

Via email: [ron.peluso@navigantconsulting.com](mailto:ron.peluso@navigantconsulting.com)

October 17, 2011

Ron Peluso, Project Manager  
c/o Marin Healthcare District  
100B Drakes Landing Road, Ste 250  
Greenbrae, CA 94904



**Re: Scoping for Marin General Hospital Replacement Project**

Dear Mr. Peluso:

Marin Conservation League requests that the following be included in the project's Environmental Impact Report.

**Transportation/Circulation.**

Parking. The EIR should describe current and future parking needs for all buildings on site, whether or not the applicant has included their use in the current application, and parking estimates should assume that they are fully occupied with a reasonable range of services, such as services that are currently located off-site. Parking needs for hospital and Healthcare District leased off-site space should also be described. Structures on the campus include the following:

1. The acute care hospital, associated offices and services such as IT and utilities, and the mental health facility. 2. The proposed ambulatory services building. 3. The central and east wings, comprising 67,726 square feet, which are planned to be vacated but which could serve office or outpatient uses in the future.

The hospital leases offices for support services at several locations and it is plausible that these services could move onto the campus into the vacated structures. It would be helpful to have information about how much space and parking is used by the hospital and the Healthcare District at off-site locations.

Current parking data should include spaces currently being used by the hospital staff and visitors at St. Sebastian's and along Bon Air Road.

Circulation and Traffic. Trip generation estimates for all structures on the site, whether or not the current application plans their use, should be given. Vehicle trip data should presume that all structures are fully used. Traffic and trip volume data should include Bon Air Road, Magnolia Avenue, Sir Francis Drake Boulevard, the Sir Francis Drake/101 interchanges and Highway 101, and studies should be modeled to include area school traffic at peak times and hours. College of Marin traffic in particular increases and ebbs with the time of year and traffic counts should be considered as it would be at the beginning of a semester when it is heaviest.

The EIR should estimate numbers and sizes of trucks and other construction vehicles that would be transporting materials to and from the site, including fill removed for construction of the hospital and parking structures. What routes would construction vehicles take? Will trucks be covered and is there any plan for street sweeping if that is needed. How would construction traffic, and particularly trucks with fill, affect surrounding roadways and 101.

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Vehicle and pedestrian flow in the campus interior and on Bon Air Road should be included.

Describe public transit services and TDM measures serving the hospital and how this affects traffic and parking. For example does the hospital have a car, van or ride sharing program for staff or might one be productively implemented?

### **Air Quality/Greenhouse Gases**

What air quality impacts would there be from construction, for example from dust created by hillside grading, notably on surrounding residential areas but also on Creekside Park?

### **Geophysical /Seismic**

The EIR should describe the process and impacts of grading and fill removal, including material volume, associated especially with parking structure B.

As the project's major purpose is seismic retrofit, there should be a description of seismic conditions and how such as fault lines in the project area and how the project would be constructed to meet state mandates.

### **Land Use**

The proposed Ambulatory Services Building (ASB) appears to require an amendment to the Development Code to allow the land use category "Medical Services – Clinics and Laboratories" in the PF zoning district which governs the hospital's property. This in turn may generate the need for an affordable housing plan associated with construction of the ASB. The EIR should examine how the Development Code change could affect properties in this zoning district, and impacts that might be associated with the affordable housing requirement.

### **Biological Resources**

How would the project's construction affect biotic communities on the hillside where parking garage B would be located, and on the Hal Brown Creekside Park?

### **Hydrology**

Pending sea level rise could affect groundwater and flooding potential on site. This should be considered in the EIR. Would there be any underground or below ground storage of emergency equipment, i.e. compressors, generators, ventilators, x-ray equipment, all-terrain vehicles, etc. and could there be any impacts from groundwater intrusion.

Yours truly,



Susan Stompe  
President