

**CALIFORNIA ENVIRONMENTAL QUALITY ACT
FINDINGS IN CONNECTION WITH APPROVAL OF THE
IRVINE CAMPUS MEDICAL COMPLEX PROJECT,
UNIVERSITY OF CALIFORNIA, IRVINE CAMPUS**

I. INTRODUCTION

The California Environmental Quality Act (CEQA) (Public Resources Code (“PRC”) Sections 21000 et seq. (“CEQA”) and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000 et seq.) require that written findings be made by the lead agency in connection with certification of an Environmental Impact Report (“EIR”) prior to approval of the project pursuant to PRC Section 21081 and Sections 15091 and 15093 of the CEQA Guidelines. This document provides the findings required by CEQA for approval of the Irvine Campus Medical Complex (ICMC) and LRDP Amendment #3 (“Project”) and certification of the Subsequent EIR (“SEIR”) for the Project.

The SEIR was prepared to identify and analyze the environmental impacts associated with implementation of the proposed Project, as well as feasible mitigation measures and alternatives to reduce or avoid the Project’s significant effects. The SEIR has been prepared in conformance with CEQA and the CEQA Guidelines, and with the University of California (University) procedures for implementing CEQA. The lead agency (“UC Irvine” or “UCI”) is required to consider the information and analysis in the SEIR, along with any other relevant information, in making its decisions on the proposed Project.

A. Project Description Summary and Project Design

The Project site is a part of the UCI campus located in the City of Irvine, County of Orange, California. The 14.5-acre project site is located within the 144-acre North Campus sector. The North Campus is approximately 1.5 miles from the Academic Core and is physically separated from the Main Campus by University Drive, San Diego Creek, and the UC San Joaquin Marsh Reserve. The Project Site includes both the Development Area (where the Project will be constructed) and 150-foot Buffer Area (where no permanent improvements are proposed). The Buffer Area separates the San Joaquin Marsh Reserve from the Development Area. The North Campus is generally bordered by Jamboree Road on the northwest, Campus Drive on the northeast, the UC San Joaquin Marsh Reserve to the south, and MacArthur Boulevard to the west.

As proposed, the Project would construct an integrated medical campus providing inpatient, ambulatory, and emergency care services space to meet community needs. *Table 1: ICMC Project Summary*, provides a summary of the proposed on-site land uses. The Project would include an Acute Care Hospital with up to 144 beds, Ambulatory Care Center, free-standing parking structure and surface parking areas, and a Central Utility Plant.

The project would be oriented around a central arrival court on the northeast area of the site, near the Birch Street access road and the proposed Center for Child Health Esplanade Drive. The patient care facilities (Acute Care Hospital and Ambulatory Care Center) would be located in the southeastern area of the site, overlooking the San Joaquin Marsh, to take advantage of the views

**IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021**

into this natural area. The parking structure and Central Utility Plant would be located in the northwestern area of the site, along the proposed Esplanade Drive. This organization allows the separation of emergency vehicular traffic from the visitor and patient traffic.

Acute Care Hospital

The Acute Care Hospital would be an OSHPD 1 facility. OSHPD 1 facilities include general acute care hospitals, acute psychiatric hospitals, and general acute care hospitals providing only acute medical rehabilitation center services. A hospital campus may consist of a number of structures, some under OSHPD jurisdiction with the rest under the jurisdiction of the local building authorities.

Table1: ICMC Project Summary		
Use	Size and Capacity	No. of Floors
Acute Care Hospital (OSHPD 1)	<ul style="list-style-type: none"> ▪ 350,000 gsf ▪ 96-144 Beds ▪ Diagnostic and treatment spaces 	<ul style="list-style-type: none"> ▪ 6 stories plus basement
Ambulatory Care Center (OSHPD 3)	<ul style="list-style-type: none"> ▪ 225,000 gsf 	<ul style="list-style-type: none"> ▪ 6 stories plus basement
Central Utility Plant (OSHPD 1)	<ul style="list-style-type: none"> ▪ 37,000 gsf ▪ Approximately 2,750 tons of chilling and heating capacity. 	<ul style="list-style-type: none"> ▪ 3 stories
Parking Structure	<ul style="list-style-type: none"> ▪ 1,400 stalls 	<ul style="list-style-type: none"> ▪ 6 levels above ground ▪ 2 levels below ground
<small>OSHPD = Office of Statewide Health Planning and Development; gsf = gross square feet Source: Irvine Campus Medical Complex Detailed Project Program, 2020.</small>		

Ambulatory Care Center

The Ambulatory Care Center would be an OSHPD 3 facility. While OSHPD is responsible for proposing the building standards for licensed clinics, the authority for review, permitting, and construction inspection of “outpatient clinical services,” “primary-care clinics”, and “specialty clinics” is typically under the jurisdiction of the local (UCI) building official.

Central Utility Plant

An OSHPD-compliant Central Utility Plant would be constructed to provide thermal energy service to the Project. Heated hot water, chilled water and steam, as well as back-up power generation would be supplied to the building. The Central Utility Plant would be located adjacent and southwest of the Parking Structure. The Central Utility Plant would include electric heat-recovery chillers, cooling towers, boilers, and electrical generators to provide chilling and heating energy services to the proposed Project.

Parking

Parking Structure

The majority of patient, staff, and visitor parking would be provided in a free-standing parking structure located on the northern edge of the site. The Parking Structure would have

IRVINE CAMPUS MEDICAL COMPLEX

CEQA FINDINGS

January 20, 2021

approximately 1,400 parking spaces with six levels of parking above grade and two levels of parking below grade. The structure is designed to accommodate a canopy-mounted photovoltaic array on the top level of the parking structure to produce renewable energy to serve the Project.

Vehicle access to the parking structure would occur from Esplanade Drive, via the Birch Street and West Access Road entrances on Jamboree Road. Patients and visitors would primarily use the Birch Street access and staff would use both the Birch Street and West Access Drive to enter the Parking Structure.

Surface Parking

Additional visitor parking, short-term parking, service parking, and drop-off areas would be provided in surface parking areas distributed throughout the Development Area of the Project Site.

A temporary, unpaved surface lot would be installed within the existing UCI Support Services Facilities area to accommodate displaced spaces due to Project demolition. These spaces would be utilized by UCI Support Services Facilities.

B. Project Objectives

Powered by discovery and innovation, UCI Health's vision is to advance individual and population health. This focus on meeting the evolving needs of the community and responding to the changing healthcare environment necessitates expanding care access and health education. The proposed Project is aligned with UC Irvine Health's strategic planning goals and objectives, including the following:

- Ensure appropriate and adequate access to high-quality health and wellness care to the community through a convenient location in central Orange County.
- Leverage the co-location of UCI Health research, teaching, inpatient and outpatient programs through a location on the Irvine Campus.
- Develop a campus setting providing a full range of on-site health and wellness services.
- Serve as the destination provider for distinctive health care service lines.
- Provide unparalleled quality and value to patients and healthcare customers.
- Provide a site location with high-quality open space connections to provide an environment that promotes healing and wellness.
- Support the stewardship of adjacent UCI open space resources.
- Goal to achieve LEED Gold equivalence or better and building efficiency standards that exceed California's Title 24 2019 energy code (outpatient) and ASHRAE 90.1-2010 (inpatient) standards.
- Contribute to campus-wide targets related to fossil fuel reduction, water efficiency, waste reduction, and transportation.

II. PROCEDURAL COMPLIANCE WITH CEQA

A. Publication and Review of the Draft and Final SEIR

**IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021**

UCI published and circulated a Notice of Preparation of the ICMC DSEIR on February 28, 2020. UCI received seven formal comment letters during the 30-day public scoping period. The ICMC DSEIR was circulated for a 45-day review and comment period by agencies and the public, which began on October 2, 2020, and ended on November 16, 2020. The ICMC DSEIR, technical appendices, and 2007 LRDP EIR were posted online at:

<https://cpep.uci.edu/environmental/review.php>.

