



FINAL ENVIRONMENTAL IMPACT REPORT

LOMA LINDA UNIVERSITY HEALTH MASTER PLAN PROJECT

SCH No.: 2013051043

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Final EIR
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1.0 INTRODUCTION

1.1 OVERVIEW OF THE PROJECT AND ENVIRONMENTAL REVIEW PROCESS

In September 2013, Loma Linda University Adventist Health Sciences Center (LLUAHSC) dba Loma Linda University Health (LLUH) (“Applicant” or “Project Proponent”) submitted an application to the City of Loma Linda Community Development Department (City) for a Precise Plan of Design (PPD) to construct and operate a multi-phased development including new facilities and improvements to the existing campus facilities in order to accommodate existing demands in the services provided, and to meet regulatory requirements. A Conditional Use Permit (CUP) would be required if construction of a Southern California Edison (SCE) substation at the Elmer Digneo City Park is selected as the preferred option for the substation.

Proposed facilities and improvements associated with the Master Plan include: 1) a seven-story, approximately 250,000 square-foot, 760-space patient and visitor parking structure; 2) a 13-story (approximately 215 feet in height), approximately 732,000 square-foot hospital with 464 beds to replace a portion of the seismically-noncompliant existing hospital, and 80 parking spaces; 3) an approximate 34,000 square-foot new or retrofitted utility plant; 4) an approximate 14,000 square-foot Southern California Edison (SCE) on-site or off-site electrical substation; 5) a two-story, approximately 9,000 square-foot addition to the existing dental school; 6) a four-story approximately 90,000 square-foot research building; and 7) tenant improvements and reuse of the vacated portions of the existing hospital. Improvements and upgrades at the campus would also include potential expansion of utility lines or other infrastructure updates within streets that occur within the Project Site (i.e., Anderson Street, Taylor Drive, Loma Linda Drive, etc.).

The approximate 23.8-acre Project Site is centrally located in the City of Loma. Specifically, the Project Site is located on the north side of Barton Road, on the west side of Anderson Street, on the east side of Campus Street, and generally south of the Union Pacific Railroad (UPRR), with a small portion (Elmer Digneo City Park) extending north of the UPRR. The geographic coordinate location of the Project Site is 34.049347 north latitude and -117.264011 west longitude.

The Project Site includes the existing LLUH and its entireties (i.e., Medical Center, University, Dental School, etc.) and also includes Elmer Digneo City Park located to the north of the LLUH that may be used for siting a SCE substation to serve the campus. The park site is located east of Anderson Street and north of the UPRR. The main Medical Center campus is located north of Barton Road between Anderson Street and Campus Street. According to the City of Loma Linda General Plan Land Use Map, the existing hospital is designated Healthcare, and the remaining campus is designated Institutional. The Elmer Digneo City Park is designated Special Planning Area B, and is zoned Institutional (I).

A complete description of the Project is provided in Chapter 3.0 of the Draft Environmental Impact Report (Draft EIR) prepared and circulated for public review and comment between September 13, 2013 and October 28, 2013 (State Clearinghouse Number 2013051043).

This Final Environmental Impact Report (Final EIR) has been prepared to describe the disposition of environmental issues raised in the comments received on the proposed Project's Draft EIR. Evaluating the potential impacts of the Project on the environment and responding to comments is an essential part of the environmental review process required under CEQA (California Public Resources Code (PRC) § 21000 et seq.). This Final EIR has been completed in accordance with CEQA and the CEQA Guidelines (Title 14 of Section 15132 of the California Code of Regulations (CCR) (14 CCR § 15132)).

1.2 FINAL EIR REQUIREMENTS

This Final EIR provides responses to comments received on the Draft EIR. Section 15132 of the CEQA Guidelines requires that the Final EIR consist of:

- The Draft EIR or a revision of the draft;
- Comments and recommendations received on the Draft EIR either verbatim or in summary;
- A list of persons, organizations, and public agencies commenting on the Draft EIR;
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the Lead Agency.

This Final EIR for the Project has been prepared to provide responses to comments received on the Draft EIR and is to be used in conjunction with, rather than in place of, the Draft EIR. Therefore, the information in this Final EIR, which incorporates the Draft EIR, fulfills state and County CEQA requirements for a complete EIR.

Chapter 3.0 of this Final EIR provides revisions for clarification or amplification of information already in the record. In no instances do the errata provide substantial new information or indicate a new impact or increase in the severity of an impact identified in the Draft EIR.

1.3 USE OF THE EIR IN THE DECISION-MAKING PROCESS

The EIR is an informational document designed to inform the public of the significant environmental effects of a project, identify possible ways to minimize or mitigate the significant effects, and describe reasonable alternatives to the project.

The City will use the EIR, together with economic, social, and technical information, to decide whether to approve the discretionary entitlements being requested. The City has made this Final EIR available prior to hearings on Project approval or denial to provide an opportunity for agency and public review of the complete EIR before decisions are made. In addition, the City provided each of the commenting agencies a CD copy of this Final EIR at least 10 days before the first Planning Commission hearing on the Proposed Project.

This EIR (the Draft EIR as revised by the Final EIR) reviews the environmental consequences of the Project, as described in Chapter 4 of the Draft EIR. The City will use the EIR, along with other information, in its consideration of the application.

Upon review of the Final EIR, and before rendering decisions on the discretionary actions, the City must certify that:

- The Final EIR has been completed in compliance with CEQA,
- The Final EIR was presented to the decision-making body of the Lead Agency, and
- The information was reviewed and considered before approving the project.

1.4 SIGNIFICANT AND UNAVOIDABLE IMPACTS

The analysis determined that with the exception of impacts from Greenhouse Gases, all other impacts associated with the Proposed Project would be reduced to a less than significant level after mitigation. Impacts from Greenhouse Gas Emissions associated with the power plant portion of the utility plant remain adverse and unavoidable even after implementation of mitigation measures. Therefore, a statement of overriding considerations is required for the Proposed Project.

2.0 CEQA PUBLIC REVIEW PROCESS

2.1 PURPOSES OF PUBLIC REVIEW

CEQA Guidelines Section 15201 states:

“Public participation is an essential part of the CEQA process. Each public agency should include provisions in its CEQA procedures for wide public involvement, formal and informal, consistent with its existing activities and procedures, in order to receive and evaluate public reactions to environmental issues related to the agency’s activities. Such procedures should include, whenever possible, making environmental information available in electronic format on the Internet, on a web site maintained or utilized by the public agency.”

The City of Loma Linda (City) has invited public input during the EIR preparation process, including providing opportunities to review and comment during the scoping process and during Draft EIR circulation, as discussed further in Section 2.2.

CEQA (California Public Resources Code (PRC) § 21082.2(b)) explains that, “Statements in an environmental impact report and comments concerning an environmental impact report shall not be determinative of whether the project may have a significant effect on the environment.” According to CEQA, it is the responsibility of the lead agency decision makers to “determine whether a project may have a significant effect on the environment based on substantial evidence in the record.” Substantial evidence is defined as facts, fact-related reasonable assumptions, and expert opinion. “Substantial evidence” does not include arguments, speculation, unsubstantiated opinion or narrative, clearly erroneous evidence, or socioeconomic impacts not related to the physical environment (PRC § 21080(e), 21082.2(a), 21082.2(c), and CEQA Guidelines § 15384).

2.2 PUBLIC REVIEW PERIOD AND NOTIFICATIONS

In accordance with both the specific requirements and the intent of CEQA, the environmental review process for the Project has included substantial opportunities for public and agency review and comment on the environmental evaluations. The public review process for the Project EIR has included the following opportunities:

- A Notice of Preparation (NOP) was issued by the City to surrounding property owners and local organization on March 11, 2013, and then to state agencies on May 17, 2013, for a period of 30 days.
- On March 21, 2013, the City of Loma Linda, hosted a Public Scoping Meeting at the Coleman Pavilion Basement located at 11175 Campus Street in Loma Linda to discuss the scope of the Draft EIR being prepared for the Project.
- A Notice of Completion for the Draft EIR was filed with the State of California Clearinghouse on September 11, 2013, and a Notice of Availability was posted on the City’s Internet website and sent to 40 property owners within a 500-foot radius of the

Project Site, and organizations and agencies that previously expressed interest in the Project.

- The Draft EIR was circulated for review and comment between September 13, 2013, and October 28, 2012.
- The Draft EIR was made available for public review at the County of San Bernardino Public Library Loma Linda Branch, the City of Loma Linda Community Development Department, and on the City's Internet website.
- Copies of the Draft EIR were provided, upon request, to responsible, trustee, and other federal, state, and local agencies expected or known to have expertise or interest in the resources that the Project may affect.
- Copies of the Draft EIR or notices of the Draft EIR's availability were sent to organizations and individuals with special expertise on environmental impacts and/or who had previously expressed an interest in this Project or other activities.

This Final EIR has been provided to commenting agencies, organizations, and individuals either in hard copy or electronic form on CD prior to Project hearings before City decision makers. Notice of the availability of this Final EIR was also provided to agencies, organizations, and the public who have previously expressed an interest in the Project but did not comment on the Draft EIR.

2.3 SUMMARY OF PUBLIC INPUT

One comment letter from a public agency was received on the NOP and seven (7) comment letter (six (6) agencies and one (1) individual) were received on the Draft EIR. No comments were received during the Draft EIR Public Scoping Meeting held on March 11, 2013. Each comment letter is included in Appendix A of this Final EIR. A list of the agencies, and individual who submitted comments is provided in the table of contents of this Final EIR.

Comments addressed a range of issues, including several on the content and analysis of the Draft EIR. Comments addressing the adequacy of the EIR or issues relevant to the environmental review included the following topics:

- Compliance with Native American tribal consultation pursuant to SB 18
- Potential impacts to archaeological deposits or isolated finds
- Alternatives analysis content

Many of the comments submitted were general and asked questions already answered in the Draft EIR evaluations. Other commenters asked for clarification on points addressed in the environmental evaluations.

Comments received from one individual indicated disagreement with the Draft EIR conclusions. Where specific points of disagreement were expressed by the commenter, detailed responses

have been prepared in this document. However, reviewers of the same data may arrive at different conclusions; therefore, the opinions of each commenter are hereby acknowledged.

2.4 APPROACH TO RESPONSES

The Draft EIR was circulated to numerous agencies having jurisdiction over natural resources that could be affected by the Project or having expertise or interest in environmental resources. In addition, interested organizations and individuals received the documents or were notified of their availability. Six agencies and one individual submitted specific comments or opinions based on review of the Draft EIR. The majority of comments submitted were general and expressed concern regarding cultural and Native American resources, traffic concerns, drainage changes, energy concerns, water supply and greenhouse gas emission. The majority of these comments requested clarification on specific points addressed, while some provided suggestions on further minimizing the potential impacts from greenhouse gases. Comments from the agencies and individual are responded to in Section 4.0 of this Final EIR.

3.0 DRAFT EIR ERRATA

3.1 OVERVIEW

In reviewing and responding to comments on the Draft EIR, the City of Loma Linda (City) determined that minor revisions to portions of the Draft EIR text were warranted to provide clarification or amplification of certain information. CEQA Guidelines Section 15088 provides that where the response to comments makes important changes in the information contained in the text of the Draft EIR, the Lead Agency should either revise the text in the body of the EIR or include marginal notes showing that the information is revised in the response to comments.

Section 3.2 of this Final EIR provides revisions to the Draft EIR as deemed necessary based on consideration of issues raised in comments on the Draft EIR. Revisions to the Draft EIR text are shown as *errata*, consisting of an excerpt of the Draft EIR text with changes represented with added text shown in underline (example) and deleted text show in strikethrough (~~example~~).

The City Council recognizes the Final EIR incorporates updated legal and technical information obtained and produced after the Draft EIR was completed, and that the EIR contains additions, clarifications and modifications related to that new information. The information is provided in the Errata and identified through interlineation of the Draft EIR for clarity, and was provided to the Planning Commission and to the public in the Planning Department staff report.

