

Appendix A
**Notice of Preparation
(NOP), Scoping Meeting
Materials, and NOP and
Scoping Meeting
Comments**

Appendix A-1

NOP



CITY OF SANTA MONICA
CITY PLANNING DIVISION
1685 MAIN STREET, ROOM 212
SANTA MONICA, CA 90401

**NOTICE OF PREPARATION/NOTICE OF PUBLIC SCOPING MEETING
FOR A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
PROVIDENCE SAINT JOHN'S HEALTH CENTER PHASE II PROJECT**

DATE: April 10, 2017

TO: State Clearinghouse, Responsible Agencies, Trustee Agencies, Organizations and Interested Parties

LEAD AGENCY: City of Santa Monica
City Planning Division
1685 Main Street, Room 212
Santa Monica, California 90407
Contact: Rachel Kwok, Environmental Planner
Phone: (310) 458-8341

The City of Santa Monica (City) intends to prepare an Environmental Impact Report (EIR) for the proposed Providence Saint John's Health Center Phase II Project (the proposed project). In accordance with Section 15082 of the State CEQA Guidelines, the City has prepared this Notice of Preparation to provide the public, Responsible Agencies, and other interested parties with information describing the proposed project and its potential environmental effects. The EIR will address the proposed project's potentially significant effects in the following environmental issue areas:

- Aesthetics and Shade/Shadows
- Air Quality
- Construction Effects
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Population Housing
- Public Services
- Transportation/Circulation
- Utilities
- Mandatory Findings of Significance

PROJECT APPLICANT: Providence Saint John's Health Center

PROJECT LOCATION AND EXISTING ONSITE USES: The campus of Providence Saint John's Health Center is located in Santa Monica's Mid-City Neighborhood in an area bounded by Arizona Avenue to the north, Broadway to the south, 20th Street to the west and 23rd Street to the east as shown on Figure 1. The project sites are located both north and south of Santa Monica Boulevard as shown on Figure 2 and described as follows:

North Campus

- Site 2C, located along Santa Monica Boulevard to the west of the existing Entry Plaza. Site 2C is currently improved with a surface parking lot that is used for valet parking.
- Site 2D/2E, located on the northwest corner of Santa Monica Boulevard and 23rd Street (to the east of the existing Entry Plaza). Site 2D/E is currently improved with a surface parking lot and the former U.S. bank building/current Saint John's Health Center Foundation building at 2221 Santa Monica Boulevard.

- Site 2I, located along 20th Street midblock (1339 20th Street) between the existing medical office building located at 2001 Santa Monica Boulevard and the existing medical office building located at 1301 20th Street. Site 2I is currently improved with the Child and Family Development Center).

South Campus

- The South Campus project sites include a total land area of 225,550 SF (approximately 5.17 acres) located on both sides of 21st Street between Santa Monica Boulevard on the north and Broadway on the south as shown on Figure 2. The South Campus is currently improved with surface parking lots, the John Wayne Cancer Institute, a vacant 10-unit residential building located at 1417-1423 21st Street, and temporary buildings housing magnetic resonance imaging facilities.

PROJECT DESCRIPTION: The Phase II Master Plan will establish the basic parameters guiding Providence development of the Phase II Project, including, without limitation: (a) building placement, (b) heights for all buildings, (c) setbacks for all buildings, (d) stepbacks for all buildings, (e) parking (both subterranean and above-grade), (f) location of uses, (g) vehicular and pedestrian circulation, (h) open space and (i) a Phase II Project phasing plan.

The existing buildings/improvements proposed to be demolished/removed as part of the Phase II Master Plan are identified on Figure 2. These consist of (i) the existing Child and Family Development Center ("CFDC"), (ii) the existing MRI Facility ("MRI"), (iii) the existing Saint John's Health Center Foundation building ("SJF"), (iv) the existing John Wayne Cancer Institute ("JWC"), and (v) the vacant 10-unit residential building ("RB").

As illustrated in Figure 3, the Phase II Master Plan includes the following uses to be located in ten new buildings: Hospital/Health Care, Medical Research Facilities (including a new facility for the John Wayne Cancer Institute), new Child & Family Development Center, Day Care, Health & Wellness Center, Education & Conference Center, Visitor Housing, 10 replacement residential apartment units, as well as opportunities for Health-Related Services, Neighborhood Commercial Uses and Restaurants/Cafés. Figure 3 also shows the proposed building heights for the ten new buildings proposed as part of Phase II, and also depicts the proposed building footprints (including above-grade pedestrian connections between buildings), and proposed open space locations.

Additionally, the Phase II Master Plan proposes to build two new north-south streets (20th Place and 22nd Street) on the South Campus connecting Santa Monica Boulevard with Broadway, a new east-west street on the South Campus connecting 21st Street and the new 20th Place, and to vacate the northern portion of 21st Street between Santa Monica Boulevard and Broadway. Figure 4 depicts the proposed streets, traffic signals, and driveways.

Subterranean parking is proposed beneath each of the Phase II development sites. In addition, on North Campus Site 2I, an above and below-grade parking structure is proposed. Figure 4 also shows the locations of proposed above-grade and subterranean parking. In addition to the above-grade connections for pedestrians shown in Figure 3 (including an enclosed pedestrian walkway above Santa Monica Boulevard for use by patients and caregivers), below-grade connections are proposed for vehicle circulation between various subterranean garages (including under Santa Monica Boulevard) and the transfer of materials/supplies between buildings as shown on Figure 4.

The Phase II Master Plan is proposed to be implemented gradually over 20 years. The applicant contemplates that the applications for these 10 new buildings and related improvements will be submitted in sequence (i.e., in Stages A through E) after approval of the Phase II Master Plan as detailed in Figure 5. The applicant may, as an alternative, elect to pursue Stage C as the first stage of Phase II. In such event, the time limits to have applications deemed complete for other Stages, as provided in Figure 5, may be adjusted accordingly. The total development contemplated under the Phase II Project is summarized in Figure 6. It is

also anticipated that the Phase II Project Master Plan will require an amendment to the Hospital Area Specific Plan.

REVIEW PERIOD: As specified by the State CEQA Guidelines, this Notice of Preparation will be circulated for a minimum 30-day review period. Please go to the City's webpage <https://www.smgov.net/Departments/PCD/Environmental-Reports/St-Johns-Health-Center-EIR/> for the NOP and associated project info. The City welcomes agency and public input during this period regarding the scope and content of environmental information related to your agency's responsibility that must be included in the Draft EIR. **Comments may be submitted, in writing, by 5:30 p.m. on May 11, 2017** and addressed to:

Rachel Kwok, Environmental Planner
City Planning Division
1685 Main Street, Room 212
Santa Monica, California 90407
Telephone: (310) 458-8341
E-mail: rachel.kwok@smgov.net

PUBLIC SCOPING MEETING: A public scoping meeting in an open house format will be held to describe the proposed project, the environmental review process, and to receive public comments on the scope of the EIR. The meeting will be held at the following date and location:

6:00 pm - 7:30 pm
Monday, April 24, 2017
McKinley Elementary School (Auditorium)
2401 Santa Monica Boulevard
Santa Monica, CA 90404

The City will consider all comments, written and oral, in determining the final scope of the evaluation to be included in the EIR.

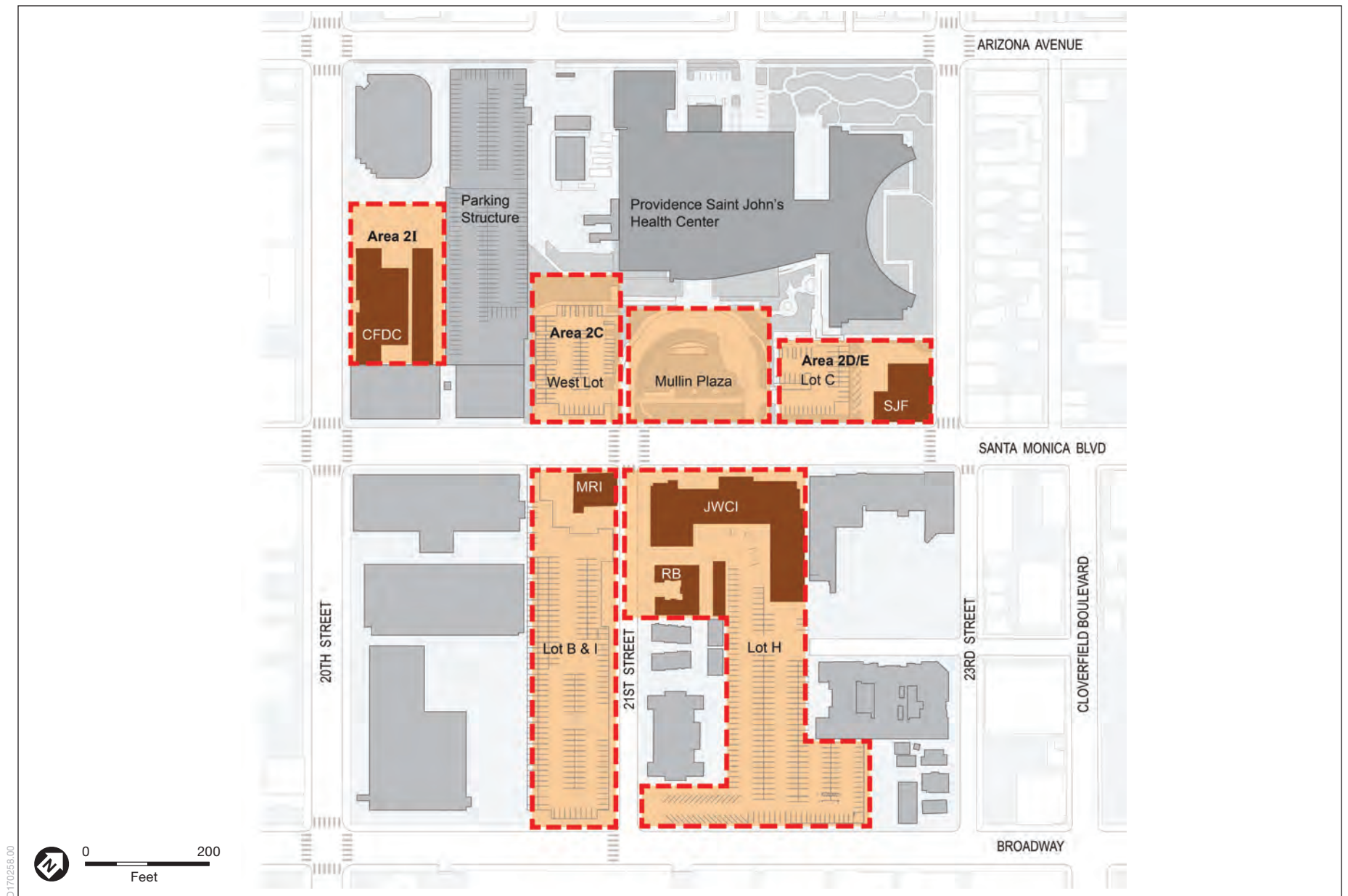
ESPAÑOL: Esto es noticia para la preparación de un informe que describa los posibles efectos ambientales en referencia a la construcción propuesta de un plan maestro de hospital, que puede ser de su interés. Para más información, llame a Carmen Gutierrez al (310) 458-8341



SOURCE: NAIP, 2014 (Aerial).

Providence Saint John's Health Center Phase II Project

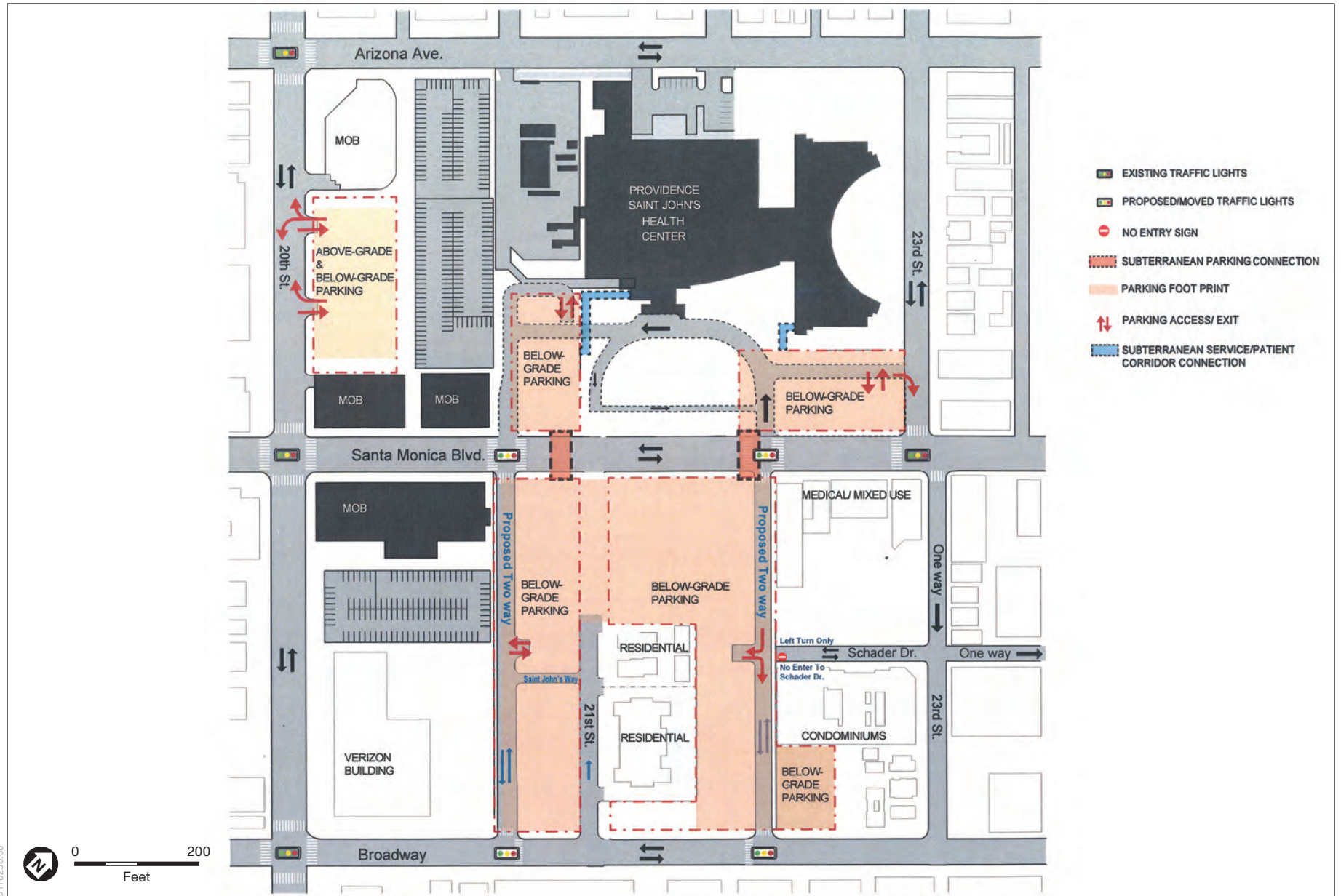
Figure 1
Project Location and Aerial Photograph



