

**RESOLUTION OF THE BOARD OF SUPERVISORS OF THE
COUNTY OF VENTURA APPROVING CHANGES TO THE
VENTURA COUNTY MEDICAL CENTER CONSOLIDATION
PROJECT; THE FINANCING AND CONSTRUCTION OF A
REPLACEMENT CLINIC BUILDING; AND A CONSULTING
SERVICES CONTRACT**

WHEREAS, the County of Ventura includes, among its component parts, the Ventura County Health Care Agency, whose mission is to provide crucially-needed, cost-effective, and high-quality health care services to the residents of Ventura County, including the indigent, the poor, and the mentally ill, regardless of race, creed, color, or economic status;

WHEREAS, to help serve its vital mission, the Ventura County Health Care Agency operates the Ventura County Medical Center (VCMC), which is a full-service, 223-bed acute care hospital as well as a number of satellite primary care clinics and campus-based primary and specialty clinics. VCMC through both its hospital and clinics provide a crucial health care "safety net" to those under-served residents of the County who experience barriers to health care due to any combination of economic, cultural, or lifestyle conditions. In fact, VCMC provides the overwhelming majority of the care received by the "safety net" population of Ventura County;

WHEREAS, to accomplish its legal mandate to provide health care to the indigent and its goals of providing access to healthcare for the under-served, VCMC offers a fully-integrated healthcare system including hospital, specialty and primary care clinic services;

WHEREAS, the number of patients served by VCMC has increased in recent years partly because of the ever-increasing number of persons lacking access to adequate health care, and certain crucial primary care and specialty services are located either in temporary trailers or in leased space off-campus and are not adequate to meet the increasing needs of its patient population;

WHEREAS, in 1994, recognizing the urgent need for VCMC to modernize and consolidate its operations to meet its growing demands, the Board of Supervisors of the County of Ventura approved the VCMC Consolidation Project ("the Project") and certified the Final Environmental Impact Report for the Project. The Project included several components of construction. Already completed components of the Project are construction of the Medical Examiner/Coroner's Office, the In-Patient Psychiatric Unit, the Emergency Generator Building, as well as associated building demolition, utilities relocation, and surface parking. Soon-to-be completed components of the Project include the VCMC medical laboratory, kitchen, and cafeteria. The next phase of the Project is the construction of a replacement clinic building;

WHEREAS, the proposed replacement clinic building will help control and potentially lessen the County's costs in providing health care to the needy by consolidating and integrating into one location several of VCMC's existing primary and specialty care clinics as well as the VCMC Family Practice Residency; by eliminating several lease payments currently made for off-campus clinics and by obviating the need to lease additional space to replace the temporary trailer currently housing the Family Care Clinic and the Residency; and by utilizing state funds under the SB 1732 Program, which will reimburse the County more than 50 percent of the total cost of the building;

WHEREAS, the proposed replacement clinic building will enhance the efficiency and timeliness of care for VCMC's patients and staff by integrating hospital, outpatient, and ancillary services; by allowing patients to access their physician as well as laboratory and imaging services all on one campus; by enabling physicians and specialists to provide urgent consultations in both the outpatient clinics and the hospital and affording them immediate access to laboratory, emergency room, pharmacy, and admission services;

WHEREAS, with the impending acquisition of Santa Paula Memorial Hospital as a campus of VCMC to provide desperately needed health care to the residents of the Santa Clara Valley, VCMC's system will serve even more outpatients;

WHEREAS, because of the pressing needs of VCMC, construction of a replacement clinic building is required to maintain the outstanding level of health care its patient population needs and deserves;

WHEREAS, the proposed replacement clinic building presented to us today is the physical equivalent of the original plan approved in 1994 with minor adjustments but is relocated from its original orientation to reduce the environmental impact of the Project and to more centrally locate the Project around parking assets;

WHEREAS, the proposed replacement clinic building design contract is needed to update the original 1994 design to current building code standards, furnishings, equipment, and materials; to modify the building to be a stand-alone structure; and to obtain consulting services for surface parking design, utilities relocation, building demolition, and related site work; and

WHEREAS, approval of the proposed demolition, construction, and financing is in the best interests of the County;

NOW, THEREFORE, THE BOARD OF SUPERVISORS OF THE COUNTY OF VENTURA RESOLVES AS FOLLOWS:

The Board: has reviewed and considered the attached Addendum together with the Final Environmental Impact Report (FEIR) and previous addenda and finds that no subsequent or supplemental Environmental Impact Report is required for the relocated

replacement clinic building ("Clinic") and reduced parking structure (and related demolition and surface parking) and their construction; approves the changes to the VCMC Consolidation Project for the Clinic, parking structure, and related demolition and surface parking, as described in the Addendum; approves the issuance, sale, and use of up to \$30 million from either Tax Exempt Commercial Paper or Certificates of Participation or both for the design, financing, preconstruction, and construction costs associated with the VCMC Consolidation Project as changed; subject to the limitation stated herein, authorizes the County Executive Officer and Director of the Public Works Agency to pursue and undertake all necessary actions required to finance, construct, and operate the VCMC Consolidation Project, as changed; approves the 1994 plans and specifications for the Clinic on file with the Clerk of the Board and authorizes and directs the Director of the Public Works Agency to update these plans and specifications to current applicable building codes, substituting similar materials, building equipment, or systems no longer manufactured, available, or optimally functional, and approve the updated plans and specifications for the Clinic as relocated; authorizes the Director of the Public Works Agency to conduct the bidding process for all contracts necessary and appropriate to accomplish the construction of the VCMC Consolidation Project, as changed, and to waive any minor irregularities in the bids and award the contract or contracts to the lowest responsive, responsible bidders, provided that prior to the award of the contract or contracts, financing is in place and the low bid or bids do not cumulatively exceed the Engineer's estimate of \$18,528,000 by more than 15%; and approves the consulting services contract for the Clinic on file with the Clerk of the Board and authorizes the Director of the Public Works Agency to sign the contract with Rasmussen and Associates of Ventura in the amount of \$1,367,180.