The foregoing new information provided in the Final EIR does not include any changes to the Project or the environmental setting in which the Project is undertaken and no additional discretionary approvals are required as a result of the changes. Rather, the new information merely clarifies, amplifies or makes insignificant modifications reflected in the Section 6.0 (Alternatives) of the Draft EIR.

The City Council independently has reviewed and considered the Final EIR and all of its information. The Final EIR does not add significant new information to the Draft EIR that would require recirculation of the EIR under CEQA. The new information added to the EIR does not involve a new significant environmental impact, a substantial increase in the severity of an environmental impact, or a feasible mitigation measure or alternative considerably different from others previously analyzed that the Project Applicant declines to adopt that would clearly lessen the significant environmental impacts of the Project. No information indicates that the Draft EIR was inadequate or conclusory or that the public was deprived of a meaningful opportunity to review and comment on the Draft EIR. Thus, recirculation of the EIR is not required.

The City Council finds that the changes and modifications made to the EIR after the Draft EIR was circulated for public review and comment do not individually or collectively constitute significant new information within the meaning of Public Resources Code § 21092.1 or CEQA Guidelines § 15088.5.

Severability Provision/Findings

If any term, provision, or portion of these Findings or the application of these Findings to a particular situation is held by a court of competent jurisdiction to be invalid, void or unenforceable, the remaining provisions of these Findings, or their application to other actions, shall continue in full force and effect unless amended or modified by the City.

None of the changes provided in Section 3.2 of this Final EIR contain significant new information. The inclusion of this information in the Final EIR does not deprive the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the Project or a feasible way to mitigate or avoid such an effect. The Final EIR does not identify any new significant impacts or substantial increases in the severity of any environmental effects identified in the Draft EIR. All of the information added to the Final EIR merely clarifies, amplifies, or makes insignificant modifications in the Draft EIR. Therefore, recirculation of the Draft EIR is not required (see CEQA Guidelines § 15088.5).

3.2 ERRATA

This section contains errata to the Draft EIR. The erratum is preceded by a brief explanation of the purpose of the change to the Draft EIR text.

ERRATA

3.2.1 Errata to Draft EIR Section 4.3 Cultural, Section 4.3.4.3 Issues Determined to Have Potentially Significant Impacts (page 4.3-9)

Explanation

Based on comments received on the Draft EIR, it was determined that additional clarification to Mitigation Measure CR-1 with regards to the City notifying local tribes of construction commencement was required. The addition of new text, does not affect the impact analysis or the severity of impacts identified in the Draft EIR. This errata does not add significant new information to the EIR and does not require recirculation of the Draft EIR (see CEQA Guidelines § 15088.5).

The following text revisions were made to Mitigation Measure CR-1 at the end of page 4.3-9.

Mitigation Measures

Mitigation Measure CR-1:

The Project Proponent (LLUH) shall have an archaeological monitor on-site during any proposed demolition and initial ground altering activities to ensure adequate and accurate recordation of the demolition and to document any potentially significant archaeological discoveries. The archeological monitor shall oversee excavations within the younger alluvial

deposits. The extent and duration of any required monitoring shall be dependent upon the various task-related schedules and at the discretion of the City of Loma Linda.

The City shall notify local tribes of when construction would begin on the Project, so that tribes have the opportunity to have a monitor present if they so desire.

This errata does not add significant new information to the EIR and does not require recirculation of the Draft EIR (see CEQA Guidelines § 15088.5).

3.2.2 Errata to Draft EIR Section 4.6 Hydrology, Section 4.6.3 Applicable Policies, Plans and Regulations (page 4.6-7)

Explanation

Based on comments received on the Draft EIR, it was determined that since the Project Site occurs within the Study Area Boundary of the “Comprehensive Storm Drain Plan #4 (SCDP #4), additional information should be provided in the EIR. The addition of new text, does not affect the impact analysis or the severity of impacts identified in the Draft EIR. This errata does not add significant new information to the EIR and does not require recirculation of the Draft EIR (see CEQA Guidelines § 15088.5).

The following additional text was added to Section 4.6.3 Applicable Policies, Plans and Regulations on page 4.6-7.

San Bernardino County Comprehensive Storm Drain Plan #4

The Comprehensive Storm Drain Plan #4 (CSDP #4) is an advanced planning tool most recently updated in February 2013 by the San Bernardino County Flood Control District. The update was prepared to reflect changes in the larger drainage basin due to urbanization within the Study Boundary Area and to investigate District Facilities to ensure they are in conformance with the most recent hydrologic methodology. In addition, the update looked at ways to reduce flooding in the downstream area of Redlands by identifying possible upstream detention facilities. The CSDP #4 update reached several conclusions including the feasibility of certain detention facilities and stating that any additional analysis should be done on a Facility-by-Facility basis in the future.

This errata does not add significant new information to the EIR and does not require recirculation of the Draft EIR (see CEQA Guidelines § 15088.5).

3.2.3 Errata to Draft EIR Section 4.6 Hydrology, Section 4.6.4.2 Issues Identified to Have No Impact or a Less Than Significant Impact (page 4.6-13)

Explanation

Based on comments received on the Draft EIR, it was determined that since the Project Site occurs within the Study Area Boundary of the “Comprehensive Storm Drain Plan #4 (SCDP #4), additional information should be provided in the EIR. The addition of new text, does not affect

the impact analysis or the severity of impacts identified in the Draft EIR. This errata does not add significant new information to the EIR and does not require recirculation of the Draft EIR (see CEQA Guidelines § 15088.5).

The following text revisions were made to the second paragraph of page 4.6-13.

The Proposed Project would be designed to include pervious surfaces greater than or equal to the existing condition to maintain consistency with the pre-developed condition. Runoff from the developed condition would also be conveyed to both public and private on-site storm drain facilities consistent with the existing condition. Storm water would be collected in the onsite private and public storm drain systems. The Proposed Project may include changes to the existing storm drain facilities (i.e. existing private storm drains in conflict with the proposed buildings would be relocated or additional private storm drain as required to support the proposed buildings would be incorporated into the project design). The campus lies within the Study Area Boundary of the CSDP #4 update and is a relatively small portion of the overall Study Boundary Area. Recognizing that the Proposed Project does not anticipate a diversion of storm runoff, an increase in peak storm runoff flows (with the possible exception of the Elmer Digneo City Park area), or a change in the location of storm water discharge points, it would be expected to create no additional impact on the existing downstream facilities. However, if an increase in the peak runoff flow rate is identified during the more detailed future construction drawing and permit phase, any potential increase would be required by the City to be mitigated through the use of on-site retention facilities. This condition of approval would be consistent with the goal of the District to reduce the amount of runoff in the downstream area of Redlands. Public drainage facilities are not anticipated to be changed significantly and would be approved by the City Engineer prior to the issuance of grading permits.

This errata does not add significant new information to the EIR and does not require recirculation of the Draft EIR (see CEQA Guidelines § 15088.5).

3.2.4 Errata to Draft EIR Section 4.7 Greenhouse Gases/Climate Change, Section 4.7.4.3 Issues Determined to Have Potentially Significant Impacts (page 4.7-14)

Explanation

Based on comments received on the Draft EIR, it was determined that additional mitigation measures should be included in the EIR. The addition of new mitigation, does not affect the impact analysis nor does it reduce the impact any further as identified in the Draft EIR. This errata does not add significant new information to the EIR and does not require recirculation of the Draft EIR (see CEQA Guidelines § 15088.5).

The following text revisions were made to Mitigation Measure GHG-1 on page 4.7-14.

Mitigation Measure GHG-1:

The Applicant shall implement the following applicable GHG Mitigations-Measures as listed in Table 4.7-3 which will be reviewed and imposed by the City as conditions of approval at the time of building permit issuance.

Category	Measure No.
Energy	
Building Energy Use	
Buildings Exceed Title 24 Building Envelope Energy Efficiency Standards By 10%	BE-1
Install Energy Efficient Appliances	BE-4
Install Energy Efficient Boilers	BE-5
Lighting	
Install Higher Efficacy Public Street and Area Lighting	LE-1
Alternative Energy Generation	
Establish Onsite Renewable Energy Systems-Solar Power	AE-2
Transportation	
Land Use/Location	
Increase Diversity of Urban and Suburban Development (Mixed Use)	LUT-3
Increase Destination Accessibility	LUT-4
Increase Transit Accessibility	LUT-5
Neighborhood/Site Enhancements	
Provide Pedestrian Network Improvements	SDT-1
<u>Implement a Neighborhood Electric Vehicle (NEV) Network</u>	<u>SDT-3</u>
<u>Provide Electric Vehicle Parking/charging stations</u>	<u>SDT-8</u>
Parking Policy/Pricing	
Limit Parking Supply	PDT-1
Commute Trip Reduction Programs	
Implement Commute Trip Reduction Program - Voluntary	TRT-1
Implement Commute Trip Reduction Program – Required	
Implementation/Monitoring	TRT-2
Provide Ride-Sharing Programs	TRT-3
Implement Subsidized or Discounted Transit Program	TRT-4
Encourage Telecommuting and Alternative Work Schedules	TRT-6
Implement Commute Trip Reduction Marketing	TRT-7
Provide Employer-Sponsored Vanpool/Shuttle	TRT-11
<u>Implement Bike-Sharing/Alternative Transportation Programs</u>	<u>TRT-12</u>
Operational	
<u>Require the use of 2010 compliant diesel delivery trucks</u>	<u>NA</u>
<u>Require use of electric lawn mowers and leaf blowers</u>	<u>NA</u>
<u>Require use of electric or alternatively fueled sweepers and HEPA filters</u>	<u>NA</u>
<u>Require the use of electric or alternative fueled maintenance vehicles</u>	<u>NA</u>
Water	
Water Use	
Install Low-Flow Water Fixtures	WUW-1
Adopt a Water Conservation Strategy	WUW-2
Design Water-Efficient Landscapes	WUW-3
Use Water-Efficient Landscapes	WUW-4
Reduce Turf in Landscapes and Lawns	WUW-5

Source: These measures are included in CalEEMod model and are largely based on the California Air Pollution Control Officers Association (CAPCOA) “Quantifying GHG Mitigation Measures”

1: City of Loma Linda Energy Action Plan Goal.

3.2.5 Errata to Draft EIR Section 6.4 Evaluation of Alternatives, 6.4.1 No Project Alternative (page 6-5)

Explanation

Based on comments received on the Draft EIR, it was determined that the evaluation of land use impacts within Section 6.0 Alternatives was not provided. Since no impacts were reported for Land Use, only the discussion of impacts with potential significance is expanded to examine the potential for mitigation and comparison to the Proposed Project impacts, as is the purpose of the Alternatives section. The addition of new text, do not affect the impact analysis or the severity of impacts identified in the Draft EIR. This errata does not add significant new information to the EIR and does not require recirculation of the Draft EIR (see CEQA Guidelines § 15088.5).

The following text revisions were made to the first paragraph of “6.4.1 No Project Alternative” on page 6-5.

The No Project Alternative independently and in comparison to the Proposed Project is addressed briefly for each of the environmental impact topics that have potentially significant impacts consistent with the impact analysis conducted in Chapter 4.0 of this Program EIR. The discussion of impacts with potential significance is expanded to examine the potential for mitigation and comparison to the Proposed Project impacts.

This errata does not add significant new information to the EIR and does not require recirculation of the Draft EIR (see CEQA Guidelines § 15088.5).

END ERRATA

4.0 COMMENTS AND RESPONSES

This chapter of the Final EIR provides specific responses to each issue raised in comment letters received on the Draft EIR during the public review period.

The public comment period for the Draft EIR began September 13, 2013 and ended October 28, 2013. A total of seven (7) comment letters were received. These are listed in Table 4-1 and are identified by a number. Individual comments within each letter are identified with a unique numeric indicator. For example the comment letter from the County of San Bernardino Department of Public Works, is Letter 2. The letter contains two comments identified as comments 2-1 through 2-2; responses are respectively numbered Response 2-1 and Response 2-2. All comment letters are provided in their original form in Appendix A, Comment Letters Received on the Draft EIR.