SOURCE: Perkins Eastman, 2017

Providence Saint John's Health Center Phase II Project

Figure 2
Phase II Project Area



SOURCE: Perkins Eastman, 2017

Providence Saint John's Health Center Phase II Project

Figure 4
Phase II Circulation and Parking



Providence Saint John's Health Center Phase II Project

Figure 5
Phase II Implementation

PHASE TWO BUILDINGS					
Building Name		Types of DA Vested Uses in Building	Floor Area/ Units per Use*	Max. Building Floor Area	Max. Height**
S1	Child & Family Development Center	Child & Family Development Center	25,500 sf	34,500 sf	47 feet (3 floors)
		Day Care	15,000 sf		
S2	Multifamily Housing	Multifamily Housing	10 units	10 units plus 800 sf commercial	36 feet (3 floors)
		Neighborhood Commercial Uses	800 sf		
S3	West Ambulatory Care & Research Building - South Campus	Hospital/Health Care	65,000 sf	123,000 sf	89 feet (5 floors)
		Medical Research Facilities (JWCI)	115,000 sf		
		Restaurant or Neighborhood Commercial Uses or Health Related Services	5,000 sf		
S4	Education & Conference Center and East Ambulatory Care & Research Building - South Campus	Education & Conference Center	60,000 sf	199,300 sf	105 feet (6 floors)
		Hospital/Health Care	120,000 sf		
		Health & Wellness Center	35,000 sf		
		Medical Research Facilities	50,000 sf		
		Health-Related Services Restaurant or Neighborhood Commercial Uses	10,000 sf		
S5	Visitor Housing	Visitor Housing	30-34 units	38,000 sf	73 feet (6 floors)
	Saint John's Café	Restaurant or Neighborhood Commercial Uses	900 sf	900 sf	17 feet (1 floor)
2C	West Ambulatory & Acute Care Building - North Campus	Hospital/Health Care	115,000 sf***	112,000 sf above-grade 6,000 sf below-grade***	95 feet (5 floors)
		Health-Related Services Restaurant or Neighborhood Commercial Uses	5,000 sf		
2D/E	East Ambulatory & Acute Care Building - North Campus	Hospital/Health Care	90,000 sf****	70,000 sf above-grade 20,000 sf below-grade****	75 feet (4 floors)
2I	Parking Structure	Parking	157,000 sf	160,000 sf	56 feet (5 floors)
		Health-Related Services	3,000 sf		
	Mullin Plaza Café	Restaurant or Neighborhood Commercial Uses	1,500 sf	1,500 sf	17 feet (1 floor)

*For some buildings, the sum of the maximum floor areas for the Vested Uses within the building exceed the overall building floor area in order to allow flexibility with respect to the location and amount of certain Vested Uses.

**Heights do not include projections for roof elements, including mechanical equipment, exhaust pipes, elevator overrides, HVAC and other equipment.

***Includes 2,200 sf pedestrian walkway across SM Boulevard connecting 2C to S3, 2,000 sf pedestrian walkway connecting 2C to the existing Howard Keck Diagnostic & Treatment Center, and 3,000 sf subterranean connection between 2C and the existing Howard Keck Diagnostic & Treatment Center.

****Includes 3,000 sf pedestrian walkway connecting 2D/E to the existing Chan Soon-Shiong Center for Life Sciences and 650 sf subterranean connection between 2D/E and the existing Chan Soon-Shiong Center.

SOURCE: Perkins Eastman, 2017

Providence Saint John's Health Center Phase II Project

Figure 6
Phase II Development Summary

Appendix A-2

Scoping Meeting Materials



SAINT JOHN'S HEALTH CENTER PHASE II PROJECT EIR PUBLIC SCOPING MEETING

Monday, April 24, 2017
6:00 PM to 7:30 PM
McKinley Elementary School

A G E N D A

I. Welcome and Introductions

City Staff, *City Planning*

- Introductions and meeting purpose
- Agenda overview

II. Presentation – Project Overview

City Staff, *City Planning*

- Project overview

III. Presentation – CEQA Overview

ESA PCR

- CEQA overview
- EIR process
- Issues to be studied in the Draft EIR
- Opportunities for public comment

IV. Provide Public Comments/Open House

Comments can also be submitted in writing by May 11, 2017:

- Comment forms provided – return to staff
- Mail/drop-off at City Hall:

Rachel Kwok
City of Santa Monica – City Planning Division
1685 Main Street – Room 212
Santa Monica, CA 90401

- E-mail: Rachel.Kwok@smgov.net

City of Santa Monica

EIR SCOPING MEETING

Date: 4/14/2017

Project Name: Revised Saint John's Health Center



Thank you for attending today's meeting. To receive updates on this project, please provide us with your information below.

This document may be considered a public record and as such any information provided on it may be made available to any member of the public.

Name (please print)	Mailing Address	Organization (optional)	E-mail
Joe Woods	418 17th St SM 90402	Green Plaza	mkw1935@yahoo.com
JOYCE SMALL	1433 21ST ST #A SANTA MONICA 90404	_____	jhappy small@yahoo.com
Jesus Hernandez	1423 2nd St. Santa Monica	community cupp. of Santa Monica	jhernandezcommunitycorp.org
Ellen Hanna	1218 9th St	SM Mid City Neighborhood	elhanna@gmail.com
Oliver Barry	1441 21st St	community person	oliverbarry@gmail.com
MICHELE PRINCE	2502 ARIZONA #5	RESIDENT	micheleprince@gmail.com
LINA LEE	1242 20th Street		ms.lina.lee@gmail.com

EIR SCOPING MEETING

Date: 4/24/17

Project Name: Providence SJHC



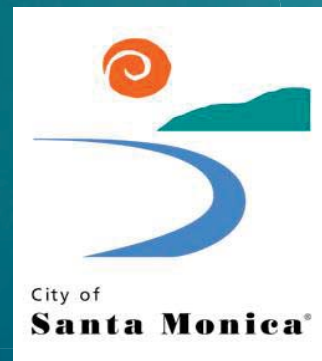
Thank you for attending today's meeting. To receive updates on this project, please provide us with your information below.

This document may be considered a public record and as such any information provided on it may be made available to any member of the public.

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Providence Saint John's Health Center Phase II Project

EIR Scoping Meeting



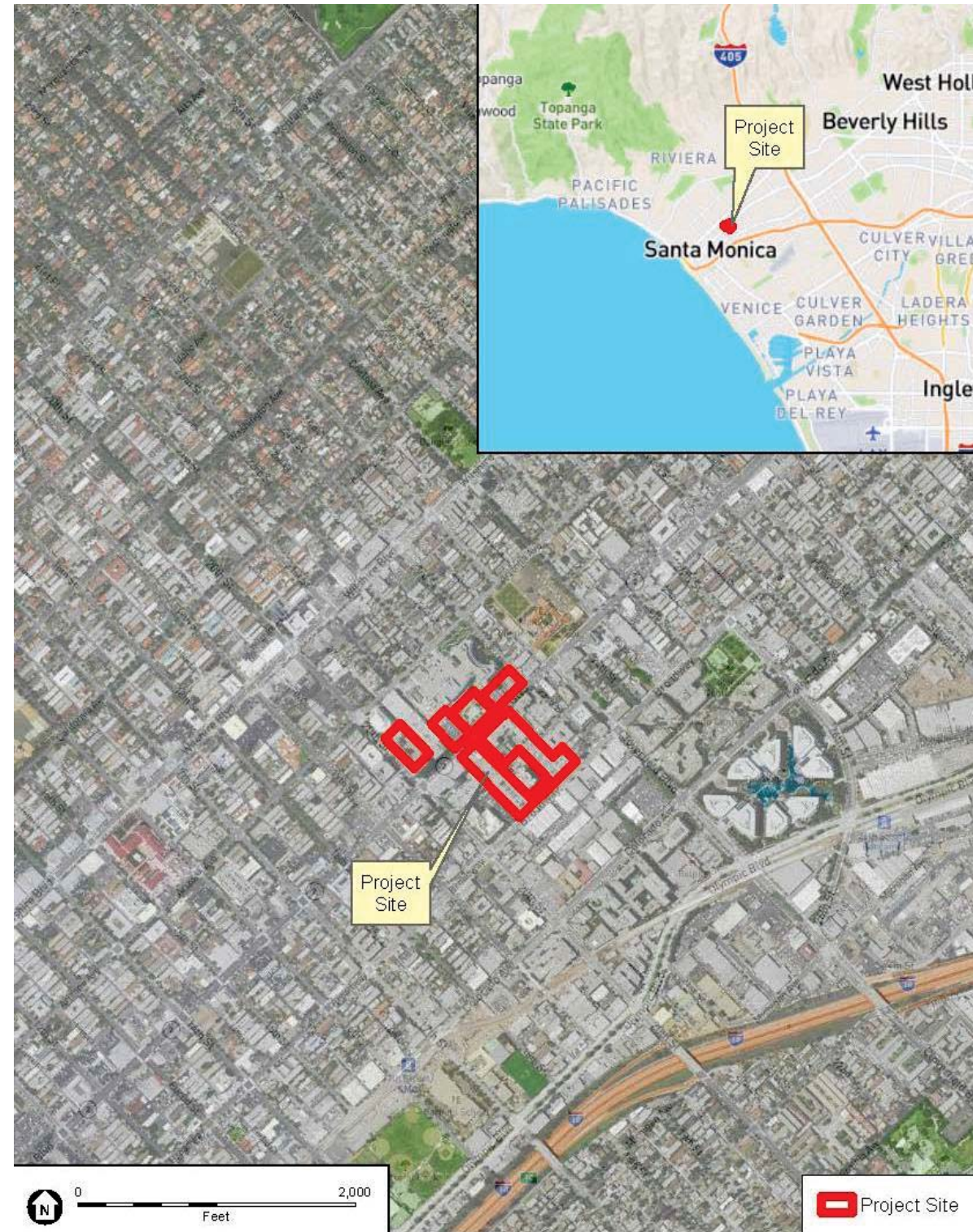
City of Santa Monica



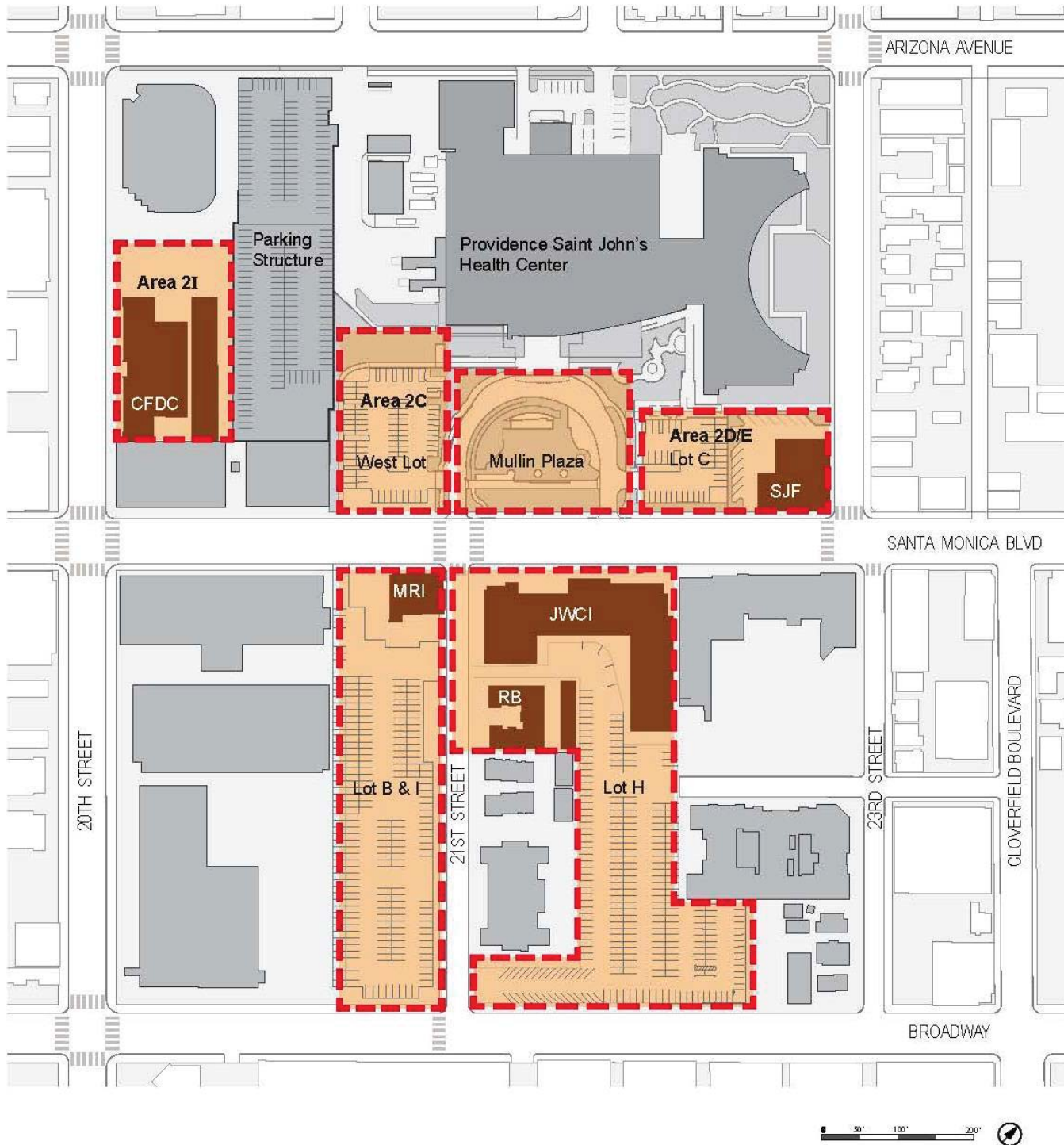
ESA (EIR consultant)

