

December 14, 2017

Patrick Streeter, Senior Planner  
City of Santa Rosa  
Community Development Department  
100 Santa Rosa Avenue, Room 3  
Santa Rosa, CA 95404

City of Santa Rosa

DEC 14 2017

Planning & Economic  
Development Department

Re: File No. PRJ17-009; DR17-006  
SR Memorial Hospital Medical Office Building & Parking Structure Project

City of Santa Rosa Design Review Board:

Please receive my comments on the above referenced project proposed by Santa Rosa Memorial Hospital/St. Joseph's Health ("SRMH"). I respectfully request that these comments along with any responses be included in the administrative record for this project being considered by the Design Review Board.

Let me begin by stating that I am not an opponent of the operations and services provided by SRMH. When we purchased our home on Parker Drive in 2003 we were well aware of the hospital located a block from our home including medivac helicopter services. Our family has used SRMH facilities many times over the years for a variety of medical treatments, including the birth of my son. The recent Santa Rosa Wildfires have demonstrated what a valuable regional medical service provider SRMH has become. Few would argue that the regional medical services and quality jobs provided by the SRMH Regional Medical Center ("RMC") are valued and important to the North Bay. At the same time SRMH, a major developer of an ever-expanding regional medical center, should not be given a free pass from its legal obligation to fully mitigate all of the impacts resulting from its expanding operations.

Over the past 15 years, SRMH has pursued an aggressive expansion of its RMC on a piecemeal project by project basis. During this same period, SRMH has failed to evaluate and fully mitigate the cumulative impacts resulting from construction of a sprawling medical center on traffic, parking and pedestrian safety in the surrounding residential neighborhoods. This is a clear violation of the California Environmental Quality Act ("CEQA"). The neighborhoods surrounding the RMC are depending on the City and its decisionmakers to ensure that when considering this proposed project, SRMH will be required to properly plan and build a RMC that serves its growing medical service needs, coexists with the surrounding residential neighborhoods and fully mitigates all current and cumulative impacts.

After reviewing this proposed project, I submit that both the Traffic Study and Negative Declaration are flawed documents and should not be approved as justification for this project. This proposed project represents the largest and most significant expansion since the construction of the original SR Memorial Hospital. At no time during the last 15 years has SRMH prepared or submitted any master plan for review and approval by the City

and various stakeholders detailing phased expansion of the RMC through ultimate buildout. A comprehensive master plan would enable the City and all stakeholders, in an open forum, an opportunity to review and understand all of the elements and impacts of such a large medical center along with a detailed mitigation plan. Below are examples of how SRMH's piecemeal expansion of the RMC has progressed in recent years:

- Regional Trauma Center & Expanded Emergency Room
- Heart & Vascular Center
- Center for Bone and Joint Care
- Regional Cancer Center
- Affiliation with UCSF Benioff Children's Hospitals
- Ambulatory Surgery Center
- 85 Brookwood @ 2<sup>nd</sup> St Major Medical Services Building
- 121-151 Sotoyome Major Medical Services Building
- 170 Sotoyome Medical Services Office
- 1111 Sonoma Ave Major Medical Services Building
- 1435 Montgomery Drive Medical Office
- 1194 Montgomery Drive SRMH Employee Credit Union
- 300 Doyle Park Drive Conversion to SRMH Doctor Housing
- 528 & 540 Doyle Park Drive cleared for future development

The attached Location Map has been highlighted to show all of these recent SRMH additions in an effort to give more perspective and scale to the current operating RMC beyond just the proposed project. In many cases during this period, SRMH expanded its RMC by acquiring large existing medical buildings, made tenant improvements and installed a new SRMH Monument Sign. No analysis or study of impacts was conducted in these instances on traffic, parking and pedestrian safety resulting from any changes in use in these various medical buildings from independent medical service providers to regional medical service providers, and how such changes may result in significant increases in patients and staff. It is also clear that if the current project is approved as proposed, there is little chance a master plan will ever be prepared to ensure that the SRMH RMC is properly designed and constructed to respect and coexist with the surrounding residential neighborhoods.