On motion of Supervisor Mihels, seconded by Supervisor Bennett, and duly carried, the foregoing resolution was passed and adopted on May 24, 2005.

Kathy I. Long
KATHY I. LONG
CHAIR, BOARD OF SUPERVISORS

ATTEST: JOHN F. JOHNSTON,
Clerk of the Board of Supervisors,
County of Ventura, State of California.



By: C. C. Christina Salamyela
Deputy Clerk of the Board

VCMC Consolidation Project FEIR Addendum of 05/24/05

Analysis of Whether a Subsequent or Supplemental Environmental Impact Report is Necessary for the Proposed Relocation and Construction of the Replacement Clinic Building and Reduced Parking Structure Components of the Approved VCMC Consolidation Project

I. The Approved Project and the Proposed Changes

For this analysis the benchmark for comparison of environmental impacts is the approved VCMC Consolidation Project (Alternative Site Plan 2) approved by the Board of Supervisors on January 4, 1994 as set forth in the Final Environmental Impact Report (FEIR), and subsequently modified by the County of Ventura Board of Supervisors (Board) on March 1, 1994 (Parking Structure Siting Modification), April 18, 1995 (Relocation of Emergency Generator System), November 26, 1997 (Interim Modular Family Care Center location) and March 13, 2001 (Project Component Modifications VCMC Medical Laboratory/ Kitchen).

The Board approved VCMC Consolidation Project includes a five-story, approximately 73,000 square foot replacement Clinic building referred to in the FEIR as the ambulatory care clinic (ACC). The proposed Clinic is now referred to as the replacement clinic building (Clinic) rather than, the Ambulatory Care Clinic or ACC to more accurately reflect the building's purpose and consistency with the County's Agreement with Community Memorial Hospital in 2001 to not build certain new specialty clinics on the VCMC campus. Physically, the Clinic and ACC are equivalents. The Board approved VCMC Consolidation Project also includes a two-story, approximately 32,000 square foot replacement medical laboratory, kitchen, cafeteria, dietary and lobby building, which with the former ACC totals approximately 105,000 square feet, and a parking structure. The parking structure is a three level reinforced concrete structure with each level approximately 52,800 square feet in area to accommodate approximately 427 cars. The approved project also includes a Medical Examiner and Mental Health In-Patient Unit buildings, a surface parking lot, demolition of 19 obsolete buildings totalling 81,888 square feet, pedestrian and vehicle access (including handicap access) and removal or relocation of existing utilities systems including a new emergency power generator system. The Medical Examiner, Mental Health In-Patient Unit, and Electrical Service Buildings (emergency power system) have been completed. All previously approved building demolition is completed. The replacement medical laboratory, kitchen, cafeteria, dietary and lobby building will be completed in 2005.

The proposed relocated and reduced project components to be compared against the benchmark, the VCMC Consolidation Project, are the relocated

replacement clinic building (Clinic) and a reduced size Parking Structure (PS). The proposed relocated Clinic project component also includes pedestrian and vehicle access to the relocated building, handicapped vehicle spaces required for the building, site improvements including demolition of several vacant or obsolete buildings, the conversion of these demolished building areas to surface parking, the temporary relocation of the interim Family Care Clinic (FCC), and the relocation of utilities necessary to support the relocated component. Attachment 1 shows the existing VCMC facilities including the new replacement medical laboratory, kitchen, and cafeteria building. Attachment 2 shows the approved locations of the Clinic and PS components. Attachment 3 shows the proposed relocated and reduced components analyzed in this Addendum. It should be noted that the proposed relocated Clinic will be within the footprint of the approved PS location (FEIR Alternative Site Plan 2 as amended by Addendum of March 1, 1994) and the existing interim modular FCC noted in the Addendum of November 26, 1997. As discussed in the analysis which follows, the interim FCC will be relocated and remain in service until completion of the Clinic at which time it will be dismantled. The size and capacity of the approved parking structure component will be reduced based on currently reduced parking requirements and allow space for the proposed relocated Clinic. The approved 3 level configuration would remain but the footprint and PS capacity reduced by approximately one half. Additionally as discussed in the analysis, the required parking spaces for the proposed project, lost by not constructing the approved Parking Structure at this time, are available in additional proposed surface parking in the vicinity of the relocated Clinic.

The above proposed relocated and reduced project components are virtually identical to the originally approved VCMC Consolidation Project with three exceptions. First, the proposed relocated Clinic would be located approximately 200 feet north and 160 feet west of the original location, it will be about 5 feet lower in elevation due to the topography at the revised location, and it will be detached from the two-story laboratory/kitchen/cafeteria building currently under construction. Secondly, an additional approximate 59,700 square feet of vacant or obsolete buildings will be demolished and those areas converted to surface parking spaces. Thirdly the PS would be reduced in size and capacity.

II. Analysis

The following analysis discusses the impact of the proposed relocated Clinic project component, the reduced PS, the temporary relocation of the interim FCC, the additional building demolition and surface parking construction, and related site work when compared to the approved project (Alternative Site Plan 2 as revised). The comparison includes review in the areas of Land Use, Aesthetics/Shadow/Light & Glare, Transportation and Circulation, Air Quality and Noise which are those areas that were considered in the originally approved FEIR to determine whether there is a substantial increase in severity of these impacts, as well as a review for new significant impacts. Quoted references to

the impacts of the approved FEIR VCMC Consolidation Project at Alternative Site Plan 2 are as compared to the originally proposed VCMC Consolidation project. The conclusions regarding Alternative Site Plan 2 versus the original project were accepted and approved by the Board of Supervisors. Therefore, these quoted references become the environmental impact benchmark for comparison to the proposed relocated Clinic component and the reduced PS component including the additional surface parking and building demolition.