Due to the COVID-19 pandemic, paper copies of the DSEIR were available by contacting UCI staff to schedule an appointment.

The Final Subsequent Environmental Impact Report (“FSEIR”) includes minor revisions to the DSEIR that incorporate clarifications developed in responses to comments on the DSEIR, and that reflect revisions made to the design of the Project, as described in these Findings and in the FSEIR. The FSEIR also includes responses to all written comments received during the comment period as well as oral comments made at both public hearings. The FSEIR was completed on January 8, 2021, and made available at that time to all responsible agencies and the public online at: <https://cpep.uci.edu/environmental/review.php>.

B. Certification

Pursuant to CEQA Guidelines Section 15090(a), the University certifies that:

- (1) The ICMC SEIR has been completed in compliance with CEQA;
- (2) The ICMC SEIR was presented to the University and the University has reviewed and considered the information contained in the FSEIR prior to approving the Project; and
- (3) The ICMC SEIR reflects the University’s independent judgment and analysis.

III. EXISTING ENVIRONMENTAL DOCUMENTATION

A. 2007 LRDP EIR

In November 2007, the Regents of the University of California (Regents) adopted the 2007 LRDP for the University of California Irvine (UCI) campus, which outlines projected development levels and patterns for UCI at all of its main campus sites through the year 2026. The 2007 LRDP Final EIR (FEIR) was certified by the Regents in November 2007 and includes, among other things, analysis of the potential environmental impacts from then-envisioned approximately 435 residential units and 950,000 gross square feet of mixed-use development in the North Campus. Subsequently, in June 2018 a minor amendment to the LRDP, Amendment #1, was approved to add Clinical uses as a Primary Use to the North Campus' Mixed Use - Commercial land use designation.

Amendment #1 to the 2007 LRDP was approved by the University in June 2018 through a Notice of Exemption based on Section 15061(b)(3)) of the State CEQA Guidelines. The Notice of Exemption concluded that Amendment #1 was exempt because:

All buildout assumptions for the North Campus in the 2007 LRDP, including the allotted

IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021

950,000 GSF for "Office/Research & Development" and 13,364 average daily trips (ADT) that were analyzed within the associated 2007 LRDP Environmental Impact Report (EIR), would not be modified due to the Administrative Clarification. As such, no additional impacts beyond what was previously analyzed in the 2007 LRDP EIR would occur. Any subsequent projects sited on the North Campus would have a project-specific environmental analysis prepared pursuant to CEQA.

B. Tiering from the 2007 LRDP EIR

The 2007 LRDP EIR indicated that projects implementing the 2007 LRDP would be examined to determine whether subsequent project-specific environmental documents are required. The University's use of the 2007 LRDP and 20007 LRDP EIR in project review was specifically addressed in the introduction of 2007 LRDP EIR (page 1-6), which states:

With respect to future UCI development projects that could be proposed during the 2007 LRDP planning horizon (up to 2025-26), CEQA and CEQA Guidelines state that subsequent projects should be examined in light of the Program EIR to determine whether project specific actions are consistent with the LRDP and additional environmental documentation must be prepared. If no new significant effects would occur, all significant effects have been adequately addressed, and no new mitigation measures would be required, the subsequent projects within the scope of the approved LRDP could rely on the environmental analysis provided in the Program EIR, and no additional environmental analysis would be required; otherwise, subsequent environmental analysis must be prepared. The subsequent analysis may rely on the Program EIR, as appropriate, for general discussions, some analysis, and cumulative impacts, but would be tiered to allow the subsequent analysis to focus on more project- and site-specific impacts not covered in the Program EIR. In either case, appropriate documentation would be prepared pursuant to CEQA and CEQA Guidelines for subsequent projects.

Based on this guidance, and on the requirements of CEQA and the CEQA Guidelines as discussed below, UCI determined that a subsequent EIR tiered from the 2007 LRDP EIR was the appropriate environmental document for the Project.

CEQA Guidelines Section 15162 sets forth the circumstances under which a project may warrant a subsequent EIR. Specifically, a lead agency shall prepare a subsequent EIR if any of the conditions described in Section 15162 requiring a further EIR are found. With respect to tiering from the 2007 LRDP EIR, CEQA and the CEQA Guidelines encourage the use of tiered environmental documents to eliminate repetitive discussion of the same issues. According to Section 15152 of the CEQA Guidelines "[t]iering refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on issues specific to the later project." Therefore, this ICMC SEIR is tiered from the 2007 LRDP EIR. Readers should review this document in conjunction with the 2007 LRDP EIR and Amendment #3 thereto, which fully analyze all of the potential environmental impacts of the 2007 LRDP.

IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021

C. Relation of the Proposed Action to the 2007 LRDP EIR

As described above, the 2007 LRDP EIR provides a comprehensive program-level analysis of the environmental effects of implementing the 2007 LRDP, in accordance with Section 15168 of the CEQA Guidelines. The Project will implement a portion of the 2007 LRDP, which establishes a long-term development program for land use zones occupied by University facilities.

The Project will be located in the area designated as the North Campus. In the area governed by the 2007 LRDP, which includes the Project Site, UCI anticipated over 950,000 net new GSF of development and 435 residential units on approximately 46 acres of the 144-acre North Campus sector during the 2007 LRDP timeframe, which was analyzed in the 2007 LRDP EIR (2007 LRDP EIR, SCH No. 2006071024). The 2007 LRDP anticipates development within the North Campus to focus on mixed-use development consisting of both commercial and residential components. A primary objective 2007 LRDP is to implement development that represents the best possible relationship between UCI's academic goals, the character of the site, and proper integration with the surrounding community.

The new ICMC will be consistent with the 2007 LRDP's vision of increasing space for campus programs on the North Campus. The Project is consistent with the North Campus development program identified in the 2007 LRDP which allows 950,000 gross square feet (gsf) of development and 435 residential units on approximately 46 acres of the 144-acre North Campus sector. While the Project is consistent with the intent of the North Campus development program, the Project proposes a land use amendment to the 2007 LRDP to allow Inpatient Uses to Mixed Use – Commercial. This designation would allow inpatient uses as well as the other proposed uses on the site. Inpatient services refer to specialized treatment and recovery and may include one or more overnight stays. UCI remains below the 950,000 GSF development capacity with the 612,000 GSF proposed for the ICMC project. Therefore, the Project will not cause an exceedance of overall development anticipated in the 2007 LRDP.

IV. ENVIRONMENTAL ANALYSIS

The Project is consistent with the North Campus development program identified in the 2007 LRDP which allows 950,000 gross square feet (gsf) of development and 435 residential units on approximately 46 acres of the 144-acre North Campus sector. While the Project is consistent with the intent of the North Campus development program, the Project proposes a land use amendment to the 2007 LRDP to allow Inpatient Uses to Mixed Use – Commercial. This designation would allow inpatient uses as well as the other proposed project uses on the site. Inpatient services refer to specialized treatment and recovery and may include one or more overnight stays. The analysis in the ICMC SEIR demonstrates that the ICMC does not create new or more significant impacts on resources that were evaluated in the 2007 LRDP EIR with the exception of impacts on greenhouse gas emissions, cultural resources and tribal cultural resources. New information with regard to the methodologies in which these resources were evaluated in the 2007 LRDP EIR have been applied to the evaluation of these resources. As such, additional mitigation measures were added to reduce potential greenhouse gas emissions to less than significant and potential impacts, direct and cumulative, were identified for cultural resources and tribal cultural resources.

**IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021**

V. ENVIRONMENTAL IMPACTS AND FINDINGS

Pursuant to Public Resources Code Section 21081 and CEQA Guidelines Section 15091, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless the public agency makes one or more of the following findings with respect to each significant impact:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

The University has made one or more of these specific written findings regarding each significant impact associated with the Project. Those findings are presented below, along with a presentation of facts in support of the findings. Concurrent with the adoption of these findings, the University adopts the Mitigation Monitoring and Reporting Program (“MMRP”).

The ICMC SEIR evaluation included a detailed analysis of impacts in 17 environmental disciplines, analyzing the Project and alternatives, including a No Project Alternative. The ICMC SEIR discloses the environmental impacts expected to result from the construction and operation of the Project. Where possible, mitigation measures were identified to avoid or minimize significant environmental effects. In addition, all relevant continuing best practices and 2007 LRDP EIR mitigation measures are incorporated in the Project analysis and will be implemented as a part of the Project and monitored through the MMRP approved for the Project.

1. Aesthetics

The 2007 LRDP EIR determined that buildout of the 2007 LRDP, which will incorporate design provisions of the 2007 LRDP and mitigation measures relating to light and glare, will not result in significant aesthetic impacts (2007 LRDP EIR Vol 1, p. 4.1-6 to 4.1-16), nor will the project-level implementation of the 2007 LRDP make a cumulatively considerable contribution to adverse aesthetic impacts (2007 LRDP EIR Vol 1, p. 4.1-17 to 4.1- 18). The University finds that the Project will not change the less than significant impact conclusions reached in the 2007 LRDP EIR related to scenic vistas, scenic resources, and light and glare associated with implementation of the 2007 LRDP. Implementation of Mitigation Measures AES-1 and AES-2 from the ICMC DSEIR (Volume I, page 3.1-14) will implement the mitigation measures from the 2007 LRDP EIR. The ICMC DSEIR concludes that with implementation of Mitigation Measures AES-1 and AES-2, potential light and glare impacts would be mitigated to a less than significant impact. Mitigation Measures AES-1 and AES-2 are hereby adopted and incorporated into the Project. Therefore, the University finds that the Project will not result in significant impacts related to

IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021

aesthetics, that these impacts will be consistent with the 2007 LRDP EIR's analysis, and no new mitigation measures are necessary.

2. Air Quality

For the reasons stated in the ICMC SEIR, the University finds that the Project will not result in significant impacts related to air quality, and the environmental impacts resulting from the Project are within the scope of the 2007 LRDP EIR analysis. One new mitigation measure to ensure emissions from diesel generators are minimized is included.

The 2007 LRDP EIR concluded that projects implementing the 2007 LRDP, guided by compliance with regulations, campus policies, and programs to reduce emissions would not result in new significant air quality impacts (2007 LRDP EIR Vol 1 p. 4.2-12 to 4.2-20). With implementation of mitigation measures and continuing best practices in the 2007 LRDP EIR, the University finds that the Project will not result in impacts on air quality. The University finds that the Project will not change the less than significant impact conclusions reached in the 2007 LRDP EIR related to conflicts with an air quality plan, ambient air quality standards, sensitive receptors, objectionable odors, and cumulative impacts associated with implementation of the 2007 LRDP. Implementation of Mitigation Measures AQ-1 and AQ-2 from the ICMC DSEIR (Volume I, page 3.1-25 to 3.1-27) will implement the mitigation measures AQ-2B and 2C from the 2007 LRDP EIR.

An additional mitigation measure, Mitigation Measure AQ-3, was added to the ICMC project to ensure that the emergency back-up diesel generators for the proposed hospital meet the latest Verified Diesel Emission Control Strategy from the California Air Resources Control Board (Volume I, page 3.2-27). The ICMC DSEIR concludes that with implementation of Mitigation Measures AQ-1 through AQ-3, potential air quality impacts would be mitigated to a less than significant impact. Mitigation Measures AQ-1 AQ-2, and AQ-3 are hereby adopted and incorporated into the Project. Therefore, the University finds that the Project will not result in significant impacts related to air quality, these impacts will be consistent with the 2007 LRDP EIR's analysis.

3. Biological Resources

The 2007 LRDP EIR concluded that projects implementing the 2007 LRDP, incorporating existing best practices and 2007 LRDP EIR mitigation measures, will not result in new significant impacts upon biological resources (2007 LRDP EIR Vol 1, p. 4.3-35 to 4.3-52). The Project Site (which includes the Development Area and 150-foot Buffer Area) is in the North Campus Planning Sector, which is an area adjacent to urbanized development along Jamboree Road to the north and the UC San Joaquin Marsh Reserve to the south. The 150-foot Buffer Area exists between the UC San Joaquin Marsh Reserve and the Development Area and no structural improvements will be allowed in the Buffer Area. The land use designation for the Development Area within the 2007 LRDP is Mixed Use – Commercial. The Development Area and the adjacent temporary laydown area consists of mostly disturbed habitat and developed space. However, the Development Area could support wildlife species despite its mostly disturbed

IRVINE CAMPUS MEDICAL COMPLEX

CEQA FINDINGS

January 20, 2021

nature. As such, the ICMC SEIR will implement Mitigation Measures BIO-1 through BIO-4 which require pre-construction surveys by a qualified biologist to determine if sensitive species or nesting birds are present. Specifically, focused wildlife clearance survey for special-status wildlife species including least Bell's vireo, coastal California gnatcatcher, White-tailed kite, orange-throated whiptail, western mastiff bat, and western pond turtle are required. If special status species are present then Mitigation Measure BIO-2 requires specific performance standards to be met to avoid taking or harming the sensitive species. Additionally, by implementing mitigation measures BIO-1 through BIO-4, the University will implement mitigation measure BIO-2B in the 2007 LRDP EIR, which requires pre-construction surveys. The project also implements mitigation measure BIO-3D from the 2007 LRDP EIR by providing more than a 50-foot setback from wetland areas. No additional sensitive plant or animal species are known to, or likely to, occur at the Project Site. Mitigation Measures BIO-1 BIO-2, and BIO-3, and BIO-4 are hereby adopted and incorporated into the Project. The University finds that the Project will not change the less than significant impact conclusions reached in the 2007 LRDP EIR related to special status species, riparian habitats and other sensitive natural communities, wetlands, wildlife management corridors, local biological resource protection and cumulative impacts associated with implementation of the 2007 LRDP.

Therefore, the University finds that the Project will not result in significant impacts related to biological resources, potential impacts are consistent with the 2007 LRDP EIR's analysis.

4. Cultural Resources

The 2007 LRDP EIR concluded that projects implementing the 2007 LRDP, incorporating existing best practices and 2007 LRDP EIR mitigation measures, will not result in new significant impacts upon cultural resources (2007 LRDP EIR Vol 1 p. 4.4-12 to 4.4-18). The 2007 LRDP EIR concluded that archeological resources, historical resources, human remains, and cumulative impacts would be less than significant, and no mitigation is required.

Subsequent analysis conducted as part of the ICMC SEIR concluded that the previously identified site P30-000115/CA-ORA-115 may contribute to an understanding of Native American subsistence strategies during this period based on the presence of datable carbon and artifacts suggestive of discrete activities within the site. A portion of P30-000115/CA-ORA-115 (approximately 0.8 acre) located within the 150-foot Buffer Area will be preserved in place and no development or disturbance would occur in that area. Additionally, due to the Project site location in comparison to P30-000115/CA-ORA-115 locations outside of the Project Site boundaries, a majority of remaining undisturbed resource site is avoided and will not be disturbed by the Project. Any future development in this location will be required to undergo a separate CEQA analysis in which potential impacts on this portion of Locus B would be evaluated.