**Table 4-1
Comment Letters Received on the Draft Environmental Impact Report**

Letter	Name	Date on Letter
1	State of California, Native American Heritage Commission	September 17, 2013
2	County of San Bernardino Department of Public Works	October 16, 2013
3	State of California Department of Transportation	October 18, 2013
4	Southern California Edison Company	October 28, 2013
5	Citizens Advocating Rational Development	October 28, 2013
6	South Coast Air Quality Management District	October 31, 2013
7	California State Clearinghouse	October 29, 2013

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Letter No.1**Native American Heritage Commission, September 17, 2013**

Comment 1-1: Comment requests that a record search should be completed to determine if part or all of the area of project effect (APE) has been previously surveyed for cultural places. It is recommended that known cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report.

Response 1-1: A cultural resource assessment of the Project Site was completed on September 5, 2013 and included a records search. The report concluded that no formal reporting of Native American resources has occurred to date, no resources were discovered on the Project Site, and the archaeological sensitivity of the project area is considered to be low. However, in the event that any buried archaeological materials are encountered during construction, Mitigation Measures CR-1 and CR-2 address actions to be taken to reduce any potential cultural/archeological impacts to a less than significant level (see Draft EIR, pp 4.3-9).

Comment 1-2: Comment recommends the cooperation with NAHC in the event that an additional archeological inventory survey is required and a professional report detailing findings is generated. The final report is to be immediately submitted to the planning department. All information regarding site locations, Native American human remains and funerary objects are to be filed in a confidential addendum not available to the public.

Response 1-2: In accordance with Mitigation Measure CR-2 (see Draft EIR, pp 4.3-9), the State Historic Preservation Officer and Native American tribal contacts would be notified within 48 hours of the discovery of any archaeological artifacts. Appropriate actions requested at the time, including coordination with the NAHC if a subsequent inventory survey is conducted, shall be followed through by the City and Project Proponent. In accordance within California Government Code Section 6254.10, a separate confidential addendum, not available for public disclosure, will include site locations including the location of any discovered Native American human remains.

Comment 1-3: Comment provides a list of contact information to help determine if proposed development will impinge on cultural resources.

Response 1-3: As part of the Cultural Resource Investigation prepared for the Project, McKenna et al., contacted the Native American Heritage Commission and local Native American representatives to inquire into the relative sensitivity for the project area to yield potentially significant prehistoric, proto-historic, or historic remains associated with the known Native American presence in the general area. To date, no responses to those early consultation efforts have been received.

Comment 1-4: Comment states that lead agencies should include in a mitigation plan provisions for accidentally discovered archaeological resources, pursuant to California Health and Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) 15064.5(f). A certified archaeologist and culturally affiliated Native American with knowledge or cultural resources should monitor all ground disturbing activities. California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans. Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code 5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in the location other than a dedicated cemetery.

Response 1-4: In the event that any archaeological materials are encountered during construction, Mitigation Measures CR-1 and CR-2 address actions to be taken in order to reduce any potential cultural/archeological impacts to a less than significant level (see Draft EIR, pp 4.3-9). Mitigation Measure CR-1 requires an archaeological and paleontological monitor on-site during initial ground altering activities to insure adequate and accurate recordation of any potentially significant archaeological or paleontological discoveries. In accordance with Mitigation Measure CR-2 (see Draft EIR, pp 4.3-9), the State Historic Preservation Officer and Native American tribal contacts would be notified within 48 hours of the discovery of any archaeological artifacts including any human remains.

An amendment to Mitigation Measure CR-1 will require the City to notify local tribes of when construction would begin on the Project, so that tribes have the opportunity to have a monitor present if they so desire (see errata below):

Mitigation Measure CR-1:

The Project Proponent (LLUH) shall have an archaeological monitor on-site during any proposed demolition and initial ground altering activities to ensure adequate and accurate recordation of the demolition and to document any potentially significant archaeological discoveries. The archeological monitor shall oversee excavations within the younger alluvial deposits. The extent and duration of any required monitoring shall be dependent upon the various task-related schedules and at the discretion of the City of Loma Linda.

The City shall notify local tribes of when construction would begin on the Project, so that tribes have the opportunity to have a monitor present if they so desire.

Letter No.2**County of San Bernardino Department of Public Works, October 16, 2013**

Comment 2-1: Since changes may affect drainage, refer to “Comprehensive Storm Drain Plan #4” (CSDP #4), which is available at the offices of San Bernardino County Flood Control District. The document is a planning tool used to direct surface runoff toward local drainage facilities. It is requested that proposed development be in accordance with CSDP #4.

Response 2-1: The Comprehensive Storm Drain Plan #4 (CSDP #4) is an advanced planning tool. It was recently updated (February 2013) by the San Bernardino County Flood Control District to reflect changes in the larger drainage basin due to urbanization within the Study Boundary Area and to investigate District Facilities to ensure they are in conformance with the most recent hydrologic methodology. In addition, the update looked at ways to reduce flooding in the downstream area of Redlands by identifying possible upstream detention facilities. The CSDP #4 update reached several conclusions including the feasibility of certain detention facilities and stating that any additional analysis should be done on a Facility-by-Facility basis in the future.

The LLUMC campus lies within the Study Area Boundary of the CSDP #4 update (see sheet 6 of 15 of the exhibits at the end of the study). The campus is a relatively small portion of the overall Study Boundary Area. Recognizing that the proposed LLUMC project does not anticipate a diversion of storm runoff, an increase in peak storm runoff flows (with the possible exception of the City Park area), or a change in the location of storm water discharge points, it would be expected to create no additional impact on the existing downstream facilities. However, if an increase in the peak runoff flow rate is identified during the more detailed future construction drawing and permit phase, any potential increase would be required by the City to be mitigated through the use of on-site retention facilities. This condition of approval would be consistent with the goal of the District to reduce the amount of runoff in the downstream area of Redlands.

An errata to Draft EIR Sections 4.6-3 and 4.6.4.2 has been prepared to incorporate this information.

Comment 2-2: If any construction is required within District right-of-way, a permit must be obtained from the Department’s Permits/Operations Support Division, and such construction must conform to District Standards.

Response 2-2: Based on the March 22, 2013 title report for the campus, there are a number of existing easements in favor of the County of San Bernardino (water pipelines, highway and road, and drainage and flows) located on the campus with most of them being located on the northern portion of the project site. If proposed

work within any of these existing easements is identified during the future preparation of more detailed construction drawings and permits, the Applicant will coordinate with the Department of Public Works (Permits/Operations Support Division) to obtain the appropriate approval(s) and permit(s) as would be required for any easements or rights-of-way. It is understood that the proposed work shall conform to the District's standards unless approved otherwise by the District.

Letter No.3**State of California Department of Transportation, October 18, 2013**

Comment 3-1: The Tippecanoe Ave/Anderson Street and I-10 interchange should be analyzed.

Response 3-1:

The traffic analysis accounts for the redistribution of traffic volumes with the construction of the new parking areas and access points. It should be noted that the central utility plant and electrical substation are accounted for with the areawide growth projection of future traffic volumes. The dental school addition and research building trip generation are based upon the number of students at the Loma Linda University and no new students have been proposed. The tenant improvements and adaptive reuse of the vacated portions of the existing hospital building trip generation are based upon the number of beds and a net reduction in beds has been proposed.

The current development (719 beds) is projected to generate approximately 9,505 daily vehicle trips, 683 of which will occur during the morning peak hour and 669 of which will occur during the evening peak hour. The proposed development (650 beds) is projected to generate approximately 8,593 daily vehicle trips, 618 of which will occur during the morning peak hour and 605 of which will occur during the evening peak hour. The proposed development compared to the current development is projected to generate approximately 912 less daily vehicle trips, and 65 less trips occurring during the morning peak hour and 64 less trips occurring during the evening peak hour.

The traffic generation associated with the proposed project does not contribute 50 two-way trips to State arterial segments facilities or 100 two-way peak hour trips to State Freeway facilities. Therefore, the Tippecanoe Avenue/Anderson Street and I-10 Interchange is not required for analysis within the traffic study.

It should be noted that the I-10/Tippecanoe Interchange Improvement Project is in its Phase I construction period based upon the San Bernardino Associated Governments website. Phase II was planned to begin construction in the fall of 2013. Funds were secured to design and construct the interchange, and to provide local street improvements for both phases of the project. The City of Loma Linda has and continues to contribute to the cost of the interchange improvement project via the collection of development impact fees related to projects' traffic generation.

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Letter No. 4
Southern California Edison, October 28, 2013

Comment 4-1: SCE respectfully disagrees with the applicant's general assertion regarding the requirement for a conditional use and refers the applicant and the City to California Public Utilities Commission General Order 131-D as to SCE's substation permitting requirements.

Response 4-1: The California Public Utilities Commission (PUC) overrides any conflicting requirements of a City's Development Code related to design and construction of public utilities under the jurisdiction of the PUC. Cities typically have a standard set of conditions that they apply to projects. Utility facilities constructed in the City of Loma Linda require a Conditional Use Permit (CUP) in the Institutional zone. The CUP is a mechanism for the City to entitle the project in the institutional zone, not to arbitrarily add conditions to the project. Any conditions adopted by the City of Loma Linda for the substation associated with the Proposed Project would be in accordance with the PUC requirements.

Comment 4-2: Southern California Edison Company's rights-of-ways and fee-owned properties are purchased for the exclusive use of SCE to operate and maintain its present and future facilities. Any proposed use will be reviewed on a case-by-case basis by SCE. Approvals or denials will be in writing based upon review of the maps provided by the developer and compatibility with SCE right-of-way constraints and rights. In the event the project proposes to impact SCE facilities or its land related rights, please forward five (5) sets of project plans, and a PDF copy of the same, depicting SCE's facilities and its associated land rights to the following location for review as noted above:

Response 4-2: The City understands that any Proposed Project activities affecting SCE's rights-of-way, fee-owned properties, and/or facilities are subject to SCE approval. The Applicant would coordinate directly with SCE for any portion of the Proposed Project that would affect SCE property.

Comment 4-3: If development plans result in the need to build new or relocate existing SCE electrical facilities that operate at or above 50kV, the SCE construction may have environmental consequences subject to CEQA review as required by the California Public Utilities Commission (CPUC). If those environmental consequences are identified and addressed by the local agency in the CEQA process for the larger project, SCE may not be required to pursue a later, separate, mandatory CEQA review through the CPUC's General Order 131-D (GO 131-D) process. If the SCE facilities are not adequately addressed in the CEQA review for the larger project, and the new facilities could result in significant environmental impacts, the required additional CEQA review at

the CPUC could delay approval of the SCE power line portion of the project for two years or longer.

Response 4-3: The Draft EIR was prepared to address a potential SCE substation site at Elmer Digneo Park in the City of Loma Linda. If this site is selected by SCE, the City believes that the Draft EIR complies with CEQA for development of a substation at that site. The City acknowledges that any other site selected for new SCE facilities may require additional CEQA review and extended timelines.

Comment 4-4: Any questions or comments regarding this letter may be directed to Linda La Pierre Ortiz, Local Public Affairs Region Manager of SCE at (909) 307-6726.

Response 4-4: Comment noted.

Letter No. 5
Citizens Advocating Rational Development

Comment 5-1: The DEIR does not discuss any requirements that the Project adopt energy saving techniques and fixtures, nor is there any discussion of potential solar energy facilities which could be located on the roofs of the project. Under current building standards and codes which all jurisdictions have been advised to adopt, discussions of these energy uses are critical.

The construction of:

- 1) a seven-story, approximately 250,000 sf, 760-space patient and visitor parking structure;
- 2) a 13-story (approximately 215 feet in height), approximately 732,000 sf hospital with 464 beds to replace a portion of the seismically-noncompliant existing hospital, and 80 parking spaces;
- 3) an approximate 34,000 sf new or retrofitted utility plant;
- 4) an approximate 14,000 sf Southern CA Edison (SCE) upgraded on-site or new off-site electrical substation;
- 5) a two-story, approximately 9,000 sf addition to the existing dental school;
- 6) a four-story approximately 90,000 sf research building; and
- 7) tenant improvements and reuse of the vacated portions of the existing hospital.