By comparison, a new Sutter Hospital along with medical office buildings and dedicated parking was approved and constructed in recent years to replace the aging Sonoma County Community Hospital in Santa Rosa using a Specific Plan and Environmental Impact Report ("EIR"). This Sutter medical center is similar in size and services to the current SRMH regional medical center including hospital, medical office buildings and dedicated parking facilities. It is also worth noting that the Sutter Hospital was able to construct expansive surface parking with its project compared to SRMH having to construct multi-story parking structures due to site constraints, and does not provide the medivac helicopter and trauma services that SRMH does.

Below are various comments relating to the proposed project and the overall process in which SRMH has been allowed to expand its RMC in the past 15 years. It is my hope that the Design Review Board will require SRMH to respond to all of these comments in sufficient detail before taking any action on this proposed project:

***1.. The Neighborhood Context Map on Page 7 of the Proposed Project Initial Study and Negative Declaration dated 9-15-2017 fails to identify that most of the surrounding properties on this map are currently owned and operated by the SRMH RMC. The map also fails to show the public elementary school located two short blocks from the proposed project site. These omissions are major flaws in this document by concealing important information from City decisionmakers, City Staff and interested stakeholders showing how much SRMH has expanded its RMC in recent years. Shouldn't SRMH be required to correct these omissions in its Initial Study/Negative Declaration before consideration by the Design Review Board?***

SRMH's piecemeal project by project expansion of its RMC during this period has resulted in significant cumulative traffic, parking and pedestrian safety impacts that have gone unmitigated. Nothing suggests that a comprehensive traffic study covering the entire RMC through buildout, including cumulative impacts, has ever been completed during this period on any of its previous expansion projects. As another example, SRMH patients, employees, vendors and contractor trips to and from the RMC have increased exponentially along with the entire footprint of this sprawling RMC. SRMH has shown no willingness to take responsibility for analyzing and fully mitigating these impacts.

The Traffic Study submitted with the Project Application is flawed and should be amended before any approvals are considered by the City, because only six specific intersections were evaluated in the study. It appears the Traffic Study is concluding that all current and future traffic impacts from the proposed project serving the RMC are restricted to areas south of Montgomery Drive. By omitting any analysis or discussion of the current or cumulative traffic, parking or pedestrian safety impacts in the neighborhoods north of Montgomery Drive, the Traffic Study is making an erroneous conclusion that there are no significant traffic, parking or pedestrian safety impacts in these neighborhoods.

***2. Because the Traffic Study fails to fully evaluate and mitigate and current or cumulative impacts on traffic, parking and pedestrian safety on any intersections or residential neighborhoods north of Montgomery Drive, how can the Applicant or City defend such an omission in its Environmental Document?***

I have attended many Neighborhood and Pre-Application meetings over the past year with City staff and SRMH Project representatives including one on one meetings on the current project. At every turn, I reiterated the existing traffic, parking and pedestrian safety issues at various locations within the expanded RMC. More than once I was assured by SRMH representatives that these traffic, parking and pedestrian safety issues would be studied and mitigated. Yet here we are and these concerns are still unresolved in my mind and in some cases ignored. It is clear that SRMH does not intend to "do the right thing" as a good neighbor as it continues to expand its RMC piece by piece. So, the responsibility falls on the City to require SRMH to identify all impacts current and cumulative and prepare a detailed mitigation plan moving forward. Below are the various traffic, parking and pedestrian safety issues I have previously raised:

Fourth St and Talbot Ave Intersection:

This is the most impacted intersection since SRMH began expansion of its RMC. Increased traffic volumes without a traffic signal has led to daily near miss accidents involving cars and pedestrians. Traffic flows at this intersection are currently unsafe. My wife and I have nearly been hit by speeding cars multiple times trying to cross Fourth Street while walking our dog or trying to cross Fourth Street in our car. I am certain many others have experienced similar dangers at this intersection. I was assured by SRMH representatives at each of the previous meetings that this intersection would be included in the proposed project traffic study. Sadly, it was not.