Introductions

- ▶ City of Santa Monica Planning Staff
 - ▶ Jing Yeo, City Planning Manager
 - ▶ Roxanne Tanemori, Principal Planner (Project Manager)
 - ▶ Rachel Kwok, Environmental Planner
- ▶ ESA PCR (EIR consultant/preparer)
 - ▶ David Crook, Senior Managing Associate
 - ▶ Jay Ziff, Principal
- ▶ Fehr and Peers
 - ▶ Tom Gaul
 - ▶ Netai Basu



Project Location



Project Area – North and South Campus

Project Location



Project Site Photos

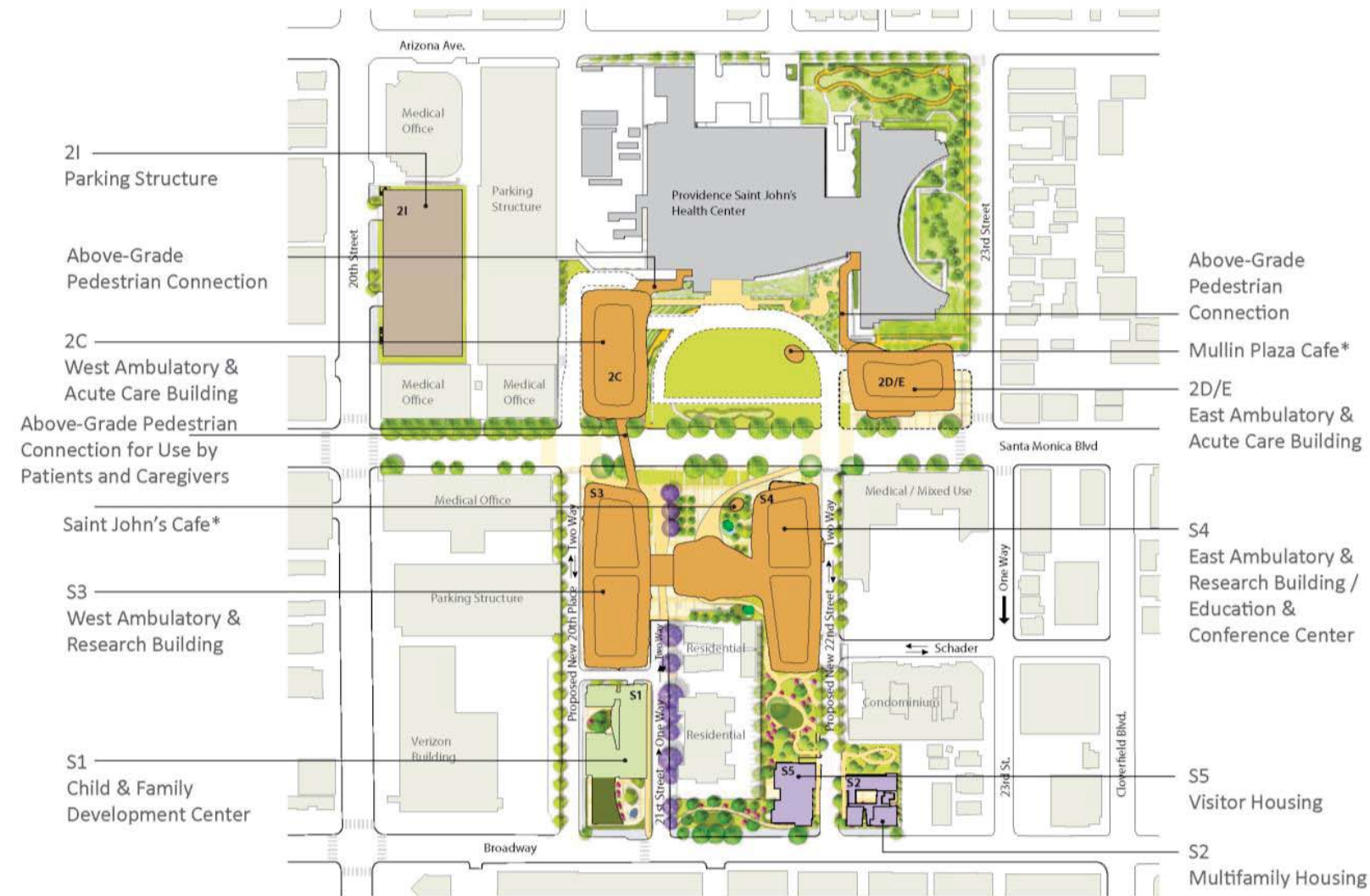




Project Site Photos



Project Site Photos



*Cafe will be located within the plaza area, but the exact location is to be determined.



Project Site Plan

PHASE TWO BUILDINGS				
Building Name	Types of DA Vested Uses in Building	Floor Area/ Units per Use*	Max. Building Floor Area	Max. Height**
S1 Child & Family Development Center	Child & Family Development Center	25,500 sf	34,500 sf	47 feet (3 floors)
	Day Care	15,000 sf		
S2 Multifamily Housing	Multifamily Housing	10 units	10 units plus 800 sf commercial	36 feet (3 floors)
	Neighborhood Commercial Uses	800 sf		
S3 West Ambulatory Care & Research Building - South Campus	Hospital/Health Care	65,000 sf	123,000 sf	89 feet (5 floors)
	Medical Research Facilities (JWCI)	115,000 sf		
	Restaurant or Neighborhood Commercial Uses or Health Related Services	5,000 sf		
S4 Education & Conference Center and East Ambulatory Care & Research Building - South Campus	Education & Conference Center	60,000 sf	199,300 sf	105 feet (6 floors)
	Hospital/Health Care	120,000 sf		
	Health & Wellness Center	35,000 sf		
	Medical Research Facilities	50,000 sf		
	Health-Related Services Restaurant or Neighborhood Commercial Uses	10,000 sf		
S5 Visitor Housing	Visitor Housing	30-34 units	38,000 sf	73 feet (6 floors)
Saint John's Café	Restaurant or Neighborhood Commercial Uses	900 sf	900 sf	17 feet (1 floor)
2C West Ambulatory & Acute Care Building - North Campus	Hospital/Health Care	115,000 sf***	112,000 sf above-grade 6,000 sf below-grade***	95 feet (5 floors)
	Health-Related Services Restaurant or Neighborhood Commercial Uses	5,000 sf		
2D/E East Ambulatory & Acute Care Building - North Campus	Hospital/Health Care	90,000 sf****	70,000 sf above-grade 20,000 sf below-grade****	75 feet (4 floors)
2I Parking Structure	Parking	157,000 sf	160,000 sf	56 feet (5 floors)
	Health-Related Services	3,000 sf		
Mullin Plaza Café	Restaurant or Neighborhood Commercial Uses	1,500 sf	1,500 sf	17 feet (1 floor)

*For some buildings, the sum of the maximum floor areas for the Vested Uses within the building exceed the overall building floor area in order to allow flexibility with respect to the location and amount of certain Vested Uses.

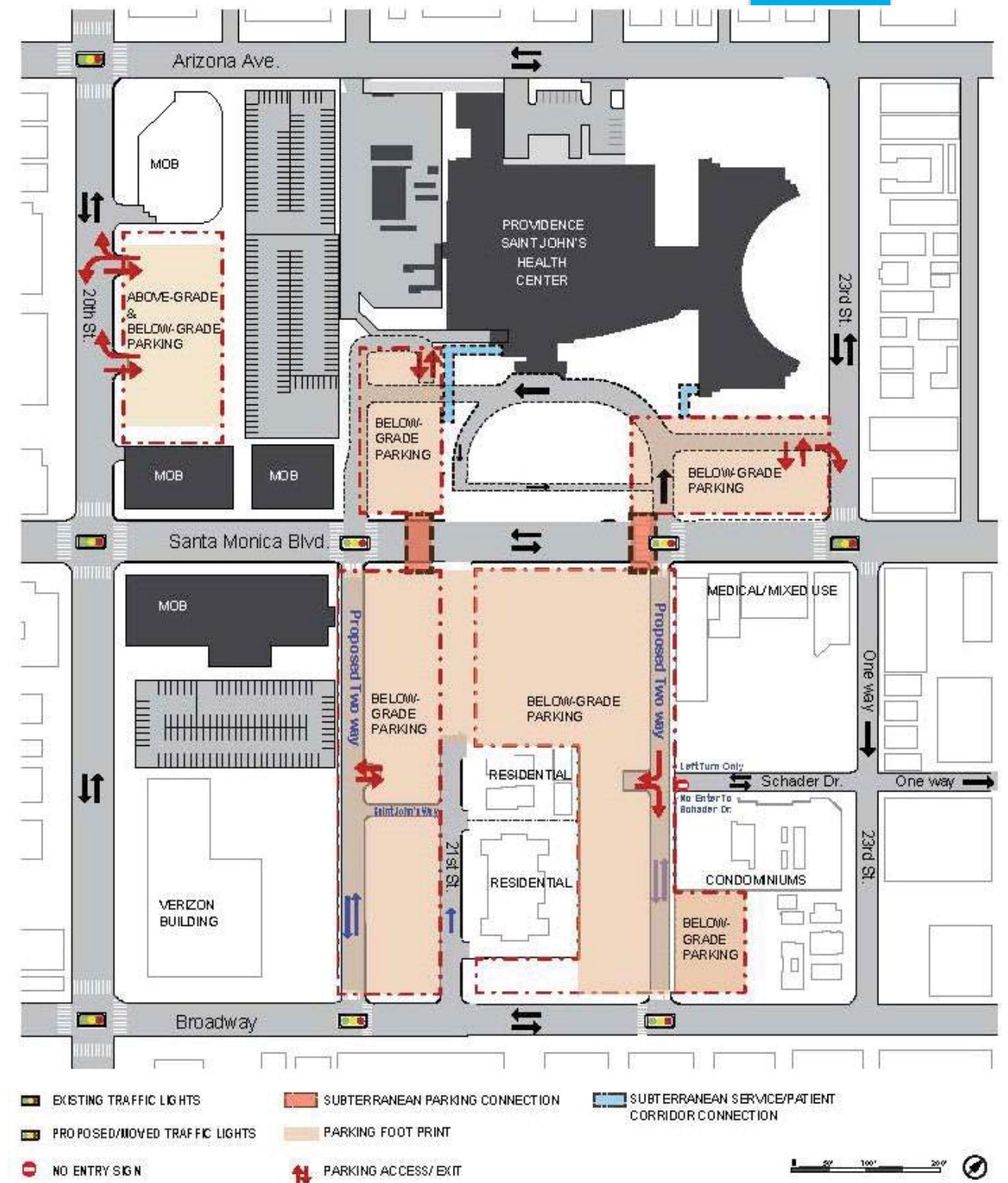
**Heights do not include projections for roof elements, including mechanical equipment, exhaust pipes, elevator overrides, HVAC and other equipment.

***Includes 2,200 sf pedestrian walkway across SM Boulevard connecting 2C to S3, 2,000 sf pedestrian walkway connecting 2C to the existing Howard Keck Diagnostic & Treatment Center, and 3,000 sf subterranean connection between 2C and the existing Howard Keck Diagnostic & Treatment Center.

****Includes 3,000 sf pedestrian walkway connecting 2D/E to the existing Chan Soon-Shiong Center for Life Sciences and 650 sf subterranean connection between 2D/E and the existing Chan Soon-Shiong Center.