Will devour copious quantities of electrical energy, as well as other forms of Energy.

Response 5-1: The City acknowledges that the buildout of the LLUH Campus will be a large energy consumer. Because of its past and current energy demands, the campus has had since 1989 its own energy cogeneration plant on-site to reduce its reliance on the electrical grid system maintained by Southern California Edison Company. As part of the Master Plan (see Draft EIR pages 3-12 and 3-13), the cogeneration power plant would be increased in phases from the existing 10 megawatts (MW) up to 22 megawatts, allowing LLUH to become even less reliant in time, on power purchased from others. The capacity increases are planned to be constructed in units of 7.3 MW and the maximum buildout would be 22 MW. The new utility plant, of which the cogeneration plant is a part of, is proposed in order to respond to Senate Bill 1953 (SB 1953) mandates to modernize obsolete and antiquated utility services, avoid disruption to ongoing patient care activities, and allow for increased future capacity.

Furthermore, Draft EIR Table 4.7-3 Quantifying GHG Mitigation Measures on page 4.7-12 lists various greenhouse gas emission reduction strategies that include energy conservation measures currently being implemented by LLUH and proposed to be continued with development of the Master Plan. The enforcement of implementing this measure is recommended in Mitigation Measure GHG-1 (Draft EIR pages 4.7-13 – 4.7-14) where the measures are reviewed and imposed by the City as conditions of approval at the time of building permit issuance.

Comment 5-2: The EIR (or DEIR – terms are used interchangeably herein) does not adequately address the issue of water supply.

What the DEIR fails to do is:

1. Document wholesale water supplies;
2. Document Project demand;
3. Determine reasonably foreseeable development scenarios, both near-term and long-term;
4. Determine the water demands necessary to serve both near-term and long-term development and project build-out.
5. Identify likely near-term and long-term water supply sources and, if necessary, alternative sources;
6. Identify the likely yields of future water from the identified sources;
7. Determine cumulative demands on the water supply system;
8. Compare both near-term and long-term demand to near-term and long-term supply options, to determine water supply sufficiency;
9. Identify the environmental impacts of developing future sources of water; and
10. Identify mitigation measures for any significant environmental impacts of developing future water supplies.
11. Discuss the effect of global warming on water supplies.

There is virtually no information in the DEIR which permits the reader to draw reasonable conclusions regarding the impact of the Project on water supply, either existing or in the future. For the foregoing reasons, this EIR is fatally flawed.

Response 5-2: All water supply concerns addressed in this comment are either addressed in the Draft EIR, or were not required to be addressed, for reasons listed in the following responses to comments 5-2.1 through 5-2.12 below.

Response 5-2.1: Water supplies are presented in the Draft EIR at pages 4.10-1 through 4.10-2 as follows: “The production and distribution of water within the City of Loma

Linda is provided by the City's Department of Public Works, Water Division. The City's water service area consists of approximately 10.6 square miles, which includes the City and Sphere of Influence areas. The source of water supply is groundwater in the Bunker Hill Basin pumped from six wells with a total production capacity of these wells totals 7,900 gallons per minute (gpm).

The LLUMC water system is supplied by two wells (Anderson 2 and Anderson 3) owned by the LLUH. The wells are approximately 1,100 feet deep with 1,100 gallon per minute (gpm) pumps on each well. The wells are capable of producing 3.16 million gallons per day (mgd), sufficient for existing domestic, irrigation and agricultural demands, and fire sprinkler requirements. The most recent water data available (2011 – 2012) indicate that the total daily water demand of the campus averages 1.24 mgd. Total demand is metered as 59% domestic, 23% irrigation, and 18% agricultural.”

Response 5-2.2: The Proposed Project's water demand is presented in the Draft EIR at page 4.10-9 as follows: “The most recent water data available (2011 – 2012) indicates that the total daily water demand of the campus averages 1.24 million mgd. The projected water demand is 1.47 mgd at buildout of the Master Plan, reflecting an estimated 15% increase in irrigation use, 10% reduction in agricultural use, and overall 18.5% increase over the year 2012-13 metered use.”

Response 5-2.3: Determine reasonably foreseeable development scenarios, both near-term and long-term; - this statement is not clearly understood, however it is believed that the author requests a discussion of cumulative impacts to determine what the overall buildout of the City would do to water supplies. The projected buildout of the City is presented in the Draft EIR at pages 5-3 through 5-5 and states: “Population projections within the General Plan and accompanying EIR were determined by multiplying the projected number of households by average persons per household. Based on the household characteristics cited in the updated Housing Element, the average household size in the city is 2.43 persons. Based on past growth rates in the City, population increases are anticipated to continue to average approximately 0.04 percent annually. Assuming a Southern California Association of Governments (SCAG) projected population of 27,797 persons in 2025, the build-out population of the City of Loma Linda, including its sphere of influence would be reached in 2029. Therefore, the projected 2029 population is the year in which General Plan build-out would occur under the amended General Plan and is the assumed build-out year used in the analysis. The 2006 General Plan and EIR assumed that 16,369 occupied households (applying a 5% vacancy rate) and a population of 37,649 would exist within the City and sphere of influence at build-out.

Utilizing the acreages and development densities of the amended General Plan's various land use classifications, and applying a five percent vacancy

rate, 13,049 households will be located within the Planning Area at build-out of the amended General Plan. Based on the average person per household factor cited in the updated Housing Element (2.43 persons per household), the 13,049 anticipated households would yield a total population of 31,709 persons at build-out (2030). Implementation of the General Plan (as amended) would result in a population decrease of approximately 5,940 persons from that previously identified in the General Plan EIR.

The General Plan established floor to area ratios (FARs) for each land use designation. Based on these FARs, the amount of land designated for various uses, the amount of commercial, industrial, and institutional square footage was identified in the certified EIR. These numbers have changed slightly for commercial land uses by 4.92 acres and are provided below in Table 5-1.”

**Table 5-1
City of Loma Linda
Build-out Projection by Land Use Type**

Build-out Scenario	Acres	FAR	Building Square Footage	Employment
Commercial	172.50	0.5	3,757,051	7,210
Institutional/Office/Business Park	370.94	0.5	8,079,073	19,387
Health Care	98.91	1.0	4,308,510	11,532
Industrial	17.93	0.6	468,618	33
City Facilities	11.75	0.5	213,507	626
Recreation	40.67	0.1	77,159	204
Total	712.73	--	7,003,918	38,992

Response 5-2.4: Water demands necessary to serve both near-term and long-term development and project build-out; it is believed that the comment is meant to discuss the water supply that would be necessary to serve buildout of the City General Plan and buildout of the LLUH Master Plan. This is discussed in the Draft EIR in Section 4.10 Utilities and Service Systems, and at Page 5-21 which states: “Regionally, the production and distribution of water within the City of Loma Linda is provided by the City’s Department of Public Works, Water Division. The City’s groundwater is supplied from six wells. The total production capacity of these wells totals 7,900 gallons per minute. In addition to the groundwater wells, the City has two emergency connections with the City of San Bernardino and one with the City of Redlands. The City has the ability to finance and construct required facilities necessary to obtain the water supply to meet planned growth through the collection of development fees and the use of other funding methods. However, the project is not anticipated to require any significant amount of additional water than what is currently being used at the site. No significant impacts are anticipated.

On a regional basis, the 2010 San Bernardino Valley Regional Urban Water Management Plan prepared for agencies including the City of Loma Linda. Projected annual water demand for City of Loma Linda, after accounting for water conservation programs projected to increase from 5,811 acre-feet in 2015 to 6,565 acre-feet in 2035. The planning area as a whole is projected to have a surplus of supply, during multiple-dry year periods, ranging from 40,584 acre-feet in 2015 to 46,699 acre-feet in 2035. The multiple-dry year is generally the lowest annual runoff for a 3-year or more consecutive period. There are no projected periods where demands would exceed supplies. Therefore, overall cumulative impacts from the Proposed Project and General Plan buildout will be less than significant. (see Draft EIR page 5-21).

The water system providing domestic water and irrigation service to the campus is owned by LLUH and includes a 16-inch diameter main that provides a connection from two existing water wells to a 1.4 million-gallon storage reservoir located south of the campus. The most recent water data available (2011 – 2012) indicates that the total daily water demand of the campus averages 1.24 million mgd. The projected water demand is 1.47 mgd at buildout of the Master Plan, reflecting an estimated 15% increase in irrigation use, 10% reduction in agricultural use, and overall 18.5% increase over the year 2012-13 metered use. Water is supplied by two wells (Anderson 2 and Anderson 3) that are located north of the campus between Anderson Street and Poplar Street. The wells are approximately 1,100 feet deep with 1,100 gpm pumps on each well. The wells are capable of producing 3.16 mgd, sufficient for existing and projected domestic, irrigation and agricultural demands; and fire sprinkler requirements. However, the Anderson 2 well occasionally experiences operational problems and a new well is anticipated to be constructed and operational by the end of 2013. This well is also expected to have a production capacity of 1,100 gpm. The City of Loma Linda's public water system surrounds the campus and is connected to the campus water system at three locations. There would be no potentially significant impacts to the existing water supplies or distribution system resulting from the Proposed Project (see Draft EIR pages 4.10-9 and 4.10-9).

Response 5-2.5: See Response to Comment 5-2.4 above.

Response 5-2.6: See Response to Comment 5-2.4 above. Also, page 4.10-2 of the Draft EIR addresses long-term water supply as follows: “The 2010 San Bernardino Valley Regional Urban Water Management Plan prepared for agencies including the City of Loma Linda projected annual water demand for the City, after accounting for water conservation programs, to increase from 5,811 acre-feet in 2015 to 6,565 acre-feet in 2035. The planning area as a whole is projected to have a surplus of supply, during multiple-dry year periods, ranging from 40,584 acre-feet in 2015 to 46,699 acre-feet in 2035. The multiple-dry year is generally the lowest annual runoff for a 3-year or more consecutive period. There are no projected periods where demands would

exceed supplies (2010 San Bernardino Valley Regional Urban Water Management Plan, pages 3-5 and 4-2).

Response 5-2.7: See Responses to Comments 5-2.3 and 5.2-4.

Response 5-2.8: See Response to Comment 5-2.6 above.

Response 5-2.9: The author does not indicate what sources of water supply should be discussed. However, as documented in the EIR, and as referenced in the preceding responses, the Proposed Project would have sufficient water supplies to meet projected demands and no additional sources of water supply are determined necessary to meet long-term demand of the Master Plan build-out.

Response 5-2.10: See Response to Comment 5-2.9; there are no identified impacts and therefore no need for mitigation measures.

Response 5-2.11: The effect of global warming on water supplies is not a project-level environmental issue and is not required to be addressed under the California Environmental Quality Act Guidelines.

Response 5-2.12: The Draft EIR clearly identifies impacts that would occur as a result of the Proposed Project. The City of Loma Linda believes that the analysis provided in the Draft EIR and its technical appendices is sufficient to determine the Proposed Project's impact on water supply, either existing or in the future and that the EIR is not flawed.

Comment 5-3: The EIR lacks sufficient data to either establish the extent of the problem which local emissions contribute to deteriorating air quality, greenhouse emissions or the closely related problem of global warming and climate change, despite the fact that these issues are at the forefront of scientific review due to the catastrophic effects they will have on human life, agriculture, industry, sea level risings, and the many other serious consequences of global warming. This portion of the EIR fails for the following reasons:

1. The DEIR does not provide any support or evidence that the Guidelines utilized in the analysis are in fact supported by substantial evidence. References to the work of others is inadequate unless the document explains in sufficient detail the manner and methodology utilized by others.
2. Climate change is known to affect rainfall and snow pack, which in turn can have substantial effect on river flows and ground water recharge. The impact thereof on the project's projected source of water is not discussed in an acceptable manner. Instead of giving greenhouse emissions and

global warming issues the short shrift that it does, the EIR needs to include a comprehensive discussion of possible impacts of the emissions from this project.