This analysis also considers if there is any change in circumstances or any significant new information that shows: new significant impacts; substantial increase in the severity of the impacts previously identified in the FEIR; or new feasible mitigation measures or alternatives as required in Section 15162 of the State CEQA Guidelines.

A. Land Use

With respect to the proposed relocated Clinic (referred to in the FEIR as the ACC) and reduced PS, the primary element of Land Use that created impact, which was considered in the approved FEIR, was the height of the ACC and the PS as it might impede the Agnus Drive residents' view-shed and the closeness of the ACC building as it impacts view-shed.

Section 7.1.3.1 of the approved FEIR for Alternative Site Plan 2 says in part:

"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."

And

"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 view shed of Agnus Drive residences. Consequently, the potential for adverse land use impacts would decrease to some degree under this alternative."

The proposed relocated Clinic is virtually the same configuration as in the approved FEIR VCMC Consolidation Project at Alternative Site Plan 2 except that the Clinic is moved approximately 200 feet North and 160 feet

West and therefore further away from the Agnus Drive residences. The relocation of the proposed Clinic has slightly less impact on resident's view-shed over the originally approved project because it is farther away from these residences and the proposed relocated Clinic is at a site where the existing topography is about 5 feet lower than the approved location. All of these factors reduce the apparent height of the relocated Clinic with respect to these residences over the approved project.

The proposed relocated Clinic, moved farther away from Agnus Drive residents and more closely to the center of the VCMC campus, also further reduces the overall impact to view-shed. The impact is also lessened when compared to the approved project because the existing topography at the proposed relocated Clinic is lower than the approved site. The proposed relocated Clinic is also shielded more from residents' view by the existing Boiler/Laundry building than is provided under the approved project.

It is evident from the certified FEIR that the originally approved five-story ACC portion of the project has the primary impact on land use. Since the proposed relocated Clinic is virtually the same size and configuration as the original component, the land use impacts of the proposed relocated Clinic for height and view shed is less than and within the scope of the analysis of land use impacts in the FEIR.

The reduced size PS is within the same location as the originally approved PS as modified by the Board utilizing the addendum of March 1, 1994. The proposed reduced size PS therefore has less land use impact than the approved structure given an approximate one half-length reduction. The demolition of several vacant or obsolete buildings, and the construction of surface parking in these areas is a less intensive land use and is consistent with current land use and policy and has no land use impacts. The temporary relocation of the interim FCC adjacent to other one-story structures along Hillmont Avenue is consistent with current land use. The interim FCC however will be dismantled upon completion of the Clinic and the area restored to its current use as surface parking, resulting in no permanent change to current land use.

The land use impacts of the relocated Clinic, reduced PS, and related work is therefore less than those of the approved project.

B. Aesthetics / Shadow / Light and Glare

The FEIR considered the ACC as one of the primary sources of impacts in the areas of aesthetics/shadow/light and glare.

Section 7.1.3.2 says in part for the Ambulatory Care Clinic:

"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 relocated Clinic is moved approximately 200 feet North and 160 feet West of Agnus Drive residences. Additionally, the finish elevation of the Clinic will be approximately 5 feet lower than the elevation of the approved location analysed in the FEIR. It is therefore evident that the proposed relocated Clinic has slightly less impact on aesthetics and shadow given its further distance and lower elevation with respect to Agnus Drive residences, and slightly less impact from glare and light for the same reasons when compared to the originally approved location. The relocated Clinic is also partially hidden from view by the existing Boiler/Laundry building. Thus, the aesthetic, light, shadow and glare impacts of the relocated Clinic is slightly less than the approved location and is within the scope of the analysis of these impacts in the FEIR.

The demolition of vacant and obsolete buildings and the conversion of these areas to surface parking is an improvement to aesthetics and shadow at VCMC. The majority of these buildings were in operation 24 hours a day, 7 days a week with resultant vehicle traffic. The removal of these buildings is therefore also an improvement to light and glare impacts. The reduced PS with a smaller footprint in the approved location also has less impact on aesthetics, shadow, light and glare because of its reduced size. The proposed surface parking to be constructed is immediately adjacent to existing surface parking. The existing rising slope topography at the proposed surface parking locations on two of the four sides at each location and existing adjacent landscaping that will remain, blocks the majority of light and glare from vehicles. The majority of this parking is also to serve the Clinic which will operate only during normal business hours.

The temporarily relocated interim FCC (one story) would be adjacent to two story multifamily residences on Estrella Street (but separated by an existing block wall) and existing one story County Facilities, and would temporarily displace existing surface parking. The interim FCC would therefore have no impact on aesthetics and shadow based on its size and location. Because the interim FCC operates only during normal work hours and there is minimal exterior glazing, the impact from glare and light is considered less than the current use as surface parking which results in headlight glare at anytime.

The impact from light and glare for the proposed relocated and reduced components and related demolition and parking will therefore be at most the same but probably less than that in the approved project.

C. Transportation and Circulation

Section 7.1.3.3 of the FEIR discusses the impact of transportation and circulation for the approved FEIR VCMC Consolidation Project at Alternative Site Plan 2. It concluded that:

"the increase in vehicle trips generated by Alternative 2 would be the same as that generated by the proposed project "... "and impacts to both the on-site and local off-site circulation system would be identical to those associated with the proposed project."

