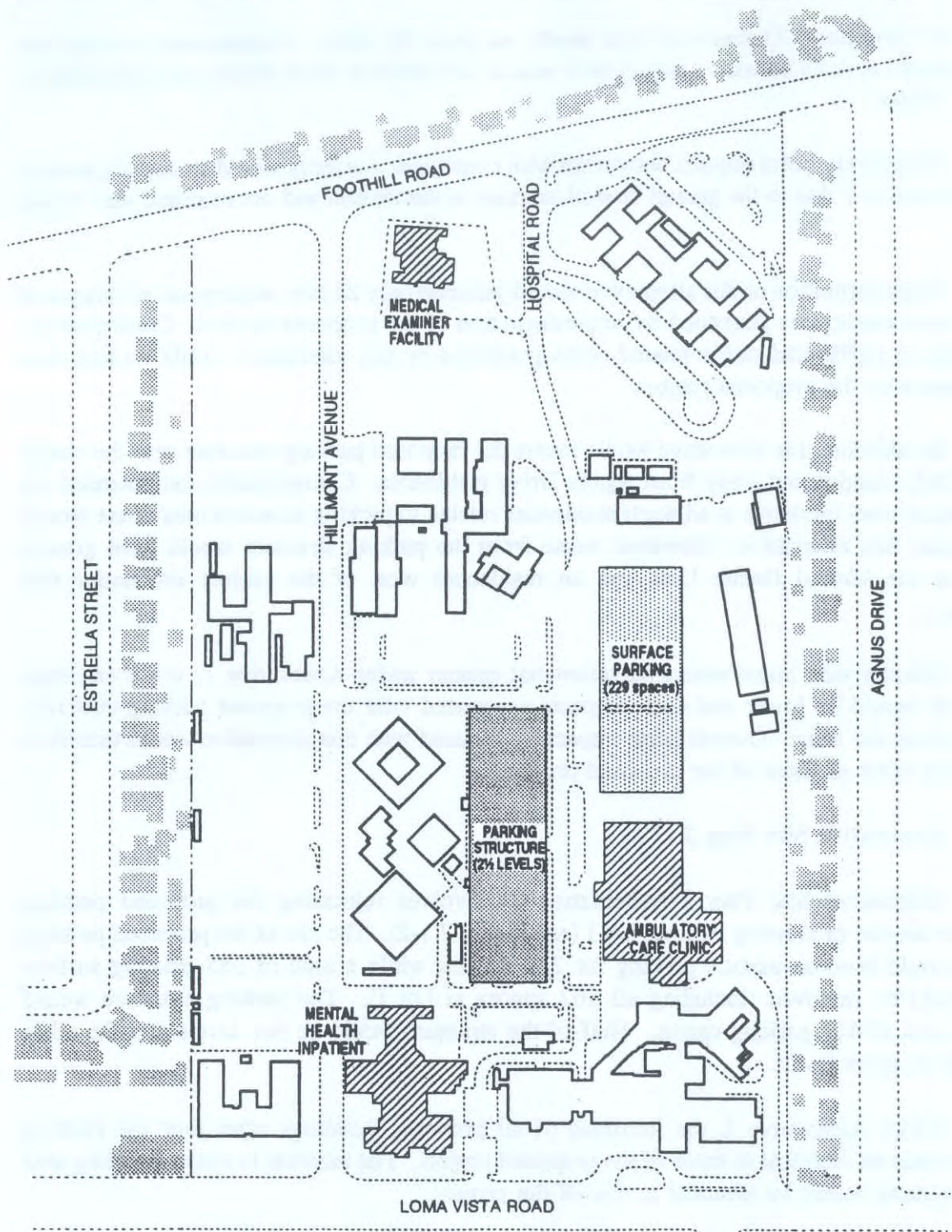
7.1.3 Alternative Site Plan 2

Alternative Site Plan 2 (Alternative 2) involves relocating the proposed parking structure to the site of existing Parking Lot I (see Figure 7.1-2). The site of the proposed parking structure would become surface parking for 229 spaces, while a total of 385 existing surface spaces would be removed (including all 162 spaces at Lot I). The parking structure would contain a total of 427 parking spaces. Half of the structure would be two levels and the other half would be three levels.

Under Alternative 2, the locations of all proposed buildings other than the parking structure would be identical to those of the proposed project. The increase in onsite building area and employment would be identical to that of the project.

7.1.3.1 Land Use

Alternative 2 would reduce the height of a portion of the proposed parking structure and would relocate the structure toward the center of the VCMC campus, away from the residences on Agnus Drive. The structure would therefore be largely outside the viewshed of



NORTH



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ALTERNATIVE 2
SITE PLAN

Agnus Drive residents. Consequently, the potential for adverse land use impacts would decrease to some degree under this alternative.

The ACC would, however, remain in the same location as proposed under the project. Potential conflicts associated with the ACC's building height and scale would therefore be the same as those of the proposed project. Because the five-story ACC is the primary cause of potential land use impacts associated with the proposed project, this alternative's primary land use impact would be the same. Nevertheless, the relocation of the proposed parking structure further from Agnus Drive residences and the reduction of its height would render this alternative's potential for land use impacts slightly lower than that of the proposed project.

7.1.3.2 Aesthetics/Shadow/Light & Glare

The two- and three-level parking structure that would be constructed under Alternative 1 would be west of the five-story ACC and would therefore largely be shielded from view from Agnus Drive properties. Consequently, the relocation of the structure away from the Agnus Drive residences under this alternative would reduce the potential for viewshed impacts associated with the structure. The potential for lighting impacts from the structure on Agnus Drive residences would also be reduced under this alternative.

The ACC would, however, remain in the same location as for the proposed project under this alternative. Consequently, the viewshed impacts associated with the ACC would be the same as those of the proposed project. The ACC's light and shadow effects on Agnus Drive residences would also be the same as those of the proposed project.

The proposed Medical Examiner facility would also be in the same location as that of the proposed project. Consequently, viewshed impacts would be the same. Because only 20 percent of the frontage would be affected, the viewshed would not be significantly affected and a City policy inconsistency would not result.

Aesthetics, shadow, and light impacts associated with the parking structure would be somewhat lower under Alternative 1 while impacts associated with the ACC and the Medical Examiner facility would be the same as those of the proposed project. Overall impacts would therefore be slightly lower under this alternative.

7.1.3.3 Transportation and Circulation

The increase in vehicle trips generated by Alternative 2 would be the same as that generated by the proposed project. No area roadways would be significantly affected. Impacts to the internal circulation system on the VCMC campus would also be about the same as those of the proposed project. Consequently, impacts to both the onsite and local offsite circulation system would be identical to those associated with the proposed project.

7.0 Alternatives

7.1.3.4 Air Quality

Implementation of Alternative 2 would entail the demolition of all buildings planned for demolition under the proposed project, as well as the replacement of existing 1.3-acre Parking Lot I with a parking two-level parking structure. Consequently, construction of this alternative would result in the disturbance of a greater overall area than would construction of the proposed project and overall fugitive dust emissions associated with construction activities would be somewhat greater.

The overall trip generation associated with Alternative 2 would be identical to that of the proposed project. Consequently, the increase in vehicular air emissions associated with this alternative would be the same as that associated with implementation of the proposed project and would be less than County thresholds.

The proposed parking structure would be located toward the center of the VCMC campus and away from sensitive residential uses. Therefore, the potential for an increase in CO concentrations at the Agnus Drive residences would be lower. However, under this alternative, the structure would be adjacent to the proposed Mental Health In-Patient Unit, thus potentially causing increased CO concentrations at that facility. In addition, because the ACC would be directly east of the structure, the prevailing westerly winds in the project vicinity may result in somewhat greater exposure of ACC employees and patients to increased CO concentrations. It should, however, be noted that the increase in CO concentrations would be less than significant under either this alternative or the proposed project.

Construction air quality impacts would be somewhat greater under Alternative 2, while emissions associated with long-term vehicular movement and the potential for exposure to increased CO concentrations would be about the same. Consequently, overall air quality impacts associated with this alternative would be slightly greater than those of the proposed project.

7.1.3.5 Noise

This alternative would entail slightly more construction activity than would the proposed project. As such, overall construction-related noise impacts would be somewhat greater.

Traffic and traffic-generated noise associated with implementation of Alternative 2 would be identical to that generated by the proposed project.

By locating the proposed parking structure toward the center of the campus and away from Agnus Drive residences, the potential for periodic adverse impacts related to peak noise levels from parking structure operations would be reduced. In addition, the ACC would be located between the parking structure and Agnus Drive properties, thus providing additional shielding from parking structure noise impacts. Parking structure noise impacts to the Mental Health Unit and the existing Hospital would, however, be somewhat greater under this alternative due to the closer proximity of the structure to these facilities.

7.0 Alternatives

Construction noise impacts would be slightly greater under this alternative while both traffic and parking structure-related noise impacts associated with Alternative 2 would be about the same as those of the proposed project. Consequently, overall noise impacts would be slightly greater.

7.1.4 Alternative Site Plan 3

Under Alternative Site Plan 3 (Alternative 3), the locations of the proposed ACC and Mental Health In-Patient Unit would be reversed (see Figures 7.1-3 and 7.1-4). The ACC would remain a five-story 105,000 square-foot structure, but would front Loma Vista Road. The Mental Health In-Patient Unit would remain at 31,003 square feet but would be located between the existing Hospital and the proposed parking structure. The site plans for these two structures under this alternative have not been determined.

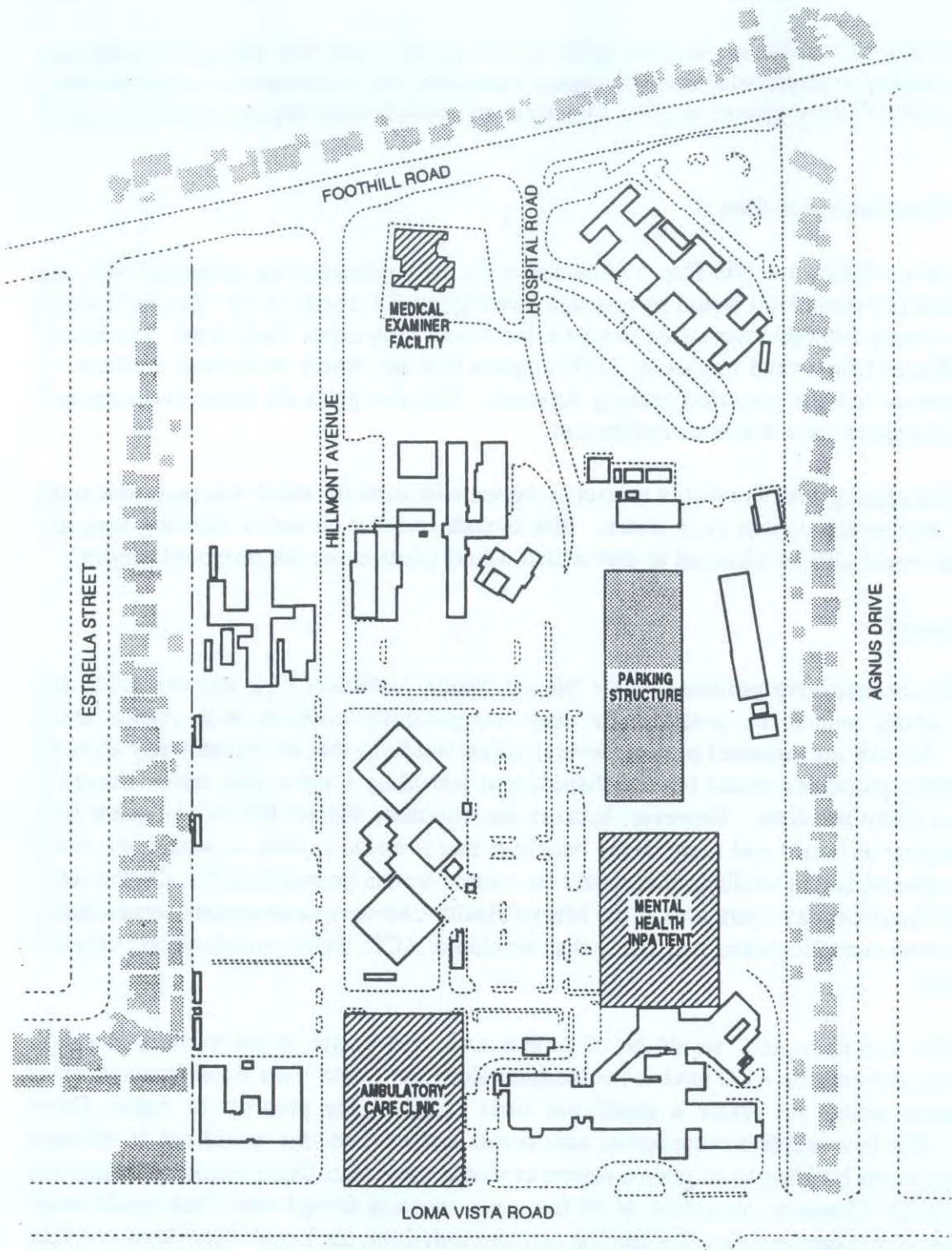
The parking structure would remain in the same location for which it is proposed under the project and would consist of 3 levels. The overall increase in onsite building area and employment would also be identical to that which would occur under the proposed project.

7.1.4.1 Land Use

By reversing the positions of the Mental Health In-Patient Unit and the ACC, this alternative would reduce the potential for scale compatibility conflicts with Agnus Drive residences. As with the proposed project, several onsite buildings that are immediately adjacent to Agnus Drive properties would be demolished, thus providing a more open environment for some Agnus Drive residents. However, because the one-story Mental Health In-Patient Unit would be similar in height and scale to the buildings that it would replace, it would not create the same scale and height conflicts that would be created by the proposed ACC. On the other hand, the 24-hours per day operations at the Mental Health Unit may cause greater compatibility problems related to traffic, noise, and safety than would the ACC, which would operate only 8-9 hours per day.

The five-story ACC would be of similar scale and height as the existing Hospital. Consequently, locating the ACC next to the Hospital along the Loma Vista Road frontage under this alternative would not create a significant scale compatibility problem to Agnus Drive residences. The less sensitive commercial uses across Loma Vista also would not be affected by the height of the building to as great a degree as would the Agnus Drive residences under the proposed project. However, placement of the five-story structure along Loma Vista would cause a greater loss of background views of the Ventura foothills from the Loma Vista Road corridor than would the one-story Mental Health In-Patient Unit.

As with the proposed project, implementation of the ACC under this alternative would not be consistent with City policies related to Hospital zone building height. Nevertheless, by locating the five-story ACC away from adjacent sensitive residential uses, this alternative would be more consistent with the local policies related to land use compatibility.

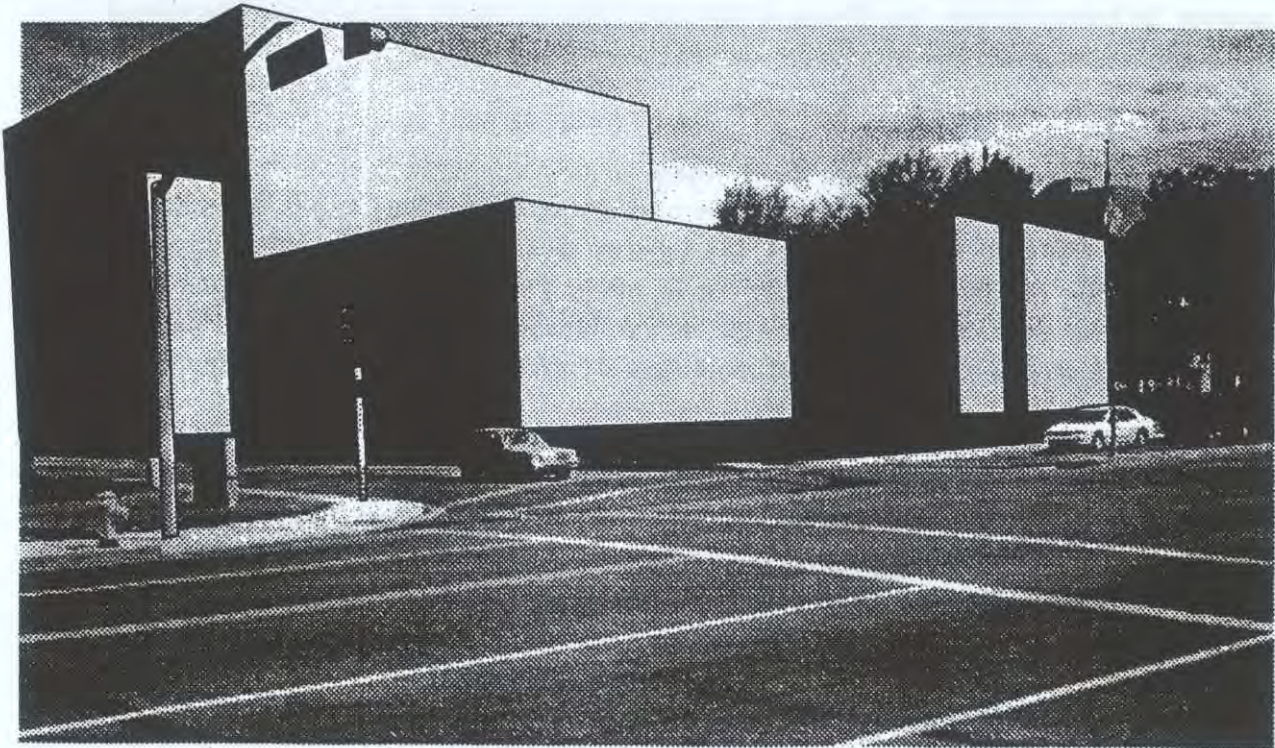


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ALTERNATIVE 3
SITE PLAN



Existing view of the VCMC campus from the southwest corner of the intersection of Loma Vista Road and Hillmont Avenue. The Structure in the foreground is the existing HCA Business Office.



View following implementation of Alternative Site Plan 3. The building in the foreground is the Ambulatory Care Clinic. This illustration depicts massing effect only. Window treatment and landscaping are not shown.

ALTERNATIVE 3
PHOTO SIMULATION

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7.0 Alternatives

Alternative 3 would have fewer land use impacts than the proposed project from a policy consistency standpoint and about the same impact from a land use compatibility standpoint. Consequently, overall land use impacts associated with this alternative would be somewhat lower than those of the proposed project.

7.1.4.2 Aesthetics/Shadow/Light & Glare

The proposed Medical Examiner facility would be in the same location under this alternative as under the proposed project. The alteration of views from Foothill Road associated with the proposed Medical Examiner facility would continue to be inconsistent with City policies related to the positive contribution to the viewshed of that scenic corridor. Although this alternative would improve the transition of scale of Agnus Drive residences, placement of the five-story ACC along Loma Vista Road would remain potentially inconsistent with City Policy 3.1.

By relocating the ACC to the Loma Vista Road frontage, this alternative would eliminate the proposed project's primary impact to views from residences along the west side of Agnus Drive. The one-story Mental Health In-Patient Unit would not obstruct views from Agnus Drive properties, and would therefore have less visual impact. Although the Mental Health Unit would operate 24 hours per day, the effects of light and glare on Agnus Drive residences would also be somewhat less under this alternative due to the reduced building height of the Mental Health Unit.

The ACC, fronting Loma Vista Road, would be greater in scale than the Public Health building across Hillmont Avenue, and than nearby uses across Loma Vista Road. However, it would be similar to the scale of the Hospital, immediately adjacent to the east. Consequently, the scale and massing of the structure would not represent a significant departure from what currently exists in the area. The five-story ACC would, however, block views of the Ventura foothills to the north from Loma Vista Road more than would the one-story Mental Health In-Patient Unit.

The effects of Alternative 3 on views from the Foothill Road corridor would be similar to those of the proposed project. Aesthetic and lighting impacts to Agnus Drive residences would be reduced to some degree under this alternative while impacts to the Loma Vista Road corridor would be slightly greater. Because the Agnus Drive residences are more visually sensitive than the Loma Vista Road commercial corridor, overall aesthetic impacts are considered lower under this alternative.

7.1.4.3 Transportation and Circulation

Traffic generated by Alternative 3 would be identical to that generated by the proposed project. Consequently, impacts to the local offsite circulation system would also be identical to those associated with the proposed project and would be less than significant. Internal circulation

7.0 Alternatives

impacts would also be similar to those of the proposed project. Overall transportation and circulation impacts would therefore be similar.

7.1.4.4 Air Quality

The area which would be disturbed during construction of Alternative 3 would be roughly the same as that disturbed under construction of the proposed project. As such, overall fugitive dust emissions associated with construction activities would be similar to that generated by the proposed project.

The overall trip generation associated with Alternative 3 would be identical to that of the proposed project. The increase in vehicular air emissions associated with this alternative would therefore be similar to that generated following implementation of the proposed project and would be less than County thresholds.

Under this alternative, the proposed parking structure would be the same size as that of the proposed project and would be in the same location. Consequently, the potential for an increase in carbon monoxide (CO) concentrations at the Agnus Drive residences and sensitive onsite uses would be the same.

Air quality impacts associated with project construction, long-term vehicular movement, and the proposed parking structure would be similar to those of the proposed project. Overall air quality impacts associated with Alternative 3 would therefore be the same as those which would be experienced under the proposed project.

7.1.4.5 Noise

Areas targeted for construction activity under Alternative 3 are the same as those in which construction would occur under the proposed project. Maximum noise levels experienced by adjacent receptors would therefore be similar. However, this alternative would locate the smaller Mental Health In-Patient Unit next to potentially affected noise sensitive residences along Agnus Drive rather than the five-story ACC. Therefore, the duration of construction-related noise impacts to Agnus Drive residents would be expected to be shorter under this alternative.

Traffic and traffic-generated noise associated with implementation of Alternative 3 would be identical to that generated by the proposed project. In addition, because the parking structure would be in the same location as under the proposed project, noise impacts associated with the structure would be the same.

Short-term construction impacts would be slightly lower under this alternative while long-term operational impacts would be about the same. Overall noise impacts associated with Alternative 3 would therefore be somewhat lower than those of the proposed project.

7.1.5 Alternative Site Plan 4

Under Alternative Site Plan 4 (Alternative 4), the Old Building of the VCMC Hospital (Building 306) would be demolished and the proposed ACC would be moved onto the site of that building and attached to the remaining Hospital facilities (see Figures 7.1-5 and 7.1-6). The ACC would be approximately 138,000 square feet and would consist of a partial basement and three above ground levels. The new structure would encompass all of the clinics proposed for the ACC, as well as the functions of the hospital facilities that would be removed.

The sites of the ACC and parking structure proposed under the project would become surface parking, and would accommodate up to 510 spaces. This would meet the additional 500-space demand that would exist following project implementation. Thus, no multi-level parking structure would be needed. The Mental Health In-Patient Unit and the Medical Examiner Facility would remain in the locations proposed under the project.

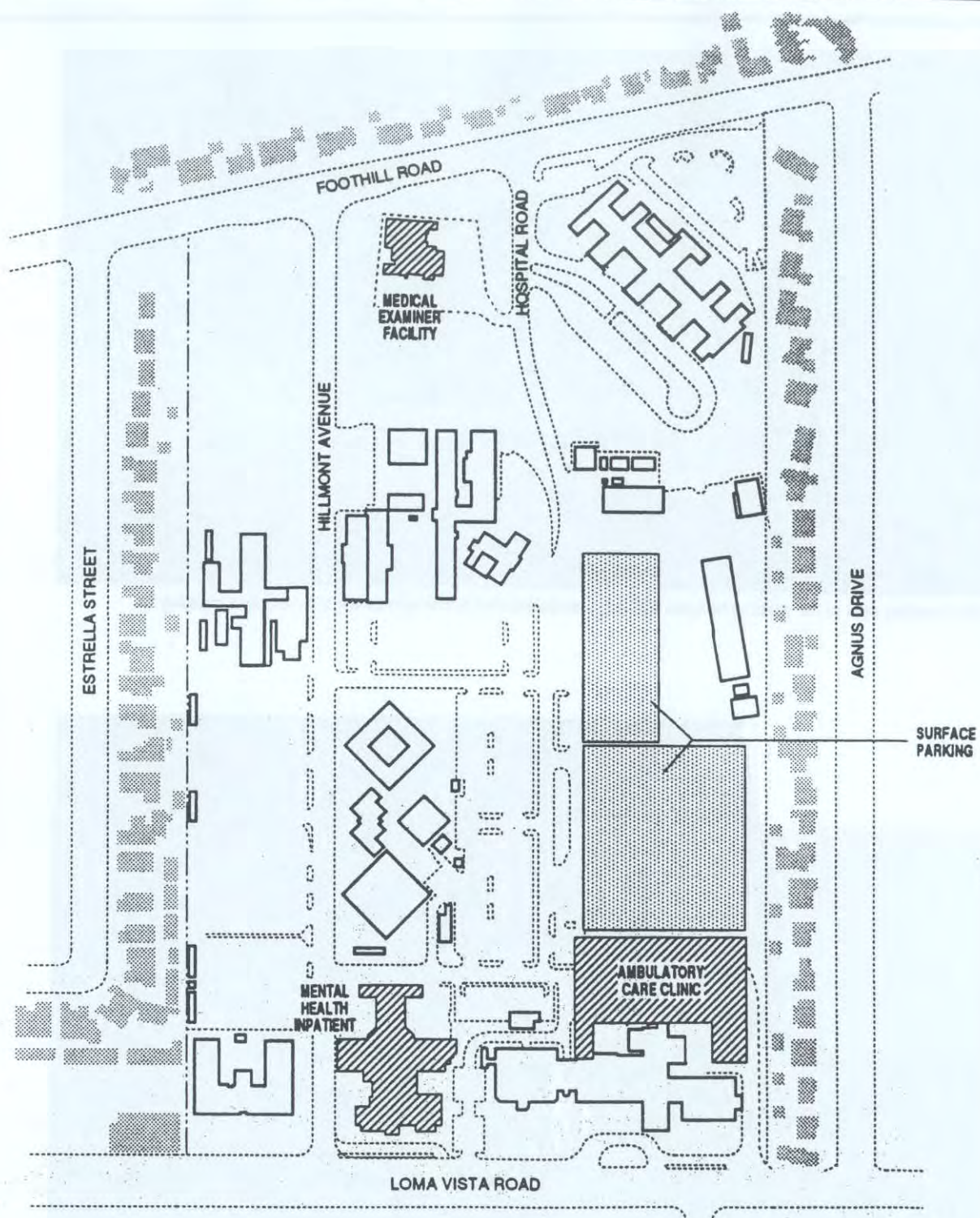
This alternative would entail the demolition of an additional 28,496 square feet of building area as compared to the project and the construction of an additional 33,000 square feet. Thus, the net increase in onsite building area would be 4,504 square feet greater than that which would occur under the proposed project, bringing the total increase to 66,619 square feet. The increase in onsite employment would be identical to that experienced under the proposed project.

7.1.5.1 Land Use

Under Alternative 4, the ACC structure would be three stories tall and would therefore be within the 45-foot (three-story) height limit for hospitals within the City of Ventura Zoning Ordinance. The ACC that would be constructed under this alternative could be considered incompatible with the use and scale of Agnus Drive residences, and therefore inconsistent with City land use policy. However, rather than adding a five-story structure on a site that currently houses one-story buildings, it would replace an existing structure of similar height. Consequently, no additional residences would be significantly affected.

Because this alternative would not include a multi-level parking structure, it would not present any potential new land use impacts associated with onsite parking. By comparison, portions of the proposed project structure would be visible from certain Agnus Drive residences while the structure would potentially generate compatibility problems related to noise impacts.

The three-story ACC and surface parking that would be constructed under Alternative 4 would have fewer land use impacts than would the proposed project's five-story ACC and three-level parking structure, from both compatibility and policy consistency standpoints. Consequently, overall land use impacts would be lower under this alternative.

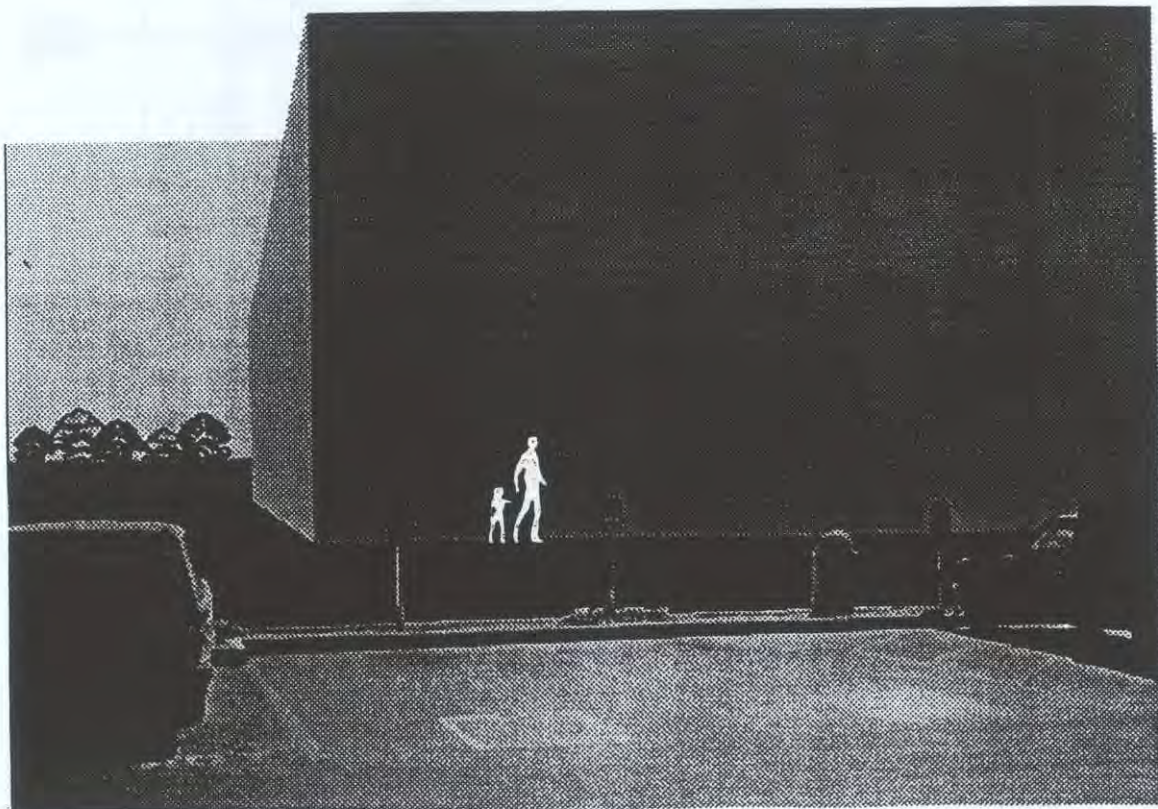


**ALTERNATIVE 4
SITE PLAN**

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View looking east at the existing hospital building and the kitchen & dining facilities from a VCMC parking lot.