Site P30-000115/CA-ORA-115 would be directly impacted by the proposed Project. Due to the likelihood of archaeological resources present, Project-specific Mitigation Measure CUL-1 would be implemented which outlines a Data Recovery Plan. The Data Recovery Plan is the systematic recovery of site data, including artifacts, stratigraphy, and cultural features. Should resources related to Tribal Cultural Resources be discovered, a management plan involving consulting Native American tribes and Tribal Monitors would be implemented consistent with Mitigation Measure TCR-1. Data recovery is required within the archaeological site but must also take into

IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021

consideration areas within the Project area that are mapped outside the current archaeological site boundaries. Implementation of this mitigation measure is consistent with UCI's 2007 LRDP EIR Mitigation Measure Cul-1B.

After data recovery of the known site, there is a possibility that archaeological remains could occur beneath the ground surface within other areas of the Project site (2007 LRDP EIR, page 4.4-4). Earthmoving activities could possibly uncover previously undetected archaeological remains associated with prehistoric cultures, and a loss of a significant archaeological resource could result if such materials are not properly identified. Therefore, implementation of Mitigation Measure CUL-2 would require monitoring by a qualified archaeologist during earthwork, which would reduce potential impacts due to any unknown archaeological resources. Should resources related to Tribal Cultural Resources be discovered, a management plan involving consulting Native American tribes and Tribal Monitors would be implemented consistent with Mitigation Measure TCR-1. Implementation of this mitigation measure is consistent with UCI's 2007 LRDP EIR Mitigation Measure Cul-1C.

However, because Project implementation would destroy the resource and because the cultural resource site covers the majority of the Developable Area, preservation in place is limited to a small area within the 150-foot Buffer Area. As such, the impact on cultural resources is considered a significant and unavoidable impact.

Future ground-disturbing activities during grading and construction activities could encounter buried human remains that were not identified during the cultural resource report conducted for the proposed Project. This could result in damage to unknown, buried human remains and mitigation would be required. Mitigation Measures CUL-3 and TCR-1 identify procedures for recording and treating any human remains should they be discovered during Project construction. The measure requires that remains be protected, preserved, and treated in accordance with applicable laws, regulations and guidelines. With the implementation of Mitigation Measures CUL-3 and TCR-1, potential impacts would be less than significant.

With regard to cumulative impacts, despite the site-specific nature of the resources, mitigation required for the identification and protection of unknown or undocumented resources may result in cumulative impacts. The proposed Project would cumulatively contribute to a potentially significant impact.

Mitigation Measures CUL-1, CUL-2, CUL-3, and TCR-1 are hereby adopted and incorporated into the Project. Nonetheless, the University finds even with implementation of these measures, significant unavoidable impacts will occur as described above. Therefore, the University finds that specific economic, legal, social, technological, or other considerations make it infeasible to reduce this impact to a less than significant level.

5. Energy

The 2007 LRDP EIR did not evaluate potential impacts on energy conservation as an independent EIR chapter. Some consideration to efficient energy use was indirectly discussed in Chapter 5.3.3.1 with regard to UCI emission reduction strategies as they relate to global climate change (2007 LRDP EIR Vol 1 p.5-9). The 2007 LRDP EIR concluded that the emission

**IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021**

reduction strategies included in the 2007 LRDP would contribute to a less than significant impact on climate change. The ICMC SEIR concluded that the proposed project would have less than significant impacts from energy consumption, conflicts with a State or local energy plan, or cumulative energy impacts. No new mitigation measures are required.

6. Geology, Seismicity, and Soils

The 2007 LRDP EIR concluded that projects implementing the 2007 LRDP, incorporating existing best practices and 2007 LRDP EIR mitigation measures, will not result in new significant impacts in the areas of geology, seismicity, or soils (2007 LRDP EIR Vol 1 p. 4.5-8 to 4.5-12). With regard to potential impacts associated with soil erosion or topsoil loss, the ICMC SEIR includes the implementation of Mitigation Measures AQ-1, HYD-1, HYD-2, and HYD-3 from the air quality and hydrology sections. The ICMC SEIR concludes that implementation of these mitigation measures would reduce potential impacts to less than significant because these measures include construction, design, and operational features to control dust and surface water runoff.

Additionally, the ICMC SEIR incorporates mitigation measures Cul-4A, Cul-4B, and Cul-4C from the 2007 LRDP EIR. Mitigation measures GEO-1, GEO-2, and GEO-3 in the ICMC SEIR specifically address unknown paleontological resources that may be discovered during mass grading activities during the initial construction phase. The University finds that implementation of these measure will reduce potential impacts on paleontological resources because the mitigation measures provide specific performance standards for monitoring, testing and recovery should paleontological resources be discovered.

Mitigation Measures GEO-1 GEO-2, and GEO-3 are hereby adopted and incorporated into the Project. Therefore, the University finds that the Project will not result in significant impacts related to geology, seismicity, soils, paleontological resources, and cumulative impacts and these impacts will be consistent with the 2007 LRDP EIR's analysis, and no new mitigation measures are necessary.

7. Greenhouse Gas (GHG) Emissions

The 2007 LRDP EIR did not evaluate potential impacts from greenhouse gas emissions as an independent EIR chapter. Greenhouse gas emissions were discussed in Chapter 5.3.3 with regard to UCI emission reduction strategies as they related to global climate change (2007 LRDP EIR Vol 1 p.5-8). However, there were no adopted thresholds for greenhouse gas emissions at the time the 2007 LRDP EIR was prepared. The 2007 LRDP EIR concluded that the emission reduction strategies included in the 2007 LRDP would contribute to a less than significant impact on climate change.

The ICMC SEIR concluded that the proposed Project demonstrates consistency with the 2007 LRDP, UCI Climate Action Plan goals, and would not conflict with any applicable plan, policy, or regulation of an agency adopted to reduce greenhouse gas emissions, including Title 24, AB 32, and SB 32. Mitigation measure GHG-1 requires the Project to minimize greenhouse gas emissions through onsite solar facilities and carbon offsets consistent with the UCI CAP and the UC Policy on Sustainable Practices with the goal of achieving carbon neutrality on a campus-

IRVINE CAMPUS MEDICAL COMPLEX

CEQA FINDINGS

January 20, 2021

wide basis. Additionally, mitigation measures AQ-2 requires TDM measures such as incentives for ridesharing programs and public transit, promotion of bus service in the vicinity of the campus, expansion of campus shuttle and other campus transit systems, expansion of UCI bike programs, and support of alternative transportation organizations which help reduce greenhouse gas emissions.

Mitigation Measure GHG-1 is hereby adopted and incorporated into the Project. For the reasons stated in the ICMC SEIR, the University finds that the Project will not result in significant impacts related to greenhouse gas emissions. Therefore, Project impacts will be less than significant.

8. Hazardous Materials

The 2007 LRDP EIR concluded that projects implementing the 2007 LRDP, incorporating existing best practices and 2007 LRDP EIR mitigation measures, will not result in new significant impacts in the (2007 LRDP EIR Vol 1 p. 4.6-21 to 4.6-39). The 2007 LRDP EIR concluded that the transport, use, and disposal of hazardous materials, accidental releases, hazards to nearby schools, listed hazardous materials sites, and hazards from nearby airports would be less than significant and no mitigation is required. The 2007 LRDP EIR included mitigation measures HAZ 6A, which requires notification of emergency response providers of road closures.

Subsequent analysis conducted as part of the ICMC SEIR concluded that hazardous materials are located within the soil and groundwater under the Project Site as a result of contaminant migration from offsite sources. As such, the ICMC SEIR includes mitigation measures HAZ-1, HAZ-2, and HAZ-4 (ICMC SEIR p. 3.8-14 to 3.8-15) to reduce potential impacts associated with the accidental release of hazardous materials during construction. These mitigation measures reduce potential impacts because they provide specific performance measures for remediating contaminated soils such as testing of soils vapor encroachment conditions and installing a soil vapor barrier if the testing determines a barrier is warranted. The mitigation also requires the preparation and implementation of a soil remediation and management plan, and the preparation of a report by a qualified environmental professional documenting the presence or lack thereof of asbestos-containing materials (ACMs), lead-based paint, polychlorinated biphenyls (PCBs), and any other building materials or stored materials classified as hazardous materials by State or federal law. The proper removal and disposal of the hazardous materials must be documented. The ICMC SEIR includes HAZ-4 which implements mitigation measures 6-A from the 2007 LRDP EIR.