The proposed relocated Clinic will generate the same vehicle trips to the Ventura County Medical Center and is the same capacity and scope as the approved VCMC Consolidation Project. With the reduction in PS size to accommodate the Clinic in the proposed location, the parking spaces required to meet the requirements of the proposed relocated Clinic will be partially provided by the removal of several vacant or obsolete buildings and those areas converted to temporary or permanent surface parking. This surface parking will add approximately 203 permanent spaces, which approximately matches reducing the PS component capacity (427) by about one half. Another 77 temporary spaces will be provided producing a net gain of 280 spaces on the VCMC campus to meet the needs of the proposed Clinic and anticipated parking shortages during and immediately after Clinic completion. These buildings to be demolished are either already vacant as a result of the Probation Agency relocating into new off-site facilities or behavioral health functions vacating buildings and moving to vacant on-site locations. In the case of the vacant Probation Agency buildings this has already reduced the net number of vehicle trips to VCMC when compared to the approved project and therefore reduced the total campus-parking deficit by approximately 66 spaces. This reduction in parking demand in conjunction with the conversion of vacant or obsolete buildings to surface parking and existing campus parking assets will meet the parking requirements of this proposed relocated Clinic. The proposed surface parking is also in the same general vicinity as was proposed for the parking structure and is in the same relative location to the proposed relocated Clinic as the approved project. The traffic circulation is therefore approximately the same as the proposed project. The temporarily relocated interim FCC will also improve internal circulation over the approved project by relocating the FCC facility away from the main parking circulation pattern until the Clinic is completed. Therefore, the on-site internal circulation pattern for the proposed relocated project is similar but slightly dispersed from the approved project. It is expected that

there would be slightly less or no change in internal circulation impact from the approved project.

With the relocation of some functions off the VCMC campus and subsequent reduction in vehicle trips the net effect is that, while the proposed relocated Clinic will generate the same transportation requirements, the overall impact on the VCMC campus is slightly less traffic than was expected by construction of the VCMC Consolidation Project. Therefore transportation and off-site circulation impacts will remain approximately the same or slightly less than analyzed and as approved in the VCMC Consolidation Project. Traffic and circulation impacts on-site of the proposed relocated Clinic are also therefore the same or slightly less than the approved project and within the scope of the analysis of transportation and circulation impacts in the FEIR.

D. Air Quality

Air quality considerations in Section 7.1.3.4 of the FEIR centered on vehicle emissions from the PS project component combined with the PS location in relationship to Agnus Drive residences and the prevailing westerly winds, and the amount of disturbed area due to construction of the ACC and the PS.

Under the approved Alternative Site Plan 2 the FEIR concluded that:

.. "overall fugitive dust emissions associated with construction activities would be somewhat greater",

"increase in vehicle air emissions associated with this alternative would be the same as that associated with implementation of the proposed project... " and,

"that the increase in CO concentrations would be less than significant under either this alternative or the proposed project. "

The FEIR went on to conclude because of increased dust emissions from a larger construction area, that

"overall air quality impacts associated with this alternative would be slightly greater than those of the proposed project. "

As was previously noted due to Probation Agency functions moving off campus, the number of vehicles, vehicle trips, and associated vehicle emissions will be less than the approved project. The use of surface parking at this time instead of a parking structure will also reduce air quality impacts to adjacent receptors as a result of increased spatial

emission dispersion. Since the proposed relocated Clinic component is essentially the same in size and scope, the Clinic would have the same air quality impacts as the approved project component of Alternative Site Plan 2 for the VCMC Consolidation Project, with one exception described below.

The proposed relocated Clinic structure will disturb the same area proposed to be disturbed under the approved VCMC Consolidation Project. However, the proposed additional surface parking will require the demolition of several vacant or obsolete buildings (Buildings 321, 322, 323, 324, 325, 326, 340, 342, and 343). This adds 59,700 SF of demolition over the approved project, bringing total demolition to about 141,600 SF. The original 82,000 SF of demolition has been completed. There would be therefore a temporary increase in the fugitive dust (PM10 emissions) and demolition vehicle air emissions (Nox emissions) during the duration of the additional demolition.

Likewise there is also an additional approximately 22,600 SF of soil that will be disturbed in order to construct the surface parking areas. This 22,600 SF also takes into account the proposed reduced size of the PS. Given that the approved project included disturbing approximately 66,800 SF of soil for the ACC and PS, this additional 22,600 SF will add to the impact on fugitive dust and vehicle air emissions over the approved project.

These increases to PM10 and Nox emissions are construction related and therefore transitory. Such emissions are analysed in the FEIR and are considered significant but mitigatable. These emissions are also not for a project element or improvement which was not previously identified in the FEIR (building demolition and surface parking are already in the FEIR) nor do they increase the severity of air quality impact. As noted in the FEIR, with the employment of the same mitigation measures already incorporated in to VCMC Consolidated Project for such PM10 and Nox emissions, the residual impact of the increased emissions is less than significant.

In further mitigation, because the proposed Clinic is approximately 160 feet farther away from residences, and farther upwind of the prevailing wind direction, the impact from fugitive dust and vehicle air emissions during construction for the Clinic will be slightly less, due to the increased distance from Agnus Drive and resultant increased dispersal and dissipation. Likewise the building demolition and the surface parking is similarly farther from the residences and farther upwind of the prevailing wind direction than building demolition and surface parking in the approved project. The proposed project changes also include the phasing of building demolition and surface parking construction in distinct stages to

further minimize the number of air quality related activities occurring at the same time.

Therefore, the proposed relocated Clinic will have the same impact due to dust and vehicle air emissions during construction activities. The additional building demolition and surfacing parking will add more dust and vehicle air emissions during construction activities. The reduced size PS will have slightly less impact due to dust and vehicle air emissions during construction. This is partially mitigated through dispersal and dissipation at the new ACC location and is further mitigated by also incorporating current APCD guidelines for minimizing fugitive dust and vehicle air emissions during construction as well as previously adopted mitigation measures into these project components. Thus, consistent with the FEIR, the construction related air quality impact remains less than significant.