View following implementation of Alternative Site Plan 4. The building in the foreground is the 3 story Ambulatory Care Clinic. This illustration depicts massing effect only. Window Treatment and Landscaping are not shown.

7.0 Alternatives

7.1.5.2 Aesthetics/Shadow/Light & Glare

Impacts associated with the Medical Examiner facility and Mental Health In-Patient Unit would be identical to those of the proposed project. The Medical Examiner facility would continue to be inconsistent with City policies related to the preservation of views from the Foothill Road scenic corridor.

By moving the ACC onto the site of the existing Old Building of the VCMC Hospital and reducing the height of the building to three floors, visual impacts to Agnus Drive residences would be reduced. Under this alternative, the ACC would be located on a site which currently houses a building of similar height. Therefore, no loss of views would occur to adjacent Agnus Drive residents. In addition, the reduced building height would reduce the potential for light and glare impacts to some degree.

The three-level parking structure that would be constructed under the proposed project would not substantially alter views from Agnus Drive residences. By replacing the three-level parking structure with surface parking, this alternative would eliminate any viewshed impacts associated with the structure. The potential for glare impacts from parked vehicles would be about the same as that of the proposed project or slightly greater due to the boiler plant obstruction and confinement of the parking structure. Lighting impacts may be marginally lower due to elimination of rooftop lighting for the structure.

This alternative would reduce visual, light, and glare impacts associated with the proposed ACC and parking structure. As such, it would have fewer overall aesthetic impacts.

7.1.5.3 Transportation and Circulation

The increase in onsite employment and offsite vehicle trips generated by Alternative 4 would be the same as that generated by the proposed project. Consequently, impacts to the local offsite circulation system would also be identical to those associated with the proposed project and no roadways would be significantly affected. Internal circulation impacts would also be identical to those of the proposed project. Overall transportation and circulation impacts would be comparable.

7.1.5.4 Air Quality

Because this alternative would entail the demolition of one additional structure (the Old Building of the Hospital) as compared to the proposed project, the area which would be disturbed during construction would be slightly greater. Consequently, overall fugitive dust emissions generated by project site construction activity under this alternative would be slightly greater than that generated by the proposed project.

The overall increase in vehicle trips to and from the site associated with Alternative 4 would be identical to that of the proposed project. The increase in vehicular air emissions

7.0 Alternatives

associated with this alternative would therefore be similar to that generated following implementation of the proposed project and would be less than County thresholds.

Under this alternative, proposed parking would be in approximately the same location as the proposed project's parking structure. Consequently, the impacts related to localized increases in carbon monoxide (CO) concentrations would be the same as those of the proposed project and would be less than significant.

Air quality impacts associated with long-term vehicular movement and the proposed parking structure would be similar to those of the proposed project while temporary impacts related to construction would be slightly greater. Therefore, overall air quality impacts associated with implementation of Alternative 4 would be slightly greater than those which would result from implementation of the proposed project.

7.1.5.5 Noise

Because it would entail the demolition and reconstruction of the Old Building of the VCMC Hospital, Alternative 4 would involve slightly more construction and slightly more demolition than the proposed project. Although noise levels experienced would be similar to those related to construction the proposed project, the duration of construction noise would be expected to be somewhat longer. Short-term construction noise impacts would therefore be slightly greater than those of the proposed project.

Traffic and traffic-generated noise associated with Alternative 4 would be identical to that generated by the proposed project. This alternative's parking lots would be in approximately the same location as the proposed parking structure. However, because residences along Agnus Drive would be shielded from noise to a greater degree under this alternative, noise impacts associated with parking would be slightly lower.

Short-term construction impacts would be slightly greater under Alternative 4 while long-term operational impacts would be slightly greater. Overall noise impacts associated with this alternative would therefore be about the same as those of the proposed project.

7.2 ALTERNATIVE SITES

Section 15126 of the *State CEQA Guidelines* state that an EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project." The California Supreme Court, in *Citizens of Goleta Valley v. Board of Supervisors* (1990), indicates that a discussion of alternative sites is needed if the project "may be feasibly accomplished in a successful manner considering the economic, environmental, social, and technological factors involved" at another site.

7.0 Alternatives

As suggested in *Goleta*, the alternative sites should be evaluated for feasibility according to the following criteria:

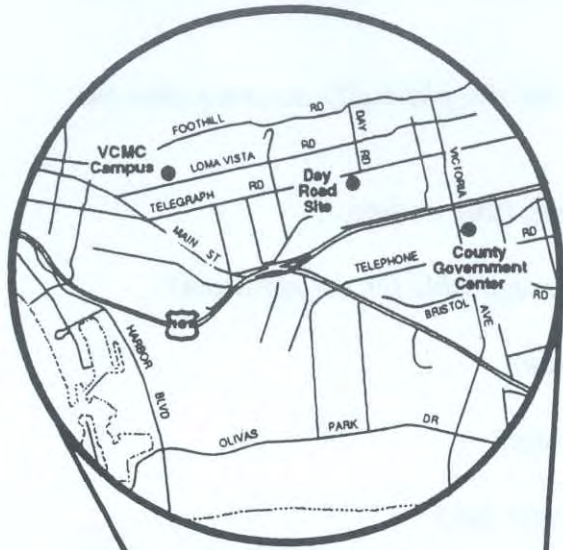
- 1) *Could the size and other characteristics of the site physically accommodate the project?*
- 2) *Is the site reasonably available for acquisition (sale or lease)?*
- 3) *Is the timing of carrying out the alternative reasonable for the applicant?*
- 4) *Is the project economically feasible on the site?*
- 5) *What are the land use designation(s) of the site?*
- 6) *Does the lead agency have jurisdiction over the site?*
- 7) *Are there any social, technological, or other factors which may make the site infeasible?*

The review of alternative sites that might be considered for the proposed project focused on County owned or long term leased sites and commercially available real estate that was large enough to accommodate the project. Of the four facilities proposed as part of the project, the ACC, parking structure, and Mental Health In-Patient Unit were originally considered for alternative locations due to concerns raised regarding the proposed project. However, the proposed parking structure supports parking requirements generated by existing as well as proposed facilities at the Ventura County Medical Center (VCMC). This portion of the project was therefore not considered as a facility to be relocated for the purposes of the alternative sites discussion. Consequently, alternative site locations have been considered only for the ACC and the Mental Health Unit, with parking at alternative site locations to support only ACC and Mental Health Unit needs.

The minimum site size for the Mental Health Unit is 1.8 acres while the minimum site size for the ACC is 3.2 acres. Of the sites owned or leased on a long term by the County, only the County Government Center and property adjacent to the State Hospital in Camarillo (referred to as the Lewis Road site) are large enough to receive consideration as alternative sites. In addition, a review of commercially available sites in the vicinity of the cities of Ventura or Oxnard revealed four sites of appropriate size and location to be considered as alternative sites.

7.2.1 County Owned/Leased Sites

The two county sites considered are the 80-acre County Government Center and a 44-acre property adjacent to the Camarillo State Hospital on Lewis Road that is currently on long-term lease by the County. The Government Center is located at 800 South Victoria Avenue in



**ALTERNATIVE
SITE LOCATIONS**

000430

7.0 Alternatives

the City of Ventura, approximately four miles east of the proposed project site. The Lewis Road site is located at the intersection of Cawelti and Lewis Road in the unincorporated area of Ventura County. It is approximately 14 miles southeast of the proposed project site (see Figure 7.2-1). The most likely site for future development at the Government Center is the parking area due east of the Hall of Justice Courts Building. At the Lewis Road site, the southeast quadrant of about 10 acres could potentially be developed.

The following discussion analyzes the feasibility of implementing the proposed project at these two sites, according to the factors identified in Goleta.

- 1) *Could the size and other characteristics of the sites physically accommodate the project?* Both the Government Center and Lewis Road sites are large enough to physically accommodate the proposed ACC or Mental Health Unit projects. Both sites are also relatively flat and pose no constraints to development.
- 2) *Is the site reasonably available for acquisition (sale or lease)?* The site at the Government Center is owned by the County and is therefore reasonably available. The site at Lewis Road is on a 50-year lease which will expire in 2040. Consequently, it is also reasonably available for development.
- 3) *Is the timing of carrying out the alternative reasonable for the applicant?* The construction of the Mental Health Unit is projected to begin in January 1994. Currently allowed uses of the Lewis Road site include housing or the operation of residential care. Therefore, the lease between the state and Ventura County would have to be modified by legislative action and the facility design would need to be altered to adapt to the site. Consequently, project implementation, if allowed at all, would be delayed and the County's needs would not be met. Therefore, the timing of carrying out the project at this alternative site does not appear to be reasonable. The ACC design would also have to be site adapted, thereby delaying the design completion and 1995 construction start at the Lewis Road site.

At the Government Center the two facilities would also have to be redesigned and site adapted to the alternative site, causing unreasonable delays for the construction of the Mental Health Unit, and perhaps the ACC.

- 4) *Is the project economically feasible on the site?* One of the primary reasons for locating the projects on the VCMC campus is the concentration of population and urban infrastructure in the area, including private medical practices. The Lewis Road alternative site is a rural and agricultural area located a relatively long distance from any urban center. Thus, implementation of the project at that location would increase costs associated with commuting and transportation. For these reasons, the proposed project is not economically feasible at the Lewis Road site.

7.0 Alternatives

The Government Center site is in an urban setting which has commuting and transportation advantages that the Lewis Road site does not have. The Government Center is, however, a densely populated and developed site and the infrastructure impact of placing either or both of the projects at this site would be considerable. The combination of losing existing parking spaces to site the project(s) and increased traffic and parking generated by the project(s) would require significant upgrades to parking capacity, and to secondary and interior roads serving the Government Center. For this reason, implementation of the project at this site is not economically feasible.

For either of the sites there is an additional economic burden on the project(s). The location of these projects at the VCMC affords use of the other health care services which are either required by medical licensing or highly desirable for effective and efficient health care. Blood bank, blood typing, medical laboratory, cafeteria, dietary food services, emergency room services, and other functions are essential or highly desirable services which would have to be duplicated to some degree at these other sites to adequately support the project(s).

- 5) *What are the land use designation(s) of the site?* The Lewis Road site is zoned as State/Federal Facility. The State Department of General Services has leased the property which is within the boundaries of Camarillo State Hospital to Ventura County for the purposes of constructing housing or operating residential care services. The site is within the Area of Interest for the City of Camarillo but outside the City's Sphere of Influence. Under the Ventura County Guidelines for Orderly Development, urban development is allowed outside a city's sphere of influence only at the discretion of the County of Ventura. For these reasons, implementation of the project at the Lewis Road site would be inconsistent with County land use policy.

The Ventura County Government Center is located within the City of Ventura and its Sphere of Influence and is zoned as R1-1AC (Residential - 1 Acre). Among other things, this zoning allows governmental services including municipal and county administrative functions and is a permitted use by right. The proposed project would be consistent with this zoning.

- 6) *Does the lead agency have jurisdiction over the site?* The Public Works Agency of the County of Ventura is the lead agency for the proposed project. In as much as the Lewis Road site is leased from the State, the lead agency does not have jurisdiction over that site. The Government Center site is within the jurisdiction of the lead agency.
- 7) *Are there any social, technological, or other factors which may make the site infeasible?* There are factors which disadvantage both alternative sites for either

7.0 Alternatives

project. The Mental Health In-patient service operates under the medical license of the General Hospital at the VCMC and insures immediate access to acute primary medical treatment for mental health patients. This treatment is not available at either of the alternative sites, thereby making the project not medically licensable without additional extensive facilities. At either site Mental Health Services would be a split operation between the out-patient and administrative services at the VCMC and the in-patient services at an alternative location. This would create operational inefficiencies that would not occur if the In-patient unit was constructed at the VCMC campus.

In regard to the ACC, the VCMC has established several satellite primary care clinics in the County and is in the development stage for several more clinics. The County Health Care Agency direction is to provide more localized access to primary care for the County through these satellite clinics and concentrate on the more specialized primary care out-patient services at the VCMC. The Ambulatory Care Clinic would fulfill that specialized care with ready access to more specialized services at the VCMC. At either alternative site location, this direction in health care treatment is negated.

Specifically at the Lewis Road site on State leased land, the siting of the Mental Health In-patient Unit would classify the unit as a public institution. As a public institution, acute psychiatric hospitalization is not Medicaid reimbursable. Given that over 50% of the unit patients are Medicaid recipients, location of the Mental Health Unit at the Lewis Road site is infeasible.

At the Government Center, the primary issue for both projects is the mixing of governmental functions at a single site. Unlike the Lewis Road site, the Government Center is a center of Administrative and Judicial business for the county. The addition of health care services for the County at the Government Center and the splitting up of those services from the VCMC is inefficient, and in the case of the Mental Health Unit, potentially incompatible. Given the anxiety and disorientation of many of the mental health patients, their participation in the programs is partially based on the neutrality or comfortable atmosphere of the facility's setting.¹ Placing the primary mental health in-patient service adjacent to the main judicial and pre-trial detention services for the County could effectively discourage much of the voluntary patient participation and use of the facility.

Implementation of the project(s) as proposed at either of the two county owned/leased sites would be infeasible as discussed above for the following reasons:

Lewis Road Site - 1) The timing is not reasonable for the applicant; 2) the projects would not be economically feasible; 3) the projects would not be allowed under current land use designation in the lease; 4) the lead agency does not have jurisdiction over

7.0 Alternatives

the site; and 5) the site would split the operation of health care services, thereby reducing efficient delivery of services and the desirable synergistic effects of consolidated specialized medical facilities at the VCMC.

County Government Center - 1) The timing is not reasonable for the applicant; 2) the projects would not be economically feasible; and 3) the site would split the operation of health care services, thereby reducing efficient delivery of services and the desirable synergistic effects of consolidated specialized medical facilities at the VCMC.

7.2.2 Commercially Available Sites

A list of commercially available sites was compiled using the following parameters:

- The site would be undeveloped other than utility or street access.
- The site would be within or immediately adjacent to the cities of Oxnard or Ventura.
- The site would be 2 to 5.5 acres in size.
- The site was or could be zoned for medical uses as contemplated under the project.

Based on the first three criteria, four sites were available. However, of these four, only one may currently allow medical uses. For this reason, as well as because of its appropriate size for both facilities and because it is the closest of the four to VCMC campus, this site was chosen as representative of commercially available sites for the purposes of analysis. The site is a 5.22-acre parcel at the intersection of Telegraph and Day Road in Ventura and will hereafter be referred to as the Day Road site. The site is in the City of Ventura, one mile east of the VCMC and across the street from the eastern half of the Ventura College campus (see Figure 7.2-1).

The following discussion analyzes the feasibility of implementing the proposed project at the Day Road site, according to the factors identified in *Goleta*.

- 1) *Could the size and other characteristics of the site physically accommodate the project?* The Day Road site encompasses 5.22 acres of relatively flat land. The size and other characteristics of the site could physically accommodate both the Mental Health Unit ACC.
- 2) *Is the site reasonably available for acquisition (sale or lease)?* The site is on the real estate market for sale and is therefore reasonably available.

7.0 Alternatives

- 3) *Is the timing of carrying out the alternative reasonable for the applicant?* The designs of the two projects would have to be site adapted to conform to the new site. In the case of the Mental Health Unit, this would result in an unavoidable delay to the project construction start date of January 1994. Site adaptation of the ACC would cause a delay in completing the design and the final design would not be complete in time to be eligible for supplemental state project funding under SB 1732. Therefore, the timing of carrying out the projects at this alternative site does not appear to be reasonable.
- 4) *Is the project economically feasible on the site?* The site is essentially undeveloped and would require infrastructure beyond the scope of the currently proposed project to adequately support both the ACC and Mental Health Unit. The land cost would add about \$2.3 million to the costs of the projects as originally proposed. For these reasons, implementation of the proposed project is not economically feasible at the Day Road site.
- 5) *What are the land use designation(s) of the site?* The entire site is currently zoned by the City of Ventura as R1-7 (Residential-Single Family 7,000 square-foot minimum lot size). In the City's Comprehensive Plan Updated to the Year 2010, this site is further designated as PMXD (Planned Mixed Use Development). Hospitals and professional office buildings would be allowed under this zoning and land use designation.
- 6) *Does the lead agency have jurisdiction over the site?* The entire Day Road site is within the City of Ventura. Therefore, the lead agency, County of Ventura, Public Works Agency, currently has no jurisdiction over the site. If, however, the site were purchased by the County, the lead agency would have jurisdiction.
- 7) *Are there any social technological, or other factors which may make the site infeasible?* There are disadvantages to siting either facility at the Day Road site which are similar to those associated with siting the project at the Lewis Road or Government Center sites. Mental Health Unit licensing at a location other than the VCMC would require additional extensive facilities over those included in the proposed project scope. Operations at Mental Health Services would also be split between the VCMC and this site, thus creating operational inefficiencies that would not occur under the proposed project. Development of the ACC at a site other than VCMC negates the advantages of the concept of satellite clinics with more specialized treatment of out-patients at the VCMC in the ACC.

Implementation of the project as proposed at the Day Road site would be infeasible, as discussed above, for the following three reasons:

- 1) The timing does not appear to be reasonable for the applicant.

7.0 Alternatives

- 2) The project is not economically feasible.
- 3) The site would split the operation of health care services, thereby reducing efficient delivery of services and the desirable synergistic effects of consolidated specialized medical facilities at the VCMC.

7.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The *State CEQA Guidelines* require identification of the Environmentally Superior Alternative among those alternatives analyzed. Because no offsite alternatives to the proposed project were found to be feasible, this analysis will focus on the onsite alternatives discussed in Section 7.1.

Table 7.3-1 presents a comparison of the impacts of each alternative to those of the proposed project for all of the environmental issue areas studied in this EIR. As the figure illustrates, all of the alternatives would be superior to the proposed project from a land use standpoint while all other than the No Project Alternative would be superior in terms of aesthetic impact. Only the No Project Alternative and Alternative 1 would be superior from a transportation standpoint and only the No Project Alternative would be superior for air quality and noise.

Table 7.3-1. Comparison of Onsite Alternatives to the Proposed Project

Alternative	Land Use	Aesthetics/ Shadow/ Light and Glare	Transportation and Circulation	Air Quality	Noise
No Project	-	=	=	-	-
Alternative 1	-	-	-	=	=
Alternative 2	-	-	=	+	+
Alternative 3	-	-	=	=	=
Alternative 4	-	-	=	+	=

- Impact is lower than that of the proposed project.
- = Impact is the same as that of the proposed project.
- + Impact is greater than that of the proposed project.

Table 7.3-2 presents the environmentally superior alternative for each issue area. As the figure shows, the No Project Alternative would be the environmentally superior alternative for air quality and noise, while Alternative 4 would be environmentally superior for land use and aesthetics, and Alternative 1 would be superior from a transportation standpoint. Because the No Project Alternative would be environmentally superior for two issues and would not have impacts greater than those of the proposed project for any issue (see Figure 7.3-1), it is considered the overall Environmentally Superior Alternative. Among the remaining alternative scenarios, either Alternative 4 (as the overall superior alternative for two areas) or Alternative 1 (as the overall

superior for one area and the superior among the remaining alternatives for two areas) could be considered the overall superior alternative. However, Alternative 4 is selected as the Environmentally Superior Alternative among the remaining scenarios because the issues for which its impacts are relatively high (air quality, noise) are temporary in nature while its relatively beneficial land use and aesthetic impacts would be permanent.

Table 7.3-2. Environmental Superior Alternative

Alternative	Land Use	Aesthetics/Shadow/Light and Glare	Transportation and Circulation	Air Quality	Noise
Proposed Project					
No Project				+	+
Alternative 1			+	✓	✓
Alternative 2					
Alternative 3				✓	✓
Alternative 4	+	+			

- + Environmentally superior alternative for a given issue area.
- ✓ Environmentally superior alternative among the remaining alternatives if the No Project Alternatives is superior overall.

7.4 ALTERNATIVES VIABILITY

This subsection discusses the capability of each of the onsite project alternatives to meet the objectives of the proposed project, as described in Sections 3.5 and 3.6 of the Project Description. The discussion has been provided by the County Health Care Agency.

7.4.1 No Project

The No Project Alternative perpetuates the inefficient delivery of health care services in facilities that are seismically unsafe, operationally inefficient and difficult to maintain. The excessive age and condition of these existing facilities is a significant detractor to the quality care deserved by the public and the no project alternative is not considered a viable option.

The No Project Alternative also continues the ineffective and inconvenient parking situation on the campus for patients, as well as health care professionals, through the excessive dispersal of parking spaces throughout the campus.

7.4.2 Alternative Site Plan 1

Alternative 1 would have a significant impact on the ability of the Mental Health Services to carry out its services. The location of the two-level parking structure would eliminate several key permanent buildings which the Mental Health Services was relying upon to use. The buildings that would be removed are to provide meeting, training, and conference room space for

7.0 Alternatives

the entire staff which is not available in the new proposed project nor in any other building in the Mental Health Services. Also eliminated would be the main reception building for visitors to the Mental Health Services department and the staff of the administrative and support services of the department. This alternative for a two-story versus a three-story parking structure would diminish the beneficial effects of consolidating 500 parking spaces in one location, as discussed in the Project Objectives/Needs. This alternative would also have the detrimental effect of placing the parking structure immediately adjacent to an inpatient acute care function. The patients at this facility can be expected to be abnormally sensitive to noise and light as compared to the thresholds of other than acutely ill mental health patients.

7.4.3 Alternative Site Plan 2

Alternative 2 would have the same diminishment of beneficial effects for the campus parking situation as noted under Alternative 1. The parking structure site for this alternative is also a less efficient shape for easily negotiable parking. However, by moving the two and one-half story parking structure farther away from the Mental Health Inpatient Unit project, the impact of noise and light on the patients at the Unit would be somewhat reduced beyond that noted in alternative Site Plan 1.

7.4.4 Alternative Site Plan 3

Alternative 3 would not meet several of the project objectives for the ACC and the Mental Health In-Patient Unit. Placing the ACC away from the main hospital would require the duplication of medical laboratory and blood bank services in the hospital and in the ACC. The location of the kitchen and dietary functions away from the hospital would also increase the cost of delivering these services. The ACC location would also diminish the delivery of health care services and the immediate access of staff and patients between the ACC and hospital. Overall this alternative increases the cost of design and construction of the project and the cost of operations and maintenance for the facilities.

In addition, this alternative would not meet primary objectives of the Mental Health Unit expansion. The unique and distinctive character of mental health care services dictates development of facilities in the immediate vicinity of the hospital in physically separate buildings but within easy and immediate access to the emergency room of the hospital. This alternative location would place the Mental Health Unit as a part of the hospital and without immediate access to the emergency room for patients and the Mental Health Services crisis intervention teams.

7.4.5 Alternative Site Plan 4

Alternative 4 would not meet the project objective of the Ambulatory Care Clinic to improve the delivery of health services within the near future. The removal of a significant portion of the existing hospital and the services and support contained therein in addition to the temporary relocation of functions as a result of the parking project would cause an unacceptably

7.0 Alternatives

high level of disruption of medical services. In addition, the cost of relocating these health services for about 2 years as well as the additional demolition, design and construction costs would make this alternative economically infeasible. The use of strictly surface parking at the VCMC does not meet the project objective of consolidating parking and reducing driving and walk time as well as more effective land use and traffic distribution.

¹ Ms. Penny Mathews, Director of Acute Care Services, Mental Health Services.

difficult to read. The text is very faint and appears to be a scan of a document. It is mostly illegible due to low contrast and blurring.

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8.1 REFERENCES

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8.0 References/Persons Contacted

Ventura County Resource Management Agency (1988 amended December 1992), *Ventura County General Plan Resources Appendix*

Ventura County Solid Waste Management Department (1992), *Guidelines for the Preparation of Environmental Assessments for Solid Waste Impacts.*

8.2 PERSONS CONTACTED

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This volume contains the papers presented at the International Conference on the Role of the State in Economic Development, held in Mexico City, Mexico, in 1985. The papers are arranged in the order in which they were presented.

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Editorial Board: A. H. Khan, J. H. Korten, R. A. O. Anderson, J. H. Korten, R. A. O. Anderson, J. H. Korten, R. A. O. Anderson

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10.0 COMMENTS AND RESPONSES TO COMMENTS ON THE DEIR

In accordance with the requirements of the *State CEQA Guidelines*, Section 15132, this section presents written comments to the Draft Environmental Impact Report for the Ventura County Medical Center Expansion, and responses thereto. It also lists the speakers who provided oral testimony at the November 3rd and 17th Environmental Report Review Committee (ERRC) public hearings. If, as a result of the written commentary, revisions to the information presented in the EIR are warranted, text changes will be explained in the response.

The Final EIR must include responses to significant environmental points raised in the review and consultation process. Comments not relating to the adequacy of the EIR and significant environmental points do not require a written response. However, all written comments are presented here for consideration by the decision-makers in their project review and approval process.

10.1 LIST OF COMMENTORS ON THE DEIR

10.1.1 Public Agencies

1. California Department of Transportation - Wilford Melton, Senior Transportation Planner
2. California Environmental Protection Agency - John Loane, Associate Waste Management Specialist
3. Southern California Association of Governments - Eric H. Roth, Manager, Intergovernmental Review
4. Ventura County Air Pollution Control District - Brent Backus, Air Quality Specialist
5. County of Ventura, Resource Management Agency, Planning Division - Robert K. Laughlin, Commercial/Industrial Land Use Manager
6. Ventura County Fire Department
7. County of Ventura, Public Works Agency, Development and Inspection Services - Jim Fisher, Engineering Geologist
8. County of Ventura, Public Works Agency, Transportation Department - Steven J. Manz, P.E., Senior Engineer
9. City of Simi Valley, Department of Environmental Services - Laura C. Kuhn, Deputy Director/Advanced Planning

10. Comments and Responses to Comments on the DEIR

10. City of San Buenaventura - Steve Chase, Chairperson, EIR Committee
11. City of Oxnard, Community Development Department - Richard Maggio
Community Development Director
12. City of Oxnard - Samia Maximous, Traffic and Transportation Manager

Other Organizations and Individuals

13. Ventura County Alliance of Taxpayers - H.J. Robings, President
14. Myers, Widders and Gibson Attorneys at Law - William S. Gray
15. Mark Pachowicz
16. Dr. and Mrs. Wayne Bartel
17. Leslie A. Pollard
18. Mrs. Mildred A. Robinson
19. Venall Hordison

Written Comments Received at ERRC Hearings

20. Roger Beers (on behalf of Mark Pachowicz)
21. Jean Bartel
22. 10 Grove Street Homeowners
23. Jim Fisher, Development & Inspection Services, County of Ventura Public Works
Agency
24. Mark Pachowicz
25. Dave Wallace
26. Wayne Bartel
27. Jean Bartel
28. Mark Pachowicz

10. Comments and Responses to Comments on the DEIR

29. Robert and Virginia Burns

30. J. Jeffrey Herman, Esq.

Speakers at ERRC Hearings

November 3rd Hearing

Mark Pachowicz

Jere Robings

Bill Gray

Susan Peters

Wayne Bartel

November 17th Hearing

Jere Robings

Wayne Bartel

Dave Wallace

Jean Bartel

Mark Pachowicz

Bill Gray

Jim Farley

John Kilburn

10.2 COMMENTS AND RESPONSES

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Business, Transportation and Housing Agency
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Memorandum

To : Mr. Tom Loftus
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

Date : September 30, 1993

File No.: IGR/CEQA 9059
DEIR
Ventura County
Medical Center
Expansion
Co. of Ventura
Vic. VEN-101-28.21

From : Wilford Melton - District 7
DEPARTMENT OF TRANSPORTATION

Subject : Project Review Comments

SCH# 93041042

We have reviewed the above referenced document in regards to expansion of Ventura County Medical Center at the corner of Loma Vista Avenue and Hillmont Street in the City of Ventura.

Based on the information received, we recommend that the County of Ventura be responsible for financing of the improvement program (off-ramp widening at Route 101 and Route 126), for the cumulative project impacts. | A

Should you have any questions, please call me at (213) 897-1338.

Original Signed By

WILFORD MELTON
Senior Transportation Planner
IGR/CEQA Coordinator
Advance Planning Branch

CC: Mr. Alec Pringle
County of Ventura Department of Public Works
800 South Victoria
Ventura, CA 93009

JP

10. Comments and Responses to Comments on the DEIR

Commentor: California Department of Transportation - Wilford Melton, Senior Transportation Planner (Letter 1)

Date: September 30, 1993

Response:

- 1.A** As discussed in EIR Section 5.3.3, the Ventura County Medical Center is not currently required to participate in the City of Ventura's Traffic Mitigation Fee Program. However, under the Program, if any portion of the campus is leased to a private company in the future, that company may be required to contribute its "fair-share" for the cost of these improvements.

DEIR Public Review Comments

2

10/11

State of California

California Environmental Protection Agency

Memorandum

To : Mark Goss
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

Date: October 5, 1993

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ENGINEERING SERVICES

Alec Pringle
Ventura County Public Works Agency
80 South Victoria Avenue
Ventura, CA 93009

From :



John Loane, Associate Waste Management Specialist
Environmental Review Section
Permitting and Enforcement Division
California Integrated Waste Management Board

8800 Cal Center Drive
Sacramento, CA 95826

Subject: SCH # 93041042 - Draft Environmental Impact Report (DEIR) for the
Ventura County Medical Center Expansion Project, Ventura County.

The California Integrated Waste Management Board (CIWMB) staff have reviewed the DEIR for the proposed project cited above. In consideration of the California Environmental Quality Act (CEQA), Section 15205(c) CIWMB staff will focus the following comments on specific issues involving waste generation and disposal.

In order to help decision-makers 1) identify potential impacts from construction/demolition projects, 2) determine whether any such impacts are significant, and 3) ascertain whether significant impacts can be mitigated to a level of insignificance, CIWMB staff request that the Final Environmental Impact Report (FEIR) include the following information:

- A.) Identification of the final disposal site(s) for the proposed project's anticipated waste generation, both during construction phases and after project implementation, including, potential alternative methods for disposal (i.e. shredding of wood for hog fuel, composting of wood waste for beneficial reuse, agricultural amendment of sludge to land, etc.).