Mitigation Measures HAZ-1 HAZ-2, HAZ-3, and HAZ-4 are hereby adopted and incorporated into the Project. For the reasons stated in the ICMC SEIR, the University finds that the Project will not result in significant impacts related to hazardous materials, and the environmental impacts resulting from the Project are within the scope of the 2007 LRDP EIR analysis. Required adherence to applicable existing rules and regulations affecting the storage, use and transport of hazardous chemicals and continuing best practices in the 2007 LRDP EIR will avoid new or significant hazardous materials-related impacts not analyzed in the 2007 LRDP EIR.

9. Hydrology and Water Quality

**IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021**

The 2007 LRDP EIR concluded that projects implementing the 2007 LRDP, incorporating existing best practices and 2007 LRDP EIR mitigation measures, will not result in new significant impacts in hydrology and water quality impacts (2007 LRDP EIR Vol 1, p. 4.7- 16 to 4.7-28). Construction-related impacts will not be significant due to required adherence to applicable existing rules and regulations affecting stormwater runoff, associated pollutants, water quality standards, and water discharge requirements. The 2007 LRDP EIR included mitigation measures HYD-1A, HYD-2A, and HYD-2B to mitigate drainage and hydrology and water quality.

The University finds that the design and construction of the Project will be performed in conformance with the 2007 LRDP, and the Project will incorporate hydrology and water quality-related mitigation measures and continuing best practices in the 2007 LRDP EIR. With regard to potential impacts associated with water quality impacts, the ICMC SEIR includes the implementation of Mitigation Measures HYD-1, HYD-2, and HYD-3. The ICMC SEIR concludes that implementation of these mitigation measures would reduce potential impacts to less than significant on water quality, groundwater recharge, drainage and hydrology, and flood hazards because these measures include construction, design, and operational features to control surface water runoff, and treat surface water before leaving the Project Site.

Subsequent analysis conducted as part of the ICMC SEIR concluded a small portion of the southern Development Area and the southeasterly portion of the proposed temporary staging area on the Arboretum site is within the area mapped as Zone A on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) map, which generally means that these areas are subject to flooding by a 100-year storm event; however, a base flood elevation has not been established for this area, because a detailed hydraulic analysis for the site has not been performed. As such, the proposed Project would require approval of Conditional Letter of Map Revision (CLMOR) from FEMA as a portion of the development area would be located within this floodplain area. As such, implementation of Mitigation Measure HYD-4 is required to establish a base flood elevation for this site and to have the Zone A floodplain designation removed from the building area within the Development Area.

Mitigation Measures HYD-1 HYD-2, HYD-3, and HYD-4 are hereby adopted and incorporated into the Project. Therefore, the University finds that the Project will not result in significant impacts related to hydrology and water quality, and the environmental impacts resulting from the Project are within the scope of the 2007 LRDP EIR analysis.

10. Land Use

The 2007 LRDP EIR concluded that projects implementing the 2007 LRDP, incorporating existing best practices and 2007 LRDP EIR mitigation measures, will not result in new significant land use impacts (2007 LRDP EIR Vol 1, p. 4.8-15 to 4.8-22). The University finds that the Project will be consistent with the 2007 LRDP's development assumptions with approval of a minor 2007 LRDP amendment to accommodate inpatient care for the Project. The Project will also be consistent with applicable 2007 LRDP objectives. Therefore, the University finds that the Project will not result in significant impacts related to land use, and the environmental impacts resulting from the Project are within the scope of the 2007 LRDP EIR analysis. No new mitigation measures are required.

IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021

11. Noise

The 2007 LRDP EIR concluded that projects implementing the 2007 LRDP, incorporating existing best practices and 2007 LRDP EIR mitigation measures, will not result in new significant impacts in the areas of permanent noise increases, temporary noise increases, aircraft noise, groundbourne vibrations, and cumulative impacts (2007 LRDP EIR Vol 1 p. 4.9-24 to 4.9-40). With regard to potential impacts associated with permanent noise increases, the ICMC SEIR includes the implementation of Mitigation Measures NOI-1 and NOI-2. The ICMC SEIR concludes that implementation of these mitigation measures would reduce potential noise impacts to less than significant because these measures minimize construction noise, such as limiting construction hours, requiring properly maintained construction equipment with manufacturer recommended noise-reduction devices (including mufflers), locating stationary construction equipment and staging areas at least 100 feet from sensitive receptors, and notifying neighboring land uses prior to construction activities. Operationally the measures require new or modified stationary noise sources such as utility plant facilities and major HVAC systems to be designed to minimize the exposure of noise-sensitive land uses. Mitigation measures NOI-1 and NOI-2 implement mitigation measures Noi-1B and Noi-2A from the 2007 LRDP EIR, respectively.

Mitigation Measures NOI-1 and NOI-2 are hereby adopted and incorporated into the Project. Therefore, the University finds that the Project will not result in significant impacts related to increases in ambient noise, groundbourne vibration, airport noise, and cumulative impacts will be consistent with the 2007 LRDP EIR's analysis.

12. Population and Housing

The 2007 LRDP EIR concluded that projects implementing the 2007 LRDP, incorporating existing best practices and 2007 LRDP EIR mitigation measures, will not result in new significant land use impacts (2007 LRDP EIR Vol 1, p. 4.10-10 to 4.10-17). The University finds that the Project will be consistent with the 2007 LRDP's population assumptions. The Project will also be consistent with applicable 2007 LRDP objectives. Therefore, the University finds that the Project will not result in significant impacts related to population and housing, and the environmental impacts resulting from the Project are within the scope of the 2007 LRDP EIR analysis. No new mitigation measures are required.

13. Public Services

The 2007 LRDP EIR concluded that projects implementing the 2007 LRDP, incorporating existing best practices and 2007 LRDP EIR mitigation measures, will not result in new significant impacts upon public services (2007 LRDP EIR Vol 1, p. 4.12-5 to 4.12-8). The Project does not alter assumptions of the 2007 LRDP with regard to emergency access and emergency services demand, schools or parks. Construction of the proposed ICMC will not increase demand for public services to the extent that construction of additional facilities beyond those anticipated in the 2007 LRDP EIR will be required. Therefore, the University finds that the Project will be

**IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021**

within the scope of the 2007 LRDP EIR's analysis and will not result in new significant impacts related to public services. No new mitigation measures are necessary.

14. Recreation

The 2007 LRDP EIR concluded that projects implementing the 2007 LRDP, incorporating existing best practices and 2007 LRDP EIR mitigation measures, will not result in new significant impacts upon public services (2007 LRDP EIR Vol 1, p. 4.12-5 to 4.12-8). The Project does not alter assumptions of the 2007 LRDP with regard to parks and recreational facilities. Construction of the proposed ICMC will not increase demand for recreational facilities to the extent that construction of additional facilities beyond those anticipated in the 2007 LRDP EIR will be required. Therefore, the University finds that the Project will be within the scope of the 2007 LRDP EIR's analysis and will not result in new significant impacts related to recreation. No new mitigation measures are necessary.