3. Climate change is known to affect the frequency and or severity of air quality problems, which is not discussed adequately.
4. The cumulative effect of this project taken with other projects in the same geographical area on water supply, air quality and climate change is virtually missing from the documents and the EIR is totally deficient in this regard.

Response 5-3.1: The Draft EIR was prepared to comply with the California Environmental Quality Act (CEQA), not to resolve various scientific positions taken related to air quality or climate change. The Air Quality guidelines and methodology used to evaluate the Proposed Project are documented in the Draft EIR on pages 4.7.4 through 4.7-8, Applicable Policies, Plans and Regulations. The use of the Guidelines and Models of the South Coast Air Quality Management District is sufficient to meet compliance standards of CEQA.

Response 5-3.2: Assessing a Proposed Project's impacts in relation to the change in rainfall and/or snow pack levels is out of the scope of CEQA. CEQA requires an analysis of greenhouse gas emissions, and specific significance thresholds have been adopted by local agencies and the State of California. The Draft EIR provides an adequate analysis of potential greenhouse gas emission impacts associated with the Proposed Project. Please refer to the Draft EIR Section 4.7 and the technical report presented as Appendix C.

Response 5-3.3: Please refer to Response to Comment 5-3.1.

Response 5-3.4: A discussion of Cumulative Impacts is presented in the Draft EIR in Section 5.0, Other CEQA Required Analysis. The cumulative effects of the Proposed Project are considered with buildout of the Loma Linda General Plan. The Draft EIR includes discussion of cumulative impacts on water supply, air quality and climate change. The City therefore disagrees that a discussion of these potential impacts is virtually missing from the document.

Comment 5-4: The alternative analysis fails in that the entire alternative-to-the-project section provides no discussion of the effects of the project, or the absence of the project, on surrounding land uses, and the likely increase in development that will accompany the completion of the project, nor does it discuss the deleterious effects of failing to update the project upon those same surrounding properties and the land uses which may or have occurred thereon.

Response 5-4: As discussed in Section 4.8 Land Use, specifically 4.8.4.2, the Proposed Project would occur within the boundaries of the existing LLUH campus and

potentially on a portion of Elmer Digneo City Park. The Project would expand medical services that are key to the City of Loma Linda's growth and compatible with the community vision; however, under both project alternatives evaluated (No Project Alternative and Reduced Scale Alternative) no increase in the development of surrounding areas would occur as all surrounding areas are currently developed. Therefore the City disagrees with the comment that the Proposed Project would result in an increase in development.

As stated in the Draft EIR (Section 6.0, page 6-5) the No Project Alternative, as well as the Reduced Scale Alternative, independently and in comparison to the Proposed Project are addressed for each of the environmental impact topics consistent with the impact analysis conducted in Chapter 4.0 of the Draft EIR. However, since no land use impacts associated with the Proposed Project were determined to be significant as a result of the analysis conducted, an evaluation of land use impacts associated with the alternatives was not conducted as there were no significant impacts to be reduced, as is the purpose of the Alternatives analysis.

Letter No. 6**South Coast Air Quality Management District, October 31, 2013**

Comment 6-1: The Lead Agency should use the localized significance thresholds to determine air quality impacts in the immediate vicinity. Therefore, when revising the air quality analysis for the proposed project, it is recommended that the Lead Agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing localized and regional air quality analyses can be found at: <http://www.aqmd.gov/ceqa/hdbk.html>

Response 6-1: SCAQMD has developed a voluntary methodology to assess the localized impacts of emissions from a project site (SCAQMD, *Final Localized Significance Threshold Methodology*, June 2003, revised July 2008) and recommends comparing projects to localized significance thresholds (LSTs). The LSTs were developed to analyze the significance of potential local air quality impacts of projects and the methodology provides screening tables for small projects. The project evaluated in the Draft EIR is buildout of the 24-acre Loma Linda University Medical Center (LLUMC) Master Plan.

The LLUMC has been in operation since 1967. Emissions generated by the proposed project would be from short-term construction of new and renovated facilities developed over a 10-year period and operational emissions from the utility plant. The nearest receptors are single family residential units, located approximately 82 feet to the east and south. A comparison of the construction and operational emissions with the 82 feet distance allowable emissions (for Source Receptor Area (SRA) No. 35 – East San Bernardino Valley; 5-acre site) are listed in Table 1. As the Proposed Project is 24 acres, a 5-acre site (as represented in the LST tables) represents a worst case analysis as the larger the site the greater allowable emissions. As shown, the project site emissions are not anticipated to exceed the LST allowable emissions. Therefore, no localized impacts are anticipated.

Table 1
Localized Significance Thresholds
(Emissions in lbs/day)

	ROG	NO_x	CO	PM₁₀	PM_{2.5}
Construction Emissions (Max. from Tables 4.2-4 to 4.2-6)	53.3	57.7	44.3	11.5	7.5
LST Allowable Emissions per 25 meters for Construction	*	270	2075	14	9
Greater Than Threshold	*	No	No	No	No
	ROG	NO_x	CO	PM₁₀	PM_{2.5}
Total Operational Emissions (difference from baseline or existing, Table 4.2-7)	11.9	-160.3	-55.6	-3.3	-3
LST Allowable Emissions per 25 meters for Operations	*	270	2075	4	3
Greater Than Threshold	N/A	No	No	No	No

Sources: SCAQMD *Final Localized Significance Threshold Methodology*, 2008; Look-up Tables October 21, 2009.

* ROG emissions are not assessed per LST.

Comment 6-2: The Lead Agency determined that the project will result in significant GHG impacts; therefore, the SCAQMD staff recommends that the following mitigation measures be included in the final EIR pursuant to Section 15126.4 of the CEQA Guidelines.

Additional Operational GHG Mitigation Measures – Transportation

- a) Provide electric car charging stations for tenants. Also, provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
- b) Provide incentives for employees and the public to use public transportation such as discounted transit passes and/or other incentives.
- c) Create local “light vehicle” networks, such as neighborhood electric vehicle (NEV) systems.
- d) Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn’t feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

Additional Operational GHG Mitigation Measures - Other

- e) Require use of electric lawn mowers and leaf blowers.
- f) Require use of electric or alternatively fueled sweepers with HEPA filters.
- g) Require the use of electric or alternative fueled maintenance vehicles.

Response 6-2: Yes the applicant will be required by the City to implement additional GHG mitigation measures as provided in the errata to Section 4.7 Greenhouse Gases, page 4.7-14 of the Draft EIR, and as presented below:

Transportation Measures

- a) Provide electric car charging stations for tenants. Also, provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
- b) Provide incentives for employees and the public to use public transportation such as discounted transit passes and/or other incentives.
- c) Create local “light vehicle” networks, such as neighborhood electric vehicle (NEV) systems.
- d) Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn’t feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

Other GHG Measures

- e) Require use of electric lawn mowers and leaf blowers.
- f) Require use of electric or alternatively fueled sweepers with HEPA filters.
- g) Require the use of electric or alternative fueled maintenance vehicles.

Comment 6-3: The proposed project includes an upgraded cogeneration power plant that requires SCAQMD permits. Therefore, SCAQMD staff recommends that the final EIR include additional discussion regarding the permits and emissions controls required for the proposed project. For example, the final EIR should elaborate on the storage and transfer of ammonia in the event that it will be used for emissions control equipment.

Response 6-3: Development of the new plant is anticipated to begin between years 2 through 6. Therefore, the operation (build out) of the plant may not occur until Year 10. Therefore, referencing current regulations would not be beneficial as emissions controls continue to reduce the level of equipment emissions and what will be in place in ten years cannot be quantified today. However, as indicated in the EIR, the new utility plant (when operational) must comply with SCAQMD Rules 201 and 212 that require permits and strict emission limitations and controls to construct and operate the facility. Also the plant will be required to comply with Rule 1401 and its limitations which are the same as the SCAQMD CEQA thresholds.

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Letter No. 7

California State Clearinghouse, October 29, 2013

Comment 7-1: Comment states that the Draft EIR was submitted to select state agencies for review, and comments from a responding agency is enclosed. Comments are forwarded for use in preparing the final environmental document.

Response 7-1: Thank you; the comment letter from the Native American Heritage Commission was also submitted directly to the Lead Agency and appropriate responses are presented to their letter, numbered Letter 1.

Comment 7-2: Comment indicates that letter acknowledges compliance with the State Clearinghouse review requirements for the draft environmental document, pursuant to the California Environmental Quality Act.

Response 7-2: Comment noted.

5.0 MITIGATION MONITORING AND REPORTING PROGRAM

5.1 INTRODUCTION

The mitigation monitoring and reporting program (MMRP) was prepared to implement the mitigation measures identified in the LLUH Master Plan EIR. CEQA Section 21081.6 requires adoption of a monitoring program when mitigation measures have been identified that would reduce or avoid significant environmental effects.

CEQA requires adoption of a monitoring program for those measures or conditions placed on a project to mitigate or avoid adverse effects on the environment. The law states that the monitoring program shall be designed to ensure compliance during project implementation. When implemented, environmental effects associated with the development of the LLUH Master Plan will be reduced or eliminated.

The MMRP was prepared and contains the following elements:

1. Measures that act to mitigate significant impacts on the environment are recorded with the action and the procedure necessary to ensure compliance.
2. A procedure of compliance and verification has been outlined for each action necessary. This procedure designates who will take action, what action will be taken and when, and to whom and when compliance will be reported.
3. The MMRP has been designed to provide focused, yet flexible guidelines. As monitoring progresses, changes to compliance procedures may be necessary based upon recommendations by those responsible for the program.

5.2 RESPONSIBILITIES AND AUTHORITY

The City of Loma Linda (City) will be the primary agency, but not the only agency responsible for implementing the mitigation measures. In some cases, the City or other public agency will implement measures. In other cases, the project applicant will be responsible for implementation of measure and the City's role is exclusively to monitor the implementation of the measures. In this case, the project applicant may choose to require the construction contractor to implement specific mitigation measures prior to and/or during construction.

5.3 MONITORING PERSONNEL

The City of Loma Linda is responsible for ensuring that the mitigation measures in this Final EIR are implemented. The City reserves the right to hire technical experts and professional to help in evaluating compliance. These may include but are not limited to biologists, archaeologists and planning professionals.

For impacts related to construction of the Project, the project planner or responsible City department has the authority to stop the work of construction contractors if compliance with any aspects of the MMRP are not occurring after written notification has been issued.

5.0 Mitigation Monitoring and Reporting Program

If any impacts require long-term monitoring, the applicant shall provide the City with a plan for monitoring the mitigation activities at the project site and reporting the monitoring results to the City.