A

- B.) Identification of the anticipated types of solid waste (i.e. wood waste, concrete, metal, municipal solid waste, etc.) and estimated quantities of solid wastes to be disposed; both during construction phases and at project completion, including additional sludge from the wastewater treatment plant servicing the project, and mitigation(s) in the event that some of the waste generated by the project are determined to be *hazardous*. | B
- C.) Identification of the potential impacts of these quantities on the permitted average and peak daily tonnages of the intended disposal site(s). Including the calculated impact upon the landfill's remaining capacity and associated site-life if quantities are determined to be significant. | C
- D.) Identify any past or present areas of permitted or unpermitted landfilling and/or dumping at the proposed project's site location and how these areas will be remediated/mitigated. | D

Developments of new hospital complexes increase the amount of waste being sent to landfills. To minimize the amount of solid waste going into landfills, recycling and reduction efforts should be incorporated into the City's and/or County's Solid/Integrated Waste Management Plans. This will help to preserve the finite landfill space within the waste management jurisdiction, as well as to help achieve the mandates of the California Integrated Waste Management Act (AB 939) of 1989. CIWMB staff suggest that the following measures be incorporated into the project by the project proponent to help to achieve these mandates:

- A.) Implementation of a recycling program at the proposed construction site and commercial/industrial development complex. | E
- B.) Provide information to incoming tenants about the recycling services in the project area (i.e. office paper pick-up, cardboard pick-up, etc.). Identify buy-back/recycling centers and possible markets for recyclables in the area. Inform construction workers and future tenants of the need to recycle aluminum, glass, metal, paper, cardboard, plastic, tin cans, and other materials to the maximum extent feasible. | F
- C.) Utilize products (i.e. insulation) made from recycled materials in construction of project structures. | G
- D.) Include recycle storage areas into the design of the project's structures (i.e. interior and exterior storage receptacles for recyclable materials). | H

- F) Develop a composting area/program at the site to recycle grass clippings and greenwaste from the development's landscapes to be used as soil amendments and mulches for landscape maintenance and water conservation. | I

Thank you for the opportunity to review and comment on this project. CIWMB staff ask that you keep the Board apprised of solid waste generation, disposal, and source reduction/recycling issues associated with the planned development.

For assistance with local planning issues concerning compliance with AB 939 requirements, please contact Judith Friedman at (916) 255-2302 of the CIWMB's Office of Local Assistance; or if you have any questions regarding these comments or would like additional assistance from CIWMB staff, please contact me at (916) 255-2654.

10. Comments and Responses to Comments on the DEIR

Commentor: California Environmental Protection Agency - John Loane, Associate Waste Management Specialist (Letter 2)

Date: October 5, 1993

Response:

2.A Impacts to waste treatment/disposal facilities were analyzed in the detailed Initial Study that was prepared for the proposed project and included as EIR Appendix 1.2. As stated in Section 3.23 of the Initial Study, solid waste generated at the VCMC campus is currently deposited in the Bailard Landfill in Oxnard, California.

The Initial Study includes a number of project "design features" that are part of the EIR project description (see EIR Section 3.7). These features will be implemented by the VCMC in order to minimize impacts to waste disposal facilities and include mulching of grass clippings, development of an onsite or offsite composting program, purchase of a baler for breaking down cardboard boxes, and development of a County-approved plan for the diversion of construction/demolition wastes. Implementation of these features was determined to render the proposed project's impacts on waste disposal facilities less than significant under Ventura County Solid Waste Management Department guidelines. Thus, solid waste issues were not further examined in the EIR.

2.B A detailed breakdown of the types of solid waste anticipated to be generated by project implementation is included in Appendix C of the Initial Study, which is included in EIR Appendix 1.2. In addition, Section 3.18 of the Initial Study includes a discussion of onsite bio-medical waste generation. Also, please see response 2.A above.

2.C Potential impacts to solid waste disposal facilities were examined in the Initial Study for the proposed project and found to be less than significant with the incorporation of a number of design features which will minimize onsite solid waste generation. Also, please see response 2.A.

2.D No past or present unpermitted landfilling or dumping are known to have occurred on the VCMC campus. Therefore, no mitigation for any impacts associated with unpermitted dumping is required.

2.E As stated in the Initial Study for the proposed project (EIR Appendix 1.2) and in Section 3.7 of the EIR Project Description, the contractor that conducts project-related construction and demolition will be required to develop a

10. Comments and Responses to Comments on the DEIR

County-approved plan for the diversion of demolition/construction wastes from landfills.

- 2.F The County has adopted the RAP recycling program to begin waste reduction within County institutions. The program, run by the County Solid Waste Management Department, has implemented an education program involving every department at the VCMC campus. County waste bins are labeled for the purposes of pre-separating recyclable items from the waste stream. In addition, VCMC custodial staff have been educated about recycling.
- 2.G The County has several policies which encourage the use of recycled materials for construction and other uses. One encourages the use of recycled materials through a 10 percent price preference for qualified recycled materials. Another policy requires County purchasing personnel to consider the lifetime cost of products when shopping.
- 2.H The Initial Study for the proposed project (EIR Appendix 1.2) and Section 3.7 of the EIR Project Description include a project design feature requiring the provision of adequate space for waste and recycling bins for all new facilities, as determined by the Ventura County Solid Waste Management Department.
- 2.I As stated in the Initial Study for the proposed project (EIR Appendix 1.2) and in Section 3.7 of the EIR Project Description, proposed project implementation will include the development of an onsite or offsite composting program for organic compostable wastes generated on the VCMC campus. In addition, all grass clippings from campus lawns will be mulched rather than landfilled.

RECEIVED

SEP 20 1993

file
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Sent to F...
SCAG
SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
9/20

518 West Seventh Street, 12th Floor • Los Angeles, California 90017-3435 • (213) 236-1800 • FAX (213) 236-1825

3

September 17, 1993

Mr. Alec Pringle
County Of Ventura Public Works Agency
800 S. Victoria Avenue
Ventura, CA 93009

RE: SCAG Clearinghouse #: I9300460
Project Title: Ventura County Medical Center Expansion Project

Dear Mr. Pringle:

We have reviewed the above referenced document and determined that it is not regionally significant per Areawide Clearinghouse criteria. Therefore, the project does not warrant clearinghouse comments at this time. Should there be a change in the scope of the project, we would appreciate the opportunity to review and comment at that time.

A description of the project will be published in the October 1, 1993 Intergovernmental Review Report for public review and comment.

The project title and SCAG number should be used in all correspondence with SCAG concerning this project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact Maureen Farley at (213) 236-1886.

Sincerely,

Eric H. Roth

ERIC H. ROTH
Manager, Intergovernmental Review

000457
Lodi Vasquez Orange County-President, Stella Mendoza City of Brawley-First Vice President, Ed Edelman Los Angeles County-Second Vice President, John Longville City of Rialto-Past President • Richard Alarcon City of Los Angeles, Richard Alatorre City of Los Angeles, Robert Bartlett City of Monrovia, George Bass City of Bell, Ronald Bates City of Los Alamitos, George Battey, Jr. City of Burbank, Hal Bernson City of Los Angeles, Walter Bowman City of Cypress, Marvin Braude City of Los Angeles, Susan Brooks City of Rancho Palos Verdes, Art Brown City of Buena Park, Yvonne Brathwaite-Burke Los Angeles County, Jim Busby, Jr. City of Victorville, Bob Buster Riverside County, Laura Chick City of Los Angeles, John Cox City of Newport Beach, Cynthia Crothers City of Moreno Valley, Elmer Digneo City of Loma Linda, Richard Dixon City of Lake Forest, Douglas Drummond City of Long Beach, Jerry Eaves San Bernardino County, John Ferraro City of Los Angeles, John Flynn Ventura County, Terry Frizzel City of Riverside, Ruth Galanter City of Los Angeles, Sandra Genis City of Costa Mesa, Jackie Goldberg City of Los Angeles, Candace Haggard City of San Clemente, Garland Hardeman City of Inglewood, Robert Hargrave City of Lomita, Mike Hernandez City of Los Angeles, Nate Holden City of Los Angeles, Robert Jamison City of Artesia, Jeff Kellogg City of Long Beach, Jim Kelly City of South El Monte, Richard Kelly City of Palm Desert, Bob Kuhn City of Glendora, Abbe Land City of West Hollywood, Darlene McBane City of Long Beach, John Melton City of Santa Paula, Barbara Messina City of Alhambra, Judy Mikel City of Simi Valley, David Myers City of Palmdale, Kathryn Nack City of Pasadena, Beverly Norton, Gwenn Norton-Perry City of Chino Hills, Ronald Parks City of Temecula, Irv Pickler City of Anaheim, Michael Plisky City of Oxnard, Beatrice Proo City of Pico Rivera, Larry Quinn City of Montclair, Dick RJordan City of Los Angeles, Mark Ridley-Thomas City of Los Angeles, Albert Robles City of South Gate, Sam Sharron Imperial County, Rudy Sporn City of Los Angeles, Bob Stone City of Bellflower, Thomas Sykes City of Walnut, Jeff

10. Comments and Responses to Comments on the DEIR

Commentor: Southern California Association of Governments - Eric H. Roth, Manager, Intergovernmental Review (Letter 3)

Date: September 17, 1993

Response: The Southern California Association of Governments states that it has determined that the proposed project is not regionally significant per Areawide Clearinghouse criteria. No response is necessary.

DEF file copy
Public Review Person comments
4

RECEIVED

SEP 30 1993

ENGINEERING SERVICES

COUNTY OF VENTURA
RESOURCE MANAGEMENT AGENCY/APCD

Memorandum

TO: Alec Pringle, Public Works Agency

DATE: September 29, 1993

FROM: Brent Backus, APCD

SUBJECT: Draft Environmental Impact Report (EIR) for the Ventura County Medical Center

Air Pollution Control District staff has reviewed the subject project and offers the following comments:

Page 5.4-8: First paragraph, last sentence, states that the construction impacts exceed the APCD 25-pound threshold. As previously stated in this document (page 5.47) construction impacts are not applicable towards the 25-pound threshold. This sentence should be deleted.

A

Page 5.4-12: Mitigation AQ- 9 should be deleted. VCMC has a trip reduction plan on file with the APCD.

B

If I can be of further assistance, please contact me at 805/645-1428.

10. Comments and Responses to Comments on the DEIR

Commentor: Ventura County Air Pollution Control District - Brent Backus, Air Quality Specialist (Letter 4)

Date: September 29, 1993

Response:

4.A In response to this comment, the last sentence of the first paragraph of EIR page 5.4-8 will be deleted.

4.B In response to this comment, Mitigation Measure AQ-9 will be deleted, and the following text will be added to Section 5.4.1.2, Site-Specific Setting:

As part of an effort to comply with the Ventura County AQMP in the area of overall vehicular trip reduction, the VCMC prepared and has filed a trip reduction plan with the APCD.

DEIR "Displacement Period File"

County of Ventura

PLANNING DIVISION

MEMORANDUM

5

RECEIVED
OCT 12 1993
ENGINEERING SERVICES

DATE: October 12, 1993
TO: Alex Pringle, PWA Project Manager
FROM: Robert K. Laughlin, RMA Commercial/Industrial Land Use Manager

SUBJECT: VCMC Expansion Project Draft Environmental Impact Report

Per your memorandum of September 13, 1993, requesting comments and questions on the above draft EIR; the comments below are provided. Please note that our review did not include Section 5.3, Transportation and Circulation, nor Section 5.4, Air Quality.

1. Page 1-1, Section 1.2 SCOPE AND CONTENT - The last paragraph refers to minor revisions to the proposed project. Have the changes in building square footage, parking spaces and demolition of structures changed in the text, tables, etc., which follow in the document? Reader should be clear if these changes are reflected in this document; or were they dismissed by the EIR authors. | A
2. Page 2-1, Section 2.2 AREAS OF PUBLIC CONTROVERSY - This paragraph does not address the April 27, 1993, meeting hosted by the County of Ventura. We believe more issues than just land use and aesthetics were raised. PWA should confirm this. | B
3. Page 3-4, Section 3.4 PROPOSED ACTIONS - Second paragraph does not appear to list all the buildings to be removed from the site. | C
4. Page 3-5 and 3.5, Figure 3.3-1 or 3.4-1 - Where is PSSA building? | D
5. Page 3-7, Figure 3.4-2 - Is Building 360 (Coroners) to be removed? | E
6. Page 3-9, Figure 3.4-3 - Why are no elevations of the other structures provided to the reader? | F
7. Page 5.2-7, Section 5.2.1.3 LIGHT AND GLARE - Text refers to glare being generated from sunlight only. Glare is also caused by high intensity exterior lighting or by reflection from certain types of surfaces. | G
8. Page 5.2-8, Figure 5.2-5 - Note refers reader to Figure 5.2-10 which could not be located in draft reviewed. | H

9. Page 5.2-22, Section AES-5 PARKING STRUCTURE WALLS/LANDSCAPING - The copy of page 5.2-18 refers to the potential to cause undesired lighting into adjacent residential uses. Should this mitigation measure not address lighting issues? | I
10. Page 5.2-23, Section 5.2-4 RESIDUAL IMPACTS - AES-3 refers to undergrounding of utilities. Does not appears to address light spillage. | J
11. Page 5.5-4, Section 5.5.2.1(b) SIGNIFICANCE THRESHOLDS - Reference is made to a one (1) year level of significance as a City of Ventura standard. However, page 5.2-11 states that construction will occur for 3 years. If construction projects overlap their activity, could they exceed one year thus exceeding the noise threshold of the City and County? | K
12. Page 7-9, Section 7.1.3.2 AESTHETICS/SHADOW/LIGHT AND GLARE - Third paragraph states that the construction of the Medical Examiner facility would continue to be inconsistent with County and City policies related to view preservation. Section 5.2 does not state that the Medical Examiner facility is inconsistent with City Policies (County policies regarding aesthetics are not addressed in Section 5.2). | L
13. Page 7-23, Section 7.2.1-3 COUNTY OWNED/LEASED SITES - Discussion of the facilities being built on the Government Center property refers to redesign causing "unreasonable delays". Statement is unclear as to just what is "unreasonable". What is functional Basis of Delays? | M
14. Page 7-24, Section 7.2.1-5 - COUNTY OWNED/LEASED SITES - The Lewis Road site is not zoned "State/Federal Facility." This term is a General Plan Land Use designation. Also, the statement regarding the County Guidelines for Orderly Development and County Land Use Policy may not be an accurate statement inasmuch as the County can make such a land use decision on a case by case basis. | N
15. Page 7-25, Paragraph 4, Although splitting up health care services can be clearly shown to be inefficient. The second point regarding mental health patients need for a "comfortable atmosphere" should be supported with factual evidence of some type, or qualified by some principal in mental health care. | O

As a general comment, it would be helpful to the reader to have an indication on the figures to show from which direction a photograph was taken from. Also, where a "policy" is referred to; it is suggested that it be stated in full or refer the reader to where it can be found within the document. | P

Should you have any questions regarding the above, please feel free to call either Pat Richards (5193) or Janna Minsk (5035).

RKL:nf

10. Comments and Responses to Comments on the DEIR

Commentor: County of Ventura, Resource Management Agency, Planning Division - Robert K. Laughlin, Commercial/Industrial Land Use Manager (Letter 5)

Date: October 12, 1993

Response:

5.A The minor revisions to buildout of the proposed project that occurred after the preparation of the Initial Study were incorporated into the EIR Project Description. Because these revisions all involved reductions in project buildout, it was determined that no potentially significant impacts beyond those identified in the Initial Study would occur.

5.B Although other issues (air quality, noise) were discussed at the April and July public meetings and in responses to the NOP, the majority of the environmental concerns revolved around land use and aesthetic issues related to the proposed ambulatory care clinic and parking structure.

5.C The second paragraph of EIR Section 3.4 does not list each individual building that would be demolished as part of project implementation. Rather, it lists groups of buildings that will be demolished. A comprehensive list of all buildings to be demolished and their locations is, however, provided on EIR Figure 3.4-1.

5.D The former PSSA Building, now known as the HCA Business Office, is Building 332 as illustrated on Figure 3.3-1. The building is located at the northeast corner of the Loma Vista Road/Hillmont Avenue intersection. The building would be demolished prior to construction of the new Mental Health In-Patient Unit.

In response to this comment, the text of EIR section 3.4 will be revised to correctly identify the PSSA building as the HCA Business Office.

5.E As shown in EIR Figure 3.4-1, the existing Coroners facility (Building 360) would be removed as part of the proposed project. The demolition of this building was included in all project buildout calculations.

5.F Elevations for the Mental Health In-Patient Unit, Medical Examiner facility, and parking structure were not available at the time of Draft EIR preparation. A simulation of the view of the Medical Examiner facility is, however, provided in EIR Figure 5.2-6. Although final site plans for the proposed three-level parking structure are not yet completed, the structure generally would not be visible from any public viewing areas, other than from a stretch of Hillmont Avenue, which currently functions as a VCMC access road.

10. Comments and Responses to Comments on the DEIR

- 5.G The first paragraph of EIR Section 5.2.1.3 discusses the fact that glare can be produced by reflection from such surfaces as asphalt parking lots, and glazed and metallic surfaces. Nighttime lighting impacts related to high intensity exterior lighting are discussed in the second paragraph of Section 5.2.1.3.
- 5.H The View Orientation Map referenced is contained in EIR Appendix 5.2. Figure 5.2-5 has been revised to reflect this fact.
- 5.I The referenced mitigation measure does address potential vehicle lighting impacts from the proposed parking structure. In a response to comment 16.G, an additional mitigation measure (AES-6) has been proposed that would address nuisance lighting from roof-level parking structure lighting. Please see response to comment 16.G, below.
- 5.J The appropriate measure to be referenced is AES-5 and the now included AES-6, the text of EIR Section 5.2.4 has been revised to reflect this fact.
- 5.K The referenced threshold is not a City of San Buenaventura standard. The text states that for purposes of this EIR, construction noise is considered significant if it would cause a continuous exceedance of the City's CNEL threshold for a period of 1 year or longer. No continuous exceedance of the City's threshold levels are expected to extend over a 1 year period.
- 5.L In response to this comment, the third paragraph of Section 7.1.3.2 will be revised to read as follows:
- The proposed Medical Examiner facility would also be in the same location as that of the proposed project. Consequently, viewshed impacts would be the same. Because only 20 percent of the frontage would be affected, viewshed would not be significantly affected and a City policy inconsistency would not result.*
- 5.M The construction of the Mental Health Unit is projected to begin in 1994. The design for that project was completed in July 1993. The ACC is currently in the preliminary design stage with its configuration and services based on its location at the VCMC. The relocation of these two projects to the Government Center would require significant redesign of the Mental Health Unit and ACC to adapt to these new sites. This redesign would cause a substantial 9-12 month delay in construction start of the Mental Health Unit and a 6-8 month delay in design completion and 1995 construction start. Project implementation would be delayed and the County's objectives would not be met.

10. Comments and Responses to Comments on the DEIR

- 5.N The land use designation of the Lewis Road site is "State/Federal Facility." The County could decide to allow the use of the site for project development; however, the County would also need concurrence and approval from the State Department of General Services to modify the property lease for this purpose.
- 5.O The need for a "comfortable atmosphere" is a professional opinion of the Director of Acute Care Services, Mental Health Services, Ventura County. Footnote added to page 7-25 as follows:
- ¹ Ms. Penny Mathews, Director Acute Care Services, Mental Health Services.
- 5.P A View Orientation Map is contained in EIR Appendix 5.2. The affected figures have been revised to reflect this fact. City of Ventura Community Design Element policies are presented in section 5.2, Aesthetics/ Shadows/Light and Glare, on pages 5.2-18, 19, and 20.

DEIR

Publ. - Review Period comments

CP 92-33
95056

6

9/27

COUNTY OF VENTURA
PUBLIC WORKS AGENCY
ENGINEERING SERVICES DEPARTMENT
Memorandum

September 13, 1993

RETURN TO

To: Distribution List
From: Alec Pringle
Subject: VCMC EXPANSION PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

1. The attached DEIR has been submitted to the State Clearinghouse with a requested review period of 15 September - 29 October 1993. The Environmental Report Review Committee is then scheduled to review the DEIR at a 1:30 p.m., 3 November 1993 meeting in the third floor Multipurpose Room #334 of the Hall of Administration.
2. Your comments and questions should be directed to me at 654-2083. Please submit any written comments by 14 October.

ATP/kp

Distribution List:

- Mr. Art Goulet
- Mr. Bob Quinn
- Mr. Larry Tanouye
- Mr. Dick Miller
- Mr. Bob Brownie
- Mr. Bob Laughlin (5 copies)
- Ms. Jonette Duchai (3 copies)
- Mr. Randy Feltman (2 copies)
- Dr. Ron O'Halloran
- Fire Protection District
- Solid Waste Management District
- Air Pollution Control District

NO ADDITIONAL
COMMENTS

[Signature]
VCFD P-19
9-27-93

Ref: CVRLTR.REV

000466

10. Comments and Responses to Comments on the DEIR

Commentor: Ventura County Fire Department (Letter 6)

Date: September 13, 1993

Response: The memo indicates that the Department has no further comments on the EIR.

A
B
C

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[Faint signature or stamp]

DE - Public Review Period
File

7

COUNTY OF VENTURA
PUBLIC WORKS AGENCY
DEVELOPMENT & INSPECTION SERVICES
800 South Victoria Avenue
Ventura, CA 93009
(805) 654-2030

DATE: October 13, 1993
TO: Rich Guske
FROM: Jim Fisher
SUBJECT: GEOLOGY REVIEW: DEIR for VC Med. Center
REFERENCE: WT98889

I have completed a review of the subject DEIR prepared by Fugro-McClelland, Inc. for PWA and dated September 1993.

The subject document does not deal with geologic and seismic issues because the Initial Study Checklist in Appendix 1.2 indicates a "less than significant" impact. I cannot support this finding as I have not seen or reviewed any structural drawings or geotechnical/foundation study that accomodates the anticipated ground displacement found in the Staal, Gardiner and Dunne fault study of 1992.

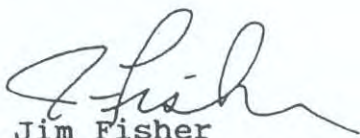
A

Note that the subject DEIR is inconsistent: A statement made on Page 4-2 indicates the project is subject to fault rupture, yet the Initial Study Checklist indicates a "Less than Significant" impact.

B

The first bullet under "Seismic Hazards" on Page 3-13 is vague in its reference to a previous study. A complete citation should be provided.

C


Jim Fisher
Engineering Geologist

END OF TEXT

10. Comments and Responses - Comments on the DEIR

Commentor: County of Ventura, Public Works Agency, Development and Inspection Services - Jim Fisher, Engineering Geologist (Letter 7)

Date: October 13, 1993

Response:

7.A The County will comply with all requirements included in the Alquist-Priolo Special Studies Zone Act. These requirements are specified in the 1992 Leighton and Associates geotechnical report and the 1992 Staal, Gardner and Dunne Fault Hazard Report for the Medical Examiner Facility. The Leighton report is referenced in Section 3.7, Project Design Features. In response to this comment, it will be added to Section 7.0, References, along with the Staal, Gardner and Dunne report.

In addition to any special recommendations, all new construction will comply with the Uniform Building Code earthquake specifications and the policies and criteria established by the State Mining and Geology Board. Therefore, potential impacts associated with fault rupture would be reduced to a less than significant level.

Based on review by the County Geologist of the location of the proposed parking structure and as an uninhabited facility, the design recommendations of a standard geotechnical report incorporated into the project description will reduce potential impacts associated with seismic hazards to a less than significant level.

7.B As indicated in the response above, because implementation of standard measures would reduce fault rupture risks to an acceptable level, the associated impact is considered to be less than significant.

7.C In response to this comment, the referenced text will be expanded to include a complete citation of both reports: the Leighton and Associates Geotechnical Report for Medical Examiner Facility (September 1992); and the Staal, Gardner and Dunne Geological (Fault Hazard) Report for the Medical Examiner Facility (January 1992).

DEIR Public Comment Perita... file copy

COUNTY OF VENTURA
PUBLIC WORKS AGENCY
Transportation Department

MEMORANDUM

October 13, 1993

8

RECEIVED

OCT 14 1993

ENGINEERING SERVICES

TO: Alec Pringle
PWA Engineering Services

FROM: Steven J. Manz, P.E., Senior Engineer *SM*

SUBJECT: VENTURA COUNTY MEDICAL CENTER (VCMC)
EXPANSION PROJECT

In response to your request for review of the Draft Environmental Impact Report (DEIR) for the subject project, Page 5.3-8 and 5.3-11 (Figure 5.3-2) correctly identifies that there are no significant environmental impacts to level of service on County roads or the Regional Road Network. A

In response to my memo dated August 18, 1993, the DEIR states at the bottom of Page 5.3-22 that:

'As a facility administered by a public agency, the Ventura County Medical Center would not currently be required to participate in the City's Traffic Mitigation Fee program. The VCMC may, however, be required to contribute to the program in the future. In addition, if any portion of the campus is leased to a private company in the future, that company would be expected to pay its "fair share" for the cost of these improvements based on its contribution to cumulative impacts to the local circulation system. No further mitigation is necessary.'

B

The DEIR should be reviewed by the City of Ventura to confirm the accuracy of this statement.

I can be reached at extension 2045 if you have any questions or if I can be of further assistance.

10. Comments and Responses to Comments on the DEIR

Commentor: County of Ventura, Public Works Agency, Transportation Department - Steven J. Manz, P.E., Senior Engineer (Letter 8)

Date: October 13, 1993

Response:

8.A The comment indicates that no significant impacts to levels of service on County roads or the Regional Road Network are expected from implementation of the project. No further response required.

8.B The DEIR was reviewed by the City of San Buenaventura, please see comment letter 10. No comments were provided regarding the referenced text.

CITY OF
SIMI VALLEY

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OCT 04 1993

ENGINEERING SERVICES



2929 Tapo Canyon Road, Simi Valley, California 93063 • (805) 583-6700

September 30, 1993

9

County of Ventura
Public Works Agency
Attn: Alec Pringle
800 South Victoria Avenue
Ventura, CA 93009

SUBJECT: VCMC EXPANSION PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT SPEC. NO.
CP 92-80

Dear Mr. Pringle:

Thank you for the opportunity to review the Draft EIR for the expansion of the Ventura County Medical Center. The City of Simi Valley Planning Staff has reviewed the document and has no comments on it.

If you have any questions regarding this matter, please feel free to contact Lauren Funaiole at (805) 583-6771.

Sincerely,

DIANE DAVIS-CROMPTON, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL SERVICES

A handwritten signature in black ink, appearing to read "Laura C. Kuhn".

Laura C. Kuhn
Deputy Director/Advanced Planning

cc: Associate Planner, L. Funaiole

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379

10. Comments and Responses to Comments on the DEIR

Commentor: City of Simi Valley, Department of Environmental Services - Laura C. Kuhn, Deputy Director/Advanced Planning (Letter 9)

Date: September 30, 1993

Response: The letter indicates that the City of Simi Valley has no comments on the EIR and, therefore, requires no further response.

CITY OF SAN BUENAVENTURA

October 8, 1993

Alec Pringle
Public Works Agency
Ventura County
800 S. Victoria Avenue L#1600
Ventura, CA 93009

RECEIVED

NOV 03 1993

10 ENGINEERING SERVICES

CITY COUNCIL

Gregory L. Carson, Mayor
Todd J. Collart, Deputy Mayor
Catherine F. Bean
Tom Buford
James L. Monahan
Jack Tingstrom
Gary R. Tuttle

RE: Draft EIR for VCMC Expansion
Comments from City of Ventura

Dear Mr. Pringle:

The City of San Buenaventura (Ventura) would like to forward the following comments on the Draft EIR for the VCMC expansion.

- The document's summary table for impacts and mitigation measures (Pages 2-3 through 2-8) indicates certain impacts are mitigable but some remain unavoidable. This has relevance with regard to the need to specify that the decision-making authority for the project will have to make Statements of Overriding Considerations for any impacts which are not mitigable. Both land use and aesthetics appear to fall within that category. The document should clearly explain this in the summary table as well as within the main text.
- The City has no formal permitting authority for the expansion because the site is owned and operated by the County. However, Government Code Section 65402 requires such County projects to be submitted and reviewed by the City's planning agency for conformity with the City's Comprehensive Plan. There are various City documents and requirements which are cited such as the Community Design Element (part of the Comprehensive Plan) and the height and use limitations of the "H" zoning of the site.

The document already notes that the three-story height limit of the "H" zone is not being met. However, required setbacks are not addressed. It appears that the various scenarios would place buildings or the proposed 10 foot high sound wall within the required 20 foot setback. The VCMC campus now reflects a considerable setback from Loma Vista Road property lines and the effects (streetscape, safe sight distance, utility clearance, etc.) of the proposed location of the new building(s)/wall should be evaluated in the document relative to that 20 foot required setback.
- The discussion about water conservation measures reflects most of the City's adopted water conservation measures. However, it does not specify that low flow toilets are to be used in the newly constructed facilities, which is a requirement of the City's Water Conservation Ordinance.

A

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C

000474

- The discussion about noise needs to indicate that the City has an adopted Noise Ordinance, including threshold limits. How does the project compare relative to the City's threshold limits? How do the mitigation measures compare? | D
- The mitigation measures for visual resources (Page 3-13) need to specify that the 75-150 foot landscape buffer is actually between the ACC or parking structure and the adjacent residences to the east. | E
- The Alternatives discussion does not clearly evaluate the viewshed from Foothill Road to the ocean as well as the viewshed from Loma Vista Road to the foothills in relation to the various scenarios for locations of the ACC and parking structure. An evaluation of line-of-sight impacts is needed, and mitigation measures or alternatives identified. What is your protocol for alerting impacted property owners, residents, and businesses? | F
- The parking evaluation is focused on a site survey rather than County Ordinance Code requirements for this type of facility. How does the County intend to reconcile differences between the two distinct parameters for site planning and development? | G
- We are aware that the residents of Agnes Drive have significant concerns with this proposal, particularly relative to noise, air pollution, height, aesthetics, glare, and simply the amplification of this type of use next to a residential area. We believe that any discussions of Alternatives should strongly focus on these aspects, particularly as they relate to the Agnes Drive residents. We would be more than willing to work with you and the community in a coordinative capacity to assure that these concerns are fully explored and resolved. | H
- The mitigation measures noted for impacts to water supplies and the mitigation measures noted on Page 5.3-22 relative to traffic are appropriate and in conformance with City policies and Ordinances. | I

The City appreciates the opportunity to review this draft document and looks forward to reviewing the final EIR. If you have any questions about these responses, please contact Karen Bates at 658-4720.