**3. *Given that the Talbot Ave/Fourth St intersection is only a few blocks from the proposed project site, why was it excluded from the Traffic Study, as it is likely the most heavily impacted intersection and currently used by numerous SRMH RMC patients, employees, vendors and contractors more than any of the other six intersections studied in the Traffic Study?***

**4. *Why did the Traffic Study evaluate intersections at Sonoma/Brookwood and 3<sup>rd</sup> St/Brookwood and not include any intersections north of Montgomery Drive, some of which are actually closer to the project site?***

Talbot Ave and Montgomery Dr Intersection:

Partial stop sign controlled intersection two blocks from the proposed project site. Traffic volume is steady and fast moving. Existing pedestrian cross walk light is regularly ignored by autos and pedestrians are often trapped in the middle of the crosswalk. Autos often challenged to safely cross Montgomery Drive due to traffic volumes and speed.

**5. *Why was the Talbot/Montgomery intersection excluded from Traffic Study intersection analysis when it is only two blocks from the proposed project site?***

Talbot Ave/Doyle Park Drive/Leonard Intersection:

This intersection is another intersection located north of Montgomery Drive and only one block from the current SRMH Hospital and two blocks from the proposed project site. Traffic through this intersection is heavily impacted by SRMH RMC patients, employees, vendors and contractors often driving too fast and ignoring existing arterials.

**6. *Why was the Talbot/Doyle Park/Leonard Intersection excluded from the Traffic Study given its close proximity to the proposed project site?***

Second St and Montgomery Drive Intersection:

Located two blocks from the proposed project site. Stop sign controlled with push button pedestrian crossing light located one block from the proposed project site. There is also a large multi-unit housing complex at this intersection serving many seniors and disabled residents. Daily traffic volume is heavy and fast. Current auto left turn movements are uncontrolled and dangerous especially on weekdays. Even with the push button pedestrian crossing light, pedestrian crossing is unsafe.

**7. *What was the Second St/Montgomery Intersection excluded from the Traffic Study given it is only two blocks from the proposed project site in favor of a study of the intersection at 3<sup>rd</sup> St/Brookwood?***

**Pedestrian Safety Impacts:**

The general statement in the Project Application regarding Pedestrian Facilities does not reflect existing conditions. The existing SRMH RMC is neither pedestrian friendly nor safe, and the Traffic Study spends little time discussing its plan to improve pedestrian flow or safety beyond some striping and relocation of an existing crosswalk. Particularly dangerous is crossing Montgomery Drive from Talbot Drive down to 2<sup>nd</sup> Street. Currently SRMH patients, visitors and employees often have to run across Montgomery Drive to safely cross the street to various RMC buildings. The existing SRMH Parking Structure is poorly designed with only a single point of ingress and egress for autos and pedestrians. With no mounted Stop sign and only a faded stop bar in the travel lane that is barely visible, autos roll into and out of the parking structure onto Montgomery Drive resulting in many near collisions with autos and pedestrians. Safety is further compromised at the current parking structure as it is also immediately adjacent to the location where SRMH patients are discharged from the hospital in wheelchairs and loaded into autos parked immediately next to the only entrance/exit point from the parking structure. Yet there is no discussion or plan outlined to correct these unsafe conditions that currently exist. There are few if any details in the Traffic Study on specific traffic calming measures to slowdown autos and improve pedestrian circulation and safety. Common examples include: additional traffic signals, lighted crosswalks and bulbouts to shorten pedestrian crossings.

**8. *Why weren't more pedestrian improvements and traffic calming measures such as additional traffic signals, flashing light crosswalks or bulbouts to shorten the length of crosswalks discussed or proposed in the Traffic Study or Draft Negative Declaration as mitigation measures to improve pedestrian safety and circulation especially on Montgomery Drive and at the existing parking structure single entrance exit location?***

Many of the comments above regarding the traffic impacts resulting from the phased expansion of the SRMH RMC also apply to increased parking impacts. SRMH patients, employees, vendors and contractors traveling to or working at the RMC regularly park on surrounding neighborhood streets far beyond the two-hour parking restrictions. As a direct result of the parking impacts on local streets from SRMH operations, local residents had to form a City Parking District at our cost, in an effort to keep cars from parking all day in front of our homes. I have raised this parking issue with SRMH reps at previous meetings and in direct correspondence but the parking problem continues unchanged to this date. City parking officers do their best to enforce the 2-hour parking requirements but SRMH employees, patients, vendors and contractors are very skilled at outsmarting the City parking enforcement efforts.