Project Development Summary

Phase II Circulation and Parking



Renderings



Renderings



Renderings



Renderings



Renderings



Renderings



Renderings



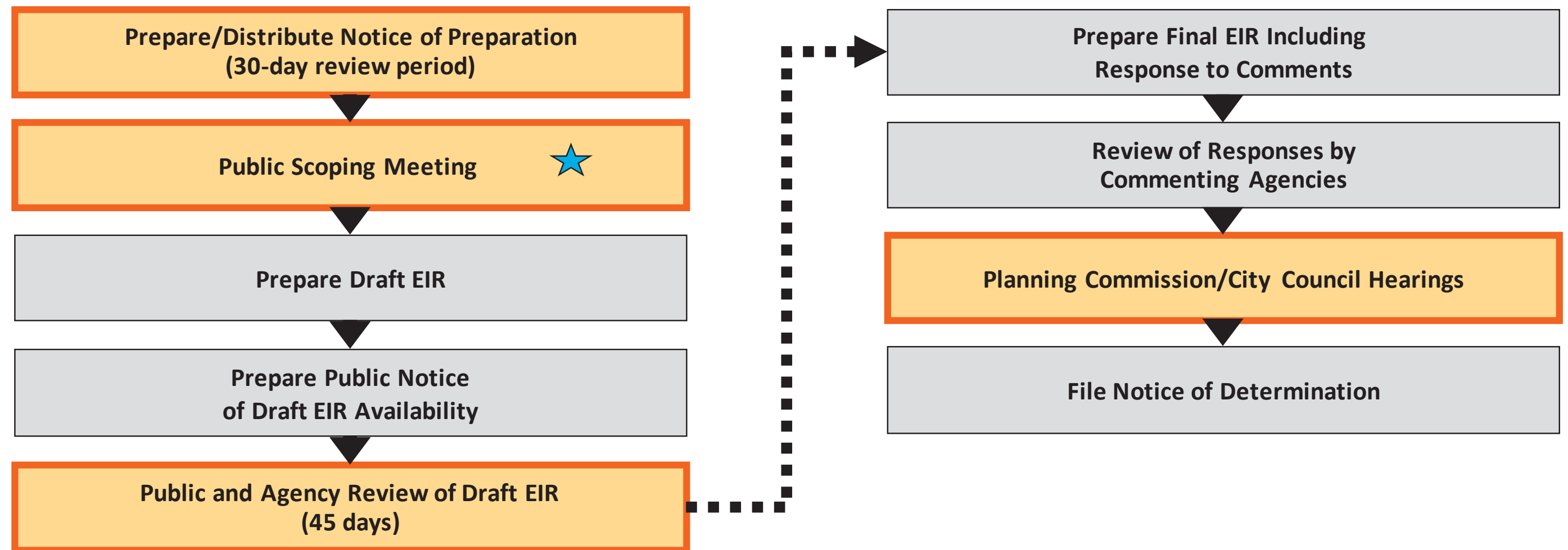
Renderings



California Environmental Quality Act (CEQA)

- ▶ Purpose: To inform decision-makers and the public of a project's potential physical effects on the environment
 - ▶ Applies to discretionary projects
 - ▶ Increase public understanding of and participation in environmental review
- ▶ As required by CEQA, an EIR discloses potential impacts on the environment
 - ▶ An EIR is an informational document that represents "good faith" effort to disclose potential environmental impacts and identify ways to lessen such impacts
 - ▶ An EIR does not approve or deny a project
 - ▶ Identifies ways to avoid or reduce potential significant environment impacts through feasible mitigation measures or alternatives

EIR Process Overview



 = Opportunities for Public Input

Purpose of Scoping Meeting

- ▶ Beginning of CEQA Review process
- ▶ Inform the public of the proposed project and EIR process
- ▶ Receive public comments regarding environmental topics, issues of concerns and alternatives to be evaluated in the EIR
- ▶ Comments should focus on the potential environmental impacts of the proposed project

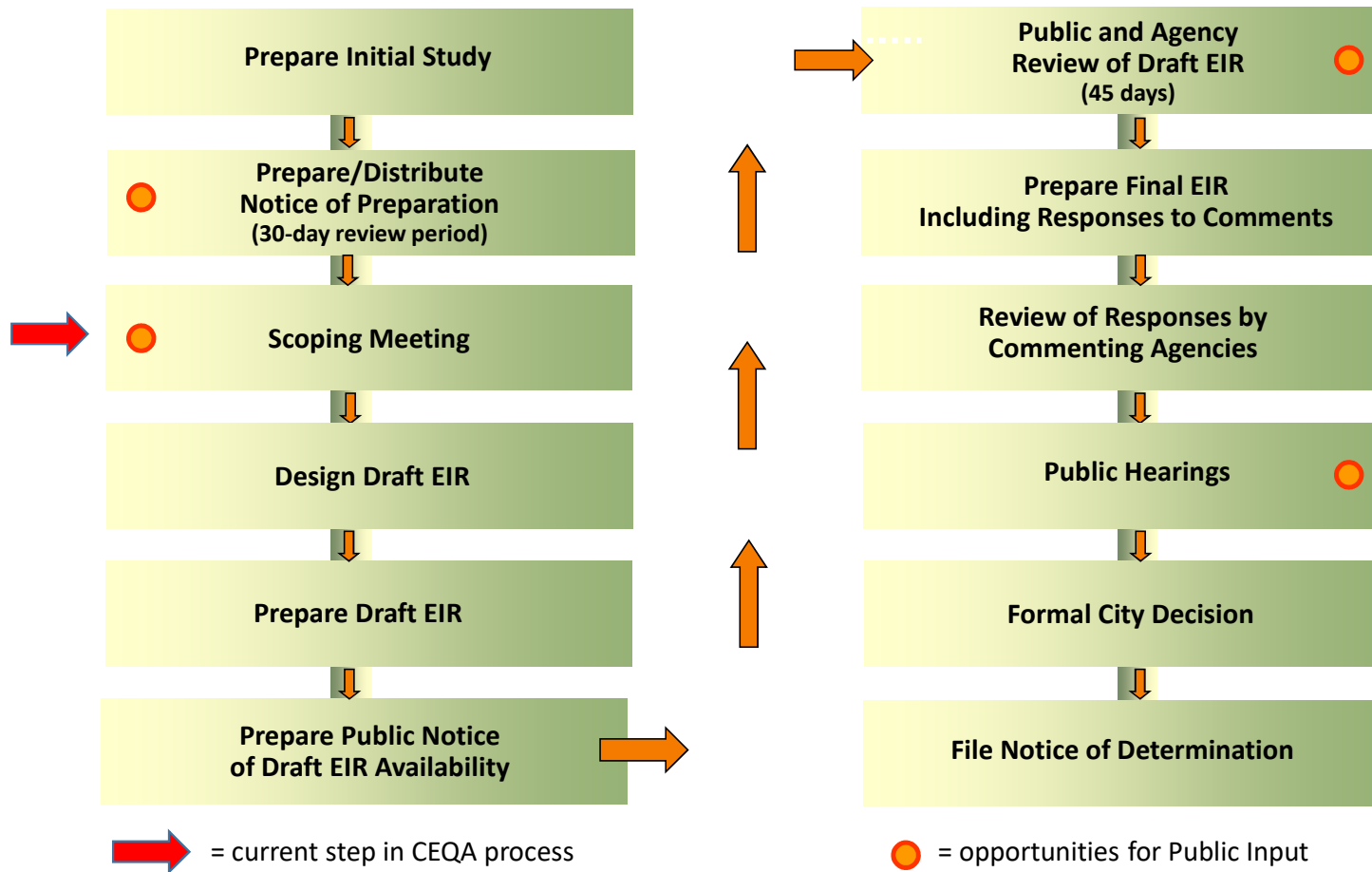
Environmental Topics to Be Analyzed

- ▶ Aesthetics
 - ▶ Views, Visual Resources, Light/Glare, Shade/Shadows
- ▶ Air Quality
 - ▶ Construction emissions, Operational emissions from vehicles and other on-site sources
- ▶ Cultural Resources
 - ▶ Historic Resources, archeological, and paleontological resources
- ▶ Geology/Soils
 - ▶ Seismic groundshaking, soil stability
- ▶ Greenhouse Gases
 - ▶ Construction emissions, Operational emissions
- ▶ Hazards/Hazardous Materials
 - ▶ Use and disposal of hazardous materials; groundwater/soil contamination
- ▶ Hydrology/Water Quality
 - ▶ Polluted runoff, on-site flooding
- ▶ Land Use and Planning
- ▶ Public Services
 - ▶ Police, fire, parks, schools, and libraries
- ▶ Transportation/Traffic
 - ▶ Intersection impacts, vehicles miles traveled, mobility for all modes
- ▶ Utilities
 - ▶ Water, wastewater, energy, solid waste

Please send
comments by
May 11, 2017 in
writing to:

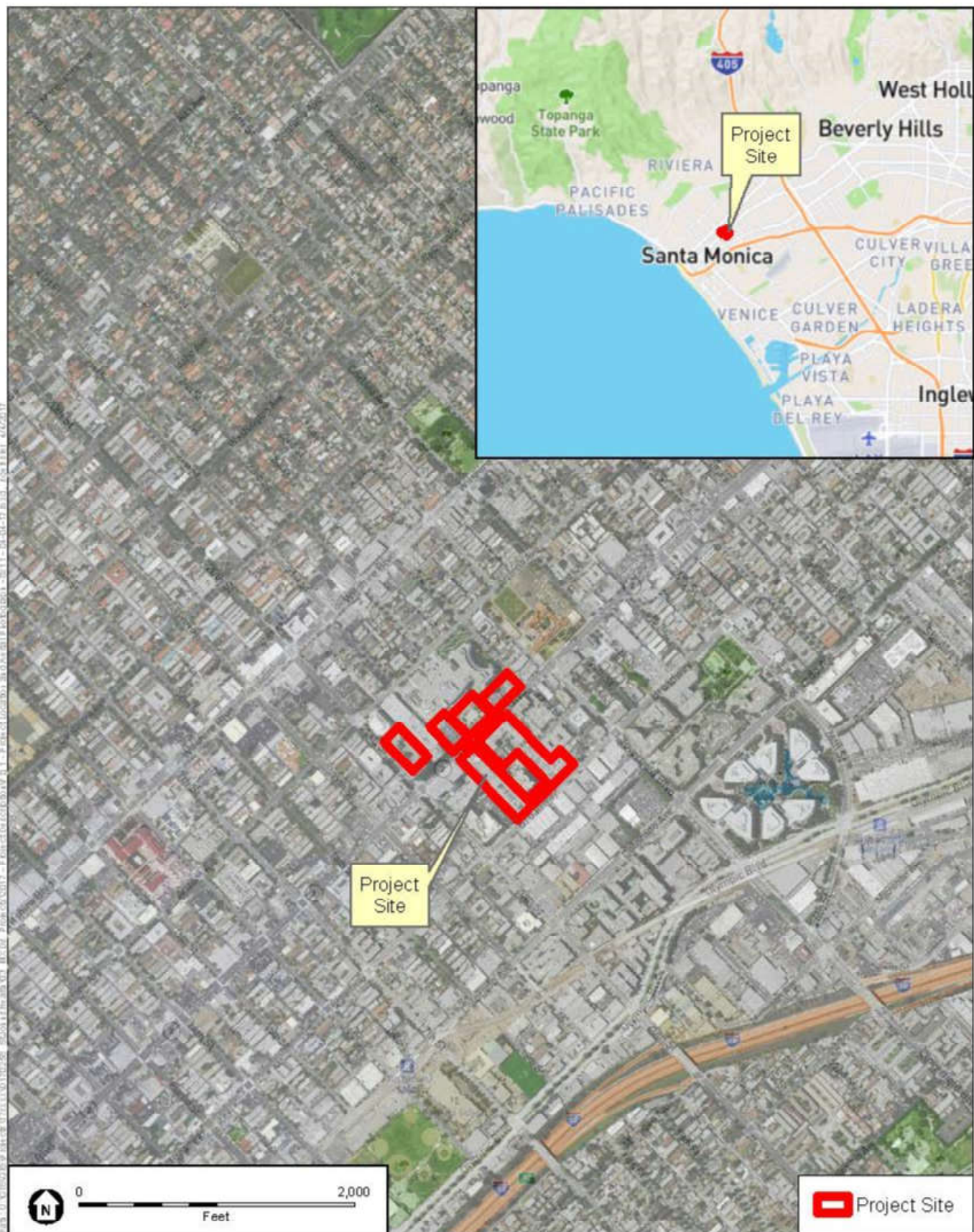
Rachel Kwok
City Planning Division
City of Santa Monica
1685 Main Street, Room 212
Santa Monica, CA 90401
Email: Rachel.Kwok@smgov.net

CEQA Process Flow Chart



Topics To Be Addressed in Environmental Impact Report

- Aesthetics
 - Views, Visual Resources, Light/Glare, Shade/Shadows
- Air Quality
 - Construction emissions, Operational emissions from vehicles and other on-site sources
- Cultural Resources
 - Historic Resources, archeological, and paleontological resources
- Geology/Soils
 - Seismic groundshaking, soil stability
- Greenhouse Gas Emissions
 - Construction emissions, Operational emissions
- Hazards/Hazardous Materials
 - Use and disposal of hazardous materials, groundwater/soil contamination
- Land Use and Planning
 - Plan consistency, land use compatibility
- Noise
 - Construction noise and vibration, operational noise and vibration
- Population/Housing/Employment
 - Growth inducement, consistency with growth projections
- Public Services
 - Fire/EMS, police, parks, schools, libraries
- Transportation/Traffic & Parking
 - Intersection capacity, circulation/access, parking supply
- Utilities/Service Systems
 - Water supply, wastewater treatment capacity, solid waste disposal and recycling



SOURCE: NAIP, 2014 (Aerial).

Providence Saint John's Health Center Phase II Project

Figure 1
Project Location and Aerial Photograph

PHASE TWO BUILDINGS					
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****Includes 3,000 sf pedestrian walkway connecting 2D/E to the existing Chan Soon-Shiong Center for Life Sciences and 650 sf subterranean connection between 2D/E and the existing Chan Soon-Shiong Center.