Sincerely,



Steve Chase
Chairperson, EIR Committee

cc: Supervisor Susan K. Lacey
Art Goulet, Director of Public Works
John Baker, City Manager

10. Comments and Responses to Comments on the DEIR

Commentor: City of San Buenaventura - Steve Chase, Chairperson, EIR Committee (Letter 10)

Date: October 8, 1993

Response:

10.A In response to this comment, EIR Section 2.0, Summary, has been amended to include a discussion of the need for Statements of Overriding Considerations by decision-makers for approval of a project with significant residual impacts.

10.B In response to this comment, EIR Section 5.1, Land Use, has been expanded to include a discussion of the City's 20 foot setback requirement within the "H" zone and an evaluation of the projects consistency/inconsistency with this requirement. However, as indicated in the text of the EIR, the project is not subject to the City's land use policies. The County decision-making body may choose to submit a modification request to the City for the proposed project's height and setback.

10.C As is now required by the state Uniform Building Code, the County will install low-flow toilets in new construction. This assumption has been incorporated into all water calculations for the project.

10.D The noise evaluation presented in the EIR evaluates noise impacts to sensitive land uses of concern in the project vicinity (residential) by comparing project-generated noise levels to the City's 65 dBA (CNEL) exterior noise level threshold and 45 dBA (CNEL) interior noise threshold. This is an appropriate method for estimating future project noise and evaluating potential impacts. The project would be subject to the City's noise ordinance as a policing mechanism. As stated in the City's Noise Element Technical Appendix "the City has adopted a Noise Control Ordinance to resolve complaints which involve existing intrusive noise problems."

It should be noted that ambient noise levels along Loma Vista Road east of Hillmont Avenue *already* exceed the 65 dBA standard by 3.4 dBA. The project's contribution would not exceed 0.1 dBA, an inaudible increase.

10.E The referenced text has been modified to clarify that the buffer would be between the ACC and parking structure, and residences to the east.

10.F The Foothill Road viewsheds were examined as part of the Initial Study. The analysis showed that after implementation of the proposed Coroner/Medical

Examiner Facility, effects on viewsheds would be less than significant. This issue was, therefore, not carried forward into the EIR analysis, and was consequently not included as part of the alternatives evaluation. Nevertheless, the issue of Aesthetics is given substantial treatment in the EIR both as a primary issue and within the Alternatives analysis.

Because none of the alternatives analyzed involved siting changes to the Coroner/Medical Examiner Facility, no change would be anticipated to Foothill Road corridor viewsheds.

Due to the lower elevation of Loma Vista Road, the project site is at some points the exclusive component of the viewshed north of this road. Existing and proposed project structures constitute the primary component of the streetscape along the property boundary at Loma Vista Road, whereas, on Foothill open space and increased setbacks reduce the importance of project structures as components of the streetscape.

The County has notified the public through notices published in a newspaper of general circulation in the area affected by the proposed project.

10.G

The County has accepted the site-specific evaluation of parking requirements for this project which examines the requirements as necessitated by the proposed expansion. The City, incidently, has recommended this methodology in past discussions regarding this proposed project.

This project-specific evaluation takes into consideration parameters unique to the project and, therefore, provides a more realistic evaluation of parking requirements than application of standard ordinance requirements.

10.H

Two neighborhood workshops and a public scoping meeting were held prior to the commencement of EIR preparation to obtain information from concerned agencies and the public with regard to development of the project, alternatives and environmental issues to be evaluated in the EIR. The City of Ventura was among the public agencies notified of the scoping meeting, but did not attend.

The alternatives evaluated in the EIR reflect the substantial community input received during the meetings, and meet the requirements of the *State CEQA Guidelines* Section 15126 (d) for evaluation of a reasonable range of alternatives to the project.

It should also be noted that, aside from the no project alternative, two of the alternatives evaluated were determined to be superior to the proposed project.

10. Comments and Responses to Comments on the DEIR

10.I

The comment agrees with the mitigation requirements set forth in the EIR with regard to water supplies and traffic and requires no further response here.

DEIR Public Review Period
File

8



||

COMMUNITY DEVELOPMENT DEPARTMENT • 305 W. THIRD ST. • OXNARD, CA 93030 • (805) 385-7857
FAX • (805) 385-7417

RICHARD J. MAGGIO, DIRECTOR

October 15, 1993

RECEIVED
OCT 20 1993
ENGINEERING SERVICES

Mr. Alec Pringle
Project Manager
Engineering Services
County of Ventura
Public Works Agency
800 South Victoria Avenue
Ventura, CA 93009

Dear Mr. Pringle:

Subject: VCMC Expansion Project
Draft Environmental Impact Report (DEIR)
Spec. No. CP 92-80

Enclosed please find the comments received for the Ventura County Medical Center Expansion Project DEIR. Thank you for giving us the opportunity to review and comment on the subject EIR.

Sincerely,

Richard J. Maggio
Community Development Director

RJM/el
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10. Comments and Responses to Comments on the DEIR

Commentor: City of Oxnard, Community Development Department - Richard Maggio
Community Development Director (Letter 11)

Date: October 15, 1993

Response: The letter introduces comments submitted from City of Oxnard staff and requires no further response.




12

October 15, 1993

TO: Richard J. Maggio, Community Development Director
VIA: Timothy P. Nanson, Development Services Director
FROM: Samia Maximous, Traffic and Transportation Manager
SUBJECT: VCMC Expansion Project (DEIR)

Traffic staff reviewed the draft EIR and present the following comments:

1. The trip generation rate for the VCMC expansion seems to be based upon a combination of the current number of employees and the expanded square footage. This combined rate is lower than the ITE Trip Generation (Fifth Edition), for a hospital land use, either by using the employee rate or the square footage rate. The use of square footage rate is more appropriate for this project.


Samia Maximous
Traffic and Transportation Manager

SM:1a

000481

370

10. Comments and Responses to Comments on the DEIR

Commentor: City of Oxnard - Samia Maximous, Traffic and Transportation Manager (Letter 12)

Date: October 15, 1993

Response: The trip generation rates for the VCMC expansion, which were developed by the City of Ventura, are based on the existing Medical Center square-footage (398,157 SF) and the current number of employees (1,016) arriving/departing the hospital during normal working hours. For each employee, an average rate of four trips per day is assigned. This was based on the type of work performed by employees including client and/or patient trips. To develop the average trip rate per 1,000 SF for the existing Medical Center, the following calculation was performed:

$$\begin{aligned} 1,016 \text{ employee} * 4 \text{ trips/employee} &= 4,064 \text{ trips} \\ 4,064 \text{ ADT} / 398,157 \text{ SF} &= 10.2 \text{ ADT per } 1,000 \text{ SF} \end{aligned}$$

PM Peak hour rate = 10% of ADT rate = 1.02 trips/1,000 SF (0.39 inbound, 0.63).

Application of PM peak hour rates developed specifically for the VCMC to the proposed expansion project (62,115) results in an additional 64 trips (24 inbound, 60 outbound) during the PM peak hour.

Comparison of these figures with the traffic forecast for the VCMC expansion, using the average trip rates in ITE Trip Generation (Fifth Edition), show that the evening peak hour forecasts are essentially the same. Based on the 5th Edition rates, the VCMC expansion project is forecasted to generate 65 additional trips, (20 inbound, 45 outbound).

Based on the above information, we conclude that the results of the VCMC Traffic Impact Analysis Report are validated.

VENTURA COUNTY
ALLIANCE OF TAXPAYERS

"The Taxpayers' Advocate"

4435 McGrath Street #304
Ventura, CA 93003

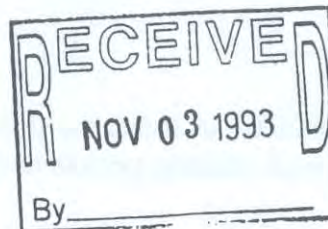
H. Jere Robings
President

(805) 654-0322

13

Paul B. Blatz
Legal Counsel

November 3, 1993



Environmental Review Committee
County of Ventura
800 South Victoria Avenue
Ventura CA 93009

SUBJECT: VENTURA COUNTY MEDICAL CENTER

Several months ago when the Board of Supervisors was asked to approve funding for architectural drawings for the new facilities at the County Medical Center, I raised questions regarding the lack of a financial feasibility study justifying the expenditure of \$40 million. Specifically, I asked if an analysis had been prepared to determine if the services to be provided in the new facility could be provided by private, existing hospitals with County subsidy. Following my comments to the Board, Mr. Phillip Wessels stated that a feasibility study had not been prepared "because we know this will be the most cost effective proposal."

A

I am surprised to find that this alternative has not been addressed in the Draft EIR. It appears the DEIR is insufficient without this information.

B

Considering the fact the County Medical Center is charged with being the provider of last resort to the indigent, there should be an analysis as to the future of medical care by the County when and if a federal health care system is in place. If the federal plan covers all residents with health insurance, there may be no need for a County hospital.

C

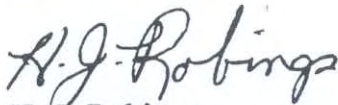
At a time when the State and the County are suffering financial hardship and cutting services, it seems to be very inappropriate timing to ask taxpayers to spend \$40 million.



We ask the Committee to determine this Draft EIR insufficient and lacking an analysis of the alternative of utilizing private hospitals. There must be a financial feasibility analysis.

| D

Very truly yours,



H. J. Robings
President

10. Comments and Responses Comments on the DEIR

Commentor: Ventura County Alliance of Taxpayers - H.J. Robings, President (Letter 13)

Date: November 13, 1993

Response:

13.A The economic effect of a project shall not be treated as a significant effect on the environment. The analysis of the proposed project in the environmental document will focus on the physical changes which the project may bring. In that respect, the inclusion of a Financial Feasibility Study is not required as part of the CEQA process. Economic analysis of the project may be provided apart from the EIR process.

13.B The EIR contains a range of reasonable alternatives to the project and to its location (four onsite alternative configurations, a no project alternative, and three offsite alternative locations) as required by CEQA. The commentor's proposed alternative (services through existing private hospitals with County subsidies) was not considered as a separate alternative because it did not meet the basic project needs and objectives noted in Section 2.1 including providing services through County resources. Moreover, the no project alternative includes some elements of the commentors proposal.

13.C The final resolution of proposed health care reform legislation is not reasonable to project, and the possibility of any impact too speculative for evaluation. These questions are beyond the scope of this EIR and may be addressed by the decision-making body in reaching a decision on the project.

13.D Please see the Response to Comments Nos. 13A and 13B above.

EIR Public Review Period
File copy

MYERS, WIDDERS & GIBSON
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PLEASE REPLY TO
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VENTURA, CALIFORNIA 93006
TELECOPIER: (805) 644-7390
KATHERINE E. STONE, P.C.
OF COUNSEL

October 15, 1993

RECEIVED

OCT 18 1993

ENGINEERING SERVICES

14

Alec T. Pringle,
Project Manager
Public Works Agency
800 South Victoria Avenue
Ventura, California 93009

Re: VCMC EIR Public Comment

Dear Mr. Pringle:

Before going into the merits of the Draft Environmental Impact Report I would like to make clear my belief that the entire approval process for this project has been a sham.

It is obvious from the lack of a good-faith effort on the part of the drafters of the original negative declaration and this EIR to consider alternatives that they have never intended to deviate from their original plans to construct the Ambulatory Clinic and parking structure along Agnus Drive. It was apparent to me at the public meetings that the location of the buildings was based primarily on staff concerns regarding their own convenience with a complete disregard for the interests of the neighborhood. I honestly believe that should this EIR be challenged in court it will be determined to be patently deficient in its consideration of alternatives. My personal beliefs aside lets go to the merits of your EIR.

Your EIR assumes that there is a need for each of the proposed structures and provides a simplistic discussion of this need at pages 3-10 through 3-12. Since I believe the Ambulatory Clinic and the parking structure are the most obvious waste of taxpayer dollars I will focus on the lack of any need for these structures. Section 3.6.2 of the EIR claims that the goal of the ACC is to "optimize the use of staff, operation and maintenance funds, and maximize the synergistic effects of specialized clinics and medical staff in close proximity." This is a long-winded way of saying that it will make things easier for the VCMC staff. There is some discussion of utilities cost savings but no budget comparisons are provided evidencing this savings. The majority of paragraph 3.6.2, however, appears to be dedicated to staff convenience.

It is amazing to me that the county is proposing to spend millions of dollars to construct an ambulatory facility when other community hospitals are on the verge of bankruptcy or have more

than ample beds and facilities to provide the very services sought to be provided by the proposed ACC. Nowhere in the county's discussion of need does it indicate that there is a shortage of bed space or facilities in Ventura County.

C
(cont.)

Does the county honestly believe that it will cost more to contract out services to under utilized private community hospitals than to build, maintain and staff a multi-million dollar Ambulatory Clinic?

If the private hospitals in the community cannot keep their beds full and their facilities utilized, how does the county expect to do the job? Where do they expect this new demand for services to come from? These are tough questions which must be answered before the county spends millions of dollars to construct new facilities.

The reason for being of the proposed parking structure depends in part on the need for the ACC. As set forth above, there are some serious unresolved issues in that regard.

There is no question that the proposed ACC and parking structure will adversely affect the residents of Agnus Drive. You cannot possibly construct 3 to 5 story structures along the entire length of a beautiful residential street without changing the nature of the neighborhood. The word used by you is "urbanization". I believe industrialization or commercialization is more appropriate.

D

The existing medical center at the corner of Loma Vista and Agnus Drive is an eyesore day and night. During the day it towers over the small single family residences below it casting a shadow over the backyards of those homes. During the night the glare from its lights reminds one of the oil platforms off our coast. It has no redeeming qualities.

E

You are now proposing to extend these same type of structures the entire length of Agnus Drive. There is nothing you can do to mitigate the effects of such structures other than moving the proposed structures to alternative sites on the VCMC campus. As more fully set below I believe alternative (3) which would locate the proposed ACC on Loma Vista is feasible and would have the least impact on surrounding residential neighborhoods.

Your discussion of the viability of alternatives is patently inadequate. Alternative 3 is disregarded because of alleged increases in design and construction cost. However, no comparable figures are provided. Furthermore, there should be little additional cost for such a straightforward design scheme. The plans prepared to date are "not location specific." If they are location specific then the county has prepared those designs in

F

Alec T. Pringle

October 15, 1993

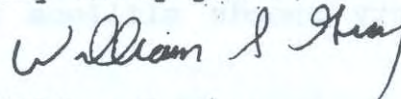
direct contravention of CEQA. The sole remaining basis for rejecting this alternative appear once again to be VCMC staff convenience. It appears that the county is willing to destroy the beauty of a known scenic street in the name of staff convenience alone.

F
(Cont.)

In conclusion I believe the county has failed to justify the construction of a multi-million dollar Ambulatory Clinic and parking structure. It will be a loser for the residents of Ventura County. The structures as proposed would unnecessarily destroy a beautiful neighborhood.

G

Very truly yours,



William S. Gray

10. Comments and Responses Comments on the DEIR

Commentor: Myers, Widders and Gibson Attorneys at Law - William S. Gray (Letter 14)

Date: October 15, 1993

Response:

14.A The commentor expresses the opinion that the proposed project and alternatives scoping process were handled with a disregard for public concerns. Please see the response to comment 10.H.

14.B The primary outpatient medical clinics and related support services are located in numerous buildings ranging in age from 40 to 70 years old. These buildings have been modified and converted piecemeal over the years to accommodate changing uses, and are inefficient for their current uses in terms of layout, maintenance, energy consumption, and inter-operability with each of the other clinics. The need for improved medical facilities is intended to provide efficiencies for staff and the public served. The effective and efficient delivery of health care services to the citizens of Ventura County are at the core of the objectives of the project proponents.

14.C The Ambulatory Care Clinic is an outpatient facility. It is designed to meet more specialized medical care needs than can be met at primary care clinics. These specialized clinics are not a duplication of services available in the County nor a solution to a new demand but, instead, a replacement for the existing and less than optimum facilities currently used by the County.

As the Ambulatory Care Clinic is an outpatient facility, there are no beds and, therefore, no increase to the bed capacity of the VCMC. Staffing for the proposed new ACC is the same as currently utilized in the various clinics of the VCMC, so there is no increase in staffing for the project. In a modern energy-efficient and well-constructed facility such as the proposed ACC, the cost to maintain and operate the facility per square foot will be less than the current facilities' cost to operate and maintain. This would be further enhanced by the design of the proposed facility which will make optimum use of the available space for the most efficient delivery of health care sources.

14.D As indicated in the comment, the EIR does acknowledge the change in land use and aesthetic character of the project site to a more urban nature (please see Section 5.1, Land Use, and Section 5.2, Aesthetics/Shadow/Light and Glare). The commentor expresses the opinion that the change would be more appropriately described as industrialization or commercialization rather than intensification.

10. Comments and Responses to Comments on the DEIR

14.E Aesthetic impacts are evaluated in Section 5.2 of the EIR. Alternative Site Plan 3, evaluated in Section 7.1.3 of the EIR, proposes the ACC be located on Loma Vista Road.

14.F The discussion of viability for Alternative Site Plan 3, presented in Section 7.4.4 of the EIR, discusses several issues in addition to increased design and construction costs as referenced in this comment. Additional issues affecting the viability of this alternative include:

- 1) duplication of medical laboratory and blood bank services;
- 2) location of kitchen and dietary functions away from the hospital increasing inefficiency and costs; and
- 3) the ACC location would diminish the delivery of health care services and access of patients and staff between the ACC and hospital.

This discussion does not preclude development of Alternative Site Plan 3, but simply states issues of consideration for decision-makers.

14.G Comment relates to the opinion of the commentor regarding the project and does not relate to the environmental analysis contained in the EIR. No further response is required.

15

MARK PACHOWICZ
301 AGNUS DRIVE
VENTURA, CA 93003

Environmental Review Committee
County of Ventura
800 South Victoria Avenue
Ventura, CA 93009

Subject: Draft - Environmental Impact Report for the Ventura
County Medical Center Expansion

To Whom It May Concern:

A brief review of the Draft Environmental Impact Report (hereinafter "DEIR") prepared for the VCMC expansion project reveals numerous deficiencies. In an effort to ensure that I exhaust all of my administrative remedies, I submit the following objections and concerns for your consideration.

1. A CONTINUANCE MUST BE GRANTED.

The time for public comment must be extended and the public hearing must be continued. The lead agency has failed to comply with Public Resources Code (P.R.C) Section 21092.

P.R.C. § 21092 requires the lead agency to notify all concerned parties when the DEIR is completed. I received my notice of completion on October 27, 1993. (Exhibit A) I have

A

written to the lead agency on several occasions requesting notification of various events involving this project. The lead agency has informed me that I was inadvertently left off of their mailing list. Unfortunately, this inadvertence has prejudiced me and denied me the opportunity to present a more detailed review of the DEIR beyond what is contained in this letter.

1.
(Cont.)

I request an extension of the time for public comment and a continuance of the public hearing currently set for November 3, 1993. To comply with CEQA the time for public comment should be extended until December 13, 1993.

Reserving all of my rights to proper notice as required by law and without waiving any issue regarding notice I submit the following:

2. THE LEAD AGENCY HAS FAILED TO INDEPENDENTLY REVIEW THIS DOCUMENT.

P.R.C. § 21082.1 requires the lead agency to "independently review and analyze" the DEIR before releasing it to the public. This has not been done. Section 8.2 of the DEIR does not even list Alec Pringle, the projects manager, as a person who was contacted in the preparation of this report. The DEIR contains no

B

indication that it reflects the "independent judgment" of the lead agency. Until both of these statutory requirements are met, this DEIR cannot be presented to the public for consideration. I object to the documents presentation until § 21082.1 has been complied with.

B
(Cont.)

3. THE DEIR IS NOT A "GOOD FAITH EFFORT AT FULL DISCLOSURE."

Section 1.2 of the DEIR is inaccurate and misleading. Section 1.2 states that a NOP was distributed on May 27, 1993. Despite my written request to Mr. Pringle dated May 28, 1993, I did not receive notification as required in P.R.C. § 21092.2 (Exhibit B).

C

The DEIR makes it appear as if the original Initial Study prepared by the County of Ventura demonstrated that the proposed project could result in a significant environmental impact in five areas. (1-1) This is not the case. The drafters of this DEIR have kindly attached an Initial Study for your review and consideration. The document they have chosen to attach is dated May, 1993.

This is not the document that was circulated to the public for consideration and comment. After all, the time for public

(Cont.)

comment on the original Initial Study and Draft Negative Declaration was from April 12, 1993 to May 12, 1993 with a public hearing set for April 27, 1993 (Exhibit C).

The original Initial Study differed from the document that has been attached for your consideration in two significant ways.

1. It concluded that none of the items on the Initial Study Check List would have a significant impact on the environment, and
2. It concluded that "the proposed project could not have a significant effect on the environment, and a Negative Declaration should be prepared."

D

These conclusions are in stark contrast to the statements contained in the documents presented to you for your consideration. Accordingly, the DEIR is not a "good faith effort at full disclosure," as required by § 15151 of the State CEQA Guidelines.

4. FUGRO-McCLELLAND IS BIASED.

The lead agency originally concluded this project could have no impact on the environment. The lead agency retained Fugro-

E

McClelland to reach the same conclusion in a "Draft Negative Declaration." Fugro-McClelland complied and the document was presented to the public. What was formerly called a Draft Negative Declaration is now called an "Initial Study" and submitted for your review. I have attached a copy of the original Initial Study and the Draft Negative Declaration. (Exhibit D) A random comparison would appear to indicate that the documents are identical except for the conclusions they reach.

E
(cont.)

I lodged with the Board of Supervisors and the Public Works Agency (P.W.A.) a letter dated April 18, 1993. (Exhibit E) In this letter I set forth my objections to the illegal activities of the Board and the P.W.A. I incorporate the objections outlined in that letter into this document.

I lodged another letter with the Board of Supervisors on April 27, 1993. (Exhibit F) Exhibit F is also incorporated into this document. At a public meeting on April 27, 1993, I objected to the retention of Fugro-McClelland as consultants to prepare the EIR given their previous conclusions. Obviously, my objection was ignored.

I request that a new environmental impact report be prepared

by an unbiased consulting firm who has not previously rejected out of hand the impact on the environment this project will have.

F
(cont.)

5. THE LEAD AGENCY HAS YET TO DEFINE THE SCOPE OF THIS PROJECT.

The DEIR is inconsistent with other documents released by the lead agency. The scope of the project has yet to be accurately described, therefore the DEIR is fatally flawed.

Section 1.2 of the DEIR states "since the preparation of the initial study and circulation of the NOP, some minor revisions to the proposed project have been made. These include a 13,755 sq. ft. reduction in the size of the proposed ambulatory care clinic." (1-1)

F

In a letter to the Board of Supervisors dated October 19, 1993, the Public Works Agency states, "secondly, the building size has increased 5% over the original program to about 105,000 sq. ft." (Exhibit G) Thus, the question must be posed; Is the building growing or shrinking? The important answer is, that the lead agency has failed to define the scope of this project. This creates a legal inadequacy. "An accurate, stable and finite project description is *the sine qua non* of an informative and legally sufficient EIR." (County of Inyo v. City of Los Angeles, (1977) 71 Cal.App.3rd

185) The primary harm caused by the "incessant shifts among different project descriptions was that the inconsistency confused the public and commenting agencies thus vitiating the usefulness of the process as a vehicle for intelligent public participation.

F

(cont.)

(County of Inyo)

The project description is inadequate and inconsistent with other information distributed by the lead agency. The DEIR is useless to a decision making body such as yours or to the public.

6. THE DEIR IS NOTHING MORE THAN A SERIES OF CONCLUSIONS.

Sections 3.4, 3.5, 3.6.1, 3.6.2, 3.6.3 and 3.6.4 are all inadequate and fail to serve the purpose of the environmental impact review process. These sections are conclusory and lack any "substantial information," thus destroying the possibility of "quantitative, comparative analysis" as required by law. (Kings County Farm Bureau v. City of Hayford, (1970) 221 Cal App 3rd 692, 730-732.

G

Section 3.7 of the DEIR is legally deficient and provides a " cursory at best" view of issues such as air quality, visual resources and seismic hazards. This lack of specificity makes an

intelligent comparison of the alternatives impossible. "Without a meaningful analysis of alternatives in the EIR, neither the courts nor the public can fulfill their proper role in the CEQA process."

(Laurel Heights Improvements Association v. Regents of the University of California, (1988) 47 Cal.3rd 376, 404.

Section 5.1.1.2 notes that the proposed project will violate a City of San Buenaventura height Ordinance. Yet, only one of the alternatives attempts to comply with this City law. The County Health Care Agency rejects this alternative in one conclusory paragraph without any litigitmate attempt to address the issues raised in the DEIR.

Section 5.1.2.2, concedes, as it must, that the ambulatory care clinic (ACC) and parking structure would be incompatible with the homes on Agnus Drive. However, the report concludes there will be no compatibility problems for uses along Loma Vista Road. This conclusion is obvious, since the tall buildings will be hidden in the backyards of the homes on Agnus Drive.

According to the drafters of the DEIR a perceived problem with Alternative 3, (which places the ACC on Loma Vista) is that it would "cause a greater loss of background views of the Ventura

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(Cont.)

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foothills from the Loma Vista Road corridor..." (7-11) An examination of the area involved reveals that those who would lose the foothill view are the businesses across the street from the hospital, i.e., the funeral home, and the people driving down the corridor at 30 m.p.h..

I
(Cont.)

In section 5.1.3 the incomprehensible logic of the drafters of this document continues. The DEIR states, "Outside of reducing the height of the proposed ACC, an option analyzed in Section 7.0, Alternatives, no measures are available to mitigate impacts related to scale incompatibilities with adjacent residents along Agnus Drive or potential inconsistencies with the established City of Ventura Zoning Regulations." (5.1-7)

J

Clearly, the adoption of any one of the alternative projects would eliminate at least one huge building from the backyards of the people who reside on Agnus Drive. Lowering the structures while increasing the area that they cover as well as spreading the amount of ground level parking over the 40 acres that makes up the VCMC campus is another alternative.

K

7. THE ALTERNATIVE PROJECT SECTION OF THE DEIR IS INADEQUATE.

L

The DEIR considers 4 alternatives. The report concludes that two of the alternatives are environmentally superior to the proposed plan. "The key issue is whether the selection and discussion of alternatives fosters informed decision making and informed public participation." (§ 15126 CEQA Guidelines)

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(cont.)

The law does not require that the lead agency create alternatives where none exist. The law does require that the DEIR consider feasible alternatives. I along with my neighbors proposed an alternative that was not considered. The proposal is contained in Exhibit F. A copy of this letter was provided to the EIR consultant. The failure of the lead agency and the drafters of the DEIR to include it as an alternative a violation of the spirit of CEQA.

M

The DEIR is totally lacking in its production of information to be used in a "quantitative, comparative analysis." The DEIR fails miserably in its attempt, if one was made, to comply with the rulings in Kings County Farm Bureau v. City of Hawford, (1970) 221 Cal App 3rd 692, 730-732 and Laurel Heights Improvements Association v. Regents of the University of California, (1988) 47 Cal.3rd 376, 404 which mandate the production of such

N

information.

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(cont.)

The best alternative is a combination of alternatives number 2 and 3. The ACC should be placed on the corner of Loma Vista and Hillmont as it is depicted in alternative number 3 on page 7-12 of the DEIR.

This location would not effect the people who live on Agnus Drive. Shadows, light and noise pollution would be removed as significant environmental impacts. It would not be structurally incompatible with the area since it would stand shoulder to shoulder with the existing hospital and would not tower over the homes on Agnus. The big losers, environmentally speaking, are the people who drive down the Loma Vista corridor who would lose their view of the Ventura foothills for the 5 seconds it would take to travel the width of the ACC at 30 m.p.h..

O

The perceived parking problem at the facility could be solved by placing a 2 1/2 level structure in the location depicted in alternative number 2 at page 7-8 of the DEIR. This would reduce the light, noise, and air quality concerns of the people who reside on Agnus Drive. It would not be "incompatible" in size. VCMC would not lose the precious office space they claim to so

P

desperately need in section 7.4.2 of the DEIR. The noise which the County claims will effect the mental health patients can be blocked in the same manner they propose to block the noise from Loma Vista, i.e., by building a block wall.

F)
(cont.)

There are many ways to make this project environmentally sound. It appears that the County has decided to reject each of them and proceed on their chosen course, the shortest distance to the potentially available State funds under SB - 1732.

In their haste to get to the all mighty dollar, the County of Ventura has ignored the rights of the citizens of Ventura who demand compliance with CEQA. The law requires that "if the agency finds certain alternatives to be infeasible, its analysis must explain in meaningful detail the reasons and facts supporting that conclusion." Marin Water District v. KG Land Corporation California, (1991) 235 Cal.App.3d 1652.

Q

The vague and unsupported conclusions contained in section 7.4 of the DEIR are so far from acceptable under the standard set forth above they alone are reason to reject this entire document as inadequate. I strongly object to the statement that centralized parking is necessary. (7-29) No reasonable person

R

can conclude that people who work in the new Medical Examiner facility and the Administration building will park in the same lot as people who work in the new ACC building, new Mental Health facility and the existing hospital. The evidence refutes the alleged need for more parking. The parking study conducted by Linscott, Law and Greenspan found, "Briefly, we conclude that parking at the existing Ventura County Medical Center is essentially in balance." (Exhibit F)

R
(Cont.)

8. CONCLUSION.

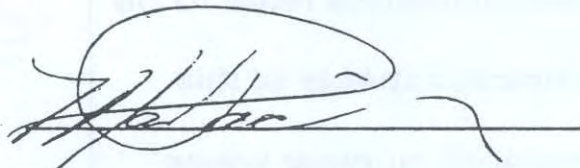
Given the continuance that I have requested and strongly believe the law allows, I will discuss in a supplemental letter to be provided, the problems with the more technical aspects of this DEIR, such as traffic, air quality seismic hazards, nuclear waste and other toxic materials handled by this facility.

S

The Board of Supervisors have spent over a million dollars on this project. The Public Works Agency has failed every step of the way to comply with the letter and spirit of the law. The need for this proposed facility cannot be justified given the current fiscal problems being experienced by the County. The uncertainty shared by everyone involved with health care at this time makes

this project totally unjustifiable.

The State of California has dropped a carrot in front of this County, SB - 1732. Currently, there is so much "bureaucratic and financial momentum behind this project" that the County is failing to comply with the law of this State. This committee must recognize this DEIR for what it is, a blatantly inadequate attempt to justify the actions of the Public Works Agency and the Health Care Agency. If you decide to consider this document over my objection, I request that you reject it for the reasons I have cited.