The temporary relocation of the interim FCC has no impact on air quality other than the very short duration of vehicle air emissions associated with moving the FCC modular trailer components. The interim FCC trailers are on temporary foundations placed directly on the existing parking lot surface and therefore there is no soil disturbance.

Based on the above, the temporary air quality impacts from vehicle emissions from the additional demolition, interim FCC relocation, and surface parking construction activities are partially offset by the reduction in vehicle trips to the VCMC campus as a result of permanently relocating County probation functions off the campus. With respect to fugitive dust and vehicle emissions during demolition and surface parking construction, the impact of this component is significantly less than that analyzed for the approved project based upon the areas of demolition and soil disturbance proposed. Given the temporary nature, location away from adjacent neighborhoods and healthcare activities, and the phasing of those activities, as well as the incorporation into the project features of the FEIR approved mitigation measures and current APCD guidelines to minimize the impact, the impact from fugitive dust will be the same or less than the approved project. Therefore, the proposed relocated project component's air quality impacts are deemed to be the same or slightly less than the approved project component and are within the scope of the air quality impacts analysis in the FEIR.

E. Noise

In an analysis similar to that for Air Quality, the noise impacts of the proposed relocated Clinic are the same or slightly less than the approved VCMC Consolidation Project because the proposed Clinic component is essentially the same size and scope and use as the originally approved component. The reduced size PS has a subsequent decrease in noise

associated with construction as well as long-term use. Incremental temporary noise impacts associated with the building demolition, surface parking construction, and interim FCC relocation are the same type as previously identified in the FEIR (as not significant due to their temporary nature and the included construction design features), but are new sources and would generate additional noise over that of the approved project based on the additional square footage of areas to be demolished or constructed. However, the incremental temporary noise impacts associated with the additional construction period are maintained at a less than significant level by FEIR mitigation measures and design features already incorporated into the VCMC Consolidation Project. The relocated Clinic and the building demolition and surface parking construction are farther away from Agnus Drive residences, are also located more centrally on the VCMC campus, and will be accomplished in phases thus reducing noise in adjacent residential areas as well as for campus health care activities.

The FEIR in Section 7.1.3.5 concluded that under Alternative Site Plan 2:

"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"

The long term noise impact of the proposed relocated Clinic is the same or slightly less than the approved project because the proposed ACC component is similar in size to, will be built in a more central VCMC location than, and will provide for the same uses and capacity as, the originally approved component. Therefore, the proposed relocated Clinic noise impact is the same or slightly less than the approved project component and are within the scope of the noise impact analysis in the FEIR.

The noise impacts of the proposed additional building demolition (52,900 SF), surface parking construction, and temporary relocation of the interim FCC are in addition to the originally approved project based upon the square footage of building demolition and construction associated with surface parking in the approved project. These activities are however phased to minimize the noise associated with these activities and those of the relocated Clinic. As previously noted the more central location of the building demolition and surface parking construction further minimizes noise impacts to adjacent neighborhoods and healthcare activities. In addition the relocated Probation Agency functions off the VCMC campus reduce the number of vehicles on the campus and the associated traffic

and circulation noise. The reduced size PS also will reduce the duration of temporary noise sources during its construction.

Therefore while the temporary construction noise impacts associated with the proposed project changes are in addition to the approved project they are temporary in nature and are kept at less than significant levels by mitigation measures already incorporated into the approved FEIR and are within the scope of the noise impact analysis of the FEIR.

F. Cumulative Changes

This proposed modified project component and the changes addressed in the four addenda to the FEIR have been reviewed for any possible cumulative changes that may have occurred as a result. The proposed relocated project component, together with the prior project changes addressed in these addenda, still result in essentially the same project as approved in 1994 as the VCMC Consolidation Project with the exception of the reduced PS component, and the additional building demolition and surface parking noted. There are no cumulative changes that have occurred that would require substantial changes to the FEIR and would trigger a subsequent or supplemental EIR.

G. Change in Circumstances

The analysis of impacts of the proposed relocated Clinic, the reduced PS component and additional demolition and surface parking has been done within the context of those impacts identified in the FEIR, as well as with a review for new impacts. What must also be considered at this point in time is whether or not there have been any substantial changes in circumstances surrounding the project requiring changes in the FEIR. Five possible changes in circumstances are noted and are considered.

1. Expansion of the Buenaventura Mall has been completed. Section 5.3 of the FEIR, Transportation and Circulation, identified this proposed expansion and noted that at three key intersections, improvements were contemplated to offset the impact of future traffic and return Levels of Service to an acceptable range as a result of the expansion to the Buenaventura Mall. The FEIR also notes that for City intersections studied the VCMC project "*will have no significant impact on the operating conditions of the six key signalized intersections...*" and that "*project implementation would not in itself result in any significant traffic impacts...*". Therefore, the potential traffic impacts of the VCMC Consolidation Project was considered in light of the planned Buenaventura Mall expansion and the VCMC Consolidation Project was found to have no significant impact. Based on this, the Buenaventura Mall expansion

is not a substantial change in circumstances requiring major changes to the FEIR.