MITIGATION MONITORING REPORTING PROGRAM

Project: Loma Linda University Health Master Plan

Applicant: Loma Linda University Health

Lead Agency: City of Loma Linda

Date: January 2014

Mitigation Measures No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date /Initials
Aesthetics					
AES-1: Prior to issuance of grading and/or building permits for the Proposed Project, all tree removals or relocations that occur within the public right-of-way and/or at the Elmer Digneo City Park shall be approved by the Community Development Department and monitored by the City's Public Works Department.	City of Loma Linda Community Development Department	Prior to construction	Prior to commencing operations	On-site Inspection	
AES-2: The trees of special significance as outlined in the August 2013 Arborist Report include: the Baby Fae Holly Oak, the Kiwanis Club Citrus Orchard, and the Elenore Graves Memorial Tree. Replacement of these trees requires a replacement with a minimum 36-inch box size.	City of Loma Linda Community Development Department	Prior to construction	Prior to commencing operations	On-site Inspection	
AES-3: In the event SCE Option 1 is selected and the a new SCE substation would be constructed at the Elmer Digneo Park City Park, the Community Development Department and Project Proponent shall meet to discuss appropriate design, materials and colors of the utilitarian structure to ensure that it blends with the existing restroom structure on-site. Screening of the building shall also be discussed and may include trees, bushes or vines to screen the structure.	City of Loma Linda Community Development Department	Prior to construction	Prior to commencing operations	On-site Inspection	
AES-4: Prior to issuance of a grading or building permits, the Project Proponent shall submit a photometric plan for review and approval by the City Community Development Department. The plan may either be submitted for the individual structures or improvements as outlined in the Master Plan, or for the entire LLUH Master Plan Project.	City of Loma Linda Community Development Department	Prior to issue of grading or building permits	Prior to commencing operations	Review of Plans	

Mitigation Measures No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date /Initials
<p>AES-5: Project design features shall be incorporated to provide landscaping, physical barriers, screening, or other buffers to minimize project-generated illumination from entering off-site areas and to prevent glare for residential development located south, east and west of the Project Site.</p>	<p>City of Loma Linda Community Development Department</p>	<p>Prior to construction</p>	<p>Prior to commencing operations</p>	<p>On-Site-Inspection</p>	
Cultural Resources					
<p>CR-1: The Project Proponent (LLUH) shall have an archaeological monitor on-site during any proposed demolition and initial ground altering activities to ensure adequate and accurate recordation of the demolition and to document any potentially significant archaeological discoveries. The archeological monitor shall oversee excavations within the younger alluvial deposits. The extent and duration of any required monitoring shall be dependent upon the various task-related schedules and at the discretion of the City of Loma Linda.</p> <p>The City shall notify local tribes of when construction would begin on the Project, so that tribes have the opportunity to have a monitor present if they so desire.</p>	<p>Applicant/ Contractor; City of Loma Linda Community Development Department, and Qualified Archeologist</p>	<p>During grading and site preparation</p>	<p>In the event cultural resources are discovered</p>	<p>On-site inspection</p>	
<p>CR-2: In accordance with 36 CFR 800.13(b)(3), the State Historic Preservation Officer and Native American tribal contacts of the Serrano and Gabrielino tribes, as well as the Advisory Council on Historic Preservation shall be notified within 48 hours of the discovery of any archaeological artifacts.</p>	<p>Applicant/ Contractor; City of Loma Linda Community Development Department/Native American Heritage Commission</p>	<p>During grading and site preparation</p>	<p>In the event archeological artifacts are discovered</p>	<p>On-site inspection</p>	
<p>CR-3: In the event Risley Hall or the Housekeeping building are demolished or significantly altered, the structures shall be documented with additional photographs, compilation of any architectural drawings that may be available through the LLUH archives, and the preparation of a brief historical summary documenting the uses and associations of the buildings within the greater campus history.</p>	<p>City of Loma Linda Community Development Department</p>	<p>During construction</p>	<p>In event of demolishing or significantly altering Risley Hall and Housekeeping Building</p>	<p>On-site inspection</p>	

Mitigation Measures No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date /Initials
<p>CR-4: The Project Proponent (LLUH) shall have a paleontological monitor on-site during any proposed demolition and initial ground altering activities to insure adequate and accurate recordation of the demolition and to document any potentially significant paleontological discoveries. The paleontological monitor shall be responsible for overseeing excavations impacting older alluvium. The extent and duration of any required monitoring shall be dependent upon the various task-related schedules and at the discretion of the City of Loma Linda.</p>	<p>Applicant/ Contractor, City of Loma Linda Community Development Department and Certified Paleontologist</p>	<p>During grading and site preparation</p>	<p>In event cultural resources are discovered</p>	<p>On-site inspection</p>	
<p>CR-5: If human remains of any kind are found during construction activities, all activities must cease immediately and the San Bernardino County Coroner and a qualified archaeologist must be notified. The Coroner shall examine the remains and determine the next appropriate action based on his or her findings. If the Coroner determines the remains to be of Native American origin, he or she shall notify the Native American Heritage Commission. The Native American Heritage Commission shall then identify the most likely descendants to be consulted regarding treatment and/or reburial of the remains. If a most likely descendant cannot be identified, or the most likely descendant fails to make a recommendation regarding the treatment of the remains within 48 hours after gaining access to them, the Project Proponent shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.</p>	<p>Applicant/Contractor /County Coroner/ Qualified Archaeologist</p>	<p>During Construction</p>	<p>In event human remains are found</p>	<p>On-site inspection</p>	

Mitigation Measures No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date /Initials
Geology and Soils					
GS-1: Prior to issuance of grading and/or building permits for the Proposed Project, including permits for utilities, the Project Proponent shall submit updated Geologic and Geotechnical Investigations as recommended by the CHJ studies for addressing the final project design of all structures proposed for construction.	Applicant and City of Loma Linda Building and Safety Division	Prior to issuance of grading /building permits	During review of grading/building plans	Review of plans	
GS-2: Prior to issuance of grading and/or building permits for the proposed new hospital towers, including permits for utilities, the Project Proponent shall submit development plans that incorporate the recommendations of the geotechnical report prepared by MACTEC Engineering and Consulting, Inc., dated July 13, 2011 (Appendix E-1) for preliminary foundation work, utility trenching, and concrete slabs. These include specifications for concrete slabs and footings, temporary excavation for utilities, preliminary pavement design, and protection of foundations from surface drainage.	Applicant and City of Loma Linda Building and Safety Division	Prior to issuance of building permits	During review of final development plans	Review of final plans	
GS-3: As part of the new hospital towers construction, all existing fill and the upper natural soils shall be removed to allow for the placement of at least two feet of properly compacted fill beneath hardscape, concrete walkways, and paving. The required fill should be uniformly well compacted and observed and tested during placement. The on-site soils may be used in the required fill.	Applicant and City of Loma Linda Building and Safety Division	During grading and site preparation	During review of final development plans	Review of plans	
GS-4: Prior to issuance of grading and/or building permits for the proposed new parking structure the Applicant shall submit a site-specific liquefaction and seismically-induced settlement evaluation as part of the geotechnical investigation for the project as recommended in the geotechnical report prepared by AMEC, dated July 28, 2013 (Appendix E-2). Recommendations contained in the site-specific liquefaction and seismically-induced settlement evaluation shall be incorporated in the parking structure final design.	Applicant and City of Loma Linda Building and Safety Division	Prior to issuing grading /building permits	During final review of building/grading plans	Review of final plans	

Mitigation Measures No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date /Initials
GS-5: Prior to issuance of grading and/or building permits for the SCE Option 1 substation site, the Project Proponent shall submit a site specific geotechnical investigation as recommended by the CHJ studies and based upon the final design provided by SCE.	Applicant and City of Loma Linda Building and Safety Division	Prior to issuing grading /building permits	During review of building/grading plans	Review of plans	
GS-6: Prior to issuance of grading and/or building permits for the Utility Plant Option 1 site, the Project Proponent shall submit a site specific geotechnical investigation as recommended by the CHJ studies and based upon the final utility plant design.	Applicant and City of Loma Linda Building and Safety Division	Prior to issuing grading /building permits	During review of building/grading permits	Review of plans	
GS-7: In accordance with the Geologic/Geotechnical reports prepared for elements of the Master Plan, wind and water erosion of soils at the Elmer Digneo City Park shall be reduced by minimizing grading activities and grading occurring immediately prior to new construction activities.	Applicant and City of Loma Linda Building and Safety Division	During grading and site preparation	During review of grading plans	On-site inspection	
GS-8: Disturbed soils shall be watered at least twice daily to ensure the control of fugitive dust escaping off-site.	Applicant and City of Loma Linda Building and Safety Division	Throughout the construction of the project	During review of building/grading permits	On-site inspection	
GS-9: A National Pollutant Discharge Elimination System permit shall be obtained before construction is started. If the area of disturbance is greater than one acre, a Storm Water Pollution Prevention Program must be submitted to the City and shall show how storm waters will be controlled through Best Management Practices to avoid off-site sedimentation.	Applicant and City of Loma Linda Building and Safety Division	Prior to construction	Prior to commencing operations	Review of plans	
GS-10: Soils left bare or inactive for longer than thirty days shall be planted with ground cover or covered by approved means to assure no loss of topsoil.	Applicant and City of Loma Linda Building and Safety Division	Throughout construction	During review of plans	On-site inspection	
Hazards and Hazardous Materials					
HAZ-1: Prior to the issuance of a building or demolition permits the Project Proponent shall prepare an Asbestos Survey and Lead Inspection report to determine the quantity of materials present and establish proper handling procedures for safe removal and disposal. The applicant will be required to comply with the findings of the analysis.	Applicant and City of Loma Linda Community Development Department	Prior to issuance of building or demolition permits	Prior to commencing operations	Review of tenant improvement plans	

Mitigation Measures No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date /Initials
Greenhouse Gases					
<p>GHG-1: The Applicant shall implement the following applicable GHG Mitigations Measures as listed in Table 4.7-3 which will be reviewed and imposed by the City as conditions of approval at the time of building permit issuance.</p> <p style="text-align: center;">Energy</p> <p>Building Energy Use</p> <ul style="list-style-type: none"> • Buildings Exceed Title 24 Building Envelope Energy Efficiency Standards By 10%) • Install Energy Efficient Appliances • Install Energy Efficient Boilers <p>Lighting</p> <ul style="list-style-type: none"> • Install Higher Efficacy Public Street and Area Lighting <p>Alternative Energy Generation</p> <ul style="list-style-type: none"> • Establish Onsite Renewable Energy Systems-Solar Power <p style="text-align: center;">Transportation</p> <p>Land Use/Location</p> <ul style="list-style-type: none"> • Increase Diversity of Urban and Suburban Development (Mixed Use) • Improve Destination Accessibility • Increase Transit Accessibility <p>Neighborhood/Site Enhancements</p> <ul style="list-style-type: none"> • Provide Pedestrian Network Improvements • Implement a Neighborhood Electric Vehicle (NEV) Network • Provide Electric Vehicle Parking/charging stations <p>Parking Policy/Pricing</p> <ul style="list-style-type: none"> • Limit Parking Supply <p>Commute Trip Reduction Programs</p> <ul style="list-style-type: none"> • Implement Commute Trip Reduction Program • Implementation/Monitoring • Provide Ride-Sharing Programs • Implement Subsidized or Discounted Transit 	City of Loma Linda Community Development Department	Throughout construction of the project.	Time of building permit issuance	On-site inspections	

Mitigation Measures No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date /Initials
<ul style="list-style-type: none"> • Encourage Telecommuting and Alternative Work Schedules • Implement Commute Trip Reduction Marketing • Provide Employer-Sponsored Vanpool/Shuttle • Implement Bike-Sharing/Alternative Transportation Programs <p style="text-align: center;">Operational</p> <ul style="list-style-type: none"> • Require the use of 2010 compliant diesel delivery trucks • Require use of electric lawn mowers and leaf blowers • Require use of electric or alternatively fueled sweepers and HEPA filters • Require the use of electric or alternative fueled maintenance vehicles <p style="text-align: center;">Water</p> <p>Water Use</p> <ul style="list-style-type: none"> • Install Low-Flow Water Fixtures • Adopt a Water Conservation Strategy • Design Water-Efficient Landscapes • Use Water-Efficient Landscapes <p>Reduce Turf in Landscapes and Lawns</p>					
Noise					
<p>N-1: In the event Utility Plant Option 1 site is selected, a 12-foot temporary sound barrier shall be used along the south edge of the construction site. The temporary sound barrier may be constructed of plywood with a total thickness of 1-1/2 inches, or a sound blanket wall may be used. If sound blankets are used the blanket must have a Sound Transmission Class (STC) rating of 27.</p>	City of Loma Linda Community Development Department	Prior to construction	In the event Utility Plant Option 1 is selected.	On-site inspection	
<p>N-2: Prior to construction, the Project Proponent shall submit to the City a noise control plan that shows that the utility plant is designed to achieve a noise level of 50 dBA (Leq) or less at a distance of 300 feet. Achieving this noise level shall insure that the utility plant noise is less than ambient conditions at Lindsay Hall and would not have an adverse noise effect on the campus.</p>	City of Loma Linda Community Development Department	Prior to construction	During review of noise control plan	Review of plans	