15. Transportation and Traffic

The 2007 LRDP EIR concluded that projects implementing the 2007 LRDP, incorporating existing best practices and 2007 LRDP EIR mitigation measures, will not result in new significant impacts in the areas of increases in traffic, parking capacity, alternative transportation plans, and cumulative impacts (2007 LRDP EIR Vol 1 p. 4.13-25 to 4.13-60). With regard to potential impacts associated with conflicts with programs, plans, or ordinances, that address transit, roadway, bicycle, and pedestrian facilities, the ICMC SEIR includes the implementation of Mitigation Measures TR-1 TR-2, and TR-3. The proposed Project is fully accounted for in the growth allocated by the 2007 LRDP. Coordination has been made between the land use assumptions used in the 2007 LRDP and City of Irvine. The proposed Project is accounted for in the City's growth forecast, and the Project is consistent with the 2020-2045 RTP/SCS. As discussed in Chapter 4.13 of the 2007 LRDP EIR (page 4.13-50), specific transportation and traffic mitigation measures reduced the direct and cumulative traffic impacts resulting from 2007 LRDP traffic to less than significant. The 2007 LRDP EIR concluded that buildout of the LRDP traffic volumes are projected to increase incrementally over a long planning horizon (2007-2025).

Implementation of Mitigation Measures TR-1 and TR-2 from the ICMC SEIR require on-site Project TDMs to be implemented and continuance of campus-wide TDM programs that would reduce vehicle trips consistent with the key planning objectives of the 2007 LRDP Circulation Element. Mitigation Measure TR-3 requires a traffic control plan to be prepared if a campus construction project or a specific campus event requires an on-campus lane or roadway closure, or could otherwise substantially interfere with campus traffic circulation. Implementation of Mitigation Measures TR-1, TR-2, and TR-3 would reduce potential impacts to less than significant. Mitigation measures TR-1, TR-2 and TR-3 implement mitigation measures Tra-11, Tra-1A, and Tra-1J from the 2007 LRDP EIR, respectively. Mitigation Measure HAZ-4 addresses potential impacts associated with inadequate emergency access. Implementation of Mitigation Measure HAZ-4 would ensure sufficient notification to the UCI Fire Marshal to allow coordination of emergency services that may be affected during construction. Potential impacts are less than significant.

IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021

Mitigation Measures TR-1, TR-2, and TR-3 are hereby adopted and incorporated into the Project. Therefore, the University finds that the Project will not result in significant impacts related to conflicts with transportation plans, vehicle miles traveled, design hazards, inadequate emergency access, and cumulative impacts will be consistent with the 2007 LRDP EIR's analysis.

16. Tribal Cultural Resources

The 2007 LRDP EIR did not evaluate potential impacts on tribal cultural resources as there were no adopted thresholds for these resources at the time the 2007 LRDP EIR was prepared. It is possible that unknown buried tribal cultural resources could be present on the Project Site and would not be discovered until after construction activities begin. Should buried or otherwise unknown tribal cultural resources, per Public Resources Code Section 5024.1, be encountered and damaged during construction, a potentially significant impact would result. Implementation of Mitigation Measures TCR-1, CUI-1, CUL-2, and CUL-3 would reduce impacts to unknown Tribal Cultural Resources, but due to impacts on archeological site P30-000115/CA-ORA-115, potential impacts remain significant and unavoidable.

Site P30-000115/CA-ORA-115 would be directly impacted by the proposed Project. Due to the likelihood of archaeological resources present, Project-specific Mitigation Measure CUL-1 would be implemented which outlines a Data Recovery Plan. The Data Recovery Plan is the systematic recovery of site data, including artifacts, stratigraphy, and cultural features. Should resources related to Tribal Cultural Resources be discovered, a management plan involving consulting Native American tribes and Tribal Monitors would be implemented consistent with Mitigation Measure TCR-1. Data recovery is required within the archaeological site but must also take into consideration areas within the Project area that are mapped outside the current archaeological site boundaries. Implementation of this mitigation measure is consistent with UCI's 2007 LRDP EIR Mitigation Measure Cul-1B.

After data recovery of the known site, there is a possibility that archaeological remains could occur beneath the ground surface within other areas of the Project Site (2007 LRDP EIR, page 4.4-4). Earthmoving activities could possibly uncover previously undetected archaeological remains associated with prehistoric cultures, and a loss of a significant archaeological resource could result if such materials are not properly identified. Therefore, implementation of Mitigation Measure CUL-2 would require monitoring by a qualified archaeologist during earthwork, which would reduce potential impacts due to any unknown archaeological resources. Should resources related to Tribal Cultural Resources be discovered, a management plan involving consulting Native American tribes and Tribal Monitors would be implemented consistent with Mitigation Measure TCR-1. Implementation of this mitigation measure is consistent with UCI's 2007 LRDP EIR Mitigation Measure Cul-1C.

Future ground-disturbing activities during grading and construction activities could encounter buried human remains that were not identified during the cultural resource report conducted for the proposed Project. This could result in damage to unknown, buried human remains and mitigation would be required. Mitigation Measures CUL-3 and TCR-1 identify procedures for recording and treating any human remains should they be discovered during Project construction. The measure requires that remains be protected, preserved, and treated in accordance with applicable laws, regulations and guidelines. With the implementation of

**IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021**

Mitigation Measures CUL-3 and TCR-1, potential impacts would be less than significant.

With regard to cumulative impacts, despite the site-specific nature of the resources, mitigation required for the identification and protection of unknown or undocumented resources may result in cumulative impacts. The proposed Project would cumulatively contribute to a potentially significant impact.

Mitigation Measures TCR-1, CUL-1, CUL-2, and CUL-3 are hereby adopted and incorporated into the Project. Nonetheless, the University finds even with implementation of these measures, significant unavoidable impacts will occur as described above. Therefore, the University finds that specific economic, legal, social, technological, or other considerations make it infeasible to reduce this impact to a less than significant level.

17. Utilities and Service Systems

Findings Related to the Project

The 2007 LRDP EIR concluded that projects implementing the 2007 LRDP, incorporating existing best practices and 2007 LRDP EIR mitigation measures, will not result in new significant utilities and service systems impacts (2007 LRDP EIR Vol 1, p. 4.14-12 to 4.14-24). Because the Project will not require additional physical development beyond that anticipated in the 2007 LRDP EIR, the University finds that the Project's impacts related to water use, stormwater facilities, solid waste, and energy uses will be within the scope of the 2007 LRDP EIR's analysis and less than significant. Therefore, the University finds that the Project will not result in significant impacts related to utilities and service systems, and the environmental impacts resulting from the Project are within the scope of the 2007 LRDP EIR analysis. No new mitigation measures are necessary.

VI. FINDINGS ON PROJECT ALTERNATIVES

Chapter 5 of the ICMC SEIR evaluated a reasonable range of alternatives to the Project that, as required by CEQA, were potentially feasible and met the basic Project objectives. In compliance with CEQA and the CEQA Guidelines, the alternatives analysis included an analysis of a no-project alternative.

The University certifies that it has independently reviewed and considered the information on alternatives provided in the ICMC SEIR and in the administrative record. For the reasons set forth below, the University finds that the alternatives either would not meet any of the Project objectives, would only partially meet some of the Project objectives, would not result in fewer significant and unavoidable impacts than the Project itself or are "infeasible" as that term is defined by CEQA and the CEQA Guidelines.

The ICMC SEIR evaluated four alternatives to the project: Alternative 1: No Project/No Development Alternative, Alternative 2: Land Uses Consistent with Existing LRDP Designations Alternative, Alternative 3: Jamboree and Campus Drive Alternative, and Alternative 4: West Campus Alternative.

IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021

- **Alternative 1: No Project/No Development Alternative**

Under the No Project Alternative, the Project would not be constructed, and existing conditions would continue. None of the Project development components would be approved, and no amendment to the UCI 2007 LRDP would be required.

The No Project Alternative would not result in contributions to the impacts studied in the 2007 LRDP EIR as identified in the ICMC SEIR, nor would it result in any of the proposed Project's impacts that would be more severe than identified in the 2007 LRDP EIR. However, the No Project/No Development Alternative would not achieve any of the basic project objectives of the proposed Project. Therefore, the University rejects the No Project/No Development Alternative.