Mark Pachowicz

Commentor: Mark Pachowicz (Letter 15)

Response:

15.A The lead agency has fully complied with PRC Section 2109, including providing public notice within a reasonable period of time of the preparation of the environmental impact report and publication by the public agency in a newspaper of general circulation in the area affected by the proposed project. As a courtesy beyond notification requirements of CEQA, the lead agency sent a letter of information to citizens who had attended the public meetings. By administrative error, the commentor did not receive a letter until later. There is evidence the commentor did have knowledge of the public notice from neighbors and had visited lead agency offices prior to receiving the informational letter. In addition, the commentor did not previously request this notice as required by PRC Section 21092 nor did he comply with PRC Section 21092.2 and request in writing that any notices required by applicable PRC sections be mailed to him. The request for continuance, therefore, has no basis in the Public Resources Code, nor in fact.

15.B Alec Pringle is the County Public Works Agency's project manager for the preparation of the EIR. He and other County staff independently reviewed the Draft EIR prior to its circulation for public review. Thus, the requirements of Public Resources Code Sections 21082.1 and 21082.2 have been complied with.

The list of contacts in DEIR Section 8.2 includes those individuals and agencies contacted for information relevant to the EIR's analysis of environmental issue areas. As the Public Works Agency's project manager, Mr. Pringle has been, and continues to be, one of the preparers of the EIR, rather than a person contacted.

15.C In response to the commentor's May 28, 1993 request for notification of the EIR preparation, a copy of the Notice of Preparation and Initial Study were made available to the commentor as noted in the Agency letter of 7 July, 1993.

It is true that the original Initial Study and Negative Declaration were circulated for public review from April 12, 1993 until May 12, 1993. That document originally determined that impacts in all environmental issue areas could be reduced to a less than significant level through the incorporation of various features into the project design.

However, because of the substantial public controversy that was raised over the original Initial Study/Negative Declaration, it was determined that an EIR

10. Comments and Responses to Comments on the DEIR

should be prepared to further address the concerns of residents in the vicinity of the VCMC campus. Thus, the Initial Study was revised to reflect the proposed project's potentially significant impacts for the five issue areas around which the controversy had centered (land use, aesthetics, traffic, air quality, and noise). It was then recirculated as part of the Notice of Preparation for the EIR on May 27, 1993, in accordance with Section 15082 of the *Guidelines for Implementation of the California Environmental Quality Act*.

15.D Although the original Initial Study found that no significant impact on the environment would occur, it was determined that several issues warranted reconsideration in the form of an EIR due to the substantial public controversy that arose in response to that document. Thus, the Draft EIR has been prepared with the express purpose of providing a good faith effort at full disclosure of the proposed project's environmental effects, thereby fulfilling the requirements of Section 15151 of the *Guidelines for Implementation of the California Environmental Quality Act*.

15.E Fugro-McClelland is a Ventura County-based consulting firm that has prepared hundreds of environmental impact reports for numerous jurisdictions throughout California over the past 12 years. The firm has established a strong reputation for its impartial analysis of a range of projects and its documents have been recognized in the form of awards from both the American Planning Association and the Association of Environmental Professionals.

Fugro-McClelland's impartiality is further evidenced by the fact that the EIR identifies significant unavoidable project impacts in two issue areas (land use and aesthetics), and three alternatives that are environmentally superior to the proposed project.

15.F Following the preparation and circulation of the May 1993 NOP/Initial Study, the County made some minor revisions to the proposed project. These included a 13,755 square-foot reduction in the size of the ambulatory care clinic and a reduction in the number of additional parking spaces to be provided in the proposed parking structure. Because neither of these project revisions would entail any additional environmental impacts beyond those associated with the project described in the NOP, it was determined that recirculation of the NOP was not necessary. No further changes to the project have occurred since that time.

15.G

Sections 3.4, 3.5, 3.6.1, 3.6.2, 3.6.3, and 3.6.4 are all part of the Project Description and are not intended to be conclusory. Rather, they are intended to provide a description of the project as proposed.

According to Section 15124 of the *Guidelines for Implementation of the California Environmental Quality Act*, a project description should provide the precise location of the project, a statement of project objectives, a general description of the project's characteristics, and a statement of the intended uses of the EIR. The EIR Project Description includes all of this information and provides sufficient detail for the evaluation and review of the proposed project's environmental impact. Therefore, it fulfills the requirements for EIR project descriptions.

The listing in Section 3.7 is not meant to provide an in-depth discussion of all of the environmental issues listed. Rather, it lists a number of features that will be incorporated into the design of the proposed project in order to minimize the project's environmental impacts.

15.H

The EIR analyzes four onsite alternatives to the proposed project. They were developed in response to suggestions and concerns raised by community residents, in response to City land regulatory documents, and to meet the primary objectives of the project proponents. Concerns were solicited through public meetings held on the proposed project as part of the Notice of Preparation process.

One of the alternatives, Alternative 4, would comply with the City's height restrictions for the "H" zone, thereby allowing consideration of an alternative that would comply with City height standards.

15.I

It is true that those who would primarily be affected by the loss of foothill views under Alternative 3 would be businesses across Loma Vista Road and motorists driving along Loma Vista Road. Such viewers are not typically as sensitive to views as are residences (such as those on Agnus Drive where viewsheds would be more greatly affected under the proposed project). Nevertheless, the viewshed loss that would occur along Loma Vista Road under Alternative 3 would affect more viewers overall than would the proposed project.

15.J

Moving the ACC to another location onsite or reducing its height could reduce the visual impacts to Agnus Drive residences. However, either of these options would constitute a change to the project, rather than a mitigation measure. Consequently, both of these options are considered as project alternatives in the EIR Section 7.0. Alternative 3 would reverse the positions

10. Comments and Responses to Comments on the DEIR

of the ACC and Mental Health In-Patient Unit and Alternative 4 would move the ACC to the location of the existing old wing of the Hospital and reduce its height to three stories. As discussed in Subsection 7.3, Environmentally Superior Alternative, either of these alternatives would be superior to the proposed project from the perspective of land use and aesthetics.

15.K Section 7.0 of the EIR considers several alternatives which would move structures or reduce their height, as suggested by the commentor. In accordance with Section 15126(d) of the *Guidelines for Implementation of the California Environmental Quality Act*, the alternative site plans examined in the EIR were selected because they could reduce or eliminate one or more of the significant impacts identified for the proposed project.

15.L As discussed in Response 15.H, the four alternative scenarios analyzed in the EIR were developed to accommodate suggestions and concerns expressed by community residents, to alleviate environmental effects, and to meet the primary objectives of the project proponents. By examining alternative scenarios suggested by members of the public, the EIR fulfills the CEQA mandate of fostering informed decision-making and public participation.

15.M Although not all of the alternatives suggested by the public could feasibly be considered in the EIR, the EIR does look at four scenarios that incorporate concerns and suggestions voiced by members of the public at the public meetings on the proposed project.

The alternative described in the commentor's exhibit F is covered in large part by Alternative 3, analyzed in the EIR. The sole difference is that the commentor's suggested alternative would site the parking structure west of Hillmont Avenue adjacent to residential land uses along Estrella Street, rather than leaving it where it is proposed, as was done in Alternative 3. The siting of the structure where suggested by the commentor would not benefit from a 150-foot buffer from residential uses, as does the siting in Alternative 3. Furthermore, it would be sited across Hillmont Avenue from the majority of the uses it would need to serve: the ACC, the Hospital, and the Mental Health In-Patient facility.

Thus, the EIR alternatives analysis fulfills the spirit of CEQA by (1) analyzing options that could reduce environmental effects, (2) incorporating concerns of affected communities, and (3) fostering informed decision-making and public participation.

15.N In accordance with Section 15126(d) of the *Guidelines for Implementation of the California Environmental Quality Act*, the intent of the EIR alternatives

10. Comments and Responses to Comments on the DEIR

analysis is to describe a range of reasonable alternatives that could attain the basic objectives of the project. The four alternatives examined were intended to alleviate one or more of the significant effects identified for the project.

When possible, a quantitative comparison of effects is included in the alternatives analysis. However, the proposed project's primary effects would be in the areas of land use and aesthetics. Because these two issues are generally subjective and qualitative in nature, quantification of impacts in these areas typically is not possible.

15.O The commentor's opinion that the ACC should be placed at the corner of Loma Vista Road and Hillmont Avenue is noted. This suggestion will be considered by County decision-makers as they contemplate the project and EIR.

15.P The commentor's suggestion that the parking structure could be placed at the location depicted in Alternative 2 will be considered by County decision-makers as they review the EIR and the project. Although noise levels at the Mental Health Unit would be higher under this alternative due to the placement of the parking structure, such levels would not be expected to reach any significance thresholds. Any adverse effects could be mitigated, at least in part, by building a block wall in the rear of the Mental Health Unit.

15.Q No decision has been made by the County decision-making body regarding the acceptance or rejection of the proposed project or any of its alternatives. In all cases the alternatives meet the majority of the primary objectives of the project as noted in Section 2.1 of the EIR and at the same time address concerns and suggestions expressed by community residents. The EIR considers the environmental impacts of the proposed project and the alternatives as required by CEQA. Economic considerations, beyond the scope of the EIR, are expressed by the client Agency, as a way of introducing concerns not to be evaluated in the EIR. These will be introduced fully by the Agency at a later time to assist the decision-making body in reaching a more informed decision on the project.

15.R The proposed 500-space parking structure is not intended to replace all the surface parking lots at the Ventura County Medical Center or be a centralized parking area. Its purpose is to provide parking for the expansion project, replace parking that is lost due to new construction, and provide onsite parking for visitors/employees who park on the streets that border the campus. As a Master Planning goal, the County of Ventura is proposing to move all hospital-related offsite parking back onsite, thereby reducing the Medical Center's parking intrusion into the adjacent residential neighborhoods.

10. Comments and Responses to Comments on the DEIR

Approximately 205 spaces in the proposed parking structure are needed to relocate the vehicles that are parked offsite, 229 spaces in the parking structure will be needed to replace the spaces that will be lost due to the new buildings, and 66 will be needed for the expansion project.

The spaces in the parking structure are not expected to be assigned to any particular use at the Medical Center. It is expected the first two levels will be allocated for general public/visitor use, while the remaining level will be assigned to employee/County Officials use on a "first come-first serve" basis. The County does not expect that people who work in different parts of the campus will all park in the new structure. The majority of the existing facilities at the Medical Center campus have sufficient surface parking directly adjacent to their buildings.

Although LLG has concluded that parking at the existing Ventura County Medical Center is essentially in balance, we also indicate that the Medical Center utilizes parking on the streets adjacent to the campus. Hence, there is a need to provide more parking. As mentioned above, it is the County of Ventura's goal to move all hospital-related offsite parking back onsite.

15.S The commentor indicates that he will provide additional information if a continuance is granted. No further response is required. The need for the proposed facility is outside the scope of the environmental impact report. No further response is required.

15.T If the environmental impact report is found to be adequate it will remain for the decision-making body to approve or disapprove the project. No further response is required.

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SEP 28 1993

ENGINEERING SERVICES

Dr. and Mrs. Wayne Bartel,
309 Agnus Drive,
Ventura, CA. 93003.

9/28

16

September 25th, 1993.

Public Works Agency,
County of Ventura,
800 S. Victoria,
Ventura, CA. 93009.
Alec T. Pringle, Project Manager.

Dear Mr. Pringle,

My wife and I have perused the County Medical Center expansion environmental impact report at the Foster library. It is, of course, so lengthy that a lay person cannot easily ascertain all the aspects of concern. We tried to reference to our location and how your plans will affect our health and environment.

Our address, 309 Agnus, is unique in so much as we are now extremely adversely affected by the generator which spews noxious fumes at us. Your proposed parking garage, which you claim to be hidden, will also blow carbon monoxide at us.

5.1-6 "Parking structure will generally be hidden by existing boiler and laundry building." This is not so with our house, we will be directly in line with it.

5.4-9 "The boiler and laundry building located between the parking garage and Agnus tend to disburse carbon monoxide". Again not true for 309 Agnus. Fumes from these buildings only add to the carbon monoxide from the garage.

5.4.1 "Sea breezes are stronger than land breezes resulting in a west to east flow." "Air quality, no such impacts are

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analyzed here, yet the sea breeze is west to east dominant."We are east of the fumes from the generator boiler, laundry and in open breeze line from the proposed parking garage.

5.4-8 "Parking garages result in high levels of C.O. known as hot spots."

5.4-9 "C.O. can be especially dangerous to people with heart disease and respiratory ailments." My wife has a diagnosed heart problem treated by medicine and I have hypertension also treated by medicine. These ailments often cause us respiratory problems.

5.1.1.1.B. "Emergency generator light noise loss of privacy one to two times a month." The generator located almost directly behind us goes off much more often than the two times a month your report claims. We are aware of it inside our house with the windows closed. The odor is foul. We look outside and see the cause is the generator. We can't even leave our car outside since it gets coated with oily residue, which we, no doubt, breathe into our lungs. This generator remains despite our many complaints. Now carbon monoxide will also blow eastward at us from the proposed garage.

5.5-1 "Excessive noise can cause physical and psychological damage. Leq noise level due to the boiler and laundry measured east of the boiler is 54.7."

5.5-6 "Engine start ups accelerated tyre squeal and car alarm noise is then added to the laundry noise level, 73.1 may occasionally be audible."

5.5-1 "Noise level diminish as the distance from the source increases." These measurements WERE obviously done near our back yard. The solution would be to move the noise farther away.

5.2.18 "The lighting impact of the garage will be to flood the nearby area with undesired lighting." We have two bedrooms which will face this light all night.

C
(cont.)

D

E

F

G

Starting with 7.3 four alternative plans are listed. Plans 1 and 2 are better than you propose and plan 4 is the best.

H

Your environmental impact report should have included concerns of all neighbors. We have talked to you at every meeting, yet our concerns are not addressed in the report. Your report does quote zoning ordinance #15. "To promote and protect health, safety and public welfare. Our health and welfare are threatened by your present plans. The E.I.R. quotes, which we have noted, show the adverse affects the present plans will have on our health. How ironic that a hospital and planning board should be doing things detrimental to our health. Perhaps you would like to pay for our health insurance.

I

We are truly grateful for the E.I.R. I see it as proof of our concerns. I hope you will not disregard our concerns which you yourself probably would find unbearable.

Sincerely,

Wayne Bartel
Jean Bartel

Wayne and Jean Bartel.

copy to Susan Lacey

10. Comments and Responses to Comments on the DEIR

Commentor: Dr. and Mrs. Wayne Bartel (Letter 16)

Date: September 25, 1993

Response:

16.A The existing emergency generator building is not within the project description of any of the four projects included in the Draft EIR for consideration. The lead agency is, however, aware of the concerns voiced by local residents regarding noise and air quality and has taken under consideration what measures might be feasible and practical to resolve these concerns.

The proposed parking structure is located to the west of the boiler, laundry, and emergency generator buildings, approximately 160 feet from the back wall of Agnus Drive residences. The south end of the parking structure may extend about 60 feet beyond the emergency generator building. Due to the topography and the planned ground floor elevation of the parking structure, the top of the structure will be below the boiler/laundry roof and at or a few feet below the elevation of the residents' backyard wall top in the area of 309 and 317 Agnus Drive. In fact, the majority of the parking structure cannot be seen from these yards and, where it is viewable, the elevations will be such that distant view should not be obstructed by the parking structure.

16.B Though the generator and any intervening structure would tend to disperse carbon monoxide and mix it through the ambient localized air condition, the real cause for a less than significant carbon monoxide impact on residential uses is their distance from the hot spot itself. Carbon monoxide disperses rapidly into the air. As discussed in the EIR, modelled carbon monoxide at the closest Agnus Drive residence is 3.6 parts per million during a worst case hourly concentration. The California state standard is 20 parts per million for a 1-hour period.

16.C The commentors note that the EIR discusses the fact that parking garages result in high levels of carbon monoxide, and that they suffer from respiratory problems.

As concluded in the EIR, the carbon monoxide concentrations that would be generated in the proposed parking structures would be dispersed to less than significant levels upon reaching the residential uses through normal dispersal and mixing processes. Sea breezes are taken into account in the CALINE4 modelling for expected carbon monoxide emissions.

16.D The emergency generator is operated 5 times a month for approximately 30 minutes each time to test the generator and insure it will operate properly in

10. Comments and Responses to Comments on the DEIR

an actual power outage. When the generator operates beyond this schedule, it is because there has, in fact, been a power outage. Consideration is being given to how the concerns of residents regarding air quality (and noise) can be resolved. As discussed in the answer to question 16.C above, the modeling results for CO emissions from the proposed parking structure are substantially less than the State 1-hour standard in the worst-case scenario for the nearest residences on Agnus Drive.

16.E The commentors quote from the EIR in noting that Leq noise levels near the boiler and laundry are 54.7. This noise level does not exceed any established threshold for noise level acceptability.

16.F The commentors correctly note that the EIR concludes that noise levels up to 73.1 decibels Leq may occasionally be audible from Agnus Drive. The EIR explains that these levels are adverse, but cannot be considered significant given the established thresholds.

16.G The commentors correctly note that the EIR explains that nighttime lighting designed to illuminate the parking structure may shed unwanted light on nearby residences.

It should be noted that design features incorporated into the proposed project (described in Section 3.7 of the Project Description) would require that lighting sources will be shielded and directed downward. In addition, mitigation measure AES-5 would require walls and landscaping to minimize vehicular headlight glare spillage from the structure.

To clarify the intent of this feature and to better respond to the commentor's concern, the following mitigation measure will be added:

AES-6 Parking Structure Lighting. The lighting for the proposed parking structure's rooftop level will be mounted on the lowest standards allowed by building code, and would be properly hooded and directed so as to eliminate any direct pooling of light onto residential properties.

16.H The commentors express a preference for Alternative 4, and further state that Alternatives 1 and 2 are superior to the proposed project.

16.I The commentor expresses the opinion that the proposed project will result in detrimental effects on their health. The EIR analyzes two issues (air quality and noise) that relate to health issues. However, in neither case have significant effects been determined to result from the proposed project, after mitigation measures are applied.

EIR Response file copy

LESLIE A. POLLARD
576 Calle de las Ovejas
Agoura, CA 91301

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ENGINEERING SERVICES

17

October 28, 1993

Mr. Alec Pringle
Public Works Agency
County of Ventura
800 S. Victoria
Ventura, CA 93000

Dear Mr. Pringle:

I am writing to you about the proposed expansion of the Ventura County Medical Center. I have been a resident of Ventura County for seven years and I was formerly a Registered Nurse. I am a single mother of two young children who, because of financial hardship, may need the services of public health services. I live at least a one-half hour drive to the VCMC facility.

The scope of the Environmental Impact Report on the expansion is remarkable for the complete absence of data on the impact of the project on the population served. In addition, the proposed expansion EIR lacks any consideration of the sweeping changes proposed by the Clinton Administration in the financing, organization and delivery of health services. While the federal government moves toward a decentralized health care delivery system based on local community facilities, the VCMC expansion moves in exactly the opposite direction and the EIR review ignores virtually all elements pertaining to impacts on the poor and indigent.

A

The EIR describes a project which claims to house in-patient mental health care, an extensive array of 'specialized' out-patient services, and operations of the county coroner.

However, a significant portion of low income beneficiaries of Medi-Cal and county indigents reside at a considerable distance from the project site and the county hospital.

The Clinton Health Reform Plan includes:

1. Universal entitlement to comprehensive health benefits
2. A clear advantage in premium costs for those enrolled in prepaid plans
3. Federal subsidies to enable both Medi-Cal eligible and county indigents (low wage workers now uninsured) to enroll in private HMO's.

If enacted, these policies will render obsolete the long standing separation of low income people into centralized, often inaccessible, public facilities such as those being operated

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by Ventura and other populous California counties.

Extensive research indicates, with great consistency, that both length of hospital stay and clinical outcome are favorably influenced when care is provided in a community setting close to home. For this reason, access is now considered by experienced health care planners to command the highest priority, especially for disabled, elderly and low income populations.

Since the useful life of a major, large scale health facility extends into at least fifty years, and, in view of the fact that this project is a public work, it is critical that the scope of this EIR be modified to answer these questions.

What travel requirements (time and distance) are placed on eligible persons in trying to comply with referrals from satellite clinics to the new facility?

What types of services will be centralized? What is the statistical frequency of utilization by eligible patients residing at a distance? What public transportation is available?

What impacts will occur in service locations as conversion to HMO proceeds? How will traditional centralization of county operated facilities fare under 'Health Reform'? Will operating revenues be affected adversely?


What impacts on county hospital operations can be anticipated by federal policies to access low income people to community based HMO's in Ventura County? Will these affect planning assumptions for utilization of project facilities? For its revenue projections?

Are there, in terms of community-wide comprehensive health planning, any viable alternatives to the centralized county service system? Can an ever growing array of hospital based ambulatory services be made more accessible to eligible beneficiaries residing at a distance from the City of Ventura?

Can available private physicians be brought back to care for low income residents by equalizing reimbursement levels by way of capitation financing?

For the very fundamental reasons listed in this letter, the EIR must be expanded to address these very pragmatic questions. Failure to address these concerns runs the very real risk of making the VCMC expansion obsolete even before construction has been completed.

Sincerely,


Leslie A. Pollard

10. Comments and Responses to Comments on the DEIR

Commentor: Leslie A. Pollard (Letter 17)

Date: October 28, 1993

Response:

17.A The VCMC expansion project, in concert with the VCMC policy of establishing satellite health care clinics in numerous locations around the County, is progressing toward the goal of decentralized health care delivery for all County citizens. These local community satellite clinics will provide primary health care for the County in their neighborhoods while the VCMC expansion project (the Ambulatory Care Clinic) will provide specialized treatment for only those patients whose treatment cannot be provided at a satellite clinic. Indigent patients will have access to both satellite clinics and the proposed project. The social effects of a project which the commentor is suggesting are not environmental impacts within the scope of the EIR and may be analyzed by the decision making body outside of the CEQA process.

17.B The travel requirements on eligible persons will be less than currently experienced as the satellite clinics come on-line and the Ambulatory Care Clinic becomes a reality. Currently, many eligible patients must travel to the VCMC for treatment which could be administered by satellite clinics. As the clinics come to fruition, the majority of patients can be seen at satellite clinics reducing current travel of patients now to the VCMC. Only patients with more specialized needs will be directed from satellite clinics to the VCMC for treatment. These services will include chemotherapy, outpatient surgical procedures, specialized prenatal care, and women's health clinic, specialized pediatric care, and a family care clinic and residency family practice program.

The statistical frequency of utilization by eligible patients residing at a distance is a question not within the scope of this environmental impact report and goes beyond what can be reasonably predicted. There is, however, no known reason to believe that eligible patients residing at a distance would require specialized outpatient services any more or less frequently than eligible patients who live near the VCMC. The implementation of the VCMC expansion project will not increase the use of public transportation, and may actually decrease its use as the satellite clinics, not a part of this project, are completed and utilized more frequently by neighborhood communities. Public transportation is currently available and services the VCMC on a regular basis.

17.C The need for the VCMC expansion project remains, regardless of the outcome of currently proposed health care reform legislation. Also, the final form of

10. Comments and Responses -- Comments on the DEIR

this legislation is not possible to predict, and the possibility of any impact is too speculative for evaluation. These questions about economic and social impacts are beyond the scope of this environmental impact report. However, if relevant information about economic and social impacts becomes available, they may be addressed outside of the EIR process by the decision-making body in reaching a decision on the project.

17.D

As noted in the answers to questions above, the County is expanding its services and developing a comprehensive health care system that extends throughout the County in the satellite clinics. Accessibility to the improved hospital-based ambulatory services will increase as patients who only need primary care begin to use satellite clinics in their neighborhoods rather than travel to the VCMC. The availability of private physicians to care for low income residents is an economic and social issue beyond the scope of this environmental impact report and not a requirement of the projects contained therein.

Mrs. Mildred A. Robinson
317 Agnus Drive
Ventura, California 93008

18

Alec T. Pringle
Project Manager
Public Works Agency
800 South Victoria Avenue
Ventura, California 93009

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NOV 02 1993

ENGINEERING SERVICES

Re: VCMC EIR Public Comment

Dear Mr. Pringle:

In 1985 when the large emergency generator building was planned by County Project Engineering and approved by the Board of Supervisors it was slipped in under Article 19 Categorical Exemptions to the California Environmental Quality Act, specifically Class 15311, ---Accessory Structures: "Class 11 consists of construction, or placement of minor structures accessory to (appurtenant to) existing commercial, industrial, or institutional facilities, including but not limited to:

A

- (a) On-premise signs;
- (b) Small parking lots;
- (c) Placement of seasonal or temporary use items such as lifeguard towers, mobile food units, portable restrooms, or similar items in generally the same locations from time to time in publicly owned parks, stadiums, or other facilities designed for public use."

At that time they promised to remove the 200kw generator sited nearby.

The 200kw generator was not only not removed but has since been tied in to the 2 1000kw generators totalling 2200kw which blast black smoke, diesel fumes and noise into our homes and yards, aided and abetted by the prevailing sea breezes.

Now they plan to build a parking garage in direct line with these generators to further foul our environment. The EIR does not deal with the cumulative impact of these combined health hazards.

B

The good faith and integrity of the county engineering dept. and the Board of Supervisors is in question. PLEASE remove the generators and give due concern to the residents of Agnus Drive in any future construction.

Sincerely,

Mildred A. Robinson

10-30-93

Mildred A. Robinson

000520

10. Comments and Responses to Comments on the DEIR

Commentor: Mrs. Mildred A. Robinson (Letter 18)

Date: October 30, 1993

Response:

18.A The emergency generator building was constructed in 1985 and categorically exempted from preparation of environmental documents as a Class II Accessory Structure under Article 19 of the *State CEQA Guidelines*. There is no record of an agreement to remove the previously existing 200 KW generator. Consideration is being given to how the concerns of residents regarding noise and air quality can be resolved.

18.B The Draft EIR does discuss noise and air quality issues regarding the Parking Structure. Based on sampling and modeling studies, neither noise nor air quality impacts from the parking structure would exceed established thresholds. And, though the generator is not technically a part of the proposed project but is discussed as part of the existing conditions under "Setting" sections in the EIR, its short-term impact on ambient noise levels and air quality have also been considered less than significant. These are discussed in Section 5.4.1.2 and in Section 5.5.1.1.b.

Therefore, the "cumulative" effects of air emissions and single-event noise levels from the Parking Structure in combination with the generator would be considered less than significant because no established thresholds would be exceeded.

October 31, 1993

19

Because of a prior engagement
I will not be able to attend
the meeting at 1:30 pm on
Wednesday November 3, 1993.

Will you, Mr. Gray and Mr.
Pachowicz, please act as my
agent/agents.

I am adamantly opposed to
a five (5) story building at
the back of my lot and home,
as well as the parking
structure just to the north
of me.

Not in my back yard!

- 1. Decrease in value
my property
- 2. Lack of privacy
WOB

Sincerely
Doreen Harrison
(Mrs Warren E.)
241 Regent Street

A

B

10. Comments and Responses . Comments on the DEIR

Commentor: Venall Hordison (Letter 19)

Date:

Response:

19.A The commentor states that she is unable to attend the Wednesday, November 3, 1993 ERRC hearing and wishes that Mr. Gray and Mr. Pachowicz be acknowledged as her agents. She further states her disapproval of a five-story structure and a parking structure just north of her.

19.B The commentor expresses a concern about a loss in property value that might occur due to implementation of the proposed project. An evaluation of effects on property evaluation is beyond the scope of this EIR and of CEQA.

The commentor expresses a concern about a lack of privacy that may result after implementation of the proposed project. The loss of privacy is discussed as a concern of the public in Section 5.1, Land Use.

20

LAW OFFICE OF
ROGER BEERS
260 CALIFORNIA STREET, SUITE 803
SAN FRANCISCO, CA 94111

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ENGINEERING SERVICES

(415) 391-2710
FAX 391-1484

November 15, 1993

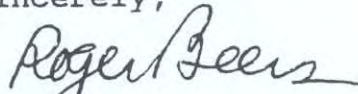
Alex Pringle
Public Works Agency
County of Ventura
800 South Victoria
Ventura, CA 93009

Re: Ventura County Medical Center Expansion DEIR

Dear Mr. Pringle:

We have been retained by Mr. Mark Pachowicz to assist him in the preparation of comments on the subject Draft Environmental Impact Report. Enclosed please find a copy of the comments submitted on his behalf. We ask that this be made part of the administrative record in this matter.

Sincerely,



Roger Beers

cc: Mark Pachowicz

000524

**COMMENTS ON THE VENTURA COUNTY
MEDICAL CENTER EXPANSION
DRAFT ENVIRONMENTAL IMPACT REPORT**

Submitted on Behalf of Mark Pachowicz

**The Law Office of Roger Beers
260 California Street, Suite 803
San Francisco CA 94111**

November 15, 1993

000525

**COMMENTS ON THE VENTURA COUNTY
MEDICAL CENTER EXPANSION
DRAFT ENVIRONMENTAL IMPACT REPORT**

I. INTRODUCTION.

These comments on the Draft Environmental Impact Report ("DEIR") for the Ventura County Medical Center Expansion are submitted on behalf of Mark Pachowicz and others who reside on Agnus Drive, in the zone of most immediate environmental impacts from the proposed project. In submitting these comments, Mr. Pachowicz continues to object to the failure of the County of Ventura to provide the timely notice to him and others of the release of the DEIR, as required by the California Environmental Quality Act ("CEQA") and to afford him and others the adequate period for review and comment on the DEIR required by CEQA. Although a brief extension was granted by the County to allow the Public Works Agency and Mr. Pachowicz respectively to respond to comments and to comment on the DEIR, that extension has not been sufficient to provide an adequate opportunity for review of and comment on the DEIR in the manner contemplated by CEQA.

A

In this and other respects, the County's rush to avail itself of funds under SB 1732 has seriously distorted the CEQA process. It is apparent that the environmental review of the project has increasingly become a sideshow that has little to do with the consideration of whether this project makes any sense and how to address its environmental impacts. As Mr. Pachowicz objected in his letter of April 18, 1993, the Board approved "in concept" the Ambulatory Care Clinic ("ACC") and the parking

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structure at its April 13, 1993 meeting without considering the impact on the environment or the draft negative declaration that had been prepared. The County has entered into a series of expensive contracts, and has another proposed for consideration on November 16, 1993, which clearly depend on the assumption that the project will proceed as proposed. In other respects, as detailed in Mr. Pachowicz' letter of April 27, 1993, County representatives have rejected other analyses of alternatives because of the investment already sunk in the proposed project. Indeed, the DEIR is itself reflective of this attitude. For example, it rejects other alternative sites on the ground that they could not be accomplished in the same rapid time frame as the proposed project. C

In what follows, we have detailed some of the serious deficiencies in the DEIR that arise from the County's effort to "expedite" the CEQA process in this manner.