Mitigation Measures No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date /Initials
<p>N-3: A 12-foot temporary sound barrier shall be used along the east boundary of the new hospital construction site. The temporary sound barrier may be constructed of plywood with a total thickness of 1-1/2 inches, or a sound blanket wall may be used. If sound blankets are used the blanket must have a Sound Transmission Class (STC) rating of 27.</p>	City of Loma Linda Community Development Department	Throughout construction of the new hospital.	Prior to commencing construction of the new hospital.	On-site inspection	
<p>N-4: The Project Proponent and contractor shall limit grading and building construction to the hours of 7:00 am to 8:00 pm Monday through Friday, except no construction shall occur after 4:00 pm on Fridays. Heavy construction is not permitted on weekends or national holidays, unless approved by the City. During times extra work is necessary and is approved by the City to occur outside these times allowed, work shall not exceed noise levels at sensitive receptors of 100 dBA at 50 feet. All equipment must be properly equipped with standard noise muffling apparatus specifically for such equipment (i.e., exhaust mufflers). The City may require the Project Proponent to monitor and report noise levels on a daily basis.</p>	City of Loma Linda Community Development Department	Prior to issuance of occupancy permits	Prior to commencing operations	On-site inspection	
<p>N-5: The Project Proponent shall include the following language in all construction documents for all construction occurring during the period of the Master Plan and shall provide weekly monitoring reports to the City Engineer, as required.</p> <p>Design considerations:</p> <ul style="list-style-type: none"> • Construct noise barriers, such as temporary walls between noisy activities and noise sensitive receivers. • Stationary noise sources shall be located as far away from sensitive receptors as possible. They shall be muffled and enclosed within tem Reroute truck traffic away from residential streets and most sensitive medical facilities, if possible. <p>Sequence of Operations:</p> <ul style="list-style-type: none"> • Combine noisy operations to occur in the same time period. The total noise level produced will not be significantly greater than the level 	City of Loma Linda Building and Safety Division	Review of construction documents	Prior to issuing grading/building permits	Review of final plans.	

Mitigation Measures No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date /Initials
<p>produced if the operations were performed separately.</p> <ul style="list-style-type: none"> Avoid nighttime activities. Sensitivity to noise increases during nighttime hours. <p>Alternative construction methods:</p> <ul style="list-style-type: none"> Select demolition methods not involving impact, where practicable. Avoid impact pile driving where possible. Drilled piles or the use of a sonic or vibratory pile driver are quieter alternatives where the geological conditions permit their use. Impact tools shall be hydraulically or electrically powered wherever possible to avoid noise from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler shall be used. 					
Utilities					
<p>USS-1: The Project Proponent shall comply with City-adopted policies regarding the reduction of construction and demolition (C&D) materials. Removal of vegetation shall be in accordance with application City policies.</p>	<p>City of Loma Linda Community Development Department</p>	<p>Throughout construction</p>	<p>On-site inspection</p>	<p>On-site inspection</p>	

APPENDIX A
COMMENTS RECEIVED ON DRAFT EIR

Letter 1

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard
West Sacramento, CA 95691
(916) 373-3715
(916) 373-5471 – FAX
e-mail: ds_nahc@pacbell.net

September 17, 2013

Mr. Guillermo Arreola

City of Loma Linda Community Development

Department: Planning Division

25541 Barton Road
Loma Linda, CA 92354

RE: SCH#20130051043 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the “**LOMA LINDA UNIVERSITY HEALTH MASTER PLAN PROJECT**” located in the City of Loma Linda; San Bernardino County, California

Dear Mr. Arreola:

The Native American Heritage Commission (NAHC) has reviewed the CEQA Notice regarding the above referenced project. In the 1985 Appellate Court decision (170 Cal App 3rd 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

1-1

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to

1-2

the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

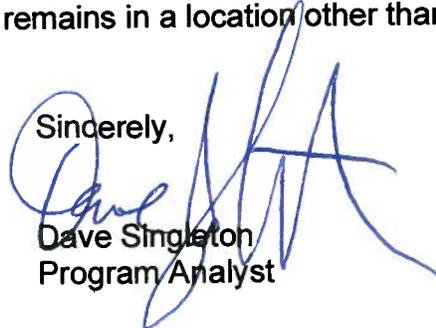
1-2
Cont.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

1-3

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans. Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

1-4

Sincerely,

Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts
San Bernardino County
September 17, 2013**

Pechanga Band of Mission Indians
Paul Macarro, Cultural Resources Manager
P.O. Box 1477 Luiseno
Temecula , CA 92593
(951) 770-8100
pmacarro@pechanga-nsn.
gov
(951) 506-9491 Fax

Ramona Band of Cahuilla Mission Indians
Joseph Hamilton, Chairman
P.O. Box 391670 Cahuilla
Anza , CA 92539
admin@ramonatribe.com
(951) 763-4105
(951) 763-4325 Fax

San Manuel Band of Mission Indians
Carla Rodriguez, Chairwoman
26569 Community Center Drive Serrano
Highland , CA 92346
(909) 864-8933
(909) 864-3724 - FAX
(909) 864-3370 Fax

Gabrielino/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693 Gabrielino Tongva
San Gabriel , CA 91778
GTTribalcouncil@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 -FAX

Gabrielino /Tongva Nation
Sandonne Goad, Chairperson
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
sgoad@gabrielino-tongva.com
951-845-0443

Morongo Band of Mission Indians
William Madrigal, Jr., Cultural Resources Manager
12700 Pumarra Road Cahuilla
Banning , CA 92220 Serrano
(951) 201-1866 - cell
wmadrigal@morongo-nsn.
gov
(951) 572-6004 Fax

San Manuel Band of Mission Indians
Daniel McCarthy, M.S., Director-CRM Dept.
26569 Community Center. Drive Serrano
Highland , CA 92346
(909) 864-8933, Ext 3248
dmccarthy@sanmanuel-nsn.
gov
(909) 862-5152 Fax

Morongo Band of Mission Indians
Robert Martin, Chairperson
12700 Pumarra Road Cahuilla
Banning , CA 92220 Serrano
(951) 849-8807
(951) 755-5200
(951) 922-8146 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013051043; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Loma Linda University Health Master Plan Project; located in the City of Loma Linda; San Bernardino County, California.

**Native American Contacts
San Bernardino County
September 17, 2013**

Serrano Nation of Mission Indians
Goldie Walker, Chairwoman
P.O. Box 343 Serrano
Patton , CA 92369

(909) 528-9027 or
(909) 528-9032

Ernest H. Siva
Morongo Band of Mission Indians Tribal Elder
9570 Mias Canyon Road Serrano
Banning , CA 92220 Cahuilla
siva@dishmail.net
(951) 849-4676

SOBOBA BAND OF LUISENO INDIANS
Joseph Ontiveros, Cultural Resource Department
P.O. BOX 487 Luiseno
San Jacinto , CA 92581
jontiveros@soboba-nsn.gov
(951) 663-5279
(951) 654-5544, ext 4137

Gabrielino /Tongva Nation
Sam Dunlap, Cultural Resources Director
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
samdunlap@earthlink.net
909-262-9351

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

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DEPARTMENT OF PUBLIC WORKS Letter 2

FLOOD CONTROL • LAND DEVELOPMENT & CONSTRUCTION • OPERATIONS
SOLID WASTE MANAGEMENT • SURVEYOR • TRANSPORTATION



COUNTY OF SAN BERNARDINO

825 East Third Street • San Bernardino, CA 92415-0835 • (909) 387-8104
Fax (909) 387-8130

GERRY NEWCOMBE
Director of Public Works

October 16, 2013

File: 10(ENV)-4.01

Guillermo Arreola
City of Loma Linda Community Development Department
25541 Barton Road
Loma Linda, CA. 92354

RE: CEQA – NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE LOMA LINDA UNIVERSITY HEALTH MASTER PLAN PROJECT FOR THE CITY OF LOMA LINDA

Mr. Arreola:

Thank you for giving the San Bernardino County Department of Public Works (Department) and the San Bernardino County Flood Control District (District) the opportunity to comment on the above-referenced project. **We received this request on September 12, 2013**, and pursuant to our review, the following comments are provided:

Flood Control Planning Division (David Lovell, PWE III, 909-387-7964):

1. Since changes will occur within the proposed project area that may affect drainage, please refer to "Comprehensive Storm Drain Plan #4" (CSDP #4), which is available at the offices of San Bernardino County Flood Control District. This document is an advanced planning tool to assist in directing surface runoff safely toward local drainage facilities. It is requested that the proposed development be in conformity with CSDP #4. 2-1
2. If any construction is required within District right-of-way, a permit must be obtained from the Department's Permits/Operations Support Division, and such construction must conform to District Standards. 2-2

If you have any questions, please contact the individuals who provided the specific comment, as listed above.

Sincerely,

ANNESLEY IGNATIUS, P.E.
Deputy Director – Environmental & Construction

ARI:PE:nh/CEQA Comments_DEIR_LLJ Health Master Plan_10-17-13

GREGORY C. DEVEREAUX
Chief Executive Officer

Board of Supervisors			
ROBERT A. LOVINGOOD	First District	JAMES RAMOS	Third District
JANICE RUTHERFORD	Second District	GARY C. OVITT	Fourth District
JOSIE GONZALES	Fifth District		

Letter 3

DEPARTMENT OF TRANSPORTATION

DISTRICT 8

PLANNING (MS 725)

464 WEST FOURTH STREET, 6th FLOOR

SAN BERNARDINO, CA 92401-1400

PHONE (909) 383-4557

FAX (909) 383-5936

TTY 711

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*Flex your power!
Be energy efficient!*

October 18, 2013

Guillermo Arreola
Associate Planner
Community Development Department
25541 Barton Road
Loma Linda, CA 92354

Loma Linda University Health (LLUH) Campus Transformation Project, 08-SBD-10-PM26.67

Mr. Arreola

The California Department of Transportation reviewed the Loma Linda University Health (LLUH) campus transformation Project and have the following comments:

1. The Tippecanoe Avenue/Anderson Street and I-10 interchange should be analyzed.

3-1

We appreciate the opportunity to offer comments concerning this project. If you have any questions regarding this letter, please contact Harish Rastogi at (909) 383-6908 or myself at (909) 383-4557 for assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Kopulsky".

DANIEL KOPULSKY
Office Chief
Community and Regional Planning

Letter 4



October 28, 2013

Attn: Mr. Guillermo Arreola
Associate City Planner
City of Loma Linda
25541 Barton Road
Loma Linda, CA 92354

Re: Loma Linda University Health (LLUH) Master Plan Project

Southern California Edison (SCE) appreciates the opportunity to provide comment on the above referenced project.

SCE respectfully disagrees with the applicant's general assertion regarding the requirement for a conditional use and refers the applicant and the City to California Public Utilities Commission General Order 131-D as to SCE's substation permitting requirements.

4-1

Southern California Edison Company's rights-of-ways and fee-owned properties are purchased for the exclusive use of SCE to operate and maintain its present and future facilities. Any proposed use will be reviewed on a case-by-case basis by SCE. Approvals or denials will be in writing based upon review of the maps provided by the developer and compatibility with SCE right-of-way constraints and rights. In the event the project proposes to impact SCE facilities or its land related rights, please forward five (5) sets of project plans, and a PDF copy of the same, depicting SCE's facilities and its associated land rights to the following location for review as noted above:

4-2

Real Properties Department
Southern California Edison Company
2131 Walnut Grove Avenue
G.O.3 – Second Floor
Rosemead, CA 91770

Please be advised if development plans result in the need to build new or relocate existing SCE electrical facilities that operate at or above 50 kV, the SCE construction may have environmental consequences subject to CEQA review as required by the California Public Utilities Commission (CPUC). If those environmental consequences are identified and addressed by the local agency in the CEQA process for the larger project, SCE may not be required to pursue a later, separate, mandatory CEQA review through the CPUC's General Order 131-D (GO 131-D) process. If the SCE facilities are not adequately addressed in the CEQA review for the larger project, and the new facilities could result in significant environmental impacts, the required additional CEQA review at the CPUC could delay approval of the SCE power line portion of the project for two years or longer.