Figure 2 Phase Two Buildings - Proposed Floor Areas, Heights, and Uses

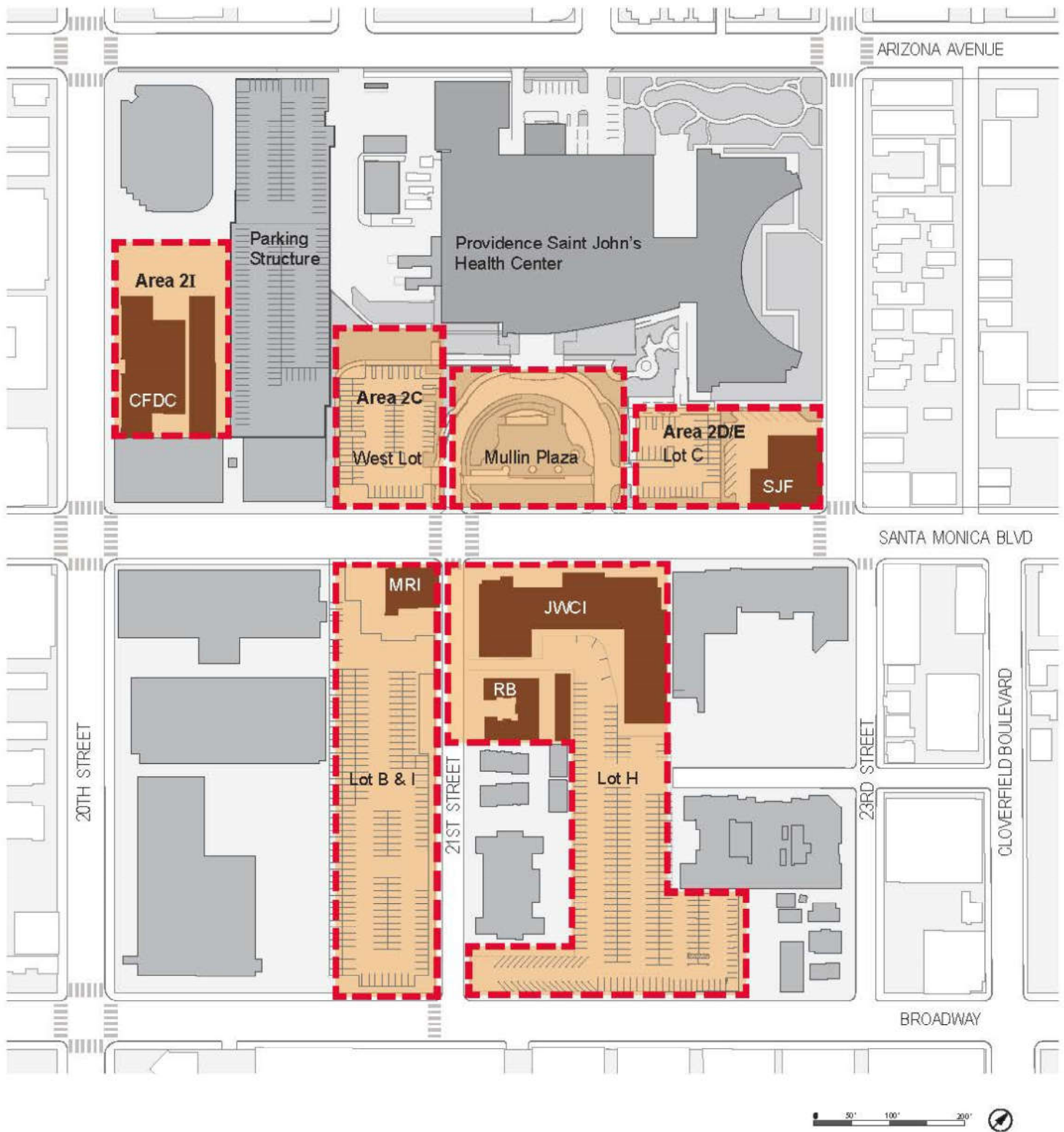


Figure 1 Existing Buildings/Improvements Proposed to be Demolished/Removed from Phase Two Sites

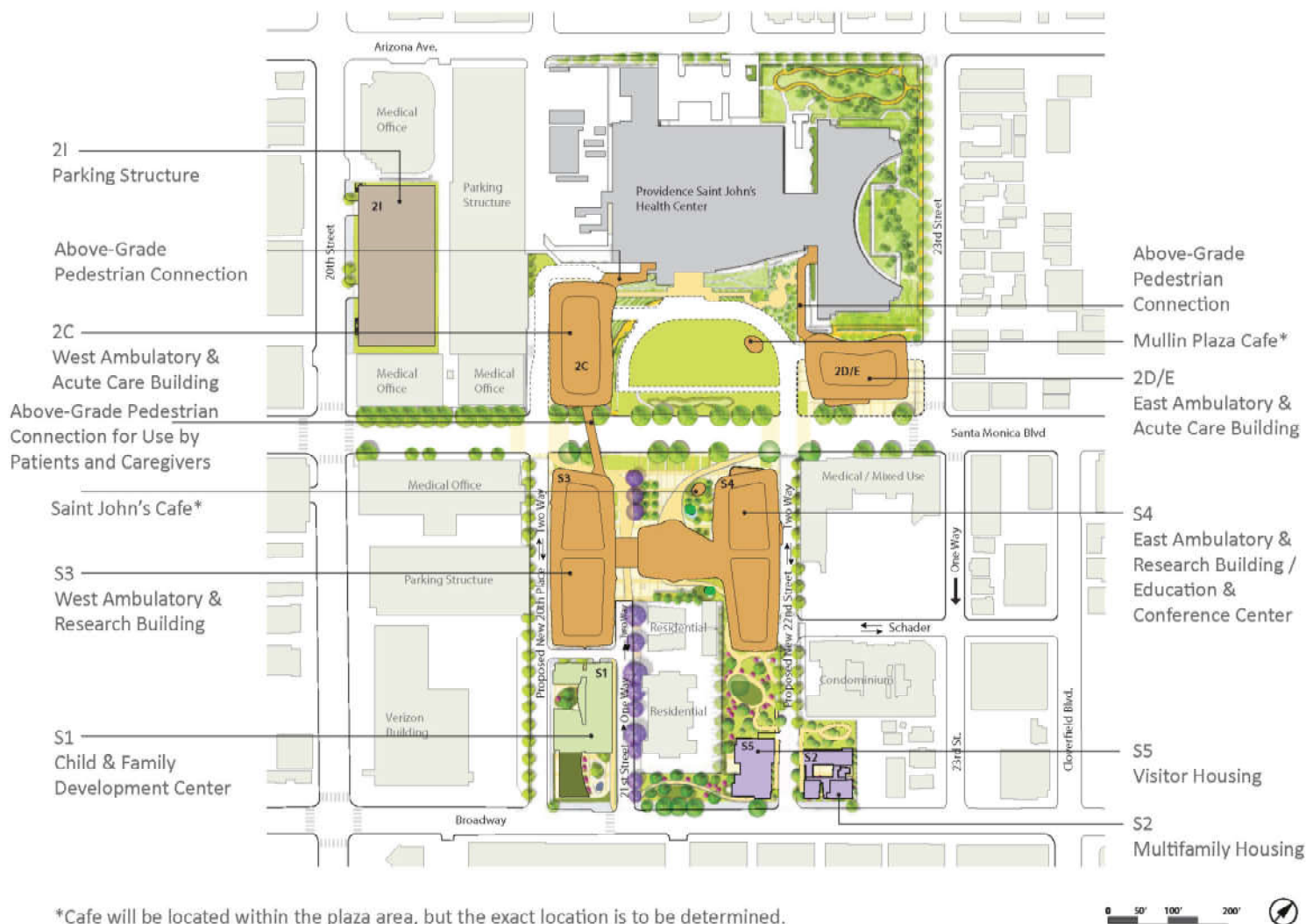


Figure 3 Approximate Locations for Phase Two Improvements

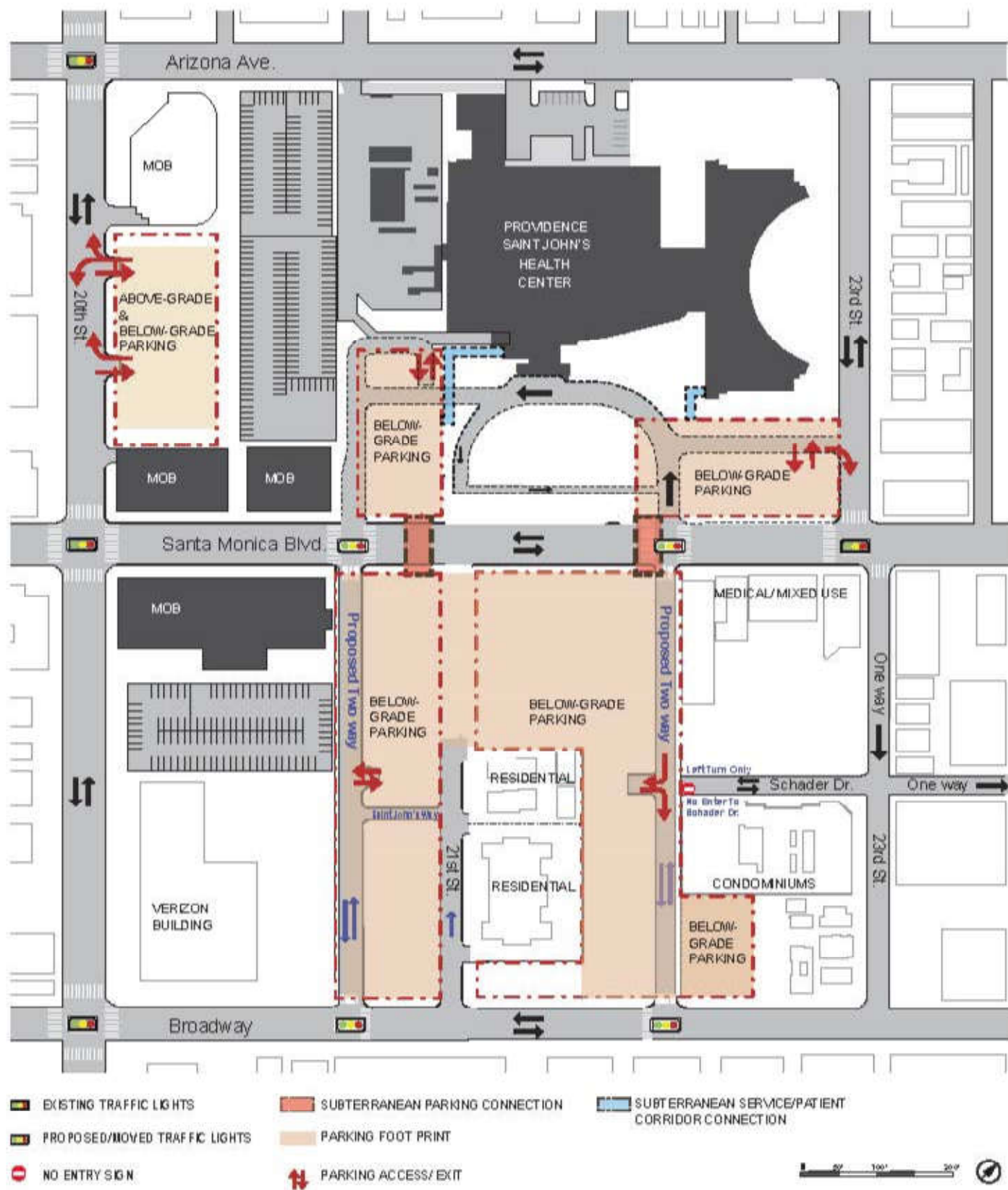


Figure 4 Circulation and Parking



Figure 30.1 Ground-level view from Mullin Plaza looking southeast across Santa Monica Boulevard toward Saint John's Square, with the Education & Conference Center in the middle, between the East and West Ambulatory Care & Research B



Ground-level view from Mullin Plaza looking south toward Saint John's Square and South Campus, with the pedestrian bridge over Santa Monica Boulevard



Figure 32.1 Ground-level view from Saint John's Square looking north toward Mullin Plaza and the North Campus, with the East Ambulatory Care & Research Building in the right foreground



Ground-level view from the lobby of the Education & Conference Center, looking northwest toward Saint John's Square, Mullin Plaza and the North Campus



Figure 34.1 Ground-level view at Broadway looking west, with the Multifamily and Visitor Housing in the right foreground, and the Child & Family Development Center in the left background



Ground-level view looking east at the Visitor Housing in the right foreground and the Multifamily Housing in the left background



Figure 36.1 Ground-level view of the intersection of Broadway and the new 22nd Street looking north at the Multifamily Housing



View of proposed parking structure along 20th Street on the North Campus. (Rendering shows original proposed height with 6 above-grade stories, revised Phase Two proposal is to reduce the height to 5 above-grade stories.)

Appendix A-3

NOP and Scoping Meeting Comments



Edmund G. Brown Jr.
Governor

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



Ken Alex
Director

Notice of Preparation

April 10, 2017

To: Reviewing Agencies

Re: Providence Saint John's Health Center Phase II Project
SCH# 2017041030

Attached for your review and comment is the Notice of Preparation (NOP) for the Providence Saint John's Health Center Phase II Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Rachel Kwok
City of Santa Monica
1685 Main Street, Room 212
Santa Monica, CA 90407