- **Alternative 2: Land Uses Consistent with Existing LRDP Designations Alternative**

Alternative 2 is the alternative that assumes development of the Project consistent with the existing 2007 LRDP land use designations. The 2007 LRDP identifies that the existing 2007 LRDP land use designations for the Project Site are Mixed Use – Commercial and Open Space – General. The Mixed Use – Commercial land use designation allows for the construction of up to 950,000 square feet of facilities for Clinical, General Office, Research and Development, Academic Uses, Commercial and Retail, Conference Facilities, and Residential uses (up to 435 units) within the North Campus area.

The Open Space – General land use designation allows for the construction of pedestrian and bike trails, water quality and drainage structures, food service, interpretive centers, field research facilities, maintenance roads, and support structures. The Open Space – General designation is located on the southern portion of the Project Site and is the area that contains the 150-foot development Buffer Area from the UC San Joaquin Marsh Reserve. Consistent with the land use requirements of the 2007 LRDP, development under this alternative would have the same 150-foot Buffer Area from the Marsh as the proposed Project.

Anticipated uses under this alternative could include for profit uses such as high-rise market rate residential housing, commercial office space, and support retail. Medical offices could be developed under this alternative, but no inpatient uses would be permitted. It is assumed that development under this alternative would include a similar number of square feet of development area to account for roadway, open space, and parking requirements.

Alternative 2 would have no additional significant impacts in comparison to the proposed Project. Significant and unavoidable direct and cumulative impacts associated with cultural resources and tribal cultural resources would remain significant and unavoidable due to development on the Project Site. Mitigation similar to the proposed Project would be required to reduce potential significant impacts to less than significant in the areas of aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality noise, and transportation and circulation. No significant impacts are anticipated related to population and housing, public services, recreation, or utilities.

**IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021**

Because the existing 2007 LRDP designation allows for medical office buildings, this alternative could meet most of the project objectives. However, because inpatient services are not allowed under the existing LRDP designation, the project could not meet the following objectives:

- Ensure appropriate and adequate access to high-quality health and wellness care to the community through a convenient location in central Orange County.
- Leverage the co-location of UCI Health research, teaching, inpatient and outpatient programs through a location on the Irvine Campus.
- Develop a campus setting providing a full range of onsite health and wellness services.
- Serve as the destination provider for distinctive health care service lines.

Providing inpatient care and a range of services is critical for a hospital to provide specialized and distinctive health care services. Additionally, the hospital would provide an emergency room which requires inpatient care for critical illness and traumatic injuries which is important to being a destination provider and offering a full range of onsite health and wellness services. For these reasons, the University rejects the Land Uses Consistent with Existing LRDP Designations Alternative.

- **Alternative 3: Jamboree Road and Campus Drive Alternative**

Development under Alternative 3: Jamboree Road and Campus Drive Alternative consists of the same programming for a campus medical complex as the proposed Project but located at a different site within the UCI North Campus just to the north of the proposed Project Site. The Alternative 3 site is located on Jamboree Road at the southeast corner of the intersection of Campus Drive. The Alternative 3 site is larger at approximately 22 acres compared to 14.5 acres for the proposed Project. As such, development under Alternative 3 would be at a lower intensity with surface parking proposed instead of a parking structure. The surface parking lot would be developed on the current UCI Arboretum site and the Arboretum would be relocated to another location on the UCI main campus. This site would result in a higher visibility for UCI Health given its location on Jamboree Road. Development in this location would require relocation of the existing UCI support services facilities to another location on the UCI campus. No alternative location for the facilities has been identified at this time but the impact of relocating that use would occur.

Alternative 3 would have no new significant impacts in comparison to the proposed Project. Significant and unavoidable direct and cumulative impacts associated with cultural resources and tribal cultural resources would remain from development within a known cultural resources site. Impacts on biological resources would be greater because the construction would occur in a larger area of the Arboretum site, removing more existing vegetation from that area. Impacts from contaminated soils from offsite properties are considered likely in this location due to the proximity of the offsite sources across Jamboree Road. Impacts on water quality would be increased due to the increase in impervious surface area associated with the expanded surface parking lot.

Alternative 3 would result in the need for approximately 117,000 square feet of UCI Support Services facilities to be relocated and new facilities to be constructed in another location

IRVINE CAMPUS MEDICAL COMPLEX

CEQA FINDINGS

January 20, 2021

on the UCI campus. This would result in additional impacts related to the emissions, noise, and GHG from the demolition activities as well as additional development related impacts and costs due to the relocation of the uses to new buildings or the construction of new buildings at a yet to be determined location within the Central campus. These relocation-related impacts would not occur under the Project.

Construction in this location would bring development closer to the existing residential units located across Campus Drive. Overall, noise impacts under this alternative would be greater than those that would occur under the proposed Project.

Mitigation similar to the proposed Project would be required to reduce potential significant impacts to less than significant in the areas of aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality noise, and transportation and circulation. Similar to the proposed Project, significant and avoidable impacts on cultural and tribal cultural resources would remain after the implementation of mitigation measures. No significant impacts are anticipated related to population and housing, public services, recreation, or utilities.

However, implementing Alternative 3 would require relocation of the UCI support services facilities to another location within the UCI campus. No known location for these facilities has been identified at this time; however, additional impacts related to the relocation of existing buildings and construction of new buildings would occur compared to the proposed Project.

Because Alternative 3 proposes the same uses as the proposed Project, this alternative could meet most of the project objectives. However, because the alternative would be moved away from the natural open space area of the San Joaquin Marsh Reserve, and a substantial portion of the project area would be dedicated to surface parking, the project could not meet the following objectives:

- Provide a site location with high-quality open space connections to provide an environment that promotes healing and wellness.
- Support the stewardship of adjacent UCI open space resources.

Locating the medical complex near the intersection of Jamboree Road and Campus Drive would move it farther from the open space area taking away the opportunity for a connection with the existing open space area on the UCI campus. Additionally, this alternative would remove the Arboretum from its current location and replace it with a parking lot. This connection to open space, both visually and physically, is a critical component of the landscape that contributes to the healing and wellness environment desired for the Project. This project would result in increased impacts to air quality, greenhouse gas emissions, biological resources, hydrology and water quality, and noise compared to the proposed Project. As with the proposed Project, this alternative still would result in significant and unavoidable direct and cumulative impacts associated with cultural resources and tribal cultural resources. For these reasons, the University rejects the Jamboree Road and Campus Drive Alternative.

IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021

- **Alternative 4: West Campus Alternative**

Development under Alternative 4 would be located on the UCI West Campus. Consideration was originally given to locating the Project on the UCI West Campus near the intersection of Bison Avenue at California Avenue. The Project in this location would be adjacent to the College of Health Sciences/Nursing Building development approved in 2019. A site analysis was prepared, and site planning options were developed for UCI consideration. Under this alternative, the proposed hospital would be the same size, but would not include an emergency department. The hospital and ambulatory care center would be attached as one building. Under Alternative 4, the ambulatory care center would be a smaller facility at 80,000 to 120,000 square feet compared to 225,000 square feet for the proposed Project. Parking would be a combination of surface parking and a parking structure. Development in this location would require an amendment to the 2007 LRDP to change the existing designation of Open Space – General to Income-Producing Inclusion Area and adding Inpatient use as an allowable use.

Alternative 4 would have new impacts on biological resources requiring additional mitigation for wetland and sensitive habitats, in comparison to the proposed Project, to reduce impacts to less than significant. However, significant and unavoidable direct and cumulative impacts associated with cultural resources and tribal cultural resources would be avoided under this alternative. Known impacts from contaminated soils from offsite properties would be avoided under this alternative. Impacts on traffic would be increased because the alternative would draw more traffic trips into the campus core from employees and patients traveling to and from the medical complex, which is not as easily accessible to off-campus users, and there are fewer public transit opportunities available to off-campus users.