II. THE DESCRIPTION OF THE PROJECT IN THE DEIR IS INCOMPLETE AND SHIFTING.

Fundamental to the successful evaluation of the environmental impacts of a proposed project under CEQA is a complete, accurate and stable definition of that project. Yet, in this instance, the sizing of the project and its components have shifted considerably during the CEQA process, so that even employees of Ventura County have expressed uncertainty about the DEIR's description of the final proposed configuration of the project. At the time of the preparation of the DEIR, some of the fundamental design elements of the project had yet to be completed. Thus, in important instances, the environmental evaluation that was done in the DEIR was based on a hypothesis of the design of particular facilities rather than the design itself. Clearly, the D

public understanding and review of the project is thwarted by this, and it is impossible to tell whether the environmental analysis is accurate when it is done on hypothetical assumptions about the project.

Examples of the project's lack of definition are the following:

- The structural drawings and the geotechnical/foundation study that are promised to mitigate the hazards of siting major components of the project in the zone of active earthquake faults are not detailed in the DEIR or apparently otherwise available to those reviewing the EIR. It is unclear whether they have even been completed. E
- The DEIR acknowledges that "[p]arking garage plans were not available" and it thus made hypothetical assumptions regarding that structure for purposes of modelling the dispersion of air pollutants from the facility. (5.4-9). F
- A memorandum from the County Planning Division, dated October 12, 1993, commenting on the DEIR, notes that it is unclear from the DEIR's tables and other references whether the changes that have been made in the project have been taken into account in the environmental analysis. G

III. THE DEIR DOES NOT ADEQUATELY EVALUATE THE IMPACTS ON THE ADJOINING RESIDENTIAL NEIGHBORHOODS.

The DEIR does not take seriously the environmental burdens that the proposed project would impose on the adjoining residential neighborhoods. For example, Agnus Drive would face a series of monolithic structures entirely out of keeping with the existing residential character of the neighborhood. Its residents will be subjected to the H

additional light and glare from these structures, the additional automobile traffic and consequent air pollution which will be newly generated by the project and concentrated by the nearby parking garage, the added noise arising from the demolition and construction program contemplated for the development of the project and the increased noise from the proximity to the massive facilities that will be sited adjacent to Agnus Drive, to mention only a few environmental assaults that the project will create.

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(Cont'd)

Yet, the DEIR largely treats the project as if it were occurring in an abstract matrix of environmental issues, rather than assessing the very concrete impacts on this residential community and the ways to mitigate those impacts. As examples of this cavalier approach to the neighborhood's environmental concerns, we note the following:

The DEIR concludes that the application of unspecified "[p]roject design features and aesthetic mitigation measures" will still leave a *significant* impact on the residents of Agnus Drive from the compatibility conflicts arising from the construction of the five-story ACC and the three-level parking structure. (2-3). Yet, it asserts that "outside of reducing the height of the structure [referring to the ACC], no measures would fully mitigate impacts." *Id.* There are, of course, a variety of mitigation measures that would serve to fully mitigate the impacts of these facilities, such as relocating one or both of these facilities or reducing the scale of both, but these are simply dismissed out of hand by the DEIR's summary quoted above. As noted below, there are similar peremptory dismissals of such measures in the DEIR's analysis of alternatives.

I

In other instances where impacts to the local neighborhood are identified, the DEIR lists certain "mitigation measures" in Table 2.4-1 purportedly to address those

impacts, but in fact these measures often have nothing to do with the impacts:

- For example, there is no explanation of how the "Demolition Housekeeping Plan" will in any manner mitigate the "[t]emporary obstruction of views" to which it is addressed. J
- Nor is there any explanation of how "Utility Undergrounding" (referring to the undergrounding of *existing* utility lines) will mitigate the significant impact resulting from the abrupt transition of scale created by the construction of the five-story ACC in proximity to the neighborhood. K
- Although the DEIR concedes that the headlights of vehicles in the parking structure "could illuminate some Agnus Drive residences" and that "[t]his is a potentially *significant* impact," the only listed mitigation measure is addressed not to eliminating this problem but to "alleviate monolithic effect" of the structure. Yet, without explanation, the DEIR then concludes that with the implementation of this mitigation measure the impact will be "[l]ess than significant." L
- The mitigation measures to address local air quality impacts on the neighborhood are often trivial, including such measures as requiring that diesel powered equipment be turned off "when not in use for more than 30 minutes," while at the same time peremptorily declaring "none required" for the "increased carbon monoxide concentrations" near the parking garage. M

Indeed, as noted above, the analysis of air quality impacts on the adjoining

neighborhood was done on the basis of a hypothetical design for the parking garage, rather than the actual design. In addition, the DEIR assumed that the pollutants from automobiles using the garage would be dispersed away from the neighborhood by the intervening boiler and laundry building. However, as noted in the letter dated September 25, 1993, from nearby residents, Dr. and Mrs. Wayne Bartel, activities in these buildings in fact generate additional fumes that affect the neighborhood in a way that will add to the impacts of carbon monoxide from the parking garage. Thus, the DEIR is mistaken in blithely assuming that these buildings will serve to disperse the air pollutants in a way that will reduce the impact on the neighborhood.

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As another example, the estimation of the project's noise impacts on the nearby residential community is done entirely in the abstract, without any measurements having been taken of the existing ambient noise levels in that community. Thus, the DEIR is left without any basis for concluding whether the noise generated by activities at the proposed project will create significant noise impacts on the nearby community, given the existing ambient level of noise in that area.

O

IV. THE ANALYSIS OF ALTERNATIVES IS INADEQUATE.

CEQA expressly requires agencies to consider a "range of reasonable alternatives" to proposed projects and to evaluate their comparative merits. Pub. Res. Code § 21100; 14 C.C.R. § 15126(d). It is not sufficient for an agency to simply consider an array of alternatives that are peremptorily dismissed or that have no prospect of actually alleviating some or all of the environmental impacts of the project under review. Instead, the CEQA Guidelines require that the discussion of alternatives

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shall focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. 14 C.C.R. § 15126(d)(3).

The California Supreme Court has emphasized the importance of a thorough consideration of alternatives. It declared that one of an EIR's "major functions ... is to ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official." *Laurel Heights Improvement Assoc. v. Regents of the University of California*, 47 Cal.3d 376, 400 (1988).¹ The discussion of alternatives cannot be cursory or present only absurd choices, but must produce "information sufficient to permit a reasonable choice of alternatives." *San Bernardino Valley Audubon Society, Inc. v. County of San Bernardino*, 155 Cal.App.3d 738, 750 (1984); 14 C.C.R. Section 15126(d)(5).

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(Cont'd)

A. The EIR's Failure to Consider a Lower Intensity of Development Violates CEQA.

The project involves over 144,000 gross square feet of new construction in an already seriously congested area. It is unfathomable that a reasonable range of alternatives would not include the consideration of building some lesser amount instead. Yet, not a single alternative in the DEIR takes a look at scaling down the proposed new

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¹ Many cases interpreting the National Environmental Policy Act ("NEPA"), the federal counterpart of CEQA, hold that the consideration of alternatives is the "heart" of the environmental review process. *Environmental Defense Fund v. Corps of Engineers of United States Army*, 492 F.2d 1123, 1135 (5th Cir. 1974); *see also, Grazing Fields Farm v. Goldschmidt*, 626 F.2d 1068, 1072 (1st Cir. 1980); *Monroe County Conservation Council, Inc. v. Volpe*, 472 F.2d 693, 697-698 (2nd Cir. 1972).

construction to attempt to mitigate environmental impacts.

The only alternative in the DEIR that considers less actual development is the mandated "no project" alternative. But, under this alternative none of the proposed development would be constructed. Alternative site plans 1-3 contemplate exactly the same amount of new construction as the proposed project, and alternative site plan 4 in fact contemplates more. Except for Alternative Site Plan 2, the net amount of new development (after consideration of demolition) is either the same or greater under all of the alternatives as the proposed project. Alternative Site Plan 2 involves more demolition -- itself a major source of environmental impacts in the proposed project.

The case of *Village Laguna of Laguna Beach, Inc. v. Bd. of Supervisors*, 134 Cal.App.3d 1022 (1982), discusses the types of alternatives that can constitute a "reasonable range" of alternatives under CEQA. In that case, the EIR on a proposed housing development of 20,000 units considered a "no project" alternative, but also alternatives that would have allowed development of 7,500, 10,000 and 25,000 housing units. The court held that the range of alternatives analyzed in the EIR was adequate because an "alternative not discussed in the EIR could be intelligently considered by studying the adequate descriptions of the plans that are discussed." *Id.* at 1029.

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(Cont'd)

No such consideration is possible in the instant case because the DEIR does not consider any alternative of lesser intensity construction. The "no project" alternative is not an alternative of "lesser development" since it does not involve any proposed development at all. The "no project" alternative standing alone -- without any intermediate choices -- cannot present "information sufficient to permit a reasonable

choice of alternatives." *San Bernardino Valley Audubon Society, supra*, at 750.

Instead, it merely presents the County with a "take it or leave it" option of having none of the proposed new construction or all of it. The DEIR affords no opportunity to see how the County's needs and the environmental harms posed by the project could be balanced in some compromise alternative that would allow some new construction, but not the entire amount of new construction contemplated in the proposed project.

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(Cont'd)

Similarly, while considering variations in the allocation of new parking between "surface spaces" and "structure spaces," the alternatives considered in the DEIR steadfastly cling to the assumption that at least 500 new spaces will be provided -- the same amount as the proposed project. Given that the additional traffic and impacts from the development of any new parking spaces are of concern to the neighbors of the VCMC, it was imperative to consider development of a lesser number of spaces and the potential for reduction of the impacts associated with such facilities.

R

In a letter dated April 27, 1993, Mr. Pachowicz presented facts establishing that the County does not need the additional parking facilities to serve the needs of the VCMC campus. Among other things, he quoted from the study conducted for the County by Linscott, Law and Greenspan which concluded that "parking at the existing Ventura County Medical Center is essentially in balance, with parking demand equaling parking supply." Despite these comments, the DEIR does not attempt in any manner to justify the plan for this parking garage, and none of the alternatives considered include the elimination or even a substantial reduction in the number of parking spaces proposed in the project.

B. The DEIR's Review of Alternative Site Locations is Contrived to Avoid Consideration of Meaningful Alternatives.

Nowhere is it more apparent how contrived the DEIR's analysis of alternatives is than in its consideration of "Alternative Site Locations." *First*, after conceding that the Government Center and Lewis Road sites are large enough and "reasonably available" to the County for development, the DEIR inexplicably rejects both sites on the ground that the two facilities that would be sited there would require design modifications for those sites. (7-23). There is no description of the nature or magnitude of the design changes that would be required. Indeed, there is nothing presented that would indicate that the design modifications are anything more than what would be inherently required for any project to be adapted from one site to another. If this were a ground for rejecting an alternative site under CEQA, then no alternative site would ever be considered feasible for any project because necessarily every project would entail some design modifications for adaptation to a different site. S

Without further explanation, the DEIR then concludes that the fact of these unexplained design modifications would necessarily mean unacceptable project delays. Thus the DEIR states that the alternative sites are not "reasonable" for the Mental Health Unit "and the County's needs would not be met." (7-23). Likewise, the Government Center is rejected as an alternative location simply on the unexplained hypothesis that the two facilities would have to be "redesigned and site adapted to the alternative site, causing unreasonable delays for the construction" of the two. *Id.* T

This kind of treatment of alternatives is clearly insufficient under CEQA. While the DEIR purports to apply the criteria in the Supreme Court's decision in *Citizens of Goleta*

Valley v. Board of Supervisors, 52 Cal.3d 553 (1990), it ignores the teaching of the earlier reported decision in that case that any review of the feasibility of alternatives must be backed up by data and analysis in lieu of bald assertions. See *Citizens of Goleta Valley v. Board of Supervisors*, 197 Cal.App.3d 1167 (1988). Moreover, even if the timing of development had now reached the point that the facilities at these other locations could not meet the County's objectives, there would remain the question whether this is true solely because of the way that the County has chosen to rush the CEQA process at the end of its planning. To the extent that its commitment to the present site and designs for that site have become entrenched prior to the analysis of these other locations that is in itself a violation of CEQA. Environmental review under CEQA must be done as early as possible in the planning process "where genuine flexibility remains." *Mount Sutro Defense Committee v. Regents of the University of California*, 77 Cal.App.3d 20, 34 (1978). See also, *Sundstrom v. County of Mendocino*, 202 Cal.App.3d 296,307 (1988).

Second, the DEIR ultimately dismisses these alternative sites because they would require duplication of other facilities offered at the main campus as part of the County's premise of increasing its provision of centralized health care facilities. But this series of reasons for rejecting the Alternative Site Locations simply make clear that these alternatives were never intended to provide meaningful options for the County to consider in comparison the proposed project. Rather, these alternatives were clearly formulated only for the purpose of satisfying some rote notion of CEQA compliance. Thus, if these alternatives are not feasible because they do not fit within the County's

premise of building centralized health care facilities then by definition they do not satisfy the requirement of CEQA that the alternatives considered in the DEIR be ones that are feasible and capable of achieving the project's objectives.

If the County was going to assert these as reasons for rejecting these alternatives then it was foolish to include them in the DEIR in the first place. All of the reasons advanced for rejecting these alternatives in the DEIR raise more fundamental questions about the basic approach which the County has taken in continuing to emphasize the provision of centralized health care facilities to low income people, at a time when there are proposals at both the federal and state level which fundamentally seek to decentralize health care. We will not detail these matters in these comments except to refer to the comments that have already been lodged with the County on this subject. See Letter from Leslie A. Pollard, dated October 28, 1993. For present purposes, the point is that the reasons advanced against these alternative site locations are simply reasons why the County should have considered more fundamental alternatives to its project, such as programs to develop and provide more de-centralized health care in combination with already existing facilities at private and public institutions. The evaluation of the environmental impacts of that kind of alternative, in comparison to the proposed project, could have provided the decision-makers with a meaningful choice -- rather than just an academic exercise which is ultimately dismissed because it is contrary to the basic premise underlying the proposed project.

C. The DEIR Provides no Adequate Justification for the Rejection of the Onsite Alternatives as Infeasible.

The DEIR attempts to justify the rejection of all of the onsite alternatives by the

flimsiest of excuses. The assertion that the Mental Health Unit would be too far away from the main Hospital if its location was traded for that of the ACC (in Alternative 3) makes no sense on its face without further explanation, given that both of the facilities at either location are immediately adjacent to the Hospital. The other reasons advanced for rejection of the remaining alternatives on site are equally implausible on their face. These issues were again addressed in a letter from Mr. Pachowicz, dated April 27, 1993, but the DEIR still makes no attempt to justify its exclusion of these alternatives on anything but conclusionary grounds.

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V. The EIR Fails to Adequately Consider the Cumulative Impacts of the Proposed Project and Other Foreseeable Projects.

CEQA specifically requires an analysis of cumulative impacts in the EIR. Public Resource Code Section 21100; CEQA Guidelines, Section 15126. Cumulative impacts include: (a) individual effects from a single project; or (b) the incremental impact of the project when added to other related past, present and reasonably foreseeable future projects. CEQA Guidelines, Section 15355.² California courts have repeatedly recognized the importance of the cumulative impact analysis in the EIR process. *Bozung v. Local Agency Formation Commission of Ventura*, 13 C.3d 263, 283 (1975); *San Franciscans for Reasonable Growth v. City and County of San Francisco*, 151 Cal.App.3d 61, 73 (1984) (part of the "vital information function" of the EIR is performed

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² The Guidelines are very specific about how an EIR is to conduct this analysis: Either a list of "past, present, and reasonably anticipated future projects" or a summary of projections contained in an adopted general plan must be included in a discussion of cumulative impacts for the EIR to contain an "adequate discussion" of those impacts. Guidelines Section 15130(b).

by a cumulative impact analysis); *Whitman v. Board of Supervisors of Ventura County*, 88 Cal.App.3d 397, 407 (1979). Courts have held that it is "vitally important that an EIR avoid minimizing cumulative impacts," and have struck down agency decisions when an EIR did not fully comply with CEQA's requirement to analyze such impacts. *Citizens to Preserve the Ojai v. County of Ventura*, 176 Cal.App.3d 421, 431 (1986). The EIR in the instant case does not contain a sufficient description of cumulative impacts under either definition.

The DEIR purports to consider cumulative impacts only in connection with the analysis of traffic impacts and air quality impacts, and does not otherwise analyze what cumulative impacts this project would have with others. Moreover, the DEIR assumes that the project's contribution to cumulative air quality impacts is insignificant only because the project's individual air quality impacts are estimated to be "less than County significance thresholds." (5.4-10). This mode of analysis simply sidesteps altogether the cumulative impacts of the project since by definition it makes cumulative impacts a matter of concern only if the project's individual impacts are significant. The requirement to analyze cumulative impacts goes beyond this.

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(Cont'd)

Thus, the approach taken in the DEIR was specifically rejected in the case of *Kings County Farm Bureau v. City of Hanford*, 221 Cal.Ap.3d 692 (1990). In that case the EIR stated:

"The fact that a variety of expected future projects in the cumulative impacts analysis may, in combination, result in a substantial increase in PM10 or ozone precursor emissions does not automatically mean that any individual project must be classified as having a significant adverse effect under CEQA...A question must still be answered as to whether the incremental effects of an additional project are considerable when viewed

in connection with the effects of other projects. In this case, the EIR has reached the conclusion that incremental effects of the project studied by the EIR are not significant, even though the cumulative ozone impacts of Valley-wide energy development might be considered substantial." *Id.* at 719.

The court rejected the approach of focusing upon the ratio between the projects' impacts and the overall problem. The relevant question the court held is not the relative amount of ozone precursors compared to preexisting emissions but "whether any additional amount of precursor emissions should be considered significant in light of the serious nature of the ozone problems in this air basin." *Id.* at 718.

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In other respects the treatment of cumulative impacts in the sections on traffic and air quality are entirely conclusory. In *Whitman, supra*, the court considered an EIR for an oil drilling project which contained the conclusory observation that the cumulative impact of the project in combination with several others included "increased traffic . . . and a minor increase in air emissions." 88 Cal.App.3d at 406. The court found this limited discussion to be inadequate stating that "the courts have favored specificity and use of detail in EIRs." *Id.* at 411. Here, the cumulative impact discussion in the EIR lacks even a minimal degree of specificity or detail. Rather, the "discussion" is but a conclusion utterly devoid of any reasoned analysis. It provides neither the responsible agency nor the public with the type of information called for under CEQA.

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VI. The DEIR Fails to Provide an Adequate Evaluation of Mitigation Measures.

The DEIR lacks adequate, enforceable mitigation measures. So called "mitigation measures" proposed in the DEIR consist of deferring mitigation to the future, the

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preparation of future designs or plans (*see, e.g.*, AES-1, AES-2, AES-5, AQ-9), continuing current policies, complying with regulations that the County must already comply with, and mitigating only "when feasible." In other respects, the DEIR simply assumes that mitigation measures will be undertaken in the future without specifying what agency will be responsible for the mitigation, such as some of the roadway improvements deemed necessary to mitigate the cumulative impacts of the project. These "mitigation measures" do not meet the standards set by CEQA.

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Perhaps the most egregious instance of reliance on future mitigation concerns an environmental hazard not evaluated at all in the DEIR -- the proposal to locate major components of the project in an area of a known active earthquake fault. The only acknowledgement of this problem in the DEIR occurs at page 3-13, where it is stated that the proposed Medical Examiner Facility and the proposed parking structure respectively "will be built in accordance with recommendations contained in a 1992 geotechnical report" and "in accordance with recommendations *to be contained* in a geotechnical report as part of project design." (emphasis added). The conclusions of the former report are not addressed at all in the DEIR, and the latter report has apparently not been done. In neither instance does the DEIR spell out any specific design modifications of the project to address the seismic concerns -- much less does it evaluate their effectiveness. ³

AD

As another example, the DEIR suggests the realignment or widening of certain

³ The DEIR's failure to address at all the seismic concerns of the project is discussed further below, not only as a violation of CEQA but also potentially of the Alquist-Priolo Special Studies Zones Act, Public Resources Code Sections 2621 *et seq.*

roadways and ramps as mitigation measures for the cumulative environmental impact of the traffic generated by the project in conjunction with other projects. However, while concluding that this should mitigate the cumulative impacts, it does not contain any indication of who will undertake these measures, over what time frame they will be done, or whether the funding is available for these measures. The memorandum, dated September 30, 1993 from the Department of Transportation, commenting on the DEIR, recommends that the County be responsible for the financing of these improvements, but nothing in the DEIR indicates that the County is ready to take responsibility for this.⁴ SB 1732 does not appear to provide funding for this kind of major highway reconstruction, and the County cannot sidestep its responsibility to identify in the DEIR what entity will be responsible for such an important mitigation measure.

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(footnote)

Equally inexcusable is the DEIR's assertion that no mitigation is required to address the "poor operating conditions at three intersections" arising from the cumulative impacts of the project in conjunction with other pending or future development. (2-5). The reason advanced for this refusal to develop any mitigation measures to address this problem is that facilities administered by a public agency like the County are not required as a matter of law to contribute to the City's Traffic Mitigation Fee Program. But the fact that laws other than CEQA do not require the implementation of particular mitigation measures does not mean that the CEQA's

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⁴ While proposing a variety of other perfunctory mitigation measures to address the localized traffic impacts of the project, one of the potentially most promising -- the imposition of a "Trip Reduction Plan" -- has yet to be developed in any fashion for the project. (2-6).

independent obligation to develop and implement mitigation measures has been satisfied. Clearly, the County's stance in this regard is unlawful.

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CEQA requires that EIR's contain adequate evaluation of measures to mitigate adverse environmental impacts. Public Resources Code Section 21100(c); 14 C.C.R. Section 15126(c). In addition, the CEQA Guidelines further provide that a public agency shall not approve or carry out a project which has one or more significant environmental effects unless it has "[e]liminated or substantially lessened all significant effects on the environment where feasible." 14 C.C.R. Section 15092(b).

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The courts have stringently enforced these requirements. First, they hold that CEQA requires that such mitigation measures be fully developed and the subject of a binding commitment, if the agency is going to rely on such measures as a basis for assuming that project impacts will be mitigated. *See, Citizens for Quality Growth v. City of Mount Shasta*, 198 Cal. App. 3d 433, 441 (1988). Second, agencies may not assume that actions to be taken by third parties will mitigate project impacts without contractual commitments. *See, e.g., Preservation Coalition, Inc. v. Pierce*, 667 F.2d 851, 860 (9th Cir. 1982) ("firm commitments" by other parties may be sufficient, but these commitments must be "more than vague statements of good intentions"). Third, agencies must demonstrate that the proposed mitigation measures will in fact be effective.

Several recent Ninth Circuit cases have also held that agencies may not rely on mitigation measures by simply listing them, but must "specifically explain how the [measure] will mitigate the adverse environmental consequences." *La Flamme v.*

FERC, 842 F.2d 1063, 1071 (9th Cir. 1988). See also, *The Steamboaters v. FERC*, 159 F.2d 1382, 1394 (9th Cir. 1983). Finally, mitigation measures may not be delegated to the future as they in effect are in the DEIR. See, *Sundstrom v. Mendocino*, 202 Cal.App.3d 296 (1988).

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The mitigation measures in the DEIR do not meet any of these tests.

VII. The DEIR is Inadequate Because it Fails Entirely to Consider the Acknowledged Seismic Hazards Associated with the Site.

Under 14 C.C.R. Section 3603, adopted to implement the Alquist-Priolo Act, Public Resources Code Sections 2621 *et seq.*, buildings constructed for human occupancy must be sited at least fifty feet from any active fault, unless it can be proven that the area within fifty feet of the fault is free from branches of active faults. The DEIR contains no analysis whatsoever of the seismic hazard associated with the site, despite the fact that the Initial Study acknowledged that major parts of the proposed facilities were near an active earthquake fault and were within Alquist Priolo Special Studies Zones.

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The Initial Study did not itself evaluate to any degree the hazards associated with construction of these components at that site. Instead that document simply stated that geologic reports would be done on these facilities at some point in the future and the facilities would be built in accordance with the recommendations in those reports. The County's internal geology review for the DEIR, as reflected in the memorandum from Jim Fisher, dated October 13, 1993, emphasizes that the DEIR does not deal with geologic and seismic issues because the Initial Study Checklist indicated that this was a "less than significant" impact. Mr. Fisher states that "I cannot support this finding"

because he has not seen "any structural drawings or geotechnical/foundation study that accommodates the anticipated displacement found in the Staal, Gardiner and Dunne fault study of 1992." That study is not evaluated at all in the DEIR or even in the Initial Study.

AJ
(Cont'd)

The failure to adequately consider a major environmental hazard is a clear violation of CEQA. The County cannot avoid CEQA's mandate to ensure that "major consideration is given to preventing environmental damage" by simply failing to identify and study serious problems in the DEIR, or by offering perfunctory references to future studies. Pub. Res. Code Section 21000(g). Specifically, CEQA requires agencies to analyze "any significant environmental effects the project might cause by bringing . . . people into the area affected." 14 C.C.R. Section 15126(a). The illustration of this concept contained in the regulation is especially apt here: "For example, an EIR on a subdivision astride an active fault line should identify as a significant effect the seismic hazard to future occupants of the subdivision."

VIII. The DEIR Violates CEQA By Failing to Adequately Consider the Growth Inducing Impacts of the Proposed Project.

A. The DEIR Fails to Consider the Extent to Which the Building Program Will Induce Additional Campus Employment and Patient and Visitor Growth.

CEQA specifically requires that an DEIR analyze the growth inducing impacts of a project, both in terms of economic and population growth. Pub.Res.Code § 21100(g); 14 C.C.R. § 15126(g). Surely, common sense tells us that the construction of over 144,000 square feet of new buildings at a hospital campus is likely to induce growth in the workforce and patient population using those facilities. The DEIR, however, just

AK

blandly assumes that there will be no such growth. Consequently, the half page section on growth inducement in the DEIR makes no attempt whatsoever to consider whether the proposed project will have a growth inducing impact on the campus workforce and visitor population, and what the repercussions of that growth could be.

AK
(Cont'd)

B. The DEIR Fails to Adequately Consider the Secondary Growth Inducing Impacts of the Project.

The growth inducing impacts of the proposed project stem not only from the direct impacts of constructing so much new space on the population of the Campus, but also from the secondary impacts of the project. CEQA requires that the indirect or secondary impacts of projects be considered in an EIR. 14 C.C.R. § 15126 (g). This DEIR ignores the potential secondary impacts that could stem from this new development, particularly satellite development such as private medical practice offices and ancillary services. The DEIR notes that one of the "primary reasons" for locating the projects on the VCMC campus is the "concentration of population and urban infrastructure in the area, including private medical practices." (7-23). Yet, the DEIR nowhere acknowledges the potential of the proposed project to induce additional growth in the area, from the increased demand for other ancillary services and private medical practices.

AL

The necessity for doing this kind of analysis cannot be avoided by labeling it "speculative." The courts have rejected the notion that an agency can refuse to consider secondary impacts simply because the exact nature and timing of those impacts are not known. *City of Antioch v. City of Pittsburgh*, 187 Cal.App.3d at 1334-1335; *Citizens Ass'n for Sensible Development of Bishop v. County of Inyo*, 172

Cal.App.3d at 168-169. The courts recognize that "[d]rafting an EIS/EIR necessarily involves some degree of forecasting." *City of Davis v. Coleman*, 521 F.2d 661, 676, (9th Cir. 1975).

AL
(Cont'd)

The court in the *City of Davis* case rejected the argument that the future development that would be induced by a proposed freeway interchange was too speculative to be considered in an EIR. *Id.* Even though the ultimate decisions on that development were in the hands of "private parties and local governments" outside the control of the lead agency, that agency still had to prepare an EIS/EIR that would "evaluate the possibilities in light of current and contemplated plans and . . . produce an informed estimate of the environmental consequences." *Id.* Despite the law's clear mandate to consider secondary growth inducing aspects of the proposed project and the clearly foreseeable nature of these impacts, the DEIR simply ignores them. Such a disregard of the impacts of a project is a violation of CEQA.

IX. CONCLUSION.

The above deficiencies in the DEIR cannot be cured by attempting to deal with them in the Final EIR. The essential opportunity of the public and other agencies to comment on a full evaluation of the environmental impacts of the proposed project will be denied if that course is followed. The only way that the County can secure compliance with CEQA is to revise the Draft Environmental Impact Report to cure these deficiencies and recirculate that draft to the public for comment.

AM

10. Comments and Responses to Comments on the DEIR

Commentor: Roger Beers, Law Offices of Roger Beers, on behalf of Mr. Mark Pachowicz

Date: November 15, 1993

Response:

- 20.A** The County of Ventura complied in all respects with the provisions of CEQA in notifying the public of the intention to prepare an EIR as well as the completion of a DEIR and its availability to the public for comment. The public comment period of 45 days was adequate opportunity to review and comment on the DEIR in the manner contemplated by CEQA. See response 15A for further comment.
- 20.B** The preparation of the environmental documents for this DEIR began in July 1992 with the Initial Study. Environmental impacts began being addressed at that point and have been a key consideration in preliminary engineering work that has been completed to date on the Ambulatory Care Clinic. The preparation of the initial study and the DEIR over a 16-month period has provided ample consideration to the environmental impacts of the project in an atmosphere of considered thought contemplated by the CEQA process. See also response to 20.D.
- The County has not approved the proposed project within the meaning of CEQA by entering into the referred to contracts. These contracts will provide information helpful to the decision-makers when they consider a decision on the project. The contracts do not bind the County to any particular decision on the project. Moreover, the contracts provide some of the very design information that the commentor says is necessary for an adequate EIR project description under CEQA.
- 20.C** No decision has been made by the County decision-making body regarding the acceptance or rejection of the proposed project or any project alternatives. All of the alternatives meet the majority of the project objectives and address concerns and suggestions raised by community residents. The economic and timing considerations discussed in the EIR are expressed by the Health Care Agency as a means of introducing to the public and decision-makers the feasibility concerns that are beyond the scope of and unnecessary to the EIR's environmental analysis of the alternatives.
- 20.D** As discussed in Response 15.F, the only revisions that have occurred to the proposed project are a 13,755 square-foot reduction in the size of the ambulatory care clinic and a reduction in the number of onsite parking spaces to be added. This change occurred after the circulation of the May 1993 NOP/Initial Study, but prior to the preparation of the Draft EIR. Because it

10. Comments and Responses to Comments on the DEIR

was determined that these changes were minor in nature and would not result in any additional environmental impacts, recirculation of the NOP was not necessary. There have been no subsequent changes to the project description.