2. The FEIR in Section 5.1.1 titled Setting, notes that the mental health out-patient services and administrative functions were housed in the Bard Building in the northeast sector of the campus. The Bard Building was demolished in 1999 and the functions relocated into existing outpatient facilities on campus or, as in the case of administrative functions, located off the campus. This has reduced the daily vehicle trips to the VCMC campus. This change in circumstances creates no new impact to the proposed project, does not increase the severity of any impact identified in the FEIR, and by relocating these functions off the campus, lessens in some measure long term impacts attributable to land use, traffic, circulation, air quality and noise due to fewer vehicles and people on the campus than the approved project. Therefore, this is not a substantial change in circumstances requiring major changes to the FEIR.
3. The FEIR in Section 5.1.1 also discussed a juvenile correction complex in the northwestern portion of the campus. The FEIR did not contemplate the County's future decision to construct a Juvenile Justice Complex (JJC) at another location off the VCMC campus. The County JJC is now in operation. With the completion of the JJC, the existing juvenile correction facilities on the VCMC campus are vacant or are in the process of relocating off the VCMC campus. The County has not decided upon the future use of all of these facilities or whether or not all the facilities will be removed entirely. The need to meet some of the parking requirements for the proposed relocated ACC component does require the removal of buildings noted previously to allow construction of surface parking. The remaining vacated facilities will have a similar future use of the same or less capacity and intensity or the facilities will be completely removed. Therefore, there is no increase to the severity of any impact identified in the FEIR. There will be a lessening of FEIR impacts from land use, traffic, circulation, air quality and noise due to fewer vehicles, buildings, and people on the campus than contemplated in the approved project. Therefore, this is not a substantial change in circumstances requiring major revisions to the FEIR.
4. In the FEIR discussion of the community surrounding VCMC in Section 5.1.1.1, the land uses to the North and East were found to be primarily single-family residences and to the West single and multi-family residences. Immediately North of the VCMC campus along Foothill Road, the land use is primarily single-family

residences. There has been public discussion of the possibility of developing portions of the land in the foothills above Foothill Road. In November 2003, the citizens of Ventura overwhelmingly rejected a proposed specific development in the foothills above Foothill Road. Currently, there are no new specific development plans. Whether or not future development might create an environmental impact as to transportation or circulation in the vicinity is too uncertain at this time to predict. While this potential development was not contemplated in the VCMC Consolidation Project FEIR, it is considered too speculative to consider. This potential change in circumstances to the FEIR is noted; however, it is not so reasonably foreseeable and certain that further analysis can be accomplished, and is not considered a substantial change in circumstances.

5. The FEIR in Section 3.14 of the Initial Study reviews the geologic hazards of the project site. In the discussion regarding subsidence it is known that some soils onsite have a moderate shrink-swell characteristic such that the potential for soil subsidence does exist. The Initial Study goes on to note that project implementation would be in accordance with standard geotechnical practices and recommendations from geotechnical study. Building settlements in the older portions of the VCMC hospital building and most notably the orthopedic Clinic in the extreme Southeast corner of the campus have been recorded and monitored. The settlement and geotechnical data gathered do not reveal any change in the circumstances regarding the proposed project. The geotechnical data used for the proposed modified project component is consistent with recently gathered data and the proposed modified project component will be designed to update to current building codes and will be constructed in accordance with current geotechnical practices and recommendations. Thus, there is no substantial change in circumstances.

H. New Information

The process of developing the Change in Circumstances and New Information portions of the analysis for the proposed project addenda involved review of the County's standard Initial Study checklist. In reviewing each area of the checklist, the question was asked if any changed circumstances or new information was available. This review led to the five discussion items noted under Change in Circumstances. In this review, no information came to light that would be considered new information unknown at the time of the FEIR development. Therefore, there is no new information discovered for consideration in the proposed

relocated Clinic and reduced PS, and related demolition and surface parking which would require revisions to the FEIR.

I. Summary of Analysis:

In summary there are no new significant impacts, and no substantial increase in the severity of impacts, no change in circumstances, no significant new information, and no substantial project change associated with the proposed changes to the approved VCMC Consolidation Project.

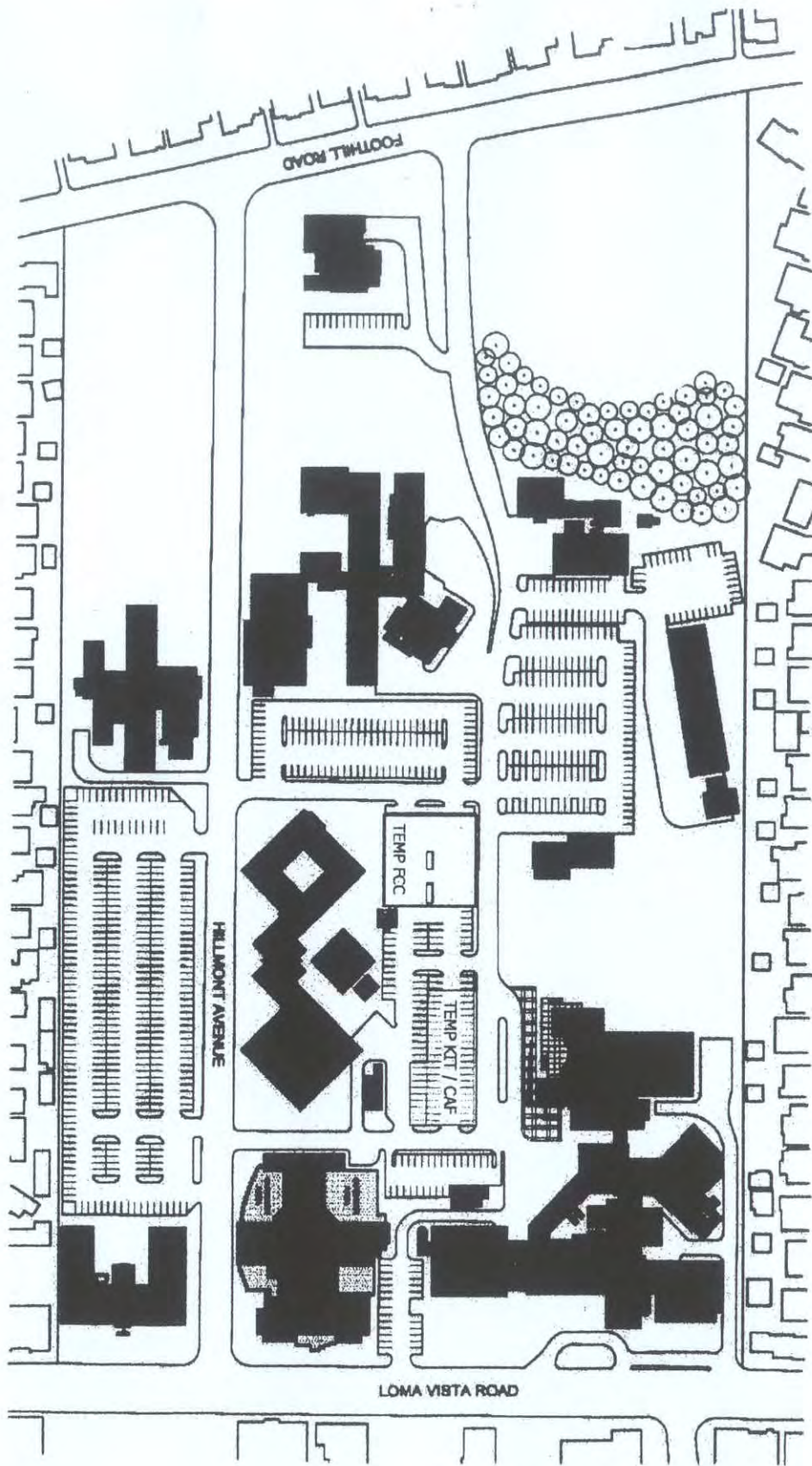
The proposed relocated and reduced project components are essentially the same facilities and for the same use as the previously approved project components. Based on these factors and the analysis and the findings in sections A through H above, the project changes are not substantial and there are no new impacts or substantial increase in severity of the impacts previously identified in the FEIR. The physical features of the area surrounding the VCMC are essentially the same now as in 1994 when the FEIR was approved except as noted in Section G. The physical features of the VCMC campus have changed since 1994 in that the building demolition, utility relocations, the emergency generator system, and the kitchen/lab building described in the approved FEIR and previous addenda have been completed or will be completed shortly. The Medical Examiner and Mental Health In-Patient Unit included in the approved FEIR have also been constructed. The discussion under Section G, Changes in Circumstances, did not reveal any changes in circumstances which will increase the severity of impacts already considered and analysed in the FEIR or can reasonably be speculated to cause a new impact. There is no significant new information concerning impacts, mitigation measures or alternatives in the FEIR that has arisen or been discovered.