Example:

Every weekday SRMH employees and contractors park on Doyle Park and Parker Drive public streets usually directly in front of but not in the SRMH Parking Structure sometimes all day while working at the Hospital. SRMH makes no effort to regulate this parking abuse and it is laughable to think that after building a new and even larger Parking Structure farther away that SRMH employees, patients, vendors and contractors will use it rather than parking on neighborhood streets. Based on these current conditions, the parking mitigation plan for this proposed project is insufficient as it fails to properly mitigate an existing parking impact.

***9. Why do SRMH employees, vendors and contractors continue to park on neighborhood streets when SRMH claims in its current project Application that it has or plans to construct sufficient parking facilities for all its RMC operations?***

***10. Why hasn't SRMH submitted a parking plan as a part of this proposed project to fully mitigate the current and cumulative impacts of its patients, employees, vendors and contractors parking on neighborhood streets and not using the SRMH parking facilities?***

SRMH Parking Structure at 500-510 Doyle Park Dr:

No traffic control entering or exiting the parking structure. Many near miss traffic accidents on Doyle Park Drive. Dangerous for pedestrians at this location, many seniors.

SRMH Parking Lot at 525 Doyle Park Dr (Ambulatory Surgery Center):

Same comments as above.

***11. Why did the Traffic Study fail to evaluate the current traffic and pedestrian safety issues on Doyle Park Drive between Montgomery Drive and Sonoma Avenue located only a block from the proposed project site, and propose mitigation measures to reduce what are already dangerous conditions for autos and pedestrians entering and exiting SRMH facilities at 500, 510 and 525 Doyle Park Drive?***

***12. Did the City require SRMH to conduct any environmental review of the current and cumulative impacts relating to the recent conversions to larger RMC service providers and intensification of uses in the buildings at 500 & 510 Doyle Park Drive, 121 Sotoyome, 85 Brookwood and 1111 Sonoma Avenue, specifically in the areas of traffic, parking and pedestrian safety?***

***13. Why does SRMH consider the proposed project a "Stand Alone Project" and not a phased expansion of a larger regional medical center?***

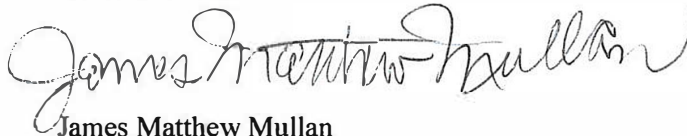
***14. Why has SRMH been permitted to expand its multi-million-dollar RMC on a project by project basis over the past 15 years, without being required to prepare a comprehensive Specific or Master Plan including a plan for phased expansion through buildout and an environmental review of the current and cumulative impacts, in particular traffic, parking and pedestrian safety?***



***15. Moving forward, when will SRMH be required to prepare and present, in a public forum for review and comments a comprehensive master plan for the phased expansion through ultimate buildout of its regional medical center?***

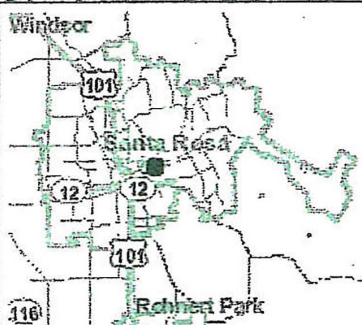
In closing, thank you in advance for the City's consideration, responses and action on these comments and its support of a SRMH Regional Medical Center that is dedicated to coexisting with and respecting the neighborhood we share. I also look forward to participating in what I hope is the City's requirement that SRMH prepare a comprehensive master plan to ensure the orderly expansion of its Regional Medical Center beginning with the current proposed project.

Very truly yours

A handwritten signature in cursive script that reads "James Matthew Mullan".

James Matthew Mullan  
1420 Parker Drive  
Santa Rosa, CA 95405  
[mattmullan@comcast.net](mailto:mattmullan@comcast.net)

Attachment – Location Map Highlighted



**Santa Rosa Memorial Hospital  
Medical Office Building and Parking Structure**



11/22/2016

Scale 1: 2,400

0 Miles 0.04