Although architectural design of some components of the proposed project had not been finalized at the time of the preparation of the EIR, the size and massing of all structures had been determined. Because the impacts associated with the proposed project relate primarily to building height and massing of the ACC, the project description provided in the EIR provides an adequate basis for the analysis of environmental effects. The project description is consistent with the requirements of Section 15124 of the *Guidelines for Implementation of California Environmental Quality Act*, which states that an EIR project description "should not supply extensive detail beyond that needed for evaluation and review of the environmental impact."

Ironically, the commentor notes that the design information alleged necessary in the EIR for the project description is characterized in other comments by the commentor (see 20.B) as a project approval prior to the completion of the EIR when the contracts to obtain this information are entered into.

20.E

A geotechnical and a geological study for the proposed Medical Examiner Facility was completed in 1992. That report is available at the Ventura County Public Works Agency. The recommendations of those reports were incorporated into the design and project description of the project when the design was completed in February 1993. A standard geotechnical report will be prepared for the proposed parking structure due to its occupancy category and its location within an Alquist-Priolo zone. Compliance with the recommendations of that report incorporated into the design and project description will reduce geologic/seismic impacts to a less than significant level. Also, please see Letter 23, from the Development & Inspection Services Division of the County Public Works Agency, dated November 15, 1993. The geotechnical and geological reports for the Medical Examiner's Facility will be added to the EIR as an appendix.

20.F

Although design plans for the proposed parking structure have not been finalized, the location, number of spaces and levels, and basic layout of the structure are known. These inputs provided an adequate basis for the modelling of carbon monoxide concentrations associated with the structure. As discussed in EIR Section 5.4.2.2.b, CO concentrations associated with the parking structure would be substantially below state and federal standards in all instances.

10. Comments and Responses to Comments on the DEIR

20.G

As discussed in Response 5.A, the minor revisions to buildout of the proposed project that occurred after the circulation of the May 1993 NOP/Initial Study were incorporated into the EIR Project Description and have no effect on the environmental analysis.

10. Comments and Responses to Comments on the DEIR

- 20.H EIR Sections 5.1, Land Use, and 5.2, Aesthetics/Shadows/Light and Glare, address the effects of the increased intensity of development on adjacent Agnus Drive residences. Land use and aesthetic impacts associated with the proposed ambulatory care clinic were found to be significant and unavoidable.
- Sections 5.4 and 5.5 address both the temporary and long-term air quality and noise impacts associated with the proposed project. As acknowledged in the EIR, temporary air emissions and noise would be generated as a result of project construction and additional long-term impacts would be created by the proposed new structures, particularly the parking structure. However, neither temporary nor long-term air quality or noise effects would meet or exceed any established County or City thresholds. Therefore, impacts are considered less than significant in both of these issue areas.
- 20.I It is true that relocating some proposed structures would reduce or eliminate some of the significant land use and aesthetic impacts associated with the proposed project. However, relocation of structures would be considered a project alternative rather than a mitigation measure. As such, relocation of both the proposed parking structure and ACC has been considered in four project alternatives (see EIR Section 7.0). As discussed in EIR Section 7.3, two of these alternative site plans are considered environmentally superior to the proposed project.
- 20.J As discussed in EIR Section 5.2.2.2.a.1, short-term aesthetic impacts are considered less than significant because they are temporary in nature. Therefore, no mitigation is necessary for such impacts. Nevertheless, Measure AES-1, Demolition Housekeeping Plan, is recommended to minimize aesthetic impacts to the adjacent community during project construction and to the extent possible at this stage gives examples of how view obstruction can be minimized.
- 20.K Utility undergrounding would not mitigate the significant impacts related to the abrupt transition in scale that would be created by the ACC. As discussed in the EIR, such impacts would remain significant and unavoidable. Nevertheless, Measure AES-3 is recommended as a means to improve the general appearance of the VCMC site, particularly as viewed from residences along Agnus Drive.
- 20.L Measure AES-5, Parking Structure Walls/Landscaping, is intended to alleviate the monolithic effect of the parking structure and to reduce the effects of vehicle headlights on Agnus Drive residences. The second sentence of the measures states that:

10. Comments and Responses to Comments on the DEIR

Walls shall be of sufficient height to block vehicular lighting from projecting outside of the structure.

Implementation of this component of Measure AES-5 would reduce impacts associated with vehicle headlights to a less than significant level.

20.M

As discussed in EIR Section 5.4.2.1, the Ventura County APCD has not established any significant thresholds for construction-related air quality impacts. Thus, although no significant construction-related impacts were identified and no mitigation measures are necessary, construction mitigation measures have been recommended. These measures would reduce construction-related emissions to some degree.

As discussed in Section 5.4.2.2.b, carbon monoxide concentrations associated with the proposed parking structure would not cause any significant effect on local air quality. Thus, no mitigation measures are required.

20.N

The generator and laundry buildings would tend to disperse carbon monoxide from the proposed parking structure, as would the distance from the structure to the Agnus Drive residences. As discussed in EIR Section 5.4.2.2.b, CO levels at the nearest Agnus Drive residences in the worst case scenario would be about 3.6 parts per million (ppm), which is substantially below the state standard of 20 ppm. Also, please see Responses 16.B and 20.F.

Although fumes from the generator would cause a cumulative effect when the generator is operating, the generator typically operates only about five times a month for approximately 30 minutes each time. This level of operation would not result in an exceedance of any air quality standard at any Agnus Drive residence. Also, please see Response 16.D.

20.O

As discussed in EIR Section 5.5.1.1.b, monitoring of existing noise levels on the VCMC campus was conducted at two locations: immediately west of the emergency generator on the site of existing surface parking and east of the boiler and laundry building immediately adjacent to Agnus Drive residences. In addition, projected parking structure noise levels were based upon monitoring conducted by Fugro-McClelland in February 1993 at a 4-level parking structure located near the Community Memorial Hospital in Ventura (see EIR Section 5.5.2.1.a).

20.P

In accordance with Section 15126 (d) of the *Guidelines for Implementation of the California Environmental Quality Act*, Section 7.0 of the EIR focuses on alternatives capable of eliminating significant adverse environmental impacts or reducing such impacts to a level of insignificance. These include

10. Comments and Responses to Comments on the DEIR

two alternatives that change the location of the proposed parking structure and two that change the location of the proposed ACC. Two of the alternatives (Alternatives 1 and 4) were found to be environmentally superior to the proposed project, particularly in terms of land use and aesthetic impacts. Also, please see Response 20.C.

20.Q

CEQA does not require the evaluation of a reduced size alternative. Rather, Section 15126(d)(3) of the *Guidelines for Implementation of the California Environmental Quality Act* requires that EIRs focus on "alternatives capable of eliminating significant adverse environmental effects or reducing them to a level of insignificance." Although a reduced size alternative is often evaluated because of its potential to reduce overall environmental effects, examination of such an alternative is not required if other alternatives to eliminate environmental impacts are available. Moreover, alternatives 1, 2 and 4 in the EIR do reduce the size of the parking facilities built on the site.

The only significant residual environmental effects associated with the proposed project are land use and aesthetic impacts related to the abrupt transition of the scale of the ACC as compared to the adjacent residential properties on Agnus Drive. Impacts associated with this conflict could be mitigated through redesign or relocation of the ACC, both of which were considered in two project alternatives (Alternative Site Plans 3 and 4). All of the project alternatives were formulated in part on the basis of input from area residents at the April and July 1993 public hearings on the proposed project. Thus, the EIR alternatives analysis is consistent with the requirements and spirit of CEQA.

20.R

The primary concerns regarding the proposed parking structure have revolved around the potential for increased local air pollution and noise and the alteration of views. Although the EIR analysis did not identify any significant impacts in any of these issue areas, two alternatives that would relocate the structure were examined due to the substantial community concern about the parking structure. Both of these alternatives (Alternative Site Plans 1 and 2) would move the parking structure farther from the Agnus Drive residences and lower the height of the structure, thus further reducing the potential for air quality, noise, and viewshed impacts on the Agnus Drive neighborhood. Thus, the alternatives analysis fulfills the requirements of Section 15126(d) of the *Guidelines for Implementation of the California Environmental Quality Act*.

It is not the intent of the EIR to justify the need for the 500-space parking garage. Rather, the purpose of the EIR is to evaluate the environmental impacts of the project, as proposed. Section 3.6.4 of the EIR Project

10. Comments and Responses to Comments on the DEIR

Description does, however, contain a discussion of the need for the parking structure.

Although parking on and around the VCMC is essentially in balance, available parking currently includes a number of offsite spaces along adjacent streets. One of the goals for the structure is to move campus patrons from off-street parking spaces into campus parking facilities. In order to accommodate this shift, and to accommodate the increased demand associated with the Mental Health Unit expansion and the loss of parking due to construction, and provide a circulation factor, a 500-space structure would be needed.

- 20.S The sites discussed in Section 7.2.1 of the DEIR are rejected for a variety of reasons as discussed. The design changes were one component of the discussion regarding the timing of carrying out the offsite alternative. The implication for design changes is noted in the Health Care Agency comments under Section 7.4. The redesign is one factor in answering one of the several questions posed by the courts decision in *Goleta v. Board of Supervisors* and is not standing on its own as the sole reason for rejection of offsite alternatives.
- 20.T The question posed by *Goleta v. Board of Supervisors* in this instant is whether or not the timing of the alternative is reasonable for the applicant. Project implementation is based on a schedule of EIR approval and project design and construction, which is reasonable and attainable. The impact of redesign and site adaption as noted in Sections 7.4 and 7.2.1(4) will clearly delay the proposed project implementation and in conjunction with the other delays, not reasonably meet the timing of the applicant in carrying out the alternative.
- 20.U The alternative sites discussion is not presented as an alternative to be included and compared with the other alternatives that are included in the EIR. As noted in Section 15126(d)(1) of the *CEQA Guidelines*, it is only necessary to "explain why the other alternatives were rejected in favor of the proposal if they were considered in developing the proposal." It was not intended to provide the level of detail and the associated comparative evaluation of the merits of the offsite alternative with the alternatives that were provided for comparison in the EIR. The timing of the development is not the primary issue for rejecting the offsite alternatives. The offsite alternatives are rejected from consideration as meaningful alternatives in the EIR primarily for their inability to meet the basic objectives of the project. Offsite alternatives do not provide flexibility in the decision-making process based on the objectives of the project.

10. Comments and Responses to Comments on the DEIR

- 20.V** The discussion of offsite alternatives was included in the EIR to explain why the other alternatives (in this case, offsite alternatives) were rejected in favor of the proposal. It was also included to answer the anticipated comments that would be made about the EIR that the EIR did not answer public suggestions that offsite alternatives be considered. Agency review of ideas from the public meetings suggested that offsite alternatives were in all likelihood infeasible because they did not meet basic project objectives. The decision was made, however, to proceed with a discussion section on offsite alternatives in the EIR to show why, in three most favorable offsite situations, the offsite alternatives were not feasible.
- 20.W** As discussed in Section 3.6.2 of the DEIR and in response to comment 17A, the County approach is not to continue the emphasis of centralized health care facilities to low income people at the VCMC. The direction and emphasis of the County is to provide decentralized primary care to all County citizens, including those of low income, through the opening of numerous satellite clinics throughout the County while replacing and consolidating the existing specialized clinics at the VCMC which provide out-patient care not available at satellite clinics.
- 20.X** The County, by its action in opening satellite clinics, is working in concert with the objectives of the proposed project. The consideration of utilizing existing private and public institutions in lieu of the proposed project does not meet the basic objectives of the project. Where the alternatives can not feasibly attain the basic objectives of the project, it need not be considered.
- 20.Y-Z** The alternatives have not been rejected or excluded in the DEIR. The discussion is provided from the County Health Care Agency to provide the decision-making body with concerns regarding the alternatives which are not appropriate to be considered in the comparative evaluation of environmental impacts in the DEIR. As a part of the decision-making process, the Agency may provide additional information regarding the proposed project and alternatives beyond the environmental issues in the DEIR.
- 20.AA** The EIR discusses cumulative effects for each of the five environmental issue areas analyzed. In terms of land use and aesthetic impacts, quantification of cumulative effects is not possible. Therefore, the cumulative discussion includes a qualitative description of the general intensification of urban uses that would occur in the Midtown area of Ventura with cumulative development.
- The cumulative traffic analysis considers the increase in vehicle trips associated with currently proposed developments in the City of Ventura's

10. Comments and Responses to Comments on the DEIR

pending projects list, as well as an annual growth rate of 1.5 percent to account for regional traffic growth.

In terms of traffic, the project did not result in any significant impact. However, future traffic volumes under the cumulative scenario, including those generated by the Buenaventura Mall Expansion, would cause significant cumulative impacts. Three locations were identified in Section 5.3 of the EIR. The funding for the improvements at these locations (Mills/Main, U.1. 101/Main, and Mills/Telegraph) is expected to come from the Traffic Mitigation Fees collected by the City of San Buenaventura.

The EIR will be modified to reflect the following: Although the VCMC is not currently required to participate in the City of Ventura Traffic Mitigation Fee Program to fund these improvements, it will contribute a reasonable share if requested to do so in the future.

In terms of noise, the primary impacts evaluated in the EIR are associated with project construction and the proposed parking structure. Because these types of impacts are temporary or localized in nature, they would not contribute to significant cumulative noise effects. As discussed in the May 1993 Initial Study, although noise levels along Loma Vista (the road most affected by project-generated traffic) currently exceed the 60 dBA City threshold, the proposed project would increase noise along that corridor by only 0.1 dBA, which would not be perceptible. Consequently, traffic-related noise impacts were not considered significant and were not the subject of further study in the EIR.

According to the 1991 Ventura County Air Quality Management Plan (AQMP), a project is considered to have a significant cumulative adverse air quality impact if it will result in emissions of greater than 2 pounds per day of ROC or NO_x and is found to be inconsistent with the AQMP. The proposed project would result in ROC and NO_x emissions exceeding 2 pounds per day. However, projects are considered inconsistent with the AQMP only if they are inconsistent with the applicable general plan or will cause a population increase that exceeds the AQMP's population target. Although the VCMC campus is not legally subject to the City of Ventura General Plan, the proposed medical facility uses are consistent with the "Existing Urban" General Plan land use designation. In addition, because the proposed project would not cause any population increase, it would not cause an exceedance of any population target. Thus, the proposed project would be considered consistent with the AQMP and cumulative impacts would be less than significant.

10. Comments and Responses to Comments on the DEIR

20.AB

As discussed in Response 20.AA, the analysis of cumulative traffic impacts was based upon currently proposed developments in the City of Ventura's pending projects list, as well as a 1.5 percent annual growth rate to account for regional traffic growth. Forecasts of cumulative traffic growth illustrate the effects of this background growth, in combination with traffic generated by the VCMC expansion. Regional air quality impacts were found to be less than significant in the May 1993 Initial Study. Consequently, the EIR air quality analysis focuses on localized effects associated with construction and the proposed parking structure. These types of localized effects would not contribute to impacts on regional air quality.

20.AC

Although short-term aesthetic impacts would be less than significant, implementation of Mitigation Measure AES-1 would further reduce impacts. Mitigation Measures AES-2 and AES-5 provide guidance in the development of landscaping and parking structure design plans that would help ensure consistency with City of Ventura Community Design Element policies. As discussed in Comment Letter 4 (Ventura County Air Pollution Control District), the VCMC already has a trip reduction plan on file with the APCD. Thus, Mitigation Measure AQ-9 will be deleted from the Final EIR.

As discussed in Section 5.3 of the EIR, the proposed project would not result in any significant transportation/circulation impacts. Nevertheless, because the project would incrementally contribute to future significant cumulative effects at three intersections, improvements that will be needed to mitigate cumulative impacts are identified. Although the VCMC is not currently required to participate in the City of Ventura Traffic Mitigation Fee Program to fund these improvements, it will contribute a reasonable share if requested to do so in the future.

In accordance with the requirements of AB 3180, a mitigation monitoring plan will be developed for all adopted mitigation measures in conjunction with preparation of the Final EIR.

20.AD

Geologic and seismic impacts were examined in detail in the May 1993 Initial Study and were found to be less than significant if the recommendations of the September 1992 geotechnical report and the January 1992 geological report for the Medical Examiner Facility and a subsequent geotechnical report for the proposed parking structure design were complied with. Although the report for the parking structure has not yet been prepared, preparation of this report would comply with the requirements of the Alquist-Priolo Special Studies Zones Act. With respect to CEQA, this project feature renders geologic/seismic impacts less than significant (please see Comment Letter 23, Development & Inspection Services, County of Ventura Public Works Agency).

10. Comments and Responses to Comments on the DEIR

20.AE

The results of the intersection capacity analysis indicate the traffic generated by the VCMC Expansion will not have a significant impact on the operating conditions of the seven key intersections evaluated. As mentioned in Section 5.3 of the EIR and the traffic study, the key intersections selected for evaluation were based on the City of San Buenaventura and the County of Ventura traffic impact criteria. Based on both the City's and the County's criteria/definition of significant impact, it was concluded that VCMC project traffic will not significantly or adversely impact the local transportation system. The project is forecast to only generate an additional 64 trips (24 inbound, 60 outbound) during the PM peak hour.

Although the project would not result in any significant traffic impacts, future traffic volumes, such as those associated with cumulative development, including those generated by the Buenaventura Mall Expansion, will cause significant cumulative impact. Three locations were identified in the VCMC traffic study as requiring some intersection improvements to address cumulative impacts. The funding for the improvements at these three locations (Mills/Main, U.S. 101/Main, and Mills/Telegraph) is expected to come from the Traffic Mitigation Fees collected from the projects that are approved by the City of San Buenaventura. As stated in response 20.AA above, the County will participate in the Traffic Mitigation Fee program if requested to do so. The traffic impact fee schedule adopted by the City and its associated policies is attached to the end of this response. If the Buenaventura Mall Expansion is approved, the improvements identified in the VCMC EIR are anticipated to implemented prior to occupation of Phase III of the mall expansion, which is anticipated by the Fall of 1996.

Please note that the improvements identified at the U.S. 101/Main intersection are consistent with the preliminary improvements identified by the City of San Buenaventura. According to the City's Annual Traffic Report (dated February 1992), the City will apply to Caltrans for funding and will supplement the cost of the improvements with the fees collected through the mitigation fee program.

See also response to 20.AC.

20.AF

The VCMC already has a trip reduction plan on file with the Ventura County Air Pollution Control District and will continue to implement its provisions. Please see Comment Letter 4, Ventura County Air Pollution Control District.

See also response to 20.AC.

20.AG

The VCMC EIR traffic study has identified intersection and roadway improvements that would be required to offset the impact of future traffic at

Application of Traffic Impact Fees

The schedule for traffic impact fees adopted by the City Council on May 9, 1988, is as provided in Resolution No. 88-44 and summarized in Table 3. The uses covered by each fee are listed in Table 5.

TABLE 3: TRAFFIC MITIGATION FEE SCHEDULE

LAND USE CATEGORY	UNIT	RATE
<u>Residential</u>		
Single Family	Dwelling Unit	\$5,245
Condominium	Dwelling Unit	4,145
Apartment	Dwelling Unit	3,145
Mobile Home	Dwelling Unit	2,385
RV	Dwelling Unit	1,190
<u>Commercial</u>		
General Retail & Commercial	1,000 sq.ft.	\$4,130
Office	1,000 sq.ft.	4,415
Motel/Hotel	Room	3,310
<u>Industrial</u>		
Business Park	1,000 sq.ft.	\$2,210
Manufacturing/Warehouse	1,000 sq.ft.	1,380
<u>Outdoor Activities</u>	Acres	\$ 740
<u>Hospital</u>		
Convalescent Hospital	Bed	\$ 355
General Hospital	Bed	3,240

The following policies have been established by the City Engineer with regard to the application of the Traffic Mitigation Fee provided in Resolution No. 88-44:

- a. The traffic mitigation fee for new second units or granny flats attached on adjacent to existing family homes will be the same fee as established for apartment units.
- b. The Housing Authority or other governmental entities are exempt from the traffic impact fees established by Resolution No. 88-44.
- c. Development destroyed by fire or flood, earthquakes or other natural disasters will not be charged a Traffic Mitigation Fee unless the new development replacing the destroyed development generates more peak hour traffic.
- d. A duplex is two dwelling units on one parcel of property. Each unit will be charged the full single-family dwelling fee.

10. Comments and Responses to Comments on the DEIR

the three impacted intersections (Mills/Main, U.S. 101/Main, and Mills/Telegraph) and return Levels of Service to an acceptable range. The recommended improvements are consistent with improvements identified by the City of San Buenaventura and are listed on page 5.3-22 of the EIR. As stated in response 20.AA above, the County will participate in the Traffic Mitigation Fee program if requested to do so.

20.AH

The EIR provides mitigation measures that would eliminate or substantially lessen identified significant environmental impacts, where feasible. Further, it includes measures designed to minimize impacts that were found to be less than significant. In all cases, the recommended measures are feasible and will become binding requirements if adopted as part of the EIR by County decision-makers.

Nevertheless, as stated in the EIR, impacts related to the size and height of the proposed ACC cannot be mitigated to a less than significant level outside of revising the proposed project (through reducing the building height or changing the building location). Thus, Section 7.0, Alternatives, examines two alternative siting scenarios for the ACC that would reduce or eliminate the significant effects of that building on the Agnus Drive residences immediately adjacent to the VCMC campus.

20.AI

No mitigation measures recommended in the EIR are delegated to the future. The commentor may be referring to the future preparation of a geotechnical report for the proposed parking structure. That report is not, however, an EIR mitigation measure. Rather, it is a feature of the proposed project (see Section 3.7 of the Project Description). Preparation of the report would render geologic/seismic effects less than significant (see Comment Letter 23).

20.AJ

As discussed in Responses 20.AD and 20.AI, compliance with the recommendations of the 1992 geotechnical report and geological report for the Medical Examiner Facility and a geotechnical report to be prepared for the proposed parking structure would render geologic/seismic impacts less than significant. Because such reports were incorporated into the project design during the preparation of the Initial Study, further evaluation of the seismic impacts in the EIR was not necessary. The County Public Works Agency, Development & Inspection Services Division, concurs with this finding, as discussed in Comment Letter 23.

20.AK

Although an increase in building area on the VCMC campus may accommodate more employees and patients in the future, the primary intent of the expansion is to relieve current overcrowding conditions on the campus. No significant expansion of services at the VCMC facility will be provided. As such, though the VCMC would respond to increases in demand for service

10. Comments and Responses to Comments on the DEIR

that may occur as the County's population grows, the proposed project would not in itself induce growth. Therefore, the project is not considered inherently growth-inducing.

20.AL

As stated in the EIR, the proposed expansion is primarily intended to relieve overcrowding conditions at the VCMC campus. Although the increased building area would accommodate additional demand if an increase in demand occurs and staffing were increased, it would not itself generate an increase in demand for medical services at the VCMC. Similarly, although an increase in demand for ancillary medical services may occur as population growth occurs in the County, the proposed project would not induce such a demand increase. Additionally, the areas surrounding the medical campus are already fully developed. Thus, no secondary growth-inducing impacts are anticipated to occur as a result of project implementation.

20.AM

The commentor's opinion that the Draft EIR should be revised and recirculated is noted. No response is necessary.

RECEIVED

309 Agnus Drive,
Ventura,
CA. 93003.

NOV 16 1993

ENGINEERING SERVICES

November 11th, 1993

21

Environmental Report Review Committee,
County of Ventura,
800 S. Victoria Avenue,
Ventura, CA. 93003.

Gentlemen,

309 Agnus Drive has been my home for the last twenty years and it has been the best place I have ever lived. We have had our ups and downs but nothing as permanently upsetting as what we are faced with now.

Everything was fine until about eight years ago when, without our previous knowledge, a generator was built right behind our garden wall. Since then we have suffered the noxious diesel fumes every time it is used. One of my neighbors moved out because of this and another sale was lost when the potential buyers found out what the generator was for. A

I am telling you about this because now we are told to expect a 340 space parking structure to be built behind the generator. B

How can we live with more pollution, lights, noise, loss of privacy and the loss of sea breezes which help to blow some of the diesel fumes away. The noxious gases will have no place to go and it will be hazardous to our physical health and unbearable to our mental state.

My husband and I have health problems and feel, if we are to be put in harms way, we would have no alternative but to sell our house. Another problem would be added as who would want to buy a house with a generator and a parking structure in their back yard. It would be like living in an industrial complex.

Our real estate values would plummet and even if we could sell we would not be able to afford a house like we have now on beautiful Agnus Drive. C

There is another reason for concern which is the amount of money being spent on the project. The health service plan which President Clinton is proposing could come into being any time and what would this mean for the County Hospital? D

My husband and I attended a meeting given by a doctor on President Clinton's health panel and he said the plan would allow patients to attend hospitals nearest to where they live. In that case the number of patients would drop dramatically and what would be the use of a huge parking structure then? An empty place for bad elements to move in?

We have voiced our concerns over and over again and are feeling the strain and worry of the aforesaid. We get the idea that the people on Agnus Drive are of no consequence and money will win out over human beings every time. E

Yours sincerely,

000562

Bortel

10. Comments and Responses to Comments on the DEIR

Commentor: Jean Bartel

Date: November 11, 1993

Response:

21.A Although the emergency generator is not part of the project being studied in the EIR, the lead agency is aware of the concerns voiced by local residents regarding air emissions from the generator. Measures to respond to concerns about the generator are currently being considered.

21.B As discussed in EIR Section 5.4.2.2.b and in Responses 16.B and 16.C, the carbon monoxide (CO) concentrations generated by the proposed parking structure would be substantially lower than the state and federal standards. Modelled CO levels at the closest Agnus Drive residence would be about 3.6 parts per million (ppm), as compared to the 20 ppm state standard. Because the standards are set to provide an adequate margin of safety to protect human health, no significant health impact is anticipated to occur as a result of air emissions from the proposed parking structure.

As discussed in EIR Section 5.2.2.2 and Response 16.A, the proposed parking structure would not be visible from many Agnus Drive residences. Thus, many residences would not be affected by lighting, nor would they experience any loss of privacy. Where the structure would be visible, the top of the structure would be as high in elevation as the Agnus Drive residences, not obstructing distant views. Thus, no loss of privacy would occur. Potential lighting effects would be mitigated by Measure AES-6, Parking Structure Lighting, which was added as part of Response 16.G.

The proposed parking structure would not have any significant noise effects, as discussed in EIR Section 5.5.2.2. Parking structure noise generally would not be heard above noise levels in the area. Although noise associated with tire squeal, automobile acceleration, and car alarms may occasionally be audible, such noises would not exceed City of Ventura standards. Thus, noise impacts are considered less than significant.

21.C The effect of project implementation on property values in the area is not known. Economic effects are beyond the scope of the EIR.

21.D Please see responses to 17.A and C.

21.E The commentor's concerns about the proposed project will be considered by the decision-makers as they weigh the EIR and the proposed project.

22

November 10, 1993

Mr. Alec T. Pringle, Project Manager
Engineering Services, Public Works Agency
County of Ventura
L# 1600, 800 S. Victoria Ave.
Ventura, CA 93009

RECEIVED

NOV 15 1993

ENGINEERING SERVICES

Re: Ventura County Medical Center Expansion Project

Dear Mr. Pringle:

This letter is from a number of homeowners on Grove Street, above the Medical Center - near where a number of pictures in the EIR were taken. We want to thank you for keeping us informed of the status of the project.

All of the demolition of old buildings and the new building will not affect us as much as those living on Agnus Street, but we are concerned about a number of problems.

After looking at the EIR, we feel that the "Alternative 2 Site Plan" is better than the "Proposed Site Plan".

A

In Plan 2 the Parking Structure would be more centrally located. It would also be less objectionable to the homeowners who back up to the Center by moving the noise, lights and blockage of view further west.

Anyone who has used a parking garage knows of the unique squealing of tires that results from all the sharp turns. Many of these homeowners have already complained of about the almost continuous generator noise and we on the hill can hear the lint extraction machinery at the laundry.

B

Moving the Parking Structure further west and south in Plan 2 also moves the building further away from the "Inferred Ventura Fault Line" - that appears to run through the middle of Juvenile Hall.

C

We hope these suggestions will be helpful and that you will continue to keep us informed of your plans.

Sincerely,

Bob Burns
Virginia Burns
3104 Grove St.

Edwin J. Waeber
Denise L. Ketter
3162 Grove St.

Craig Huntington
3124 Grove St.
Ventura, CA

cc: R. Wittenberg
A. Goulet
P. Durand

Ann Hayward
Gene Hayward
3048 Grove St.

Jackie Bach
David Bach
3142 Grove St. Vta, CA

000564

10. Comments and Responses to Comments on the DEIR

Commentor: 10 Grove Street Homeowners

Date: November 10, 1993

Response:

22.A The commentors' opinion that Alternative 2 is preferable to the proposed project is noted. This opinion will be considered by the decision-makers as they weigh the project.

22.B EIR Section 5.5.2.2.b recognizes the potential for periodic tire squeal noise from the proposed parking structure. Although such noise would occasionally be audible to some Agnus Drive residences, such noise would not cause an exceedance of any City noise threshold. Noise from the generator and laundry facility can currently be heard at some Agnus Drive residences. However, as existing facilities, they are not part of the project examined in the EIR, but noise from these sources are considered in the cumulative noise analysis.

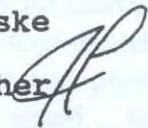
22.C No significant impacts related to the Ventura Fault are anticipated following implementation of any measures recommended in a geotechnical report to be prepared for the proposed parking structure. Nevertheless, it is true that the Alternative 2 parking structure location would be farther from the inferred fault line and would be largely outside the Alquist-Priolo zone.

23

COUNTY OF VENTURA
PUBLIC WORKS AGENCY
DEVELOPMENT & INSPECTION SERVICES
800 South Victoria Avenue
Ventura, CA 93009
(805) 654-2030

DATE: November 15, 1993

TO: Rich Guske

FROM: Jim Fisher 

SUBJECT: GEOLOGY & SOILS REVIEW: VCMC
Review of Consultants Responses

REFERENCE: WT98889

- Ref:
- 1) Victor M. Warren Mechanical Engineering (1993), letter re Medical Examiner Facility, project ref. 9214.AM-2, dated November 11.
 - 2) Leighton and Associates, Inc. (1993a), Review of Structural Foundation Plans for Medical Examiner Facility at Foothill Road and Hillmont Avenue, Ventura, Project No. 2920579-02, dated October 5.
 - 3) ----- (1993b), Review of Recommendations for Fault Trench Remediation at Proposed Medical Examiner Facility at Foothill Road and Hillmont Avenue, Project No. 2920579-02, dated November 10.
 - 4) Kruger Bensen Ziemer Architects, Inc. (1993), letter re VCMC Medical Examiner Facility, dated April 28.