III. Findings

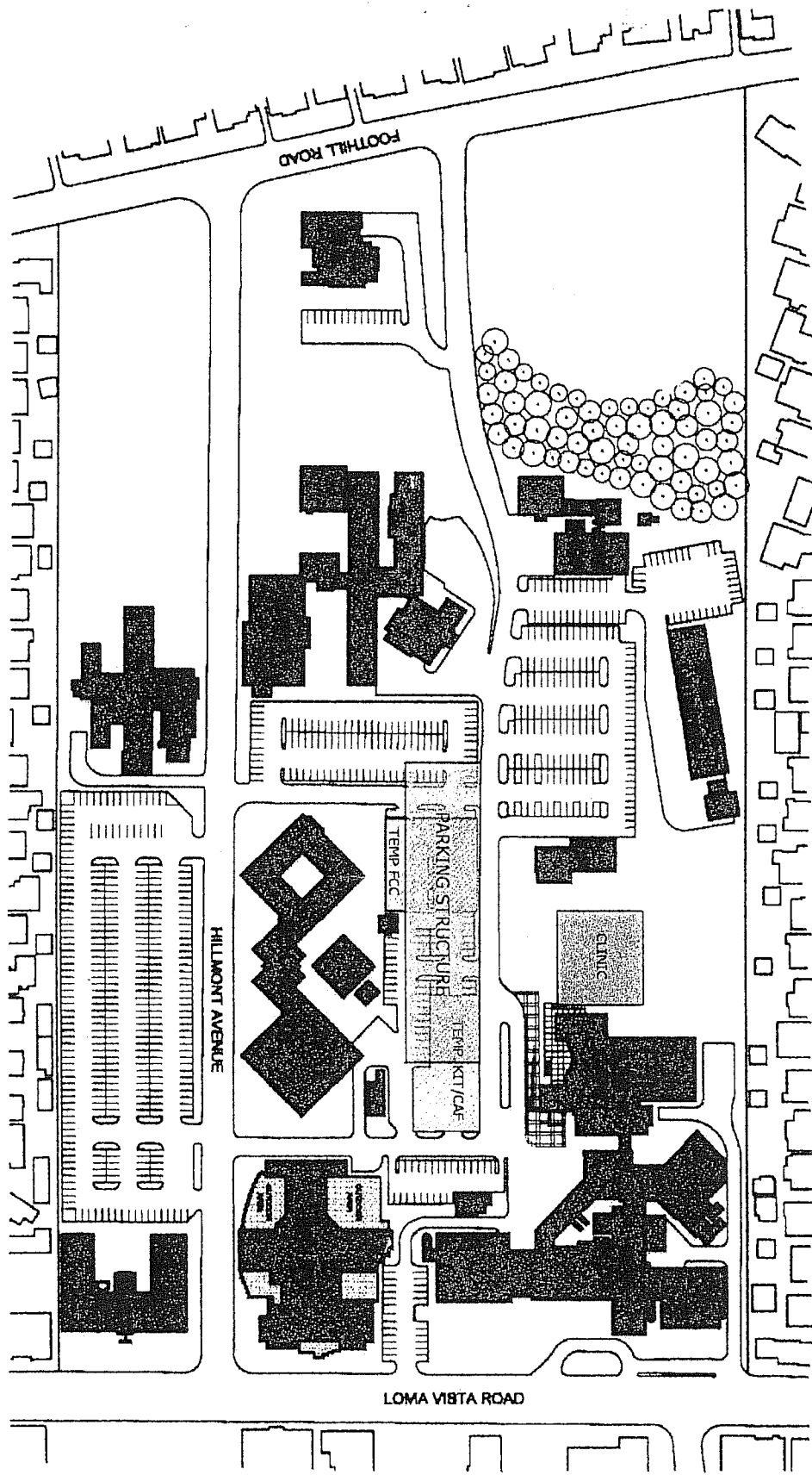
Based on the above analysis, the following findings and conclusions are made regarding the environmental impacts of the proposed project changes when compared to the approved VCMC Consolidation Project:

- A. The land use impact for the proposed relocated or reduced project components is less than the approved project.
- B. The aesthetic/shadow/light and glare impacts of the proposed relocated or reduced project components are less than the approved project.
- C. Transportation and circulation impacts for the proposed relocated or reduced project components are the same or less than the approved project.