4-3

Once again, we appreciate the opportunity to comment on the project. If you have any questions regarding this letter, do not hesitate to contact me at (909) 307-6726.

4-4

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda La Pierre Ortiz".

Linda La Pierre Ortiz
Local Public Affairs Region Manager
Southern California Edison Company

Letter 5



Guillermo Arreola
City of Loma Linda
(909) 799-2830
25541 Barton Road
Loma Linda, CA 92354

Re: Loma Linda University Health (LLUH) Master Plan Project
SCH Number - 2013051043

Dear Mr.Arreola,

The undersigned represents Citizens Advocating Rational Development ("CARD"), a non-profit corporation dedicated to issues in development and growth.

This letter contains comments on the Draft Environmental Impact Report on the Loma Linda University Health (LLUH) Master Plan Project, in accordance with CEQA and the Notice of Completion and Availability. Please ensure that these comments are made a part of the public record.

ENERGY

The DEIR does not discuss any requirements that the Project adopt energy saving techniques and fixtures, nor is there any discussion of potential solar energy facilities which could be located on the roofs of the Project. Under current building standards and codes which all jurisdictions have been advised to adopt, discussions of these energy uses are critical.

The construction of:

- 1) a seven-story, approximately 250,000 sf, 760-space patient and visitor parking structure;

- 2) a 13-story (approximately 215 feet in height), approximately 732,000 sf hospital with 464 beds to replace a portion of the seismically-noncompliant existing hospital, and 80 parking spaces;
- 3) an approximate 34,000 sf new or retrofitted utility plant;
- 4) an approximate 14,000 sf Southern CA Edison (SCE) upgraded on-site or new off-site electrical substation;
- 5) a two-story, approximately 9,000 sf addition to the existing dental school;
- 6) a four-story approximately 90,000 sf research building; and
- 7) tenant improvements and reuse of the vacated portions of the existing hospital.

will devour copious quantities of electrical energy, as well as other forms of energy.

WATER SUPPLY

The EIR (or DEIR – the terms are used interchangeably herein) does not adequately address the issue of water supply, which in California, is a historical environmental problem of major proportions.

What the DEIR fails to do is:

1. Document wholesale water supplies;
2. Document Project demand;
3. Determine reasonably foreseeable development scenarios, both near-term and long-term;
4. Determine the water demands necessary to serve both near-term and long-term development and project build-out.
5. Identify likely near-term and long-term water supply sources and, if necessary, alternative sources;
7. Identify the likely yields of future water from the identified sources;
8. Determine cumulative demands on the water supply system;
9. Compare both near-term and long-term demand to near-term and long-term supply options, to determine water supply sufficiency;
10. Identify the environmental impacts of developing future sources of water; and

11. Identify mitigation measures for any significant environmental impacts of developing future water supplies.
12. Discuss the effect of global warming on water supplies.

There is virtually no information in the DEIR which permits the reader to draw reasonable conclusions regarding the impact of the Project on water supply, either existing or in the future.

For the foregoing reasons, this EIR is fatally flawed.

AIR QUALITY/GREENHOUSE EMISSIONS/CLIMATE CHANGE

The EIR lacks sufficient data to either establish the extent of the problem which local emissions contribute to deteriorating air quality, greenhouse emissions or the closely related problem of global warming and climate change, despite the fact that these issues are at the forefront of scientific review due to the catastrophic effects they will have on human life, agriculture, industry, sea level risings, and the many other serious consequences of global warming.

This portion of the EIR fails for the following reasons:

1. The DEIR does not provide any support or evidence that the Guidelines utilized in the analysis are in fact supported by substantial evidence. References to the work of others is inadequate unless the document explains in sufficient detail the manner and methodology utilized by others.
2. Climate change is known to affect rainfall and snow pack, which in turn can have substantial effects on river flows and ground water recharge. The impact thereof on the project's projected source of water is not discussed in an acceptable manner. Instead of giving greenhouse emissions and global warming issues the short shrift that it does, the EIR needs to include a comprehensive discussion of possible impacts of the emissions from this project.
3. Climate change is known to affect the frequency and or severity of air quality problems, which is not discussed adequately.
4. The cumulative effect of this project taken with other projects in the same geographical area on water supply, air quality and climate change is virtually missing from the document and the EIR is totally deficient in this regard.

For the foregoing reasons, the EIR is fatally flawed.

ALTERNATIVE ANALYSIS

The alternative analysis fails in that the entire alternatives-to-the-project section provides no discussion of the effects of the project, or the absence of the project, on surrounding land uses, and the likely increase in development that will accompany the completion of the project, nor does it discuss the deleterious effects of failing to update the project upon those same surrounding properties and the land uses which may or have occurred thereon.

Thank you for the opportunity to address these factors as they pertain to the referenced DEIR.

Very truly yours,

CITIZENS ADVOCATING RATIONAL DEVELOPMENT

NICK R. Green

President



Letter 6

South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

E-Mailed: October 31, 2013
garreola@lomalinda-ca.gov

October 31, 2013

Mr. Guillermo Arreola
Community Development Department
25541 Barton Road
Loma Linda, CA 92354

**Review of the Draft Environmental Impact (Draft EIR)
for the Proposed Loma Linda University Health Master Plan Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the final environmental impact report (final EIR) as appropriate.

Based on a review of the Draft MND the proposed project will require construction and operational activity in close proximity to sensitive land uses¹ (e.g., residential land uses). However, it does not appear that the Lead Agency has quantified the potential localized air quality impacts from this construction and operational activity. As a result, SCAQMD staff is concerned about potential localized air quality impacts to sensitive receptors that surround the project site (for example, residential units located adjacent to the eastern and western boundary of the project site). Further, SCAQMD staff is concerned about the potential greenhouse gas (GHG) impacts from operation of the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency quantify the project's localized construction air quality impacts and compare the results to the SCAQMD's California Environmental Quality Act (CEQA) construction significance thresholds. Also, the SCAQMD staff recommends that the Lead Agency incorporate additional mitigation to minimize the project's GHG impacts pursuant to Section 15126.4 of the CEQA Guidelines and provide additional discussion regarding the operational equipment requirements (e.g., stationary source equipment and emissions controls requiring SCAQMD permits) for the proposed project.

6-1

¹ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

Guidance for Performing a Localized Construction and Operational Air Quality Analysis

The Lead Agency should use the localized significance thresholds to determine air quality impacts in the immediate vicinity. Therefore, when revising the air quality analysis for the proposed project, it is recommended that the Lead Agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing localized and regional air quality analyses can be found at: <http://www.aqmd.gov/ceqa/hdbk.html>

**6-1
Cont.**

Air Quality and GHG Mitigation Measures

In the event that the Lead Agency finds any significant localized air quality impacts from the proposed project the SCAQMD staff recommends that the Lead Agency provide additional mitigation measures to minimize the project's significant localized construction and operational air quality impacts pursuant to Section 15126.4 of the CEQA Guidelines. A list of potential construction related air quality mitigation measures is available at: http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Further, the Lead Agency determined that the project will result in significant GHG impacts; therefore, the SCAQMD staff recommends that the following mitigation measures be included in the final EIR pursuant to Section 15126.4 of the CEQA Guidelines.

6-2

Additional Operational GHG Mitigation Measures – Transportation

- a) Provide electric car charging stations for tenants. Also, provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
- b) Provide electric car charging stations for tenants. Also, provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
- c) Provide incentives for employees and the public to use public transportation such as discounted transit passes and/or other incentives.
- d) Create local “light vehicle” networks, such as neighborhood electric vehicle (NEV) systems.
- e) Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

Additional Operational GHG Mitigation Measures - Other

- f) Require use of electric lawn mowers and leaf blowers.
- g) Require use of electric or alternatively fueled sweepers with HEPA filters.
- h) Require the use of electric or alternative fueled maintenance vehicles.

SCAQMD Permits

The proposed project includes an upgraded cogeneration power plant that requires SCAQMD permits. Therefore, SCAQMD staff recommends that the final EIR include

6-3

additional discussion regarding the permits and emissions controls required for the proposed project. For example, the final EIR should elaborate on the storage and transfer of ammonia in the event that it will be used for emissions control equipment.

**6-3
Cont.**

Contact Information

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



for Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

[MK:DG](#)

SBC130913-02
Control Number

Letter 7



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

October 29, 2013

Guillermo Arreola
City of Loma Linda
25541 Barton Road
Loma Linda, CA 92354

Subject: Loma Linda University Health (LLUH) Master Plan Project
SCH#: 2013051043

Dear Guillermo Arreola:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 28, 2013, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

7-1

7-2

**Document Details Report
State Clearinghouse Data Base**

SCH# 2013051043
Project Title Loma Linda University Health (LLUH) Master Plan Project
Lead Agency Loma Linda, City of

Type EIR Draft EIR
Description Proposed facilities and improvements associated with the Master Plan include: 1) a seven-story, approximately 250,000 sf, 760-space patient and visitor parking structure; 2) a 13-story (approximately 215 feet in height), approximately 732,000 sf hospital with 464 beds to replace a portion of the seismically-noncompliant existing hospital, and 80 parking spaces; 3) an approximate 34,000 sf new or retrofitted utility plant; 4) an approximate 14,000 sf Southern CA Edison (SCE) upgraded on-site or new off-site electrical substation; 5) a two-story, approximately 9,000 sf addition to the existing dental school; 6) a four-story approximately 90,000 sf research building; and 7) tenant improvements and reuse of the vacated portions of the existing hospital.

Lead Agency Contact

Name Guillermo Arreola
Agency City of Loma Linda
Phone (909) 799-2830 **Fax**
email
Address 25541 Barton Road
City Loma Linda **State** CA **Zip** 92354

Project Location

County San Bernardino
City Loma Linda
Region
Lat / Long 34° 2' 56.9" N / 117° 15' 49.2" W
Cross Streets Barton Road/Anderson Street
Parcel No. Multiple
Township 1S **Range** 4W **Section** 25,26 **Base** SBB&M

Proximity to:

Highways I-10
Airports No
Railways Union Pacific RR
Waterways San Timoteo Creek
Schools Loma Linda University
Land Use LU: Health Care, Institutional and Special Planning Area B. The Project Site and City Park is zoned Institutional.

Project Issues Air Quality; Archaeologic-Historic; Geologic/Seismic; Public Services; Traffic/Circulation; Water Quality; Cumulative Effects; Aesthetic/Visual; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Water Supply; Landuse

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 6; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 8; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 8; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; Statewide Health Planning

Date Received 09/12/2013 **Start of Review** 09/12/2013 **End of Review** 10/28/2013

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard
West Sacramento, CA 95691
(916) 373-3715
(916)-373-5471 --FAX
e-mail: ds_nahc@pacbell.net

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STATE CLEARING HOUSE

September 17, 2013

Mr. Guillermo Arreola

City of Loma Linda Community Development

Department: Planning Division

25541 Barton Road
Loma Linda, CA 92354

RE: SCH#20130051043 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the **"LOMA LINDA UNIVERSITY HEALTH MASTER PLAN PROJECT"** located in the City of Loma Linda; San Bernardino County, California

Dear Mr. Arreola:

The Native American Heritage Commission (NAHC) has reviewed the CEQA Notice regarding the above referenced project. In the 1985 Appellate Court decision (170 Cal App 3rd 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

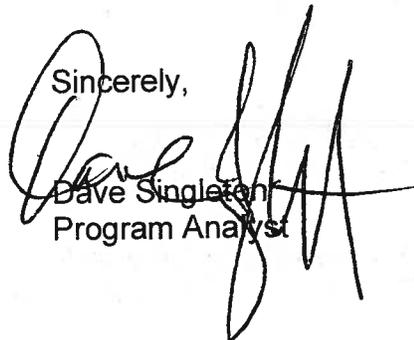
If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to

the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans. Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,



Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list