I have completed a review of the above referenced responses and find that, taken together, they adequately addresses the remaining issues associated with mitigation of fault rupture potential at the site, as listed on my earlier memo dated 11/8/93. The operative design philosophy is that the structure should be designed to withstand collapse during a surface faulting event on the Ventura Fault. A

Based on the above findings, the impact of the geologic/seismic environment on the project is "Less Than Significant" with respect to CEQA.

END OF TEXT

000566

10. Comments and Responses to Comments on the DEIR

Commentor: Jim Fisher, Development & Inspection Services, County of Ventura Public Works Agency

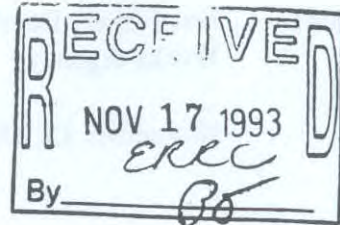
Date: November 15, 1993

Response:

23.A The commentor states that the EIR and EIR responses adequately address issues associated with fault rupture potential at the site and finds that the geologic/seismic impact of the project is less than significant. No response is necessary.

24

MARK R. PACHOWICZ
301 AGNUS DR.
VENTURA, CA. 93003
(805)988-8312



November 16, 1993

Environmental Report Review Committee
Hall of Administration
800 S. Victoria
Ventura, Ca. 93009

Dear Chair Bob Laughlin;

On November 16, 1993 I appeared before the Board of Supervisors on item number 24 on the Agenda. The Board was asked to enter into a contract with Rasmussen and Associates for the schematic design of the parking structure proposed in the Draft Environmental Impact Report ("DEIR") before you today. The Board approved this contract over my objection. I was denied the opportunity to respond to comments made by the director of the Public Works Agency by the Chair of the Board. I was instructed by the Chair of the Board to respond in writing. A

For the reasons stated below, I am of the opinion that the Board of Supervisors acted improperly. I also am of the opinion that the representations made by Mr. Goulet provide further evidence that the DEIR before you is defective and must be withdrawn. B

At the November 16, 1993, Board of Supervisors meeting Mr. Goulet stated that the parking structure is being proposed to comply with a demand made by the City of San Buenaventura. According to Mr. Goulet when the County first discussed building a new Mental Health Facility the City of San Buenaventura indicated that additional parking would be necessary.

Mr. Goulet and the Board of Supervisors discussed the Mental Health Facility as if it were a separate project from the proposed Ambulatory Care Clinic. ("ACC") They indicated that the building currently located at the corner of Hillmont and Loma Vista had to be demolished for safety reasons. I am of the opinion the record of the November 16, 1993 Board of Supervisors' meeting will reflect Mr. Goulet's attitude that the construction of the Mental Health Facility at its proposed location is a foregone conclusion. C

000568

.564

"An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." (County of Inyo v. City of Los Angeles, (1977) 71 Cal.App.3d 185) The Public Works Agency, through it's Director, is attempting to segregate the structures to be built on the VCMC campus. The project must be considered by you and the Board of Supervisors as a whole. In failing to present a consistent project description to the Board, to the public and to your committee the Public Works Agency has created a legally insufficient DEIR.

C
(Cont'd)

According to Mr. Goulet the County has moved forward with a parking structure to satisfy the City of San Buenaventura. The County of Ventura is not concerned with satisfying the policies or laws of the City of San Buenaventura. This is evident from the DEIR before you.

The DEIR states, "as a County project, the VCMC expansion is not subject to the City's architectural review process." (Page 5.2-9 of the DEIR) The DEIR also states, "the five-story ACC would, however, exceeds the 45 foot (three-story) height limitation for structures in the H zone. Consequently, this component of the project would be inconsistent with current City building height Policy. Although the County-owned project site is not subject to City land use policies..." (Page 5.1-7 of the DEIR)

D

To argue, as Mr. Goulet did to the Board of Supervisors, that any portion of this project is being done to accommodate the policies of the City of San Buenaventura is absurd. The County of Ventura has and will continue to totally disregard the policies and Ordinances of the City of San Buenaventura. If the contrary were true, no building on the VCMC campus would be higher than the 45 foot height limitation.

Mr. Goulet contends that there is a need for more parking on the VCMC campus. He holds this belief, even if the ACC is not built. His position is not supported by the facts. A parking study done by Linscott, Law and Greenspan, concluded that the "parking at the existing VCMC campus is essentially in balance, with parking demand equalling parking supply."

E

The Board of Supervisors were deprived of the true facts when they entered into a contract. That is unfortunate, since it is the responsibility of people such as Mr. Goulet to provide them with accurate information. The DEIR before you is defective for the reasons outlined in the letter I presented to you prior to the last hearing. Additionally, it is defective for the reasons outlined by my attorney, Roger Beers, in his letter to you dated November 15, 1993.

F

I submit that the comments made by Mr. Goulet on November 16, 1993, to the Board of Supervisors, are additional facts that support my contention that the project description contained in the DEIR is ever changing and therefore defective. I ask that you consider the parking study which I discussed above so that you may also conclude the DEIR is factual deficient and should not be approved in its current form. (1-2)

Respectfully,


Mark R. Pachowicz

cc: Roger Beers
Clerk of the Board of Supervisors
Alec Pringle

10. Comments and Responses to Comments on the DEIR

Commentor: Mark Pachowicz

Date: November 16, 1993

Response:

24.A The commentor noted that the Board of Supervisors approved the schematic design of the parking structure over his objection. No further response is necessary.

24.B The commentor's opinion is noted. No further response is necessary.

24.C It is well understood by the Director of the Public Works Agency that the 4 projects included within the EIR are, for the purposes of the EIR, inseparable from one another and must be considered together. The Director is also aware that the final location and disposition of any of the four projects is not a foregone conclusion, but a decision that only the Board of Supervisors can make.

24.D The desire of the City of Ventura that improved on-campus parking be provided if the County of Ventura were to proceed with construction of a Mental Health Inpatient Unit is consistent with the treatment of other City policies. While the County is not subject to City policy, ordinances or desires on County-owned land within the City boundaries, it is nevertheless the County's intention to comply with them to the extent possible. It is also the intention of the County to address in the EIR where compliance is not achieved and where a modification to existing City policy may be requested.

24.E The parking study shows that while onsite parking is essentially in balance, there is a need for a 10 percent circulation factor as well as a need to accommodate offsite demand on the medical campus. These requirements alone, without the ACC, are sufficient to require additional on-campus parking through a parking structure. Therefore, there is a need for additional on-campus parking with or without the ACC.

24.F Responses to previously submitted letters are available in this appendix. See responses to letters number 15 and 20.

The project description is neither changed nor defective based on the discussions at the November 16, 1993 Board of Supervisors' meeting. No additional response is necessary.

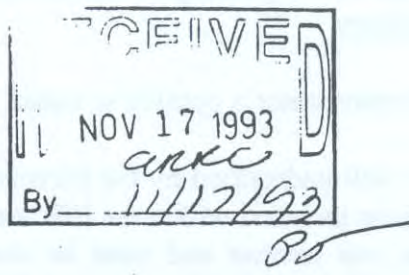


25



Dave Wallace

November 17, 1993



TO: EIR Committee
FROM: Dave Wallace
RE: VCMC proposed expansion

I am here to address my concerns for the way the county of Ventura is attempting to push through a plan for a massive expansion of the Ventura County Medical Center. This is being done, up until now, without allowing time for the studies necessary to show the true impact on the surrounding areas and the financial burden it will incur to our community. The county is attempting to circumvent the very processes put in place to safeguard against developments that have a negative impact on our community and it must be stopped now.

A

With changes in the medical profession being implemented at the federal level, this expansion could potentially be one of the largest financial catastrophes ever imposed on the City of Ventura. Health care is being changed drastically and this expansion will probably not be needed by the time this expansion is complete.

B

Without further studies of potential alternative plans, the tax payers of this community may be saddled with dept for many years when the money spent on this project is lost to causes that really need to be addressed, such as police and fire protection, education and drug awareness programs for our children. Stop this needless expansion now before it is too late.

C

Sincerely,

Dave Wallace

Dave Wallace

DW/gp

000572
568

RE/MAX Gold Coast REALTORS®
1300 Eastman Avenue, Suite 101

10. Comments and Responses to Comments on the DEIR

Commentor: Dave Wallace

Date: November 17, 1993

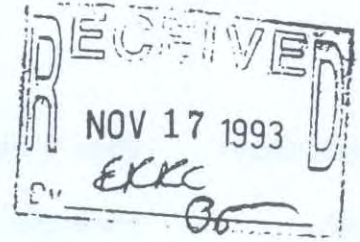
Response:

25.A The EIR addresses the environmental impact that the projects in this EIR will have on the surrounding area. The County is in compliance with CEQA by insuring that the necessary studies are completed and that the data is presented in the EIR in the timely manner required by CEQA. The financial impact of these projects, if any, is not a result of the physical changes which these projects cause, and therefore, is not within the scope of this EIR to evaluate.

25.B The commentor is assuming the nature and extent of federal legislation involving health care reform is known and drawing conclusions on the impact to the financial status of the City of Ventura. The comment and opinion are noted, but too speculative to comment on. No further response is necessary.

25.C The commentor's opinion that other programs should be funded before the health care projects is noted. No further response is necessary.

26



Members of the environmental review committee

I am Wayne Bartel 309 Agnus Drive Ventura Ca

I urge you to please reject the present environmental study for two reason. Firstly I believe its statements show that it will be environmentally damaging to the health of the neighborhood and secondly because I believe it is not complete.

My wife live behind the emergency generator and the Laundry Building. Now if you pass this we will be in direct line with the parking facility. I would like to give you a few quotes from the present report.

A

5.4-8 "parking garages result in high levels of carbon monoxide known as hot spots"

5.4-9 C.O. can be especially to people with heart disease and respiratory ailments"

5.5-1 Excessive noise can cause physical and psychological damage. Leq noise levels due to the boiler and the laundry measured east of the boiler is 54.7

B

5.5-6 " engine start ups ,accelerated tire squeal and car alarm noise is then added to the other noise and 73.1 may occasionally be audible.

My wife and I both have diagnosed circulatory problems and are on medications. How ironic that yesterday the county board of supervisors ordered a smoking ban for public places and then approved the schematic design of the parking structure behind my house. This was done before the E.I.R. was approved. My wife and I may have to consider moving. We then will have to face a large drop in our property value.

C

The city council in a letter to the Public Works, urged that alternative plans be considered to benefit the residents of Agnus Drive. Steve Chase signed this letter. Three other plans and a plan submitted by Mark Pachowitz were not considered. The Pachowitz plan and plan #4 were better. Hence the report is incomplete.

D

Ordinance 15 requires that our health and public welfare be protected. You have an obligation to consider our environmental health and welfare.

E

Yesterday We attended the County board of supervisors meeting. I was apalled. They spent hours discussing such things as the fees at camp comfort, the one dollar increase to park at Rincon beach, a letter of thanks to China, hiring a business man to promote the harbor and the airport and the possibilty of selling lottery tickets at the county building. Item 24 came up at 4PM. Mr Goulet warned of conterversey, remind of the June deadline to get the money from the state, and threatened a price increase if a decision were delayed. Comments in opposition were powerful but when one speaker wanted to add to his remarks he was denied. The measure passed in less than ten minutes. It appeared that they were sure that you would pass the EIR. If thats the case, why are we here? I urge you to reject this plan and ask for a better alternative. Thank you.

000574

10. Comments and Responses to Comments on the DEIR

Commentor: Wayne Bartel

Date: November 17, 1993

Response:

26.A On page 5.4-8, the EIR states:

"Traffic-congested intersection and parking garages have the potential to result in high levels of carbon monoxide, known as CO 'hot spots.'"
[Emphasis added]

Although such potential exists with parking structures, the CO modeling conducted for the parking structure proposed for the VCMC campus indicates that CO concentrations at adjacent land uses will remain substantially below the state CO standards. Thus, no significant impact to local air quality would occur. Also, please see Responses 16.B, 16.C and 16.D.

26.B Although excessive noise can cause physical and psychological damage, the proposed parking structure would not cause an exceedance of City noise standards at any Agnus Drive residences. Noise from the proposed structure generally would not be heard at any Agnus Drive residences over the current measured ambient noise levels of about 54.7 dBA Leq. Instantaneous noises such as engine start-ups and car alarms may occasionally be audible to some Agnus Drive residents but would not cause an exceedance of any noise threshold. Nevertheless, the EIR includes several mitigation measures to minimize the effects of these periodic noise occurrences.

26.C Please see the response to 21.C.

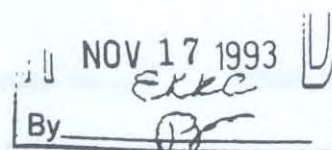
26.D Although it was not logistically feasible to study every alternative suggested by the public, the EIR examines four alternative site plans that were developed in response to concerns voiced by the local community at the April 1993 public hearings. Also, please see Response 15.M.

26.E As discussed in EIR Section 5.4, project implementation, with mitigation, would not cause any significant air quality or noise impacts. Thus, it would not have any significant effect on health or public welfare.

27

To the members of the review committee.

I am Jean Bartel - 309 Agnus Drive



I have many thoughts about the expansion of the County Medical Center but I want to tell you that for ourselves we are fighting for our life and breath.

We have been treated in the most heartless way by people who will not be living in the miserable conditions they are trying to condemn us to and telling us "so what".

A

The double standards are shocking. The county has barred cigarette smoking in their buildings but we are told diesel fumes and carbon monoxide are not harmful.

You have only to sit behind a diesel driven city bus to know how nauseating it is.

If someone lights up a cigarette outside the odor does not permeate the house but diesel fumes do even through closed doors and windows.

Add carbon monoxide to this from a parking structure and also noise and other aggravations and we will never be able to open our windows even on the hottest days of summer. What kind of existence is that?

There have been other plans submitted and we could have had an agreement on another location for the parking structure but the intention never was to consider the health and welfare of people on Agnus Drive.

B

We have had numerous meetings but all our arguments and pleas have fallen on deaf ears.

I never thought that at my age and state of health I would have to beg a health care agency - "please let me breathe". But I am begging you please don't do this to us.

000576

572

10. Comments and Responses to Comments on the DEIR

Commentor: Jean Bartel

Date: November 17, 1993

Response:

27.A The commentor's concerns about the effects of carbon monoxide from the proposed parking structure on Agnus Drive residents have been addressed in previous responses. Please see Responses 16.B, 16.C, 16.D, 20.N, and 26.A.

27.B The commentor's preference for an alternative location for the proposed parking structure is noted. This opinion will be considered by County decision-makers as they weigh the project and the EIR.

28

MARK R. PACHOWICZ
301 AGNUS DR
VENTURA CA. 93003
(805) 643-4549
(805) 988-8312

November 18, 1993

Environmental Review Committee
800 S. Victoria
Ventura, Ca. 93009

Re: The Expansion of the Ventura County Medical Center;

Dear Mr. Chairman:

On November 17, 1993, the Environmental Review Committee ("ERC") discussed the Draft Environmental Impact Report ("DEIR") covering VCMC. At the conclusion of the hearing, Mr. Backus directed several questions to Mr. Pringle. I would like to take this opportunity to address the issues raised by Mr. Backus.

Issue #1:

How will the County address the increased traffic problem created by this project?

In a letter dated September 30, 1993, a representative of the State Department of Transportation indicated that the County should finance the resolution of the traffic problem. The DEIR and Mr. Pringle's response attempt to pass the problem on to the City of San Buenaventura.

A

Mr. Pringle is of the opinion, as are the drafters of the DEIR, that the County is not responsible for the "poor operating conditions" the County will create at three nearby intersections. This is not an answer to a problem, this is a typical governmental response. It is an attempt to place responsibility for a problem at the front door of another governmental entity.

A

In response 1.A of Mr. Pringle's November 15, 1993, Memorandum he informs the ERC and the community that some of the VCMC campus may be leased to private companies in the future. This is the first time to my knowledge, that the County has expressed this type of land use plan. It is not expressed or considered elsewhere in the DEIR and for that reason the DEIR is deficient.

B

Issue #2:

Is this project over-built? Absolutely.

PARKING STRUCTURE

When the County first presented this project to the public the proposed parking structure was to be 5 stories. It has been reduced to three in the DEIR. Based on the facts, the County of Ventura can not even justify a three story parking structure.

Anyone remotely familiar with the VCMC campus understands that people who work in the Hospital Administration building located just off of Foothill will never park in a proposed parking structure. After all, there own lot is never more than 55% occupied. (Linscott, Law and Greenspan Report) People employed in the new Medical Examiner Facility which will be located at the corner of Hillmont and Foothill will never use the structure given

C

the geography of the campus.

The parking study conducted by Linscott, Law and Greenspan stated, "Briefly, we conclude that parking at the existing Ventura County Medical Center is essentially in balance." If the representation made by Mr. Pringle is true, that this project is not increasing the size of this facility, how can the County justify a net increase of 271 parking spaces? Even using the figures presented in the DEIR, an increase of 56 employees can not possible justify the need for an additional 271 parking places.

Ambulatory Care Clinic

Mr. Pringle indicated that the Mental Health Facility would be bigger than the existing facility, but the rest of the proposed project would be essentially the same. The authors of the DEIR refer to the ACC this way, "This component would involve the demolition or removal of twelve on-site facilities totalling 43,475 square feet and construction of a five story and two story, 105,000 square-foot clinic." (DEIR 3-8) Despite this increase of over 60,000 square feet, Mr. Pringle contends that a scaled down alternative does not have to be considered.

Assuming that all of the floors in the proposed ACC are equal in size, each floor would be 15,000 square-feet. (105,000 sq. ft. ÷ 7 floors = 15,000 sq. ft.) Cutting the proposed growth of the ACC in half would limit the ACC to an increase of 30,000 square-feet. This would reduce the size of the ACC by two floors. This is an alternative that must be considered.

Mental Health Facility

The proposed Mental Health Facility would add 15 beds. According to the facts contained in the DEIR this would mean 13.5 beds would be empty on the average day. This is over-building.

| E

Over-built

Reducing the size of this project by eliminating two stories of the ACC and doing away with "a net increase of 271 parking spaces" would dramatically reduce the environmental impacts of this project. Failing to consider a scaled down version of this project is unjustifiable. This Committee should reject this DEIR for this reason and demand a scaled down version as an alternative in the next DEIR.

Issue # 3:

Has the County been a good neighbor? No.

The emergency generator as it exists may be exempt from the guidelines set by the APCD, however, the generator should never have been constructed in the first place. Mr. Goulet filed with the County Clerk a Notice of Exemption on May, 28, 1985¹. This document permitted Mr. Goulet and his Department to circumvent the requirements of CEQA.

| F

The category exemption relied on by Mr. Goulet was Class 11, § 15311-Accessory Structures. This section "consists of construction, or placement of minor structures accessory to (appurtenant to) existing commercial, industrial or institutional

¹A copy of this document is attached to my first letter to the ERC as Exhibit "F" - "K".

facilities, including but not limited to: (a) On-premise signs; (b) Small parking lots; (c) Placement of seasonal or temporary use items such as lifeguard towers, mobile food units, portable restrooms, or similar items in generally the same locations from time to time in publicly owned parks, stadiums, or other facilities."

The generator at issue is not minor in size or importance. It is a rather large building that serves a very important function, it is designed to save lives in an emergency. The generator is not a sign, parking lot, lifeguard tower or portable restroom. After 8 years it is difficult to accept that it is a seasonal or temporary structure. Any attempt to "fit" the generator into the "including but not limited to" language of the statute would result in the inclusion of every structure since this emergency generator has absolutely nothing in common with the described items.

This is the type of treatment that the residents in this area have become accustomed to.

Conclusion

This project can not be justified based on the facts. Unfortunately, the DEIR does not present a scaled down version of the project as an alternative. The DEIR does not provide a detailed discussion on the proposed alternatives it rejects. There may be a way to construct this project and satisfy the environmental concerns of the citizens living around this institute for better health. This DEIR does not satisfy the requirements of CEQA and it must be rejected. I appreciate your consideration of

these comments.

Very Truly Yours,



Mark R. Pachowicz

ps: I applaud Mr. Guske's decision to finally recuse himself from these proceedings. However, I do not understand his "personal policy not to vote on any project proposed by the Public Works Agency" as he so eloquently stated for those in attendance at the most recent ERC hearing. I seem to recall that he voted against my request for a continuance at the first hearing. He then made a motion to continue the same hearing for two weeks to allow Mr. Pringle two weeks to respond to letters from myself and others. Mr. Guske then voted in favor of his own motion.

10. Comments and Responses to Comments on the DEIR

Commentor: Mark R. Pachowicz (Letter 28)

Date: November 18, 1993

Response:

- 28.A** This comment was addressed in a previous response. Please refer to Response 20.AE.
- 28.B** There are currently no plans to lease any portion of the VCMC campus to a private campus. Nevertheless, the EIR notes that, if any portion of the campus is leased to a private company in the future, that company would be required to contribute its fair share to the City of Ventura's Traffic Mitigation Fee Program.
- 28.C** This comment was addressed in a previous response. Please refer to Response 15.R.
- 28.D** The proposed ACC would increase the building area of the various clinics that it would house. However, the purpose of the ACC is to relieve current overcrowding conditions rather than to accommodate an increase in employment or services at the onsite clinics. Also, please refer to Response 20.Q.
- 28.E** Although the Mental Health Unit averaged 29.5 patients on a daily basis in 1992, the peak daily patient load was considerably higher (40 patients). The proposed Mental Health Unit expansion is designed to accommodate peak patient loads.
- Although reducing the size of the parking structure and ACC would reduce the proposed project's environmental impacts, evaluation of a "reduced size" alternative is not required under CEQA. Section 7.0 of the EIR examines four alternative site plan scenarios that would eliminate or reduce the project's significant environmental impacts. Also, please refer to Response 20.Q.
- 28.F** The emergency generator is an existing structure on the VCMC campus. Therefore, its effects are beyond the scope of this EIR. Nevertheless, as discussed in Responses 16.D and 18.A, consideration is currently being given as to how the concerns regarding noise and air quality impacts associated with the generator can be resolved.

29

November 22, 1993

Mr. Alec T. Pringle, Project Manager
Engineering Services, Public Works Agency
County of Ventura
L# 1600, 800 S. Victoria Ave.
Ventura, CA 93009

RECEIVED

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ENGINEERING SERVICES

Re: Ventura County Medical Center Expansion Project

Dear Mr. Pringle:

In our letter to you of November 10th, we five homeowners on Grove St. expressed our concern in some detail. Since few of our group can attend the meeting on the 14th, I'd like to summarize some of our thoughts.

We don't agree with Jere Robings that the Center should be abandoned. My wife and I have lived on Grove for over 20 years so have seen the Center age without much real upgrading. However, we agree with those who feel the changes can be down scaled, due to the budgetary problems. | A

We agree with the proposed new Medical Examiners Facility proposal - also that a number of smaller buildings, such as the kitchen should be upgraded. | B

We still favor Alternative 2 site plan with the more centrally located Parking Structure. A change to Plan 2 suggested by Bill Grey seems to help eliminate some of the fears of the Agnus residents - this is to switch locations of the proposed five-story Mental Health Unit, and the one-story Mental Health Inpatient Unit. This would move the huge bulk of the Ambulatory Unit to the corner of Hillmont and Loma Vista, from the back yard of Agnus residents. Moving the Ambulatory Unit and the Parking Structure further south and west should somewhat help the problem of the Fault Line. | C

It would be presumed that from all the complaints of the Generator and Lint Disposer, they would at least be sound-proofed in the redevelopment. | D

Unfortunately, after our first meeting at the Center some months ago, most of the Grove residents were left off the mailing list so missed the October 20 and Nov. 3 meetings. | E

Due to the general lack of concensus among not only the surrounding residents - along with some of the County agencies, we feel no real decisions should be made until 1994. | F

Sincerely,

Robert Burns + Virginia Burns
Robert & Virginia Burns

cc: R. Wittenberg
A. Goulet
P. Durand

000585

10. Comments and Responses to Comments on the DEIR

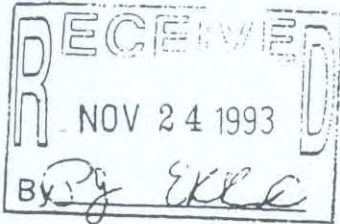
Commentor: Robert & Virginia Burns (Letter 29)

Date: November 22, 1993

Response:

- 29.A** The commentors' opinion that the proposed project can be downscaled is noted and will be considered by County decision-makers as they weigh the proposed project.
- 29.B** The commentors' opinion that a number of buildings on the VCMC campus should be upgraded is noted.
- 29.C** Please refer to Response 22.A.
- 29.D** The commentors' suggestion that the emergency generator and laundry building be sound-proofed is noted. Also, please refer to Response 21.A.
- 29.E** As discussed in Response 15.A, the lead agency has fully complied with all public noticing requirements, including providing public notice within a reasonable period of the preparation of the EIR and publication by the agency in a newspaper of general circulation. As a courtesy beyond CEQA's notification requirements, the lead agency sent a letter of information to area residents who had attended the public meetings.
- Notice of completion of the EIR was announced in the *Ventura County Star Free Press* on September 15 and 16. That notice also announced the opening of the public comment period for the EIR and the November 3 ERRC public hearing.
- In addition, the Public Works Agency mailed a notice of completion to the attendees of the April and May public meetings. A notice was mailed to the commentor on September 15, 1993.
- 29.F** The commentor's opinion that no decision should be made on the proposed project until 1994 is noted.

30



LAW OFFICES OF
J. JEFFREY HERMAN
ATTORNEY AT LAW
SUITE 600, FINANCIAL PLAZA TOWER
500 ESPLANADE DRIVE
OXNARD, CALIFORNIA 93030
AREA CODE (805) 983-2344

November 24, 1993

Environmental Review Board

Re: Environmental Review Board Meeting
November 24, 1993

Dear Gentilepersons:

This letter shall serve to advise you that the undersigned is unable to attend the board meeting currently scheduled for Wednesday, November 24, 1993 at 1:30 p.m. In lieu of my attendance at the meeting, this letter shall serve to set forth my views with respect to the Ventura County Medical Center project at issue.

I would like it stated for the record that the project under consideration has had a serious impact on my property located at 341~~1~~ Agnus Drive, Ventura, California. Said property was in escrow and subsequently fell out of escrow as a result of the buyer's concern over any future impact the project might have on the value of the property. Every potential buyer since has indicated the same concern.

Further, I have had to lower the asking price of my property by \$50,000.00, \$30,000.00 under the most recent appraisal of October, 1993.

As a consequence of the controversy and uncertainty surrounding the proposed expansion, I have no alternative but to take my property off the market at the present time.

Thank you for your consideration.

Very truly yours,

J. JEFFREY HERMAN, ESQ.

JJH:ecl

000587

10. Comments and Responses to Comments on the DEIR

Commentor: J. Jeffrey Herman, Esq. (Letter 30)

Date: November 24, 1993

Response:

30.A As discussed in Response 13.A, the focus of the EIR's analysis is to be on physical changes. Although economic information may be included in an EIR or other reports, economic effects are not to be treated as significant effects on the environment. Nevertheless, this comment will be considered by County decision-makers as they weigh the proposed project.

**APPENDIX 1.2
NOTICE OF PREPARATION/
INITIAL STUDY
NOP RESPONSES**

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NOTICE FOR PUBLIC AGENCIES

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT

To: _____
(Agency)

From: County of Ventura
Public Works Agency
800 S. Victoria Avenue
Ventura, CA 93009

(Address)

Contact: Alec T. Pringle
Project Manager
Engineering Services Division
(805) 654-2083

The County of Ventura will be the Lead Agency and will prepare an environmental impact report (EIR) for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is relevant to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The potential environmental effects of the project are contained in the Initial Study, a copy of which is included herein. It is also available at the Public Works Agency, Engineering Services Division. The potential impact issues identified in the Initial Study include: land use, air quality, noise, aesthetics, and transportation/circulation.

Due to time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to Alec Pringle at the address shown above. We will need the name of the contact person at your agency.

PROJECT TITLE: Ventura County Medical Center Expansion

PROJECT LOCATION: The project area encompasses acres entirely within the City of San Buenaventura. The site measures approximately 40 acres and is located at 3291 Loma Vista Road. It is bordered by Foothill Road on the north, Loma Vista Road on the south, eastern property lines of properties fronting the east side of Estrella Street on the west, and western property lines of properties fronting the west side of Agnus Drive on the east. The project area is bisected by Hillmont Avenue, which runs north to south between Foothill and Loma Vista Road.

PROJECT DESCRIPTION: The proposed project involves the redevelopment of the VCMC campus to provide improved medical and coroner facilities, as well as increased parking capacity. The project would entail the demolition or removal of 79,425 square feet of existing facilities and the construction of 157,558 square feet of new facilities. The net increase in building floor area on the campus would be 78,133 square feet. A 564-space parking structure would also be constructed while 186 existing surface spaces would be removed, thereby resulting in a net increase of 378 parking spaces.

Facilities to be demolished or removed would include the Women's Clinic, the Family Care Module, the Family Care Center, the former PSSA building, the Genetics trailer, a Health Department trailer, a childcare center, a storeroom, and the kitchen, conference, maintenance, and dishwashing facilities contained in the north wing of the Hospital.

Facilities that would be added or expanded as part of the proposed project are described below.

Mental Health In-Patient Unit. This component of the project would involve the construction of a one-story, 31,003 square-foot in-patient unit. The new Mental Health Unit would include three patient wings with a total capacity of 43 beds (a 15-bed expansion over the existing facility), a nurses' station, group rooms, a new occupational therapy room, and recreational areas.

Ambulatory Care Clinic. The Ambulatory Care Clinic would involve the demolition or removal of twelve on-site facilities totalling 43,475 square feet and construction of a four- or five-story, 118,755 square foot clinic. The net increase in floor area would therefore be 75,280 square feet. The Ambulatory Care Clinic is expected to be composed of various clinics, a lab, dietary facilities, and a cafeteria.

Medical Examiner Facility. This portion of the project would involve the construction of a new 7,800 square foot office/clinic building with associated site development. The project would house offices and associated facilities for three doctors, eight investigators, two secretaries, and an autopsy assistant, as well as an autopsy room, a morgue, a laboratory, storage spaces, and related public areas.

Parking Structure. The proposed project includes the addition of one five-level parking structure with 564 parking spaces. Construction of all components of the proposed project would result in the loss of 186 existing surface spaces; therefore, the net parking space increase would be 378 spaces.

Date: _____

Signature: _____

Alec T. Pringle
Project Manager
(805) 654-2083

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