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

JP

Distribution List

County: Los Angeles

SCH# **2017041030**

<input type="checkbox"/> <u>Resources Agency</u> Laurie Harnsberger	<input type="checkbox"/> <u>Caltrans, District 8</u> Mark Roberts	<input type="checkbox"/> <u>Regional Water Quality Control Board (RWQCB)</u>
<input type="checkbox"/> <u>Dept. of Boating & Waterways</u> Denise Peterson	<input type="checkbox"/> <u>Caltrans, District 9</u> Gayle Rosander	<input type="checkbox"/> <u>RWQCB 1</u> Cathleen Hudson
<input type="checkbox"/> <u>California Coastal Commission</u> Elizabeth A. Fuchs	<input type="checkbox"/> <u>Caltrans, District 10</u> Tom Dumas	<input type="checkbox"/> <u>RWQCB 2</u> Environmental Document Coordinator
<input type="checkbox"/> <u>Colorado River Board</u> Lisa Johansen	<input type="checkbox"/> <u>Caltrans, District 11</u> Jacob Armstrong	<input type="checkbox"/> <u>San Francisco Bay Region (2)</u>
<input type="checkbox"/> <u>Dept. of Conservation</u> Cristina Chan	<input type="checkbox"/> <u>Caltrans, District 12</u> Maureen El Harake	<input type="checkbox"/> <u>RWQCB 3</u> Central Coast Region (3)
<input type="checkbox"/> <u>California Energy Commission</u> Eric Knight	<input type="checkbox"/> <u>Caltrans, District 13</u> Maureen El Harake	<input checked="" type="checkbox"/> <u>RWQCB 4</u> Teresa Rodgers
<input type="checkbox"/> <u>Cal Fire</u> Dan Foster	<input type="checkbox"/> <u>Caltrans, District 14</u> Maureen El Harake	<input type="checkbox"/> <u>RWQCB 5</u> Central Valley Region (5)
<input type="checkbox"/> <u>Central Valley Flood Protection Board</u> James Herota	<input type="checkbox"/> <u>Caltrans, District 15</u> Maureen El Harake	<input type="checkbox"/> <u>RWQCB 5F</u> Central Valley Region (5) Fresno Branch Office
<input type="checkbox"/> <u>Office of Historic Preservation</u> Ron Parsons	<input type="checkbox"/> <u>Caltrans, District 16</u> Maureen El Harake	<input type="checkbox"/> <u>RWQCB 5R</u> Central Valley Region (5) Redding Branch Office
<input type="checkbox"/> <u>Dept. of Parks & Recreation</u> Ron Parsons	<input type="checkbox"/> <u>Caltrans, District 17</u> Maureen El Harake	<input type="checkbox"/> <u>RWQCB 6</u> Lahontan Region (6)
<input type="checkbox"/> <u>California Department of Resources, Recycling & Recovery</u> Sue O'Leary	<input type="checkbox"/> <u>Caltrans, District 18</u> Maureen El Harake	<input type="checkbox"/> <u>RWQCB 6V</u> Lahontan Region (6) Victorville Branch Office
<input type="checkbox"/> <u>S.F. Bay Conservation & Dev't. Comm.</u> Steve Goldbeck	<input type="checkbox"/> <u>Caltrans, District 19</u> Maureen El Harake	<input type="checkbox"/> <u>RWQCB 7</u> Colorado River Basin Region (7)
<input type="checkbox"/> <u>Dept. of Water Resources Agency</u> Nadell Gayou	<input type="checkbox"/> <u>Caltrans, District 20</u> Maureen El Harake	<input type="checkbox"/> <u>RWQCB 8</u> Santa Ana Region (8)
<input type="checkbox"/> <u>Land and Game</u>	<input type="checkbox"/> <u>Caltrans, District 21</u> Maureen El Harake	<input type="checkbox"/> <u>RWQCB 9</u> San Diego Region (9)
<input type="checkbox"/> <u>Dept. of Fish & Wildlife</u> Scott Flint	<input type="checkbox"/> <u>Caltrans, District 22</u> Maureen El Harake	<input type="checkbox"/> <u>Other OSHPD</u>
<input type="checkbox"/> <u>Environmental Services Division</u>	<input type="checkbox"/> <u>Caltrans, District 23</u> Maureen El Harake	<input type="checkbox"/> <u>Santa Monica Bay Conservancy Restoration Commission</u>
<input type="checkbox"/> <u>Fish & Wildlife Region 1</u> Curt Babcock	<input type="checkbox"/> <u>Caltrans, District 24</u> Maureen El Harake	

DEPARTMENT OF TRANSPORTATION

DISTRICT 7- OFFICE OF REGIONAL PLANNING

100 S. MAIN STREET, SUITE 100

LOS ANGELES, CA 90012

PHONE (213) 897-6536

FAX (213) 897-1337

TTY 711

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17 APR 27 11:42

April 24, 2017

Mr. Rachel Kwok
City of Santa Monica
1685 Main Street, Room 212
Santa Monica, CA 90407

RE: Providence Saint John's Health
Center Phase II Project
Vic: LA-2, 10
SCH#2017051030
GTS#07-LA-2017-00830ME-NOP

Dear Mr. Kwok:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Phase II Master Plan will establish the basic parameters guiding Providence development of the Phase II project, including without limitation: (a) building placement, (b) heights for all buildings, (c) setbacks for all buildings (d) setbacks for all buildings, (e) parking (both subterranean and above grade), (f) location of uses, (g) vehicular and pedestrian circulation, (h) open space and (i) a Phase II Project phasing plan.

Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by eliminating consideration of delay- and capacity- based metrics such as level of service (LOS) and instead focusing analysis on another metric of impact. The Governor's Office of Planning and Research (OPR) is currently updating its CEQA Guidelines to implement SB 743 (https://www.opr.ca.gov/s_sb743.php) and is proposing that vehicle miles traveled be the primary metric used in identifying transportation impacts.

The City should refer the project's traffic consultant to OPR's website, guidelines on evaluating transportation impacts in CEQA if VMT methodology is used:

https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf

If the City decides to use Level of Service (LOS) when preparing the traffic analysis on the State facilities, please refer the project's traffic consultant to Caltrans' traffic study guide Website:

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

To assist in evaluating the impacts of this project on State transportation facilities, a traffic study should be prepared prior to preparing the Draft Environmental Impact Report (DEIR). Please refer the project's traffic consultant to Caltrans' traffic study guide Website:

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

Listed below are elements of what is generally expected in the traffic study:

1. Key intersections and any traffic impact including, but not limited to SR-2 (Santa Monica Boulevard and Interstate-10).
2. Traffic volume counts to include anticipated AM and PM peak-hour volumes.
3. Level of service (LOS) before and during construction.
4. A brief traffic discussion showing ingress/egress, turning movements, and the directional flow of project vehicle trips.
5. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts, including sharing of mitigation costs.

We look forward to reviewing the traffic study and expect to receive a copy from the State Clearinghouse when the DEIR is completed. If you would like to expedite the review process or receive early feedback from Caltrans, please feel free to send a copy of the DEIR directly to our office.

If you have any questions regarding these comments, please contact project coordinator Ms. Miya Edmonson, at (213) 897-6536 and refer to GTS# LA-2016-00830ME.

Sincerely,



DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
Fax (916) 373-5471
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>
Twitter: @CA_NAHC



April 13, 2017

Rachel Kwok
City of Santa Monica
1685 Main Street, Room 212
Santa Monica, CA 90407

sent via e-mail to: Rachel.kwok@smgov.net

RE: SCH# 2017041030; Providence Saint John's Health Center Phase II Project, Los Angeles County, California

Dear Ms. Kwok:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for Draft Environmental Impact Report for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a **separate category of cultural resources**, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf>. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

This process should be documented in the Cultural Resources section of your environmental document.

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

- b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Sincerely,

Associate Governmental Program Analyst



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

May 4, 2017

Rachel Kwok, Environmental Planner
City Planning Division
1685 Main Street, Room 212
Santa Monica, CA 90407

RE: Providence St. John's Health Center Phase II Project Master Plan – Notice of Preparation for a Draft Environmental Impact Report

Dear Ms. Kwok,

Thank you for the opportunity to comment on the proposed Master Plan for the Providence St. John's Health Center Phase II Project (Project) located at 2121 Santa Monica Blvd. in the City of Santa Monica. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed Project.

Metro is committed to working with stakeholders across the County to support the development of transit oriented communities (TOCs). TOCs are built by considering transit within a broader community and creating vibrant, compact, walkable, and bikeable places centered around transit stations and hubs with the goal of encouraging the use of transit and other alternatives to driving. Metro looks forward to collaborating with local municipalities, developers, and other stakeholders in their land use planning and development efforts, and to find partnerships that support TOCs across Los Angeles County.

Project Description

The campus of Providence Saint John's Health Center is located in Santa Monica's Mid-City Neighborhood in an area bounded by Arizona Ave. to the north, Broadway to the south, 20th St. to the west, and 23rd St. to the east. The Phase II Master Plan will establish the basic parameters guiding the Providence development of the Phase II Project, including, without limitation: building placement and heights; setbacks and stepbacks; vehicular and pedestrian circulation; parking and open space; and a Phase II Project phasing plan.

Existing buildings/improvements proposed to be demolished include: (i) the Child and Family Development Center, (ii) the existing MRI Facility, (iii) the existing Saint John's Health Center Foundation building, (iv) the existing John Wayne Cancer Institute, and (v) the vacant 10-unit building. These will be replaced with ten new buildings housing healthcare, research, visitor housing, residential apartment units, and neighborhood commercial uses. Above-grade and subterranean parking, as well as above-grade connections for pedestrians and two new streets are also proposed. The Phase II Master Plan is proposed to be implemented gradually over 20 years.

Metro Comments

Bus Service Adjacency

Metro Local bus line 4 and Metro Rapid bus line 704 operate on Santa Monica Blvd., adjacent to the proposed Project. One Metro bus stop serving line 4 is located mid-block between 20th and 23rd St.

along Santa Monica Blvd. and sits directly adjacent to the proposed Project. The following comments relate to bus operations and the bus stop:

1. Although the Project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus facilities and services that are present. The existing Metro bus stop must be maintained as part of the final Project.
2. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus Operations. For construction activities that may impact Metro bus lines, please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 at least 30 days in advance of initiating construction activities. Other municipal buses may also be impacted and should be included in construction outreach efforts.
3. Metro encourages the installation of bus shelters with benches, way finding signage, enhanced crosswalks and ramps compliant with the Americans with Disabilities Act (ADA), as well as pedestrian lighting and shade trees in paths of travel to access transit stops and other amenities that improve safety and comfort for transit riders. The City should consider requesting the installation of such amenities as part of the development of the site.
4. Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.
5. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.

Active Transportation

Metro encourages the City to work with the applicant to promote bicycle use through adequate short-term bicycle parking, such as ground level bicycle racks, as well as secure and enclosed long-term bicycle parking for guests, employees, and residents. The applicant should help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and destinations such as 26th Street/Bergamot Metro Expo Line Station. Additionally, the Project is also encouraged to support these connections with wayfinding signage inclusive of all modes of transportation.

If you have any questions regarding this response, please contact Elizabeth Carvajal at 213-922-3084 or by email at DevReview@metro.net. Metro looks forward to reviewing the Draft EIR. Please send it to the following address:

**Metro Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952**

Sincerely,



Elizabeth Carvajal
Sr. Manager, Transportation Planning



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

April 28, 2017

rachel.kwok@smgov.net

Rachel Kwok, Environmental Planner
City of Santa Monica – Planning Division
1685 Main Street, Room 212
Santa Monica, CA 90407

Notice of Preparation of a Draft Environmental Impact Report for the Providence Saint John's Health Center Phase II Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR). Please send SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. Because the proposed construction would occur over a length of 20 years, it more closely resembles the characteristics of project operation. Therefore, the SCAQMD staff recommends that the Lead Agency quantify the proposed project's criteria pollutant emissions and compare the results to the SCAQMD's regional pollutant emissions thresholds to determine the air quality impacts. In addition to analyzing regional air

quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the proposed project and all air pollutant sources related to the proposed project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment (“*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*”) can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board’s *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB’s Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the proposed project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the proposed project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD’s CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- SCAQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD’s Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 AQMP available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf?sfvrsn=5>

- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here:
<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

In the event that the proposed project generates significant adverse air quality and health risks impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines §15126.6 (d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.

Permits

In the event that the proposed project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency for the proposed project. For more information on permits, please visit the SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to the SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at the SCAQMD's webpage (<http://www.aqmd.gov>).

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or call me at (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC170411-11

Control Number

Rachel Kwok

From: Priscilla Gilliam <priscillagilliam@fga-net.com>
Sent: Thursday, April 13, 2017 5:40 PM
To: Rachel Kwok
Cc: Betty Cashin; Eric Larson; Janice Mall; Jim Williams; Joe and Mary Woods; Joe Deering; Pat Armacost; Rob Lowe
Subject: St. John's Scoping Meeting Materials
Attachments: St Johns Expansion.pdf

Good afternoon, Ms Kwok,

Geneva Plaza, (1441 21st Street), an eight-story 100 unit affordable senior housing complex, is located within the boundaries of St. John's Phase II. Although it's shown in shadow on the drawings, it is not identified and labeled only as "residential." It was also omitted from the South Campus narrative on page 2.

The Board of Directors for Geneva Plaza believes that the future parking problems for Geneva Plaza should be dealt with in the EIR, and not ignored. Therefore, the Board would appreciate your assistance in causing the matter of Geneva Plaza to be included in the discussions and decisions.

Attached is the notice of the Scoping Meeting for the EIR for Phase II for your reference.

We are the property management company for Geneva Plaza. Please call me if you have questions.

Sincerely,

Priscilla Gilliam

Falkenberg/Gilliam & Associates, Inc.
PO Box 7070, Pasadena, CA 91109 • (323) 258-3512



CITY OF SANTA MONICA
CITY PLANNING DIVISION
1685 MAIN STREET, ROOM 212
SANTA MONICA, CA 90401

RECEIVED
APR 11 2017
Falkenberg/Gilliam

**NOTICE OF PREPARATION/NOTICE OF PUBLIC SCOPING MEETING
FOR A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
PROVIDENCE SAINT JOHN'S HEALTH CENTER PHASE II PROJECT**

DATE: April 10, 2017

TO: State Clearinghouse, Responsible Agencies, Trustee Agencies, Organizations and Interested Parties

LEAD AGENCY: City of Santa Monica
City Planning Division
1685 Main Street, Room 212
Santa Monica, California 90407
Contact: Rachel Kwok, Environmental Planner
Phone: (310) 458-8341

The City of Santa Monica (City) intends to prepare an Environmental Impact Report (EIR) for the proposed Providence Saint John's Health Center Phase II Project (the proposed project). In accordance with Section 15082 of the State CEQA Guidelines, the City has prepared this Notice of Preparation to provide the public, Responsible Agencies, and other interested parties with information describing the proposed project and its potential environmental effects. The EIR will address the proposed project's potentially significant effects in the following environmental issue areas:

- Aesthetics and Shade/Shadows
- Air Quality
- Construction Effects
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Population Housing
- Public Services
- Transportation/Circulation
- Utilities
- Mandatory Findings of Significance

PROJECT APPLICANT: Providence Saint John's Health Center

PROJECT LOCATION AND EXISTING ONSITE USES: The campus of Providence Saint John's Health Center is located in Santa Monica's Mid-City Neighborhood in an area bounded by Arizona Avenue to the north, Broadway to the south, 20th Street to the west and 23rd Street to the east as shown on Figure 1. The project sites are located both north and south of Santa Monica Boulevard as shown on Figure 2 and described as follows:

North Campus

- Site 2C, located along Santa Monica Boulevard to the west of the existing Entry Plaza. Site 2C is currently improved with a surface parking lot that is used for valet parking.
- Site 2D/2E, located on the northwest corner of Santa Monica Boulevard and 23rd Street (to the east of the existing Entry Plaza). Site 2D/E is currently improved with a surface parking lot and the former U.S. bank building/current Saint John's Health Center Foundation building at 2221 Santa Monica Boulevard.