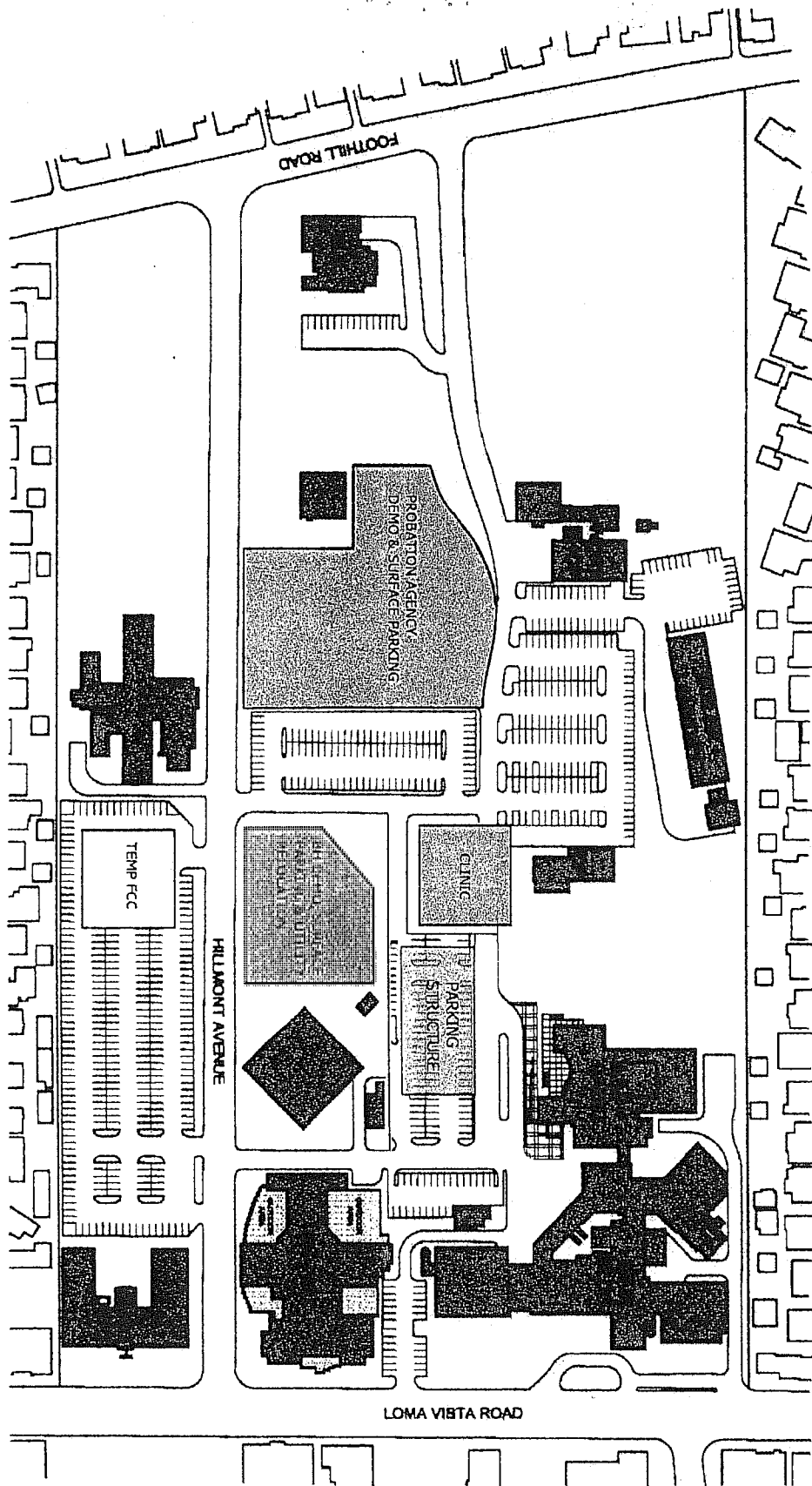
- D. Air quality impacts for the proposed relocated or reduced project components are the same or slightly less than the approved project.
- E. Noise impacts for the proposed relocated or reduced project components are the same or slightly less than the approved project.
- F. The severity of the five impact areas addressed above for the approved project remain the same or are less for the proposed project changes by virtue of the original project approval with mitigation measures, the mitigation monitoring program, and the features of the project.
- G. The proposed project changes will not create any new significant environmental effect not previously discussed in the FEIR and adds no environmental impact beyond those impacts studied in the FEIR, thereby causing no substantial increase in the severity of previously identified impacts.
- H. The proposed project changes are included within and are not a substantial change to the approved project, and there are no changes in circumstances or any new significant information of substantial importance to the project, which would require changes to the FEIR.
- I. No subsequent or supplemental EIR is required to address the proposed project changes and an addendum is sufficient to incorporate minor changes that do not raise important new issues about the significant effects on the environment into the FEIR.



Attachment 1
Existing Facilities



Attachment 2
Board / County Approved
Components



**Attachment 3
Proposed Relocated
& Reduced Components**

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