Mitigation similar to the proposed Project would be required to reduce potential significant impacts to less than significant in the areas of aesthetics, air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, and transportation and circulation. Potentially, significantly and unavoidable impacts associated with site P30-000115/CA-ORA-115 would be avoided under this Alternative. No significant impacts are anticipated related to population and housing, public services, recreation, or utilities.

Alternative 4 proposes the same general uses as the proposed Project however, the facilities would be smaller resulting in a reduced capacity to function as a teaching hospital. This alternative does not include a hospital emergency room to serve the surrounding community. This alternative would also remove existing designated open space areas from the West Campus and require an amendment to the 2007 LRDP to change the land uses. As such, this alternative could meet some of the Project objectives. For these reasons, and because Alternative 4 would have a reduced development footprint and be located away from the natural open space area of the San Joaquin Marsh Reserve, the Project would not meet the following objectives:

- Ensure appropriate and adequate access to high-quality health and wellness care to the community through a convenient location in central Orange County.
- Provide a site location with high-quality open space connections to provide an environment that promotes healing and wellness.

IRVINE CAMPUS MEDICAL COMPLEX

CEQA FINDINGS

January 20, 2021

- Support the stewardship of adjacent UCI open space resources.
- Contribute to campus-wide targets related to fossil fuel reduction, water efficiency, waste reduction, and transportation.

Because the West Campus Alternative would meet Project objectives to a lesser extent than would the Project, the University rejects this alternative.

VII. ADDITIONAL FINDINGS

A. Findings on Responses to Comments on the DSEIR and Revisions to the Final SEIR

The FSEIR includes the comments received on the DSEIR and responses to those comments. The focus of the responses to comments is on the disposition of significant environmental issues as raised in the comments, as specified by CEQA Guidelines Section 15088(b). The University finds that responses to comments made on the DSEIR and revisions to the FSEIR merely clarify and amplify the analysis presented in the document and do not trigger the need to recirculate per CEQA Guidelines Section 15088.5(b).

B. Incorporation by Reference

These Findings incorporate by reference in their entirety the text of the ICMC SEIR, the 2007 LRDP EIR and Addendum #3 thereto, and the Findings including the Statement of Overriding Considerations adopted in support of the 2007 LRDP previously certified and/or adopted by the University.

C. Record of Proceedings

Various documents and other materials constitute the record of proceedings upon which the University bases its findings and decisions contained herein. Because of the complexity of the issues addressed in connection with the review of the Project, these documents and materials are located in various offices of the UCI campus. The custodian for these documents and materials is the UCI Office of Physical and Environmental Planning, located at 4199 Campus Drive, Suite 380, Irvine, California 92697.

VIII. STATEMENT OF OVERRIDING CONSIDERATIONS

A. Impacts That Remain Significant and Unavoidable

As discussed above, the University has found that the following impacts of the Project remain significant, either in whole or in part, following adoption and implementation of the mitigation measures described in the UCI FSEIR:

**IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021**

Environmental Impact Area	Significant and Unavoidable Impact	Applicable Mitigation	Comparison to 2007 LRDP EIR
Cultural Resources	Direct and Cumulative impacts on archaeological resources	MM CUL-1, CUL-2, and CUL-3.	New significant and unavoidable impact
Tribal Cultural Resources	Direct and Cumulative impacts on unknown buried tribal cultural resources	MM TRC-1, CUL-1, CUL-2, and CUL-3	New significant and unavoidable impact

B. Overriding Considerations

In accordance with CEQA Guidelines section 15093, the University has, in determining whether or not to approve the Project, balanced the economic, legal, social, technological and other benefits of the Project against its unavoidable adverse environmental impacts. Having (i) adopted all feasible mitigation measures, (ii) recognized all significant, unavoidable impacts, and (iii) balanced the benefits of the Project against its significant and unavoidable impacts, the University finds that, for the reasons set forth below, the benefits of the Project outweigh the Project’s significant adverse environmental effects such that the University considers these adverse environmental effects to be “acceptable.” Each benefit set forth below constitutes an overriding consideration warranting approval of the Project, independent of the other benefits, despite each and every unavoidable impact. This statement of overriding considerations is based on the University’s review of the ICMC SEIR and other information in the entire administrative record. The benefits of the Project include the following:

- The ICMC project will develop a new hospital to serve Orange County’s diverse community, including providing greater choice and access to Irvine, Newport Beach, and south Orange County residents looking for the specialty care offered by the new hospital.
- The ICMC project will develop a clinical and hospital component of the Health Sciences Campus expansion plan to serve clinical, academic, and research mission requirements for the future.
- The ICMC project will provide technology and telehealth infrastructure to increase efficiency and utilization, optimize the care team model, and enhance the care delivery experience for both staff and patients.
- The ICMC project furthers the UCI Health Sciences mission of providing a teaching hospital on the UCI campus to enhance the program’s medical teaching facilities and provide enhanced medical facilities for the residents of south Orange County.
- The ICMC project will develop the UCI North Campus with facilities that are consistent with the campus 2007 LRDP.
- The ICMC project will create new employment opportunities (including construction, part-time, and full-time jobs) for UCI faculty, staff, and students as well as members of the surrounding communities.

IRVINE CAMPUS MEDICAL COMPLEX

CEQA FINDINGS

January 20, 2021

- The ICMC project will advance UCI's goals of developing a sustainable project by constructing buildings that meet a minimum of LEED Silver with a goal of LEED Gold, construct a Central Utility Plant featuring electric heat-recovery chillers for building and water cooling and heating, will result in net zero carbon emissions, and reduces the distance people in the surrounding community will have to travel for emergency and specialty care.
- The ICMC project will transform underutilized North Campus property by promoting compact and clustered development of medical facilities while protecting the UC San Joaquin Marsh Reserve.

Considering all factors and the evidence in the ICMC SEIR and other relevant documents, the University finds that specific economic, legal, social, technological, and other benefits of the Project outweigh the significant and unavoidable adverse environmental impacts of the Project. The University therefore, pursuant to CEQA Guidelines Section 15093(b), finds that those significant adverse impacts are acceptable in the context of the overall Project benefits.

IX. SUMMARY

Based on the foregoing Findings and the information contained in the administrative record, the University has made one or more of the following Findings with respect to the significant environmental effects of the Project as described in the ICMC SEIR:

- Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant effects on the environment.
- Changes or alterations that are wholly or partially within the responsibility and jurisdiction of another public agency have been, or can and should be, adopted by that other public agency.
- Specific economic, legal, social, technological, or other considerations make infeasible certain mitigation measures and alternatives.

Based on the foregoing Findings and the information contained in the administrative record, it is hereby determined that:

- All significant effects on the environment due to approval of the Project have been eliminated or substantially lessened to the extent feasible for the reasons set forth in Section V of these Findings, above.
- Any remaining significant effects on the environment found to be unavoidable are acceptable due to the factors described in the Statement of Overriding Considerations in Section VIII, above.

X. APPROVALS

Having reviewed and considered the 2007 LRDP EIR, as augmented by Addendum #3, and the Subsequent Environmental Impact Report for the Irvine Campus Medical Complex, incorporating all comments received and responses thereto, for the proposed Project as described

**IRVINE CAMPUS MEDICAL COMPLEX
CEQA FINDINGS
January 20, 2021**

in Section I, above, The Regents hereby takes the following actions:

- A. Certify the Subsequent Environmental Impact Report for the Irvine Campus Medical Complex project.
- B. Adopt the Mitigation Monitoring and Reporting Program for the Irvine Campus Medical Complex project and make a condition of approval the implementation of mitigation measures within the responsibility and jurisdiction of UC Irvine.
- C. Adopt the CEQA Findings and Statement of Overriding Considerations for the Irvine Campus Medical Complex project.
- D. Approve Amendment #3 to the 2007 Long Range Development Plan.
- E. Approve the design of the Irvine Campus Medical Complex project.