- Site 2I, located along 20th Street midblock (1339 20th Street) between the existing medical office building located at 2001 Santa Monica Boulevard and the existing medical office building located at 1301 20th Street. Site 2I is currently improved with the Child and Family Development Center).

South Campus

- The South Campus project sites include a total land area of 225,550 SF (approximately 5.17 acres) located on both sides of 21st Street between Santa Monica Boulevard on the north and Broadway on the south as shown on Figure 2. The South Campus is currently improved with surface parking lots, the John Wayne Cancer Institute, a vacant 10-unit residential building located at 1417-1423 21st Street, and temporary buildings housing magnetic resonance imaging facilities.

PROJECT DESCRIPTION: The Phase II Master Plan will establish the basic parameters guiding Providence development of the Phase II Project, including, without limitation: (a) building placement, (b) heights for all buildings, (c) setbacks for all buildings, (d) stepbacks for all buildings, (e) parking (both subterranean and above-grade), (f) location of uses, (g) vehicular and pedestrian circulation, (h) open space and (i) a Phase II Project phasing plan.

The existing buildings/improvements proposed to be demolished/removed as part of the Phase II Master Plan are identified on Figure 2. These consist of (i) the existing Child and Family Development Center ("CFDC"), (ii) the existing MRI Facility ("MRI"), (iii) the existing Saint John's Health Center Foundation building ("SJF"), (iv) the existing John Wayne Cancer Institute ("JWCI"), and (v) the vacant 10-unit residential building ("RB").

As illustrated in Figure 3, the Phase II Master Plan includes the following uses to be located in ten new buildings: Hospital/Health Care, Medical Research Facilities (including a new facility for the John Wayne Cancer Institute), new Child & Family Development Center, Day Care, Health & Wellness Center, Education & Conference Center, Visitor Housing, 10 replacement residential apartment units, as well as opportunities for Health-Related Services, Neighborhood Commercial Uses and Restaurants/Cafés. Figure 3 also shows the proposed building heights for the ten new buildings proposed as part of Phase II, and also depicts the proposed building footprints (including above-grade pedestrian connections between buildings), and proposed open space locations.

Additionally, the Phase II Master Plan proposes to build two new north-south streets (20th Place and 22nd Street) on the South Campus connecting Santa Monica Boulevard with Broadway, a new east-west street on the South Campus connecting 21st Street and the new 20th Place, and to vacate the northern portion of 21st Street between Santa Monica Boulevard and Broadway. Figure 4 depicts the proposed streets, traffic signals, and driveways.

Subterranean parking is proposed beneath each of the Phase II development sites. In addition, on North Campus Site 2I, an above and below-grade parking structure is proposed. Figure 4 also shows the locations of proposed above-grade and subterranean parking. In addition to the above-grade connections for pedestrians shown in Figure 3 (including an enclosed pedestrian walkway above Santa Monica Boulevard for use by patients and caregivers), below-grade connections are proposed for vehicle circulation between various subterranean garages (including under Santa Monica Boulevard) and the transfer of materials/supplies between buildings as shown on Figure 4.

The Phase II Master Plan is proposed to be implemented gradually over 20 years. The applicant contemplates that the applications for these 10 new buildings and related improvements will be submitted in sequence (i.e., in Stages A through E) after approval of the Phase II Master Plan as detailed in Figure 5. The applicant may, as an alternative, elect to pursue Stage C as the first stage of Phase II. In such event, the time limits to have applications deemed complete for other Stages, as provided in Figure 5, may be adjusted accordingly. The total development contemplated under the Phase II Project is summarized in Figure 6. It is

also anticipated that the Phase II Project Master Plan will require an amendment to the Hospital Area Specific Plan.

REVIEW PERIOD: As specified by the State CEQA Guidelines, this Notice of Preparation will be circulated for a minimum 30-day review period. Please go to the City's webpage <https://www.smgov.net/Departments/PCD/Environmental-Reports/St-Johns-Health-Center-EIR/> for the NOP and associated project info. The City welcomes agency and public input during this period regarding the scope and content of environmental information related to your agency's responsibility that must be included in the Draft EIR. **Comments may be submitted, in writing, by 5:30 p.m. on May 11, 2017** and addressed to:

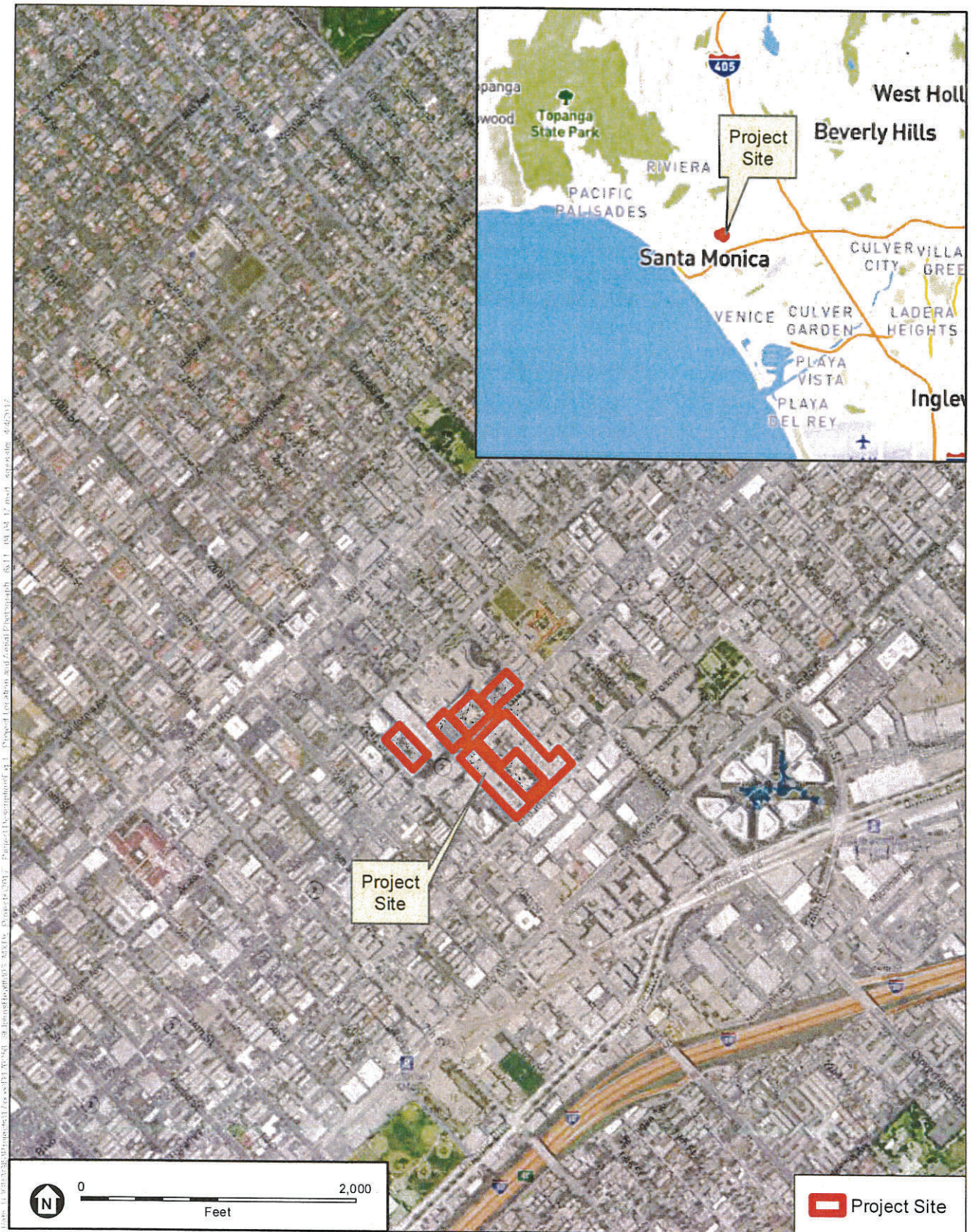
Rachel Kwok, Environmental Planner
City Planning Division
1685 Main Street, Room 212
Santa Monica, California 90407
Telephone: (310) 458-8341
E-mail: rachel.kwok@smgov.net

PUBLIC SCOPING MEETING: A public scoping meeting in an open house format will be held to describe the proposed project, the environmental review process, and to receive public comments on the scope of the EIR. The meeting will be held at the following date and location:

**6:00 pm - 7:30 pm
Monday, April 24, 2017
McKinley Elementary School (Auditorium)
2401 Santa Monica Boulevard
Santa Monica, CA 90404**

The City will consider all comments, written and oral, in determining the final scope of the evaluation to be included in the EIR.

ESPAÑOL: Esto es noticia para la preparación de un informe que describa los posibles efectos ambientales en referencia a la construcción propuesta de un plan maestro de hospital, que puede ser de su interés. Para más información, llame a Carmen Gutierrez al (310) 458-8341



SOURCE: NAIP, 2014 (Aerial).

Providence Saint John's Health Center Phase II Project

Figure 1
Project Location and Aerial Photograph

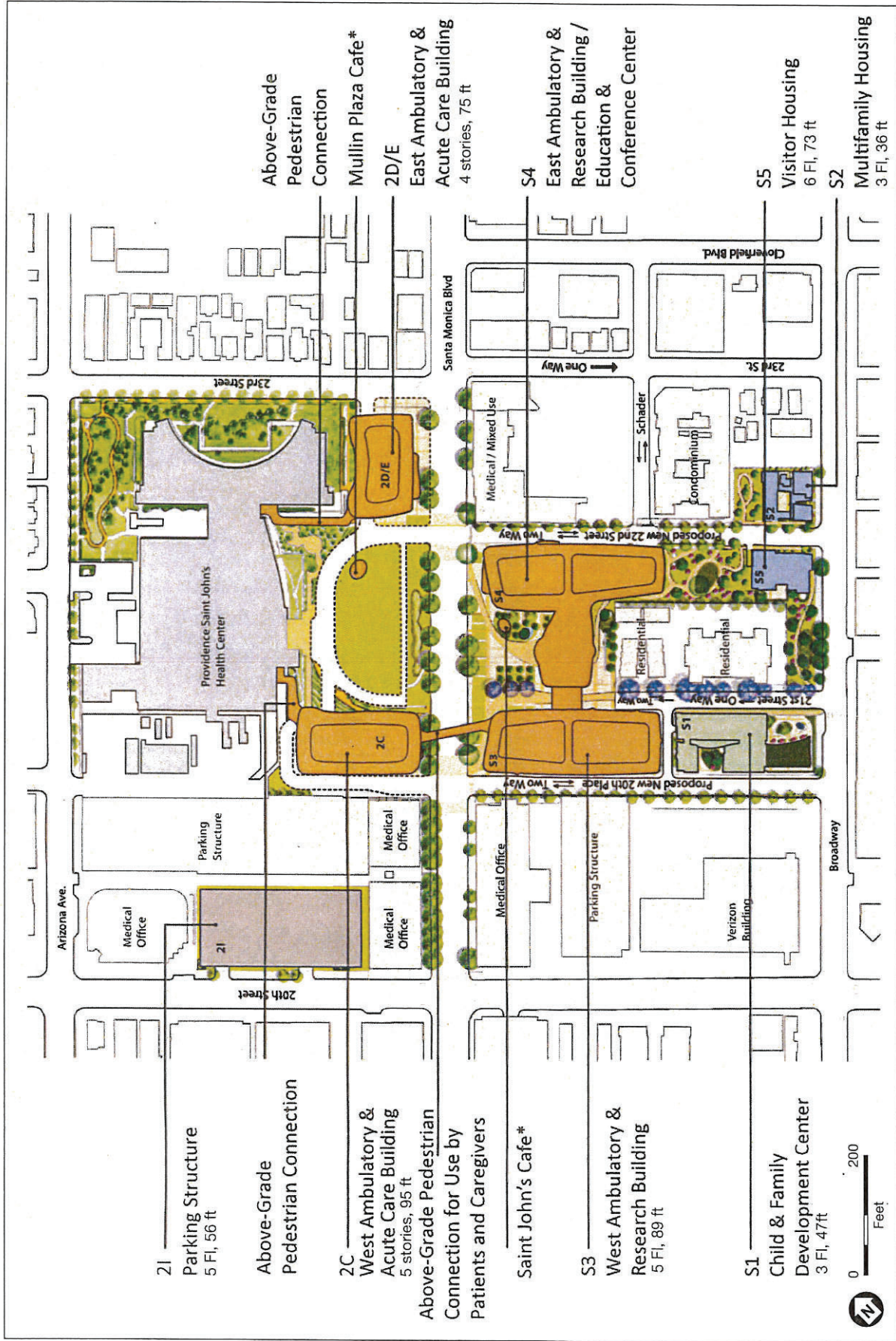


SOURCE: Perkins Eastman, 2017

Providence Saint John's Health Center Phase II Project

Figure 2
Phase II Project Area



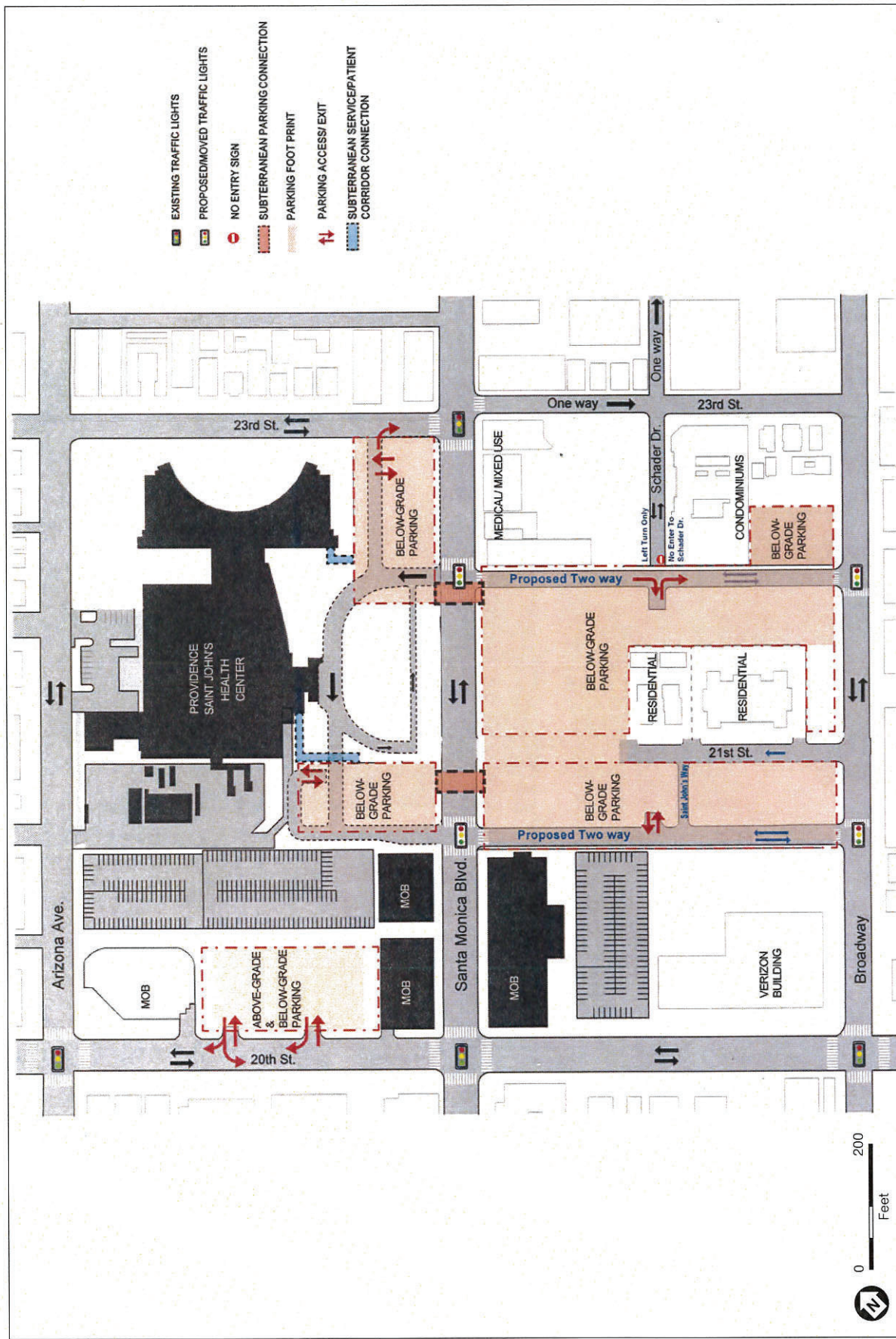


Providence Saint John's Health Center Phase II Project

Figure 3
Phase II Site Plan

SOURCE: Perkins Eastman, 2017





Providence Saint John's Health Center Phase II Project

Figure 4
Phase II Circulation and Parking

SOURCE: Perkins Eastman, 2017





SOURCE: Perkins Eastman, 2017

Providence Saint John's Health Center Phase II Project

Figure 5
Phase II Implementation

PHASE TWO BUILDINGS					
Building Name		Types of DA Vested Uses in Building	Floor Area/ Units per Use*	Max. Building Floor Area	Max. Height**
S1	Child & Family Development Center	Child & Family Development Center	25,500 sf	34,500 sf	47 feet (3 floors)
		Day Care	15,000 sf		
S2	Multifamily Housing	Multifamily Housing	10 units	10 units plus 800 sf commercial	36 feet (3 floors)
		Neighborhood Commercial Uses	800 sf		
S3	West Ambulatory Care & Research Building - South Campus	Hospital/Health Care	65,000 sf	123,000 sf	89 feet (5 floors)
		Medical Research Facilities (JWCI)	115,000 sf		
		Restaurant or Neighborhood Commercial Uses or Health Related Services	5,000 sf		
S4	Education & Conference Center and East Ambulatory Care & Research Building - South Campus	Education & Conference Center	60,000 sf	199,300 sf	105 feet (6 floors)
		Hospital/Health Care	120,000 sf		
		Health & Wellness Center	35,000 sf		
		Medical Research Facilities	50,000 sf		
		Health-Related Services Restaurant or Neighborhood Commercial Uses	10,000 sf		
S5	Visitor Housing	Visitor Housing	30-34 units	38,000 sf	73 feet (6 floors)
	Saint John's Café	Restaurant or Neighborhood Commercial Uses	900 sf	900 sf	17 feet (1 floor)
2C	West Ambulatory & Acute Care Building - North Campus	Hospital/Health Care	115,000 sf***	112,000 sf above-grade 6,000 sf below-grade***	95 feet (5 floors)
		Health-Related Services Restaurant or Neighborhood Commercial Uses	5,000 sf		
2D/E	East Ambulatory & Acute Care Building - North Campus	Hospital/Health Care	90,000 sf****	70,000 sf above-grade 20,000 sf below-grade****	75 feet (4 floors)
2I	Parking Structure	Parking	157,000 sf	160,000 sf	56 feet (5 floors)
		Health-Related Services	3,000 sf		
	Mullin Plaza Café	Restaurant or Neighborhood Commercial Uses	1,500 sf	1,500 sf	17 feet (1 floor)

*For some buildings, the sum of the maximum floor areas for the Vested Uses within the building exceed the overall building floor area in order to allow flexibility with respect to the location and amount of certain Vested Uses.

**Heights do not include projections for roof elements, including mechanical equipment, exhaust pipes, elevator overrides, HVAC and other equipment.

***Includes 2,200 sf pedestrian walkway across SM Boulevard connecting 2C to S3, 2,000 sf pedestrian walkway connecting 2C to the existing Howard Keck Diagnostic & Treatment Center, and 3,000 sf subterranean connection between 2C and the existing Howard Keck Diagnostic & Treatment Center.

****Includes 3,000 sf pedestrian walkway connecting 2D/E to the existing Chan Soon-Shiong Center for Life Sciences and 650 sf subterranean connection between 2D/E and the existing Chan Soon-Shiong Center.

SOURCE: Perkins Eastman, 2017

Providence Saint John's Health Center Phase II Project

Figure 6
Phase II Development Summary

MICHELE F. PRINCE, LCSW, MAJCS

2502-5 Arizona Avenue, Santa Monica, California 90404

michelefprince@gmail.com • (310) 770-8657

May 11, 2017

Rachel Kwok
Roxanne Tanemori
City of Santa Monica – City Planning Division
1685 Main Street, Room 212
Santa Monica, CA 90401

Dear Rachel, Roxanne and Others to Whom it May Concern,

This letter is a response to the April 24 Public Scoping Meeting on the Saint John's Health Center Phase II Project EIR. The following are concerns and considerations that impact my family and neighbors, and me as a Santa Monica resident and neighbor of the project. Thank you for the opportunity to provide these comments regarding the scope and content of the project EIR. We appreciate the chance to add to an overall list of items to study for when the project goes to the Planning Committee.

CONSTRUCTION NOISE AND EFFECTS

I have great concern for the level of noise throughout weekdays and weekend days during construction. The news that the Phase II of this project will be implemented over twenty years is horrifying. While I recognize there will not be steady work over every day of those years, the impact of this construction on our daily lives will reduce our quality of life and the value of our homes. I want to be sure that your team takes into serious consideration ways to minimize and mitigate the level of **noise and vibration** during construction. Having lived through Phase I of this project, these are not empty concerns. My husband's work office is in our home and will be impacted by sound distraction.

We are, even now, continually impacted by the **sirens from ambulances** arriving at Saint John's Health Center, even though we neighbors were promised that ambulances would turn off their sirens when in our residential neighborhood, so our distrust and fear of the process is real.

CONSTRUCTION DEBRIS AND AIR QUALITY

During the previous phase of the construction project, we experienced extra dust and debris in and around our home. This **fugitive dust** is unsafe and unpleasant. We want to be sure that your team mitigates this air quality impact. Air quality overall is another issue, during all times, not only active construction. We current smell unpleasant and unfortunate **odors**, particularly on 23rd Street, but as far as our home on Arizona Ave. and 26th Street. Increased patient activity will increase medical waste, and we want to be sure your plan includes plans to eliminate these odors, now and for the future.

TRAFFIC FLOW, TRANSPORTATION, CIRCULATION

The project is likely to increase **traffic** in our neighborhood. What will your team do to mitigate this? There are two proposed traffic lights on Santa Monica Blvd. Using these to increase pedestrian safety is important but may also slow down traffic flow in an already overburdened area with high traffic. Please include recommendations in your final plans that ensure both **safety and traffic improvements**.

PARKING

Current staff of the health center use our **residential parking**. Those staff members use metered parking, some park with disability placards, others park on our zoned streets. When I am out walking in the mornings near 7:00am to 7:30am, I see staff who may be leaving shift changes enter their vehicles. This Phase II project, with its increased patient volumes and staff, will impact street parking for patients and staff. Please include recommendations to mitigate this problem. The meeting on April 10 and corresponding paperwork also described subterranean parking. Please include descriptions in your next plans for land implications, including **soil stability** and **seismic impact** for all this underground activity.

AESTHETICS

I am saddened for the changes that will occur to our neighborhood's **visual character** and **residential flavor**. If we had wanted to live an urban experience, we would have bought a home in a more urban area. The renderings we saw at the Scoping Meeting indicate that designs, such as for the planned parking structure, do not retain the feel of a residential neighborhood, much less a smaller town feel. We call for study on the aesthetics of the project, with an eye to limit the aesthetic change to the visual character of our neighborhood.

Overall, my family and I are appreciative for the efforts of Saint John's Medical Center to add greenery to the surrounding streets, and of course, also to provide necessary health care to our Santa Monica community. We want, however, our needs as neighbors to be addressed, and the City's and Health Center's promises to be kept. Thank you for the opportunity to provide these comments regarding the scope and content of the project EIR.

Sincerely,



Michele F. Prince, LCSW, MAJCS
Resident: 2502-5 Arizona Ave., Santa Monica, CA 90404

May 11, 2017

Rachel Kwok, Environmental Planner
City Planning Division
City of Santa Monica
1685 Main Street, Room 212
Santa Monica, CA 90407

RE: COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Ms. Kwok:

This letter may be a bit premature in that it does not specifically address the Draft Environmental Impact Report currently being generated for the Saint John's Health Center Phase II Project. However, it is the intention of the letter to apprise the City Planning Division of our concerns at an early stage of project planning.

I represent the ownership of a retail/office development located on the south side of Broadway east of 20th Street and immediately east of the VCA Veterinary Clinic which is located on the southeast corner of Broadway and 20th Street. This development includes an office building and restaurant and has existed at this location since the late 1980's.

Although the project includes on-site parking it also relies on street parking for patrons, particularly of the restaurant. In recent years employees, visitors and patients at Saint John's have usurped virtually all of the street parking, leaving very little to none for patrons of the restaurant which is open for breakfast and lunch only and for the office building which has as its main tenant a chiropractor.

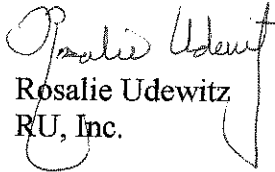
Starting early on weekday mornings, vehicles arrive and park on both the north and south sides of Broadway between 20th Street and Cloverfield Avenue. A large proportion of these vehicles have handicap placards (we have conducted several surveys to determine the percentage of vehicles with handicap placards which park on Broadway and it has been as high as 60 percent). A number of these vehicles park for the entire business day in that there is no requirement to feed meters for vehicles with handicap placards. Others park for a number of hours. In addition to these vehicles, there are other vehicles which park and simply feed the meters. Although we do not have an absolute track, it is our opinion that most of the vehicles which park on this section of Broadway are in one way or another associated with the hospital. We are aware that Saint John's maintains several parking lots in this immediate area for employees. Nonetheless parking has been an increasingly problematic situation.

Rachel Kwok
May 11, 2017
Page Two

We are writing this letter in the hope that even at this very early stage the environmental planning for the Phase II Project will give strong consideration to the fact that there currently either is insufficient on-site parking for employees, visitors and patients of the hospital or that hospital associated parking is too costly and is thus forcing people to find alternative means of parking which in turn is seriously impacting the businesses located on Broadway.

Thank you for your consideration of this situation.

Sincerely,


Rosalie Udewitz
RU, Inc.

I would like to call your attention to Priscilla Gillian's letter to Rachel Kwok.

Geneva Plaza is a 100 unit senior residence located at 1441 21st street between Broadway and Santa Monica Blvd. and surrounded by Providence Saint John's.

Geneva Plaza provides affordable housing for seniors.

Geneva Plaza's seniors need affordable parking.

There is a need for a passenger loading and unloading zone and emergency parking for paramedics, ambulance and fire in front of Geneva Plaza.

I ask that the EIR will address the affordable parking and emergency vehicle issue.

Joe Woods

President Westminster Towers Corp.

Providence Saint John's Scoping Meeting Comments

Monday April 24, 2017

- City manager mentioned free shuttle from Saint John's to 17th Street Expo Station. What will be its effects on traffic and TDM?
- There is currently misuse of handicapped placards. Should look into fees and charges for misuse and how it will affect parking.
- Parking should be designed in a manner that could be converted to workplace housing.
- Affordable parking needs to be considered.
- Where will people park when Stage A is constructed?
- What is the timing of construction?